

Safeguarding lead: Emma Cross, Chief Executive Officer

Deputy safeguarding lead: Laura Jenkins, Client Services Manger

Citizens Advice in West Sussex (North, South, East) has a safeguarding lead who is the person responsible for reporting concerns of abuse and neglect to the relevant authority. In their absence the deputy safeguarding lead will take this action.

Who is this policy for?

This policy applies to all paid staff and volunteers at **Citizens Advice in West Sussex (North, South, East) (CAWS)** including senior managers and trustees. It also applies to anyone working on behalf of **CAWS**.

Why do we have a policy?

We have a policy to:

- protect children and young people who receive **CAWS services**. This includes the children of adults who use our services
- detail what **CAWS** will do to keep children safe and how we will deal with any concerns we have regarding a child's safety
- provide staff and volunteers with the overarching principles that guide our approach to children's safeguarding and child protection

It's important we have a policy because in the course of their day-to-day work within **CAWS** it's likely that staff and volunteers will come into contact with children. In some instances this will be incidental contact, for example when an adult client brings their children along to an advice appointment.

There may also be situations when staff and volunteers at **CAWS** provides advice or services to clients who are children. Targeted work with children is not currently being carried out (as of October 2018)

CAWS aims to keep children safe and prevent them from harm. We are committed to:

- having sound recruitment practices
- ensuring all staff and volunteers have an understanding and awareness of children's safeguarding
- ensuring all staff and volunteers know how to raise safeguarding concerns and feel confident doing

so

Our legal and membership duties

It is a requirement of Citizens Advice membership that **CAWS** acts within the relevant laws and regulations to safeguard clients from harm and abuse.

Although there are no specific mandatory regulations in the UK requiring staff and volunteers at **CAWS** to report suspicions of child abuse to the authorities, there are some expectations that are set out in legislation and guidance.

Sections 11 and 12 of the Children Act 2004 places a statutory duty on agencies to co-operate to safeguard and promote the welfare of children.

Paragraphs 15 and 16 of the introduction to the government guidance 'Working together to safeguard children' state that "Everyone who works with children - including teachers, GPs, nurses, midwives, health visitors, early years professionals, youth workers, police, Accident and Emergency staff, paediatricians, voluntary and community workers and social workers - has a responsibility for keeping them safe".

Other relevant legislation in relation to children's safeguarding includes:

- The Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Group Act 2006
- Protection of Freedoms act 2012
- Children and Families Act 2014
- Special Educational Needs and Disability (SEND) code of practice 0-25 years. This is statutory guidance for organisations that work with and support children and young people who have special educational needs or disabilities (HM Government 2014)

Who is protected by this policy?

Safeguarding and child protection applies to all children and young people under the age of 18. This includes our clients and the children of our clients.

CAWS recognises that:

- The welfare of the child is paramount as enshrined in the Children Act 1989
- All children regardless of age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy or maternity, racial heritage, religious belief, sexual orientation or identity have a right to equal protection from all types of harm and abuse
 - Some children are especially vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues

What do we mean by safeguarding?

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm.

Safeguarding means:

- protecting children from abuse and maltreatment
- preventing harm to children's health or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant hardship. This includes child protection procedures which detail how to respond to concerns about a child.

What is child abuse?

CAWS follows guidance on child safeguarding and child protection set out by the NSPCC, who are a leading child safety charity.

The NSPCC have extensive information on [child abuse, the different types of abuse and signs and symptoms of child abuse.](#)

Below is a summary of the main types of child abuse. Further information on signs and symptoms of abuse can be found on the NSPCC website.

Office Manual
Safeguarding Children

Author: BMIS / EM

Date updated: Emma Morris 22/04/2020

Page 3 of 6

Type of Abuse	Detail of abuse
Domestic abuse	<ul style="list-style-type: none"> • Can apply to different types of abuse that occur either in a relationship or between family members. • Can also occur in teenage relationships • If children witness domestic abuse this is considered child abuse
Sexual abuse	<ul style="list-style-type: none"> • Can be physical but can also occur online • Involves a child being forced, persuaded or coerced into taking part in sexual activities • Can include being made to watch sexual acts or material
Neglect	<ul style="list-style-type: none"> • Where a child's needs are not met on an ongoing basis
Online abuse	<ul style="list-style-type: none"> • Abuse that occurs online and through social media
Physical abuse	<ul style="list-style-type: none"> • Where a child is hurt or injured deliberately
Emotional abuse	<ul style="list-style-type: none"> • This can sometimes come under the heading psychological abuse • It involves neglecting a child's emotional needs or mistreating a child emotionally • Can include verbal abuse, ignoring or belittling a child or frightening them
Child sexual exploitation	<ul style="list-style-type: none"> • When a child is exploited sexually for gain. The gain could be financial, but it can also be for power or status
Female genital mutilation (FGM)	<ul style="list-style-type: none"> • The ritual removal of some or all of the female genitalia for non-medical reasons
Bullying and cyberbullying	<ul style="list-style-type: none"> • Can occur in a number of locations as well as online • Is normally ongoing for a long period of time
Child trafficking	<ul style="list-style-type: none"> • Children are trafficked by being recruited, moved or transported and then exploited, mistreated or sold
Organisational abuse	<ul style="list-style-type: none"> • Can occur in various settings such as a hospital or care home • This type of abuse can be one-off incidents as well as ongoing patterns of abuse
Grooming	<ul style="list-style-type: none"> • Can occur online and through social media as well as in real life • Abusers can be strangers or someone known to the child • The abuser works to gain the child's trust so that they can abuse or exploit them sexually

Office Manual
Safeguarding Children

Author: BMIS / EM

Date updated: Emma Morris 22/04/2020

Page 4 of 6

Harmful sexual behaviour	<ul style="list-style-type: none"> This includes when a child displays a range of sexual behaviour including inappropriate touching, the use of sexually explicit words or phrases, using sexual violence or threats, and sex with other children or adults
--------------------------	--

The NSPCC identifies several situations of increased risk of harm:

- deaf or disabled children
- children affected by previous experiences, level of dependency, communication needs or other issues

Radicalisation and safeguarding

If you are concerned about a child becoming radicalised, follow the stages in our safeguarding procedure. CAWS does not have a statutory duty in this area but it's important to keep people safe.

The government has a counter-terrorism strategy that includes supporting vulnerable people to prevent them being drawn into terrorism. You can read [more detail on this strategy](#).

All staff and volunteers at CAWS will be mindful of radicalisation and report any concerns using our safeguarding adult and children policies.

Confidentiality and safeguarding

Confidentiality is one of the founding principles of Citizens Advice. It is important that our clients can trust us and know that the information they disclose to us is treated in confidence.

If a person aged under 18 is the client of CAWS then the details of the advice given to them should remain confidential, even if their parent asks.

However, if an adviser has suspicions or has information disclosed to them about a child being abused, they have a responsibility to take action. The welfare of the child is paramount in these situations.

Where a member of staff or a volunteer has a suspicion that a child is being abused or has information disclosed to them alleging abuse, they should follow the steps in the safeguarding procedure.

CAWS are legally required to report any incidents where a member of staff or a volunteer is disciplined or dismissed for inappropriate behaviour with or against a child.

Screening of staff and volunteers

Advisers whose work is specifically targeted at children or working in premises such as schools, Sure Start and youth projects must obtain an enhanced DBS (Disclosure and Barring Service) check and it is unlikely that any head teacher or centre manager will allow anyone from the local Citizens Advice onsite without prior screening.

The DBS has advised that it is extremely unlikely that any Citizens Advice role would be entitled to a 'Barred List check'.

For more information on screening and DBS checks speak to your manager or see the BMIS items: [Disclosure and barring: Citizens Advice service policy](#) and [Getting a DBS check - the process](#).

It is not legally permissible to have enhanced checks on other staff in the local Citizens Advice. However, chief officers may choose to ask some staff to undergo a [basic check](#).

Anyone with a conviction for a sexual offence against a child or vulnerable adult, whenever it was committed, is not considered suitable to work or volunteer within the service and must not be taken on by a local Citizens Advice. Any other convictions must be considered on an individual basis. See the separate [BMIS item on ex-offenders](#).

Training staff and volunteers

Thorough induction training will be provided to ensure that staff and volunteers are aware of good safeguarding practice alongside the service's core values and confidentiality.

Staff and volunteers will be given regular supervision and have their training needs assessed.

Appropriate safeguarding training is available to all staff and volunteers. This may be in the form of:

- policy awareness sessions delivered internally
- briefing sessions by local authority or other relevant authority
- attendance at training arranged through partner agencies

If a staff member or volunteer is removed from their role

If a staff member or volunteer is moved or dismissed from their role because of safeguarding concerns arising from their actions or inactions, **CAWS** has responsibilities as a regulated activity provider to inform the Disclosure and Barring Service. **CAWS** will follow the guidance set out by the Disclosure and Barring Service in these situations.

Developing new services

Any new services in development will take account of the need to safeguard children. This may be achieved by:

- risk assessment of proposed activities
- agreeing safeguarding measures with partner organisations including information sharing protocols
- seeking specialist advice, for example from the local safeguarding children board

Appendix 1: Safeguarding behaviours for working with children

This awareness of safeguarding and child protection will be demonstrated through the following behaviour and actions:

- Staff will not look after children out of the sight of a parent or carer who is seeking advice.
- Staff will be aware that a person under the age of 18 is legally a child, even if they look and express themselves like an adult.
 - Where possible, activities that involving a child working with an adult will take place in a room which can be easily observed by others. This needs to be balanced with client confidentiality.
- An adviser will always make their Advice Session Supervisor aware when a child is being interviewed alone.
- An adviser will never visit a child in their home unaccompanied. The adviser will ensure that a parent or guardian is present.
- Staff and volunteers will never transport a child in their car unless prior arrangements have been made or in exceptional circumstances such as a medical emergency, where this is appropriate.
 - **CAWS** will employ sound recruitment practices which aim to prevent anyone considered to be a risk to children from working within the service.
 - Staff and volunteers will comply with the requirements of Citizens Advice DBS policy, and the appropriate level of DBS check will be completed for staff and volunteers where it is required.
 - Staff and volunteers will take care not to make any comments which may be interpreted as sexual in nature, to a child.
 - A child will never be allowed into a staff member's home.
- Staff and volunteers will not engage in any physical games with a child – apart from structured sports activities which may be part of a community event etc.
 - Staff and volunteers will not engage in sexually provocative games.
 - Staff and volunteers will not allow children to use inappropriate language unchallenged.
 - If a child is distressed, comfort will be offered with words rather than by touching them.
 - The content of conversations will be professional and pertinent to the advice giving process.
 - Staff and volunteers will not let allegations that a child makes go unchallenged or unrecorded.



Office Manual
Safeguarding Children

Author: BMIS / EM

Date updated: Emma Morris 22/04/2020

Page 6 of 6

- Staff and volunteers will not do things of a personal nature for children that they can do themselves.
- Staff and volunteers will not take photographs of children.

Safeguarding lead: Emma Cross, Chief Executive Officer

Deputy safeguarding lead: Laura Jenkins, Client Services Manger

Citizens Advice in West Sussex (North, South, East) has a safeguarding lead who is the person responsible for reporting concerns of abuse and neglect to the relevant authority. In their absence the deputy safeguarding lead will take this action.

Who is this policy for?

This policy applies to all paid staff and volunteers at **Citizens Advice in West Sussex (North, South, East) (CAWS)**, including senior managers and trustees. It also applies to anyone working on behalf of **CAWS**.

No one should ignore allegations or suspicions of abuse or neglect.

Why do we have a policy?

We have a policy to:

- stop abuse and neglect where possible
- prevent harm and reduce the risk of abuse and neglect
- provide staff and volunteers with overarching principles that guide our approach to safeguarding

It's important we have a policy because we provide services to a range of adults and we may suspect or be told about current or historic abuse or neglect. Our safeguarding guidelines and procedures will ensure that staff and volunteers are able to deal appropriately with these situations. This will include:

- having sound recruitment practices
- ensuring all staff and volunteers have an understanding and awareness of adult safeguarding
- ensuring all staff and volunteers know how to raise safeguarding concerns and feel confident doing so

Our legal and membership duties

It is a requirement of Citizens Advice membership that **CAWS** acts within the relevant laws and regulations to safeguard clients from harm and abuse.

Legislation does not place a statutory duty on us to report safeguarding concerns about an adult, except in specific circumstances relating to contracts or agreements (this is explored in more detail in the section 'Working with local authority commissioners'). But this does not mean we do not have a responsibility and duty to safeguard the wellbeing of adults using our service. Safeguarding is the responsibility of everyone at **CAWS**.

The legislation covering safeguarding is the Care Act 2014 (England) and the Social Services and Wellbeing (Wales) Act 2014. These acts put duties on local authorities in relation to adult safeguarding. We will take these duties into account in our work with clients and support the local authorities to fulfil their statutory duties where possible. They include:

- stopping abuse or neglect wherever possible
- preventing harm and reducing the risk of abuse or neglect to adults with care and support needs
- safeguarding adults in a way that supports them in making choices and having control about how they want to live
- promoting an approach that concentrates on improving life for the adults concerned
- raising public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect

**Office Manual
Safeguarding Adults**

Author: BMIS / EM

Date updated: 22 04 2020

Page 2 of 8

- providing information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or wellbeing of an adult
- addressing what has caused the abuse or neglect

Who is protected by this policy?

We recognise that many policies and organisations refer to ‘adults at risk’ or ‘vulnerable adults’. This policy adopts the broader definitions introduced in recent legislation such as the Care Act 2014 and the Social Services and Wellbeing (Wales) Act 2014. Their definitions are broader and far-reaching and could potentially cover many of our service users.

Under the Care Act 2014 and the Social Services and Wellbeing (Wales) Act 2014 safeguarding duties apply to an adult who:

- has care and support needs, and
- is experiencing, or is at risk of, abuse or neglect, and
- is unable to protect themselves because of their care and support needs

An adult with care and support needs may be:

- an older person
- a person with a physical disability, a learning difficulty or a sensory impairment
- someone with mental health needs, including dementia or a personality disorder
- a person with a long-term health condition
- someone who misuses substances or alcohol to the extent that it affects their ability to manage day-to-day living

We will apply this policy equally to all adults who use **CAWS** services regardless of age, race, disability, gender reassignment, marriage and civil partnership status, pregnancy and maternity, religion and belief, sex and sexual orientation.

What do we mean by safeguarding?

Safeguarding is defined as “Protecting an adult's right to live in safety, free from abuse and neglect” (Care and support statutory guidance, chapter 14 Safeguarding). Adult safeguarding is about preventing and responding to concerns of abuse, harm or neglect of adults at risk.

Principles for guiding our safeguarding activities

CAWS will use these principles to guide our safeguarding activities. They are also used by local authorities and other statutory bodies to direct their adult safeguarding activities:

- **empowerment** - actions or decisions must be based on the presumption of person-led decisions and informed consent
- **prevention** - it is better to take action before harm occurs
- **proportionality** - the least intrusive response appropriate to the risk presented
- **protection** - support and representation for those in greatest need
- **partnerships** - local solutions through services working with their communities
- **accountability** - accountability and transparency in delivering safeguarding

Fundamental to this policy is our aim to involve the client in decisions about what should happen wherever possible.

Recognising the different types of abuse and risk

The indicators provided below are not an exhaustive list of signs and symptoms of someone suffering abuse and neglect. Further information about possible signs and symptoms can be found online by visiting the NHS webpage on safeguarding or the Social Care Institute of Excellence webpages on safeguarding.

**Office Manual
Safeguarding Adults**

Author: BMIS / EM

Date updated: 22 04 2020

Page 3 of 8

Type of abuse	Indicators of abuse
<p>Physical abuse: This type of abuse involves hitting, kicking, spitting and biting. It can also involve restraining someone, making someone intentionally uncomfortable or withholding food, water or medication</p>	<p>These could include if someone has physical injuries such as bruising, cuts or burns and is unable to provide a consistent explanation of the injuries they have.</p>
<p>Domestic violence or abuse: This type of abuse not only applies to physical abuse but also includes the following:</p> <ul style="list-style-type: none"> ● psychological ● sexual ● financial ● emotional <p>It includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so-called 'honour'-based violence, female genital mutilation and forced marriage</p>	<p>These could include the following:</p> <ul style="list-style-type: none"> ● low self esteem ● feeling that the abuse is their fault when it is not ● physical evidence of violence such as bruising, cuts, broken bones ● verbal abuse and humiliation in front of others ● fear of outside intervention ● damage to home or property ● isolation – not seeing friends and family ● limited access to money
<p>Sexual abuse: This type of abuse includes rape, any inappropriate touching, indecent exposure, sexual acts to which the adult has not consented or lacks the capacity to consent, sexual photography or forced use of pornography or the witnessing of sexual acts</p>	<p>It may be more difficult to pick up on indicators for this type of abuse as they can include physical symptoms such as bruising or bleeding in places covered by clothing. However the following may be noticeable:</p> <ul style="list-style-type: none"> ● bruising to the upper arms and marks on the neck ● unusual difficulty in walking or sitting ● self harming
<p>Psychological and emotional abuse: This type of abuse includes including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks</p>	<p>The indicators of this type of abuse can include the following:</p> <ul style="list-style-type: none"> ● an air of silence when a particular person is present ● withdrawal or change in the psychological state of the person ● insomnia ● low self-esteem ● uncooperative and aggressive behaviour ● a change of appetite, weight loss/gain ● signs of distress: tearfulness, anger

**Office Manual
Safeguarding Adults**

Author: BMIS / EM

Date updated: 22 04 2020

Page 4 of 8

	<ul style="list-style-type: none"> ● apparent false claims, by someone involved with the person, to attract unnecessary treatment
<p>Financial or material abuse: This type of abuse can involve theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits</p>	<p>These could include the following:</p> <ul style="list-style-type: none"> ● unexplained lack of money or inability to maintain lifestyle ● unexplained withdrawal of funds from accounts ● power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity ● the person allocated to manage financial affairs is evasive or uncooperative ● the family or others show unusual interest in the assets of the person ● signs of financial hardship in cases where the person's financial affairs are being managed by a court-appointed deputy, attorney or LPA ● recent changes in deeds or title to property ● rent arrears and eviction notices ● disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house ● unnecessary property repairs
<p>Modern slavery: This type of abuse encompasses slavery, human trafficking, forced labour and domestic servitude</p>	<p>These could include the following:</p> <ul style="list-style-type: none"> ● signs of physical or emotional abuse ● appearing to be malnourished, unkempt or withdrawn ● isolation from the community, seeming under the control or influence of others ● living in dirty, cramped or overcrowded accommodation and/or living and working at the same address ● lack of personal effects or identification documents ● always wearing the same clothes ● avoidance of eye contact, appearing frightened or hesitant to talk to strangers
<p>Discriminatory abuse: Including forms of harassment, slurs or similar treatment because of age, race, religion or belief, sex, sexual orientation, gender reassignment, disability, marriage and civil partnership, pregnancy and maternity</p>	<ul style="list-style-type: none"> ● the person appears withdrawn and isolated ● expressions of anger, frustration, fear or anxiety ● the support on offer does not take account of the person's individual needs in terms of a protected characteristic
<p>Organisational or institutional abuse:</p>	<p>These could include the following:</p>

<p>Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one-off incidents to ongoing ill-treatment</p>	<ul style="list-style-type: none"> ● inadequate staffing levels ● people being hungry or dehydrated ● poor standards of care ● lack of personal clothing and possessions and communal use of personal items ● lack of adequate procedures ● poor record-keeping and missing documents ● absence of individual care plans ● lack of management overview and support
<p>Neglect and acts of omission: Including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating</p>	<p>These could include the following:</p> <ul style="list-style-type: none"> ● failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care ● providing care in a way that the person dislikes ● failure to administer medication as prescribed ● refusal of access to visitors ● not taking account of the person's cultural, religious or ethnic needs
<p>Self neglect: This covers a wide range of behaviour that is neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding</p>	<p>These could include the following:</p> <ul style="list-style-type: none"> ● very poor personal hygiene ● unkempt appearance ● lack of essential food, clothing or shelter ● malnutrition and/or dehydration ● living in squalid or unsanitary conditions ● neglecting household maintenance

ASK routine enquiry programme - Gender Violence (domestic abuse)

The ASK routine enquiry programme is being rolled out across all local Citizens Advice. This section can be used to provide brief information on the programme and where to find more information, **ASK RE will be rolled out in key CAWS centres from January 2019.**

Radicalisation and safeguarding

If you are concerned about an adult at risk becoming radicalised, follow the stages in our safeguarding procedure. **CAWS** does not have a statutory duty in this area but it's important to keep people safe.

The government has a counter-terrorism strategy that includes supporting vulnerable people to prevent them being drawn into terrorism. You can read [more detail on this strategy](#).

All staff and volunteers at **CAWS** will be mindful of radicalisation and report any concerns using our safeguarding adult and children policies.

Confidentiality and safeguarding

Confidentiality is one of the founding principles of Citizens Advice. It is important that our clients can trust us and know that the information they disclose to us is treated in confidence.

However, if an adviser has suspicions or has information disclosed to them about a client being abused, they have a responsibility to take action. Our principles do not override the need to protect the client from abuse.

In accordance with the principle of empowerment, the decision on whether to make a safeguarding alert should normally be discussed with the client and where possible their consent should be gained to make the alert.

However, there will situations when this confidentiality between **CAWS** and the client needs to be breached without their permission. This includes if we believe that they are in serious and immediate danger.

In these situations the wellbeing of the client or others who may be at risk takes precedent over our aim of confidentiality. Our safeguarding procedure details the process for breaching confidentiality and raising a safeguarding alert.

Mental capacity and safeguarding

We'll assume that adults have mental capacity to make informed decisions about their own safety and how they live their lives. The Mental Capacity Act 2005 is central to decisions and actions in safeguarding adults.

Where a person is able to make an informed choice in relation to a particular decision, they have a right to self-determination.

In practice, it may come to light that an adult at risk does not have capacity to make informed decisions about their own situation. One way this could occur is if an adult at risk's carer has a registered lasting power of attorney for one or more of the adult at risk's affairs. If there is reason to believe that the adult at risk is being abused, has been abused in the past, neglected or exploited by the person they attended with, it will be difficult to have a conversation with the client alone. If seeking consent would put a client in greater danger then steps can be taken without seeking consent using the safeguarding procedure. In these circumstances it is important to include the reason why consent was not sought when recording the actions taken.

If it is not clear if an adult has the capacity to make an informed decision, staff and volunteers should talk to the safeguarding lead and use the safeguarding procedure.

Factors which will be relevant in determining whether a safeguarding concern should be reported about a person who lacks capacity to make the decision themselves are if the person can't:

- understand information about the decision to be made on whether or not to report a concern because of a safeguarding reason, or
- retain that information in their minds, or
- use or weigh up that information as part of the decision making process, or
- communicate their decision (by talking, using sign language or other means)

Screening of staff and volunteers

CAWS ensures that all staff and volunteers who work in roles which are legally entitled to get a DBS check are screened. It is not legally permissible to have enhanced checks on other staff or volunteers in the local Citizens Advice. However, chief officers may choose to ask some staff or volunteers to undergo a basic check.

If a DBS check reveals a conviction for a sexual offence against a child or vulnerable adult, whenever it was committed, that individual is not suitable for that role and will not be taken on. Any other convictions will be considered on an individual basis.

Further information on the process to be followed for DBS checks can be found by speaking to your manager or in [BMIS guidance on disclosure and barring](#).

Supervision, training and safeguarding

Thorough induction training will be provided to ensure that staff and volunteers are aware of good safeguarding practice alongside the service's core values and confidentiality.

Staff and volunteers will be given regular supervision and have their training needs assessed.

Regular case checking will take place and any unusual or excessive contact with an adult at risk will be investigated.

Appropriate safeguarding training is available to all staff and volunteers. This may be in the form of:

- policy awareness sessions delivered internally
- briefing sessions by a local authority or other relevant authority
- attendance at training arranged through partner agencies.

If a staff member or volunteer is removed from their role

If a staff member or volunteer is moved or dismissed from their role because of safeguarding concerns arising from their actions or inactions, **CAWS** has responsibilities as a regulated activity provider to inform the Disclosure and Barring Service. **CAWS** will follow the guidance set out by the Disclosure and Barring service in these situations.

Working with local statutory agencies

Safeguarding Boards may carry out reviews or investigations and may require us to supply information. The boards are made up of representatives from local authorities and other statutory bodies and partner agencies.

CAWS will supply information requested by a safeguarding board under the following circumstances:

- the information must be requested for the purpose of enabling the board to perform its functions
- the person or body requested to supply the information must have functions or engage in activities such that the board considers it likely to have information relevant to a function of the board

In general, there is no bar to **CAWS** taking part in a safeguarding adults' review, a criminal investigation or a Serious Case Review if required to. This is in the context of our policy on client confidentiality, and the confidentiality process will be used.

Working with local authority commissioners

Commissioners at local authority level sometimes want to see their own safeguarding protocols reflected in the local Citizens Advice policy. Some key actions **CAWS** will consider taking are:

- before commissioning, ensuring that we are aware of the local authority designated safeguarding lead and the functions of their team, and the local Safeguarding Adults Board (England) or area-based Safeguarding Board (Wales)
- where possible before commissioning, participating in local authority safeguarding training or briefings
- before commissioning or early in commissioning, reviewing local authority safeguarding protocols to make sure our policy reflects local arrangements
- if local authority policies appear to be in conflict with Citizens Advice policies or principles, contacting our Relationship Manager to discuss ways forward

Appendix 1: Safeguarding behaviours for working with adults

Staff and volunteers at **CAWS** will demonstrate their understanding and awareness of safeguarding by exhibiting the following behaviours and standards:

Office Manual
Safeguarding Adults

Author: BMIS / EM

Date updated: 22 04 2020

Page 8 of 8

- If the client has access to third-party support, e.g. a social worker or advocate, it is advisable for that person to attend appointments at the local office, if possible.
- Staff and volunteers will never undertake a home visit for an adult at risk of, or who is experiencing, abuse or neglect unless it is in an official capacity on **CAWS** and pre-arranged.
- Home-visiting appointments will be registered at the local office, and a member of the management team must know when and where the visit is taking place, its purpose and when the adviser is due back at the office. The office should also have a contact number for the staff member or volunteer.
- If a staff member or volunteer has any concerns about visiting an adult at risk of, or experiencing abuse or neglect on their own, they will make arrangements for another staff member to go with them.
- Staff and volunteers will never transport an adult at risk in their own car, alone, unless prior arrangements have been made and approved by the safeguarding lead or in the case of a medical emergency.
- Staff and volunteers will never make any comments with sexual overtones, even in humour, or partake in any 'horse play' with an adult at risk.
- An adult at risk of or experiencing abuse or neglect will never be allowed into a staff member or volunteer's home.
- Staff and volunteers will not lend money to or borrow money or possessions from an adult at risk of or experiencing abuse or neglect. They will not agree to make any purchases, or undertake any financial transactions, on behalf of the client.
- Staff and volunteers will not engage in rough physical games - apart from structured sports activities which may be part of a community event etc.
- Staff and volunteers will not engage in sexually provocative games.
- Staff and volunteers will not allow or engage in inappropriate touching of any form.
- Staff and volunteers will not allow an adult at risk of or experiencing abuse or neglect to use inappropriate language unchallenged.
- Staff and volunteers will not make sexually suggestive comments about or to an adult at risk of or experiencing abuse or neglect, even in fun.
- Staff and volunteers will not let allegations that an adult at risk of or experiencing abuse or neglect makes go unchallenged or unrecorded.
- Staff and volunteers will not do things of a personal nature for an adult at risk of or experiencing abuse or neglect that they can do themselves.

This policy sets out how **Citizens Advice in West Sussex (North, South, East) (CAWS)** aspires to support our vulnerable clients, and the principles of how our staff and volunteers should deal with situations relating to vulnerable clients.

The aim of the policy is to improve the experience and outcome for vulnerable clients regardless of the channels they use to access our services.

The policy refers to definitions from the Financial Conduct Authority (FCA). You can find these definitions in the FCA's Consumer Credit Sourcebook (CONC).

What is vulnerability?

Vulnerability cannot be defined with a one-size-fits-all statement. It will not always be clear straight away which of our clients are vulnerable. But it is important that as an organisation we have an awareness of the potential of all of our clients to be vulnerable. The following factors could be helpful in determining if a client is vulnerable:

- Individual factors
- Wider circumstances
- Creditor or adviser action or inaction

The Financial Conduct Authority (FCA) has defined a vulnerable consumer as "someone who due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care." (Financial Conduct Authority (2015) Occasional Paper No. 8 Consumer Vulnerability: Executive summary).

Our approach to identifying and supporting vulnerable clients

As an organisation we will:

- Ensure that we remain aware of the potential for our clients to be vulnerable
- Encourage clients to feel comfortable disclosing any vulnerabilities to us
- Understand that we may need to make adjustments to our standard processes to allow vulnerable clients to request and access our services
- Take vulnerabilities into consideration in how we then provide our service to vulnerable clients

Common areas of concern

Mental capacity

The FCA defines mental capacity as "The ability to make an informed decision at a specific point in time. Clients with mental capacity to make a decision can understand, remember and weigh up information which is presented to them, and communicate their decision." (CONC 2.10.3G)

Mental capacity limitation is explained by the FCA in the following way: "people with a mental capacity limitation are **unable** to understand, remember or weigh up informed information presented to them, or to communicate a decision." (CONC 2.10.8.G)

It is important not to presume that all clients with mental health issues also have a mental capacity limitation. Mental capacity is not the same as mental health. Some clients with mental health difficulties may have mental capacity limitations, but some will not.

Mental capacity limitations can also fluctuate. For example a person with dementia may find that they have capacity in the mornings, but struggle to understand and retain information as the day progresses. In this instance we would accommodate the client by offering advice and appointments in the mornings.

- We will encourage clients to feel comfortable disclosing any potential mental capacity limitations
- We will not solely rely on clients to tell us, but will also look for indicators that a client may be lacking mental capacity
- Where we identify that a client lacks mental capacity we will take reasonable steps to establish this, document it and assist the client to make an informed decision

Disclosures of sensitive personal data

Clients in vulnerable situations will often disclose personal data. We have adopted a data protection policy. We will ensure that all staff are aware of the importance of following this policy. You can read our data protection policy here [..\Staff Handbook\2 Starting with CAWS\h Data Protection Policy.docx](#)

Clients who talk about taking their own life

There may be occasions when staff and volunteers suspect or are told by vulnerable clients that they are considering taking their own lives. We recognise that these situations may be a rarity, but that it is important that staff and volunteers are clear on what action to take.

We will ensure that staff and volunteers are aware of the importance of the following steps:

- Listening to the client, acknowledging their circumstances and feelings and making it clear we are taking them seriously
- Understanding our safeguarding policies which explain the circumstances around breaching client confidentiality and calling 999 in an emergency. You can read our policies for safeguarding adults and children here [safeguarding policy](#)

We will ensure that staff and volunteers are able to seek support following these challenging situations.

Clients with a terminal, life-threatening or long-term condition

We recognise that being told a client is suffering from a serious illness or condition can be difficult to hear. Staff and volunteers may be concerned about how to respond and the best way to support clients in these circumstances.

We will ensure that our staff and volunteers are aware of the following ways to help in these situations:

- Provide the client with advice and guidance relevant to their situation, recognising that there are likely to be areas of the client's illness or condition in which they are not experts. Staff and volunteers will be aware of their own boundaries and ensure these are communicated to the client
- Acknowledge the disclosure of a serious condition in an appropriate and sympathetic way. Ask the client if they mind talking about the situation, and if it is not an illness or condition they have an awareness of, tell the client this and ask for more information
- Be aware of the importance of listening to a client who has disclosed a serious illness or condition and taking on board what the client feels they need support with rather than presuming
- Demonstrate empathy, but avoid the use of phrases such as "I know how you feel"

Office Manual
Supporting Vulnerable Clients Policy

Author: BMIS / CC

Date updated: 31 08 19

Page 3 of 3

- Be aware that clients in these situations may have a range of emotions including confusion, anger, distress, fear, depression and sadness

We will ensure that staff and volunteers are aware of the importance of looking after their own wellbeing and that they can seek support from their line managers whenever needed.

When someone else gives us information about a client

In some situations we may receive advice from a carer or family member about a vulnerable client.

We will ensure that our staff and volunteers understand that whilst they should not discuss a client's case with anyone who does not hold the appropriate authority, this does not mean they cannot listen to the information being provided by a third party.

We recognise that disclosures from carers can be valuable. We are committed to engaging with carers and taking appropriate action, whilst ensuring that we maintain client confidentiality.

Our client confidentiality policy has more detail about this. We will ensure that all staff and volunteers are aware of the policy. You can read our confidentiality policy here [09 Confidentiality\Client confidentiality policy 16 May 2019.docx](#)

Concerns that creditors are failing vulnerable clients

If we are concerned that a creditor agency is failing vulnerable clients, we will consider requesting copies of its policies and procedures for dealing with these customers. We will then use the information provided to assist us in pursuing a client's case and also in making the creditor aware of potential breaches of the regulatory framework which states that:

"A firm must establish and implement clear, effective, and appropriate policies and procedures for:
(1) dealing with customers whose accounts fall into arrears (Note: paragraph 7.2 of ILG)
(2) the fair and appropriate treatment of customers, who the firm understands or reasonably suspects to be particularly vulnerable"

We can also consider using the creditor's complaints policy, or seeking advice from the national Citizens Advice Creditor Liaison Policy Officer.

Supporting and training staff and volunteers

We will ensure that all staff and volunteers receive appropriate training, to allow them the knowledge to effectively identify and support vulnerable clients.

We recognise that staff and volunteers may require extra advice, support and guidance when working with vulnerable clients. This support is available from their line managers in the first instance.

Review of policy

This policy will be reviewed annually. If the law changes before the policy is due for review, we will update the policy as needed.