## Policy Statement

## Purpose of Policy Statement

Dŵr Cymru Welsh Water (“Dŵr Cymru”) places a high importance on safeguarding. The safety of Children, and Adults at Risk is of paramount importance in all Dŵr Cymru’s activities. Dŵr Cymru expects that all Colleagues (defined below) have an important role to play in safeguarding the welfare of Children and Adults at Risk and preventing their abuse. Safeguarding is considered everyone’s responsibility and as such Dŵr Cymru aims to create the safest environment possible.

Throughout this Safeguarding Policy (the “Policy”), Colleagues should be taken to include: permanent employees, contractors, temporary or seconded employees, agency workers, consultants and volunteers (together ”Colleagues”).

There may be occasions where individuals, working for or with Dŵr Cymru, either in a paid or voluntary capacity, will either work or otherwise come into contact with Children and Adults at Risk.

This may occur, by way of non-exclusive examples, when Colleagues are:

* Visiting customers’ premises;
* Serving members of the public at Visitor Centres;
* Providing water sports tuition or facilitating other leisure activities at Visitor Centres;
* Education Teachers;
* Water Sports Tutors;
* Volunteering;
* Contracting;
* Attending corporate social responsibility activities;
* Providing Work Experience;
* Taking part in mentoring schemes and other volunteering activities; or
* Participating in School visits.

This Policy adopts the following definitions included in the Social Care and Wellbeing (Wales) Act 2014:

* A “**Child”** isanyone under the age of 18.
* An “**Adult at Risk**” is any adult (individual aged 18 or over) who:
  + - * Has care and support needs (these include health needs);
      * Is experiencing, or at risk of, abuse, or neglect (examples include, but are not limited to: Physical, Sexual, Financial, or Organisational abuse, Neglect, Discrimination, Exploitation, Radicalisation); and
      * Is unable to protect themselves because of their care and support needs.

**Each Colleague, whether a paid worker, a volunteer or a contractor, is expected to act proactively if worried about the welfare of a Child or Adult at Risk.**

## Background

Safeguarding Adults at Risk differs from the safeguarding and protection of Children in several ways. A key difference is that while there is a legal expectation that Children are protected from physical or psychological damage, adults who are able to make decisions for themselves (who have ‘mental capacity’) have a right to make their own choices, take risks, be free from coercion and to be consulted and involved in their own safeguarding plans. Adults without mental capacity who are unable to make important decisions for themselves have legal safeguards under the Mental Capacity Act (2005).

## Partnership

Dŵr Cymru recognises the contribution it can make to ensure that all Children and Adults at Risk feel that they will be listened to and appropriate action will be taken. We will do this by working in partnership with other agencies such as the Police, Local Authorities and Social Services (Adult and Child) in accordance with Data Protection legislation as set out in Dŵr Cymru’s Data Protection Policy

## Training

All Colleagues in Education and Visitor Centres are provided with opportunities to receive appropriate training in order to develop their understanding of Dŵr Cymru’s safeguarding procedures and the signs and indicators of abuse. This will ensure Colleagues know how to respond if there is a suspicion of abuse or a Child and/or Adult at Risk discloses abuse, and the procedure to be followed thereafter.

## Aims of Policy

The aim of this Policy is to:

* Ensure that appropriate arrangements are put in place to assist Colleagues when working with Children and Adults at Risk;
* Raise awareness of issues relating to the welfare of Children and Adults at Risk, and the promotion of a safe environment for these individuals;
* Aid the identification of Children and Adults at Risk of significant harm, and providing procedures for reporting concerns; and
* Ensure suspicions and allegations of abuse and poor practice are taken seriously and responded to swiftly and appropriately.

## Scope

All Colleagues should ensure that they read this Policy to understand the standards expected of them. It is the responsibility of individuals who work around or come into contact with Children and Adults at Risk to be aware of and understand the importance of this Policy.

Martin Driscoll is the Designated Safeguarding Lead for Dŵr Cymru.

Signature: Date: 9 July 2021

SAFEGUARDING POLICY

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## Record of Change

Issued as new procedure on 24th April 2015.

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| Issue Number & Date | Details of Change |
| 1.0. 24 April 2015 | Initial Document |
| 2.1. 22 July 2015 | 1.0 Definition of Adult at Risk inserted |
| 2.2. 22 July 2015 | Changed Header to HR (3) 48 |
| 3.0. 1 June 2016 | No Change |
| 4.0. 20 January 2020 | Substantial review undertaken |
| 5.0. 12 October 2020 | Minor amendment to reflect two Deputy DSLs reducing to one. |
| 6.0 18 May 2021 | Substantial review undertaken |
| 7.0 14 July 2021 | 4.0 - Change of DSL Lead  22.0 – Updated section on Training |
| 8.0 22 September 2022 | 5.0 – Included section on ‘Recognising and responding to customer vulnerability where customers are not deemed to be at risk, but do require additional support from Dwr Cymru’  Appendix A – included Voice Recording in title  Full review by Legal and Compliance Director/Policy Approvals Committee on 28/07/2022 and DCE 16/08/2022  20/01/2023 – Additonal bullet point added to section 1.1 (Providing Work Experience) |
| 9.0 08 September 2023 | Annual review, Nicola replaced with Gary in section 4.0 |

## Employee with Lead Safeguarding Responsibility for Children and Adults at Risk

All Colleagues are expected to report to and discuss, without delay, concerns with the designated safeguarding lead (the “DSL”). The DSL with lead safeguarding responsibility for Children and Adults at Risk is **MARTIN DRISCOLL [07468702430]** This person has a duty to take lead responsibility for raising awareness of issues relating to the safety and welfare of Children and Adults at Risk, and the promotion of a safe environment where individuals working for or on behalf of Dŵr Cymru work or come into contact with Children and Adults at Risk.

The DSL will be provided with time, funding, training, resources and support to:

* + Provide advice and support to other Colleagues on welfare and protection matters;
  + Take part in strategy discussion(s) and inter-agency meetings (where appropriate);
  + Contribute to the assessment of Children/Adults at Risk;
  + Be aware of their duties and obligations under legislation (as set out in this Policy); and
  + Refer suspected cases, when appropriate to do so, to the relevant body (such as the local authority, Disclosure and Barring Service, Police).

The DSL has day to day responsibility for all matters relating to safeguarding on behalf of Dŵr Cymru at all of its sites. If the DSL is not available, particularly during the evenings and at the weekend then Colleagues should contact the deputy DSL – **Gary Rees [07788 153684]**. This includes the expectation that the lead and deputy DSL will be aware of any concerns and ensure the procedures set out in this Policy are implemented.

## Roles and Responsibility of Colleagues

It is everyone’s responsibility to safeguard Children and Adults at Risk who visit Dŵr Cymru’s sites and use our services. Dŵr Cymru has the responsibility to ensure each Colleague is informed and trained to an appropriate level. See Appendix C – Confirmation of Receipt of Safeguarding Policy

This Policy must be reviewed at least every two years, and sooner in the event any new legislation or guidance becomes available. Colleagues are encouraged to discuss and highlight any areas that they consider requires further clarification and any training needs with their line manager or main Dŵr Cymru contact (for volunteers).

All Colleagues working in Education and Visitor Centres must sign a declaration to confirm they have read and understood this Policy.

It is important that Colleagues always work to a high standard of professional conduct and act with integrity, in order to minimise the risk of abuse from within Dŵr Cymru’s sites. It is important to create a work environment where the risk of abuse is minimised, and Children and Adults at Risk feel comfortable and safe.

It is important that all Colleagues working at Education and Visitor Centres are aware of:

* + How to recognise the different types of abuse.
  + What to do if they identify a safeguarding issue or a Child or Adult at Risk tells them they are being abused or neglected, including on specific issues such as Female Genital Mutilation (“FGM”) and PREVENT (see further below).
  + The process for making referrals to the DSL and/or the local authority’s social care department and for statutory assessments that may follow a referral, including the role they might be expected to play.
  + Our systems which support safeguarding, including this Safeguarding Policy, the Colleague Code of Conduct and the role and identity of the DSL and deputy DSL.

**Recognising and responding to customer vulnerability where customers are not deemed to be at risk, but do require additional support from Dwr Cymru**

* + Our definition of a vulnerable customer held on our data governance platform is:-
  + A customer who due to personal characteristics, their overall situation or due to broader market & economic factors, is not having reasonable opportunity to access and receive an inclusive service which may have a detrimental impact on their health, wellbeing, and finances.
  + It is important that we understand the many different factors that are likely to result in someone becoming vulnerable and adapt our services accordingly. There are many ways in which a customer may find themselves in vulnerable circumstances. It may be that they have a long-standing health condition or disability, or they may have experienced a short term change in their everyday life which makes it more difficult for them to access services in the way they need to. It is important that we recognise when this happens and do what we can to help.
  + Understanding vulnerability is everyone’s responsibility and we all have a part to play in creating great experiences for all our customers. Colleagues who work directly with customers such as those taking calls, reading our meters, or repairing our network are the ones most likely to spot signs that someone could have additional support needs.
  + Customers with particular requirements due to their age, health, medical condition, or disability can register with us to receive a service that is adapted to meet their needs. There are several adjustments we offer to customers as part of our Priority Services, which could be helpful for customers who require additional support.
  + Our front-line teams are trained to identify customer vulnerability using vulnerability triggers and can refer customers to our specialist support team by email to [SpecialistSupportTeam@dwrcymru.com](mailto:SpecialistSupportTeam@dwrcymru.com) with the customer contact details. The Specialist Support advisors are trained to talk to vulnerable customers to understand their individual circumstances and needs and ensure we are providing the most appropriate and relevant services.

## Disclosure and Barring Service (“DBS”) Checks of Colleagues

Recruitment of employees will be in line with the guidance provided within the Dŵr Cymru Recruitment Policy. This includes ensuring that the appropriate employment checks are carried out for relevant roles as set out in the Policy and recorded in SAP Success Factors (including flags to indicate roles where checks are required, covering both internal and external applicants).

All relevant Colleagues will be subject to **at least** a basic DBS check which provides information on convictions or conditional cautions considered to be “unspent” under the terms of the Rehabilitation of Offenders Act 1974. Those employees where enhanced employment checks are required will be actioned accordingly in line with the specificity of the role in relation to the scope and interaction with Children/Adults at Risk.

## Definition of Abuse Involving Children

The definition of abuse involving Children includes:

**Abuse**:

* + A form of maltreatment of a Child.
  + Somebody may abuse or neglect a Child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.
  + Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another Child or Children.

**Physical abuse**:

* + A form of abuse which 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 fabricates the symptoms of, or deliberately induces, illness in a Child.

**Emotional abuse**:

* + The persistent emotional maltreatment of a Child such as to cause severe and adverse effects on the Child’s emotional development. It may involve conveying to a Child that they are worthless or 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 or ‘making fun’ of what they say or how they communicate.
  + It may feature age or developmentally inappropriate expectations being imposed on Children.
  + It may include interactions that are beyond a Child’s developmental capability as well as overprotection and limitation of exploration and learning or preventing the Child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.
  + It may involve serious bullying (including cyberbullying), 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, although it may occur alone.

**Sexual abuse**:

* + Involves forcing or enticing a Child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether 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.
  + It may also include non-contact activities, such as involving Children in looking at, or in the production of, sexual images, watching sexual activities, encouraging Children to behave in sexually inappropriate ways, or grooming a Child in preparation for abuse.
  + Sexual abuse can take place online, and technology can be used to facilitate offline abuse.
  + Sexual abuse is not solely perpetrated by adult males.

Women can also commit acts of sexual abuse, as can other Children. The sexual abuse of Children by other Children is a safeguarding issue which may tend to arise in an educational context.

**Neglect**:

* + 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 involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a Child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment.
  + It may also include neglect of, or unresponsiveness to, a Child’s basic emotional needs.

**Peer on peer abuse:** All Colleagues should be aware that Children can abuse other Children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

* + **bullying** (including cyberbullying);
  + **physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
  + **sexual violence**, such as rape, assault by penetration and sexual assault;
  + **sexual harassment**, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
  + **upskirting**, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
  + **sexting** (also known as messages containing either sexual imagery or innuendo sent to a Child); and
  + **initiation/hazing** type ceremony and rituals.
* **Radicalisation**:
  + - exposing a child to extremist ideas which could lead them to be drawn into terrorism (see PREVENT below).

**The above is a non-exhaustive list and there may be other forms of abuse, or examples of abuse, which require action under this Policy. If in doubt, seek advice from the DSL.**

## Definition of Abuse Involving Adults at Risk

The definition of abuse involving an Adult at Risk, includes:

* **Physical abuse**:
  + - including hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
* **Sexual abuse**:
  + - including rape and sexual assault or sexual acts to which the Adult has not consented or was pressured into consenting to.
* **Psychological abuse**:
  + - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
* **Exploitation:**
  + - either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain.
* **Financial or material abuse:**
  + - including theft, fraud, exploitation, 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.
* **Neglect and acts of omission**:
  + - including ignoring medical 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.
* **Discriminatory abuse**:
  + - including discrimination on grounds of race, gender and gender identity, disability, sexual orientation, religion, and other forms of harassment, slurs or similar treatment.
* **Organisational abuse**:
  + - including neglect and poor care practice within an institution or specific care setting like a hospital or care home, for example. This may range from isolated incidents to continuing ill-treatment.
* **Radicalisation**:
  + - exposing an adult to extremist ideas which could lead them to be drawn into terrorism (see PREVENT below).

**Adult abuse also includes**:

* **Disability Discrimination:**
  + - when you are treated less favourably or put at a disadvantage for a reason that relates to your disability under the Equality Act 2010.
* **Hate Crime**:
  + - a crime, typically one involving violence, that is motivated by prejudice on the basis of race, religion, sexual orientation, or other grounds.
* **Domestic Abuse including:** 
  + - **Forced Marriage:** 
      * a marriage in which one or more of the parties is married without their consent or against their will.
    - **Honour-Based Violence:**
      * a collection of practices used to control behaviour within families in order to protect perceived cultural and religious beliefs and/or honour.
    - **Controlling or Coercive Behaviour in an Intimate or Family Relationship.**
* **Female Genital Mutilation**
* **Human Trafficking:**
  + - the trade of humans for the purpose of forced labour, sexual slavery, or commercial sexual exploitation for the trafficker or others.
* **Mate Crime:**
  + - a form of crime in which a perpetrator befriends a vulnerable person with the intention of then exploiting the person financially, physically or sexually.
* **Modern Slavery:**
  + - includes the crimes of human trafficking, slavery and slavery-like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of Children, and debt bondage.
* **Restraint:**
  + - unlawful or inappropriate use of restraint or physical interventions.

**The above is a non-exhaustive list and there may be other forms of abuse, or examples of abuse, which require action under this Policy.**

## Female Genital Mutilation (FGM) – Obligation on Teachers

Whilst all Colleagues should speak to the DSL about any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

Professionals working within Wales should be aware that section 130 of the Social Services and Wellbeing (Wales) Act 2014 also applies to cases covered by the FGM mandatory reporting duty. The all-Wales Child protection procedures, adopted by all safeguarding boards in Wales, provide a consistent framework for referral, consideration, and determining action by all safeguarding partners in Wales, including a dedicated protocol on FGM. It requires “relevant partners” (such as teachers) to inform the local authority where they have reasonable cause to suspect that a Child within the local authority’s area is a Child at risk of or been exposed to FGM.

To comply with both duties, professionals in Wales who identify cases falling within the FGM mandatory reporting duty need to make a report to both the police and the local authority.

Teachers or other relevant professionals who fail to comply with the reporting obligation relating to FGM may be subject to disciplinary action by the relevant School/local authority they are associated with or by Dŵr Cymru. It is possible a referral may be made to the Education Workforce Council for further consideration

## PREVENT

Any teaching staff engaged by or on behalf of Dŵr Cymru are under a statutory obligation to take steps to prevent or report suspicions of pupils becoming radicalised and/or drawn into terrorism.

We also expect other Colleagues to remain vigilant and seek guidance and support from the DSL if there is a concern.

Radicalisation can be difficult to spot. Signs that may indicate a Child or Adult at Risk is at risk of being radicalised or drawn into terrorism include:

* + isolating themselves from family and friends;
  + talking as if from a scripted speech;
  + unwillingness or inability to discuss their views;
  + a sudden disrespectful attitude towards others;
  + increased levels of anger; or
  + increased secretiveness, especially around internet use.

## Equality Statement

Some Children and Adults at Risk, due to specific personal or family circumstances are at an increased risk of abuse and may face additional personal or societal barriers with respect to raising or disclosing such abuse.

We aim to ensure that all Children and Adults at Risk are not treated less favourably, regardless of age, disability, gender reassignment, marriage, pregnancy, race, religion/belief and sex/ sexual orientation.

## Good Practice Guidelines for Individuals who work with Children and Adults at Risk

All individuals should demonstrate exemplary behaviour in order to promote the welfare of Children and Adults at Risk. The following are examples of how to create a positive culture and climate when working with Children and Adults at Risk:

* + Always work in an open environment (e.g. avoid private or unobserved situations and encourage open communication with no secrets);
  + Maintain a safe and appropriate distance when working with Children and Adults at Risk;
  + Avoid spending time alone with Children and Adults at Risk away from others;
  + Do not take Children/Adults at Risk on any journeys alone i.e. by car etc.;
  + Do not provide Children or Adults at Risk with personal contact details or contact them outside of official channels (e.g. do not befriend or contact Children or Adults at Risk through social media channels);
  + Do not publish information, in print or on a website that may enable someone to contact a Child/Adult at Risk;
  + Treat all Children and Adults at Risk equally and with respect and dignity;
  + Always put the welfare of Children and Adults at Risk first;
  + Be an excellent role model - this includes not smoking (or vaping) or drinking alcohol in the company of Children and Adults at Risk;
  + Give enthusiastic and constructive feedback rather than negative criticism;
  + Recognise the developmental needs and capacity of Children and Adults at Risk - avoid excessive support, guidance or training and do not push them against their will or outside of their ability;
  + Act upon and record any allegations made by a Child or Adult at Risk;
  + Never do things of a personal nature for Children and Adults at Risk;
  + Always challenge attitudes and/or behaviours that contravene this Policy or our Code of Conduct;
  + Never trivialise allegations of abuse, exploitation or harassment in any way; and
  + Do not photograph or video Children/Adults at Risk or publish pictures, without the knowledge or consent of their parent/guardian. Remember that consent can be withdrawn at any time. (Please see Section 24 and Appendix A for further guidance).

## Do Not Promise to Keep Secrets

When a Child or Adult at Risk makes an allegation of abuse, they may hope that the abuse will stop without further enquiries. They may fear for their family or retribution from the abuser.

They should be helped to understand why the referral (to the DSL) must be made and what is likely to happen as a result. It is important to reassure the Child or Adult at Risk, but he/she must not be told that their allegation will be treated confidentially or that the information will be kept a secret.

It is good practice to state the information disclosed will be treated sensitively, but it may be necessary for information not to be kept secret to protect the relevant Child or Adult at Risk.

## Procedure for Dealing with Disclosure of Allegations of Abuse and Reporting Concerns

If a Child or Adult at Risk tells you about possible abuse or discloses issues which indicate potential abuse, you should:

* + Listen carefully and stay calm;
  + Not interview the Child or Adult at Risk, but question normally and without pressure, in order to be sure that you understand what the Child or Adult at Risk is telling you;
  + Not put words into the Child or Adult at Risk's mouth;
  + Reassure the Child or Adult at Risk that by telling you, they have done the right thing;
  + Inform the Child or Adult at Risk that they must pass the information on, but that only those that need to know about it will be told;
  + Inform them of the identity of the individual(s) to whom you will report the matter;
  + Note the main points carefully;
  + Make a detailed note of the date, time, place, what the Child or Adult at Risk said, did and your questions;
  + You should not investigate concerns or allegations of abuse but should report them **immediately** to the DSL; and
  + If you are alerted to concerns or receive an allegation of abuse regarding another individual working for or on behalf of Dŵr Cymru, you should report this immediately to the DSL.

## Why is all this Important?

It is important for Children and Adults at Risk to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of poor practice include:

* + Failing to act on and refer the early signs of abuse and neglect;
  + Poor record keeping;
  + Failing to listen to the views of the Child or Adult at Risk;
  + Failing to re-assess concerns when situations do not improve;
  + Not sharing information;
  + Sharing information too slowly; and
  + A lack of challenge to those who appear not to be acting.

## Raising a Concern

It is Dŵr Cymru’s aim to not only create a safe environment where concerns are dealt with quickly and properly, but to make all Colleagues feel able to report their concerns. The keeping of accurate and prompt recording is fundamental to effective safeguarding and all Colleagues have a responsibility to ensure all concerns are recorded appropriately.

If a Colleague has a concern, they should report directly, and without delay to the DSL or Deputy DSL by completing the form at **Appendix B**. A reporting form requires a Colleague to provide a detailed written account of what they have seen, observed or heard. The Colleague who noted or raised the concern will be known as the “Alerter”. This requires those who raise concerns to make a written record using the **form attached on Appendix B**. This must be as soon as possible after raising concern with the DSL, the DSL can provide support in completing the form.

The DSL or deputy DSL will normally be responsible for making any referrals to the Police or local authority (but see Section 16.2 below). The Police or local authority may wish to speak to the Alerter.

Records must be factual and clear, and where opinion is expressed, it should be recorded as such and distinguished from fact.

When reporting a concern to the local authority, the DSL will inform the local authority that a written record of the concern(s) is available and will e-mail details of the concerns to the local authority.

If at any stage the local authority decide that no further action is to be taken, then the reason for this and who made the decision will be recorded.

Colleagues that have concerns about the conduct of individuals in a position of trust within Dŵr Cymru which could be detrimental to the safety or wellbeing of Children or Adults at Risk should raise them in accordance with this Policy.

However, if, for whatever reason, Colleagues feel unable to raise them under this Policy they should refer to [Dŵr Cymru’s Whistleblowing Policy](https://dwrcymru.sharepoint.com/:w:/r/Policies/Whistleblowing%20Policy.docx?d=wbdbe9d3fc64c4e35b11b5c0803fb678c&csf=1&web=1&e=DDXVpI). The Whistleblowing Policy is intended to encourage and enable Colleagues speak up and raise their concerns and to do so without fear of victimisation or discrimination.

## Concern Received from the General Public

Where concerns are raised by a member of the public, the Appendix B form must be completed and passed to the DSL **immediately**.

## If a Child or Adult is in Immediate Risk

This would require a Colleague to make a referral to the DSL, marking it as Urgent (See attached form, Appendix B) or in an emergency, making a verbal report to the DSL. This must be completed as soon as possible.

Colleagues can make a referral to the local authority or the police themselves, and immediately if they believe a Child or Adult at Risk is suffering or is likely to suffer immediate harm or danger.

Colleagues can find details of appropriate agencies from the following link: [https://www.gov.uk/report-Child-abuse-to-local-council](https://www.gov.uk/report-child-abuse-to-local-council)

## If you Have Concerns about Extremism

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321, if you:

* Think someone is in immediate danger.
* Think someone may be planning to travel to join an extremist group.
* See or hear something terrorist-related.

In other cases, and where possible, speak to the DSL first to agree a course of action. If the DSL or deputy DSL is not available, this should not delay any action being taken. Speak to a member of the Executive team (DCE).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This can include Channel (See <https://www.gov.uk/government/publications/channel-guidance>), the government’s program for identifying individuals at risk of being drawn into terrorism, or the local authority’s social care team.

For teachers: The Department of Education has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk) (NB. For non-emergency matters).

## Confidentiality and Data Protection

The DSL has responsibility to ensure all concerns within Dŵr Cymru are recorded, monitored and secured.

Dŵr Cymru’s Data Protection Policy requires that all personal data and “special category” data, including in relation to Children or Adults at Risk, is collected, stored and processed in accordance with Dŵr Cymru’s obligations under the General Data Protection Regulation (GDPR) and the provisions of the Data Protection Act 2018.

## Initial Fact Finding

It may be appropriate/ necessary to check some basic facts prior to alerting other professionals. Initial fact finding may involve the DSL checking files and recent records and clarifying basic facts with key Colleagues, including the Alerter, as well as discreetly asking other Colleagues who have had recent contact with the Child and Adult at Risk to ascertain if they have any issue or concerns.

The Child or Adult at Risk should never be asked to discuss the concerns or repeat disclosure of an allegation that has already been made.

After initial fact finding has taken place the DSL may decide that there are no concerns that warrant a referral to the local authority or the police. All decisions made by the DSL will be recorded.

## Raising the Concern to Appropriate Services

It is for the DSL to refer concerns to the local authority. However, if there is a risk of immediate harm, Colleagues may make a referral (see Section 16.2 above).

All confidential correspondence must be sent by secure means, such as encrypted communication or password protection.

When there are concerns that a crime has been committed, then the police should also be informed.

## Making a Referral to the Local Authority

Referrals must be made on the same day where harm or risk of harm has been identified. If concerns arise out of hours, referrals must be made to the local authority’s out of hours service on the same day if possible.

**For a Child:**The DSL or Colleague must make a referral to the local authority’s Children’s social care services team which will be communicated by telephone and in writing via a secure email.

Where appropriate, the DSL or Colleague should discuss their concerns with the Child’s parent (or guardian) and notification of a referral to the local authority should be made. Colleagues must only do this if it does not increase the risk of harm to the Child (either through delay, or the parent’s (guardian’s) reactions).

If the DSL or Colleague decide not to seek parental (guardian) permission before making a referral to Children’s social care, they must record the date/ time and their reasons (please see “additional notes” on **Appendix B**).

## Referral Responses; what to expect from the Local Authority

**For a Child:**Children’s social services are required to provide referrers with a response within 24 hours of receiving a referral and acknowledge receipt to the referrer.

**For an Adult:**Adult social care services do not have a statutory obligation to respond within a specified timeframe. Local response timeframe targets may operate; these are available on each individual local authority’s Safeguarding Adults Board website.

## Training and Implementing Safeguarding Policy and Procedures

All Colleagues working at Education and Visitor Centres will undertake safeguarding and Child protection training at induction. A competence assessment will be part of the training via passing an online test, this will confirm they have understood the policy. Training records will be retained by the talent team. Colleagues will receive bi-annual refresher courses. Any updates to safeguarding and Children protection will be shared as required, (for example, through emails, e-bulletins and team meetings). All training updates will be consistent with current legislation and guidance.

## Important Numbers

|  |  |
| --- | --- |
| Emergency | **999** |
| Non-Emergency | **101** |
| Anti-Terrorism Hot Line | **0800 789 321** |
| Department of Education - Anti Extremism Hotline | **020 7340 7264** |
| NSPCC NSPCC (FGM helpline) | **0808 800 5000 0800 028 3550** |
| Childline | **0800 1111** |
| FORWARD (FGM Advice Charity) | **0208 960 4000** |

## Guidance for Photographing and Filming

It’s important that Children and young people feel happy with their achievements and have photographs and films of their special moments. Family and friends also want to be able to share the successes of their Children when they have been part of a special event or activity.

However, some Children, Adults at Risk, parents (guardians) or carers may not be comfortable with images of themselves or their relatives being shared. For example:

* + If a Child and/or their family have experienced abuse they may worry about the perpetrator tracing them online.
  + Children who choose not to have contact with some members of their family may decide to minimise their online presence.
  + Families may have religious or cultural reasons for choosing not to be photographed.

If we suspect an individual is taking inappropriate photos or filming of a Child or Adult at Risk, we will ask that person to stop taking images. We may ask them to leave and we may also report the incident to the police. If in doubt seek further guidance from the DSL.

Further information is available in Dŵr Cymru Guidance on Photography and Images at Welsh Water locations, available on our [website](https://corporate.dwrcymru.com/en/news-media/our-press-office).

Please find a Consent form at Appendix A. It must be remembered that consent to be photographed or filmed can be withdrawn at any time.

## Appendix A – Photography, Voice Recording and Filming – Consent Form

To be completed by the Child’s/Adult at Risk’s parent/guardian/carer

Dŵr Cymru Welsh Water would like to take your Child’s photograph for promotional purposes. These images may be sent out to the media with a press release, used for our publications or on our website.

**Filming, photography and voice recording – Children and Adults at Risk**

As the parent / guardian / carer of …………………………………..………….. (name of person you are providing consent for), I consent to the use of photograph(s)/ video and voice recording(s) taken by Dŵr Cymru Welsh Water employees or by agents authorised on behalf of Dŵr Cymru Welsh Water

on ……………………………………………………………………………………..………(date)

at ……………………………………………………………………………………(location/ event)

for the **purpose** of appearing in Dŵr Cymru Welsh Water’s printed and electronic publications, presentations, promotional materials, the company’s website, internal TV channel and displays in company buildings, in the advertising of the company’s goods or services, print and broadcast media and social media.

**Conditions of use**

* This form is valid for three years. The photo(s) / video and voice recording(s) will be deleted after three years, unless we feel the material has historic significance.
* We will not use the photographs/video or voice recordings for any other purposes than those indicated above.
* We will not include personal information (such as names, home address or telephone number) on our website, printed material or other materials, unless otherwise agreed with the person or their guardian/carer.
* We will store copies of the photographs/video and voice recordings used for the purpose stated above.
* We will retain this consent form in case it is needed to contact you.
* We may transfer the photographs /videos and voice recordings outside of the European Economic Area (EEA) or store them in a location outside of the EEA for the purposes stated above.
* In some circumstances we may also share photographs, video and voice recordings with our partners in the alliance and/or supply chain for inclusion in their own publications and websites.

I consent to Dŵr Cymru Welsh Water taking and using the photograph/video and voice recording of the person I have given consent for, for the **purpose** and **condition of use** stated above:

Signature……………………………………………………………………………………………..

Print name…………………………………………………………………………………………………

Date …………………………………Mobile / Phone number…………………………………

Email address or home address …………………………………………………………………………………………………………

Relationship to person(s) in the photography/footage/ recording …….……………………………………………..

Although Dŵr Cymru Welsh Water will now own this imagery/ footage/ recording you can contact us to withdraw your consent at any time please email [press@dwrcymru.com](mailto:press@dwrcymru.com) or phone 01443 452452.

## Appendix B – Safeguarding Response Form

*Use this form to record any concern about the welfare of a Child or Adult at Risk. Before completing the form, contact the designated safeguarding lead (Details are as stated above).*

*If you suspect a Child or Adult may be at risk of abuse, or neglect, or you have received a disclosure of abuse from a Child or an Adult, or you have heard about an allegation of abuse or witnessed abuse, you must report it to the designated safeguarding lead as soon as possible, where possible, within the hour.*

**URGENT? YES NO (Please Circle)**

Alleged victim is a: CHILD ADULT AT RISK (Please Circle)

Your Name and Position

Full name of the individual you are concerned about (if known).

If you don’t have details about the individual, please give any useful information you have (consider whether CCTV or colleagues may be able to help).

Date and time of the record.

Why are you concerned?

What have you been told, observed, by who and when?

*Please give a detailed and clear description, distinguishing fact from opinion and outlining the following:*

* *Anything you witnessed personally.*
* *Information from a third party.*
* *Anything you have been told by the Child or Adult at Risk (please be clear).*

If an allegation has been made, please give details.

Have you spoken to the Child/ Adult at Risk? YES NO (Please Circle)

What did they say? (In their own words)

Have you spoken to others regarding your concern? YES NO (Please Circle)

Who?

Is this the first time you have been concerned about this individual?

*Further details*

Has any action already been taken in relation to this concern (example: first aid, police called, restraint)?

Has this record been handed to anyone other than the designated safeguarding lead (DSL) or deputy DSL?

*(Please explain why?)*

*Full name*

*Signature*

*Name of DSL or Deputy DSL*

*Signature*

*Date and time*

*Additional Notes (If you needed additional pages, please stable to this document)*

## Appendix C – Confirmation of Receipt of Safeguarding Policy

Dŵr Cymru Welsh Water (“Dŵr Cymru”) is committed to ensuring that colleagues, including: permanent employees, contractors, temporary or seconded employees, agency workers, consultants and volunteers who work or come into contact with Children or “Adults at Risk” are aware of the appropriate arrangements or good practice guidelines set out above.

The safety of Children and Adults at Risk is of paramount importance in all Dŵr Cymru activities. Dŵr Cymru expects all colleagues to play an important role in safeguarding the welfare of Children and Adults at Risk and preventing abuse.

By joining or working with Dŵr Cymru you agree to abide by its policies and procedures. It is recommended that you regularly update yourself with the attached Safeguarding Policy.

I have read and understood Dŵr Cymru’s Safeguarding Policy.

Signed:

Print:

Date: