

# SAFEGUARDING POLICY

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## **1. CONTEXT AND SCOPE.**

- 1.1 Careers Wales provides a variety of opportunities for children, young people, and adults to participate in career advice, guidance, and related activities.
- 1.2 Careers Wales recognises its responsibility to safeguard children, young people and adults at risk who use its services. Everyone who has contact with children, young people and adults at risk, has a role to play in safeguarding and promoting their welfare. Careers Wales is committed to establishing and maintaining a culture that allows its employees to recognise and report concerns.
- 1.3 The policy has been prepared to comply with the relevant legislation in Wales. The [Social Services and Wellbeing \(Wales\) Act 2014](#) provides the legal framework for improving the well-being of people in Wales who need care and support. This legislation is supported by other relevant legislation listed in [Appendix 2](#).
- 1.4 Careers Wales will comply with the Wales Safeguarding Procedures, Keeping Learners Safe as well as local procedures produced by the Regional Safeguarding Boards (LSCB) in Wales.
- 1.5 This policy also takes into consideration the responsibility of Careers Wales, in relation to its duty within the Prevent Strategy concerning the protection of individuals who are at risk of being exposed to extremism.

## **2. AIMS.**

- 2.1 The overall aim of this policy is to protect and promote the welfare and well-being of children, young people, and adults at risk, with whom Careers Wales employees come into contact.
- 2.2 Discrimination in all its forms is unacceptable and everyone who comes into contact with Careers Wales employees will be treated with dignity and respect, in accordance with the Equality Act 2010 and the Careers Wales dignity and respect policy.
- 2.3 This policy will support Careers Wales employees in safeguarding the welfare of children, young people, and adults with whom they work, and in safeguarding themselves against allegations.
- 2.4 This policy encourages employees to refer any concerns regarding Safeguarding to the Designated Senior Safeguarding Person(s), the Director of Customer Strategy and Service Development and if the matter remains unresolved, employees are referred to the Careers Wales Whistleblowing Policy.

## **3. OUTCOMES.**

- 3.1 Careers Wales recognises that:
  - Safeguarding and welfare of its customers is paramount and takes precedence over all other considerations.
  - It has an obligation to promote the health, safety and well-being of its employees and has a responsibility to ensure that safeguarding disclosures, allegations or concerns are dealt with in a fair, consistent, and timely manner and in accordance with statutory guidance.



- All issues relating to online safeguarding will be dealt with in the same way as face-to-face interaction and contact with children, young people, and adults at risk.
- 3.2 Where Careers Wales receives a safeguarding disclosure, allegation or concern relating to an employee, this will be dealt with in accordance with the Careers Wales Safeguarding Procedure.

Careers Wales will ensure that there is appropriate support, information, and advice for all those affected during this process. The relevant Local Authority Designated Officer for Safeguarding (LADO) will advise on action to take; through direction by the Police/Social Services. At the earliest opportunity and without prejudicing an investigation, the member of staff should be informed of the allegations.

- 3.3 Any employee subject to an allegation (and the whistle-blower) will be given access to independent support services if they so wish. Where an investigation is not pursued, Careers Wales may determine to instigate disciplinary action.
- 3.4 Careers Wales will notify the Welsh Government and the Disclosure and Barring Service when an employee is dismissed on grounds of misconduct or resigns in circumstances which would have led to dismissal.

#### **4. Definitions.**

4.1 For the purpose of this policy, the following definitions apply:

- The term 'employee' applies to all full-time and part-time, permanent, or temporary Careers Wales employees, and for the purpose of this policy only, covers agency staff, and those on placement with Careers Wales.
- The term 'relevant employees' for the purpose of this policy applies to all employees who are expected to have unsupervised contact with young people or adults.
- Regulated activity is activity involving relevant contact with children or adults and is of a specified nature on a frequent, intensive (3 or more days in any 30-day period) overnight basis.
- 'Volunteers' are representatives from local business and community agencies who are identified by Careers Wales to support activities with young people in centres of learning.

4.2 For the purpose of this policy the following definitions apply:

- A child or young person is any person below the age of 18.
- A child or young person at risk is an individual under the age of 18 years who is experiencing or is at risk of, abuse, neglect, or other kinds of harm; and who has needs for care and support (whether or not the local authority is meeting any of those needs).
- An adult at risk is an individual aged 18 and over who:
  - Is experiencing or is at risk of abuse or neglect.
  - Has needs for care and support (whether the authority is meeting any of those needs or not).
  - As a result of those needs is unable to protect themselves against the abuse, or neglect, or the risk of it.



- 4.3 The use of the term 'at risk' means that actual abuse or neglect does not need to occur so that early interventions and help to protect a child, or adult at risk, should be considered to prevent actual abuse and neglect.
- 4.4 Careers Wales recognises that the [Mental Capacity Act 2005](#) (MCA) is designed to promote and safeguard decision-making within a legal framework, and is underpinned by five key principles. The MCA protects and empowers people to make decisions for themselves wherever possible and applies to people aged 16 and over. Every person, subject to the MCA, has the right to make their own decisions, and must be assumed to have capacity to do so unless it is proved otherwise.

## **5. STANDARDS AND PRINCIPLES.**

- 5.1 This policy applies equally to children, young people, and adults at risk.
- 5.2 Careers Wales has in place a 'Code of Conduct - Standards in Public Life' which all employees are expected to follow. Under this Code, Careers Wales expects all employees to protect the children, young people, and adults with whom they are working by reporting concerns promptly. A failure to do so will be an act of omission on the employee's part. [The Social Services and Wellbeing \(Wales\) Act 2014](#), places a duty on relevant partners of a local authority, to report children and adults when there are concerns that they are 'at risk of harm'.
- 5.3 Information Sharing - Effective sharing and exchange of relevant information between professionals is essential to safeguard children, young people, and adults.
- Employees must not guarantee confidentiality to anyone who discloses abuse.
  - It should be noted that in certain circumstances full disclosure may be ordered by a judge or ombudsman.
  - Professionals in attendance at any meetings held as part of the adult protection process should sign up to, and adhere to, the meeting's confidentiality statement.
- 5.4 For details of how to share information in a safeguarding situation, see: [Social Services and Wellbeing \(Wales\) Act 2014](#)

### **Guidance.**

- 5.5 Our work in learning settings is delivered in the context of the most recent guidance -
- [Working Together to Safeguard People: Volume 5 – Handling Individual Cases to Protect Children at Risk](#)
- [Working Together to Safeguard People: Volume 6 – Handling Individual Cases to Protect Adults at Risk](#)
- [Keeping Learners Safe – The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002 \(2022\)](#)

- 5.6 The purpose of this policy is to ensure effective safeguarding procedures are in place in all education and advice settings, including careers, working from home and outreach settings. Ensure they have



effective safeguarding systems in place, and have robust arrangements to safeguard and promote the well-being of children, young people, and adults in Wales. The policy is also relevant for agencies that supply staff to the education and advice sector. This includes contractors who work in education or advice establishments, providers of education, and training for those under the age of 18 (including pupil referral units, further education institutions and independent schools). In addition, the policy is also relevant for ITE Partnerships who are required to ensure that all student teachers are provided with specified periods of school experience for schooled training.

## **6. MANAGEMENT RESPONSIBILITIES.**

**(Further details are provided in the Safeguarding procedures)**

- 6.1 Careers Wales recognises that the statutory responsibility for the welfare of children and adults is that of the relevant Local Authority Social Services Department and the Regional Safeguarding Boards for children and adults at risk.
- 6.2 Safeguarding within Careers Wales is the ultimate responsibility of the Senior Management Team.
- 6.3 The Director of Customer Strategy and Service Development will be the Designated Senior Officer and lead on behalf of the Senior Management Team and the CCDG Board and will be accountable for Safeguarding matters.
- 6.4 The senior management team has responsibility for ensuring that this policy and associated procedures are adhered to.
- 6.5 Team Managers will deal with immediate referrals and involve their line Manager as noted in the procedures.
- 6.6 All Careers Wales employees are expected to be aware of this policy and apply it in practice.
- 6.7 It is everyone's duty to conduct themselves in a manner which safeguards and promotes the welfare of children and adults at risk. This also protects them against false allegations and misconduct.
- 6.8 Careers Wales does not expect employees to become experts in identifying harm, abuse and neglect. The Categories of abuse listed are illustrative. Employees should be aware of the definitions of harm in the Wales Safeguarding Procedures <https://www.safeguarding.wales/>

### **Categories of Abuse.**

- 6.9 The following is a non-exhaustive list of examples for each of the categories of harm, abuse, and neglect, which Careers Wales has identified:
  - **Physical abuse** is the deliberate use of physical force that may result in bodily injury, physical pain, or impairment. Physical harm may also be caused when a caregiver fabricates or induces illness in an individual whom they are looking after. This also covers Female Genital Mutilation.
  - **Sexual abuse** involves forcing or enticing a child, young person, or adult, to take part in direct or indirect sexual activities to which they are unwilling or unable to give informed consent, or which they



do not fully comprehend. The activities may involve physical contact, including penetrative or non-penetrative acts.

- **Emotional or psychological abuse** is the willful, and sometimes persistent ill treatment of a child, young person, or adult resulting in mental suffering. It may involve conveying to a child, young person, or adult that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on them. It may involve causing them frequently to feel frightened or in danger, for example by witnessing domestic abuse within the home, or being bullied, or the exploitation or corruption of a child, young person, or adult. Some level of emotional abuse is involved in all types of ill treatment of a child, young person, or adult, though it may occur alone.
- **Financial or material abuse** is any theft or misuse of a child, young person or adult's money, property, or resources. It may involve coercion and/or intimidation and may include limiting access to money or other resources, or by forcing financial responsibility onto the child, young person, or adult by a person in a position of, or expectation of trust to a child, young person, or adult.
- **Neglect** is the persistent failure to meet a child, young person, or adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. It may involve a parent or carer failing to provide adequate food, shelter, and clothing. Failing to protect them from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, their basic emotional needs. In addition, neglect may occur during pregnancy because of maternal substance misuse.

### Other forms of abuse.

6.10 Careers Wales is committed to protecting and promoting the welfare of children, young people, and adults at risk, by informing Social Services if the following is identified during the course of its work:

- **Discrimination and Hate Crime.** This may be a feature of any form of abuse of a child, young person or adult but can also be motivated because of their age, gender reassignment, sex, race (including ethnic or national origin, colour or nationality), disability, pregnancy and maternity, sexual orientation, religion, or belief (including lack of belief).
- **Domestic Abuse.** This can occur in interpersonal relationships and can have a traumatic and sometimes life-threatening effect on an individual and others living in the household.
- **Forced Marriage.** This is defined as a marriage conducted without the valid consent of both parties to the marriage, and where some form of duress is involved.

6.11 In respect to Safeguarding individuals at risk of extreme points of view, Careers Wales assumes the same approach as safeguarding in other contexts (see [Appendix 1](#)). For safeguarding related to extreme points of view, Careers Wales employees should seek support from the Channel Panels where they exist. Counter Terrorism Policing Wales have published the [All Wales Prevent Partners Referral Form](#) to create a clearly defined single referral mechanism across all public authorities in Wales, to improve the confidence of each authority, to mitigate against threat and reduce risk by safeguarding, those who need support.

6.12 Careers Wales will consult with the relevant Local Authority Designated Officer if they are concerned about whether a specific matter is a safeguarding concern, as set out in the Safeguarding Procedures.



## 7. CORPORATE IMPLICATIONS.

### Recruitment and Vetting.

7.1 Careers Wales has in place Recruitment and Selection Policy and Procedures including vetting procedures that comply with the Welsh Government's guidelines (issued from time to time) and will take all reasonable precautions to avoid the appointment of unsuitable persons to posts that will have contact with young people or adults. DBS checks are carried out on appointment of new Careers Advisers who work within Service to Young People and Working Wales. Renewed DBS checks will be carried out for those in the above roles, if they have had an absence period of more than 3 months e.g. have been on maternity, extended paternity or on a career break. Please refer to the above policy for further details relating to vetting and Disclosure and Barring Service (DBS) checks.

7.2 The Careers Wales Discipline and Grievance policy states:

*In certain circumstances, e.g. child protection related dismissals, the dismissal may fall within the statutory duty to report the employee's conduct to the Safeguarding Authorities. In such cases the Police and Social Services may also report the matter to the Safeguarding Authority and their investigations will take precedence over any Company investigation.*

Careers Wales also has a statutory duty to report the dismissed employee to the Disclosure and Barring Service DBS. <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>

### Training for Careers Wales Employees.

7.3 Careers Wales is committed to ensuring that managers and employees receive safeguarding training at the appropriate level. Managers need to also be familiar with whistle-blowing procedures, discipline and grievance and the relevant legislation. Careers Wales employees will be trained to be aware of the potential signs of extremist views and behaviours.

Learning and development will include:

- All Careers Wales employees will receive a short, bilingual eLearning package on safeguarding issues to ensure they can identify obvious safeguarding issues and respond appropriately.
- All employees who will be working on a one-to-one basis with children, young people and adults will receive level 2 awareness, recognition, and referral training every three years. This is initially a one-day course, followed by a half day refresher three years later.
- Team Managers and managers who regularly work from customer-facing offices will receive level 3 training relating to their roles and responsibilities.
- All employees will receive training on how employees should deal with safeguarding related to the Prevent strategy, through Home Office approved eLearning.
- Depending on their roles, employees will be offered training and learning activities on related topics, such as Personal Safety, Domestic Abuse Awareness, Drug and Alcohol Awareness, Mental Health Awareness and ACE Awareness, FGM Awareness, Forced Marriage Awareness.

In total, this will add up to a day of training every three years for employees who have unsupervised contact with customers.



- 7.4 Refresher and update training should be undertaken by all employees listed above at intervals of no more than three years. This training will draw on findings from new research, best practice and learning from experience, locally and nationally. It will reflect any changes to legislation and guidance and be adapted to the role/responsibilities of the groups of employees.
- 7.5 This will be monitored by the Director of Customer Strategy and Service Development in collaboration with the Head of Quality and Planning.

### **Other Groups/Individuals who work with Careers Wales.**

- 7.6 Any volunteers/speakers, who are identified by Careers Wales to support its work in centres of learning, should adhere to the centre's own safeguarding procedures. No volunteers/speakers should undertake unsupervised activities with groups of learners.
- 7.7 Employers participating in work experience placements will not usually require DBS checks. If Careers Wales identifies employers who offer work experiences with learners who are below minimum school leaving age, the guidelines outlined on the HSE website will be adhered to. [www.hse.gov.uk/youngpeople/workexperience](http://www.hse.gov.uk/youngpeople/workexperience).
- 7.8 If Careers Wales provides placement activities for college and university students who are undertaking a guidance qualification, students who are likely to have one to one contact with children, young people or adults at risk will be required to present their DBS enhanced disclosure before the placement can commence. These enhanced disclosures should not pre-date the course application date.
- 7.9 Individuals undertaking work shadowing of Careers Wales employees must always be supervised and not have one to one access to children, young people, or adults even if they have a current DBS check.
- 7.10 Careers Wales does not subcontract any of its remitted work with customers to third party providers.
- 7.11 Quality assurance and evaluation providers may in some instances be required to demonstrate that they have safeguarding processes in place if they are undertaking any unsupervised work with individuals (e.g. focus groups). Other contracted work is unlikely to include unsupervised work with individuals.

### **Use of Photographs and Digital Images of Children, Young People and Adults at Risk.**

- 7.12 Careers Wales has in place procedures on the use of photographs and images of young people to avoid their misuse on websites and in other publications. Careers Wales employees and anyone acting on behalf of Careers Wales in this context must conform with these procedures.



## 8. POLICY REVIEW.

- 8.1 This policy will be reviewed by Careers Wales annually or more frequently following the introduction of new legislation or guidance from Welsh Government. This responsibility sits with the Director of Customer Strategy and Service Development in consultation with relevant Heads of Delivery.



## **Appendix 1:**

### **Vulnerability due to extreme points of view.**

Careers Wales acknowledges its duty to protect individuals from any form of extreme points of view or ideology which may lead to the harming of self or others. The definition of extreme points of view is 'a set of ideas which could justify vilification or violence against individuals, groups or self'.

Vulnerability is being capable of being injured, difficult to defend, open to moral or ideological attack.

The Prevent strategy is part of the UK's counter-terrorism strategy, CONTEST. The aim is to reduce the threat to the UK from terrorism by stopping people from becoming terrorists or supporting terrorists. It includes non-violent extremism and is aimed at intervening individuals from moving into extremist groups. Employees engaged with individuals will need to know how to identify extremism, how to refer concerns and obtain support for those exposed and at risk of harm from these views.

Extremism is defined in the HM Government 2011 Prevent strategy as:

'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Non-violent extremism is as above but not accompanied by violence.



## Appendix 2: Relevant documentation.

### Careers Wales Policies and procedures:

Safeguarding Procedures

Whistle Blowing Policy

Dignity and Respect Policy

Recruitment and Selection Policy and Procedures

Disclosure and Barring Procedures:

Discipline and Grievance Policy

Code of Conduct - Standards in Public Life Policy

[PREVENT Strategy](#)

### Careers Wales forms:

Event Photography Consent Form

SVG1 Referral form

## Legislation:

- [Human Rights Act 1998](#)
- [Children's Act 1989](#)
- [Children Act 2004 \(legislation.gov.uk\)](#)
- [Mental Capacity Act 2005](#)
- [Safeguarding Vulnerable Groups Act 2006](#) (amended by the [Protection of Freedoms Act 2012](#))
- [Equality Act 2010](#)
- [Rights of Children and Young Persons \(Wales\) Measure 2011](#)
- [Counter - Terrorism and Security Act 2015](#)
- [Social Services and Well Being \(Wales\) Act 2014](#)
- [Well-Being of Future Generations \(Wales\) Act 2015](#)
- [Modern Slavery Act 2015](#)
- [Violence Against Women, Domestic Abuse and Sexual Violence Act \(Wales\) 2015](#)
- [Data Protection Act 2018](#)
- [General Data Protection Regulation \(GDPR\)](#)
- [Children \(Abolition of Defence of Reasonable Punishment\) \(Wales\) 2020](#)



## Statutory guidance:

- [Keeping learners safe \(2022\)](#)
- [Revised PREVENT duty guidance: for England and Wales \(2023\)](#)
- [Channel Duty Guidance Protecting people susceptible to radicalisation – reviewed 2023](#)
- [Working Together to Safeguard People, volume 1 – Introduction and Overview](#)
- [Working Together to Safeguard People: volume 2: Child Practice Reviews](#)
- [Working Together to Safeguard People: volume 3: Adult Practice Reviews](#)
- [Working Together to Safeguard People volume 5 – Handling Individual Cases to Protect Children at risk](#)
- [Working Together to Safeguard People volume 6 – Handling Individual Cases to Protect Adults at risk](#)
- [Working Together to Safeguard People volume 7 – Safeguarding Children at Risk of Child Sexual Exploitation](#)

## Useful guidance.

- [Wales Safeguarding Procedures](#)
- [Working Together to Safeguard People: Information sharing to safeguard children.](#)
- [Working Together to Safeguard People: Information Sharing to Safeguard Children and Adults factsheet.](#)
- [Live-streaming and video-conferencing: safeguarding principles and practice](#)
- [DBS guidance leaflets - GOV.UK](#)

This policy was re-drafted by the Director of Customer Strategy and Service Development in 2023. In reviewing this policy, the following were consulted and provided input and feedback.

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