

# SAFEGUARDING POLICY

CWMC Nominated Safeguarding Person (NSP) will always be [The Lead Chaplain](#)

The current Lead Chaplain is **Fiona Stewart-Darling**

**Tel: 020 7477 1073 / 07739 461090**

**E: [fiona@canarywharfchaplaincy.co.uk](mailto:fiona@canarywharfchaplaincy.co.uk)**

If you have safeguarding concerns, contact the NSP now

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## CANARY WHARF MULTIFAITH CHAPLAINCY VALUES

### Section 1: Introduction

Every child or adult at risk deserves to be safe and secure in their life and activities. Their parents or carers (if they have them) need to feel sure that the people in charge of these activities, and those who exert influence over them, are trustworthy, responsible and will do everything they can to keep the adult at risk or child safe from harm.

The majority of those working on the Canary Wharf estate will be adults, although we are aware that some of the retail workers will be under 18 years old. It is unlikely that any member of the chaplaincy team will be working directly with children in the course of their work on the estate. The chaplains offer pastoral care in terms of a confidential listening ear, these will normally take place in a public place, such as a walk or coffee shop. More recently in recognising that employees can now also work from home, chaplains in addition offer conversations via virtual means or phone. Canary Wharf Multifaith Chaplaincy (CWMC) has put in place safeguards to protect children, young people or adults at risk. CWMC has also put in place safeguards to avoid putting their workers in positions where abuse might be alleged, and to ensure that all workers know exactly what to do should abuse be suspected. The Lead Chaplain (NSP) will ensure that all new staff and volunteers have read this and associated policies before undertaking any CWMC duties. CWMC believes it is important to not only protect the vulnerable from abuse but to actively promote the welfare of children, young people and adults at risk - not just to protect, but to safeguard. The Canary Wharf estate is a private estate with its own security team, there may be occasions when it's appropriate to refer a concern to the Security Duty Manager (Appendix A).

The definition of adult at risk is defined in the Care Act 2014 who may be in need of community care services by reason of mental or other disability, age or illness; and who is unable to protect him or herself against significant harm or exploitation. For the purposes of this policy, this category can be extended to those in temporary emotional distress, which in many cases can render an individual susceptible to manipulation or exploitation. The legal definition of a child is someone under the age of 18 according to Working Together to Safeguard Children Act 2018.

### Section 2: CWMC Values for Safeguarding Adults at Risk

- **Privacy:** The right of individuals to be left alone or undisturbed and free from intrusion or public attention into their affairs.
- **Dignity:** Recognition of the intrinsic value of people regardless of circumstances by respecting their uniqueness and their personal needs and by treating them with respect.
- **Independence:** Opportunities to act and think without reference to another person, including a willingness to incur a degree of calculated risk.
- **Choice:** Opportunity to select independently from a range of options.
- **Rights:** The maintenance of all entitlements associated with citizenship.
- **Fulfilment:** The realisation of personal aspirations and abilities in all aspects of daily life.
- **Valuing Diversity:** Respect for different cultures, ethnic backgrounds, disabilities, religions, ages, genders, and sexual preferences.
- **Use of professional** safeguarding advice and support both inside and outside the chaplaincy

### Section 3: CWMC Values for Safeguarding Children & Young People

- The needs of the child are paramount and should underpin all child protection work.
- All children and young people have the right to grow up in a caring and safe environment.
- Children and young people have the right to be protected from abuse of all types, and to expect that adults in positions of responsibility will do everything possible to foster those rights.

## CWMC SAFEGUARDING PROCEDURES

### Section 4: CWMC Contact with Children, Young People & Adults at Risk

CWMC employees and volunteers may work with children, young people and adults at risk directly and indirectly through their chaplaincy work to various retail outlets, businesses and residences. Chaplains may build strong relationships on the basis of providing a listening ear. Meetings should always be in public, in the workplace or a public meeting area. CWMC chaplains are not counsellors and there should be no need to meet in private. Chaplains should not offer any form of meeting or relationship outside the context of Workplace Chaplaincy to children, young people or adults at risk. Where unsolicited contact is made with a chaplain by an individual outside this context, this should be immediately discussed with a line manager. Where exceptions to these guidelines are unavoidable and privacy is required, the chaplain should, nonetheless be aware of possible dangers and act appropriately. Such exceptional circumstances should be discussed with the chaplain's line manager at the earliest opportunity. This can be done, in generality, without compromising confidentiality and is a safeguard to all concerned.

### Section 5: Preventing Opportunities for Abuse

CWMC aims to:

- Ensure the practice of safe recruitment by checking the suitability of staff and volunteers to work in the environment they are appointed to.
- Make our Safeguarding Policy widely available.
- Ensure that the CWMC Nominated Safeguarding Person (NSP) is known and available to all staff and volunteers.
- CWMC Nominated Safeguarding Person (NSP) is the Lead Chaplain

#### 5.1 Safer Recruitment and Supervision of Staff/Volunteers

The CWMC will ensure all members of the team will be appointed, trained, supported and supervised in accordance with government guidance on safe recruitment. This includes ensuring that:

- There is a written job description / person specification for the post
- Those applying have completed an application form and a self-declaration form
- Those short listed have been interviewed
- Safeguarding has been discussed at interview
- Written references have been obtained, and followed up where appropriate
- A disclosure and barring check has been completed where necessary (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information)

- Qualifications where relevant have been verified
- A suitable training programme is provided for the successful applicant
- The applicant has completed a probationary period of 6 months
- The applicant has been given a copy of the organisation's safeguarding policy and knows how to report concerns.

In addition, it is important for volunteers to be accountable like paid members of the team. Therefore, each volunteer will be asked to sign a Service Level Agreement and example of which is in Appendix B.

## 5.2 Training & Development

All CWMC team members will receive induction safeguarding training and undertake recognised training on a regular basis.

## 5.3 Safer Practice in Direct Work

- No CWMC member of staff or volunteer will be alone with a child or adult at risk without alerting others to the reason.
- All allegations of abuse against a worker, however minor, are reported to the CWMC member of staff or volunteer's line manager.
- The CWMC has the following additional policies in place:
  - Health & Safety (particularly regarding one to one pastoral conversations)
  - Confidentiality
  - Accountability
  - Data Protection
  - Social Media
  - Working from home
- Soft copies all policies can be accessed by all team CWMC members through the Microsoft Teams General Folder, and hard copies are kept in a folder in the Chaplains' office.

## 5.4 Safer Practice for Staff who may come into contact with Children and Adults at Risk but do not directly work with them

- This is the most likely occurrence within CWMC's area of work. All staff will have a Standard CRB check.
- Where practical, no CWMC member of staff or volunteer will be alone with a child or adults at risk without alerting others to the reason.

## 6. Responding to allegations of abuse

Under no circumstances should any member of the chaplaincy team including volunteers carry out their own investigation into an allegation or suspicion of abuse. Follow procedures below:

- Documenting a concern

The CWMC team member including volunteers should make a report of the concern in the following way:

- The person in receipt of allegations or suspicions of abuse should report concerns as soon as possible to:

**Revd Dr Fiona Stewart-Darling** (here after the Nominated Safeguarding Person (NSP))

**Tel: 020 7477 1073/07739 461090**

**Email: [fiona@canarywharfchaplaincy.co.uk](mailto:fiona@canarywharfchaplaincy.co.uk)**

- The Nominated Safeguarding Person should first call **Thirtyone:Eight** and seek advice.  
**Thirtyone:eight** PO box 133, Swanley, Kent, BR8 7UQ  
Tel: 0303 003 1111
- In the absence of the Nominated Safeguarding Person (NSP) or if suspicions involve the NSP, then advice should be sought and a report should be made in the first instance to:

**Thirtyone:eight** PO box 133, Swanley, Kent, BR8 7UQ  
Tel: 0303 003 1111

A summary of reporting procedures:

See Appendix D – Flowchart for Action: Adults at Risk.

See Appendix E – Flowchart for Action: Children and Young People

## 6. Confidentiality

- All information about any individual adult at risk or any individual volunteer or member of the chaplaincy team should be treated as confidential and will not be communicated to others, except those who need to be involved for due process to take place.
- Any concerns should be discussed with the NSP.

## 7. Legislation

### Care Act 2014

The Care Act 2014 came into effect in April 2015 has replaced most previous laws regarding carers and people being cared for. It outlines the way in which local authorities should carry out carer's assessments and needs assessments; how local authorities should determine who is eligible for support; how local authorities should charge for both residential care and community care; and places new obligations on local authorities.

The Care Act is mainly for adults in need of care and support, and their adult carers. There are some provisions for the transition of children in need of care and support, parent carers of children in need of care and support, and young carers. However, the main provisions for these groups (before transition) are in the Children and Families Act 2014

### Working Together to Safeguard Children 2018

Working Together to Safeguard Children 2018 replaces both the Children Act 2004 and the Social Work Act 2017. It strengthens this already important relationship by placing new duties on key agencies in a local area. Specifically, the police, clinical commissioning groups and the local authority are under a duty to make arrangements to work together, and with other partners locally, to safeguard and promote the welfare of all children in their area.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: a child is defined as anyone who has not yet reached their 18th birthday.

### **Human Rights and the Law**

We recognise the personal dignity and rights of all children, young people and adults, as enshrined in the Human Rights Act 1998 and the 1989 United Nations Convention on the Rights of the Child. Safeguarding work is undertaken within a legislative framework supported by government guidance which sets out a range of safeguarding duties, responsibilities and best practice to which we will adhere.

## **9. ADOPTION OF THE POLICY**

This policy was agreed by the Leadership and will be reviewed annually.

Signed by: Position: Chair of the CWMC Ltd Board

Signed by: Position: CWMC Lead Chaplain

Date:

Version 003

Revised September 2020

## **APPENDICES**

### **Appendix A: Working with Canary Wharf Security Team**

The Canary Wharf Security Team will usually be the first responders to an incident with an adult or child of young person of concern if they are in any of the public places on the Canary Wharf estate, e.g. Retail Malls, Office building lobbies and all external locations. Increasingly members of the security team are trained a Mental Health First Aiders. On occasion a chaplain maybe working with the security team dealing

with a situation where an adult, child or young person is at risk, in these instances the security team member will be in consultation with their manager and will take the lead in taking appropriate action.

## Appendix B: Example of a Service Level Agreement for Volunteers

### 1. Introduction

The purpose of this Service Level Agreement (SLA) is to define the pastoral care and support services provided by X, whose principal place of business is X, to the Lead Chaplain in Canary Wharf Multifaith Chaplaincy whose principal place of business is One Canada Square, London E14 5AB.

The services outlined in this SLA will be undertaken in the retail malls and other retail outlets on the Canary Wharf Estate, London.

Retail Chaplaincy offers a structured visiting programme to people working in shops, cafes, restaurants etc. Chaplains are present as a sign of God's involvement in the world and their task is to respond appropriately to anyone they meet. By building bridges of trust chaplains are able to offer pastoral care and support to staff as well occasionally help them to consider the values they work with, both formally and informally.

X will use all reasonable care, skill and diligence in providing all pastoral care and support services to the working retail community at Canary Wharf in a professional and ethical manner and in accordance with best practices and standards. In providing the services and performing its obligations X will comply with all applicable regulations, laws and legislation and adhere to the code of conduct and working practices as set out in the Chaplaincy Handbook.

### 2. Service Schedule

The following sections of the Service Schedule will be reviewed after a period of 6 months to ascertain if this programme is performing well and meeting the required objectives. If this has been achieved a renewal for a further 6 month period will be considered.

The retail chaplain will provide pastoral care and support in Canary Wharf for one session a week (on average) between 09.30 -12.00 & or 14.30 – 16.30 Monday to Friday or the times which are most appropriate for the retail workers.

#### 2.1 Pastoral care and support services

2.1.1 To visit shops, cafes and restaurants on the Canary Wharf Estate offering pastoral care and support as required.

2.1.2 To keep a log of visits.

X will keep documentation in the form of X which will be stored securely in X

### 3. Principal Contacts

Chaplains office: T: 020 7477 1073

Revd Dr Fiona Stewart-Darling: Lead Retail Chaplain M: 07739 461090

E: [fiona@canarywharfchaplaincy.co.uk](mailto:fiona@canarywharfchaplaincy.co.uk)

Revd Barbara Hume: Lead Retail Chaplain [barbara@canarywharfchaplaincy.co.uk](mailto:barbara@canarywharfchaplaincy.co.uk)

### 4. Service Levels and Standards

#### 4.1 Service Delivery

The services delivered by X will be in the best interests of Canary Wharf Group (CWG) X will:

- Ensure the service is provided only by staff who have the appropriate knowledge, skills, qualifications, experience and training.
- Ensure adequate equipment and support (e.g., clerical) is available for the services to be provided.
- X will respect and honour the boundaries of confidentiality.

#### **4.2 Equipment**

Stationery will be provided by X

Access to Chaplaincy Meeting Room in Churchill Place Mall in Canary Wharf

#### **4.3 Internal Standards**

X will:

- Maintain the highest levels of pastoral care and support and administrative standards.
- Provide education and training where necessary to other volunteers to ensure contemporary knowledge and skills.
- As a Chaplain, X must be committed to his Faith and regularly attend his local place of worship
- As a Chaplain, X may be lay or ordained/accredited and come from a recognised tradition of their faith communities
- X will receive induction safeguarding training and undertake recognised training on a regular basis.

#### **4.4 Records**

X will ensure:

- Adequate, factual, contemporaneous and legible records are maintained confidentially.
- All records are to be stored safely and securely.
- Information is protected from improper and accidental disclosure.
- Information is only released in line with the guidance from the code of conduct and working practices as set out in the Chaplaincy Handbook.
- Compliance with all relevant legislation e.g. the Data Protection Act 2018 and GDPR 2018.

#### **5. Review Meetings and Discussions**

Regular review meetings will take place at least quarterly with Revd Barbara Hume and X to discuss the ongoing operational running of the service from both sides.

#### **6. Data Protection and GDPR**

X confirms that it shall comply with The Data Protection Act 2018 and GDPR 2018 and any other applicable data protection or privacy laws or regulations, including laws and regulations governing the use and disclosure of records and personal data.

#### **7. Confidentiality**

During the term of this SLA and after termination or expiration for any reason, X will not use confidential information for a purpose other than the performance of its obligations under this SLA.

#### **8. Complaints Procedure**

X and the Revd Barbara Hume are committed to providing a professional and effective service. However, in the event that we fail to meet expectations, there is a comprehensive Complaints Guide available to all clients, which outlines each stage of the complaint procedure for response and resolution.

The Complaints Procedure outlines the formal procedure for handling and investigating complaints about all aspects of service and care provided by X. This ensures that a client's complaint has a fair hearing and results in remedial action being taken appropriate. See the Retail Chaplains Handbook.

#### **9. Expenses**

Reasonable expenses are payable by the Chaplaincy Company

Canary Wharf Multifaith Chaplaincy Ltd. Numeration to be agreed by speaking with the Lead Retail Chaplain.

**10. Notice of Termination of Contract**

This agreement may be terminated by either party by giving 3 months’ notice in writing.

This is then signed by the Lead Chaplain and then new volunteer.

**Appendix C: Definitions of Types of Abuse**

**i. Physical Abuse of Children, Young People or Adults at Risk**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or adult at risk.

Physical harm may also be caused when a parent/carer fabricates the symptoms of, or deliberately induces, illness in a child or adult at risk.

Physical Abuse - Indicators	
Physical Indicators	Behavioural Indicators
<ul style="list-style-type: none"> <li>▪ Unexplained injuries – bruises / abrasions / lacerations</li> <li>▪ The account of the accident may be vague or may vary in repeated accounts</li> <li>▪ Unexplained burns</li> <li>▪ Regular occurrence of unexplained injuries</li> </ul> <p>Most accidental injuries occur on parts of the body where the skin passes over a bony protrusion.</p>	<ul style="list-style-type: none"> <li>▪ Withdrawn or aggressive behavioural extremes</li> <li>▪ Uncomfortable with physical contact</li> <li>▪ Seems afraid to go home</li> <li>▪ Complains of soreness or moves uncomfortably</li> <li>▪ Wears clothing inappropriate for the weather, in order to cover body</li> <li>▪ The interaction between the child, vulnerable adult and its carer</li> </ul>

**ii. Neglect**

Neglect is the persistent failure to meet a child’s or adult at risk basic physical and/or psychological needs, likely to result in the serious impairment of the child’s or adult at risk health or development.

Neglect may involve a parent/carer failing to:

- Provide adequate food, clothing and shelter
- Protect a child or adult at risk from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child’s or adult at risk basic emotional needs.

Neglect - Indicators	
Physical Indicators	Behavioural Indicators
<ul style="list-style-type: none"> <li>▪ Unattended medical need</li> <li>▪ Underweight or obesity</li> </ul>	<ul style="list-style-type: none"> <li>▪ Poor social relationships</li> <li>▪ Indiscriminate friendliness</li> </ul>

<ul style="list-style-type: none"> <li>▪ Recurrent infection</li> <li>▪ Unkempt dirty appearance</li> <li>▪ Smelly</li> <li>▪ Inadequate / unwashed clothes</li> <li>▪ Consistent lack of supervision</li> <li>▪ Consistent hunger</li> <li>▪ Inappropriately dressed</li> </ul>	<ul style="list-style-type: none"> <li>▪ Poor concentration</li> <li>▪ Low self-esteem</li> <li>▪ Regularly displays fatigue or lethargic</li> <li>▪ Frequently falls asleep</li> <li>▪ Frequent unexplained absences</li> </ul>
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iii. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent effects on the child’s or adult at risk emotional development, and may involve:

- Conveying to children or adult at risk that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child’s or adult at risk developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child or adult at risk participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying, causing children or adults at risk frequently to feel frightened or in danger, or the exploitation or corruption of children or adults at risk

Emotional Abuse - Indicators	
Physical Indicators	Behavioural Indicators
<ul style="list-style-type: none"> <li>▪ Poor attachment relationship</li> <li>▪ Unresponsive/neglectful behaviour towards the child’s or vulnerable adult’s emotional needs</li> <li>▪ Persistent negative comments about the child or vulnerable adult</li> <li>▪ Inappropriate or inconsistent expectations</li> <li>▪ Self-harm</li> </ul>	<ul style="list-style-type: none"> <li>▪ Low self-esteem</li> <li>▪ Unhappiness, anxiety</li> <li>▪ Withdrawn, insecure</li> <li>▪ Attention seeking</li> <li>▪ Passive or aggressive behavioural extremes</li> </ul>

iv. Sexual Abuse

Sexual abuse involves forcing or enticing a child, young person or adult at risk to take part in sexual activities, including prostitution, whether or not the child or adult at risk is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts.

Sexual abuse includes non-contact activities, such as involving children or adults at risk in looking at, or in the production of pornographic materials, watching sexual activities or encouraging children or adults at risk to behave in sexually inappropriate ways.

Sexual Abuse - Indicators	
Physical Indicators	Behavioural Indicators
<p>8. Sign of blood / discharge on the child’s or vulnerable adult’s underclothing</p> <p>9. Awkwardness in walking / sitting</p>	<ul style="list-style-type: none"> <li>▪ Sexually proactive behaviour or knowledge that is incompatible with a child’s age &amp; understanding</li> </ul>

<ul style="list-style-type: none"> <li>10. Pain or itching – genital area</li> <li>11. Bruising, scratching, bites on the inner thighs / external genitalia</li> <li>12. Self-harm</li> <li>13. Eating disorders</li> <li>14. Enuresis / encopresis</li> <li>15. Sudden weight loss or gain</li> </ul>	<ul style="list-style-type: none"> <li>▪ Drawings &amp; or written work that is sexually explicit</li> <li>▪ Self-harm / Suicide attempts</li> <li>▪ Running away</li> <li>▪ Substance abuse</li> <li>▪ Significant devaluing of self</li> <li>▪ Loss of concentration</li> </ul>
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### 5. Discriminatory forms of Abuse

This form of abuse involves direct or indirect discrimination of children or adults at risk because of their race, gender, sexuality, disability, religion, mental health status or age.

#### Discriminatory Abuse – Examples:

- Lack of culturally or gender sensitivity in care practices
- Access to services denied due to lack of disability awareness and access needs of members
- No attempt to address language barriers
- No provision of culturally sensitive food
- No awareness of importance of faith festivals etc.

### 6. Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology

### 7. Extremism

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

### 8. Financial or material abuse

- Disparity between assets and living conditions
- Unexplained withdrawals from accounts or disappearance of financial documents or loss of money
- Sudden inability to pay bills, getting into debt
- Carers or professionals fail to account for expenses incurred on a person’s behalf
- Recent changes of deeds or title to property
- Missing personal belongings
- Inappropriate granting and / or use of Power of Attorney

### 9. Modern slavery

- Physical appearance; unkempt, inappropriate clothing, malnourished
- Movement monitored, rarely alone, travel early or late at night to facilitate working hours.
- Few personal possessions or ID documents.
- Fear of seeking help or trusting people.

### 10. Institutional Abuse

Low self-esteem

Withdrawn

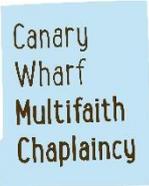
Anger

Person puts themselves down in terms of their gender or sexuality

Abuse may be observed in conversations or reports by the person of how they perceive themselves

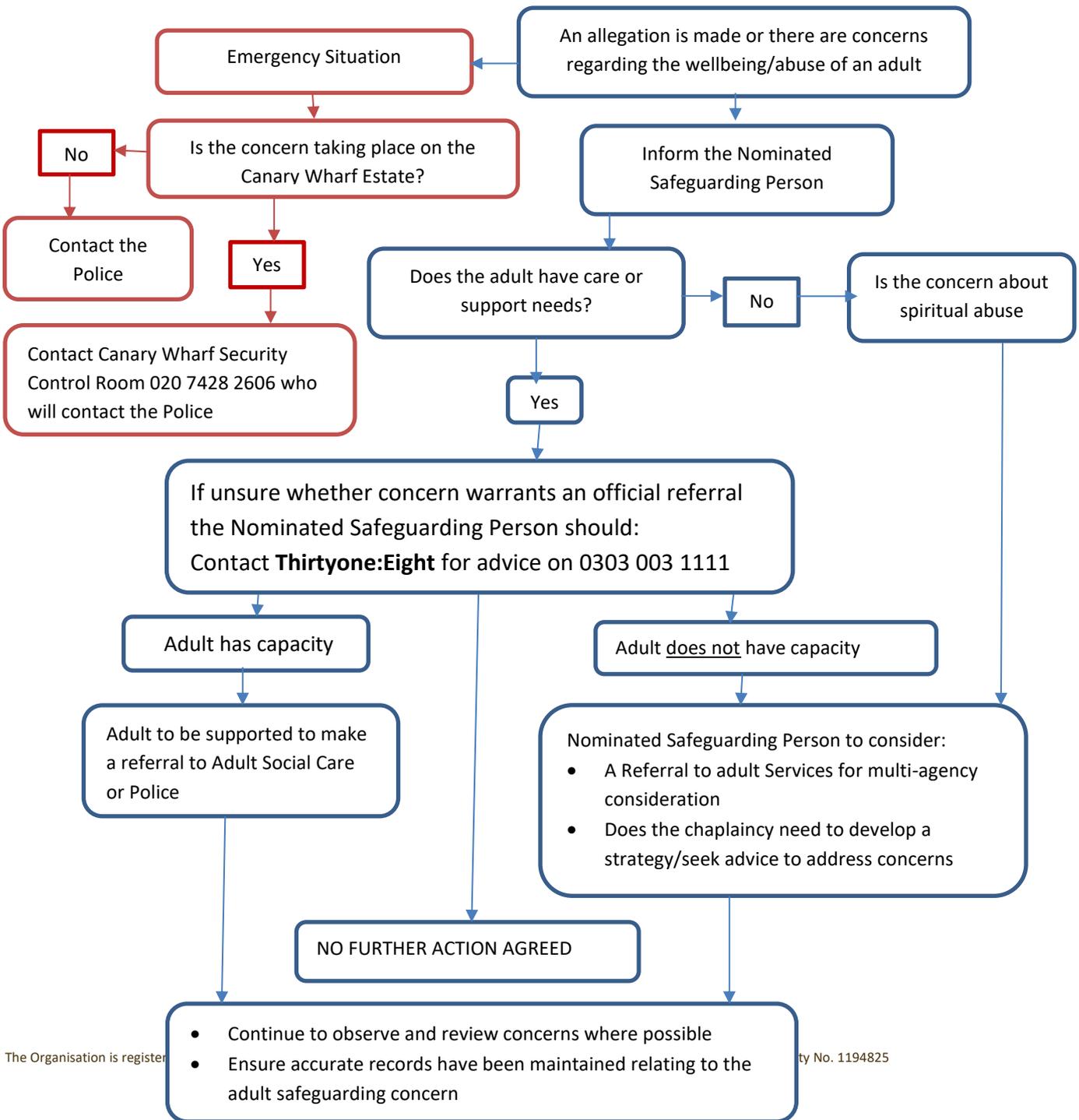
No confidence in complaints procedures for staff or service users.

Neglectful or poor professional practice.



## Flowchart for Action: Adults at Risk

Gives an overview of actions to be taken but needs to be used on conjunction with written procedures.



## Flowchart for Action: Children and Young People at Risk

Gives an overview of actions to be taken but needs to be used on conjunction with written procedures.

