



TREASURE
KEEPERS

Policy Pack

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First Issue Date	11.11.2020	Previous Review Dates:	
Current Review Date	26.07.2021		

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TREASURE KEEPERS

CHILD & ADULT SAFEGUARDING AND PROTECTION POLICY

Safeguarding and protecting children and Adults is of the highest priority for Treasure Keepers.

Any concerns around risk, crisis management or critical incidences for Children or Adults should be managed in line with the guidance within this policy.

Treasure Keepers Service Users are safeguarded from all forms of abuse, exploitation and discrimination, whether deliberate or inadvertent, in accordance with written policies and procedures.

This policy is also applicable to Children or Adults who are not Treasure Keepers Service Users, but with whom Treasure Keepers comes into contact.

Safeguarding also means being proactive about promoting and maintaining a child's well-being. Aiming to avoiding situations where children could be at risk of developing not well or become at risk of harm.

Designated Safeguarding Lead (and Service Manager)

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Introduction

The following safeguarding policy and child protection procedures are in line with the 'SET Safeguarding and Child Protection Procedures'.

From May 2019 Southend, Essex and Thurrock LSCB's merged to form SET Safeguarding and Child Protection Procedures.

The legal framework and associated guidance that informs and underpins the Treasure Keepers policy and procedures on child protection and safeguarding is as follows:

- The Children Act 1989
- The United Nations Convention on the Rights of the Child (ratified by UK Gov.1991)
- The Protection of Children Act 1999
- The Sexual Offences Act 2003
- The Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Adoption Agencies Regulations 2005 amended 2013.
- Anti-Social Behaviour, Crime and Policing Act 2014
- The Children and Families Act 2014
- Serious Crime Act 2015
- Counter-Terrorism and Security Act 2015
- Children and Social Work Act 2017
- Domestic Violence Act 2021

The most important government guidance documents are in the following:

- The Framework for Assessment of Children in Need 2000
- Safeguarding Children from Abuse Linked to a Belief in Spirit Possession (2007) The Common Assessment Framework (CAF)
- Tackling Child Sexual Exploitation Action Plan, (DfE 2011)
- National action plan to tackle child abuse linked to faith or belief (2012)
- What to do if you're worried a child is being abused. Advice for Practitioners (March 2015)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2015)
- Keeping Children Safe in Education (July 2015)
- Revised Prevent Duty Guidance: for England and Wales Guidance for specified Authorities in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism (July 2015)
- The Prevent Duty Departmental Advice for Schools and Child Care Providers June 2015
- Working Together to Safeguard Children Guidance (March 2018)
- The SET Standard Operating Procedures for Information Sharing in respect of Child Sexual Exploitation (Jan 2018)
- The SET Safeguarding and Child Protection Procedures (May 2019)
- SET Prevent Policy and Guidance (2019)
- National Minimum Standards relating to Adoption.
- National Minimum Standards Fostering Services.
- Disclosure and Barring Service guidelines 2018

Linked Treasure Keepers Policies

- Conduct Management
- Compliments and Complaints
- Confidentiality
- Covid-19
- Data Protection and Privacy
- Drug and Alcohol
- Health and Safety
- Internet and Computer Use
- Missing, Absent or Away without Notification
- Out of Hours
- Quality Assurance
- Safer Recruitment
- Significant Incident and Notifiable Events
- Supervision
- Whistleblowing
- Visitors

Key Principles:

- Safeguarding is everyone's responsibility.
- For services to be effective each professional and organisation should play their full part
- A child-centred approach should be adopted: for services to be effective they should be based on a clear understanding of the needs and views of children

Working Together (March 2018)

The Working Together Document (2018) stresses that no single professional can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

In addition, it emphasises that every professional should, in particular, be alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs;
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
- has returned home to their family from care; and/or
- is showing early signs of abuse and/or neglect

Our Duty to ensure safeguarding of children:

Everyone at Treasure Keepers has a duty to ensure they understand the following Child Protection Policy and Procedures.

Safeguarding and promoting the welfare of children depends upon the effective joint working with any Local Authority/Police who are making child protection enquiries in respect of the child(ren).

It is essential therefore that Treasure Keepers Associates see this as a shared responsibility and liaise and co-operate with any Local Authority which is making such enquiries so that an assessment can be made of the child's needs and circumstances.

Duty of the Designated Safeguarding Lead

Treasure Keepers Designated Safeguarding lead is Jo Groom (Service Manager)

It is the responsibility of Treasure Keepers Designated Safeguarding Lead to:

- Create an environment that is conducive to the safeguarding of children
- Implement the Treasure Keepers Child Protection Policy and Procedures
- Ensure that procedures are regularly kept up to date, including:
 - having regular meetings with the Clinical & Service Director to review the policy and procedures as well as individual cases or any other concerns.
 - an annual formal review of Treasure Keepers Safeguarding and Promoting Welfare Procedures
- Ensure the development and implementation of safe recruitment practices that comply with the Protection of Children Act 1999 and the Safeguarding Vulnerable Groups Act 2006. As part of this process Treasure Keepers will ensure that all qualifications and enhanced DBS checks are up to date and references are checked as well as other checks as appropriate.
- Ensure that all Associates receive regular training to enable them to apply the policy and procedures to safeguard children.
- Associates will be trained on the Treasure Keepers Safeguarding Children Policy and Procedures, and also attend refresher training as required with the Designated Safeguarding Lead.
- Additional supplementary or specialist Child Protection training in addition to any training with the Designated Safeguarding Lead.
- The Designated Safeguard Lead will remain overall accountable and responsible for Treasure Keepers work in respect of safeguarding children and meeting the requirements of the law and this policy.

Duty of Employees & Associates

- Employees & Associates should follow the Treasure Keepers Child Protection Policy and Procedures.
- Employees & Associates should be alert to the presence or risk of 'significant harm' to children and should discuss any child protection concerns immediately with the Designated Safeguard Lead.

- Employees & Associates should also report the disclosure of any historical abuse.
- Employees & Associates should seek the advice of the Designated Safeguard Lead if there is uncertainty as to how to proceed.
- Employees & Associates should inform the Designated Safeguard Lead where there are either new, or significant developments regarding child protection concerns. The Designated Safeguard Lead will decide if the concern falls within the remit of Treasure Keepers Child Protection Policy.
- The Clinical & Service Director should be spoken to about any concerns in the absence of the Designated Safeguard Lead/Manager.

CHILD PROTECTION PROCEDURES

The following procedures prescribe the actions to be taken in the event of concerns about safeguarding children:

Consideration of ‘Significant Harm’

All Associates should be mindful of the signs and symptoms of ‘significant harm’ in all their cases. This should be an integral part of their role throughout the period of contact with a family.

Types of abuse and neglect

- ‘Child abuse and neglect’ is a generic term encompassing all ill treatment of children including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the child’s health or development.
- Children may be abused or neglected through the infliction of harm, or through the failure to act to prevent harm.
- Abuse can occur in a family or an institutional or community setting and the perpetrator may or may not be known to the child.
- Working Together to Safeguard Children sets out definitions and examples of the four broad categories of abuse which are used for the purposes of registration:
 - Neglect
 - Physical abuse
 - Sexual abuse and
 - Emotional abuse (including domestic violence)

These categories overlap and an abused child does frequently suffer more than one type of abuse.

Physical Abuse

- Physical abuse may take many forms e.g. hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating and bullying.
- It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness in a child.

- It should be noted that a bruise on a baby who cannot yet crawl or walk is very unusual and can be a serious cause for concern (it may be due to an underlying health condition, blood disease or an infection) but this should be immediately discussed with the Designated Safeguard Lead and referral considered to the appropriate local authority safeguarding service.

Emotional Abuse

- Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent effects on the child's emotional development, and may involve:
- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Imposing developmentally inappropriate expectations
- Causing children to feel frightened or in danger
- Domestic violence - the evidence of a child(ren) witnessing or being caught in the crossfire of domestic violence
- Exploitation or corruption of children
- Bullying or intimidation – It involves the abuse and/or intimidation by a person, people or an organisation against another or others. Children may bully other children.

Some level of emotional abuse is involved in most types of ill treatment of children, though emotional abuse may occur alone.

Sexual Abuse

- Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening and includes penetrative (i.e. vaginal or anal rape or buggery) and non-penetrative acts.
- It may also include non-contact activities, such as involving children in looking at, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexual inappropriate ways.
- Sexual abuse also includes sexual exploitation – children or young people being sexually exploited in the community and female genital mutilation.
- Female Genital Mutilation is both sexual and physical abuse to a female.

Neglect

- Neglect involves the persistent failure to meet a child's basic physical, medical and/or psychological needs, likely to result in the serious impairment of the child's health and development
- Neglect may involve failure to provide adequate food, shelter or clothing, failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also include neglect of a child's basic emotional needs.
- Neglect may include children not attending or missing from school.

Domestic Abuse/Violence

- Domestic Abuse/violence is now defined in Domestic Abuse Act 2021 and the Home Office as: 'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or

abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.

- This can encompass psychological, physical, sexual, emotional and financial abuse.
- Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
- Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.
- The Government definition includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and victims are not confined to one gender or ethnic group.
- It has been widely understood for some time that coercive control is a core part of domestic violence. It is important to recognise coercive control as a complex pattern of overlapping and repeated abuse, perpetrated within a context of power and control. The main characteristic of domestic violence is that the behaviour is intentional and is calculated to exercise power and control within a relationship.
- Children of all ages living with a parent, most often the mother, who is experiencing domestic violence, are vulnerable to significant harm through physical, sexual, emotional abuse and / or neglect. The legal definition of significant harm includes "the harm that children suffer by seeing or hearing the ill-treatment of another, particularly in the home".
- Situations of domestic violence may also include women or girls who perpetrate violence against men and boys, within same sex relationships and from a child. Professionals should be aware of the possibility that teenage girls or boys could be experiencing violence within an intimate partner relationship.
- For supplementary guidance please refer to the SET Safeguarding and Child Protection Procedures (May 2019) for Domestic Abuse
- <http://www.escb.co.uk/media/2016/set-procedures-may-2019-final.pdf>
- <http://www.escb.co.uk/working-with-children/domestic-abuse/>

Safeguarding Disabled Children

- Any child with a disability is by definition a 'child in need' under Section 17 of the Children Act 1989. Disabled children are more vulnerable to significant harm through physical, sexual, emotional abuse and / or neglect than children who do not have a disability. The presence of multiple disabilities increases the risk of abuse and neglect.
- Safeguards for disabled children are essentially the same as for non-disabled children. Particular attention should be paid to promoting a high level of awareness of the risks of harm, high standards of practice, and awareness of barriers to communication that may make it difficult for the child or young person to tell others what is happening.
- Where there are concerns about the welfare of a disabled child, they should be acted upon in accordance with the guidance, in the same way as with any other child.
- The national guidance, Safeguarding Disabled Children – Practice Guidance, provides a framework of collaborative multi-agency responses to safeguard disabled children:

<https://www.education.gov.uk/publications/eOrderingDownload/00374-2009DOM-EN.pdf>

Children and Young people vulnerable to Child Sexual Exploitation

- Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.
- Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain.
- In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Source: Tackling Child Sexual Exploitation Action Plan, DfE 2011

There are six key points to emphasise in this definition which will affect the understanding of CSE:

- CSE as a form of abuse can apply to all children and young people, not just those under the age of consent – children aged 16 or 17 can still be sexually exploited, and children from any ethnic or religious background can be victims;
- CSE can occur in a wide range of relationships, contexts and exploitative situations, including bullying;
- There is typically a power imbalance between perpetrator and victim;
- The victim commonly has limited choice – resulting from their various vulnerabilities – though may not recognise the limitations of their ability to choose;
- Increasingly, the use of technology (particularly mobile phones and social networking) is involved in incidences of CSE.
- A victim cannot consent to their abuse: children are not responsible for being sexually exploited.

There are many characteristic warning signs that a child may be being sexually exploited. These include, but are not limited to:

- Going missing for periods of time or regularly coming home late
- Regularly missing school or education or not taking part in education
- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older 'boyfriends' or 'girlfriends'
- Suffering from sexually transmitted infections
- Mood swings or changes in emotional wellbeing
- Drug and alcohol misuse; and
- Displaying inappropriate sexualised behaviour

If there is suspicion or disclosure of child sexual exploitation this matter should in the first instance be discussed with the Clinical & Service Director or equivalent and then to make a referral to the appropriate

Local Authority safeguarding service so that they determine what further enquires and action needs to occur both immediately and longer term.

Children missing from school

- A minimum standard of safety should be afforded to children not attending school. This includes children who are: registered with schools and go missing from school, children who have poor attendance, children who are not registered with a school and children educated at home where there are concerns about their welfare.
- When a child is absent or missing from school, they could be at risk of significant harm.
- The child/ young person may be absent or missing because they are suffering physical, sexual or emotional abuse and/or neglect. It might mean the child/young person is being sexually exploited – see below under ‘Children and young people missing from care and vulnerable to sexual exploitation’
- Children who are absent or missing from school may also be missing from care or home. Treasure Keepers® Associates should consider the degree of vulnerability of the child and decide on whether any further action is required.
- For supplementary guidance please refer to the SET Safeguarding and Child Protection Procedures (May 2019) Missing children:

<http://www.escb.co.uk/media/2016/set-procedures-may-2019-final.pdf>

<http://www.escb.co.uk/working-with-children/missing-child/>

Spirit possession or witchcraft

- Spirit possession is when parents, families and the child believe that an evil force has entered a child and is controlling them; the belief includes the child being able to use the evil force to harm others. In such cases, the child might be involved in the parent’s ideation.
- A child may suffer emotional, physical and sexual abuse and neglect if they are labelled and treated as being possessed with an evil spirit. Significant harm may occur when an attempt is made to ‘exorcise’ or ‘deliver’ the evil spirit from the child, dismissing the belief may be harmful to the child involved.
- For supplementary guidance, please refer to the Government’s guidance ‘Safeguarding
- Children from Abuse Linked to a Belief in Spirit Possession:

<https://www.education.gov.uk/publications/eOrderingDownload/DFES-00465-2007.pdf>

Female genital mutilation (FGM)

- The World Health Organisation defines FGM as: “all procedures (not operations) which involve partial or total removal of the external female genitalia or injury to the female genital organs whether for cultural or other non-therapeutic reasons”
- FGM is a criminal offence in the UK. It is also illegal to take a child abroad to undergo FGM. A child for whom FGM is planned is at risk of significant harm through physical and emotional abuse.
- Where a child is thought to be at risk of FGM, practitioners need to act quickly before the child is abused through the FGM procedure in the UK or taken abroad to undergo the procedure. Any

information or concern that a child is at immediate risk of, or has undergone, FGM should result in a child protection referral following Treasure Keepers procedures

- For supplementary guidance please refer to the SET Safeguarding and Child Protection Procedures (May 2019) Safeguarding Children at Risk of Abuse through Female Genital Mutilation:

<http://www.escb.co.uk/media/2016/set-procedures-may-2019-final.pdf>

<http://www.escb.co.uk/working-with-children/female-genital-mutilation/>

Forced marriage

- Forced marriage, as distinct from a consensual arranged one, is a marriage conducted without the full consent of both parties and where duress is a factor. Duress cannot be justified on religious or cultural grounds. A child who is being forced into marriage is at risk of significant harm through physical, sexual and emotional abuse.
- Suspicions that a child may be forced into marriage include: A family history of older siblings leaving education early and marrying early; depressive behaviour including self-harming and attempted suicide; being kept at home by their parents; being unable to complete their education; a child always being accompanied including to school and doctors' appointments; a child talking about an upcoming family holiday that they are worried about; a child directly disclosing that they are worried they will be forced to marry.
- Where a suspicion or allegation of forced marriage or intended forced marriage is raised, there may be only one opportunity to speak to a potential victim and an appropriate initial response is vital. Professionals should not minimize the potential risk of harm or attempt to be a mediator.
- Professionals should see the child immediately, on their own, in a secure and private place and contact the agency's named child protection person and the police Child Abuse Investigation Team (CAIT). If the child is in immediate danger, dial 999.
- For supplementary guidance please refer to the following:

SET Safeguarding and Child Protection Procedures (May 2019) Safeguarding Children Abused Through Domestic Violence (2019):

<http://www.escb.co.uk/media/2016/set-procedures-may-2019-final.pdf>

<http://www.escb.co.uk/working-with-children/domestic-abuse/>

Forced Marriage Unit's multi-agency guidance on dealing with forced marriage

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTAGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf

Honour Based Abuse/Violence

- The Metropolitan Police definition of so-called honour-based violence is: 'a crime or incident, which has or may have been committed to protect or defend the honour of the family and/or community'. Honour based violence cuts across all cultures and communities.
- The perceived immoral behaviour which could precipitate a murder include: Inappropriate make-up or dress; the existence of a boyfriend; kissing or intimacy in a public place; rejecting a forced

marriage; pregnancy outside of marriage; being a victim of rape; inter-faith relationships; leaving a spouse or seeking divorce.

- A child who is at risk of honour-based violence is at significant risk of physical harm (including being murdered) and/or neglect and may also suffer significant emotional harm through the threat of violence or witnessing violence directed towards a sibling or other family member.
- Murders in the name of 'so-called honour' are often the culmination of a series of events over a period of time and are planned. These include: House arrest and excessive restrictions; denial of access to the telephone, internet, passport and friends; threats to kill; pressure to go abroad. There tends to be a degree of premeditation, family conspiracy and a belief that the victim deserved to die.
- When receiving a disclosure from a child, professionals should recognise the seriousness / immediacy of the risk of harm. Professionals should not minimize the potential risk of harm or attempt to be a mediator. Professionals should see the child immediately, on their own, in a secure and private place and contact the agency's named child protection person.
- If the child is at risk of honour-based violence a child protection referral should be made to the agency's named child protection person and the police Child Abuse Investigation Team (CAIT). If the child is in immediate danger, dial 999.

For supplementary guidance please refer to the SET Safeguarding and Child Protection Procedures (May 2019) Safeguarding Children Abused Through Domestic Violence (2019).

<http://www.escb.co.uk/media/2016/set-procedures-may-2019-final.pdf>

<http://www.escb.co.uk/working-with-children/domestic-abuse/>

Children and young people missing from care

- In recent years there have been a number of high-profile incidents of children and young people missing from care who are at risk or victims of sexual exploitation. A whole systems approach is required by agencies and organisations to reduce the risk of Looked After Children running away and becoming vulnerable to sexual exploitation.
- Assessing risk is a vital element in preventing and responding to sexual exploitation and running away. It is essential that Associates in Treasure Keepers have a good understanding of the individual case histories of children and young people known to it.
- The characteristics and risk factors of children and young people who go missing and who are at risk of sexual exploitation include as follows: those who have poor attachments, lack a stable home environment and may have disrupted or chaotic family backgrounds; those who have previously suffered neglect, those who have been excluded from school, those in residential care; children and young people who use drugs and alcohol, or self-harm as a reaction to previous traumatic experiences; vulnerable young people transitioning into adulthood.
- Repeat incidents of going missing even for short periods of time are strongly linked to sexual exploitation.
- Children and young people who go missing for longer periods and become detached from adult support are at increased risk of violence and sexual assault and coercion to use drugs and alcohol. It is important to be aware that going missing is not a pre-requisite for sexual exploitation.

- Sexual exploitation can occur online or by telephone and does not require physical contact. Individuals, groups or gangs can commit sexual exploitation.
- Signs of sexual exploitation include inappropriate sexual behaviour, having unexplained gifts, disengagement from education, substance misuse and behavioural and emotional disruption.
- Associates must ensure that child protection concerns are referred to the appropriate agency but not to conduct the investigation themselves.
- Associates should provide appropriate background information to the relevant Local Authority Department and/or the police so that they can determine what further enquires and/or action needs to occur.

For supplementary guidance please refer to www.rip.org.uk/prompt-missingCYP

Treasure Keepers also have a policy for [missing, absences and away without notification](#)

Radicalization

- Radicalization is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that (1) reject or undermine the status quo or (2) reject and/or undermine contemporary ideas and expressions of freedom of choice. One of the key issues for Associates is how to take account of the risks presented by extremism and radicalization as part of safeguarding children and young people.
- The process of radicalization involves a complex interplay between individual, family and community factors, including identity and belonging, alienation and boredom, passive support for far-right extremism as well as intergenerational attitudes and beliefs. Emphasis is placed on prevention.
- “In order for schools and childcare providers to fulfil the Prevent duty, it is essential that Associates are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified.
- Protecting children from the risk of radicalisation should be seen as part of schools’ and childcare providers’ wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences”.

The Prevent Duty Departmental Advice for Schools and Child Care Providers (June 2015)

- There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology.
- As with managing other safeguarding risks, Associates should be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection. Children or young people at risk of radicalisation may display different signs or seek to hide their views.
- Associates should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.
- Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour.
- The Prevent duty does not require Associates to carry out unnecessary intrusion into family life but as with any other safeguarding risk they must take action when they observe behaviour of concern.

- If a Treasure Keepers team member has a concern regarding radicalisation they should follow the agency's safeguarding procedures, discuss this with the Designated Safeguard Lead and where deemed necessary, with children's social care.

In Prevent priority areas, the local authority will have a Prevent lead that can also provide support.

Communication with the Service Manager/Risk & Crisis Management

- Where there are concerns about a child's welfare, Employees & Associates involved with the child(ren) and his/her family must discuss this immediately with the Designated Safeguard Lead/Manager.
- Associates must then complete the Cause of Concern/Safeguarding heading on the case note and share the completed case note with the Designated Safeguarding Lead, with accompanying heading 'Safeguarding Concern'.
- The Designated Safeguarding Lead completes the Cause of Concern/Safeguarding form and the attached risk assessment to determine follow up actions:
 - Whether there is a need to make a referral to the Local Authority either because the child is in need of services or because there is evidence of significant harm
 - Whether there is a need to seek the views and/or inform other professionals who also have an involvement or interest in the child(ren) and his/her family
 - Designate who will take any necessary action and within what timescale
 - Review the implications of the child protection concerns for the continuation of work with Treasure Keepers
- Treasure Keepers Director/Responsible Person is also informed.
- Treasure Keepers Director/Responsible Person is also consulted around any clinical matters related to the safeguarding concern.
- A CAF Form (Common Assessment Framework) may be required to complete a referral to Local Authority Social Care and the Associate may need to provide additional information to have this completed.
- The CAF form can be downloaded from www.education.gov.uk. It is important to consider all the children in the family who may be at risk.

The actions and discussions must be fully recorded in the following ways:

- Cause of Concern/Safeguarding Form is completed by the Designated Safeguarding Lead. This is recorded on the relevant case file and also in the Service Managers Safeguarding Folder.
- Details about the Cause of Concern/Safeguarding are recorded on the Excel Spreadsheet of the same name, to provide a quick overview of concerns within a given period.
- Case files are risk rated Red, Amber, Green indicating the level of risk/safeguarding concerns. This rating takes into account the level of potential harm and placement stability, raising practitioner awareness to safeguarding and wellbeing measures.
- The risk level on cases is regularly reviewed by the Designated Safeguarding Lead.

- In all situations, if the Designated Safeguard Lead is not available then the Clinical & Service Director will take the appropriate action as outlined.
- If the decision taken is that no further action should be taken, then the matter will rest there.
- If, however, the Designated Safeguard Lead, or whoever is acting on their behalf believes there are concerns that reach the threshold of Social Care involvement i.e. Thurrock Local authority threshold is:
 - Tier 1 Universal Services Children with no additional needs. Children who made good overall progress in all areas of universal development and receive appropriate universal services (this could result in sign posting to universal services or No further action).
 - Tier 2 Children with additional needs Children whose health and development may be adversely affected and who would benefit from extra help in order to make the best of their life chances. (referred to commonly as Early Help, CAF would be required in this instances)
 - Tier 3 Children with multiple needs Children whose health and/or development is being impaired or there is a high risk of significant impairment. (referred to commonly as Children in Need)
 - Tier 4 Children in need of protection Children who are experiencing significant harm or where there is a high likelihood of significant harm. (referred to commonly as Child Protection).

If the threshold for tier 2,3,4 is met then a referral to the relevant Children's Services within the Local Authority where the child lives should be made.

- All serious referrals (serious injury, death of a child, serious self-harm, or suicide) must be notified to OFSTED without delay and within 24 hours – see [Significant Incidents/Notifiable Events](#) policy.

Notifiable Events/Significant Incidents

- Ofsted should be informed without delay and within 24 hours of any notifiable/significant incident
- Please follow the guidance detailed in the Treasure Keepers [Significant Incidences/Notifiable Events Policy](#)
- If a notification is required please refer to the Ofsted form 'Notification form for providers of adoption support agencies' which can be found online:
- [Tell Ofsted about an incident: children's social care notification - GOV.UK \(www.gov.uk\)](#),

Child Protection Referrals to Children's Services

- Where there are concerns that a child is at significant risk of harm then a referral to the Local Authority Children's services where the child lives needs to take place.
- If there are concerns about the immediate safety or health of a child, then emergency services should be contacted on 999.
- The Local Safeguarding Board Procedures will specify if there is an agreed inter-agency referral form, this should be completed by the Designated Safeguarding Lead with information agreed by the Associate.
- If there is an allocated Social Worker for the child, they and their manager should be contacted. If there is no allocated Social Worker the Safeguarding Procedures for the relevant Local Authority should be followed.

- Child protection concerns should not wait for paperwork, the timescale for reporting should reflect the seriousness of the concern.
- If the Local Authority referral is made via telephone this must be followed up in writing within 48 hours.
- If the concern arises and is considered significant enough Out of Hours service should be contacted.
- In the light of the referral, the Local Authority will make a decision as to whether to hold a Strategy Meeting. Treasure Keepers may hold its own 'safeguarding review meeting' in more serious cases within 48 hours to discuss the case with all the relevant Treasure Keepers Associate Practitioners working with the identified family and the Designated Safeguard Lead.
- The outcomes from this meeting will be recorded and placed on the case file.
- The relevant Treasure Keepers Associate Practitioners working with the identified family and the Designated Safeguard Lead may be invited to participate at the Strategy Meeting/discussion. Their role at this meeting is to ensure that the referral information is fully understood.
- Treasure Keepers will provide a written report for any Child Protection Conference if requested in addition to the original referral form.

Involving Parents Regarding Referral to the Local Authority

- Where possible, relevant Treasure Keepers Associate Practitioners working with the identified family should seek to discuss their concerns with the parents/carers and inform them regarding the intention to make a referral to the Local Authority.
- All families prior to their engagement at Treasure Keepers are informed that this can sometimes happen.
- However, the overriding consideration is for the safety of the child or any other child/ren in the family and so there should be no undue delay in making an appropriate referral.
- There may be some exceptions to informing parents or carers of the decision to make a child a safeguarding referral, such as if it is considered likely that discussion would place the child at further risk of significant harm, risk interference with the police investigation or place the Associates member at personal risk.
- In this case Associates members should discuss their concerns with the Designated Safeguard Lead.
- All discussions and actions taken should be recorded on the Cause of Concern/Safeguarding Form and placed on the child's file as well as in the Safeguarding folder and on the tracking form.

Discussion with the Child

- If a child protection concern arises from contact with a child, the degree of discussion with the child will depend on the child's age and understanding, you should not ask the child probing questions about any disclosure, but you can clarify what you have been told.
- Listen carefully to what the child/young person tells you. Reassure them that they have done the right thing in making a disclosure and tell them they are not to blame.
- If it is considered safe to do so and if the child has age-appropriate understanding, the child should be informed of the intention to make a referral to the Local Authority.

- If the child wants to talk about what happened, the relevant Treasure Keepers Associate Practitioners working with the identified family should listen and make a note but should not encourage further disclosure.
- Care should be taken not to compromise any subsequent child protection enquiries or police investigation. Associates should avoid asking leading questions.
- As soon as possible, take care to record what the child has said using the child's own words. Record the date, time and setting and any names mentioned, to whom the information was given and other people present. Sign and date the record. Please record any historical abuse mentioned and refer to the Designated Safeguarding Lead who will support with referring to the Local Authority using the Safeguarding and Child Protection procedures.

Allegations of Historical Abuse

- Responses to allegations by a parent or child/young person that they have been abused in the past must be given the same priority as current abuse.
- There is a significant likelihood that the alleged perpetrator will have continued and may still be abusing children. A criminal prosecution remains a possibility if sufficient evidence can be obtained.
- If a child or adult discloses abuse that happened in the past, the member of Associates must record what is said and details of the allegation. It should be established who is the alleged perpetrator, whether his/her recent or current whereabouts is known and whether the person has or is having contact with children.
- If a child or adult is making the allegations, Treasure Keepers Associates should follow the same procedures as already described.
- Consideration must be given to the therapeutic needs of the adult and reassurance given that even without their direct involvement all reasonable efforts will be made to look into what has been reported.
- The Local Authority whose is responsible for undertaking the Section 47 enquiry will establish if there is any knowledge regarding the alleged perpetrators current contact with children and inform the police and also advise the police whether the adult requests a police investigation.

Recording of Child Protection Concerns

- A careful and full record, (verbatim where possible) should be made of what the child or parent/carer or any other informant has said regarding the child protection concerns.
- Any signs or symptoms of significant harm or injury observed should also be fully recorded as described above, this should be factual, what is actually seen, not what Associates believe may have happened.
- Any action taken or discussion within Treasure Keepers and/or with outside agencies in respect of child protection concerns should be recorded on the child's file within two working days.
- Any significant development in the case should be recorded on the Safeguarding tracking form.
- Relevant Treasure Keepers Associate Practitioners working with the identified family responsible for the case, must update the Designated Safeguarding Lead with any significant development or new information regarding the case.
- Designated Safeguarding Lead- will share all completed Cause of Concerns/Safeguarding Forms with every Associated assigned the family and the Clinical & Service Director.

All registered child protection cases that are logged in the Safeguarding file will be reviewed weekly and the tracking from updated accordingly.

Children subject to a child protection plan

- Treasure Keepers Associates will maintain their safeguarding responsibilities in relation to those children referred to Treasure Keepers who are subject to a child protection plan.
- If there are significant new developments Designated Safeguard Lead will inform the Local Authority immediately and follow the referral procedures as outlined above.
- The only two exceptions to this will be cases where a disclosure has been made of historical abuse and the Local Authority has resolved the matter or where the work has ended with Treasure Keepers and the case has been handed over. However it should not be assumed that historical disclosures had been addressed, and usually Safeguarding and Child Protection procedures should be followed.

Allegations of child abuse involving Treasure Keepers Employees/Associates or other professionals

- Please refer to the Treasure Keepers policy on [Significant Incidences/Notifiable Events](#) .
- An allegation is likely to be considered a notifiable event to Ofsted.
- All safeguarding processes as detailed within this policy would be followed in addition to notifying the LADO and the Local Child Protection Team/MASH.
- The role of the Local Authority Designated Officer (LADO) is to investigate an adult who works with children/young people where:
 - Behaviour has harmed or may have harmed a child
 - Possibly committed a criminal offence against or related to a child
 - Behaviour that may suggest they are unsuitable to work with children
- If any member of Associates at Treasure Keepers becomes aware of concerns or is suspicious about the abuse of a child by a person(s) working for or on behalf of Treasure Keepers these concerns must immediately be discussed with The Designated Safeguarding Lead/Manager or in their absence The Clinical & Service Director. Please also refer to the Treasure Keepers [Whistleblowing policy](#) for further details.
- The requirements for a referral making a child protection allegation in respect of a person(s) working for or on behalf of Treasure Keepers are the same as for all other referrals. If the concern requires an enquiry to be initiated under Section 47, Children Act 1989 a referral should be made to the referring local authority and/or the appropriate local Police Child Protection Team in accordance with the Local Safeguarding Procedures, as well as being a notifiable event to Ofsted.
- Where there is concern that a member of Associates has acted inappropriately, a copy of the referral must also be sent to referring Local Authority Designated Officer (LADO). When referring to the Local Authority there should be immediate discussion with the LADO.
- The Local Authority or the Police will decide whether to convene a strategy meeting to consider how the allegation will be dealt with.
- If there are concerns about the conduct of a professional or any member of the public in respect of a child that members of Treasure Keepers Associates have had contact with then Treasure Keepers Associates should follow the normal procedure of informing the Designated Safeguard Lead.

- The Designated Safeguarding Lead would then contact the Referral and Assessment Team in the area in which the incident occurred or where the child lives, as appropriate.

ADULT SAFEGUARDING

Legislation Framework for Adult Safeguarding

- Human Rights Act 1998
- Sexual Offences Act 2003
- Disability Discrimination Act 2003
- Domestic Violence Crime and Victims Act 2004
- Mental Capacity Act 2005
- Safeguarding Adults - National Framework of Standards 2005
- Mental Health Act 2007
- Care Act 2014
- Anti-Social Behaviour, Crime and Policing Act 2014
- Serious Crime Act 2015
- Counter-Terrorism and Security Act 2015
- Domestic Abuse Act 2021

Practice Guidance for Adult Safeguarding

- Information Sharing Guidance for Safeguarding Practitioners 2018
- The SET Safeguarding Adults (2019)
- SET Prevent Policy and Guidance (2019)

Linked Treasure Keepers Policies

- Conduct Management
- Compliments and Complaints
- Confidentiality
- Covid-19
- Data Protection and Privacy
- Drug and Alcohol
- Health and Safety
- Internet and Computer Use
- Missing, Absent or Away without Notification
- Out of Hours
- Quality Assurance
- Safer Recruitment
- Significant Incident and Notifiable Events
- Supervision
- Whistleblowing

- Visitors

Safeguarding adults means protecting a person's right to live in safety, free from abuse and neglect.

Safeguarding is everyone's responsibility.

To protect vulnerable adults from mistreatment and improve their quality of life, caregivers must follow the principles of the Care Act 2014.

The aims of safeguarding adults are:

- To prevent harm and reduce the risk of abuse or neglect to adults with care and support needs
- To safeguard individuals in a way that supports them in making choices and having control in how they choose to live their lives "Making Safeguarding Personal"
- To promote an outcomes approach in safeguarding that works for people resulting in the best experience possible
- To raise public awareness so that professionals, other staff and communities as a whole play their part in preventing, identifying and responding to abuse and neglect

Definition of an adult at risk:

- Aged 18 years or over;
- Who may be in need of community care services by reason of mental or other disability, age or illness;
- and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

You have the responsibility to follow the 6 safeguarding principles enshrined within the Care Act 2014. The principles aim to emphasise that everyone in care is a human being with wants and needs. They define how important it is to involve a service user in the process of assessing their safeguarding needs.

Six key principles underpin all adult safeguarding work:

Principle 1 Empowerment – Personalisation and the presumption of person-led decisions and informed consent. "I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."

Principle 2 Prevention – It is better to take action before harm occurs. "I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

Principle 3 Proportionality – Proportionate and least intrusive response appropriate to the risk presented. "I am sure that the professionals will work for my best interests, as I see them and they will only get involved as much as I require."

Principle 4 Protection – Support and representation for those in greatest need. “I get help and support to report abuse. I get help to take part in the safeguarding process to the extent to which I want and to which I am able.”

Principle 5 Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. “I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together to get the best result for me.”

Principle 6 Accountability – Accountability and transparency in delivering safeguarding. “I understand the role of everyone involved in my life.”

Alongside the Care Act 2014 principles the Mental Capacity Act 2005 guiding principles should be considered also.

5 Principles Which Underpin The Mental Capacity Act:

In order to protect those who lack capacity and to enable them to take part, as much as possible in decisions that affect them, the following statutory principles apply:

- You must always assume a person has capacity unless it is proved otherwise
- You must take all practicable steps to enable people to make their own decisions
- You must not assume incapacity simply because someone makes an unwise decision
- Always act, or decide, for a person without capacity in their best interests
- Carefully consider actions to ensure the least restrictive option is taken

Categories of Abuse

Abuse and neglect can take many forms. Organisations and individuals should not be constrained in their view of what constitutes abuse or neglect, and should always consider the circumstances of the individual case.

Abuse includes:

- Physical abuse – including assault 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.
- 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.
- Modern Slavery – See human trafficking section.
- 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.

- Self – Neglect – this covers a wide range of behaviour neglecting to care for one’s personal hygiene, health or surrounding and includes behaviour such as hoarding. It is important to consider capacity when self-neglect is suspected. Also consider how it may impact on other family members and whether this gives rise to a safeguarding concern.
- Domestic Abuse/ Violence – Domestic violence and abuse is officially classified as “any incident of threatening behaviours, violence or abuse between adults who are or have been in a relationship together, or between family members, regardless of gender or sexuality”.
- 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, e.g. this may range from isolated incidents to continuing ill-treatment.

Where Associates/Staff become concerned about an Adult they should complete the Cause of Concern/ Safeguarding section of the case note file and share this the Designated Safeguarding Lead.

Paperwork should not take precedent, where concerns are significant serious these should be acted on immediately.

Where an adults physical or mental health or safety is of critical concern emergency services should be contacted without delay.

Where concerns are shared with the Designated Safeguarding Lead, they will use the principles in Child Safeguarding and Protection process and the guiding principles of the Care Act 2014 and the Mental Capacity Act 2005.

Treasure Keepers reporting and recording of adult Causes of Concern/Safeguarding follow the same policy as Child Safeguarding and Protection.

Local Adult Safeguarding procedures will be followed to report any concerns to Local Authority Adult services.

In Thurrock this is SET Safeguarding Adults, referral forms are available online and in the Safeguarding Folder.

Where Associates, Staff Members or Professionals are believed to be responsible for causing or contributing to harm to a Child or Vulnerable Adult there are additional processes Treasure Keepers will follow.

The response to allegations of misconduct by Treasure Keepers Associates / Staff members and professionals will potentially have six related but separate procedures:-

- A Child Protection enquiry, if undertaking by the Local Authority
- Internal Review of processes for learning
- A possible Police Investigation into alleged criminal behaviour
- Disciplinary procedures can be started regardless of the outcome of Child Protection Enquiry or Police Investigation. The Managers will also need to give immediate consideration in conjunction with advice from the Police and the Local Authority as to whether the Associates member should be temporally suspended from work or transferred to other duties pending the outcome of the above investigations

- The need to inform OFSTED regarding the occurrence of a child protection matter – refer to National Minimum Standards
- Referral to the Disclosure and Barring Service.

Duty to referring to Barring Service (DBS)

Treasure Keepers undertake ‘regulated activity’ with children.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

Regulated activity providers (employers or volunteer managers of people working in regulated activity in England, Wales and Northern Ireland) and personnel suppliers have a legal duty to refer to DBS where conditions are met. This applies even when a referral has also been made to a local authority safeguarding team or professional regulator.

- **Legal duty to refer: the below two conditions that must be met.**
- If you are a regulated activity provider or fall within the category of personnel supplier, you must make a referral when both of the following conditions have been met:
- **Condition 1**
 - you withdraw permission for a person to engage in regulated activity with children and/or vulnerable adults. Or you move the person to another area of work that isn’t regulated activity.
 - This includes situations when you would have taken the above action, but the person was re-deployed, resigned, retired, or left. For example, a teacher resigns when an allegation of harm to a student is first made.
- **Condition 2**
 - You think the person has carried out 1 of the following:
 - engaged in relevant conduct in relation to children and/or adults. An action or inaction has harmed a child or vulnerable adult or put them at risk or harm or;
 - satisfied the harm test in relation to children and / or vulnerable adults. e.g there has been no relevant conduct but a risk of harm to a child or vulnerable still exists or
 - been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence

Relevant conduct in relation to children

- A child is a person under 18 years of age.
- Relevant conduct is:
 - endangers a child or is likely to endanger a child
 - if repeated against or in relation to a child would endanger the child or be likely to endanger the child
 - involves sexual material relating to children (including possession of such material)
 - involves sexually explicit images depicting violence against human beings (including possession of such images)
 - is of a sexual nature involving a child
- A person’s conduct endangers a child if they:

- harm a child
- cause a child to be harmed
- put a child at risk of harm
- attempt to harm a child
- incite another to harm a child

Relevant conduct in relation to adults:

- A vulnerable adult is a person aged 18 years or over who is being provided with, or getting a service or assistance which is classed as regulated activity for adults.
- Relevant conduct is:
 - endangers a vulnerable adult or is likely to endanger a vulnerable adult
 - if repeated against or in relation to a vulnerable adult would endanger the vulnerable adult or be likely to endanger the vulnerable adult
 - involves sexual material relating to children (including possession of such material)
 - involves sexually explicit images depicting violence against human beings (including possession of such images)
 - is of a sexual nature involving a vulnerable adult
- A person's conduct endangers a vulnerable adult if they:
 - harm a vulnerable adult
 - cause a vulnerable adult to be harmed
 - put a vulnerable adult at risk of harm
 - attempt to harm a vulnerable adult
 - incite another to harm a vulnerable adult
- A person satisfies the harm test if they may:
 - harm a vulnerable adult
 - cause a vulnerable adult to be harmed
 - put a vulnerable adult at risk of harm
 - attempt to harm a vulnerable adult
 - incite another to harm a vulnerable adult

Look at a list of [examples of harm to vulnerable adults](#) (PDF, 56.3KB, 1 page).

Arrangements for Associates and service users to contact the Local Authority or Registration Authority regarding any concern about child welfare or safety

- Details of how to complain are included in the Children's & Adult welcome packs given to service users.
- This includes the telephone numbers of the Children's Services Referral and Assessment Team, the out of hour's duty team where the child resides and Ofsted.
- Treasure Keepers Associates will also have access to this information.

The role of other professionals contracted to work on behalf of Treasure Keepers

- In some circumstances, Treasure Keepers collaborates on pieces of work with specialist consultants such as a Psychologist or a Psychiatrist who are employees of another organisation.

- When a person from another agency highlights a child protection concern, it is the responsibility of Treasure Keeper's Associate/Staff Member to nevertheless to follow Treasure Keepers policy and procedures as out lined in this document, regardless of whether the sharing professional is following their agency process.

Risk Assessment & Management

Treasure Keepers[®] value the safety of our Young People and their Families/Placements highly.

- Risk information/Trauma Response information is gained at the point of referral on the referral form
- A risk assessment is completed by the Designated Safeguarding Lead/Treasure Keepers[®] Manager as part of the assessment process
- Every Service User is given a Red, Amber or Green (RAG) risk rating
- All Red rated Service Users are reviewed weekly by the Treasure Keepers[®] Manager and this is shared with the Clinical/Service Director
- Intervention records are regularly reviewed by the Treasure Keepers[®] Manager to determine whether their RAG rating is still current and to adjust if required.
- Any concerns about a Service User or Adult are reported to the Service Manager/DSL for decision making, support and management planning.
- Please refer to section titled, '[Communication with the Service Manager/Risk & Crisis Management](#)' within this Policy.

Identity & Visitors

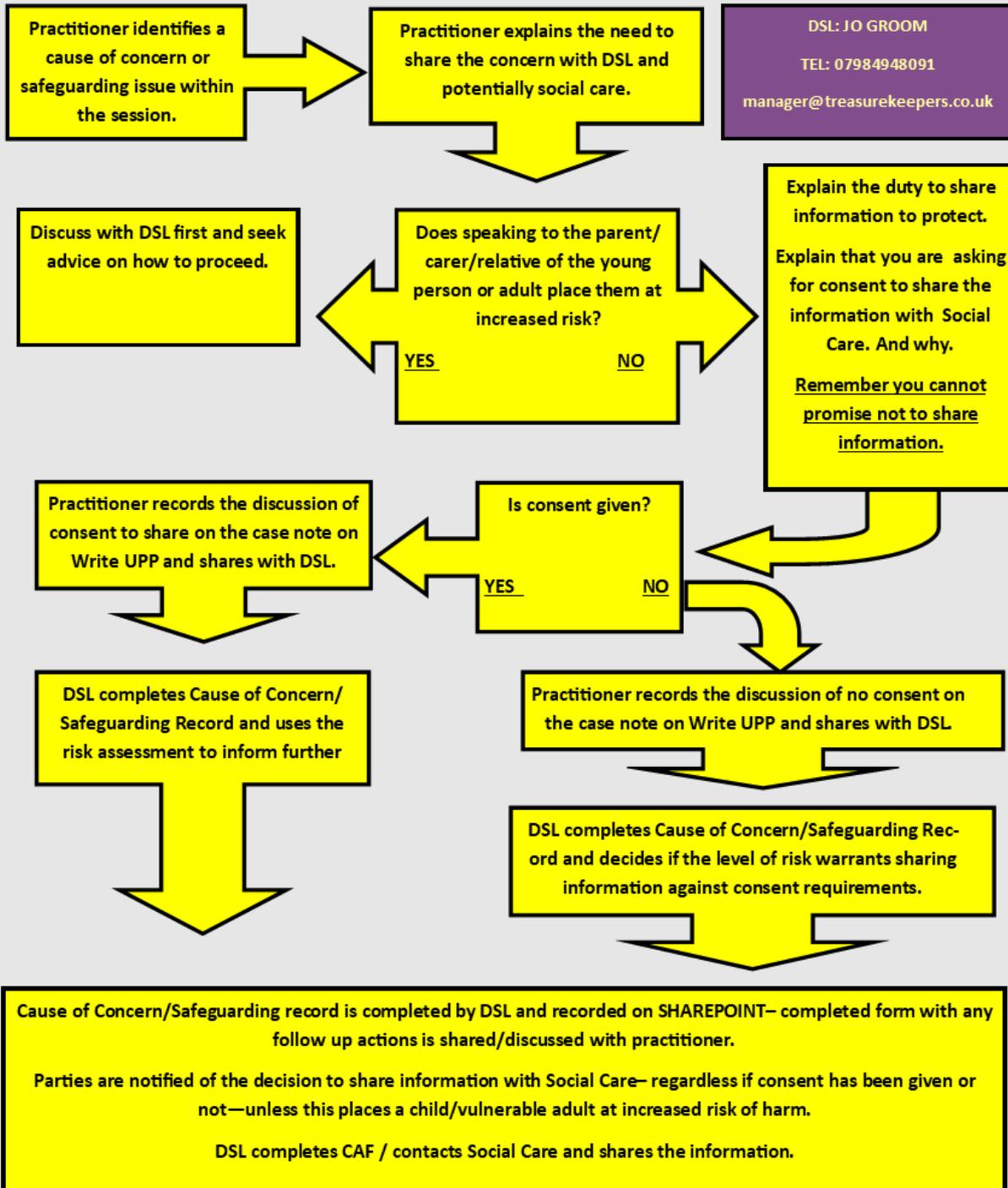
- All Treasure Keepers Employees & Visitors are required to clearly display their company identity card.
- Anyone within the premises without an ID card should be challenged.
- Please refer to the Treasure Keepers [Visitors policy](#) for details about management of visitors within the Treasure Keepers premises.

Treasure Keepers® Safeguarding Flow Chart (Procedure)



TREASURE KEEPERS

SAFEGUARDING PROCEDURE FLOW CHART





TREASURE KEEPERS

CONDUCT MANAGEMENT POLICY

Legislation Framework for Conduct Management Policy

- The Care Standards Act 2000
- The Adoption Support Agencies (England) and Adoption Agencies (Miscellaneous Amendments) Regulations 2005
- Legislation linked to [Child and Adult Safeguarding and Protection Policy](#)

Practice Guidance linked to Conduct Management Policy

- Adoption: National Minimum Standards 2011 (updated 2014)
- HCPC Standards of Proficiency Practitioner Psychologists July 2015
- Ethical Framework for the Counselling Professions Formally adopted 1 July 2018
- Social Work Professional Standards 2020

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Compliments and Complaints
- Confidentiality
- Covid-19
- Data Protection and Privacy (Employees and Associates)
- Equality, Diversity and Inclusion
- Health and Safety
- Missing, Absent or Away without Notification
- Internet and Computer Use
- Medication
- Out of Hours
- Significant Incidents and Notifiable Events
- Supervision
- Trauma Exposure
- Whistleblowing

- Visitors Policy.

Introduction

Treasure Keepers strive for excellence and innovation and only accept the highest standards of conduct from Employees and Associates.

All Employees and Associates are expected to show professional and integrity at all times.

All Employees and Associates are expected to adhere to every Treasure Keepers policy without exception.

Professional Standards

All Practitioners are required to assure their own quality of practice in line with guidance from the Health Care Professionals Council, the British Psychological Society and their own professional regulating bodies.

Employees/Associates are also required to be 'fit to practice' in line with Section 19 Fitness of Workers [The Adoption Support Agencies (England) and Adoption Agencies (Miscellaneous Amendments) Regulations 2005]

This includes:

In the event that an Employee/Associate fails to meet professional standards/Code of Conduct they will be subject to Treasure Keepers Disciplinary (Employees) or contractual review processes (Associates).

This may result in a termination of contract.

Please also refer to the [Significant Incidents/Notifiable](#) Events policy as poor conduct or allegations against Employees/Associates may result in a notification to Ofsted, DBS and Regulatory Bodies such as HCPC/UKCP/BACP.

The Treasure Keepers Code of Conduct

Treasure Keepers promote our TOGETHER Code of Conduct (see below)



- This Code of Conduct outlines our expectations regarding Employee's and Associate's behaviour towards their colleagues, supervisors, Service Users, Overall organisation, and the General Public.
- Treasure Keepers promote freedom of expression and open communication.
- Employees and Associates are expected to follow the TOGETHER Code of Conduct
- Employees and Associates are expected to foster a respectful, relational and well organised environment.

Duties

Associates and Employees are required to devote such of their time, attention, and skill to the business of the Company as shall be necessary for the proper performance of the services agreed.

The Employee/Associate agrees to undertake the services in an expert and diligent manner and to provide their services to the best of their commercial and technical skill, which may reasonably be expected of a professional person acting in their capacity.

Dress Code & Appearance

Employees and Associates are required to dress in a manner that is suitable and appropriate to the Company's business both within the workplace and when representing the Company.

They should present a professional image with regard to appearance and standards of dress.

All Employees/Associates are required to be neat, clean, well-groomed and presentable whilst at work, whether working for the Company. This includes on video sessions.

Personal Hygiene

In addition to the minimum standards of dress and appearance set out above, all Employees/Associates are required to take all reasonable steps to maintain acceptable levels of personal hygiene. This includes ensuring that you do not have body odour, dirty or stale-smelling clothing, dirty hair or bad breath whilst at work, whether working on Company business or representing the Company.

Poor personal hygiene can result in an unacceptable working environment for other employees, given the close proximity in which you have to work, and it can create a negative image of the Company when dealing with service users or clients.

The Company accepts that, occasionally, a problem of body odour or bad breath may be as a result of a health or medical issue and may not always be due to a lack of personal hygiene. In this case, you should seek medical advice from your doctor and follow that advice.

Drug & Alcohol Use

Alcohol and drug misuse or abuse can be a serious problem within the workplace. Employees/Associates who drink excessively or take unlawful drugs are more likely to work inefficiently, be absent from work, have work accidents and endanger their colleagues.

The Company has a duty to protect the health, safety and welfare of all its employees/Associates.

However, the Company recognises that, for a number of reasons, employees/Associates could develop alcohol or drug related problems.

In relation to drugs, these rules apply to those that are unlawful under the criminal law and not to prescribed medication. These rules aim to promote a responsible attitude to drink and drugs and to offer assistance to employees who may need it.

If it is considered that an Employee/Associate has an alcohol or drug problem which affects conduct or performance at work and you refuse the opportunity to receive help, the matter will be referred for action under the Company's disciplinary procedure as appropriate (Employees). Likewise, if after accepting counselling and assistance, and following review and evaluation, your conduct or work performance reverts to the problem level, the matter may also be dealt with through the disciplinary procedure.

Lateness/Absenteeism

All employees/Associates are expected to report for work punctually and to observe the normal hours of work laid down in their contract of employment, including the provision for lunch breaks. Failure to report for work on time is detrimental to the efficient running of the Service.

If Employees/Associates are unable to attend work or are going to be delayed by the weather conditions or due to major disruptions to public transport and/or road networks, you should contact management and/or the setting as soon as possible to discuss your situation

Employees/Associates are responsible for ensuring they arrive/or are ready to work early enough to enable you to begin work at your appointed start time.

If Employees/Associates are going to be late for work, they must make every effort to contact the Manager/Director by telephone as soon as possible to notify of this fact and of the time they expect to arrive.

Failure to Adhere to the Conduct Management Policy

If Employees fail to adhere to the conduct management within this policy (and within the Employee Handbook) then disciplinary processes will be actioned.

If Associates fail to adhere to the conduct management within this policy then termination of contract may be actioned.

Termination of Contract for Associates

If Associates violate the terms of their contract then their contract will be terminated.

This policy is an extension of the agreed contract for provision of services (Associates)



TREASURE KEEPERS

COMPLIMENTS & COMPLAINTS POLICY

Legislation relevant to Compliments and Complaints Policy

- Children Act 1989
- Care Standards 2000
- Adoption and Children Act 2002

Practice Guidance for Compliments and Complaints Policy

- Working Together to Safeguard Children 2018
- Adoption: National Minimum Standards 2011 (updated 2014)
- Practitioner Standards of practice listed in Conduct Management Policy.

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Confidentiality
- Data protection and Privacy
- Drug and Alcohol
- Internet/Computer Use
- Significant Incident and Notifiable Events
- Whistleblowing

Introduction

As a Service we value feedback.

Compliments and complaints are valued as a source of information and enable us to reflect on how we can further improve and innovate in our service.

We encourage feedback from our Service Users (Adults and Children) and have a postbox outside the consultation rooms in which they can post their thoughts and ideas.

All service users, referrers and training course attendees will have access to this policy.

Children and young people also have a separate children's guide which explains the complaints policy. This is available in printout or can be downloaded from our website.

Complaints will be handled with efficiency and each stage will be concluded within 28 days.

Complainants will have the right of appeal.

Confidentiality will be maintained at all stages.

Compliments

Treasure Keepers[®] aims to use compliments to enable us to develop a service of excellence and to encourage all our professionals to be the best they can be.

A compliment may be made about an individual, or the organisation as a whole and may be made by both those external and internal to the service.

Aims of the Compliments Policy

- ✓ To ensure that compliments received are properly recorded, acknowledged and communicated to the individuals who are being complimented.
- ✓ To identify areas for improvement and potential good practice can be identified and used to promote a higher quality of performance.

Making a Compliment

We ask that the individual provides some key information so that we may log the compliment formally. Information we ask for:

- 1) A name (although the compliment provider may remain anonymous)
- 2) The work or Treasure Keepers[®] Associate it is regarding
- 3) Brief details of the compliment.

Any compliments will be passed on to the relevant Associate within 3 working days.

Once the compliment has been dealt with and relevant parties informed Treasure Keepers[®] will record it for future reference, with the information being used for example during staff members appraisals or in the wider context any company performance monitoring reports.

Complaints

Treasure Keepers have a complaints management process.

Such complaints would be invited for submission to the Director of Treasure Keepers or to the Service Manager.

If the complaint should be about the Director, then all Service Users are advised at the point of initial contracting how they can make a complaint to the British Psychological Society; and/or the Health Care Professionals Council; or to Ofsted.

The complaints procedure as detailed below would be initiated by the Director and then if it cannot be resolved through step 1 (informal) then this would follow the process of step 2 (formal) but would be reviewed as in step 3 by the independent person. This would be to avoid bias.

If the complaint is about the Registered/Service Manager, then this should first be raised to the Clinical/Service Director and then the complaints process (see below) will be followed if required.

If a complaint is about the service as a whole then Service Users are advised (In the Children's and Adult's Treasure Keepers Services Guide) to contact their referring Local Authority Commissioning Team.

Aims of the Complaints Policy

- ✓ The aim of this policy is to enable any individual who comes into contact with Treasure Keepers to have information regarding the process in place for receiving formal feedback on the services which we provide.
- ✓ Treasure Keepers believes it vital to operate in an open and accountable way in order to build commissioner and Service User trust and therefore gladly welcomes all types of feedback, including negative.
- ✓ Treasure Keepers® aims to respond to comments positively in order to ensure that we keep our commitment to clients and provide as quality a service as possible.
- ✓ This policy sets out the process that a complaint will go through from its inception to its satisfactory resolution agreed upon by Treasure Keepers® and the complaint creator.
- ✓ Despite the set route that such comments take when received by Treasure Keepers®, every case is considered individually so that the most relevant action is taken.

The purpose of the Complaints Procedure

Initially the purpose of formally processing complaints is to be able to determine the cause of the complaint.

This can then lead us to assess why this complaint came to be and if relevant improve processes to prevent reoccurrence.

There are two desired results of the complaints procedure:

- 1) Initially to ensure that the complainant is fully satisfied with our proposed resolution.
- 2) To enable Treasure Keepers to look at the way we manage services using the complaints to assist us in avoiding the issue occurring again in the future.

By analysing the complaint, we believe we can provide a better quality service to our Users.

We encourage individuals who wish to make a complaint to contact Treasure Keepers directly by email on manager@treasurekeepers.co.uk.

Treasure Keepers always aims to provide a timely response.

The more information provided, the quicker Treasure Keepers will be able to provide a satisfactory response.

Treasure Keepers will ensure complaints can be made by a person acting on behalf of a child. Details of how to do this are provided within the Children's Guide (page 10) which is distributed to every Child and Young Person receiving Treasure Keepers Services.

Our responsibility when dealing with complaints

Treasure Keepers[®] has a responsibility to deal with all complaints impartially and in a confidential manner, with names only being revealed in instances where information is required for any arising legal action.

Although we try to resolve any complaint immediately a formal response will be sent within 5 working days to the individual who has lodged the complaint.

This will either summarise our findings and explain what Treasure Keepers[®] thinks is a fair solution to the complaint, or in more serious cases informing the complainant of the current status of the process and when they should next expect to hear from us.

It is at this point in the process that Treasure Keepers[®] must take the decision if any concerns over an Associate's fitness to practice have been raised.

If this is the case it is our duty to report our findings to the HCPC (or other regulating body), Ofsted (see [significant incidences/notifiable events](#) policy) and cooperate with any further investigations that they may wish to conduct.

Treasure Keepers will ensure that no person making a complaint is subject to reprisal.

Complaints Process

A copy of the Complaints Policy is available for Service Users. This can be downloaded from the website or is available in the welcome pack given to each Service User.

Step 1- Informal:

- i. A complaint about the service can be made verbally, in writing or electronically to the Service/Registered Manager (manager@treasurekeepers.co.uk) or to the Clinical & Service Director Vikki Cohen (vikki@treasurekeepers.co.uk).
- ii. A written or electronic acknowledgement will be sent to the complainant within 5 working days.

- iii. The complaint will be investigated by the Manager, or Director within 10 working days of the complaint being acknowledged.
- iv. The initial action is to discuss the matter informally and they will endeavor to resolve the situation to the satisfaction of the complainant. Ideally a face to face meeting will be held.

Step 2: Formal

- i. If the complaint remains 'active' i.e. unresolved, the Manager will invite the complainant to complete complaints form, providing details of their complaint and the outcome they would like
- ii. A formal investigation will then be carried out to explore the complaint, this process will take 28 days.
- iii. This investigation is likely to involve speaking with professionals at Treasure Keepers, obtaining statements, considering the child's or service user's records and gathering other sources of information.
- iv. Sometimes as part of this investigation the complainant will be invited to a meeting to discuss their complaint.
- v. If the complainant is not satisfied following this meeting, they will be invited to respond to the investigation process in writing.
- vi. This response will go to the Registered Manager and Service/Clinical Director to respond to. If the complainant has a communication problem, then the Registered Manager will communicate with the complainant in the most appropriate way.
- vii. The management team will formally respond in writing within a further 28 days with Treasure Keepers position[®] statement to the complainant, clearly setting out the:
 - Original complaint
 - The range and content of the investigation
 - Content of any statements obtained
 - The management team's conclusion
- viii. The commissioning Local Authority will also be sent a copy of this report.
- ix. If the complainant is unhappy with the formal response, they have a further 28 days to inform Treasure Keepers of this and take the complaint to stage three.

Step 3: Independent Review

The Independent Person, Kirsty Sullivan, will then carry out an independent review of the complaint file.

Our Independent Person is Kirsty Sullivan. Tel: email: kirstysullivanhrservices@gmail.com

A report by our independent person will then be completed within a further 28 days and will have clear conclusions and recommendations.

A copy of this report will be sent to the Complainant and to the Management Team of Treasure Keepers

The Management Team of Treasure Keepers will be obliged to comply with these recommendations.

If the Complainant is still not satisfied, the Complainant is free to engage their commissioning agency's complaints procedure, or contact Ofsted who inspect Treasure Keepers

Ofsted - 0300 123 1231 Piccadilly Gate Store Street Manchester M1 2WD

Other Options

Service Users or commissioning authorities may also lodge a complaint to the professional bodies with Treasure Keepers are registered or accredited.

This may be the Health Care Professionals Council where you will need to complete a referral form about the Practitioner's fitness to practice.

Their website link to this is <https://www.hcpc-uk.org/concerns/>

Referrals can be sent by post or email.

Fitness to Practise Department

The Health and Care Professions Council

184 Kennington Park Road

London

SE11 4BU

If you wish to make a complaint about a Social Workers fitness to practice, the link to the website is here:

<https://www.socialworkengland.org.uk/concerns/raise-a-concern/>

You can call Social Work England on 0808 196 2274 or email enquiries@socialworkengland.org.uk to tell us about what you need, or if you have any questions.

Further Actions by Treasure Keepers

Whilst Associates are not required to engage in a disciplinary process for Treasure Keepers®, we strive for standards of excellence.

If a complaint is investigated and found to have legitimate grounds that indicate poor practice, then the following steps will be followed:

Step 1: The Associate will no longer be used within Treasure Keepers They may also be asked to close their caseload in a clinically ethical way.

Step 2: The Associate will be reported to their governing body. Usually this will be the Health Care Professionals Council. They may then face disciplinary processes through this body.

Step 3: If this complaint involves harm to a Service User this would activate safeguarding processes. This would be to inform the LADO (Service Users Local Authority and Practitioners Local Authority), the Police and Ofsted (via the online notification process - [Tell Ofsted about an incident: children's social care notification - GOV.UK \(www.gov.uk\)](#)). Further details on this process are available in the [significant incidences/notifiable events](#) policy



TREASURE KEEPERS

CONFIDENTIALITY POLICY (COMPANY)

Legislative Framework for Confidentiality Policy

- Human Rights Act 1989
- Data Protection Act 2018

Practice Guidance for Confidentiality Policy

- General Data Protection Regulations
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2015)

Linked Treasure Keepers Policies

- Conduct Management
- Data Protection and Privacy (Service Users and Clients)
- Data Protection and Privacy (Employees and Associates)
- Internet/Computer Use
- Significant Incident and Notifiable Events
- Whistleblowing

Introduction

Associates are likely to obtain knowledge confidential information with regard to the business and financial affairs of the Company and trade secrets and those of the Company's Clients, customers, services users and suppliers details of which are not in the public domain ("Confidential Information"). Confidential information includes (but is not limited to) all information relating to the Psychological Services.

Accordingly, Associates hereby undertake to and agrees with the Company that during their appointment and after its termination, Associates will not use, divulge or communicate to any person, firm or organisation (except in the proper course of the duties during the appointment by the Company) any of the trade secrets or other confidential, technical or commercial information of the Company relating to the business, organisation, accounts, analysis or other affairs of the Company which Associates may have received or obtained or which has come to the knowledge while working for the Company.

Visitors are also expected to adhere to the confidentiality policy when on site and not to disclose any confidential information they should become aware of. Please also refer to the [Visitors Policy](#)

Confidential Information

For this purpose, the term “documents” includes but is not limited to, any papers, notes, correspondence, files, reports, books or other materials, either in physical form or electronic form, paper documents, paper and electronic files and calendars, computer disks, memory sticks, portable hard drives and all other materials capable of storing data and information. either in physical form or electronic form:

1. Made or to be made in connection with the Psychological Services.
2. The Treasure Keepers Parenting model (TREASURE ©); Individual Psychological neuro-sequential approach to individual psychological therapy (GEMS ©); and all training materials and developed materials (such as psychoeducation handouts).
3. Any document or item marked as confidential or which Associates are told is confidential and any information which is given to the Company in confidence by Clients, service users, young persons, agents, Consultants, other company’s, customers or other persons.
4. Any information relating to the trading position, business, products, services, affairs and finances of the Company including (but not limited to) marketing information and plans, market opportunities, product lists, the Company’s financial information, results and forecasts, manpower or expansion plans, the remuneration and benefits paid to the Company’s employees and officers, lists of suppliers, agents, Consultants, employees, distributors, Client’s or customers, service users and their needs and requirements, the terms of business with them and the fees and commissions charged to or by them (if applicable), information relating to prospects and tenders contemplated, offered or undertaken by the Company and any other matters connected with the products or services manufactured, marketed, provided or obtained by the Company.
5. Technical data and know-how relating to the business of the Company or any of its suppliers, agents, Consultants, employees, other company’s or customers including (but not limited to) designs and specifications, ideas, inventions, drawings and plans, research and development, formulae, trade secrets, computer systems and software, costs, margins, prices, business methods, business plans and forecasts and any other technical matters connected with the services manufactured, marketed, provided or obtained by the Company.
6. Any incident or investigation relating to the Company’s operations or business, or confidential reports or research commissioned by or provided to the Company.

Use/Handling of Confidential Information

In particular, Associates will not without the prior written consent of the Company, permit any confidential information:

- to be disclosed, divulged or communicated, whether directly or indirectly, to any third party (including to any other employee or officer of the Company), except to those authorised by the Company to know or as required by law to be copied or reproduced in any form or to be commercially exploited in any way;

- to be used for the own purposes or for any purposes other than those of the Company or to be used or published by any other person;
- to be transferred to the own personal e-mail account, regardless of the proposed reasons for doing so to pass outside the control.

Associates will also not without the prior written consent of the Company disclose, divulge or communicate to any third party, including to any other Consultant or Employee of the Company, agreed pay rates except where such disclosure is expressly permitted by law.

Associates also agree that they will inform the Company immediately upon becoming aware, or suspecting, that a third party knows or has used any of the Company's confidential information. This restriction will continue to apply after the termination of services.

This restriction will cease to apply to any information which may come into the public domain through disclosure by the Company or otherwise than as a result of direct or indirect disclosure by Associates in breach of the terms of this clause.

Associates will keep a record of the confidential information that they receive and will make that information available to the Company on request.

The Company may require production of evidence that shows the deletion from any storage device of any confidential electronic or magnetic information provided to Associates for the performance of his/her duties during Assignments.

Associates shall not at any time after the Termination of this agreement, use or procure the use of the name of the Company in connection with their own or any other name in any way calculated to suggest that they continue to be connected with the business of the Company or in any way hold themselves out as having such connection.

They shall not use the Confidential Information other than during the continuance of this Agreement and in connection with the provision of the Service Provision Contract.

All confidential information is the property of the Company and Associates agree to hand all documents containing confidential information and any copies which are in the possession or under the control over to the Company on the termination of the appointment or, at the request of the Company, at any time during the appointment. For this purpose, the term "documents" includes but is not limited to, any papers, notes, correspondence, files, reports, books or other materials, either in physical form or electronic form, paper documents, paper and electronic files and calendars, computer disks, memory sticks, portable hard drives and all other materials capable of storing data and information. If required by the Company under the terms of this provision, Associates will also give a written undertaking that all confidential information has been duly returned to the Company or permanently deleted or destroyed.

The wrongful disclosure or transfer of confidential information will result in termination of the services of the Associate.

Nothing in this confidentiality policy shall prevent Associates from speaking about an act of discrimination, harassment or victimisation which contravenes the Equality Act 2010, reporting a criminal offence to a law

enforcement agency, co-operating with a criminal investigation or prosecution, doing anything that Associates may be required to do by law or by reason of a regulatory duty, or reporting misconduct or a serious breach of regulatory requirements to a regulator who is responsible for supervising or regulating the matters in question.



CONTINGENCY PLANNING POLICY (FOR SERVICE PROVISION)

Linked Treasure Keepers Policies

- Internet & Computer Use Policy

Introduction

One of the founding principles of the Treasure Keepers Service is 'Teamwork' so we would strive to work together to provide a good enough ending for all of our Service Users in conjunction with the supporting Local Authorities.

Contingency Plan

Should Treasure Keepers[®] find itself in a position where it was unable to continue to provide services we would strive to take a fair, ethical and responsible approach toward our service users.

We would ensure that all clients, services and matters are dealt with ethically and in line with professional standards of practice.

Cases would be closed only where ethical to do so.

Cases requiring a continuing service would be signposted to alternative services able to meet their needs and appropriate referral and handover information would be provided to those services where necessary.



TREASURE KEEPERS

COVID-19 POLICY

Legislation Framework for Covid-19 Policy

- Health and Safety at Work Act 1974
- Coronavirus Act 2020

Practice Guidance for Covid- 19 Policy

- Returning to the workplace: Safety considerations for practising psychologists (May, 2020)
- Coronavirus: how to stay safe and help prevent the spread 2021

Linked Treasure Keepers Policies

- Conduct Management
- Health and Safety
- Quality Assurance
- Whistleblowing
- Visitors

Introduction

Safeguarding and promoting the welfare of children and all Treasure Keepers[®] Service Users and Professionals remains of paramount importance.

The British Psychological Society produced a useful guidance Paper (Returning to the workplace: Safety considerations for practising psychologists (May, 2020) which has been referred to throughout this policy document.

The safety of both clients and psychologists is important when making decisions about the workplace.

Psychologists/Therapists/Associates/Employees should have conversations about safety with clients and their families, including deciding collaboratively how assessments and interventions could take place.

Decision-making on working safely is complex and Psychologists/Therapists/Associates/Employees can refer to policies and guidance from different sources such as government, professional bodies, employing organisations or unions.

Psychologists should be able to determine whether work they would typically undertake can be done safely, or whether adaptations are required to ensure this is the case. Any psychologist who is directed by their employer to work in a situation where they do not feel safe should discuss their concerns with their management. Advice can be sought from their union, where applicable, or ACAS.

Covid Safe Policy

In line with Covid-Safe safety practices, we are doing all we can to ensure that service users and professionals are kept Covid-Safe at all times. However, due to the nature of our work, we are going to do the following to ensure that we are Covid-Safe:

- ✓ Check your symptoms in advance - Do not attend the session if you (or anyone attending the session) have symptoms or if someone in your household has symptoms of Covid.
- ✓ Your Therapist will check in with all attendees for symptoms on arrival – continuous cough, temperature, loss or change in sense of taste or smell.
- ✓ Temperature checks to take place on arrival – forehead or inner wrist. Temperature should be no higher than 37.5. If temperature check shows over 37.5, then there will be a requirement to check temperature again. If temperature still does not come down, then Therapist will explain that the service today cannot go ahead and the Therapist will be in touch to rearrange.
- ✓ Hand gel to be used for all service users on arrival and departure.
- ✓ If hand gel cannot be used, then service user must go and wash hands thoroughly for 20 seconds with hand soap and water.
- ✓ Extended cleaning and hygiene practices between each session.
- ✓ Cleaning between sessions of chairs, door handles etc and enough time to clean and ventilate between sessions.
- ✓ Keep good ventilation through the room whilst maintaining client confidentiality – windows will be kept open to ensure circulation of fresh air, thus reducing the potential risk of Covid transmission.
- ✓ Maintain social distancing in the therapy room.
- ✓ Face Mask to be used where social distancing cannot be maintained in therapy room.
- ✓ Face Mask to be used on entrance to therapy room and on exit from therapy room.
- ✓ The Therapist will not wear a Face Mask during the session, but will remain socially distanced with the room well ventilated, at all times. This is due to the nature of the sessions.
- ✓ Attendees must make every effort to remain and respect social distancing at all times.
- ✓ We ask that all attendees respect and abide by the above rules, and if at any time you have any concerns, please raise them with your Therapist immediately.
- ✓ You have the option to request to return to virtual/online sessions at any time – please speak to your Therapist.
- ✓ If the Therapist has any concerns of Covid symptoms being present, the Therapist reserves the right to end the session to ensure all attendees are safe.

We thank you for your co-operation with these rules, at all times.

Use of PPE Equipment

Due to the different work settings, and varied groups psychologists work with, the need for PPE and the form this takes will depend on a number of factors such as type of setting, work being undertaken and needs of client groups. The decision to wear PPE is informed by employing organisations and health and safety directives. All directions on frequency of changing PPE equipment, and safely removing PPE should be carefully followed.

Prior to any face-to-face appointments with clients, psychologists should inform the client whether or not they will be wearing PPE. They should also inform the client if they expect them to wear PPE.

Challenges of wearing PPE

Despite being considered part of safe-working, the use of PPE presents many challenges. Face masks and visors can be painful to wear, make it difficult for others to hear and appear threatening to some clients. Additionally, it may be difficult to fully express facial emotions when wearing masks, so alternatives such as visors may be considered. All forms of PPE hold the risk of presenting a psychological and emotional barrier between psychologists and their clients

Suggestions to help manage PPE challenges

Depersonalisation Print photo of face on A4 paper to attach to torso, with name badge.

Negative connection with PPE Use psychological techniques to create new positive associations with PPE. This will require gradual exposure, behavioural and cognitive techniques.

Barriers to interaction Practise a range of different interactional techniques, such as exaggerating movement, slowing down talk, smiling with eyes. Acknowledgment of strangeness and normalisation of PPE and new procedures. Transparent masks might alleviate some issues for deaf or hard of hearing groups. Consider virtual consultation.

Caseload Flexibility

- Time and resources will need to be flexible.
- Regular cleaning will be required regularly (e.g. between all appointments) therefore employers will need to allow a reduction of workload to accommodate the extra time needed for safe working. Responsibilities for cleaning should be set out in local agreements.
- Reduced caseloads, and dispersing appointments across the day, will also be important to mitigate busy communal areas such as waiting rooms.
- More administrative time may be needed so that psychologists can send resources to clients via email rather than handing over leaflets in sessions. Additionally, people with significant caring responsibilities affected by the pandemic will need the flexibility to work remotely.

Creating Safe Settings

- Physical safety is paramount for the current situation in the workplace and flexibility and adaptability are essential.
- This means that working remotely should continue where possible.
- Significant progress has been made by psychologists using video-conferencing for team meetings and client work, including with children, since the onset of the pandemic, so there is no immediate imperative to return prematurely to face-to-face work with clients.

- The current situation may need to include working practices that previously were regarded as unusual or unconventional, and will need to be adapted accordingly to the situation.

Outdoor Space Consultations

- Outdoor consultations may be an alternative, with care being taken to maintain client confidentiality.
- This will require thoughtful discussion with clients in advance, so that all views on risk and opportunity are considered.
- Psychologists/Therapists/Associates/Employees will need to bring their ingenuity and adaptability into their new practice.
- This will include being aware of physically safe boundaries, weighing up the need for face-to-face contact, with considerations of social distancing and time spent with people.

Other considerations include:

- Avoiding the use of physical resources that are shared, for example, stationery, paper, assessment tools and physical therapy tools.
- Reviewing practices which involve toys and play when working with children.
- Using e-tools and resources where possible.
- Reviewing the use of waiting rooms.
- Safely managing work clothing, for example, laundering, transporting, storing and changing.
- There will be complex considerations for psychologists when considering their return to the workplace. There will be objective risks to be weighed up alongside subjective factors such as not feeling safe. Psychologists/Therapists/Associates/Employees are encouraged to raise concerns about their own feelings of safety with their supervisor or manager, to help inform decisions surrounding their work practices.

This guidance will be subject to review as pandemic circumstances change and new learning emerges.

References:

Returning to the workplace: Safety considerations for practising psychologists (May, 2020)



TREASURE KEEPERS

DATA PROTECTION AND PRIVACY POLICY (SERVICE USERS & CLIENTS)

Legislation Framework

- Human Rights Act 1989
- Children Act 2004
- Data Protection Act 2018.
- General Data Protection Regulations (GDPR)

Practice Guidance

- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2015)
- Working Together to Safeguard Children 2018

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Confidentiality
- Internet/Computer Use

Introduction

Treasure Keepers is committed to being transparent about how it collects and handles its Service Users/Customers' and their client personal information.

Treasure Keepers aim to protect the privacy and security of personal information both during and after the client/Service User's working relationship with Treasure Keepers®.

All Associates offering services within Treasure Keepers are required to adhere to the guidance provided by the practitioners governing body on accurate record keeping, confidentiality and information governance.

Treasure Keepers is also obliged to adhere to legislation and to meeting its data protection obligations under:

- Data Protection Act 2018.
- General Data Protection Regulations (GDPR)

All Associates and Team Members are required to sign a confidentiality agreement before they begin working with Treasure Keepers to acknowledge they have read and agree to comply with this Data Protection/Confidentiality policy.

Treasure Keepers oversees compliance with this Data Protection/Confidentiality Policy. If the client would like to get in touch in connection with any questions, comments, complaints, or suggestions in relation to this policy or any other queries about the way in which we process information about you, or about how we handle client personal information, please contact Treasure Keepers using the following details:

Please contact our Service Manager and Data Protection Contact:

Jo Groom
Treasure Keepers
Jubilee Pavilion
Love Lane
Ongar
Essex
CM5 9BL

email us at: manager@treasurekeepers.co.uk

Please note, you also have a right to make a complaint to the privacy supervisory authority, The Information Commissioners' Office (ICO):

Information Commissioner's Office (ICO)
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Website: <https://ico.org.uk>
Tel: 0303 123 1113 (local rate)

Visitors to the Treasure Keepers Premises are expected to adhere to the data protection and privacy policy whilst on the premises. No photographs are permitted to be taken to protect privacy. Please refer to the [Visitors Policy](#).

The Data Protection Principles

Under the Data Protection Regulations, there are seven data protection principles that Treasure Keepers must comply with. These provide that the personal information we hold about our customers' client, must be:

- ✓ Processed lawfully, fairly and in a transparent manner;
- ✓ Collected only for legitimate purposes that have been clearly explained to the client and not further processed; in a way that is incompatible with those purposes;
- ✓ Adequate, relevant and limited to what is necessary in relation to those purposes;
- ✓ Accurate and, where necessary, kept up to date;
- ✓ Kept in a form which permits client identification for no longer than is necessary for those purposes;
- ✓ Processed in a way that ensures appropriate security of the data;

- ✓ Finally, Treasure Keepers is responsible for, and must be able to demonstrate compliance with, these principles. This is called accountability.

What types of personal information do we collect?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn't include anonymised data, i.e. Where all identifying particulars have been removed.

There are also "special" of personal information, and personal information on criminal convictions and offences, which requires a higher level of protection because it is of a more sensitive nature. The special categories of personal information comprise information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.

Treasure Keepers collect and hold the following information:

- **Standard personal information:** your name, date of birth, email address, phone numbers, country of residence, marital status, gender.
- **Special (more sensitive) category information:** information about your physical or mental health, genetic information, referrals from social workers, records of medical treatment received, information about your ethnic origin, religion, disability (if any) and any criminal convictions and offences.

How do we collect the information?

We collect and maintain different types of personal information in respect of those individuals who seek to be, are, or were service users, including the personal information contained in:

- Booking appointments
- Adding details to the waiting list
- Medical/health/social care/education reports/letters
- Photographs and video footage
- Psychometric test responses
- Survey Monkey
- Service Records
- All types of communication, including by phone, by email, through our websites, by post, by filling in forms; face-to-face or online (for example during confidential intervention sessions or network meetings).

Third Parties Information

In most circumstances where the personal information that we collect about you is held by a third party (anyone legitimately acting for you) or from the services we use from those third parties, in the course of the performance of their services for us. In that case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Alternatively, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions).

These third parties are usually based in the local authority and referral to our service is usually dependent upon your informed consent.

Examples of third parties include:

- A parent or guardian, if under 18 years old;
- A family member, or someone else acting for you;
- Doctors, other clinicians, health-care professionals and social workers.
- Local authorities and voluntary sector organisations.

When you give us information about other people, please make sure that they have seen a copy of this privacy notice and are comfortable with you giving us their information.

Why and how do we use personal information?

The personal information collected directly from service users or third parties is used and disclosed for our service provision purposes, including establishing a working relationship, managing or terminating your contract relationship with Treasure Keepers

Such uses include:

- ✓ For treatment/assessment/intervention purposes
- ✓ Accurate record keeping
- ✓ Determining the right service and therapist
- ✓ Providing details about services, useful resources.
- ✓ Administering invoice payment
- ✓ Establishing training and/or development requirements
- ✓ Gathering evidence for a complaint
- ✓ Establishing a contact point in the event of an emergency (such as next of kin)
- ✓ Enable us to establish, exercise or defend possible legal claims
- ✓ Internal auditing processes to monitor quality assurance and progress both in individual cases and a company as a whole.
- ✓ Updating service commissioners on the progress of your intervention

Sharing and disclosing your information

No data will be shared with any marketing companies.

We may use your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

This may be in cases where:

- ✓ People or organisations with whom, by law, we must share your personal information (for example, for fraud-prevention or safeguarding purposes, including with the care quality commission)
- ✓ The police and other law-enforcement agencies to help them perform their duties, or by law or under a court order;

For all Service Users, we may need to share your information with:

- ✓ Doctors, clinicians and other health-care professionals, hospitals, clinics, and other health-care providers, especially in emergency situations
- ✓ Suppliers who help to deliver necessary confidential services
- ✓ Those commissioning your intervention/treatment

If we must share your personal information, we will contact you for consent, unless it is unsafe and a matter of protecting individuals from harm.

Treasure Keepers will make sure appropriate protection is in place to protect your personal information in line with all data-protection laws as well as GDPR regulations.

How does Treasure Keepers protect client and Service User's personal information?

Treasure Keepers have put in place measures to protect the security of client and service users personal information:

- ✓ Practitioners maintain awareness of gathering and recorded information so that is not heard or overseen by others
- ✓ All records service user personal information data are kept electronically
- ✓ These electronic records are stored securely
- ✓ These records are kept within the Treasure Keepers database only and should be appropriately filed immediately following any contact with a service user.
- ✓ Any communications via email which could be considered sensitive are sent through a secure system (such as Microsoft 365 'azure protection' service)
- ✓ Any documents or reports containing personal and/or sensitive information should be password protected.
- ✓ The service/registered manager will act as the Data Protection contact – details are above.

Treasure Keepers also have in place procedures to deal with a suspected data security breach and we will notify the information commissioner's office (or any other applicable supervisory authority or regulator) and the client of a suspected breach where we are legally required to do so.

How long is your personal information retained?

For medical records including mental health records:

- ✓ In England, Wales and Northern Ireland, the Records Management Code of Practice for Health and Social Care 2016, outlines the retention periods for people working with or in the NHS. In summary, they are as follows:
- ✓ Children and Young People – until the patient's 25th birthday or 8 years after their death.
- ✓ Mental Health Records – 20 years or 8 years after their death.

All other personal information:

- Except as otherwise permitted or required by applicable law or regulatory requirements, Treasure Keepers will retain your personal information only for as long as it believes is necessary to fulfil the purposes for which the personal information was collected (including,

for the purpose of meeting any legal, accounting or other reporting requirements or obligations).

- We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.
- We may need to keep your information for a specific duration for keeping information set by law or recommended by regulators, professional bodies, or associations. As well as any relevant situations that may apply.

Access to your personal information

- You can ask to see the personal information that we hold about you. If you want to review, verify or correct your personal information, please contact the Treasure Keepers Data Protection Contact, details above.
- When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you.
- Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.
- If we cannot provide you with access to your personal information, we will try to inform you of the reasons why, subject to any legal or regulatory restrictions.



TREASURE KEEPERS

DATA PROTECTION AND PRIVACY POLICY (EMPLOYEES & ASSOCIATES)

Legislation Framework

- Human Rights Act 1989
- Children Act 2004
- Data Protection Act 2018.
- General Data Protection Regulations (GDPR)

Practice Guidance

- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2015)
- Working Together to Safeguard Children 2018

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Confidentiality
- Internet/Computer Use
- Significant Incident and Notifiable Events
- Supervision
- Quality Assurance
- Whistleblowing

Introduction

All Employees & Associates offering services within Treasure Keepers are required to adhere to the guidance provided by the practitioners governing body on accurate record keeping, confidentiality and information governance.

Treasure Keepers is also obliged to adhere to legislation and to meeting its data protection obligations under:

- Data Protection Act 2018.
- General Data Protection Regulations (GDPR)

All practitioners, associates and Team Members are required to sign a confidentiality agreement before they begin working with Treasure Keepers to acknowledge they have read and agree to comply with this Data Protection/Confidentiality policy.

Considering how information is gathered:

There are a number of communication methods that we use in Treasure Keepers:

- Telephone for phone calls, text messages or messaging apps (i.e. Whats App).
- Emails to book appointments, follow up after appointments and share information.
- Online email and recorded keeping.

At all times every possible effort must be made to protect the information and identity of service users, whether in the therapy rooms, at home or in the community.

- Use a strong password method to secure electronic equipment, Laptops, Tablets, Mobile Phones.
- check that your internet access is secure (e.g. use a Virtual Private Network and/or if possible avoid public wi-fi) and that any security features are in use.
- Consider if anyone else can overhear your conversation or view your computer/device screen.
- If completing an online session, you should use a video conferencing tool that has been approved by the Company, Microsoft Teams or Zoom.
- Only access information that you need for the session you are in, close this immediately you finish your session, before you see the next service user.
- You should also consider setting out some terms of use for service users when using online sessions, e.g. do not take screenshots or record the session.

Please also refer to the Treasure Keepers [Internet/Computer Use Policy](#)

Consider how information is stored

- All records are written and kept electronically with no exceptions.
- These electronic records are stored securely only on the authorised Treasure Keepers platform Microsoft 365 Sharepoint and Write Upp.
- Records should be completely promptly_within 48 hours of the session delivery

Consider how information is shared

It is an important part of the 'TEAMWORK' ethos of Treasure Keepers model to work collaboratively with other services who are supporting families within Treasure Keepers.

Information should be shared to support individual care, where necessary.

- When using text messaging or text apps, think about what you are sending and whether it is adequately anonymised, could anyone else see the message and know what it is about?
- When making telephone calls, can you be overheard?
- Any communications via email which could be considered sensitive are sent through a secure system (such as Microsoft 365 'azure protection')
- If you need to share documents outside of Treasure Keepers team, use a secure method i.e. password protected documents or Egress.



TREASURE KEEPERS

DRUG & ALCOHOL POLICY

Legislation Framework

- Children Act 1989
- Adoption and Children Act 2002
- Misuse of Drugs Act 1971

Practice Guidance

- Fostering: National Minimum Standards 2011
- Drug and alcohol proof of concept evaluation, and wider approaches to supporting clients with a dependency April 2017
- List of most commonly encountered drugs currently controlled under the misuse of drugs legislation May 2016 (updated 2019)

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Health and Safety
- Medication
- Quality Assurance
- Significant Incident and Notifiable Events
- Whistleblowing
- Visitors

Introduction

Treasure Keepers are a specialist Trauma Service. As such it is understood that the consumption of drugs and alcohol may be a trauma response.

Conditions For Children & Young People Service Users

If it is considered that a Child or Young Person Service User is using drugs/alcohol as a trauma response and attends a session under the influence they may be permitted to continue with their session.

This is only permitted if they do not pose a risk to Employees, Associates and members of the General Public.

Conditions For Adult Service Users

Adult Service Users are usually being offered Psychological Parenting Consultation interventions.

If they attend a session under the influence of Drugs/Alcohol they will not be permitted entry to the premises and will not be offered their intervention session at this time.

They may be offered advice around signposting to other drug and alcohol support services.

Treasure Keepers [Child & Adult Safeguarding and Child Protection Policy](#) may be actioned.

No Smoking/No Vaping

All workplaces are smoke-free and vape-free and all Employees, Associates and Service Users have a right to work in a smoke-free and vape-free environment.

Smoking and vaping is therefore prohibited in all enclosed and substantially enclosed setting in the workplace.

Smoking and vaping for these purposes includes the use of cigarettes, cigars, pipes, vapes, electronic cigarettes (or e-cigarettes) and any other type of smoking.

This includes work vehicles, even if they are used at different times, and Company or private vehicles used for travelling on Company business where a person aged under 18 is present in the vehicle.

This policy applies to all employees, consultants, contractors, clients, service users or members of the public and visitors.

In addition, when working on behalf of the Company, all staff are prohibited from smoking or vaping within any client or setting or within any place where “No smoking” signs are displayed.

If you wish to smoke or vape, you must do this in your own time either outside your normal hours of work or during designated breaks, such as your lunch break. You are not permitted to take additional smoking or vaping breaks during the day.



**TREASURE
KEEPERS**

EQUALITY, DIVERSITY & INCLUSION POLICY



Legislation Framework

- Human Rights Act 1989
- Care Standards Act 2000
- Equality Act 2010

Practice Guidance

- Equality Act Codes of Practice 2011
- Adoption: National Minimum Standards 2011 (updated 2014)

Linked Treasure Keeper's Policies

- Conduct Management
- Compliments and Complaints
- Data Protection and Privacy
- Medication
- Respect within Treasure Keepers (Anti-Bullying and Harassment)
- Safer Recruitment
- Significant Incident and Notifiable Events
- Supervision
- Whistleblowing
- Visitors

Introduction

Treasure Keepers® are an equal opportunities Service/employer.

Please see the Treasure Keepers Diversity, Equality and Inclusion Statement as shown in the image above.

We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination.

The aim of this policy is to ensure that no individual, service user, applicant, member of staff, Associate, worker or contractor receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment.

As an organisation we value people as individuals with diverse opinions, cultures, lifestyles and circumstances.

All Employees and Associates are covered by this policy and it applies to all areas including recruitment, selection, training, deployment, career development, and promotion.

These areas are monitored and policies and practices are amended if necessary to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct or indirect, overt or latent exists.

The Director has particular responsibility for implementing and monitoring the Equality and diversity policy and, as part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.

All Employees, Associates, workers or self-employed contractors whether part time, full time or temporary, will be treated fairly and with respect.

Selection for employment, promotion, training, or any other benefit will be on the basis of aptitude and ability.

All Employees, Associates, workers or self-employed contractors will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Company.

Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in our Company as it seeks to develop the skills and abilities of its people.

While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers and supervisors, individuals at all levels have a responsibility to treat others with dignity and respect.

The personal commitment of every Employees, Associates, workers or self-employed contractors to this policy and application of its principles are essential to eliminate discrimination and provide equality throughout the Company.

Our commitment as an employer:

Treasure Keepers is committed to:

- ✓ Creating an environment in which individual differences and the contributions of our staff are recognised and valued
- ✓ Every employee, worker or self-employed contractor is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated
- ✓ Providing training, development and progression opportunities to all staff
- ✓ Understanding equality in the workplace is good management practice and makes sound business sense
- ✓ Reviewing all our employment practices and procedures to ensure fairness.

Our commitment as a service provider

Treasure Keepers is committed to:

- ✓ Providing services to which all clients are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, offending past, caring responsibilities or social class
- ✓ Making sure our services are delivered equally and meet the diverse needs of our service users and clients by assessing and meeting the diverse needs of our clients
- ✓ Fully supporting this policy by senior management and ensuring agreement has been reached with employee representatives
- ✓ Having clear procedures that enable our clients, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated

Underpinning Guidance and Legislation

This policy is informed by the Adoption Support Agencies National Minimum Standards (England) Care Standards Act 2000 (Standard 12 – Fair and Competent Employer) and the Equality Act 2010.

Statement of Values.

- ✓ Treasure Keepers value an inclusive approach to all individuals and strive to ensure opportunities are given with no discrimination.
- ✓ We believe that this is how you help cultivate people to be the best they can be.

- ✓ Treasure Keepers work is based on the belief that adults and children are individuals in their own right and that they are of equal worth, regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
- ✓ Treasure Keepers seek to ensure that no person or individual is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance.
- ✓ Treasure Keepers also seek to ensure that no person or individual is victimised or subjected to any form of bullying or harassment.
- ✓ Treasure Keepers are committed to demonstrating respect for human rights.
- ✓ Treasure Keepers are an aspirational service and seek to help cultivate talents, skills and attributes to be used in the best interests of all of our Service Users, Associates and professional partners.
- ✓ We believe that differences in culture and in life experiences brings opportunity for enhanced creativity, expertise and innovation.
- ✓ All Treasure Keepers Associates are expected to embrace, understand and implement this policy.
- ✓ The Clinical/Service Director and Service Manager will hold responsibility for implementing and reviewing this policy as necessary.

Key Principles

Treasure Keepers will ensure that:

- ✓ Associates and service users are treated with dignity and respect.
- ✓ Associates experience fairness and equity of treatment in the workplace.
- ✓ Service users receive fair and equal access to all services.
- ✓ Potential Associates will have equal opportunities to gain a position within Treasure Keepers.
- ✓ Everyone should be treated fairly and without discrimination in relation to their human rights regardless of sex, race, colour, age, disability, sexuality, language, HIV status, religion, birth or other status.

Scope & Implications of the Equalities Policy for Treasure Keepers

- ✓ **Knowledge & Awareness:** Treasure Keepers is committed to providing extending knowledge and awareness on equality and diversity and embedding this into Team workshop events
- ✓ **Recruitment** procedures embody the principles of this policy. Further details are set out in the Recruitment Policy itself.
- ✓ **Access/Provision of Services:** Treasure Keepers are committed to providing a service that is equitable, fair and easy to access. Services are provided in an equitable way which ensures that decision making on 'who gets what' is purely based on clinical need and that no other discriminatory force is in place.
- ✓ **Promotion Opportunities:** will normally be advertised internally, as well as put out to external markets, and are open to all to apply.
- ✓ **Training and Development:** As Associates, all are invited to bring issues around equality and diversity into their monthly supervision sessions. Any areas identified for further development and external training will be supported to enable the Associate to gain completion.
- ✓ **Pay:** Treasure Keepers operates policy of equal pay for work of equal value.
- ✓

Equality in Recruitment of Associates

- ✓ Individuals will be assessed purely on merit, performance and potential and without regard to stereotypes and assumptions.
- ✓ Reasonable adjustments will be made to equipment provided for Associates and service users with disabilities to ensure equality of access to therapeutic work and services.
- ✓ In addition, should an Associate become disabled in the course of their work, every effort will be made through reasonable adjustment, retraining or redeployment to enable them to remain a member of Treasure Keepers.
- ✓ The use of language in advertisements, person specification job description and membership requirements will be clear and concise. This will enable potential applicants to realistically assess their suitability for a position.

Equality in Treasure Keepers Service Provision/Access to Services

- ✓ Service users will be consulted with regards to service provision. Services will be monitored through regular evaluations (at least twice a year) to determine the effectiveness of its services for addressing the needs of its ethnically diverse service users, and to inform future policies and services.
- ✓ To enable fair access to our service for all, the services of translators/interpreters will be employed where necessary.
- ✓ If people have special or additional requirements, we will make every effort to meet their needs ourselves or find alternative services to assist.

Treasure Keepers® Responsibilities & Commitment

- ✓ It is important to Treasure Keepers that our whole service work together to ensure that the working environment is fair, respectful and equitable. Treasure Keepers make a commitment that the environment should also be free from discrimination, harassment and victimisation.
- ✓ Associates are required to read and state that they have understood all relevant policies before they commence working for Treasure Keepers.
- ✓ Associates will be encouraged to bring issues around human rights and equalities issues into our development days and to discuss within supervision sessions
- ✓ Any complaints of discrimination including harassment, victimisation and bullying will be taken seriously and dealt with in line with our complaints policy.

Failure to Comply

Failure to comply with this policy will be considered a serious matter.

Whilst Associates may not be subject to a disciplinary procedure within Treasure Keepers, other penalties will be considered, including ceasing to offer them work and reporting them to their regulating professional body.

In cases where failure to comply has been considered to have compromised the integrity of Treasure Keepers, the Associate may be asked to close their caseload in a clinically ethical way. These cases may then be reallocated accordingly.

The expectation of Treasure Keepers is that there is a **zero-tolerance attitude toward discrimination of any form.**

Equal opportunity policy statements

Age

Treasure Keepers recognise that people are living longer and are experiencing better wellbeing as they grow older. Older people can play a valuable role in providing a home for adopted or looked after children.

Children can also experience age-related discrimination. They may not feel heard or feel that they have any meaningful voice in decision making. We strive to consult and listen to children and help overcome these barriers.

Recruitment decisions are based on people's attributes, talents and skills in relation to the position applied for. Age-related criteria plays no part in this.

We will:

- ✓ ensure that people of all ages are treated with respect and dignity
- ✓ ensure that people of working age are given equal access to our employment, training, development and promotion opportunities and
- ✓ challenge discriminatory assumptions about younger and older people.

Disability

Treasure Keepers will actively work to ensure that Adults and children with disabilities are treated fairly and given opportunities to thrive.

We will:

- ✓ provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities
- ✓ challenge discriminatory assumptions about disabled people and
- ✓ seek to continue to improve access to information by ensuring availability of loop systems, braille facilities, alternative formatting and sign language interpretation when required.

Race/Ethnicity

We will:

- ✓ challenge assumptions/stereotypes about ethnicity and race
- ✓ challenge racism wherever it occurs
- ✓ respond swiftly and sensitively to racists incidents and
- ✓ actively promote race equality in the Company.

Gender

Our policies ensure that all decisions related to recruitment and all service practices are made solely upon evidence of an individual's capabilities. Treasure Keepers expects that all parents, carers, children, Associates and consultants, show no discrimination towards others with regard to gender.

We will:

- ✓ challenge discriminatory assumptions about women and men
- ✓ take positive action to redress the negative effects of discrimination against women and men
- ✓ offer equal access for women and men to representation, services, employment, training and pay and encourage other organisations to do the same and
- ✓ provide support to prevent discrimination against transsexual people who have or who are about to undergo gender reassignment.

Sexual orientation

- ✓ Treasure Keepers welcomes, value and supports all parents, carers, children, Associates and consultants, showing no discrimination in terms of their sexual orientation.

We will:

- ✓ ensure that we take account of the needs of the LGBT community including lesbians, gay men and bisexuals, transgender, gender fluid and non-binary individuals.
- ✓ promote positive images of lesbians, gay men, bisexuals and transgender, gender fluid and non-binary individuals.

Religion or belief

We will:

- ✓ ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible and
- ✓ respect everyone's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

Pregnancy or maternity

We will:

- ✓ ensure that people are treated with respect and dignity and that a positive image is promoted regardless of pregnancy or maternity.
- ✓ challenge discriminatory assumptions about the pregnancy or maternity of our employees and ensure that no individual is disadvantaged and that we take account of the needs of our employees' pregnancy or maternity.

Marriage or civil partnership

We will:

- ✓ ensure that people are treated with respect and dignity and that a positive image is promoted regardless of marriage or civil partnership;
- ✓ challenge discriminatory assumptions about the marriage or civil partnership of our employees and ensure that no individual is disadvantaged and that we take account the needs of our employees' marriage or civil partnership.

Ex-offenders

- ✓ We will prevent discrimination against our employees regardless of their offending background (except where there is a known risk to children or vulnerable adults).

Equal pay

- ✓ We will ensure that all employees, male or female, have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value.

People Living with HIV or AIDS

- ✓ Treasure Keepers[®] recognize that stigma and discrimination, together with health-related stress, can be difficult for people living with HIV and AIDS. We acknowledge the need to provide extra support to people affected by HIV and AIDS.



TREASURE KEEPERS

HEALTH & SAFETY POLICY

Legislation Framework

- Health and Safety at Work 1974
- Children Act 1989
- Human Rights Act 1989
- Reporting of Injuries, Diseases and Dangerous Occurrence Regulations, 1995 (RIDDOR)
- Adoption and Children Act 2002
- Care Standards Act 2000
- The Adoption Support Agencies (England) and Adoption Agencies (Miscellaneous Amendments) Regulations 2005

Practice Guidance

- Adoption: National Minimum Standards 2011 (updated 2014)

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Covid-19
- Conduct Management
- Internet/Computer Use
- Medication
- Out Of Hours
- Safer Recruitment
- Significant Incident and Notifiable Events
- Whistleblowing
- Visitors

Introduction

- Treasure Keepers is committed to a safe and healthy workplace environment.

- The Health and Safety at Work Act 1974 along with other regulations and approved Codes of Practice secure the health, safety and wellbeing of not only employees of the Treasure Keepers but all Service Users associated with Treasure Keepers Practices and activities.
- Treasure Keepers[®] has a small premises which Clients/Service Users can be seen within and also may offer consultation and training in family/placement homes as well as in training venues.
- Treasure Keepers[®] does not employ more than five persons directly and therefore an extensive Health and Safety Policy is not a legal requirement for practice.
- However, Treasure Keepers highly value the health, safety and well-being of our small number of employees and of all of our Service Users (Children, Young People and Adults) that we work with.
- The successful management of health and safety at work requires active participation of every Employee & Associate for Treasure Keepers.

Although the Treasure Keepers Director has delegated responsibility for the establishment of suitable and sufficient arrangements for health, safety and wellbeing for everyone working or visiting Treasure Keepers property; all staff, clients and registered visitors have a duty to ensure that they behave in a manner that will not affect the welfare of colleagues and/or clients.

RIDDOR Responsibilities:

- ✓ Treasure Keepers comply with the 'Reporting of Injuries, diseases and dangerous occurrence regulations', 1995 (RIDDOR)
- ✓ Treasure Keepers have a duty to protect the Health and Safety of all Employees, Associates and Members of the general public.
- ✓ Treasure Keepers must report any work-related deaths or injuries, work-related diseases and dangerous occurrences (RIDDOR)
- ✓ Injuries include:
 - Broken Bones
 - Injuries Lasting over 3 days
 - Injuries requiring hospital attendance

Ofsted Notification:

Please refer to the [significant incidents/notifiable events policy](#) and ensure reporting processes are followed if required.

Reporting Processes for Accidents/Incidents & Near-Misses

When an Accident/Incident/Near-Miss occurs within the premises, during an intervention/consultation session or during your time with a Service User the following processes should be actioned:

1. Take any first aid or emergency service action to make the harmed/potentially harmed person safe
2. Contact the Manager (07984948091) or Director (07930566428) verbally by telephone (if possible) to notify of the Accident/Incident/Near-Miss
3. Complete the Accident/Incident/Near-Miss Form without delay and MUST be completed within 24 hours.

<https://treasurekeepers.sharepoint.com/Shared%20Documents/Safeguarding%20&%20Child%20Protection/incident-accident-reporting-form-template.doc>

This can be found within the Safeguarding & Child Protection Folder on the Treasure Keepers Team Site.

4. Email this form to the Manager (manager@treasurekeepers.co.uk) and in her absence to the Director vikki@treasurekeepers.co.uk
5. Manager/Director reviews the information and makes the decision whether this is reportable under RIDDOR and/or notifiable to Ofsted (refer to [significant incidents/notifiable events policy](#)).

Practical Arrangements for First Aid

Treasure Keepers have a first aid kit located within each of the consultation rooms in the premises.

If this is not present this should be immediately reported to the Manager/Director

Treasure Keepers' Health & Safety Responsibilities:

- ✓ The environment that children, young people or adults are seen within is fit for purpose, private and poses no risks to those in consultation.
- ✓ Treasure Keepers premises are maintained to a standard to be fit for purpose to see children, young people, Adults or any Service Users within.
- ✓ Risk Assessments have been completed where appropriate.
- ✓ Infectious disease management has been appropriately considered by the organisation. Please see '[COVID-19 Policy](#) as an example).
- ✓ There is access in consultation rooms to a first aid kit. There is information available on first aid.
- ✓ Access to supervised practice for all practitioners/trainee psychologists and Assistant psychologist to ensure safe practices
- ✓ Ongoing training and continuing professional development opportunities for all service members/employees.
- ✓ That enhanced DBS checks and safer recruitment procedures are undertaken for all new personnel (see '[Safer Recruitment Policy](#)' for further details).
- ✓ Appropriate Professional Insurances are in place to protect all Service Users.
- ✓ There is a responsibility to lead, motivate and encourage staff/students or Service Users to report on hazards and to discuss all matters relating to health and safety.
- ✓ Adequate control of the health and safety risks arising from work activities;
- ✓ To consult with Treasure Keepers Practitioners and Service Users on matters affecting their health and safety
- ✓ To provide and maintain safe equipment
- ✓ To ensure safe handling and use of any substances
- ✓ To prevent accidents and cases of work-related ill health
- ✓ To maintain safe and healthy working conditions
- ✓ To review and revise this policy as necessary at regular intervals.
- ✓ Please be aware of the Treasure Keepers [Out of Hours Policy](#) and when the Service is active.

Professional responsibilities of Treasure Keepers® Associates/Employees

- Since 2009 the Health and Care Professions Council (HCPC) has regulated the ethical practice and continuing professional development of practitioner psychologists. Treasure Keepers Trainee or

Assistant Psychologists are also required to adhere to the same professional practice guidance as indicated above for Chartered Psychologists.

- Chartered psychologists work within the professional framework of the *Code of Ethics and Conduct* (BPS, 2009) and *Generic Professional Practice Guidelines* of the British Psychological Society (BPS, 2009). Chartered status is awarded to psychologists who have met specified criteria through training and supervision, who are bound by the code and guidelines and who have a commitment to continuing professional development.
- These professional bodies provide an additional framework for valuing the health and safety of all individuals that Treasure Keepers practitioners work with.
- All other professionals working within Treasure Keepers[®] are required to work within their professional frameworks with regard to health and safety.

Employees/Associates should ensure:

- ✓ An ability to monitor their fitness to practice. This should be supported through regular supervision.
- ✓ The environment that children, young people, adults or any Service Users are seen within is fit for purpose, private and poses no risks to the individuals in consultation.
- ✓ That they have their own professional liability insurance.
- ✓ All hazards should be reported to the Director and all matters relating to health and safety should be raised with the Director.

Identity & Visitors

- Treasure Keepers have a safer recruitment policy which ensures that all Employees and Associates are carefully vetted.
- All Treasure Keepers Employees & Visitors are required to clearly display their company identity card.
- Anyone within the premises without an ID card should be challenged.
- Please refer to the Treasure Keepers [Visitors policy](#) for details about management of visitors within the Treasure Keepers premises.

Lone Working Practices

The Company discourages lone working in Service Users homes and will avoid the need for employees or self-employed Associates to work alone where reasonably practicable.

Working alone can bring additional risks to a work activity.

Any deviation from this must be discussed prior to the home visit with either the Service Manager or the Clinical and Service Director.

Where it is identified that assessment or intervention should be offered in the family/placement home this should be managed in a way which minimises risk to the practitioner if they are lone working, through a risk assessment.

The Company will take all reasonable steps to ensure the health, safety and welfare of employees and self-employed Associates working alone.

Apart from employees and self-employed Associates being competent in doing the job on their own, the three most important things to be certain of are that:

- ✓ the lone worker has full knowledge of the potential hazards and risks to which he or she is being exposed
- ✓ the lone worker knows what the task entails and what to do if something goes wrong
- ✓ a suitable person knows the whereabouts of a lone worker and what he or she is doing.

Procedure

Lone working can be safe, provided employees and self-employed Associates take the following basic precautionary measures:

- ✓ Ensure your appointments are recorded on the Write Upp calendar- you should indicate where the session is taken place.
- ✓ If the session is an assessment or it's suitable a social work connected to the family should be invited
- ✓ Ensure that the Company, Management and a family member/friend is aware you are working alone, where you are, what you will be doing and what time you expect to finish.
- ✓ Make sure you have some means of communication with someone in the event of an emergency, such as a mobile phone.
- ✓ Associates should communicate with the Service Manager or Clinical & Service Director prior to the session and after.
- ✓ Ensure you have access to first aid equipment.
- ✓ Know where your nearest emergency exit is.
- ✓ Make sure intruders cannot access the premises by checking that windows and external doors are locked.
- ✓ Comply with any arrangements provided by the Company for lone working.
- ✓ Take all reasonable steps to ensure your own safety.
- ✓ Inform the Company as soon as possible of any incidents or safety concerns.

Treasure Keepers should ensure that:

- ✓ Where possible, lone working is avoided as far as is reasonably practicable.
- ✓ arrangements are in place so that someone is aware of a lone worker's whereabouts at all times and a check is carried out at the end of the lone working period.
- ✓ Emergency procedures are in place so that lone workers can obtain assistance if required. This can include a pre-agreed safe word for discreetly alerting Management or others if you are in distress.
- ✓ Lone workers are provided with adequate information and training to understand the risks and the safe working procedures associated with working alone.
- ✓ Any employee working alone is capable of undertaking the work on their own.
- ✓ The job can be done safely by one person.

For the Director if there are any elevated risks in sole working on particular cases there is a recommendation to inform the clinical supervisor of whereabouts and time of exit. Other relevant persons may also be informed of exit and whereabouts to minimise risk.

Whistleblowing Policy

All Practitioners or associates working with Treasure Keepers[®] are required to adhere to and understand whistleblowing procedures.

There is a clear duty for such people to report to an appropriate authority any circumstances which they consider likely to significantly harm the safety, rights or welfare of any child receiving a service by Treasure Keepers.

Please refer to the [Whistleblowing Policy](#) for more details



TREASURE KEEPERS

INTERNET & COMPUTER USE POLICY

Legislation Framework

- Health and Safety at Work 1974
- Malicious Communications Act 1988
- Children Act 1989
- Adoption and Children Act 2002

Practice Guidance

Linked Treasure Keeper's Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Confidentiality
- Contingency Planning
- Data Protection and Privacy (Service Users and Clients)
- Data Protection and Privacy (Employees and Associates)
- Significant Incident and Notifiable Events
- Whistleblowing
- Visitors

Introduction

Some Employees/Associates have access to computers at work for use in connection with the Company's business.

Computers are provided to employees to undertake business-related activities only.

Employees/Associates who are discovered unreasonably using the Company's computers for personal and private purposes may be dealt with under the Company's disciplinary procedure (or through the [Conduct Management Policy](#) for Associates).

As many computer files contain confidential and sensitive user, client and business information, the Company takes the security of these files very seriously. With this in mind, we have introduced some basic security precautions that all employees must abide by.

- ✓ if you need to leave your computer for more than a couple of minutes, lock the computer
- ✓ if you need to leave your computer for a long period of time, log off - never leave an unattended computer logged on
- ✓ computer passwords are considered our confidential information even if you are using your personal password for social networking to login to our work systems.
- ✓ always keep your password private, do not write it down and do not divulge it to anyone else
- ✓ if you suspect that someone knows your password, change it in the normal way
- ✓ change your password at regular intervals in any event
- ✓ always shut down your computer when you finish your working day
- ✓ if you notice any suspicious activity, for example an employee trying to gain unauthorised access to another member of staff's computer, notify the Manager and/or Director immediately

Please note that Visitors are also required to adhere to this policy whilst on the premises. Please see [Visitors Policy](#).

Data Management

The computers and the data they contain are provided to undertake business-related activities and to enable you to carry out your job duties.

As such, data should not be amended, deleted, copied or taken away unless this is both specifically related to the work you are undertaking, and you have the authority to make such amendment, deletion or copy.

In particular, you should not delete or amend any documentation or programs which are stored on the Company's communal drives unless you have the requisite level of authority to do so.

Non-work-related data should not be copied onto or stored on Company computers.

Some employees may be provided with portable storage devices, such as memory sticks and portable hard drives, which can be plugged into the USB port of a computer. Whilst they are provided so as to allow for the copying and transferring of files and images between an employee's desktop or laptop computer, their small size and storage capacity makes them vulnerable to misuse. For this reason, any employee issued with these devices must not transfer any data to a third-party computer (including one at home) without first having obtained approval from Vikki. From time to time, user guidelines will be produced on the usage of such devices and employees will be expected to follow them. Any employee who transfers files to a third party without permission is likely to be subject to disciplinary action.

Please also refer to the Treasure Keepers [confidentiality](#) and [data protection and privacy](#) policies

Social Media

Social media is an interactive online media that allows users to communicate instantly with each other or to share data in a public forum. It includes social and business networking websites such as Facebook, Twitter, Instagram and LinkedIn.

Social media also covers video and image sharing websites such as YouTube, SnapChat and TikTok, as well as personal blogs. This is a constantly changing area with new websites being launched on a regular basis and therefore this list is not exhaustive. This policy applies in relation to any social media that employees may use.

Employees are not permitted to log on to social media websites or to keep a blog using the Company's IT systems and equipment.

This includes, mobile and smart phones, tablet, laptop and hand-held devices distributed by the Company for work purposes.

The Company reserves the right to restrict access to this type of websites at any time.

Where employees have their own computers or devices, such as tablets, laptops, smart phones and hand-held devices, again they must limit their use of social media on this equipment to outside their normal working hours.

Contravention of this policy

Failure to comply with any of the requirements of this policy is a disciplinary offence and may result in disciplinary action being taken under the Company's disciplinary procedure.

Depending on the seriousness of the offence, it may amount to gross misconduct and could result in the employee's summary dismissal.

For Associates this will be considered in line with the [Conduct Management Policy](#) and could lead to a termination of contract.



TREASURE KEEPERS

MEDICATION POLICY

Legislation Framework

- Health and Safety Act 1974
- Children Act 1989
- Adoption and Children Act 2002
- Care Standards Act 2000
- The Adoption Agencies Regulations 2005

Practice Guidance

- Adoption National Minimum Standards 2011

Linked Treasure Keeper's Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Drugs and Alcohol
- Health and Safety
- Significant Incident and Notifiable Events
- Whistleblowing
- Visitors

Introduction

Treasure Keepers are committed to keeping our Service Users safe and healthy.

Responsibilities of Employees & Associates

- Employees & Associates are not permitted to administer any medication or advise on medication usage
- Employees & Associates should ensure that any personal medication is kept securely and out of reach of Service Users and this is not left unattended.
- Any personal medication of the Employee/Associate should be kept to a minimum.



TREASURE KEEPERS

MISSING, ABSENT OR AWAY WITHOUT NOTIFICATION POLICY

Legislation Framework

- Children Act 1989
- Adoption and Children Act 2002
- Care Standards Act 2000
- The Adoption Agencies Regulations 2005

Practice Guidance

- Adoption National Minimum Standards 2011
- Department of Education Statutory Guidance on Children who Runaway or Go Missing from Home Association of Chief of Police (ACPO) in 2013.

Linked Treasure Keeper's Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Health and Safety
- Out of Hours
- Quality Assurance
- Significant Incident and Notifiable Events
- Supervision
- Visitors

Guiding Legislation/Framework

Responding to missing episodes should be responded to in accordance with current legislation and guidance with specific reference to the updated Statutory Guidance on children who run away or go missing from home or care issued by Department for Education in January 2014.

In particular Children's Social Care will consider what assessment and intervention needs to be carried out following a missing person episode, and will give due consideration to the level of risk and vulnerability for the child or young person, in deciding on the most appropriate response

It is recognised that children and young people missing from home may be considered 'Children in Need' and may therefore be entitled to a service under Section 17 of The Children Act 1989.

Furthermore, it is recognised that dependent on individual circumstances such as parental response, the child or young person may be considered at risk of, or subject to, significant harm and therefore in need of protection. In these circumstances child protection procedures would be followed. If these thresholds are not met the child's needs may be responded to by a multi-agency approach under the Common Assessment Framework (CAF).

The following principles should be adopted by all agencies in relation to identifying and locating children who go missing:

- A child first approach should be taken. The child's safety and welfare is paramount whatever the circumstances.
- Locating and returning the child to a safe environment is the main objective
- Child Protection Procedures will be initiated whenever there are concerns that a child who is missing may be at risk of significant harm.

Report to relevant authorities

Definition of 'Missing' & Absence

"Missing – Anyone whose whereabouts cannot be established and where the circumstances are out of character, or the context suggests the person may be subject of a crime or at risk of harm to themselves or another." Department of Education Statutory Guidance on Children who Runaway or Go Missing from Home Association of Chief of Police (ACPO) in 2013.

Therefore, a child (i.e. under the age of 18 years) is to be considered 'missing' if their whereabouts are unknown, whatever the circumstances of their disappearance.

They will be considered missing until they are located and their wellbeing or otherwise is established.

"Absences - 'A person is not at a place where they are expected or required to be'.

Unauthorised Absence definition

'Away from placement without authorisation: a looked after child whose whereabouts is known but who is not at their placement or place they are expected to be and the carer has concerns or the incident has been notified to the local authority or the police'.

This category is critical to the clarification of roles of the Police and Children's Social Care.

Some children absent themselves from home, care or school for a short period and then return, often their whereabouts are known or may be quickly established through contact with family or friends or are unknown but the children are not considered at risk. Sometimes children stay out longer than agreed as a boundary testing activity which is well within the range of typically normal adolescent behaviour.

These children have taken 'unauthorised absence', and would not usually come within the definition of 'missing' for this Procedure. If a child's whereabouts are known then they cannot be 'missing'. However, if they are known to be staying somewhere where they are in danger and it is not possible for the carer/ person with parental responsibility to remove the child or young person, then it may still be necessary to involve Police and partners in safeguarding them.

In the case of Looked after children, Social Workers and partner agencies should always consider whether an unauthorised return to family and friends or, for older young people, trips abroad or staying with a friend boy/girlfriend, place a child / young person at risk.

Unauthorised absences must be carefully monitored and the reasons that led to the child's "flight" response, addressed. This is an earlier indicator that a child may later escalate to going missing.

Patterns in absent episodes also need to be monitored, and this can be done via weekly missing and absent spreadsheet.

If a Young Person does not arrive for an intervention session

- All Employees/Associates are expected to mark any missed intervention sessions on the Young Person's/Parent-Carer intervention record.
- The Employees/Associates should try to make contact with the young person and /or their parent or carer to establish the reason for absences.
- The Employees/Associates also are required to immediately notify the Manager of this missed session.
- The Manager then decides on the course of action to take:
 - First missed session where Employees/Associates has been unable to establish reasonable contact with the family, the Manager will try to contact the family (or Social Care Team if a Looked After Child). To identify any barriers or issues in attending.
 - If there are multiple missed sessions the Manager will report this to all relevant stakeholders/social care/family members.
 - A Treasure Keepers[®] Cause of Concern/Safeguarding form to be completed following more than three missed sessions to establish Safety and Risk factors for the young person.
 - If there are concerns about the welfare of the young person a Common Assessment Framework (CAF) will be completed and sent to the relevant Local Authority.

If a Young person leaves during an intervention session

- If the young person cannot be found in the immediate vicinity of the room where the intervention session is taking place, the Associate should:
 - Immediately notify security/a staff member at the facility they are at then
 - Contact the carer or parent who accompanied the young person to the sessions to check if they are with the young person then
 - Finally notify the Manager without delay.
- The Manager then notifies the relevant stakeholders/social care/family members/police.
- This would be considered a 'Near Miss' incident and should be reported by the Designated Safeguarding Lead on the 'Accident/Incident/ 'Near Miss' form' and is retained in the 'Health & Safety Folder' and on the Service Users Caseload File.
- When the child is safely located then the Manager/Associate will then try to engage with the Child/Young Person to determine what are the barriers or issues involved were.

Absences that cause concern are those where:

- There is no indication that the child is likely to return to sessions within a reasonable period of time with no suitable explanation; and/or

- Frequent / persistent absences that may seem insignificant on their own but together create a pattern that may be cause for concern.
- In this situation, the Designated Safeguarding Lead would make contact with the Local Authority/Holding Adoption Team to raise awareness of these episodes.
- There may also be a discussion regarding an action plan to support.



TREASURE KEEPERS

OUT OF HOURS POLICY

Legislation Framework

- Health and Safety Act 1974

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Health and Safety
- Internet and Computer Use
- Visitors

Treasure Keepers Out of Hours refers to the following time periods:

- After 6pm and before 9am Monday to Friday
- All Day Saturday & Sunday
- All Public Holidays

The out of hours policy applies throughout the periods listed above and, without exception, to all Employees and Associates.

The policy must also apply to all visitors and contractors.

Employees and Associates are not permitted to work outside of these hours without express permission from Treasure Keepers Senior Leaders (Manager/Director)

All Employees and Associates must be familiar with the relevant operation relating to emergency procedures, fire alarms and extinguishers, telephones and emergency contact numbers, and first aid boxes.

Lone Working

All Employees and Associates are required to work within the [Lone Working practice](#) guidance within the [Health & Safety Policy](#)

If A Service User Makes Contact Out of Hours

- There is no obligation for any Treasure Keepers Employee or Associate to respond to communication from Service Users, Professionals or the General Public out of hours.
- Employees and Associates have their working hours displayed on their signature strip
- They are also advised to have an 'out of office' function enabled on their emails.
- Out of Office message should indicate that the service is closed with advice on who to contact in an emergency.



**TREASURE
KEEPERS**

QUALITY ASSURANCE POLICY

Legislation Framework

- Children Act 1989
- Adoption and Children Act 2002
- Children Act 2004
- Care Standards Act 2000
- The Adoption Agencies Regulations 2005

Practice Guidance

- Adoption National Minimum Standards 2011

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Compliments and Complaints
- Supervision
- Significant Incidents and Notifiable Events
- Trauma Exposure

Introduction

Quality of Service is of the utmost importance to Treasure Keepers.

Assurance of the quality of services provided is supported through the following processes.

Service Review

The service is reviewed and a report provided on a 6 monthly basis by the Treasure Keepers Service Manager and Director.

This report tracks whole service outcomes, service performance, service user feedback, highlights & milestones, challenges & risks, business continuity and service development & improvement.

Outcome & Satisfaction Measures

- ✓ Each referred client is also reviewed on a regular basis and outcome measures are taken.
- ✓ The psychometric outcomes collected for the whole service are also reviewed every 6 months.
- ✓ Client satisfaction measures are also taken regularly.
- ✓ A database is kept of this information
- ✓ This information can then be collated for service development purposes and to review key performance indicators and outcomes for our service users.

Contract & Clinical Review

There are regular contract and clinical review meetings with the funding Local Authority so assure practice and contractual commitments are reviewed and monitored.

Service Audit

The Service is reviewed every 6 months.

The audit gathers and analyses data on:

- ✓ **Quality of recordings.** Instructions are provided to all Employees and Associates around expectations
- ✓ **Attendance to clinical and case management supervision.**
- ✓ **Safeguarding and risk assessment review** (every case is risk reviewed every 3 months minimum. Higher risk cases will be reviewed more frequently)
- ✓ **Quality of reports.** Instructions are provided to all Employees and Associates around expectations. This includes tracking of intervention plan outcome review & psychometric outcome review.

Professional Standards/Code of Conduct

All Practitioners are required to assure their own quality of practice in line with guidance from the Health Care Professionals Council, the British Psychological Society and their own professional regulating bodies.

Employees/Associates are also required to be 'fit to practice' in line with Section 19 Fitness of Workers [The Adoption Support Agencies (England) and Adoption Agencies (Miscellaneous Amendments) Regulations 2005]

This includes:

- ✓ Being able to engage in evidence-based and evidence-informed practice, evaluate practice systematically and participate in audit procedures
- ✓ Being able to gather information, including qualitative and quantitative data, that helps to evaluate the responses of service users to their care or experience
- ✓ Being aware of the role of audit and review in quality management, including quality control, quality assurance and the use of appropriate outcome measures
- ✓ Being able to maintain an effective audit trail and work towards continual improvement
- ✓ Being aware of, and able to participate in, quality assurance programmes, where appropriate
- ✓ Being able to evaluate intervention plans using recognised outcome measures and revise the plans as necessary in conjunction with the service user
- ✓ Being able to revise formulations in the light of ongoing intervention and when necessary reformulate the problem
- ✓ Being able to recognise the need to monitor and evaluate the quality of practice and the value of contributing to the generation of data for quality assurance and improvement programmes
- ✓ being able to monitor agreements and practices with service users, groups and organisation
- ✓ Being able to review personal resilience to maintain the demands of the role

In the event that an Employee/Associate fails to meet professional standards/Code of Conduct they will be subject to Treasure Keepers Disciplinary (Employees) or contractual review processes (Associates).

This may result in a termination of contract.

Please refer to the Treasure Keepers [Conduct Management Policy](#) for further details.

Please also refer to the [Significant Incidents/Notifiable](#) Events policy as poor conduct or allegations against Employees/Associates may result in a notification to Ofsted, DBS and Regulatory Bodies such as HCPC/UKCP/BACP.

Report Provision

- All reports are quality assured both by the Treasure Keepers[®] Director and Treasure Keepers[®] Service Manager.

Practitioner Selection

We recruit only well qualified mental health professionals on an associate basis who have a knowledge and special interest in developmental trauma.

Trainees are only considered if they are in their final stages of professional qualification as a Practitioner Psychologist (in their Doctoral year of qualification). They are required to have substantial experience in treatment of people suffering from trauma related conditions.

All Associate Practitioners have extensive experience and specialist training in the model endorsed by Treasure Keepers®

Our selection process includes: reviewing CV's; clinical interview by the Director; obtaining references; and verification of qualifications, professional accreditation and professional indemnity insurance.

Case Allocation

All referrals for psychological therapy are reviewed and assessed by the Director prior to allocation in order to ensure the most appropriate Practitioner is identified, in terms of relevant skills and experience.

Monitoring and supervision

All our Employees & Associates (including the Director) are supervised throughout the course of intervention for each referral they undertake.

Supervision ensures that cases are appropriately clinically managed. The frequency of supervision is dictated by the complexity of the case.

However, Employees & Associates can contact the Treasure Keepers® Director at any time should the need arise for example if the client is experiencing crisis or appears at risk (see Crisis Management procedure below).

The Director is supervised at an appropriate rate suggested by professional guidance by a highly specialist Consultant Psychologist.

Crisis Management Procedure

If an Associate/Employee is concerned about a particular client, and feels that they may be at risk (e.g. of self-harm), then we have a crisis management procedure.

Please refer to the section titled, ['Communication with the Service Manager/Risk & Crisis Management'](#) within the Child & Adult Protection and Safeguarding Policy.

This process can include the Associate Practitioner talking to the Service Manager/Case Supervisor/Clinical Director after each intervention session if required.

The Crisis Management procedure also includes an explicit agreement between the Associate Practitioner and Supervisor as to any communications/liaison that may be required (e.g. with the client's own GP or with local Mental Health services).

All decisions are specifically recorded for risk management purposes.

Education and training

Treasure Keepers emphasise continuing professional development (CPD). We expect all practitioners to keep up to date with therapeutic developments.

All Practitioners are trained in the Treasure Keepers model prior to engagement in any intervention work.

Confidential Client Evaluation Questionnaire

After exiting the Treasure Keepers Service, every client is asked to complete a confidential Client Evaluation Questionnaire, which addresses the clients' experience of the therapist, the therapeutic process and outcome. Questionnaires are monitored as part of the service's commitment to quality assurance.

Complaints and Compliments

Treasure Keepers have a complaints and compliments management process.

Complaints would be invited for submission to the Manager and Director of Treasure Keepers

If the complaint should be about the Director then all Service Users are advised at the point of initial contracting how they can make a complaint to the British Psychological Society and/or the Health Care Professionals Council.

Please refer to our [compliments & complaints policy](#) for further details.



TREASURE KEEPERS

RESPECT WITHIN TREASURE KEEPERS (ANTI-BULLYING & HARASSMENT) POLICY

Legislation Framework

- Equality Act 2010

Practice Guidance

- Equality Act Codes of Practice 2011
- Professional Standards of Professions
- Adoption: National Minimum Standards 2011

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Compliments and Complaints
- Conduct Management
- Internet and Computer Use
- Supervision
- Significant Incidents and Notifiable Events
- Whistleblowing

Introduction

Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee.

An Associate/Employee unlawfully harasses another individual if they engage in unwanted conduct related to a protected characteristic, and the conduct has the purpose or effect of violating the other Associate/Employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other Associate/Employee.

An Associate/Employee also unlawfully harasses another employee if they engage in unwanted conduct of a sexual nature, and the conduct has the purpose or effect of violating the other employee's dignity, or

creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.

Finally, an Associate/Employee unlawfully harasses another employee if they or a third party engage in unwanted conduct of a sexual nature or that is related to gender reassignment or sex, the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee, and because of that other employee's rejection of or submission to the conduct, they treat that other employee less favourably than they would treat them if they had not rejected, or submitted to, the conduct.

The unwanted conduct will still amount to harassment if it is based on the protected characteristic of a third party with whom the employee is associated and not on the employee's own protected characteristic, or if it was directed at someone other than the employee, or even at nobody in particular, but they witnessed it. In addition, harassment can include cases where the unwanted conduct occurs because it is perceived that an employee has a particular protected characteristic, when in fact they do not.

Conduct may be harassment whether or not the person intended to offend. Something intended as a "joke" or as "work banter" may offend another person. This is because different employees find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable to them.

Behaviour which a reasonable person would realise would be likely to offend an employee will always constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, work banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.

Reporting complaints

All allegations of harassment, bullying or intimidation will be dealt with seriously, confidentially and speedily.

The Company will not ignore or treat lightly grievances or complaints of harassment from Associate/Employees.

Any Associate/Employee is found to have harassed another employee in violation of this policy will be subject to disciplinary/Conduct Management actions under the Company's disciplinary procedure (Employees) and within their contractual agreement and [conduct management policy](#) if they are Associates.

Such behaviour may be treated as gross misconduct and could render the Associate/Employee liable to summary dismissal/termination of contract.

In addition, line managers who had knowledge that such harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.

Anyone who brings a complaint of harassment will not be victimised for having brought the complaint. However, if it is concluded that the complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against the complainant.



TREASURE KEEPERS

SAFER RECRUITMENT POLICY

Legislation Framework

- Children Act 1989
- Adoption and Children Act 2002
- Children Act 2004
- Care Standards Act 2000
- The Adoption Agencies Regulations 2005
- Safeguarding Vulnerable Groups 2006

Practice Guidance

- Adoption National Minimum Standards 2011
- Staying Safe' action plan (July 2007)

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Drug and Alcohol
- Equality, Diversity and Inclusion
- Health and Safety
- Medication
- Whistleblowing

Introduction

- ✓ Treasure Keepers value safe practice at all times and safer recruitment as part of this.
- ✓ Treasure Keepers also have policy documents on Safeguarding & Child Protection which are also relevant to this policy.

- ✓ The 'Staying Safe' action plan (July 2007) set out proposals for a safe workforce to 'promote safe recruitment practices in all sectors working with children and young people

Key Principles for Safe Recruitment

- ✓ Treasure Keepers[®] employ the following principles within safer recruitment practices. These practices are employed for both paid and volunteer staff members.
- ✓ Plan the process and decide who will be involved in each stage of the recruitment (planning, advertising, shortlisting, interview panel).
- ✓ Make sure everyone who plays a part in the process knows what they have to do and how to do it.
- ✓ Write a role description that lists what the new member of staff will be expected to do and what they will be responsible for. Make sure that all or any responsibility for contact with children is clearly stated.
- ✓ Ensure this role description lists the qualifications, knowledge, skills and abilities that a person will need to do the job.
- ✓ Make sure that criteria relating to safeguarding children are included
- ✓ Include a safeguarding statement in your advert about the job to emphasise your organisation's commitment to safeguarding children.
- ✓ Make sure all applicants fully complete a standard application form.
- ✓ Include information about your organisation's policy and procedures about safeguarding children in the information you send to people who enquire about the job
- ✓ Decide which applicants to interview on the basis of their ability to meet the criteria within the person specification and create a shortlist
- ✓ Where possible, obtain written references for all shortlisted applicants before interviewing them. In all cases, references should be obtained before entering into a contract of employment with any candidate. The references should include information about the applicants' ability to undertake the job and their motivation for doing so
- ✓ Scrutinise and compare references and ensure you have satisfactory explanations for anything that doesn't match up and any gaps in an applicant's career or personal history.
- ✓ Involve all the people who you have chosen to be on the interview panel in the process of deciding and writing the questions (including questions about applicant's attitudes to children and motives for working with children) or any other exercises as part of the interview. Questions and exercises should be designed to help the candidate demonstrate their ability to meet the person specification criteria being assessed
- ✓ Interview all applicants face to face and score their answers against your agreed selection criteria using a consistent and measurable approach.
- ✓ Confirm the identity of every candidate being interviewed and check original certificates of their qualifications if appropriate.
- ✓ Make it clear to the preferred candidate that your offer of work is subject to the satisfactory completion of all appropriate checks such as a DBS disclosure and any outstanding references.
- ✓ Complete the appropriate checks for each preferred candidate, including qualifications, status, right to work in the UK and criminal background before you allow them to start work.



TREASURE KEEPERS

SIGNIFICANT INCIDENTS/NOTIFIABLE EVENTS POLICY

Legislation Framework

- Children Act 1989
- Adoption and Children Act 2002
- Care Standards Act 2000
- The Adoption Agencies Regulations 2005

Practice Guidance

- Adoption National Minimum Standards 2014
- Fostering National Minimum Standards 2011
- Professional Practice Standards- Social Work, Practitioner psychologist, Counsellors

Linked Treasure Keeper's Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Compliments and Complaints
- Confidentiality
- Data Protection and Privacy
- Drug and Alcohol
- Equality, Diversity and Inclusion
- Internet and Computer Use
- Missing, Absence, Away, without notification.
- Whistleblowing
- Visitors

Underpinning Legislation and Guidance

The Adoption Support Agencies (England) and Adoption Agencies (Miscellaneous Amendments) Regulations 2005 Regulation 24: Notifiable Events is activated:

- Where an Employee or Associate has acted in a way that caused harm to a child or placed a child at risk of harm.
- Where a child has died or suffered serious injury whilst receiving services for adoption support.

Guidance from the National Minimum Standards (Adoption Support Agency)

- The registered provider and the manager of the Adoption support agency has a system in place to notify, within 24 hours.
- The system includes what to do where a notifiable event arises at the weekend.
- A written record is kept which includes details of the action taken, and the outcome of any action or investigation, following a notifiable event.
- The registered provider and the manager of the of the Adoption support agency has a system for notification to responsible authorities of any serious concerns about the emotional or mental health of a child, such that a mental health assessment would be requested under the Mental Health Act 1983.
- Following an incident notifiable under regulation 19 or regulation 24, the registered provider and the manager of the Adoption support agency contacts the responsible authority to discuss any further action that may need to be taken

Introduction

This policy document does not operate in isolation but forms part of a wider policy framework and associates or employees should familiarise themselves with the following policy documents included above.

If Associates or Employees are unsure about any aspect of this policy they should seek immediate assistance from Management.

In addition, associates or employees can refer directly to Standard 29 – Notification of significant events. Further advice is available in the Guidance for Adoption Support Agencies: [Tell Ofsted about an incident: children's social care notification - GOV.UK \(www.gov.uk\)](#)

Associates and Employees should also ensure that a company [Accident/Incident/Near-Miss Form](#) is also completed in line with the Health and Safety Policy

Employee/Associate Conduct & Notifications

In accordance with section 2 (1) (a) of the Protection of Children Act 1999.

- Where an Employee or Associate has acted in a manner that caused harm/placed a child a risk equating to misconduct

And this has resulted in:

- ✓ Suspension of the Employee/Associate

- ✓ Dismissal of Employee or Termination of Contract for Associate
- ✓ The identified Employee/Associate has been moved to a position not involving child care
- ✓ The Employee/Associate Leaves prior to any action being taken

If this criteria is met then there is a duty for the Manager/Designated Safeguarding Lead and/Or Director/Director/Responsible Person to report this to the Local Authority (LADO). where the organisation or Associate/Employee is registered and Ofsted.

Death or Serious Injury

Where an Employee or Associate has acted in a manner that has caused the death or serious injury of a child, the following bodies will be notified by Designated Safeguarding Lead/Manager and/or Director/Responsible Person:

- Registration Local Authority of the Organisation/Associate
- The Primary Care Trust
- The Local Health Board
- The relevant Authority (where the child is placed)
- The Secretary of State (if the child has died)
- Ofsted
- Consider RIDDOR responsibilities as defined within the [Health & Safety Policy](#)

What is a serious or significant (Notifiable) event?

The Oxford English Dictionary defines 'serious' as: 'significant or worrying because of possible danger or risk; not slight or negligible'.

The line between what is serious, and what is not, can be blurred and is always a matter of judgement. It depends on many factors, including age of the child, frequency of the incident, injuries sustained, any additional needs the child has, the context of the home and so on. In some instances, the cumulative effect of frequent incidents may make a notification appropriate even if in isolation each event would not warrant this.

What you must tell Ofsted about

If during the delivery of Treasure Keepers Services a significant/notifiable event occurs for example:

- ✓ a child being the victim or perpetrator of a serious assault
- ✓ a serious illness or accident
- ✓ a serious incident of self-harm
- ✓ serious concerns over a child's missing behaviour

Serious illness or accident would include matters such as broken bones, when a child loses consciousness or situations that require admittance to hospital for more than 24 hours.

Conversations around notifiable events/incidences should be wider than the process of notifying (or not notifying) Ofsted and should primarily focus on safeguarding practice and outcomes for children.

If a notifiable Incident Happens at the weekend:

1. Treasure Keepers Practitioners that become aware of a notifiable incident at the weekend should ensure that the child is safe (this may be through calling emergency services)
2. Follow the usual reporting procedures for the organisation as detailed above.
3. The Designated Safeguarding Lead and/Or Director/Responsible Person for the Organisation should be informed
4. The online form should be completed by the Designated Safeguarding Lead or Director/Responsible Person: [Tell Ofsted about an incident: children's social care notification - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/tell-ofsted-about-an-incident-childrens-social-care-notification)

Notifying Ofsted without delay

The online form ([Tell Ofsted about an incident: children's social care notification - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/tell-ofsted-about-an-incident-childrens-social-care-notification)) should be completed within 24 hours

Once completed this form will automatically be submitted to Ofsted.

For other incidents you can take some time to collect further information before you consider the incident serious enough for a notification.

An electronic version of the completed form is saved into the Service Manager's Safeguarding Folder and recorded onto the 'Record of Safeguarding & Notifiable Events' Excel Spreadsheet within this Folder.

Ofsted will return an email acknowledging receipt of the notification, which should also be retained for our records and attached to the notification. This email can take a couple of days.

Quality of notifications

Notifications should be evaluative and not merely a chronology of events.

Vital information, especially the action taken, is often missed from the notification.

The information needs to include:

- ✓ A brief summary of the event
- ✓ The actions taken by staff/Associates and managers at the time
- ✓ Further actions planned to reduce the likelihood of a similar incident occurring again

Registered managers are responsible for the quality of the reports completed by Staff/Associates.

Notification updates

We are not required (by regulation) to send updates to notifiable events submitted.

There may be occasions when we may be asked to send in an update following a serious incident because this would be helpful in understanding what has happened and the action we have taken.

In these situations, the inspector is likely to ask Treasure Keepers to communicate by email rather than a series of further notifications.

Updates are not required unless they refer to a significant development.

There is no legal requirement to keep notifying Ofsted as a case progresses.



TREASURE KEEPERS

SUPERVISION POLICY

Legislation Framework

- The Adoption Agencies Regulations 2005

Practice Guidance

- Adoption National Minimum Standards 2011
- Professional Practice Standards- Social Work, Practitioner Psychologist, Counsellor

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Compliments and Complaints
- Drug and Alcohol
- Equality, Diversity and Inclusion
- Quality Assurance
- Significant Incidents and Notifiable Events
- Trauma Exposure
- Whistleblowing

Definition

Fitness of workers defined in Regulation 19, Adoption Support Agencies (England) & Adoption Agencies (Miscellaneous Amendments) Regulations, 2005

The registered person shall not

- (a) employ a person to work for the purposes of the agency unless that person is fit to work for the purposes of the agency;*
- (b) allow a person who is employed by a person other than the registered provider to work for the purposes of the agency unless that person is fit to work for the purposes of the agency.*

For the purposes of paragraph (1), a person is not fit to work for the purposes of an agency unless—

- (a) he is of integrity and good character;*
- (b) he has the qualifications, skills and experience necessary for the work he is to perform;*
- (c) he is physically and mentally fit for the work he is to perform; and*
- (d) full and satisfactory information is available in relation to him in respect of each of the matters specified in Schedule 2.*

Social care common inspection framework (SCCIF): adoption support agencies (November, 2019)

This guidance highlights:

- *Managers and staff [and Associates] receive regular and effective supervision that is focused on children and other service users' experiences, needs, plans and feedback.*
- *Supervision is recorded effectively.*
- *There is effective support and challenge, including through team and management meetings, to ensure that the professional development of staff and leaders results in the right environment for good practice to thrive.*
- *The emotional impact on staff of the work is recognised and managed well by leaders and managers.*

Introduction

As a service it is a core value to foster a sense of Team working and connection.

It is not easy to support the population who are affected by developmental trauma and it is imperative that the professionals working alongside these individuals feel well supported.

The Associates have a monthly supervision session but are aware that they can access myself as the Service/Clinical Director and the Manager at any time if they need additional support. They are frequently reminded that the process to access this is to send a message and then an additional time will be made for them during that day.

A written record is kept by the Treasure Keepers detailing the time and date and length of each supervision held for each Practitioner including the registered person.

The record is signed by the supervisor and the Practitioner at the end of the supervision.

All Employees & Associates have their performance reviewed at least annually and, where they are working with children, this appraisal takes into account the views of the children the Practitioner works with.

All Employees & Associates have a wellbeing check as part of supervision sessions. This encourages personal and professional reflection on the impact of the role.

The Manager and Director also attend monthly supervision sessions with an external supervisor.

Supervision records feed into quality assurance procedures for Treasure Keepers.

Aims of the Supervision Policy

- ✓ To foster a culture of mutual support, if our Team feel well supported the hope is that our target population of young people, parents & carers and professionals dealing with developmental trauma will also feel supported.

- ✓ To ensure there is regular and responsive access to case management supervision
- ✓ To support all practitioners in developing their clinical skills.
- ✓ Review fitness to practice and Practitioner Wellbeing
- ✓ To review quality and standards of practice.
- ✓ Adherence to Treasure Keepers Code of Conduct

Supervision Requirements

- All Practitioners within Treasure Keepers are offered monthly case management/clinical supervision with the Clinical & Service Director. This is for a minimum of 1 hours per month
- Practitioners are also asked to attend a management supervision session with the Treasure Keepers every 4-6 weeks.
- All Associate Practitioners are additionally asked to source their own regular clinical supervision
- The British Psychological Society suggests that all psychologists engaged in therapeutic work should access a minimum of 1.5 hours of clinical supervision per month.



TREASURE KEEPERS

TRAUMA EXPOSURE POLICY

Legislation Framework

- Health and Safety Act 1989
- Adoption Support Agencies (England) & Adoption Agencies (Miscellaneous Amendments) Regulations, 2005

Practice Guidance

- Adoption National Minimum Standards 2011
- Professional Practice Standards- Social Work, Practitioner Psychologist, Counsellor
- Taking trauma related work home: Advice for reducing the likelihood of secondary trauma | BRE33d | 09.06.2020

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Compliments and Complaints
- Covid-19
- Drug and Alcohol
- Equality, Diversity and Inclusion
- Quality Assurance
- Supervision
- Whistleblowing

Introduction

Exposure to distressing material – such as traumatising conversations, images and written or auditory testimony – occurs in the work of many people.

This is especially prevalent within Treasure Keepers[®] as we support children and families/Placements experiencing developmental trauma.

The Covid-19 pandemic has resulted in this type of work being undertaken in the home. In these circumstances, there is an increased risk of secondary trauma and compassion fatigue when the support of Associates is less available and the boundary between work and home life eroded.

This guidance document recommends a step-by-step approach for organisations whose employees are at risk of vicarious trauma while working from home during the Covid-19 Pandemic.

This is based on the following 5 Rs:

1. Recognise
2. Review
3. Respond
4. Refresh
5. Respect

Using the 5 Rs will help The Company to fulfil their duty of care, enabling them to recognise, review and respond to risks for individual employees, make changes or improvements, and ensure that respect underpins their response.

Recognise

When asking trauma exposed professionals to work from home, The Company should consider their responsibility for the wellbeing of their employees and Associates for the vicarious injuries which may be sustained by them and by their partners and children, and others in the home.

Individuals whose work involves engaging with victims and offenders of crime, or protecting adults and children, are examples of activities in which employees may be exposed to trauma.

Key considerations:

- Employees performing trauma exposed work may experience psychological harm including anxiety, depression, compassion fatigue and simple or complex Post Traumatic Stress Disorder as defined by the World Health Organisation.
- Employees in these types of roles need to be empathetic, but empathy can increase the risk of secondary trauma for the professional.
- Peer support and social bonding in teams increases resilience and reduces the likelihood of personal injury but may be less available while homeworking.
- In trauma-engaging roles maintaining the boundary between the trauma and personal life is essential for wellbeing.
- Taking traumatising materials into the home may harm families and children who can be exposed to the nature of the work or to the emotional discharge of distress or anger by their work-distressed parent or partner.

Review

Carry out a full review before deciding whether a professional should work with trauma while homeworking.

A role risk assessment to understand the challenges and identify particularly harmful elements is necessary when allocating work.

Individual assessments should cover practical risk areas including:

- other people in the home
- location
- privacy and set up of the workstation
- digital security provisions

The following should also be reviewed when considering arrangements for homeworking:

- How to monitor the homeworker's trauma symptom levels (e.g. through use of psychological surveillance, via use of an Occupational Health professional, as set out by the UK Health and Safety Executive).
- Availability of psychological or peer supervision and support for the homeworker.

Respond

Address any gaps identified during the review stage. This may involve updating policies, procedures and equipment, and altering how work is structured and allocated to the employee who is working at home.

Key considerations:

- ✓ Emphasis should be on those working from home where there are children and/or a lack of a secure working area. Taking trauma related work home: Advice for reducing the likelihood of secondary trauma
- ✓ When allocating work, ensure that tasks with the greatest propensity to cause harm are carried out in the traditional workplace rather than at home.
- ✓ Break up or segment tasks to encourage flexibility and/or a team approach. These changes are not without difficulties as there may be times when handling traumatising materials at home is unavoidable. Task allocation to protect homeworkers may result in an intensified level of traumatic exposure in the main workplace. Given increased levels of risk, The Company have a statutory duty of care to undertake regular, ongoing personal and workplace risk assessments and psychological surveillance.
- ✓ Noticing early warning signs means that steps can be taken to prevent problems from developing further.
- ✓ Professionals will need:
- ✓ Appropriate training and tools for recognising signs of stress, compassion fatigue and trauma.
- ✓ Systems to monitor the demands, levels of control, availability of support, quality of relationships and impact of changes on individual employees and team members. Remote monitoring is not easy but could be part of a programme of regular individual or team consultative support. This will allow recognition of and response to personal and emotional demands. Where individuals are showing signs of more serious psychological conditions there needs to be a readily available process for self-referral or management referral for a psychological assessment via occupational health or other clinical routes.

Refresh

An unprecedented level of change in working practices continues to occur because of the Covid-19 pandemic. Monitoring and ongoing review are necessary so that these changes can be managed effectively, and steps taken to 'refresh' by making improvements in light of the evidence gathered.

This requires:

- Agreement on the key indicators of success, for both the wellbeing of the workers and the health and productivity of the organisation in responding to the needs of the victims of trauma and/or identifying the offenders and sources of trauma.
- The full engagement of management, supervisors, and frontline workers in systematically providing evidence of what works and what could be improved. As lockdown eases and the pandemic is brought under control, organisations will need to adapt to become more agile and develop organic ways of working. Leaders will provide direction and enable action in support of this, with teams being accountable and organisations becoming more flexible.

Respect

The need for respect underpins any response to support employees dealing with traumatising material in their homes and workplaces.

This involves actively listening to and understanding the circumstances and wishes of individuals, including:

- ✓ Special needs of vulnerable groups such as those with disabilities including mental health problems or going through demanding personal times including illness, relationship breakdown, bereavement, or pregnancy.
- ✓ The effects of bereavement.
- ✓ Caring responsibilities.
- ✓ Financial constraints. The Company and Associates can show respect through compassion and awareness of the needs of others. People have their own ways of dealing with change and both time and encouragement will help everyone to adapt.

Conclusion

Organisations, managers, and supervisors should encourage shared learning, enabling everyone to participate in the creation of a work environment where diversity is valued, workers are engaged, and organisations are trauma informed.

GUIDANCE TAKEN FROM:

Taking trauma related work home: Advice for reducing the likelihood of secondary trauma | BRE33d | 09.06.2020



TREASURE KEEPERS

VISITORS POLICY

Legislation Framework

- Children Act 1989
- Adoption and Children Act 2002
- Children Act 2004
- Care Standards Act 2000
- The Adoption Agencies Regulations 2005
- Safeguarding Vulnerable Groups 2006

Practice Guidance

- Adoption National Minimum Standards 2011

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Data Protection and Privacy
- Drug and Alcohol
- Equality, Diversity and Inclusion
- Health and Safety
- Internet and Computer Use
- Medication
- Out of Hours
- Significant Incidents and Notifiable Events

Introduction

Treasure Keepers will take all reasonable steps to prevent unauthorised persons entering the premises.

There is an agreed procedure for checking the identity of visitors

Procedures Applicable to Visitors

The following rules apply for all kinds of visitors:

- ✓ Visitors should sign in and show some form of identification when identity is not previously known to the Treasure Keepers Employees/Associates
- ✓ Identity verification may not be required for regular Service Users).
- ✓ Visitors will receive passes and return them once the visit is over.
- ✓ Employees/Associates must always tend to their visitors while they are inside our premises.
- ✓ Visitors are not permitted to admit any other persons into the premises.
- ✓ Visitors must not misuse the internet connection, disclose confidential information or take photographs on the premises.
- ✓ This is a no smoking and zero drugs tolerance premises.
- ✓ In the event of a fire or emergency Visitors must exit the premises immediately via the nearest safe exit. Visitors must not re-enter the building unless advised it is safe to do so.
- ✓ All Accidents/Incidents/Near-Misses must be reported immediately
- ✓ Parking is available in the surrounding area. Vehicles should not cause an obstruction and are left at the owner's risk.
- ✓ If visitors do not conform, they may be escorted out or face prosecution if appropriate.
- ✓ Visitors are allowed during working hours. After-hours visitors must take place with permission from Senior Leaders (Manager/Director)



TREASURE KEEPERS

WHISTLEBLOWING POLICY

Legislation Framework

- Children Act 1989
- The Public Interest Disclosure Act 1998.
- Adoption and Children Act 2002
- Children Act 2004
- Care Standards Act 2000
- The Adoption Agencies Regulations 2005
- Safeguarding Vulnerable Groups Act 2006

Practice Guidance

- Adoption National Minimum Standards 2011
- WHISTLEBLOWING Guidance for Employers and Code of Practice MARCH 2015

Linked Treasure Keepers Policies

- Child and Adult Safeguarding and Protection
- Conduct Management
- Compliments and Complaints
- Confidentiality
- Covid-19
- Data Protection and Privacy
- Drug and Alcohol
- Equality, Diversity and Inclusion
- Health and Safety
- Medication

Definition

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Company is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

Qualifying disclosures

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure” by:

- committing a criminal offence
- failing to comply with a legal obligation
- a miscarriage of justice
- endangering the health and safety of an individual
- environmental damage or
- concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen.

The Company will take any concerns raised relating to the above matters very seriously.

Employees/Associates must reasonably believe that the disclosure is “in the public interest”. We encourage you to use the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the Company’s grievance policy.

Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e it relates to a personal grievance or a child protection or safeguarding disclosure, the receiving manager will confirm that the matter will be addressed under the grievance policy or the safeguarding policy, as applicable.

Should you have concerns relating to child protection or safeguarding relating to a Director, Manager, Employee, Associate, Sub-Contractor or Contractor of the Company, for example, one of the above has:

- Carried out behaviour which has harmed or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Carried out behaviour that may suggest they are unsuitable to work with children

You should raise these under the safeguarding policies and procedure, specifically section “[Allegations of child abuse involving Treasure Keepers® Associates or Employees](#)”.

If a child is in imminent danger, you should contact the police immediately.

If you are unable to raise a disclosure directly with the Company, you should report your whistleblowing disclosures to:

The Children’s Commissioner by email to: help.team@childrenscommissioner.gov.uk

or by post to: The Children’s Commissioner’s Office Sanctuary Buildings, Great Smith Street, London SW1P 3BT

or by phone: 0207 783 8330

find out more at their website: www.childrenscommissioner.gov.uk

The procedure for the handling of Whistleblowing Disclosures

In the first instance you should report any concerns you may have to the Director or Jo Groom where the concern relates to the Director or it is not appropriate to make the report to the Director.

All concerns reported will be treated in the utmost confidence. You will be asked to confirm any verbal concerns in writing via letter or email to confirm a written record of a verbal report.

If you do not report your concerns to either of the above, then you should take them direct to the appropriate organisation or regulatory body with authority for that area.

Following receipt of a disclosure made under this policy, an investigation meeting will be held with the employee. The purpose of this meeting is to gather as much information as possible from the employee regarding their concerns, including whether they have any supporting evidence or can identify any witnesses. This meeting will be held within a fair and reasonable timeframe, following receipt of the disclosure.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements. This investigation must be completed within a fair and reasonable timeframe following receipt of the disclosure. If this is not possible, the investigating manager will speak to the employee in advance of the completion deadline to agree an extended period of investigation.

Once the investigation is complete, the investigation manager will write to the employee confirming the outcome.

If the employee/Associate is not satisfied with the explanation or outcome, they may raise the matter with the appropriate official organisation or regulatory body. Alternatively, Employees or Associates may raise a formal complaint under the Company's Complaints/Grievance policy.

Formal action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy.

Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

Protection against detrimental treatment

All employees/Associates who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.