

Report of: Pembrokeshire Coast National Park Authority Safeguarding Lead

Subject: Revised Pembrokeshire Coast National Park Authority Safeguarding Statement

Decision Required:

Recommendation:

The Authority is recommended to:

- a. Review and agree the contents of the revised statement.

1. Key Messages

- 1.1 Following the presentation of a revised version of the Safeguarding Statement for Pembrokeshire Coast National Park Authority to the December 2024 NPA, members requested a series of amendments and additions. These have been included in the revised version accompanying this report.

2. Background

- 2.1 The amendments made to the Safeguarding Statement from the version presented to the previous NPA include:
 - Changes to Section 3.0 - Scope of the Policy
 - In Section 6.3 clarification regarding DBS checks and process for identifying the level of check required
 - Additional information included in the statement to provide clarity regarding 'one to one' working with children and vulnerable adults (in 7.2)
 - Reference to a 'lost children procedure' in 7.10

3. Consultation

- 3.1 The statement has been reviewed by the Authority's Safeguarding group whose members are:
 - Graham Peake (Safeguarding Lead)
 - Libby Taylor
 - Tegryn Jones
 - Joy Arkley

4. Strategic Policy Context

- 4.1 The information and recommendation(s) contained in this report are consistent with the Authority's statutory purposes and its approved strategic policy context.
- 4.2 An effective Safeguarding Policy enables engagement at numerous levels with the most vulnerable in our communities and so in practice contributes to multiple objectives including the delivery of National Park Management Partnership Themes and Authority Well-being Objectives.

5. Financial Considerations

- a. Current cost to the Authority is largely limited to the staff time required to oversee the delivery of its safeguarding work (as outlined in the statement), this includes an internal working group which has oversight of our work in this area and the management and implementation of the DBS checking process which is overseen by the HR team.

6. Risk and Compliance Considerations

- a. There are significant risks attached to not having a robust statement, policy, management and oversight of Safeguarding across the Authority's work areas.

7. Impact on our Public Sector Duties

7.1 Integrated Assessment Completed: No

7.2 Equality, Socio-Economic, Health and Human Rights Impacts

- 7.2.1 The statement and guidance contribute to the wider themes of equality and the Authority's work in this area.

7.3 Welsh Language Impacts

- 7.3.1 The Authority's Safeguarding statement and guidance will be presented bilingually.

7.4 Section 6 Biodiversity Duty and Carbon Emission Impacts

- 7.4.1 Not applicable

7.5 Well-being Goals for Wales and 5 Ways of Working (Sustainable Development Principles) Impacts

- 7.5.1 The effective delivery of our Safeguarding responsibilities contributes to the Wellbeing Goals for Wales as identified below

Well-being Goals for Wales

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

8. Conclusion

8.1 Review and agree the contents of the revised statement.

(For further information please contact Graham Peake (Safeguarding Lead & Learning and Inclusion Team Leader), email address:

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Pembrokeshire Coast National Park Authority

POL_S1 Safeguarding Policy

Version	Active Date	Document Owner	Internal/ External
3	TBA	Head of Engagement and Inclusion	Internal

Please note: Policy Control Sheet is at the end of the document. Policy document is uncontrolled once printed. Please refer to the Authority's Intranet site for up-to-date policy.

Does this Policy relate to me:

- This policy applies to all Pembrokeshire Coast National Park Authority Members, staff and volunteers, but especially to those employees whose duties and roles bring them into regular contact with children, young people and vulnerable adults.

Quick Reference - Key Policy Messages:

- All Staff, Members and volunteers have responsibilities in terms of safeguarding and should have an awareness of the issues which may lead to children, young people and vulnerable adults being harmed.
- The Authority has in place employment processes to support safeguarding across recruitment and selection, DBS checks, induction, training and support.
- There are safe working practices staff need to follow to support safeguarding.
- This policy sets out what to do if you suspect abuse or mistreatment.
- The Authority has processes in place for making and dealing with allegations of abuse against staff and volunteers.
- Contact Information for the Authority's Safeguarding Leads.

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The Learning and Inclusion Team Leader [Graham Peake] is the safeguarding lead for the Authority and is the first point of contact for incidents and issues.

In the absence of the Learning and Inclusion Team Leader, contact with the Head of Engagement and Inclusion [Libby Taylor], or the Chief Executive [Tegryn Jones].

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1. Policy Statement

- 1.1 Pembrokeshire Coast National Park Authority (The Authority) works with a wide range of audiences which include children¹, young people and vulnerable adults². The Authority employs staff and works with volunteers whose roles involve work with these groups.
- 1.2 Children, young people and vulnerable adults are particularly defenceless to abuse or mistreatment. Abusers are often in positions of trust or power (most often, the abuser is known to the child, rather than a stranger). Vulnerable people do not expect adults to harm them and they can often be easily persuaded that there is nothing wrong and that they should not tell. Abuse can be physical, emotional/psychological, sexual, financial or neglect.³
- 1.3 The Authority wants children, young people and vulnerable adults to enjoy their involvement with us, and to inform and enthuse them about the National Park and what we do. Their lives can be enriched by participating in a variety of activities: they learn and have a good time. The Authority will take all reasonable steps to ensure that they do this safely. They have the right to be protected from harm.

2. Aim of Policy

- 2.1 This policy aims to ensure that sound working practices are in place that put safeguarding as a priority and which are effective in managing risk for these vulnerable groups, but which will also protect staff and volunteers against wrongful or malicious allegations. To achieve this the Authority will:
 - Ensure that Members, staff and volunteers have an awareness of the issues which may lead to children, young people and vulnerable adults being harmed.
 - Ensure careful recruitment, selection and management procedures. These procedures will include regular support to, and supervision of, staff and volunteers.
 - Ensure during recruitment that at least one member of the interview selection panel has completed “Safer Recruitment” training.
 - Keep safeguarding policies under regular review.
 - Have safeguarding guidelines, and communicate them to staff, volunteers and Members in appropriate ways.
 - Ensure that all staff and volunteers are following good and safe working practices.

¹ Children are defined as “persons aged under 18”.

² Vulnerable adults are defined as “persons aged 18 or over who has a “substantial learning or physical disability; a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs or a significant reduction in physical or mental capacity”. (Department of Health 2002)

³ The NSPCC [Types of Child Abuse & How to Prevent Them | NSPCC](#) provides a comprehensive list of behaviour that is categorised as abuse.

- Have procedures in place relating specifically to transport, work placements, use of photography, residential visits and E-safety.
- Be involved in training made available through various agencies and strengthen links with these agencies.
- Foster a culture of openness, which encourages individuals to share concerns or suspicions.
- Ensure that there is an effective process for managing complaints, grievances and disciplinary procedures.

2.2 This document provides guidance for Members, staff and volunteers who may suspect that a child or vulnerable adult they have contact with is being abused or mistreated.

2.3 The document sets out the process for what will happen if there is an allegation involving Members, staff, volunteers or participants in our activities.

3. Scope of Policy

3.1 This policy applies to all Pembrokeshire Coast National Park Authority Members, staff and volunteers, together with the sites and premises owned by PCNPA and any activity delivered through or with the Authority's involvement.

4. Your Responsibilities

4.1 All individuals in contact with or working with children, young people, vulnerable adults and their families; or with adults who may pose a risk to children; or who are responsible for arranging services for children and/or adults, should:⁴

- Understand their role and responsibilities to safeguard and promote the welfare of children, young people and vulnerable adults.
- Know and follow their organisation's procedures and protocols for safeguarding and promoting the welfare of children, young people and vulnerable adults and know who to contact in their organisation to express concerns about an individual's welfare.
- Be alert to indicators of abuse and neglect.
- Have received safeguarding training to a level commensurate with their role and responsibilities.
- Know when and how to refer any concerns about a child, young person or vulnerable adult.

4.2 As part of the Authority's procedures for safeguarding and promoting the welfare of children, young people and vulnerable adults it may be necessary to carry out a check on an individual. These checks are part of the Disclosure and Barring Service ([Disclosure and Barring Service - GOV.UK \(www.gov.uk\)](http://www.gov.uk)).

⁴ All Wales Safeguarding Procedures [Safeguarding Wales](http://www.gov.uk)

- 4.3 A Disclosure and Barring Service check provides information about an individual's criminal record. It can only be undertaken with the agreement of the individual, and the certificate issued is sent only to the individual and not the Authority.
- 4.4 There are clear guidelines about what roles are eligible for a check, and in most cases no check will be required.
- 4.5 **A check can only be made for the purposes of safeguarding children, young people or vulnerable adults.**

5. About abuse

5.1 A child or vulnerable adult is abused or neglected when somebody inflicts harm or fails to act to prevent harm. Victims may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. The type of abuse is generally classified under the following headings:⁵

5.2 Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or vulnerable adult. Physical harm may also be caused when a parent or caregiver fabricates or induces illness in a child/vulnerable person whom they are looking after.

5.3 Domestic Violence or abuse

This is typically an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is, or has been, an intimate partner or family member.

5.4 Emotional/psychological abuse

Emotional/ psychological abuse is the persistent emotional ill treatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to a child or vulnerable adult that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on an individual. It may involve causing victims frequently to feel frightened or in danger, for example by witnessing domestic abuse within the home or being bullied, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child or vulnerable adult, though it may occur

⁵ Wales Safeguarding Procedures [Safeguarding Wales](#)

alone.

5.5 Sexual abuse

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the victim is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children or vulnerable adults to behave in sexually inappropriate ways.

5.6 Financial abuse

Financial or material abuse is any theft or misuse of a person's money, property or resources by a person in a position of, or expectation of, trust to a vulnerable person or child.

5.7 Modern Slavery

Individuals being forced into a life of slavery, human trafficking, domestic servitude or forced labour.

5.8 Neglect/self-neglect

Neglect is the persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of the child or vulnerable adult's health or development. It may involve a parent or caregiver failing to provide adequate food, shelter and clothing, failing to protect from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, an individual's basic emotional needs.

In addition, neglect may occur during pregnancy as a result of maternal substance misuse.

Self-neglect is when an individual is unable to meet their own basic needs such as nutrition or hygiene.

5.9 Discriminatory abuse

Individuals being treated differently due to personal traits such as age, gender, race, sexual orientation etc.

5.10 Organisational or institutional abuse

When an organisation's needs are put above an individual's needs, for example, telling an individual that they have to go to bed at a certain time.

6. Employment Processes

6.1 Recruitment and Selection:

Careful recruitment and selection of staff reduces the opportunity for people who present a risk of harm to children, young people or vulnerable adults from using a post with the Authority to access potential victims.

Careful recruitment will include applicants, including volunteers;

1. Completing an application form
2. Providing two references as appropriate to the role
3. Having an interview
4. Having a DBS check where eligible

An application form must be completed by anyone applying for employment within the Authority. It may also apply to volunteers where the role applied for involves working with children, young people and vulnerable adults. See the Authority's Volunteering Handbook for more information. The application form must include a full employment history.

Two referees must be supplied as part of the application process. Where the post holder may be in regular contact with children, young people or vulnerable adults the Authority will try to ensure that at least one of these referees can provide information about the applicant's experiences working or volunteering with children, young people and/or vulnerable adults.

At the interview, at least one member of the selection panel will have specialist understanding of effective recruitment within this safeguarding policy. This staff member must have completed "Safer Recruitment" Training.

A Disclosure and Barring Check will take place if the role applied for fulfils the criteria for such checks as shown in Appendix 1. This includes, where appropriate, a check for criminal records, in line with the Disclosure and Barring Service (DBS) processes and code of practice.⁶

However, a police check will not necessarily reveal an offender, as not all people who abuse children are known to the police. Therefore, the recruitment and selection procedures must be followed and must be robust.

The Authority is committed to equality of opportunity and therefore having a criminal record will not necessarily bar someone from working with us. An objective assessment of risk will be undertaken by the relevant Team Leader, the Safeguarding Lead and the Head of People Services (refer to the Authority's Recruitment Policy for more detail).

⁶ Guidance taken from the WCVA Criminal Records Unit and Safeguarding Service, January 2014 and from the Disclosure and Barring Service ([DBS eligibility guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk))

Further information on DBS checks, DBS procedure and employing someone with a criminal record is set out in the Authority's Recruitment Policy.

6.2 DBS Checks and the roles of staff and volunteers

All roles (both voluntary and paid) should be assessed at the time of recruitment to identify the need for a DBS check and at what level this should be requested. DBS checks can be undertaken at 3 levels:

- Basic
- Standard
- Enhanced.

Enhanced level checks can also be requested to include barring list checks. For further information see: [DBS checks: detailed guidance - GOV.UK](#)

The Safeguarding Lead or Safeguarding Deputy at the Authority will be able to provide additional guidance in relation to the level of check required. However, all members of the workforce who come in to contact with children and/or vulnerable adults on a regular basis are likely to require an Enhanced DBS check. For those whose work is likely to include 'in loco parentis' activity, including residentials and placements or, where prolonged 'one to one' contact cannot be avoided (see Sections 7.9 and 9.0) an Enhanced DBS check with a check on barred lists is required.

See Appendix 1 for schedule on roles of staff/ volunteers in relation to safeguarding and DBS Checks

6.3 Update service

The Authority aims to register appropriate staff and volunteers with the DBS Update Service where possible at the time of recruitment. This provides an instant online method that checks an individual's status. The service is updated weekly to show any changes to an individual's criminal convictions and barring service. The costs of joining the service will be met by the Authority.

Update Service Status Checks will confirm that the current certificate held by a member of staff or volunteer;

- Did not reveal any information and remains current.
- Remains the same. No new information has been identified, and the certificate remains current.
- Is no longer current. Information has changed and a new certificate should be applied for that is up to date.

6.4 Renewing Checks⁷

There is no legal requirement for the Authority to carry out periodic Disclosure and Barring Checks (DBS). However, in line with other public bodies, PCNPA will renew existing checks for staff and volunteers every three years. If deemed necessary, the Authority can ask staff and volunteers permission to apply for a new check at any other time.

The decision to apply for a new check should be made by the Safeguarding Lead and Team Leader responsible for an individual staff member or volunteer, in consultation with the Head of People Services and with reference to the job or task description for that individual. The decision to check should be reviewed if an individual's role or circumstances are believed to have changed and should be proportionate to risks.

Where a new certificate is needed the Authority must seek the permission of the individual before an application to the DBS is made.

New certificates will only be sent to the staff member or volunteer. The Authority requires the individual to present the new certificate to the Head of People Services within a required timeframe.

6.5 Induction, Training and Support

Induction

Line Managers will ensure that formal induction processes are followed for new staff and volunteers, to include guidance relating to children, young people and vulnerable adults. Seasonal staff must be re-briefed at the start of each season.⁸ If further training needs are identified, these should be followed up.

Training⁹

All staff that work with, or who manage staff who work with, vulnerable groups will undergo the ELMS module **Safeguarding and Child Protection for Non-Children's Service Workers** or an equivalent Group A Safeguarding training module.¹⁰ Line Manager should ensure staff have undertaken training, and report training status of employees to HR for it to be recorded on Cezanne HR system against the employee. Staff are expected to complete the training every three years.

⁷ Disclosure Barring Service October 2013, Updated January 2014

⁸ Re-briefing for all seasonal staff is included in Pre-Season briefing.

⁹ Safeguarding Training is now linked to the Social Care Wales, National Safeguarding Standards. ([National safeguarding training, learning and... | Social Care Wales](#))

¹⁰ Safeguarding training is available through the National Park's on-line learning platform ELMS and is also available through Social Care Wales ([Group A Safeguarding | Social Care Wales](#))

The Safeguarding Lead (Learning and Inclusion Team Leader) and Head of Engagement and Inclusion should undergo appropriate child protection/adult protection training suitable for Group C practitioners/workforce.

All team leaders should undergo Safer Recruitment training either through the online ELMS module 'Safer Recruitment' or as part of in-person Safer Recruitment training provided by the Authority. During recruitment at least one member of the interview selection panel must have completed "Safer Recruitment" training.

General briefings for all the Authority's managers, including Committee Members will be held as necessary.

All Members and relevant staff must be made aware of this policy and guidance and of the procedures for dealing with safeguarding incidents.

Support and Monitoring

Line Managers should provide ongoing support to staff and volunteers; safeguarding should be kept as a visible, priority issue and included in staff appraisals and other 1 to 1 meetings and team meetings etc

Staff and volunteers working directly with children, young people and vulnerable adults are part of a regular monitoring programme where staff are 'assessed' in the field, measuring various elements of the work, including safeguarding measures and health and safety.

7. Working Safely

7.1 The Authority implements safeguarding across all activities by

- Ensuring that all activities involving children, young people and vulnerable adults are subject to the appropriate risk assessment which aims to manage risk of all kinds. Risk assessment will be in line with current Authority guidance and health and safety policy and will be carried out by people with a good understanding of safeguarding issues appropriate to the activity and/or setting. This should ensure that staff and volunteers feel confident in their work and to have an opportunity to share any concerns about child protection or adults at risk.
- Providing adequate training and supervision in order to manage the risk to children, young people and vulnerable adults.
- Ensuring that Team Leaders have a good understanding of safeguarding issues and ensure that job procedures within their services take account of this policy and include processes for dealing with relevant incidents.

Many staff will not, in their day-to-day roles, work with children, young people and vulnerable adults. Even so, there may be occasions where their duties do bring them into contact with these groups, albeit briefly, such as working with work experience placements or through support services.

The following sections on first aid, transport, photography, data management and E-Safety therefore apply to all staff and volunteers working for the Authority.

7.2 Guidance on First Aid

Generally, first aid treatment should be carried out by the staff from the organisation with which the Authority is working, eg, a class teacher. However, there are occasions when an Authority staff member or volunteer may be called upon to assist with or to give first aid treatment. This may be because the Authority's staff or volunteers are directly responsible for the group, the organisation's staff need to manage the rest of the group or because of the severity of the injury more than one first aider needs to be involved. When giving first aid treatment staff and volunteers should use the following guidance.

- Try not to give first aid alone. Where possible have another member of staff with you.
- Consider where treatment is taking place. Think about your safety, but also about the patient. They may be embarrassed or distressed by what has happened.
- If an injury requires treatment where possible ask the patient to administer their own treatment, under your guidance. This will depend on the age and understanding of the patient, and also on the severity of the injury and potential distress of the patient.
- Consider where the injury is that you need to treat. Explain to the patient exactly what you are going to do, and make sure that they understand and agree.
- A record should be made via the Authority's incident reporting process as soon as possible after the event, but not later than 24 hours, recording the details of the incident, any resulting injuries, and any treatment given or advised. It should also be noted if treatment is declined.

7.2 Guidance on transporting children, young people and vulnerable adults¹¹

While in most instances there will be no need for Authority staff to transport children, young people and vulnerable adults in their own or Authority vehicles, there are occasions when such a need occurs. When that happens, the following guidance should be followed:

- Journeys should be agreed between the Authority staff member and their line manager, and should be with the consent of the organisation, school or parent/guardian of the person being transported.
- The reason for the journey, and length of journey should be clear.

¹¹ Transporting Children and Young People Safely (use of staff/volunteer vehicles) Warwickshire County Council

- It is the responsibility of the driver to have the correct documentation (current MOT certificate, insurance, driving licence) to prove that the vehicle is roadworthy.
- Vehicles must have the correct restraints, appropriate to the age and size of the passenger.
- The child, young person or vulnerable adult must not be left unattended in the vehicle.
- Ideally, journeys should not be made without an additional adult in the vehicle. This significantly reduces the risk of distraction, accident and injury and allegation of misconduct or abuse. If this is not practically possible, a risk assessment must be undertaken and measures put in place to ensure that the risks are reduced to the lowest level. Where 'one to one' journeys are unavoidable, the organisation responsible for the placement should be informed and must (where appropriate) communicate this to parents/carers. Drivers who are responsible for unaccompanied children, young people and vulnerable adults should be subject to an Enhanced DBS check alongside other control measures included in the Risk Assessment.

7.4 Guidance on the taking of photographs or film for work purposes¹²

Photographs of children, young people and vulnerable adults help staff to demonstrate the breadth of their work and are used for publicity purposes when promoting the work of the Authority.

- Photographs should only be taken with the consent of the organisation, school or parent/guardian, and the purpose for which the pictures have been taken is understood. A consent form for taking photographs is available from the Authority.
- Photographs should only be taken to demonstrate work in which the children, young people and vulnerable adults are involved or have completed. They should focus on the activity, and not on individuals. Care should be taken that all participants are appropriately dressed.
- Care should be taken when supplying information with photographs. Do not supply full names or other personal information.
- Do not use images of children or young people who are considered vulnerable, or whose identity may require protection.
- Images should be carefully stored, with consent attached or cross referenced.
- Images should only be passed to third parties for their use where this has been agreed as part of the consent process.

The Child Trafficking and Pornography Acts 1998/2004 contain specific provisions on the exploitation of children. Photographs or recorded visual material where children and young adults are identifiable are regarded as

¹² Using photographs of children for publication (NSPCC) Information and Advice: Taking Photographs in Schools (Information Commissioners Office)

personal data under the Data Protection Act 2018 / UK GDPR and their creation, storage and use must comply with the requirements of this Act Please see Section 7.5 - Data Management and Safeguarding.

7.5 Data Management and Safeguarding

The Authority's staff and volunteers need to ensure when handling sensitive personal data that they comply with the Data Protection Act 2018/ UK GDPR.¹³ Personal data is defined as data relating to a living individual who can be identified from the data or from the data in conjunction with other information in the possession of the data controller. It must be obtained fairly, accurately, kept up to date and should be kept and used only for one or more specified lawful purpose. The Authority must have a valid lawful basis in order to process personal data.

Children, vulnerable adults and data protection

Under the Data Protection Act children and adults at risk are identified as "vulnerable individuals" and deserving of "specific protection". Where the personal details of children and adults at risk are collected the nature of the records should be included on the Authority's records of processing with the relevant legal basis for processing listed.

Privacy notices for children and vulnerable adults should be in place so that they are able to understand what will happen to their personal data, and what rights they have. Privacy notices should be clear, and written in plain, age-appropriate language.

Children and adults at risk have the same rights as others over their personal data. These include the rights to access their personal data; to request rectification; object to processing and to ask that their personal data is erased.

Sharing Information and Safeguarding

Whenever possible, consent should be obtained before sharing personal information with third parties. However, in some circumstances, consent may not be possible or appropriate as the safety and welfare of a child or vulnerable person may dictate that the information must be shared.

One of the exceptional circumstances is in order to prevent abuse or serious harm to others. The most important consideration is whether sharing information is likely to safeguard and protect a child or vulnerable adult.

¹³ Information Commissioner's Office, Guide to the General Data Protection Regulation (GDPR), Children: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/applications/children/>

You should seek advice from the National Park Authority's Safeguarding Lead (details can be found at the end of this policy document) before sharing information in the circumstances indicated above.

7.6 E-Safety¹⁴

E-Safety encompasses not only Internet technologies but also electronic communications via mobile phones, games consoles, wireless technology and all forms of on-line social media. It highlights the need to educate children and young people about the benefits, risks and responsibilities of using information technology. E-Safety concerns safeguarding children and young people in the digital world and supporting them to develop safer online behaviours both in and out of school. Authority staff should.

- Work within the boundaries of professional behaviour.
- Should not use NPA equipment for inappropriate reasons and be guided by the Authority's ICT and associated policy.
- Be aware of safety concerns when preparing and include this in the risk assessment process.
- Where appropriate, communicate with organisations, schools and parents about the purpose of e-communications.
- Should avoid exposing children and young adults to inappropriate and harmful material, or harmful interaction with other users.

Remember: Emails, tweets, instant messages, Facebook messages and texts - The Communications Act of 2003 (section 127) describes what constitutes an offence. But it is worth being aware that an offence is complete as soon as the message has been sent, there is no need to prove any intent or purpose. Researchers have found that pupils with special educational needs are 16 per cent more likely to be victims of online abuse.

7.7 Good practice cards are issued to staff working with children, young people and vulnerable adults as prompts. See below:

Safeguarding Checklist – keeping you safe

- Ensure that you are familiar with the Risk Assessment appropriate to the activity.
- Avoid physical contact with participants - it can be misinterpreted. It is the responsibility of a group's or organisation's staff to intervene and manage behaviour amongst a participating group.
- Avoid one-to-one situations, particularly in an enclosed or isolated space. Should this happen inadvertently, send the child, young person or vulnerable adult to join the main group.
- Respect the wishes of a child, young person or vulnerable adult.
- Do not take inappropriate photographs of participants.

¹⁴ E-Safety: A Practical Guide for Schools. RM Education 2013

- Communicate with children, young people and vulnerable adults in a way that is appropriate to their age and understanding.
- Recognise that children/young people see adults as role models and that your standard of behaviour is important at all times.
- Ensure that other adults attending a group, such as volunteers and parents, recognise the need for appropriate behaviour at all times.
- Don't make suggestive (sexual or lewd) remarks in the presence of children, young people, vulnerable adults or any other National Park users.
- If you suspect that a young person is becoming inappropriately attracted/attached to you, ensure that you raise your concerns with your manager.
- If you feel that you are at risk of behaving unprofessionally (for instance because you are under stress or have inappropriate feelings towards a child, young person or vulnerable adult) you should discuss this with your manager or the Head of People Services.

Remember: Know of and follow all procedures and instructions; do not rely on 'your good name' to protect you.

7.8 Residential Placements¹⁵

There are occasions where Authority staff are involved in residential or overnight stays with children, young people and vulnerable adults. Staff have a 'duty of care' to ensure all visits are conducted in a suitably supervised and safe environment for participants and so far as is "reasonably practicable" to minimise any risk which the activity may entail.

Staff should approach these activities in the same way that they would activities which take place over a shorter period. They should

- Prepare a risk assessment relating to all aspects of the stay and keep this on file. This should include reference to instances that are unique to residential visit. For example, if the participant is camping, what should they do if they need the toilet during the night. It is not enough to assume that participants will know. For many, this may be their first experience of being away from home and family.
- Inform the organisation, school or parent/guardian responsible for the child, young person or vulnerable adult exactly what the residential involves; what they will do, where they will stay, what they will need etc.
- Ensure that the trip has appropriate ratios of staff to participants. Remember, ratios change depending on the age and ability of the participants but also depending on where they are going and what they will be doing.

¹⁵ Planning and Leading Visits and Adventurous Activities. RoSPA. 2013

- Residential visits may include the following activities, which have been categorised as high risk: camping, transport by minibus, mountain walking, swimming outdoors and other water-based activities, cycling.
- PCNPA Staff and volunteers involved in delivering residential activities for children and vulnerable adults should undergo an Enhanced DBS check with a check on barred lists.

7.9 Guidance on safe and effective intervention

The use of force should only be a last resort. The focus of any session should be on creating a calm, orderly and supportive climate where children, young people and vulnerable adults can discover the National Park safely and in a way that enables them to grow and mature.

Very rarely an incident will occur that requires the need for force of any kind. Before intervening in any situation remember;

- The Authority asks schools and organisations bringing children, young people or vulnerable adults out to experience the National Park to agree terms and conditions. These state that organisational staff have responsibility for the behaviour and management of those in their care. Legally, only individuals to whom the senior member of staff of that organisation e.g. a head teacher, has designated responsibility can intervene.
- It is better to distract than to intervene.
- If intervention becomes necessary, staff need to be aware of sensitivities associated with any form of physical contact.

Authority staff should, where possible, allow those professionals accompanying children, young people and vulnerable adults to manage their groups. These people know those in their care better than Authority staff. Intervention should only take place to prevent someone from:

- Committing an offence.
- Causing personal injury to, or damage to the property of, any person, including themselves.
- Prejudicing the maintenance of good order and discipline among any group receiving education.¹⁶

¹⁶ Education and Inspections Act 2006

7.10 Guidance on managing situations where children or vulnerable adults become lost (separated from their parent or guardian) on National Park Authority premises.

Guidance is set out in the National Park Authority's [Missing Child/ Lost Child Procedure](#). The procedures are in place at PCNPA centres, they can also be adapted for use at events organised by the Authority as required.

8. Volunteers

- 8.1 The Authority will treat volunteers in the same way that it treats employees with regard to safeguarding.
- 8.2 Volunteers whose role will bring them into regular contact with children, young people and vulnerable adults will follow similar checks to those put in place for recruiting staff. This will include an interview, the seeking of referees and such checks as are appropriate to their role.
- 8.3 However, most volunteers currently do not work alone with children, young people or vulnerable adults and so DBS checks are inappropriate. Even so, good recruitment practice suggests that these volunteers should be assessed/recruited with their suitability for working with these groups in mind.
- 8.4 Safeguarding, including a summary of this statement, is included in the Volunteer Handbook, copies of which are made available to all the Authority's registered volunteers.

9. Work experience/placements involving children, young people and/or vulnerable adults

- 9.1 Work experience placements differ from other types of contact as they tend to involve single students working with a range of Authority staff over a period of time.
- 9.2 In line with good practice the Authority recognises that the duty of care for work placement students lies with the school, college or body that arranged the placement. As such it is their responsibility to ensure that all necessary risk assessments and checks have taken place.
- 9.3 However, as part of good practice the Authority will
 - Ensure that a risk assessment is in place for all work experience placements.
 - Minimise as far as possible the time spent by the student working one to one with staff, in isolated environments or travelling in Authority vehicles (see Section 7.2).
 - Seek, where appropriate from the school or parent/guardian, information relating to vulnerable students that may impact on Authority employees or volunteers.

9.4 No employee should agree a work placement without informing the Head of People Services. This should form part of the risk assessment process.¹⁷

10. If you suspect abuse or mistreatment

10.1 If you do have concerns about the well-being of a child, young person or vulnerable adult, you should

- Show that you have heard what the child, young person or vulnerable adult is saying, and that you take their allegations seriously.
- Encourage the individual to talk, but do not prompt or ask leading questions; Don't interrupt when the individual is recalling significant events. Don't make them repeat their account.
- Explain what actions you must take, in a way that is appropriate to the age and understanding of the child, young person or vulnerable adult.
- Do not promise to keep what you have been told secret or confidential, as you have a responsibility to disclose information to those who need to know. Reporting concerns is not a betrayal of trust.
- Write down as soon as you can and no later than 24 hours after what you have been told, using the exact words if possible. Include details of the date, time, place and any other people who were present.
- Report your concerns to your Line Manager or Safeguarding Lead as soon as possible, and not more than 24 hours after. Where appropriate you may wish to inform a member of staff from the school or organisation of what has been said.
- Do not confront the alleged abuser.
- Do not worry that you may be mistaken. You will always be taken seriously by safeguarding agencies. It is better to have discussed it with somebody with the experience and responsibility to make an assessment.

10.2 In all cases, you should keep a written record of what was said and done.

11. What to do if you are concerned about a member of staff

11.1 It is often difficult to accept that a colleague may have harmed a child, young person or vulnerable adult. Often suspicion may take the form of concerns rather than known facts. It is important that if the behaviour of an adult or colleague gives you cause for concern, **either in the workplace or in their private life**, that you:

- Do not dismiss or ignore your concerns.
- Do not confront the person about whom you have concerns.
- Raise your concern with your Line Manager or the Safeguarding Lead.

¹⁷ Safeguarding Young People on Work-Related Learning including Work Experience (DFCS 2010)

11.2 Concerns may not trigger an investigation, but they help to build up a picture, along with concerns from other sources, of a person. Remember that the All Wales Safeguarding Procedures ([Safeguarding Wales](#)) ensure that the adult is protected as well as the child.

11.3 When you raise a concern you will be asked

- The nature of those concerns.
- How and why those concerns have arisen.
- Any relevant details relating to those concerns.
- Any information affecting the safety of children, young people, and vulnerable adults, or other members of staff.

11.4 Just as when making a referral on behalf of a child, young person or vulnerable adult, the referral process cannot maintain the anonymity of the person making the referral.

12. Making and Dealing with Allegations of Abuse against Staff and Volunteers¹⁸

12.1 It is essential that any allegation of abuse made against a member of staff or volunteer is dealt with fairly, quickly and consistently, in a way that provides effective protection for the child, young person or vulnerable adult, and at the same time supports the person who is subject of the allegation.

An allegation may relate to a person who has:

- Behaved in a way that has harmed a child, young person or vulnerable adult.
- Possibly committed a criminal offence against or related to a child, young person or vulnerable adult.
- Behaved towards a child, young person or vulnerable adult in a way that indicates that they are unsuitable to work with children.

12.2 What will happen if an allegation is made?

Any allegation involving Authority staff or volunteers must be passed immediately to the appropriate Line Manager and then the Authority Safeguarding Lead or deputy.

The Line Manager must ensure that they have all appropriate details relating to the allegation. Details might include:

- When and where the alleged incident took place.
- The details of those involved.
- The nature of the allegation.

¹⁸ Procedures based on Pembrokeshire Local Operational Group (LOG) Safeguarding Board guidance

- How the allegation was followed up and resolved (This part of the record may be added at a later date, and not when collecting initial details).

12.3 What is the process for dealing with an allegation?

Allegations may be dealt with in two ways:

- Internally (Only for allegations that present no clear evidence of abuse).
- Through referral to the multi-agency CCAT or Adult Safeguarding Team.

If the allegation is referred the process can be summarised in 5 key points

1. Initial discussion between PCNPA lead and local assessment team.
2. Telling the staff member(s) concerned.
3. Managing staff/considering suspension if appropriate.
4. Strategy discussion.
5. Investigation and outcome.

12.4 Investigation and Outcome

If the matter is serious, it will become the subject of a Child/Adult Practice Review. At this point the employee will be suspended on pay pending the conclusion of the investigation. An employee will be suspended if there is a risk of further misconduct and the Authority needs to safeguard children, or where the employee's presence at work compromises the investigation.

Suspension is not an indication that the Authority has concluded that the employee is guilty.

An employee will not be suspended if the allegation is not serious or where the employee can carry out a large part of their work whilst ensuring no further contact with children, young people or vulnerable adults.

The Authority will carry out its own investigation as part of a Disciplinary Procedure, whilst ensuring that it does not jeopardise any Practice Review. The Authority is entitled to treat the matter as a disciplinary matter regardless of the outcome of any external investigation.

The Practice Review is a multi-agency process which can lead to criminal action or a range of other actions decided upon on a case by case basis.

Every effort should be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

12.5 How long might an investigation last?

It is reasonable to expect that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.

Any record relating to an allegation should be retained until the staff member has reached normal retirement age or for a period of ten years from the date of the allegation if that is longer.

12.6 If an allegation is proved to be false

If an allegation is proved to be false, the Authority in consultation with relevant professionals should undertake a review to determine the reasons for the original accusation and to minimise the negative impact of the accusation on the individual concerned.

13. Whistleblowing Policy¹⁹

- 13.1 “Whistleblowing” is the term used to describe a situation in which an employee discloses, internally or externally, any malpractice or wrong-doing that they observe or are aware of, as well as illegal acts or omissions at work.
- 13.2 Pembrokeshire Coast National Park Authority has a whistleblowing policy which seeks to encourage the highest possible standards of openness and accountability, whilst reassuring employees to feel confident in raising their concerns without fear of victimisation, subsequent discrimination or disadvantage.
- 13.3 “Whistleblowing” has shown itself to be an essential tool in combatting the abuse of children and vulnerable adults, as such the Authority’s whistleblowing policy encourages employees to raise concerns in any circumstance where they genuinely and in good faith believe that there is a risk that abuse is taking place.

14. Contact Information – Authority Safeguarding Leads

- 14.1 The Learning and Inclusion Team Leader [Graham Peake], is the safeguarding lead for the Authority and is the first point of contact for incidents and issues.
- 14.2 In the absence of the Learning and Inclusion Team Leader, contact the Head of Engagement and Inclusion [Libby Taylor], or the Chief Executive [Tegryn Jones]. At least one of these PCNPA representatives should be available outside of normal office hours.
- 14.3 Graham Peake – Learning and Inclusion Team Leader
Mobile: 07452 350871
Email: grahamp@pembrokeshirecoast.org.uk
- 14.4 Libby Taylor – Head of Engagement and Inclusion
Mobile: 07967 360689
Email: libbyt@pembrokeshirecoast.org.uk

¹⁹ PCNPA Whistleblowing Policy

14.5 Tegryn Jones – Chief Executive
Mobile: 07581 196240
Email: tegrynj@pembrokeshirecoast.org.uk

14.6 Joy Arkley – Head of People Services
Mobile: 07875705729
E-mail: joya@pembrokeshirecoast.org.uk

14.7 Direct Contacts for the Local Authority Safeguarding teams in Pembrokeshire

Please Note: All initial disclosures or other concerns should be reported through one of the Safeguarding representatives listed above.

14.8 Children
During Office Hours: Child Care Assessment Team (CATT)
Tel: 01437 776444
Email: ccat@pembrokeshire.gov.uk
Outside of Office Hours: Emergency Duty Team – Tel: 0300 333 2222

14.9 Adult
During Office Hours: Adult Safeguarding Team – Tel: 01437 776056
Email: adult.protection.team@pembrokeshire.gov.uk
Outside of Office Hours: Emergency Duty Team – Tel: 0300 333 2222

14.10 Other Useful Telephone Numbers:
NSPCC: 0808 8005000
Childline: 0800 1111
Domestic Abuse Helpline: 0808 8010800

15. Monitoring and Assurance

15.1 This policy will be reviewed on an annual basis by the Authority's Safeguarding Group and will be presented to NPA every three years.

15.2 Compliance and implementation of this policy will be monitored by the Safeguarding Group. Organisational level concerns identified by the group around compliance and implementation of the policy will be brought to the attention of the Management Team and where appropriate to Members through Audit and Corporate Services Committee.

16. Related Policies and Operational Procedures

16.1 Whistleblowing Policy

16.2 Recruitment Policy

16.3 Data Protection Policy

16.4 Retention Schedule

Appendix 1 – Schedule of roles of staff/ volunteers in relation to safeguarding and DBS Checks

The roles described here are by necessity, generic and encompass multiple specific roles across the authority. The aim of the list is to support decision making when deciding which roles require DBS checks. The descriptions and the eligibility status for enhanced DBS checks were drawn from advice provided by the WCVA Safeguarding Team and Disclosure and Barring Service's eligibility guidance²⁰.

For more specific guidance please contact the Authority's HR Team or the Safeguarding Lead.

Role 1 – Engagement and Inclusion Officers, Rangers and Education Officers

As part of their work, officers deliver a programme of activities and events and engage with a range of audiences:

Education programme:

- Focus on working with pre-school, primary & secondary school children and teachers, delivering half-day and full-day sessions in the National Park, undertaking a range of 'hands-on' practical activity. Officers plan and lead sessions for whole classes and sometimes have responsibility for smaller groups as and when an activity demands (these could sometimes be undertaken out of visual contact with teachers). Various locations, including NP run centres. Groups include Early Years, Reception and KS1 through to 16+, including children and young people with a range of special needs. They may work with 3-4 schools a week and may work with the same group on more than one occasion.
- **Eligible for enhanced DBS check only.**

Social Inclusion programme:

- Often working with vulnerable adults and young people on a range of practical/hands on activity. May take responsibility for small groups on specific activities. Can work with the same group on several occasions. On occasions rangers work with groups who are outside their normal 'care setting' e.g. on residential visits with youth clubs.
- **Regulated activity, enhanced DBS and barring lists checks.**

Activities and Events

- Delivering activities and events for families and other groups. Parents usually present, but group can spread out over a large area, on a beach for example. Some activities involve leading groups of vulnerable adults on (for example) a

²⁰ Disclosure and Barring Service Enhanced DBS check eligibility guidance. ([Eligibility guidance for enhanced DBS checks - GOV.UK \(www.gov.uk\)](http://www.gov.uk))

guided walk, these groups can be accompanied or unaccompanied. Do not come into contact with the same group and/or individuals regularly.

- **Not eligible for check.**

Youth Rangers/Next Generation/Duke of Edinburgh:

- Running sessions (both practical work and indoor sessions) for groups of young people (14+) on a regular basis – often the same individuals. No parents/guardians present.
- **If frequency criteria met, regulated activity, enhanced DBS check and barring list check.**

Work Experience Placements:

- Takes responsibility for individual placements at a specific location or series of locations. Placements agreed with school and can be under 16. A range of activity carried out over a single week/two weeks.
- **If intensity criteria met, regulated activity, enhanced DBS check and barring list check.**

Role 2 - Centre based activity leaders/officers.

Education programme:

Centre based staff work with primary and secondary school children and teachers, delivering half-day and full-day sessions at their own centre, undertaking a range of 'hands-on' practical activity. Leaders deliver sessions for whole classes and sometimes have responsibility for smaller groups as and when an activity demands (these could sometimes be undertaken out of visual contact with teachers). Groups include Reception and KS1 through to 16+, including children and young people with a range of special needs. They may work with 3-4 schools a week and may work with the same group on more than one occasion.

- **Eligible for enhanced DBS check only.**

Social Inclusion programme:

- Occasionally working with vulnerable adults and young people on a range of practical/hands on activity. May take responsibility for small groups on specific activities.
- **Eligible for enhanced DBS check only, if not meeting frequency criteria.**

Activities and Events:

- Delivering activities and events for families and other groups. Parents usually present, but group can spread out over a large area. Not working with the same group or individuals on a regular basis.
- **Not eligible for check.**

Work Experience Placements:

- Takes responsibility for individual placements at a specific location. Placements agreed with school and can be under 16. A range of activity carried out over a single week/two weeks.
- **If intensity criteria met, regulated activity, enhanced DBS check and barring list check.**

Role 3 - National Park staff responsible for placement students:

- Takes responsibility for individual placements at a specific location. Placements agreed with school and can be under 16. A range of activity carried out over a single week/two weeks.
- **If intensity criteria met, regulated activity, enhanced DBS check and barring list check.**

Role 4 – Volunteer Walk Leader

- Leading guided walks at various locations across the National Park for various groups. Groups are adults but can include some vulnerable adults (with carers). Not working with the same group or individuals on a regular basis.
- **Not eligible for check.**

Role 5 – Volunteer Activity Leader/Support

- If the lead volunteer has sole responsibility for the group/individuals or if they are working away from a lead officer for a prolonged period and if the audience includes vulnerable adults. Then volunteer activity leaders would be:
- **Eligible for an enhanced DBS check if intensity criteria met.**

Intensity criteria

The “intensity criteria” in the context of DBS (Disclosure and Barring Service) checks refers to the level of contact or interaction a role has with vulnerable groups, such as children or vulnerable adults. This criterion helps determine whether a role is eligible for a standard or enhanced DBS check.

For example:

- Standard DBS Check: Typically required for roles involving regular contact with vulnerable groups, but not necessarily in a supervisory or intensive capacity.
- Enhanced DBS Check: Needed for roles with more intensive, frequent, or unsupervised contact with vulnerable groups, such as teaching, healthcare, or social work.

Policy Control Sheet

Change Level

Change Level	Tick
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Minor editorial/ accuracy changes	
Change requires Management Team Approval Only	
New Policy or Change requires NPA Approval / People Services Committee Approval	✓

Consultation

Group	Date
Safeguarding Group	11/10/2024

Assessments

Assessment – If Applicable	Date
Integrated Assessment – Full	N/A
Integrated Assessment – Policy/ Procedure Review	N/A
Data Protection Impact Assessment	N/A

Approval

Approved by	Name	Date	Signature
NPA			

Version History

Version	Active Date	Summary of Changes
3		Amendments in terms of Safer Recruitment. Updates to reflect changes in roles following organisational restructure.

Review

Version	Active Date	Document Owner	Review Date Trigger
3			Annually by the Safeguarding Group. To be presented to NPA every 3 years.

Publication

Policies must be co-ordinated through the Performance and Compliance Team, for compliance, auditing, and control purposes. Please send all new or reviewed policies once approved to mairt@pembrokeshirecoast.org.uk for formal publication of policy to staff and where required on the Authority's website.

Publication	Date
Published on Sharepoint Corporate Policy Hub	
External Policy – Published on Website: HTML	