

# Safeguarding Bulletin

**Safeguarding disabled young people and adults at risk**

**ann craft trust**  
acting against abuse

**January 2020**

**Issue 110**

Bringing you the latest research and news on safeguarding disabled young people  
and adults at risk.

# Ann Craft Trust Team



**Deborah Kitson**

CEO



**Charlotte Brooks**

Marketing Officer



**Lisa Curtis**

Safeguarding Adults  
Manager



**Elliot Davies**

Marketing Officer



**Nicola Dean**

Safeguarding Adults in  
Sport Manager



**Richard Fletcher**

Safeguarding Adults in Sport  
Admin



**Sarah Goff**

Safeguarding Disabled  
Young People Manager



**Julie Mather**

Finance



**Nat Rock**

Administrator



**Laura Thorpe**

Safeguarding Adults in  
Sport Manager



**Kimberley Walsh**

Safeguarding Adults in  
Sport Manager

# Trustees and Management Committee

**Chair—Dave Marsland**, Lecturer in Social Work

**Sallie Barker**, Chair of Safeguarding Adults in Sport Steering Group

**David Charnock**, Director of equality diversity and inclusion, Queen's medical centre

**Malcolm Dillon**, Consultant

**Rachel Fyson**, Professor in Social Work

**Tania May**, GP

**Rob Morgan**, Management Accountant

**Penny Standen**, Professor of Health Psychology and Learning Disabilities

**Suzanne Wilson**, Consultant Clinical Psychologist

## Patrons

**Sir Roger Singleton**

**Kate Spicer**

# Ann Craft Trust Safeguarding Bulletin

January 2020

Issue 110

## In this issue

**Page 5**   **Editors Note**

**Page 7**   **Safeguarding Adults Week 2019 Reaches More than 5 million People**

**Page 10**   **We Matter Too** Sarah Goff & Anita Franklin

**Page 19**   **Recognising Modern Slavery Risks in Social Care** Alison Gardner & Jason Grove

**Page 24**   **The Role of the Charity Commission in Safeguarding** Catherine Edginton

**Page 36**   **Self-Care & Self-Neglect** Kate Spicer

**Page 38**   **Safeguarding Children in Nigeria** Osinfowokan Omosalewa Grace

**Page 42**   **Farewell from Ieuan Watkins**

**Page 44**   **Meet Richard Fletcher, Our New Safeguarding Adults in Sport Admin**

**Page 45**   **ACT Collaborate with UK Coaching on Safeguarding Resources**

**Page 46**   **Job Vacancy—Head of NSPCC CPSU**

**Page 47**   **Safeguarding News Roundup**

**Page 50**   **Research & Resources**

**Page 53**   **From the Vault:**  
“People’s lives are made a misery.” Donna Burton, April 2004

## Editor's Note—Deborah Kitson, CEO

### Welcome to Edition 110 of the ACT bulletin.

The team at ACT would like to wish you all the best for 2020. With the festive season behind us I am guessing that people are now focussing on summer holidays and sunny climes. News has continued to be dominated by Brexit and more recently the royals. Whatever one's views I think

many of you will agree that we cannot lose sight of other issues. Further discussions about health and social care, for example, would be welcomed. We'd also like to see further commitment and planning for the

future of those most vulnerable in our society, rather than short term reactions when things go wrong.

I am pleased to say that this bulletin features summaries of the presentations from our ACT conference last November. It was great to see so many of you there, and you can already save the date for this year – November 19th!

Once again, in 2019 we held the conference during Safeguarding Adults

Week. We had some great presentations from speakers who are working in key areas of interest, including modern slavery, transforming care, domestic abuse and the safeguarding and the charity commission. The day included great networking opportunities and we also want to thank the staff at Sense's

Touchbase Pears who kindly let us use their venue as their contribution to Safeguarding Adults Week and looked after us so well on the day.

I'd like to take this opportunity to thank Sir Norman Lamb for

attending our conference, and for talking so movingly on the topic of transforming care. We're looking to explore this issue in greater depth in future bulletins and blog posts, so watch this space.

There is also an update in this bulletin on Safeguarding Adults Week 2019. We have some stunning figures to share about our reach. So many actively participated by running training, holding events, hosting information stands, and generally raising awareness.

“

*You can already save the  
date for this year's ACT  
Safeguarding  
Conference—November  
19th!*

”

## Editor's Note—Deborah Kitson, CEO

We have an article by Kate Spicer, one of our Patrons. She writes about her brother and concerns she has for his wellbeing, despite his great carers. Kate and her brother released a film a few years ago—*Mission to Lars*—about her brother's quest to meet his hero, the drummer from Metallica. It's a great watch for anyone who has not seen it yet.

We also have an interesting article by Omosalewa Grace, Program Officer in Child Protection and Gender in Nigeria. He is an ACT supporter and asked if he could write this paper for our bulletin. We are always interested in hearing what work is going on both in this country and overseas, so a big thank you to Omosalewa.

I also need to mention our new member of staff, Richard Fletcher who started with us this month and will be working with the Safeguarding Adults in Sport team. And sadly, we said goodbye to Ieuan Watkins who took up the new post funded by Sport Wales over a year ago and left us this month. We wish him all the best for the future and are pleased that he will continue to be an ACT Associate Trainer. Both Richard and Ieuan have written a short piece in this bulletin.

“

*I'd like to take this opportunity to thank Sir Norman Lamb for attending our conference, and for talking so movingly on the topic of transforming care.*

”

We also have two new Trustees elected at the AGM in November so welcome to David Charnock and Malcolm Dillon. You can find out more about them and all the Trustees on our website.

We have details about ACT training and you can access further information about ACT events and a range of new resources on our website. We would welcome your thoughts about these and future resources that you would find relevant and useful.

So enjoy the bulletin, and please get in touch if you would like to contribute to future editions of the bulletin. We would love to hear what you have planned this year.



# Safeguarding Adults Week 2019 Reaches More Than 5 Million



## National Safeguarding Adults Week 2019 Took Place 18–24 November.

For the 2019 National Safeguarding Adults Week, we collaborated with The SAB Manager Network and The University of Nottingham. We aimed to create a time where we can all focus on safeguarding adults – so we can be better, together.

We were overwhelmed by the response we received.

### Incredible Reach

We encouraged people to use the hashtag **#SafeguardingAdultsWeek** to talk about their activity during the week.

Using the [Tweet Binder](#) tool, we tracked how that hashtag performed over the

course of the week.

So from 18–24 November, there were:

- 4,658 tweets
- Which reached **5,638,560 people**
- And were seen **16,980,548 times**

Our aim was to raise awareness and reach as many people as possible. We ultimately reached nearly six million people. What's more, critical safeguarding resources reached nearly 17 million people.

So on behalf of everyone at the Ann Craft Trust, a massive thank you to all who helped us get the word out!

### Starting a National Conversation

# Safeguarding Adults Week 2019

Individuals and organisations across the country shared their activity on Twitter. We saw pop-up stalls in public places, a wealth of invaluable resources, and some fantastic videos. Many more shared our [safeguarding resources](#), and it all helped to raise awareness of numerous key issues.

For much of the week, [the University of Nottingham lit their Trent Building in ACT green](#).



## ACT Safeguarding Adults Seminar 2019

The week also coincided with the ACT Annual Safeguarding Seminar and AGM.

The day saw engaging talks from a number of expert speakers:

- **Dr Alison Gardner** – Recognising modern slavery and exploitation in social care.
- **Sir Norman Lamb** – Transforming Care.
- **Professor Anita Franklin and Sarah Goff** – [We Matter Too!](#) Findings from research looking at domestic abuse and people with learning disabilities.
- **Catherine Edginton**, Senior Safeguarding Lead, The Charity Commission.

## We Cannot Thank You Enough!

We were quite overwhelmed by the response we received.

So no matter what you did to support Safeguarding Adults Week – whether you put on an event or simply retweeted someone else – we'd like to say a massive thank you.

[Safeguarding Adults Week launched in 2018](#). To go from zero to nearly 17 million views in the space of a year is fantastic. And we could not have done it without you.

We want to make Safeguarding Adults Week 2020 even better! We'd love to hear your thoughts. Let us know what sort of themes you'd like us to cover, and what sort of resources you'd like us to produce. [So get in touch!](#)





## **Safeguarding Adults at Risk Training for Managers & Safeguarding Leads**

**This course will explore the roles and responsibilities of managers in terms of safeguarding adults at risk.**

We'll look at the key changes within safeguarding as part of the Care Act. You'll be encouraged to identify where the challenges are, and to seek solutions towards implementation in practice.

### **What to Expect**

We'll cover best practice, the expectation of regulators, and the lessons we learned from our safeguarding adults reviews.

This course is for managers who have a role that includes responsibility for safeguarding in their organisation. This could include managers, senior managers, safeguarding leads, and compliance managers.

### **When and Where**

2 March, **University of Nottingham** — [Book a Place »](#)

# We Matter Too!

**Sarah Goff, Safeguarding Disabled Young People Manager, Ann Craft Trust; Professor Anita Franklin, University of Portsmouth**



**We Matter Too looks at the needs of disabled young people experiencing domestic abuse. It's an exploratory study with multi-agency practitioners and young disabled adults.**

What's the rationale behind this study? Consider the importance of intersectionality. Young disabled adults will have faced higher risks of *all* forms of harm and abuse, and are more likely to have already had other undisclosed experiences of emotional, physical and sexual abuse (Jones et al 2012).

Interventions have often focused on impairment. So social and emotional needs have often been missed (Ofsted 2012; Taylor 2014; Franklin et al 2015).

Young disabled adults are less likely to have had a choice. Restrictive practices may have further impacted on their understanding of themselves, and their safety (CBF, 2019; OCC 2019).

Disabled young adults who experience domestic abuse may not be getting the support they need. Almost 1 in 5 Multi Agency Risk Assessment Conferences

# We Matter Too!

(MARACs) received no referrals for 16-17 year olds in the past 12 months. Over 1 in 10 MARACs received no referrals for a disabled person of any age in the past 12 months.

Disabled victims of domestic abuse experience:

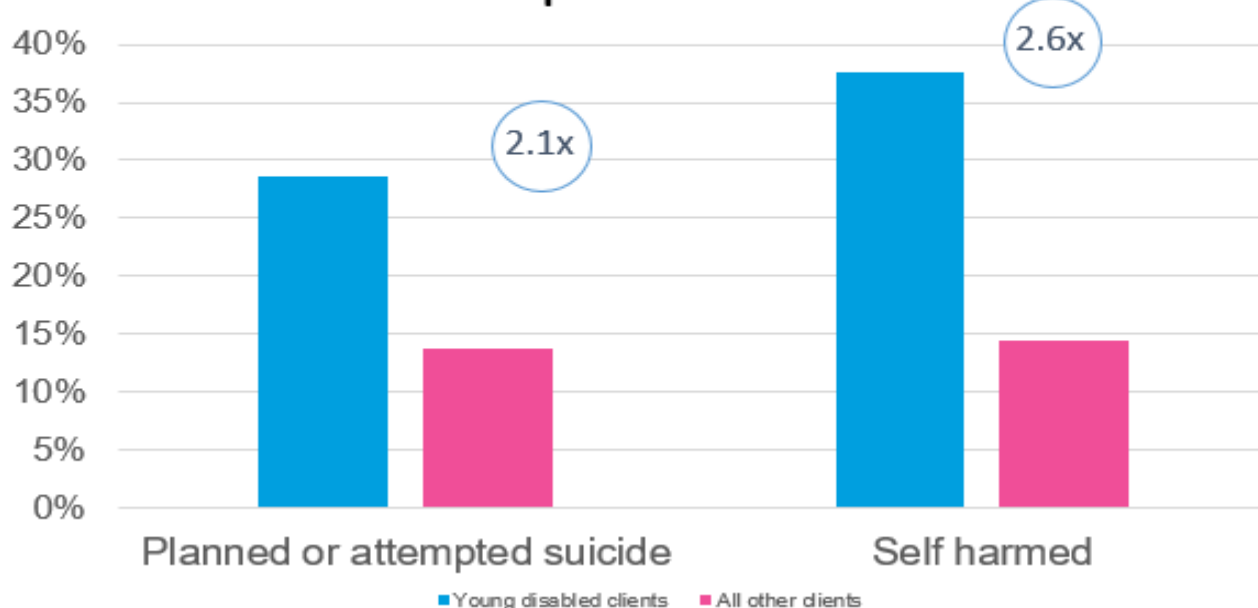
- More severe and frequent abuse over longer periods of time.
- 2.3-3.3 years before seeking support.
- 8% more likely to continue to experience abuse.
- 20% experienced ongoing physical abuse.

- 7% ongoing sexual abuse.

The aims of the We Matter Too project are to:

- Understand the experiences of disabled young people of support and intervention by domestic violence services, police, health, social care etc.
- Explore what disabled young people want from domestic abuse services and support agencies and what good practice would look like to them.
- Understand from professionals what

## Young disabled people were more likely to have used destructive coping mechanisms or to have planned or attempted suicide



# We Matter Too!

works to support disabled young people.

- Understand what the barriers are to delivering this support.
- Develop training materials and policy and practice recommendations.

The advisory group for the We Matter Too project comprised of domestic abuse services at local and national levels. We spoke to social care workers from both the children and the adult sectors, as well as adult social workers from a local authority that had already addressed CSE across the age groups. We talked to people from disability services, education, survivors organisations, and a mental health practitioner. The police were willing to contribute, but unable.

This was an exploratory study. Our research methods were qualitative, not quantitative. As well as a literature review, we completed in-depth interviews with more than 30 multi-agency professionals across England. We also interviewed a number of disabled young people aged between 17 and 25, with some group discussions too. We developed and piloted training based on our findings.

The process of looking for young disabled 17–25 year olds to talk to indicated that young disabled women are more visible, but often in the capacity of parents. Young disabled men, though, are not so visible. In some services, they're effectively invisible. We struggled to find supported young adults who had experienced harm, and had recovered. Most were located via residential settings now living away from home. Three were located via current domestic abuse projects, and one through outreach. Several young adults to whom we were going to speak ended up in crises, which speaks volumes of the levels of instability in their lives. We also found it hard to get responses from “mainstream” services. Does this suggest that disability is marginalized within mainstream provision? And yet, many workers told us that high numbers of the young people in their services had learning needs, or undiagnosed needs which they thought should have been identified.

There are also lessons to be learned from the conversations we had with agencies while looking for participants. In some cases, we felt we were raising awareness

# We Matter Too!

of the issues within the services merely through making contact. For example, one group realised that they had never thought about collecting data about young men or disabled young people prior to us contacting them. Some felt unable to take part because they “did not work with disabled people”. Some indicated that young people did not tend to contact them. Some suggested that they were overstretched and underfunded. We got the sense that some were waiting for people to come to them.

## **Key Findings From the We Matter Too Project**

We found that, despite there being evidence that both young people and disabled people face greater risks, the effects of domestic abuse on young people with disabilities and their needs are not high on the agenda for policy and practice and often remain hidden. Some services do not yet recognize the need to provide a service for this group. This results in no help given, with increased risks of abuse and isolation.

Many of those with learning disabilities do not meet the criteria for receipt of care in children’s disability or mainstream

services, or in adult services. So they remain invisible.

Some of those we spoke to raised concerns about the high levels of violence disabled young adults face within their own intimate relationships. Issues of isolation, low self-esteem, lack of education about healthy relationships, and invisibility to services all serve to heighten vulnerability.

Disabled young adults are less likely to have a voice, and to be heard and recognised. That means they’re less likely to seek or receive help than some other groups of young people. When they are distressed or unsafe, disabled young adults are not always understood. This has some parallels with other forms of relationship harm, and with some forms of exploitation. While there are some pockets of good practice, it is patchy. The needs of young disabled people too often fall through the gaps between services, particularly between children’s and adults’ services.

The research highlights just how difficult it is for disabled young adults to recognize domestic abuse, talk about it and feel that they can do anything about it. Service provision is not readily available.



# We Matter Too!

And all of these issues are compounded by some staff finding it hard to ask, talk about, or do direct work involving domestic violence with this group.

## Gendered Issues

Young women with learning disabilities fear losing their children, and are therefore reluctant to ask for help when they face domestic abuse. Additional challenges were noted for young women with disabled children, meaning families are often forced to stay in abusive situations. Other situations can force disabled young people to stay in abusive relationships, including the need to be close to specialist provision, and the need

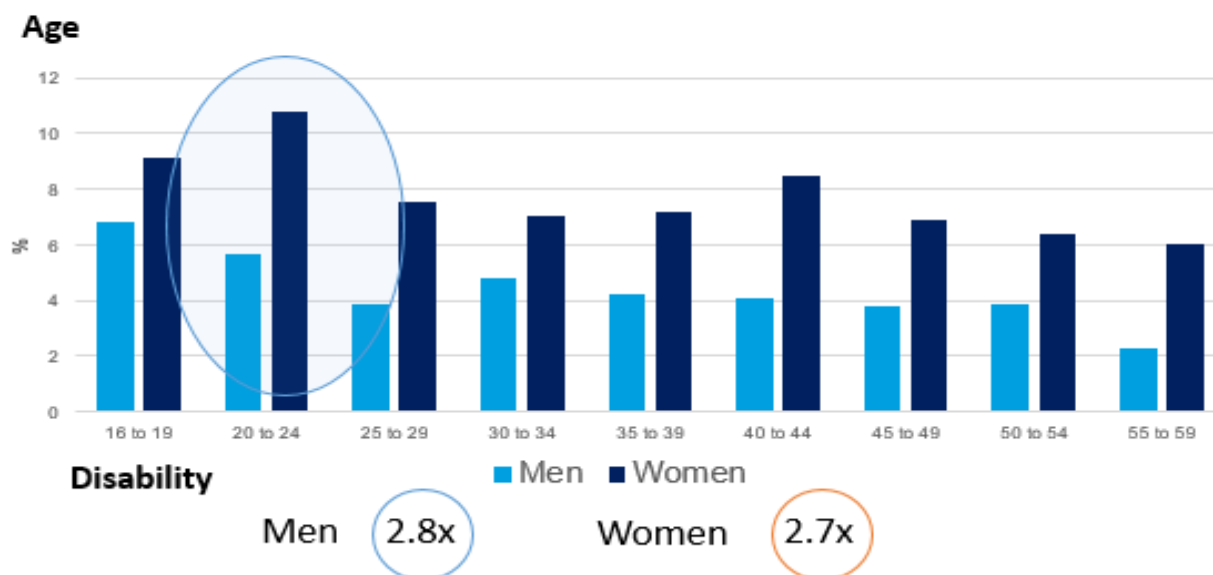
for support from a wider family or friendship network. Those who live in adapted homes, or whose children need specialist equipment, may also compel some to stay in abusive situations.

Meanwhile, ties to a geographical area can reduce the chances of someone finding safe alternative housing. And very few refuges are willing to accommodate teenage boys.

Some of the disabled young mothers we spoke to did receive social care intervention, but only for their children. It was not designed to help their recovery, and it's always hard to get learning disability support.

## Prevalence

**Being young or being disabled both increase the likelihood of having experienced domestic abuse in the past year**



# We Matter Too!

Young disabled men are far less visible in any services, with the exception of special colleges and residential settings that offer help and support. But these include only very small numbers of young people in relation to the national population.

Practitioners highlighted that often it is not until they're placed from home for other reasons that some disabled young adults get an opportunity to let anyone know what they have experienced. Our investigation highlighted how disabled young adults are often specifically targeted for sexual, financial or criminal exploitation. The links between experiencing domestic abuse, and being targeted by criminal gangs, is an increasing, unmet issue.

A key group are those young people who do not have a diagnosis but who had learning needs who have already experienced other losses, trauma, or neglect, and who may be excluded or out of reach of services.

A particular gap was identified in meeting the needs of LGBT+ disabled young adults experiencing violence in their relationships. The limited safe spaces, places and services available increases the isolation of this group. Concern was

raised regarding the use of restraint and force against some disabled young people in some residential, secure and educational and other settings, which was felt to be leading some disabled young people to internalise messages that physical aggression is normal.

## **Lack of Data, Awareness, and Training**

A lack of data makes it harder for services to understand the different needs of disabled people. This also makes it hard for them to see the gaps in their services, and to effectively plan and design services. There is a lack of information being gathered at practice level concerning what works.

Some services do not yet recognize the need to actively promote and explicitly provide support for disabled young adults. This means that there is little visible help available to tackle increased risks and isolation. In many cases it was evident that practitioners were aware of unmet needs. But the majority had not had appropriate training, and lacked knowledge and awareness of the needs of this group. Also evident in many local areas was a lack of previous contact or working relationships between domestic abuse support services, and disability

# We Matter Too!

services.

## **Service Design by Omission**

Young peoples' harm is not seen within the lens of domestic abuse, and is therefore not recognised. We encountered transitions and other plans that have not addressed the social and emotional needs of disabled young people, and there's a lack of support to help practitioners make sense of learning needs. As a result, many do not appreciate the extra help that disabled young people may need based on the context of their history, and how they have been cared for.

## **Views of the Young Adults**

Some of the disabled young people we talked to have been witnessing or experiencing abuse for years.

"I thought it was normal", said one. "I didn't think there was anything to tell. It happened from when I was little to when I was in my teens."

"The physical and mental abuse was the normal thing," said another. "There was sexual abuse too."

One told us: "I had not had any education about what abuse was. I can only remember that being nasty to me was

what was normal."

One person was aware that he was able to mask things and answer "mm, aha," when asked he was OK. Their advice to practitioners? "Don't just accept 'aha'. Care, and mean it." Practitioners, they thought, should ask more assertively and more clearly.

A few common themes emerged from our talks with disabled young adults. First is the need for practitioners to take a proactive approach—to ask the difficult questions, and to never assume that just because things seem OK, they are OK.

Other common themes included the need to reduce isolation and dependence, and to develop accessible services.

## **How to Reduce the Impact—Training and More**

There needs to be more training in all services to understand the impacts of trauma, adolescence and domestic, or other forms of abuse. Training should also aim to reduce the risk that disabled young adults themselves are seen as the problem. Instead, their behaviour should be seen as an indication that they need help.

# We Matter Too!

And what do disabled young adults want? They want to learn about healthy relationships, and to be able to talk about these things. They want to have a voice, and for that voice to be heard. They need help to make sense of behaviour and responses, and they need time, trust, and safety before they can open up.

Young disabled survivors of domestic abuse need to be asked about their relationships, their safety, and what's going on. They need to be treated like they matter, and to have professionals who check that their views have been correctly understood. Professionals need to understand that asking for help is hard—even scary. Professionals, including the police, need to understand that often disabled young people are scared when faced with any aspect of an abusive situation. They need to understand that it is difficult to make sense of what happens, that disabled young people may not even understand that what they are witnessing and experiencing is abuse.

In short, disabled young people need people who try to understand their behaviour. They don't always use words, and they don't always have the words to effectively express what is going on. And

above all, disabled young people need help to understand healthy relationships and choices.

## **Summary—The Future of Domestic Violence Support for Disabled Young People**

We need more data to help us form a clearer picture. We need a focus on training and awareness-raising for both practitioners and disabled young people, with specific attention paid to service design and delivery. We need more collaboration, and closer links between the services for children, young people, and adults. We also need to build bridges between domestic abuse and disability services. And anything that happens needs to be a coproduction: Disabled young people must be involved in advising on the services they'll use.

**This article was adapted from a presentation given by Sarah Goff and Professor Anita Franklin at the 2019 ACT Safeguarding Seminar.**

**[You can read the full We Matter Too report here.](#)**



## **We Matter Too—One Day Training Based on the Project**

**This training will explore key findings and learnings from the We Matter Too project.**

We'll consider current practice and look at development. How can we better reach out and provide services for disabled young people experiencing domestic abuse?

We hope this training will allow practitioners and managers to reflect on the services they provide.

### **What to Expect**

The training is aimed at all agencies working with young people. Our aim is to have a multi-disciplinary approach to developing effective partnerships between children and young people and adults' services, domestic abuse organisations and police and criminal justice agencies. It is appropriate for front line practice and managers, and it can be adapted for strategic management.

### **When and Where**

22 April, **University of Nottingham** — [Book a Place »](#)





University of  
**Nottingham**  
UK | CHINA | MALAYSIA

# Recognising Modern Slavery Risks in Social Care

Alison Gardner  
Jason Grove

**MODERN  
SLAVERY**  
Police Transformation

## **What is modern slavery, and how are we responding, nationally and locally?**

Modern slavery is more common than you might think. It's most common in the agriculture, construction and hospitality sectors. But modern slaves are also found in car washes, nail bars, and in packaging and food processing. Modern slavery is obviously a crime in itself, and many traffickers use modern slaves to carry out further criminal activity. Examples include pickpocketing, benefit fraud, shop theft, tarmac driveway fraud, and pop-up brothels.

In 2013 it was estimated that there were between 10,000–13,000 potential victims of modern slavery and human trafficking in the UK. The National Referral Mechanism (NRM) is a framework for

identifying victims of human trafficking and ensuring they receive the appropriate protection and support. In 2016 3,806 victims were referred into the NRM. In 2018, there were more than 6,000 referrals. 46% of these referrals were cases of labour exploitation. 34% were cases of sexual exploitation. 9% were cases of domestic servitude, and the remaining 11% were “unknown”.

48% of referrals related to females, and 52% related to males. 41% of the referrals related to children and young people aged under 18 years. The referrals included victims of 116 different nationalities. Though 71% were from non-EEA countries, more were from the UK than any other country. The other most common nationalities include Albania,

## Recognising Modern Slavery Risks in Social Care

Vietnam, China, Nigeria, Romania and Sudan.

There are currently more than 1,000 live modern slavery police operations running across the UK. These operations include 1,500 potential victims of modern slavery. 42% involve sexual exploitation, 35% labour exploitation, and 12% criminal exploitation. There are 20 operations focused on domestic servitude, and four based on forced marriage situations. Police have noticed a strong correlation between suspect and victim nationalities.

The outcomes of these investigations are discouraging, and they've helped us identify numerous barriers to effective solutions. Less than 2% of charges result in prosecution, with offenders often using a Section 45 defence. There is confusion within the NRM, particularly in regards to the timing of referrals, and the implications for the Crown Prosecution Service.

Then there's the issue of the victims. When they're in a vulnerable state, and when they're being threatened or intimidated, how reliable are their testimonies? There are also challenges when it comes to liaising with victims of modern slavery. There's no dedicated victim liaison

officers to work with, and we often lose contact with victims (for example, when they're repatriated).

After going through the NRM service, it's hard to keep track of victims, and there is limited long-term support from NGOs. Some have even learned how to exploit the NRM, with joint asylum claims for UK status. Some may not even realise they're victims of exploitation. Rather than seeking support for modern slavery, they may instead see their problems as a civil wage dispute. Finally, many cases of modern slavery could be considered hidden crimes. It's impossible to estimate how many cases of domestic servitude and fraud go unreported.

### **Modern Slavery and the 6 Principles of Modern Safeguarding**

The Care Act sets out the six principles that should underpin the safeguarding of adults. Here's how we see each principle applying to the issue of modern slavery.

#### **Prevention**

We need to broaden our understanding of the risk factors that could increase the risks of modern slavery. Common risk factors include anti-social behaviour, poverty, homelessness, and substance

## Recognising Modern Slavery Risks in Social Care

abuse. We're also seeing examples of "cuckooing" (where an individual takes advantage of an adult at risk through first befriending them before taking-over their property for criminal activity) and grooming.

### Proportionality

We need to improve our victim identification processes. Increasing numbers of authorities are using a Multi Agency Risk Assessment Conference (MARAC) approach to safeguard victims of modern slavery. Usually it's statutory organisations with a duty of care that take part, or those with access to data (such as HMRC, DWP and GLAA) and/or the power to intervene (such as Housing Services). The cases discussed include

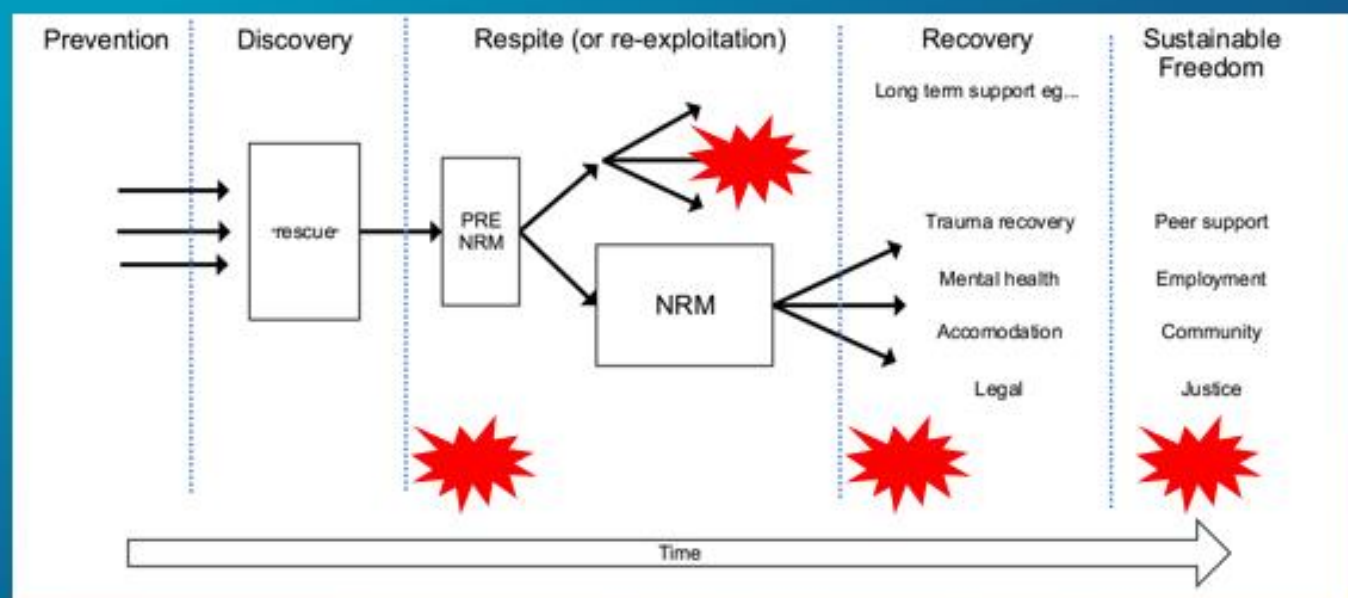
possible indicators of exploitation or modern slavery that require the support of more than one agency.

### Protection

We need to identify gaps in victim and survivor care. This involves identifying the sort of areas where victims can fall out of the system, and areas where they may be vulnerable to re-exploitation. The diagram below illustrates the process.

The key issues are finding adequate housing for victims. There needs to be short-term housing for emergency situations, as well as medium- and long-term housing as cases progress. We need to address how people might struggle to access services, particularly legal, health, and mental health services. Finally, we

### Protection: gaps in victim / survivor care



## Recognising Modern Slavery Risks in Social Care

need to address the lack of coordination among services, and how survivors might need access to long-term support.

We've noticed some interesting "navigator" models emerging, but there's a need for more consistency overall.

### Partnerships

We need to identify areas of strength, and areas where some improvement is needed.

Examples of encouraging developments include the 2017 Collaboration for Freedom Report, and the Anti-Slavery Partnership toolkit. Follow-up research in January-February 2019 involved 27 participants from 51 partnerships. A February 2019 focus group involved 14 coordinators.

New operational, strategic and sub-groups are increasing their memberships and networking. We're seeing the development of dedicated roles, including a dedicated modern slavery unit, an investigation team, and other specialist roles. There is targeted training and activities and materials designed to boost awareness. And alongside all this, we're seeing improved networks, pathways, and information sharing among services.

But we cannot ignore the areas where

improvement is needed. There are many systemic problems to address. Survivors can vanish from the system. The Home Office may not have the capacity to effectively deal with the issue, and there's a need for specialist counselling and, as already identified, housing.

And speaking of capacity, there are issues of costing, and difficulties in delivering activities. Funding is usually only secured if someone takes ownership of an initiative. But there may be an unwillingness for organisations to take ownership, due to concerns of senior-buy in, and a lack of early engagement from relevant agencies.

Finally, despite the encouraging steps towards effective partnerships, there are still barriers to sharing information. We need a more holistic approach to prevention, one that understands the fine line that exists between exploitation and criminality, and between adults and children.

### Accountability

We face a number of challenges when it comes to tracking process. We're dealing with varying structures and referral systems across multiple organisations, with few agreed measures.



## Recognising Modern Slavery Risks in Social Care

Responsibilities and accountabilities are generally unclear, and there are serious limitations when it comes to performance tracking. Finally, outside of the navigator schemes, there are low levels of advocacy for clients.

### **Empowerment**

We need to give survivors of modern slavery a voice, and encourage their engagement in services.

Current systems do not work to empower survivors. In the words of one survivor: “Sometimes the rules make you feel you are in prison. All the rules do not make me feel at home. They make me feel like I am a child, and not able to make decisions by myself.”

Another issue is that consent to enter or avoid the NRM service is often not fully-informed. Survivors are not properly informed of their rights and entitlements. They do not have the time to process a decision, such as being referred to the NRM, or understand the implications of accepting or declining support.

There is not a lot of choice for survivors. One survivor complained that “we’re seen as paperwork, rather than humans.”

There’s also a risk that some survivors may

get re-trafficked thanks to vulnerabilities in the system itself. While waiting for a decision post-interview, survivors often experience trauma. “Like a trafficker, the Home Office promises you care and quality support. Like your trafficking experience, you feel that you cannot run away from the Home office—they know all your details and everything about you.”

(Source: ‘Pre-NRM Accommodation Experiences of Survivors of Modern Slavery’ & ‘The Journey of our UK Survivor Network’)

**This article was adapted from a presentation given at the 2019 ACT Safeguarding Seminar by Alison Gardner and Jason Grove .**

**You can access resources and information relating to modern slavery, along with the other themes of the 2019 Safeguarding Adults Week, on our website. [Find them here.](#)**





CHARITY COMMISSION  
FOR ENGLAND AND WALES

# The role of the Charity Commission: Raising standards of safeguarding practice across the voluntary sector.

**Catherine Edginton – Senior Safeguarding Lead.**

## **Raising Standards**

I am the Senior Safeguarding Lead for the Charity Commission of England and Wales. My current role is to drive the development of the Commission's operational safeguarding capabilities both internally and externally, through the provision of guidance, advice and assistance in and around complex case work. My aim is to ensure the Commission's case workers have the necessary tools and trade craft to assist them in their regulatory and supervisory capacity. A large part of my work is to engage with external partners, to reinvigorate existing relationships and

develop new ones too.

I'd like to focus on how we can raise the standards of safeguarding practice across the charity and voluntary sectors. Apart from the devastating effect on individuals when safeguarding "goes wrong", the sector as a whole can be damaged. This is demonstrated by the results of the biannual Populus survey into public trust and confidence in charities. Previous Populus research has shown that the public name "media stories" as the main reason why their trust has dropped.

## **Target Areas**

To raise standards of safeguarding practice across the voluntary sector, we

## Raising Safeguarding Standards in the Charity Sector

should focus on six key areas:

**The Role of the Commission**—What we do, our supervision and monitoring, our safeguarding strategy, and offering guidance to trustees.

**Reporting Serious Incidents**—The identification and management of serious incidents is crucial. Issues happen, but good management and early reporting demonstrates openness and transparency, which aligns with public trust.

**Learning Lessons**—We need to learn from our mistakes, and from the mistakes of others. Things go wrong, but they shouldn't go wrong too often. We should be constantly alert, and always reviewing how we do things. Be alert to the challenges charities are facing today, such as ensuring your charity remains relevant to today's society, regaining public trust, and building confidence in the charity's leaders to deliver the necessary bold leadership while recruiting and retaining the right staff.

The following three key areas are a lot more nuanced. Rather than specific areas of focus, we might think of them as the golden thread of safeguarding. They should weave themselves through

everything that we do.

**Internal Processes**—Ensure they're clear and published so that staff know they exist, and how to access them. Draw from data to identify gaps, themes or risk areas, but also to provide reassurance and assurance.

**Culture**—From the top down and across all levels. Good people flee from toxic environments. They often do so quietly. Rather than raising their concerns, they simply find another role with a more positive culture. Charities must recognise that safeguarding and protecting people from harm goes beyond simply implementing policies and processes. It's a fundamental responsibility for trustees, and safeguarding and protecting people must go to the heart of a charity's culture. By building up knowledge across organisations, charities can develop and strengthen organisational cultures that prioritise people's safety.

**Collaboration**—We must work with others to achieve our goals. Draw from the constructive criticism of our associates to help inform policies and strategies. Also use external reviews, but be mindful of their context—they're usually focused on just one theme, and they're short-term in

## Raising Safeguarding Standards in the Charity Sector

nature.

### **The Role of the Charity Commission**

Our role is to support charities and help them thrive. Here's how we try to fulfil our role:

**Monitoring and Supervising**—We have a wide range of powers. We can open a Statutory Inquiry, disqualify trustees, appoint interim managers, and set action plans.

**Guidance**—We publicise plenty of guidance and resources. For example, on October 22 2019 we updated our latest safeguarding guidance: "Safeguarding & Protecting People for Charities & Trustees."

**Response**—We actively respond to safeguarding issues, whether we identified them ourselves, or they were brought to our attention. We also work with charities on their safeguarding practice and assurance processes.

**Sharing Learning**—We deal with a lot of incidence and inquiries, and each one offers its own set of lessons. We always share our learning with the wider community. For example, Oxfam's recent safeguarding incident highlights the importance of early reporting of serious incidents, and the need to dispel certain

myths about such reporting.

### **Our Safeguarding Strategy**

Our safeguarding strategy stipulates that safeguarding should be a key governance priority for all charities regardless of size, type, or income. Safeguarding is everyone's responsibility—it's not just for those working with groups traditionally considered at-risk.

The Charity Commission is focused on the conduct of trustees and the steps they take to protect those that come into contact with the charity. We are clear that it is an essential duty for trustees to take reasonable steps to safeguard beneficiaries, staff, volunteers, and those who come into contact with the charity through its work. Essentially, a charity should be a safe and trusted environment.

### **The Role of Trustees**

Our publication "The Essential Trustee" outlines certain expectations we have for how trustees should conduct themselves. Our expectations include:

- Complying with the law relevant to safeguarding and protecting people (e.g. health and safety).
- Managing your charities resources responsibly—avoid exposing the

## Raising Safeguarding Standards in the Charity Sector

charity or its people to undue risk.

Assess and manage safeguarding risks, and fulfil your responsibilities to staff and volunteers.

- Act with reasonable care and skill. Take expert advice when you need to, and take prompt and appropriate action when things go wrong.

Our role often forms part of a much broader sphere involving other agencies. For example, it is the role of the police and social services to investigate actual abuse.

### We All Have A Part to Play

So in practice, whether you're a charity or a regulator, everyone has a role to play in

safeguarding.

If you're a trustee or a volunteer at a charity, your responsibilities are to your charity and your people. This is an important responsibility, and the public trusts you to do it well.

We, as regulators, are here to hold you to account. We cannot look after the safety of your people for you, and we do not investigate individual incidents for you.

Our regulatory role is to ensure that charities comply with legal duties, and that incidents are managed responsibly in accordance with the charity's policies and procedures.

Our role also involves ensuring that prompt steps are taken to protect the



CHARITY COMMISSION  
FOR ENGLAND AND WALES

## Requirements and Expectations

### Charities



Protect  
People



Report and deal  
with incidents  
and risks



Stop a repeat –  
improve

### Regulators



Hold charity to  
account (for actions  
and inactions)



Acting to protect  
public trust



Support with  
guidance

## Raising Safeguarding Standards in the Charity Sector

people affected by the safeguarding issue, and to prevent it from happening again. This means ensuring accountability, and where necessary, ensuring that the charity makes improvements to governance and internal controls.

Finally, we're here to ensure that you report incidents to us and to the police where necessary, and that any lessons learned by the charity regarding any systemic or individual failings are acted upon.

### **Safeguarding and Protecting People—Responsibilities**

For the Charity Commission, safeguarding previously focused on vulnerable beneficiaries. But our current safeguarding strategy makes it clear that our focus must be wider than this.

Safeguarding is about protecting everyone—children, young people, and adults at risk, yes. But also volunteers, employees, and even temporary visitors to premises.

At its most basic, we recognise four basic expectations that need to be met when it comes to safeguarding:

1. Providing a safe and trusted environment.
2. Setting the culture and the tone.
3. Having appropriate policies, processes and procedures.
4. Incident management.

### **How Does This Work in Practice?**

In early 2018, following the concerns around Oxfam, Kids Club and the RNIB, there was an increased focus on safeguarding in the charity sector. We responded to this in a number of ways.

In February 2018 we set up an interim taskforce to coordinate work relating to safeguarding, and to undertake a historic review of cases. We listened to feedback, and it soon became clear that there needs to be greater clarity on what safeguarding means. What should people report? We also endeavoured to work better with agencies and partners. We work with our Scottish and Northern Ireland counterparts, as well as the police, NCA, DFID, Home Office, DBS and DCMS.

### **Whistleblowing**

We also recognised the need to improve our approach to whistleblowing. We launched our dedicated advice line for charity whistleblowers on Monday 3 June 2019. You can reach this line on **0800 055 7214**. Callers receive confidential advice



## Raising Safeguarding Standards in the Charity Sector

to help them decide what to do about raising a serious concern about their charity, including whether and how to raise the concern with us.

This is part of our commitment to improving the confidence of individuals when facing what can otherwise be an isolating and difficult decision about speaking up. It's a pilot project, so we are monitoring and evaluating its impact on the experience of charity whistleblowers, and on the amount and quality of intelligence it gives us.

### **Common Issues Identified in Our Casework**

We come across certain common issues in our casework. Here are a few examples.

First is a failure to adequately identify safeguarding risks. Indeed, some trustees we encounter don't even recognise that their beneficiaries may fall within an at-risk group. For instance, in October 2017 we produced a thematic report on military charities. We found that certain charities that work with veterans who may be suffering from such mental health issues as PTSD hadn't considered this as a safeguarding risk. And as such, they hadn't considered what steps they needed to take to manage the risks.

Inadequate training and safeguarding skills is another common issue. We often find this issue with charities that are not set up within a well-regulated sector, but which end up working with at-risk people all the same. An example might be a local community centre, where frontline staff or volunteers may end up dealing with an incident.

We often see a poor or ineffective focus and line of sight on the part of trustees and leadership. For example, there could be inadequate or poor information flow through to trustees on issues relevant to safeguarding decision making and risk management. For safeguarding to work, you need clear lines of accountability and understanding of what needs reporting to the highest levels.

This sort of issue is often part of a wider issue with safeguarding policies. Poor safeguarding policies permit poor practice, which can lead to increased risk. For example, most charities run checks on their staff. But how many run checks on their trustees? And how many trustees have access to children or adults at risk?

Finally, we often see a lack of assurance and reassurance on the part of trustees.

## Raising Safeguarding Standards in the Charity Sector

For example, trustees might rest assured that a risk is being managed based on little more than verbal assurance. There are no checks, no challenges, and no use of data to provide reassurance. And as we've established, an overreliance on external inspections can leave blindspots in policy and practice.

### Reporting of Serious Incidents

The number of serious incidents being reported continues to rise, and more incidents of safeguarding are reported than any other serious incident. Of the 2,895 serious incidents reported in the 2018-2019 financial year, 64% were for safeguarding.

In the four months following the Oxfam incident (February–May 2018) we received just over 1,150 safeguarding RSIs. This is compared to just over 1,200 during the whole of 2016–2017, and just over 1,500 during 2017–2018.

We get around 50 RSIs a week. Even with the increase in reporting, fewer than 1.5% of the charities in our register are reporting. We see charities that don't report against their peers as high risk. Improved reporting will demonstrate that charities are on track, and that the sector is fit for the future.

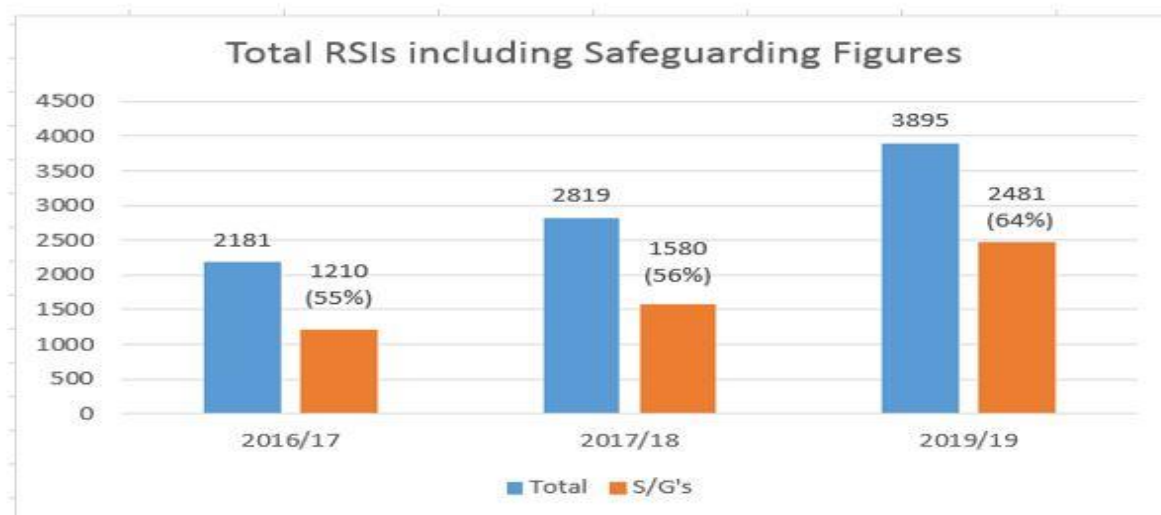
We've updated our RSI guidance and introduced a new digital tool for reporting.



CHARITY COMMISSION  
FOR ENGLAND AND WALES

## RSI reporting

**Safeguarding is largest type of Report of Serious Incident (RSI) we receive, with numbers rising:**



## Raising Safeguarding Standards in the Charity Sector

The new electronic system has ensured that the data required to review a serious incident is provided from the first instance. This has reduced the workload and the delays in responses and follow-up actions. It used to take around three rounds of correspondence to get the information required to assess an incident. In most cases, we can now gather all the information we need to act after just one round of correspondence. Our aim is to get data in a consistent format, so we can pick out trends to inform best practice for the sector as a whole.

### Why Report Serious Incidents

It's all about holding trustees to account. It's about ensuring that trustees have complied with their duties and taken appropriate steps to fix the issue. If we are concerned that they have not done this, we may have to provide regulatory advice and guidance, or even consider using one of our powers.

Reporting serious incidents also enables us to identify trends, and assess the sort of impact these might have on other charities. We can then use this information to improve the sector as a whole. For example, we once spotted a trend of reports about a certain type of

fraud targeting schools. This enabled us to issue an alert to all relevant charities.

### What Counts as a Serious Incident?

We define a serious incident as follows: An adverse event, whether actual or alleged, which results in or risks significant harm to your charity's beneficiaries, staff, volunteers or others who come into contact with your charity through its work. A serious incident might also result in loss of your charity's money or assets, damage to your charity's property, and harm to your charity's reputation.

Some in the third sector seem unsure about what they should and shouldn't report. As a general rule, you should report allegations made against you, your staff, or the charity as a whole. This isn't about reporting abuse you have become aware of in the course of your normal work. For example, if someone who has been abused at home contacts the charity's helpline for advice, it clearly isn't something you need to report to us.

We urge everyone in the third sector to use our new online tool for all reporting of serious incidents. An exception might be if you've made a separate agreement to make bulk reports to us. The threshold for this sort of arrangement is generally when

## Raising Safeguarding Standards in the Charity Sector

you need to make more than 10 reports in the space of a year.

### Expectations on Reporting

The important thing isn't the incident itself. It's your response. And to that end, we place certain expectations on charities that report serious incidents:

**Report as soon as possible.** Even if you are still investigating the incident and don't yet know the full outcome, you must still report the incident to us. If we do need to provide advice, it's better that we do so at the earliest possible opportunity. You can then provide us with an update once the outcome of the incident is known. And remember, the incident doesn't have to be proven before you report it.

### We expect openness and transparency.

Be prepared to give us ALL the information that's relevant to the case.

**Report to the police as well as us if the incident involves criminal activity.** There is specific guidance on how and when to report to the police when an incident happens overseas. In short, if the perpetrator is a British national, we may need to report to the UK police as well as to the local authorities. An example of when this might be necessary would be if the victim of sexual assault would

otherwise be at risk. But even in this situation, reporting needs to be a clearly justified decision.

### RSI Myths

Our experience has told us that many myths prevail when it comes to reporting serious incidents. Here are some of the common myths we've encountered:

**MYTH: Reporting a serious incident always results in us taking regulatory action against the charity.** In reality, we rarely exercise our strongest powers in response to RSIs. We're much more likely to take action when an incident has not been reported. The action we take is usually to offer advice or guidance, or to seek reassurance that your trustees are handling the incident.

### MYTH: We routinely disclose details of the RSIs received to the press and public.

This just isn't true. However, if the press is aware of a serious incident, they'll usually approach us for a statement. In this case, we may confirm that we've received an RSI. As far as we're concerned, if a charity's reported to us, it demonstrates that they're acting responsibly. But even then, we don't go into specific details about who's involved in the incident. Nor do we elaborate on exactly what's

## Raising Safeguarding Standards in the Charity Sector

happened.

### **MYTH: The RSI regime is not clear on what types of incident should be reported.**

Actually, the RSI guidance sets out clear principles on what type of incidents you should report. But our guidance is not exhaustive or too prescriptive, simply because the charity sector is so varied. What counts as a serious incident for a smaller charity may not be that significant for a larger charity. It's all about context and impact, as well as the specific nature of the incident. The guidance even includes a clear table giving examples of issues that should and should not be reported.

**MYTH: There's no need to report serious incidents involving partners the charity has funded.** There's no single answer to this question. Once again, it all goes back to the impact the incident has on the charity. If an incident involving a partner is so serious that you would have reported it had it happened in your charity, then you should think about reporting it. Also think about reputation. For example, if there's an international network of charities with the same name, and a very serious incident occurs in one of the charities, then it could have an impact on your

charity. The public probably wouldn't distinguish between you and the offending partner.

### **MYTH: You only need to report an incident if it appears in the media.**

Nothing could be further from the truth. Many incidents will need to be reported even if there is no media or public knowledge. But that said, there may be occasions when an incident in itself would not have met the reporting threshold, but the media has reported on it regardless. The media reporting may not be entirely accurate. In this case, it would be a good idea to report the incident to us, if only on the basis that the media interest itself may count as a serious incident for the charity.

### **Learning Lessons**

Our investigation of the 2018 Oxfam incident revealed six key lessons for the wider charity sector.

**Trustees are collectively responsible for their charity, and ultimately accountable for everything done by the charity and those representing the charity.** As a result, trustees must actively understand the risks to their charity, and make sure those risks are properly managed. The higher the risk, the greater the expectation



## Raising Safeguarding Standards in the Charity Sector

that must be placed on trustees, and the more oversight is needed. In a large and complex charity it's normal for the executive to have significant decision-making authority. But the trustees must still be willing and able to hold the executive to account.

**Protecting people from harm is not an overhead to be minimised.** Instead, protecting people from harm is a fundamental and integral part of operating as a charity for the public benefit. It should be a governance priority for all charities. As part of fulfilling their trustee duties, trustees must take reasonable steps to protect people who come into contact with their charity from harm.

**Failure to take reasonable steps to protect people cannot be excused by the difficult context a charity is working in.**

Nor can incidents of harm be justified in relation to the importance of the cause. Operating internationally, across multiple legal jurisdictions and cultural contexts while in the midst of a humanitarian crisis, is a profoundly complex endeavour. Lives depend on the work of UK charities, and the thousands of charity workers and volunteers around the world. Public

expectations of charities operating in this space are high precisely because of the critical importance of the work.

**Effective trustee boards lead by example.** They establish and take ownership of the charity's values. They set the standards and they model the behaviours that reflect these values. And they require anyone who represents the charity to reflect these values. Failures to protect people from harm should be identified. Lessons should be sought and learned. And there should be a commitment to full and frank disclosure to all relevant parties, including the regulators. There should be clear consequences for anyone whose conduct falls short of what is required, regardless of how senior they are in the charity.

**Raising concerns takes courage.** Those who raise concerns deserve to be taken seriously and treated with respect and sensitivity. Charities should make it clear how anyone can raise a concern, and there should be a proper process in place for listening to and assessing concerns raised by whistleblowers. Whistleblowers should always be informed of what's happened as a result of their report.

**The media matters, but other things**

## Raising Safeguarding Standards in the Charity Sector

**matter more.** If trustees simply focus on avoiding negative or critical media coverage in the wake of serious incidents, then they will not be fulfilling their duties to protect a charity's reputation. Nor will they be serving their shared responsibility to uphold the reputation of the charity as a whole. Dealing properly with incidents of harm to people, reporting them, and ensuring the lessons are learned and acted upon, will better protect the reputation of the charity in the long term. It means that donors, stakeholders and the wider public can take confidence in the knowledge that the charity operates with integrity while delivering on its charitable purpose.

### Summary of Lessons Learned

- Trustees must actively understand and manage risks.
- Protecting people and safeguarding responsibilities should be a governance priority for all charities.
- Particular complexities and expectations when operating internationally are certainly a factor, but they're not an excuse.
- Effective trustee boards and senior executives lead by example, through

setting and taking ownership of a charity's values.

- Those who raise concerns deserve to be taken seriously, and treated with respect and sensitivity.
- Dealing properly with incidents of harm will protect the charity's reputation in the long term.
- Public trust hinges not just on what you do, but on how you do it.

As the final line of the wider lessons section of our Oxfam report states:

"Charities must never lose sight of why they exist—including how they respond when things go wrong."

**This article was adapted from a presentation given at the 2019 ACT Safeguarding Seminar by Catherine Edginton.**

**You can read the full guidance on reporting a serious incident to the charity commission [here](#).**

## Self-Care & Self-Neglect—An Overlooked Aspect of Safeguarding?

**Kate Spicer, writer, documentary maker and journalist.**



**My brother Tom is 48 years old. He has a severe learning disability caused by the inherited Fragile X Syndrome.**

As a child he was lean and hyperactive. Throughout his adulthood, as he calmed down and found his feet in a wonderful community, he retained a lean to leanish physique. Then his residential care home was closed and he moved to a suburban home where he could have more acceptable care set up with only a few other learning disabled people and support. Something more like a normal home and not like the big sociable commune he once lived in. We were meant to be pleased about this and in many ways we were, Tom absolutely loved

his new home. He had a little self contained flat and this made him feel normal and the silence and independence felt good to him.

There is a problem though, one that has me waking up in the night holding my chest in fear, guilt and overwhelming love for my vulnerable brother, it makes me lose my temper with my Mum when we discuss it because I am so frustrated. It's something that could be fixed so easily but without a far higher level of personal assistance it feels impossible to achieve.

Tom is obese. The worst kind of obese with a hard round stomach that suggests an inflamed gut and the dangerous visceral

## Self-Care & Self-Neglect—An Overlooked Aspect of Safeguarding?

**Kate Spicer, writer, documentary maker and journalist.**

fat around his organs. Tom's diet and exercise requires motivation and enlightened management. As his family we no longer have that agency over his life, he enjoys pints and pies and fish and chips and with what little money he has he wanders off and treats himself every afternoon.

Self care has always been a complex thing for Tom, I will sometimes clean the thick black gunk from his ears that no one has touched for months, or I will see his long thin spindly Howard Hughes like toenails.

Tom's new residential set up is facilitated by a group of warm and wonderful ladies, I don't want to complain about them. I just want to tell anyone reading this that the management and maintenance of Tom's body is out of the control of those that love him deeply, his family, and beyond the real

ability of his well-intended and deeply caring care workers who are already stretched.

Over six months ago I had a long conversation with his social worker about this. She agreed it was a problem. What's happened. Precisely zilch.

Tom doesn't want his big sister bossing him about but my God if I was a millionaire and could pay for more attention for Tom, and some of the expert nutritional and pampering services the rich people in my London neighbourhood take for granted. My God, I would. He needs it far far more than they do.

**Kate Spicer is a writer, documentary maker and journalist. She made a film about her brother Tom called Mission to Lars.**



## Safeguarding Children in Nigeria

**Osinfowokan Omosalewa Grace, Program Officer Child Protection and Gender**

### **Safeguarding in Nigeria is an emerging field in child protection.**

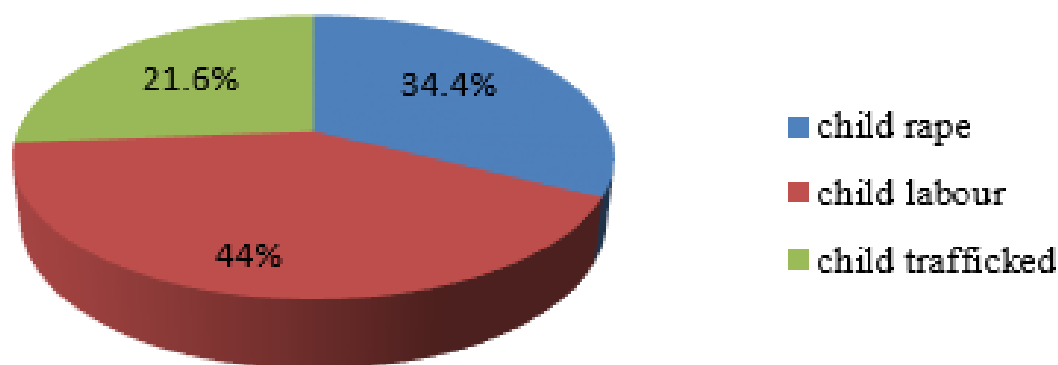
Nigeria is a signatory to the Convention on the Right of Child (CRC), yet the law has been a barking law, and not a biting law. We live in an 'Every man for himself' sort of environment. 'The society' that constitutes the families, neighbours, friends, and landlords act nonchalantly and feel unconcerned about child safeguarding.

Every parent tries to shield their children from associating with families whose children have been victimised. They believe that since it didn't happen to their children, why should they care about

others? This way of thinking has crept into the community like a virus. 'The community' also has a larger share of the blame. Rather than protecting, fighting and supporting families or children that are vulnerable, they turn a blind eye. This 'Act' has lead us nowhere. Indeed, it has made our children more vulnerable to harm, increasing the incidence rate of abuses and neglect among children.

**What is child safeguarding?** It is a deliberate response to any attack that could harm a child. It can also be defined as protecting children from maltreatment, or preventing the deterioration of

### **Percentage distributon of children abused**





## Safeguarding Children in Nigeria

**Osinfowokan Omosalewa Grace, Program Officer Child Protection and Gender**

children's health or development. It's about ensuring that children are growing up in circumstances consistent with the provision of safe and effective care. Child safeguarding can also refer to the policies and practices employed by government bodies to keep children safe and promote their wellbeing. In the past decade, several NGOs have emerged to address and advocate for child safeguard policies. They use a range of techniques, including media advocacy, public forums, public awareness campaigns, community mobilisation, and policy analysis and research. These actions have awoken the government to the importance of enforcing policies that will ensure the safety of the children.

**Who is a child?** According to The United Nations, a child is anyone under the age of 18. The child rights law stipulates that every child has the right to survive, develop, and participate actively. Children are the most vulnerable individuals in our society. They are vulnerable to abuses such as sexual abuse, physical abuse, emotional abuse and neglect. Other widespread issues include discrimination, child labour, and exploitation. All of these can impact

negatively on their physical, social, emotional and mental wellbeing. The 2018 report from the Population Bureau of Statistics revealed that over 44% consist of children under age 18 years. 34.4% of children are victims of sexual abuse, out of which 31.4% are girls and 3% are boys. About 44% of children aged 5–17 are out of school and involved in child labour. 21.6% of children are trafficked.

### **Cultural Barriers to Child Safeguarding**

Nigeria is a country with a diverse ethnic and cultural background that cuts across different tribes and regions in the state. The unique attributes of each tribe is inherited from their ancestral culture. These attributes have informed their values, beliefs and perceptions regarding marriage, childbearing, lifestyle, food, and so on.

Nigerian culture encourages marriage and procreation. The system of marriage commonly practiced is polygamous, which encourages men to marry more than one wife. This system of marriage is most prominent in the northern part of Nigeria, but it's not practiced so much in the western, southern, and eastern parts

## Safeguarding Children in Nigeria

**Osinfowokan Omosalewa Grace, Program Officer Child Protection and Gender**

of the country. Many northern Nigerians believe that bearing children affords them the rights to use their children as labourers to work for themselves and for other people—especially male children. In western Nigeria, some men marry multiple wives basically so they can bear more children. They believe that more children means more money. In southern parts of Nigeria we see children trafficked as sex workers.

### **Passive Law, Not Active Law**

Over the years, numerous laws have been passed by our legislators intended to enshrine child safeguarding on a local and international level. More laws are in the pipeline. But the question is not how far, but how well have these laws helped? For instance, Nigeria ratified the United Nations Convention on the Rights of Persons with Disabilities Act (CRPD) 2007, and its optional protocol in 2010. Since then, civil society groups and people with disabilities have called on the government to put it into action. But it wasn't until 2018 that President Buhari signed the Discrimination Against Persons with Disabilities (Prohibition) Act into law. It took

nine years of dogged advocacy by disabled rights groups and activists to achieve the milestone. It raises the question: What's the use of a law if it's not backed up with action? It creates a state of lawlessness where safety is promised, but not enforced. Offenders go unpunished, cases are swept under the carpet, and the vicious circle of abuse continues.

### **Poor Development in the Local Government.**

Local government (LG) is the third tier of government. It's one of the most important arms of the government, because of its connection to the grassroots. But it's poorly developed. Nigeria is one of the few African countries that adopted a federal system of government. It's a system that envisages autonomy for every sect of its authorities. Unfortunately, to suit their interests and political agenda, the federal and state governments maintain great levels of influence and control over local authorities. This results in ineffectiveness and poor performance. The local government is the heart of the community. It interfaces directly with the

## Safeguarding Children in Nigeria

**Osinfowokan Omosalewa Grace, Program Officer Child Protection and Gender**

people in ensuring that quality services and good governance is delivered with efficiency. But our local governments are characterised by a lack of institutions and agencies in providing services to the people. For instance, the Mushin local government is the fourth largest in the country, with a population of 664,000. Out of the 20 local governments in the Lagos state, it's considered one of the most vulnerable. There is a high prevalence of abuse, rape, juvenile delinquency, and other issues. There are no standard institutions, orphanages and homes for young offenders. As it stands, we have fewer than three government-owned homes in this local government, and the so-called correctional homes are overcrowded and full of structural defects. There is no safer haven for these children. Though a few NGOs provide shelter for children, their contribution is limited, as many of them are facing constraints.

### **Conclusion**

Safeguarding is everybody's business. We need to be deliberate, responsive, and take action. This can only be achieved through a collaborative effort by families,

community leaders, agencies, NGOs, policy-makers and other relevant stakeholders. The roles and responsibilities of the family when it comes to safeguarding children cannot be overemphasised. Many different groups and organisations need to come together to help drive change. We need to educate both caregivers and household heads on the importance of birth control and better parenting. On the other hand, a nation will only thrive and survive when laws and policies are executed, monitored, and enforced. To this end, our government should realise that it is their responsibility to ensure that the law is followed to the letter. They should also be aware that their inefficiencies in enforcing law will put the nation in a state of backwardness. Whether we like it or not, if we neglect our safeguarding responsibilities, there will be consequences on a societal level. If things don't change, we could jeopardise the future of our children.

**This article was submitted by  
Omosalewa Grace, Program Officer, Child  
Protection and Gender.**

**You can contact Omosalewa on  
[Olabosipo2016@gmail.com](mailto:Olabosipo2016@gmail.com)**

## Farewell From Ieuan Watkins, Our Safeguarding Adults in Sport Manager for Wales



**Well, this is my last blog for the Ann Craft Trust as I am leaving the first week of January.**

I have really mixed feelings as ACT is a wonderful organisation to work for. They're making a real difference operationally and strategically, not just in safeguarding adults in sport, but also in many other areas of safeguarding. So I'm sad to go; but on a personal level I'm happy that I can take a change in direction.

Perhaps I can even spend a bit more time away from the laptop!

### **Changing Terminology**

So I thought I would reflect on what we have achieved with Adults at Risk support for Welsh Sports in the last year. Well, the biggest, and most important win for me, is changing the terminology in ordinary language from 'Vulnerable Adults' to 'Adults at Risk'.

The legislation changed here in 2014, and we should no longer be using the old terminology. It's perceived by some as demeaning and restrictive. It's important that we recognise that we all perhaps have vulnerabilities that could lead to us becoming an Adult at Risk (AAR). We have a duty of care to everyone within our organisations.

### **Safeguarding Training**

To that end, I ran multiple training workshops across Wales. Whether operationally or strategically, I have found everyone receptive and enthusiastic. Everyone seems keen to develop understanding of what AAR means, and how we should recognise and support people.

I have lost count of how many times I have suggested that we 'make safeguarding personal'. My oft repeated catchphrase is 'Nothing About Me Without Me'. I really hope that this work has

started to change the culture, the understanding, and the language we use.

As well as supporting six NGBs to create and implement AAR policies, we have two NGBs nearly there, with four others pending. There is still lots to do, but it's a great start. In addition to the usual sports, we have also been able to support or link with:

- **Cartref Ni** – Not for profit charity based in St Asaph working with adults with learning difficulties who live at home.
- **Ospreys Rugby** – Extensive community-based foundation scheme.
- **Cardiff City Football Club Community Foundation** – Community based foundation scheme.
- **Community Leisure UK** – members' association that specialises in charitable trusts delivering public leisure and culture services across the UK.
- **Swansea City Football Club.**
- **WCVA (Wales Council for Voluntary Action)** – supporting third sector and voluntary organisations.
- **Wrexham Football Club.**
- **WSA (Welsh Sports Association)** – Independent membership body supporting Welsh NGBs.

Alongside the 'policy stuff', I have also been able to advise a number of sports colleagues across Wales on case management for AAR. It's great that sports are starting to think about this. They're recognising AAR issues and putting policy into practice.

The greatest win has to be The Welsh Sport Safeguarding Hub. This involves close working relationships between our NSPCC Child Protection in Sport Unit colleagues, Laura Whapham and Cerri Dando, and our approach with Statutory Agencies. We often hear talk about the lack of joint working and information sharing where there are overlapping adult/child protection matters.

This year we presented at a number of key statutory meetings, including regional Safeguarding Boards. Importantly, we also worked with MAPPA – the arrangements used to manage sexual and violent offenders.

We plan to send out Hub posters in the New Year. They are designed to signpost the police, the social services and others to sports through the ACT and CPSU. We hope this will make a real difference to protecting people in sport.

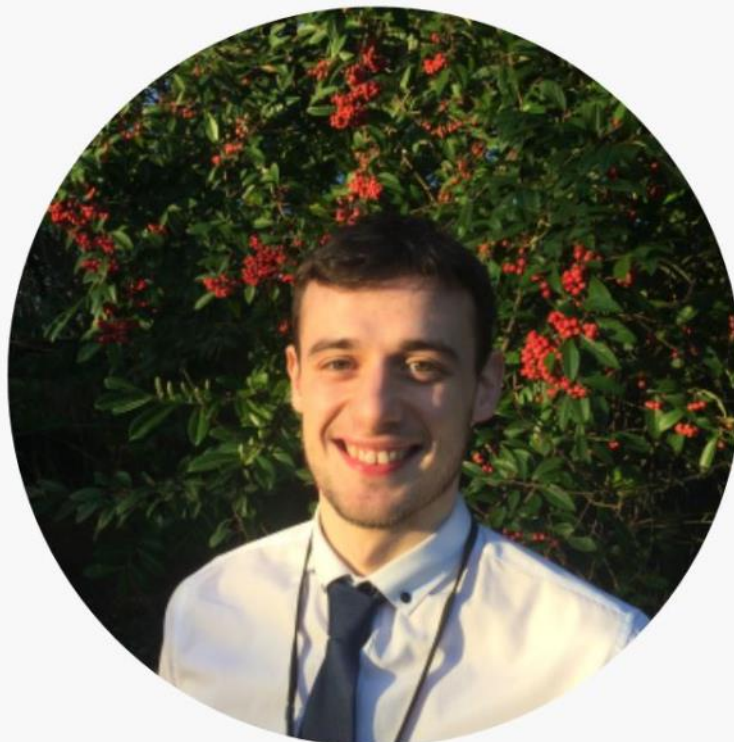
I have learned so much over the last year. I hope that my experience and hard work has added value to Welsh Sport NGBs. Thank you to all of you for that support.

Finally, a genuine and heartfelt thank you to Laura and Cerri from the CPSU. We have shared phone, desk and working environment. You are truly professional and Welsh sport is very lucky to have you. I'd also like to thank all my colleagues at ACT, and to wish them all the best for the future.

**Diolch yn fawr iawn.**



# Meet Richard, Our New Safeguarding Adults in Sport Admin



**I am excited to start as Safeguarding Adults in Sport Administrator for the Ann Craft Trust, which is a new role funded by Sport England.**

I have completed a postgraduate degree in Sports Coaching at Loughborough University, and specialised in research which focused upon on coaches' opinions on the effectiveness of National Governing Bodies and their ability to impact the participation level in sport. Whilst at Loughborough I also coached the Women's University football team. I have gained various coaching and referee qualifications and have refereed for Boccia Basketball and football.

Prior to working at ACT, I have worked at Nottingham Trent University within the sport

department in an administration role. I have also held positions in the Nottingham College Clifton campus.

Alongside my role at the Ann Craft Trust, I also coach Notts County Women U15's, and am the Junior Welfare Officer for the women's section.

I am passionate about NGB effectiveness and how that can impact on welfare. I would like to help make welfare a more active priority within the sport field, and I feel I can offer a grassroots insight into how ACT could support this.

I am looking forward to continuing the great work ACT does for sport and activity. I look forward to meeting everyone I will be working with over the coming months.

## ACT Collaborate With UK Coaching on Safeguarding Resources



### **We've collaborated with UK Coaching to produce a suite of safeguarding adults resources.**

Everyone involved in sports, from coaches to volunteers, has a legal and moral responsibility to commit to safeguarding. The resources offer advice and guidance on some of the major issues underpinning safeguarding adults.

[You can access the resources here.](#)

Please note that some of the resources are exclusively available to UK Coaching subscribers. However, you'll find several more safeguarding guides on the UK Coaching site.

**How to act to safeguard adults at risk:** Would you know what to do if you

are worried about the safety or welfare of a person you coach? Here is some advice on dealing with sensitive safeguarding situations. [Access it here.](#)

**The four Rs of safeguarding adults:** If you can remember and implement these 'Four Rs', you can be confident you will be supporting an adult who may have safeguarding needs in the appropriate manner. [Learn more.](#)

**Online safeguarding training:** This online course will give you the knowledge and confidence to safeguard adults at your sessions, including those identified as 'at risk'. You'll learn how to create a safe environment so that all adults can enjoy sport and physical activity. [Access it here.](#)

## Job Vacancy—Head of NSPCC CPSU



### Child Protection in Sport Unit

**An exciting opportunity has arisen for an exceptional candidate to lead the NSPCC Child Protection in Sport Unit (CPSU). This position will be located in either the London or Leicester base.**

In this role, you will need to have the knowledge and experience to take forward the strategic direction of an established service. The CPSU is at an exciting time in its journey and the NSPCC are looking for a leader who is able to manage existing relationships with key partners and who has the vision to take the unit forward to meet the new challenges the unit and the sector face.

The right candidate will have a sound understanding and experience of safeguarding and child protection and will understand the landscape of the sports sector. In this role, you will be leading a team of experienced multidisciplinary

safeguarding professionals across the UK as well as giving safeguarding support to major funders and key partners across the sports sector. It is therefore important that your knowledge and experience brings with it the credibility to be able to work and take decisions at this level.

This is an important strategic appointment for the NSPCC to a respected service at an exciting juncture of its journey. Apply today if you want to work with the NSPCC to make a real difference in keeping children and young people safe from abuse.

For full details of the role, and information on how to apply, [head to our website](#).

## Safeguarding News Watch:

# Safeguarding Children and Young People

### **Have We Overcomplicated Safeguarding and Created a Self-Serving Industry?**

8 November 2019 | [ChildProtectionProfessionals.org.uk](https://ChildProtectionProfessionals.org.uk)

### **Rochester diocese to re-examine past child abuse concerns**

5 December 2019 | [KentOnline.co.uk](https://KentOnline.co.uk)

### **CSE & Exploitation Team Structure—Police force exploitation leads weigh-in**

January 2020 | [NWGNetwork.org](https://NWGNetwork.org)

### **Root-and-branch review of care system “must not be delayed”**

January 15 2020 | [CommunityCare.co.uk](https://CommunityCare.co.uk)

### **Medway council must lose “piecemeal” approach to social work**

13 January 2020 | [CommunityCare.co.uk](https://CommunityCare.co.uk)

### **What I Wish I’d Been Told Earlier About How to Manage Sensory Overloads**

6 January 2020 | [LearningDisabilityToday.co.uk](https://LearningDisabilityToday.co.uk)

### **Children in out-of-area residential care “feel let down” by social workers**

24 December 2019 | [CommunityCare.co.uk](https://CommunityCare.co.uk)

## Safeguarding News Watch:

# Safeguarding Adults at Risk

**10 people with learning disabilities or autism dies in hospitals in past year**

14 January 2020 | [news.sky.com](https://news.sky.com)

**Parents “kept in the dark” over daughter in adult psychiatric unit**

8 November 2019 | [BBC.co.uk](https://www.bbc.co.uk)

**A “no-go zone” for financial scammers**

6 November 2019 | [CommunityCare.co.uk](https://www.communitycare.co.uk)

**Woman who inherited Huntington’s disease gene sues NHS**

18 November 2019 | [BBC.co.uk](https://www.bbc.co.uk)

**Self-Neglect—A Complex and Challenging Issue**

20 November 2019 | [TimesandStar.co.uk](https://www.timesandstar.co.uk)

**Potential modern slavery victim moved to safe place after police raids in Cheshire**

November 2019 | [Cheshire-Live.co.uk](https://www.cheshire-live.co.uk)

**Doorstep scams “linked to modern slavery”**

27 November 2019 | [BBC.co.uk](https://www.bbc.co.uk)



## Safeguarding News Watch:

# Safeguarding Adults in Sport and Activity

### **Safeguarding Elite Athletes in Sport—Podcast**

4 December 2020 | [AnnCraftTrust.org](https://www.anncrafttrust.org)

### **ACT & The CPSU—Working Together to Safeguard Adults in Sport—Podcast**

9 December 2020 | [AnnCraftTrust.org](https://www.anncrafttrust.org)

### **Toxic environment “pressured athlete into weight loss”**

12 November 2019 | [AnnCraftTrust.org](https://www.anncrafttrust.org)

### **How the founder of Bikram yoga “built an empire on abuse”**

20 November 2019 | [TheGuardian.com](https://www.theguardian.com)

### **CALM Football Collective—Meet AFC Oldsmiths**

30 July 2019 | [TheCalmZone.net](https://www.thecalmzone.net)

### **How sports helps survivors of violence against women and girls**

14 November 2019 | [GiveMeSport.com](https://www.givemesport.com)

### **New European Commission study on safeguarding Children in Sport**

22 October 2019 | [SportandDev.org](https://www.sportanddev.org)

# Safeguarding Research and Resources

## A Simple Guide to the Human Rights Act 1998

Essential summary by Leigh Day.

*You have probably heard the mention of 'human rights' somewhere in the media before. But have you ever learned the ins and outs of what the term truly means?*

Access it here: <https://www.lexology.com/library/detail.aspx?g=cd025266-1514-4be3-bbef-6b129e91d40c>

## More About Me: My Autism Diagnosis

An in-depth guide describing the practicalities of introducing a child or young person to their autism diagnosis.

Get your guide here: <http://www.jkp.com/jkpblog/2019/11/autism-diagnosis-2/>

## Hate Crime: A Guide For Those Affected

The guide's focus is antisemitism and anti-Muslim hatred. Its advice can, and should, be used by anybody who has suffered any kind of hate crime, which can occur due to race, religion, sexuality, age, disability, gender or any other characteristic.

Read it here: [http://www.report-it.org.uk/files/hate\\_crime\\_-\\_a\\_guide\\_for\\_those\\_affected\\_1503330449\\_1.pdf](http://www.report-it.org.uk/files/hate_crime_-_a_guide_for_those_affected_1503330449_1.pdf)

# Safeguarding Research and Resources

## **Positive Behavioural Support—An Information Pack for Family Carers**

“If you've never heard of PBS before, this is the place to start. This resource will help you understand what PBS is and offers links to other sources of information to develop your knowledge.”

Read the guide here: <https://www.challengingbehaviour.org.uk/understanding-behaviour/pbsguidesforfamilies.html>

## **Cuckooing—Criminal Exploitation Including County Lines**

A report from Surrey Police anti-social behaviour manager Jo Grimshaw.

Access it here: <https://www.nwgnetwork.org/cuckooing-criminal-exploitation-including-county-lines-from-surrey-police-anti-social-behaviour-manager-jo-grimshaw/>

## **Right From the Start—A Guide to Autism in the Early Years**

This practical toolkit contains a wealth of straightforward information in one place to guide parents and carers through their child's journey in the early years.

From the autism assessment process to the first day of school, this toolkit is packed with practical tips and checklists to support parents during the earliest years of their child's life. It also provides signposts to sources of support or additional information.

Download the free toolkit here: <https://www.ambitiousaboutautism.org.uk/right-from-the-start>

# Safeguarding Research and Resources

## **Trauma, Challenging Behaviour and Restrictive Intervention in Schools**

This policy briefing summarises the available evidence for associations between trauma, challenging behaviour and restrictive interventions in educational settings and considers alternative approaches for policymakers and school leaders.

Find it here: [https://www.centreformentalhealth.org.uk/sites/default/files/2020-01/Briefing\\_54\\_traumainformed%20schools\\_0.pdf](https://www.centreformentalhealth.org.uk/sites/default/files/2020-01/Briefing_54_traumainformed%20schools_0.pdf)

## **Learning Disabilities and Loneliness**

People with a learning disability are seven times as likely as their non-disabled peers to be lonely, according to research from Mencap, the UK's leading learning disability charity. This Christmas the charity is calling for urgent action to be taken to tackle the loneliness epidemic faced by people with a learning disability.

Read the report here: <http://www.hopeforjustice.review/>

## **Mapping Current Research Into CSA**

The CSA Centre has identified that there is a significant level of research activity on topics related to child sexual abuse across a range of disciplines. However, there is a lack of coordination across the field. This risks duplication, wasted resources and missed opportunities for shared learning and collaboration.

Read more: <https://www.csacentre.org.uk/resources/mapping-research>

## From the Vault: “People’s Lives Are Made a Misery”

By Donna Burton, Issue 47; April 2004

**The lives of people with learning disabilities are being made a misery by bullies who taunt them because they are different. But now a new scheme has been launched to help people with learning disabilities avoid the worst of the insults and encourage the rest of us to be more tolerant.**

The simple things in life do not come that easily to Cathy Baxter. She has a learning disability called dyspraxia, which makes her a little clumsy, and she finds it hard to read and write. In shops, or on the bus, it will take her longer to do the things we all take for granted. She might keep the queue waiting while she counts her money. Cathy is hesitant in the supermarket because she does not choose her groceries from the name on the packet, but by the pictures and the colours on the tins. She does not whiz through the checkout as fast as many of us would either. And now and again you can catch a glimpse of just how hard she tries to fit in from the concentration on her face, or the frustration she shows if she cannot express herself very well. But none of that matters to the people who have bullied her ever since she went to school.

Cathy has a learning disability which is defined as “intellectual impairment since birth”, but the bullies’ casual insults and nasty

remarks hurt her just as much as the smartest person.

“For me it is people who say, why can’t you do this or that. They call me stupid, or a mental case, or a freak. But I know people who are abused because of the way they look and they are bullied whenever they go out. People’s

“

*We are not freaks. We just have a disability.*

”

lives are made a misery.”

When Cathy, who is now 50, talks about bullying, she becomes angry and sometimes tears well up in her eyes. She knows how she may appear to other people and her voice is thick with the frustration of someone who also knows that there is only so much she can do about it.

“It is odd to have a learning disability. But we are not stupid,” she said. “We have feelings like everyone else. It is about time other people in the community realised that. It is just sheer ignorance. We are not freaks. We just have a disability.”

Cathy says the taunts have a profound effect



## From the Vault: “People’s Lives Are Made a Misery”

By Donna Burton, Issue 47; April 2004

on her and her friends. “When you get picked on and called a freak you don’t want to go out. I don’t like going shopping if I don’t know the store. You build up a wall around you.”

“

*The abuse dished out by children is very disturbing.*

”

But she is fighting back by participating in a project funded by the Nottingham City, Gedling and Broxtowe and Hucknall Primary Care Trusts. It aims to reduce bullying and help people with learning difficulties to protect themselves.

The scheme is called “Smile, No Bullying”. It aims to train care workers to spot the signs of bullying, and recommends how to ensure it is not happening within care services. It is part of a £1m project funded by the National Lottery to assist people with learning difficulties in Greater Nottingham.

Project worker Donna Burton has also produced a training course to be used with other organisations, such as schools, to teach younger people about the difficulties some people face.

In the last year, Ms. Burton has spoken to many disabled people and she has come across a wide variety of worrying incidents. “I would say bullying is a widespread problem”, she said. “People with learning disabilities have been shut away in the past in hospitals. But now the Government is saying we are going to include these people in the community. However, the community does not know how to deal with them. But that is no excuse.”

Ms. Burton said the abuse can range from cross words from the overworked care workers, to snide remarks from members of the public, to taunts from school children. She said the abuse dished out by children is “very disturbing. One of the aims of the project is to work more closely with schools and get them involved.”

One idea is to circulate an education video to Nottinghamshire schools and arrange for care workers and disabled people to visit. A pilot scheme has already taken place.

Ms. Burton is also organising a course for Nottingham City Transport to educate bus drivers about disabilities, and to tell them how they can help if they see bullying on their bus. The project will benefit some of the 10,000 people with learning disabilities who live in the South Nottingham area.

## **From the Vault: “People’s Lives Are Made a Misery”**

**By Donna Burton**, Issue 47; April 2004

“The aim is to ensure that everybody realises that tackling bullying is their responsibility, from social services to health workers and the public at large,” said Ms. Burton. “There will also be courses for disabled people themselves. Many people with learning disabilities have been through a lot. Some have suffered sexual and physical abuse, and the impact of bullying on them can be worse than it may be on other people. We want to help them build their confidence and self-esteem, and help them set up anti-bullying groups so they can offer each other support, as well as show them who they can turn to for help.”

A previous study of people with learning disabilities in Nottingham found that bullying is the issue they are most concerned about. Maggie Harty, Service Manager for People with Learning Disabilities at Nottingham City Council, said: “Given how important this issue is, we are delighted this programme is going ahead. The important thing is to get it into the wider community. That will be the hardest job. If we can get it into schools and inform the younger generation, that will make a big difference. But this is a long-term initiative.

### **Teaching Pupils About the Problem of Learning Disabilities**

Youngsters who have met adults with learning disabilities through a school project say they

would in future step up to defend them against bullies.

10 teenagers at the Henry Mellish School in Bulwell took part in the scheme and got to know people with learning difficulties at the nearby Bestwood Community Centre.

Ashlie Fletcher, 15, said: “The project went really well. I did not know much about learning disabilities until these people came to our school and we went to visit them at the community centre. It makes you think and not to judge people on their appearance. I don’t think there would be so much bullying if people knew more about learning difficulties. If I saw bullying take place now, I would try to stop it.

The sessions included teamwork activities, and opportunities for participants to share their experiences of bullying. Many Nottinghamshire schools are in the same neighbourhood at community centres, and pupils often direct hurtful comments at the people who attend them,

The Smile, No Bullying project aims to assist more schools in following the example set out by Henry Mellish School in working with community centres to teach children about learning disabilities.

Peter McConnochie, who runs the Social,

## From the Vault: “People’s Lives Are Made a Misery”

By Donna Burton, Issue 47; April 2004

Personal and Academic Centre at the School,  
said: “Both the students and the adults were  
quite worrying about meeting up. But once  
the barriers were down it went well.

“It changed the students’ thinking. They now  
acknowledge the adults from the community  
centre in the street when they see them.  
Ignorance is one of the main reasons for  
ridicule, and this sort of approach could be  
very beneficial if adopted by other schools.”

**Bullying**, by Barry Barrs (October 2003)

*Bullying is cowardly  
It is also wrong  
So listen all you bullies  
To my song.*

*Bullies laugh at people  
Who are disabled or are blind  
No-one should laugh aloud  
To people of that kind.*

*Bullies are people  
We don’t want around  
They’ll only land in trouble  
With the law; I’ll be bound.*

*So before you bully,  
Listen to my song.  
Do not tease disabled people  
Bullying is wrong.*

## **Ann Craft Trust**

Centre for Social Work  
University of Nottingham  
NG7 2RD

0115 951 5400

[ann-craft-trust@nottingham.ac.uk](mailto:ann-craft-trust@nottingham.ac.uk)



**[anncrafttrust.org](http://anncrafttrust.org)**

Everyone has a right to be treated with respect and dignity.  
Everyone deserves to be safe.