

CRUMBS

Training for independence

CRUMBS SAFEGUARDING POLICY & PROCEDURES

Revised April 2022 Version 3

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SECTION 1 POLICIES

1. INTRODUCTION

- 1.1. The CRUMBS Project is a charitable foundation dedicated to supporting adults with learning and mental health disabilities by providing learning and development opportunities to develop professional and life skills to support their transition to independent living and employment.
- 1.2. The aim of this document is to set out the policies and procedures of the CRUMBS Project to ensure that all individuals, especially those vulnerable adults ⁽¹⁾, who may be staff, trainees and volunteers, are protected and safeguarded within the range of the CRUMBS services and activities. ⁽²⁾

2. POLICY STATEMENT

- 2.1. The CRUMBS Project as an organisation is committed to the protection of all vulnerable individuals, with a special interest in vulnerable adults, and regards the safeguarding and promoting of the interests and wellbeing of all individuals and vulnerable adults as of paramount concern.
- 2.2. The CRUMBS project manages, delivers, and has direct responsibility for the delivery of training and other services to vulnerable adults, therefore our staff and volunteers come into contact with vulnerable adults within the context of our programmes and work.
- 2.3. The purpose of this policy is to outline the duty and responsibility of staff and volunteers, that includes Trustees, working on behalf of the organisation in relation to Safeguarding Vulnerable Adults.
- 2.4. All adults have the right to be safe from harm and must be able to live free from fear of abuse, neglect and exploitation.
- 2.5. Abuse of a vulnerable adult may consist of a single act or repeated acts. It may occur as a result of a failure to undertake action or appropriate care tasks. It may be an act of neglect or an omission to act, or it may occur where a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not, or cannot, consent.
- 2.6. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the individual. Concerns about abuse may be raised and reported to the regulatory body as a result of a single incident or repeated incidents of abuse.

¹ See definitions at Section 2 Section7

² See also BCP Multi-Agency Adult Safeguarding (2005) Resources Hub <https://resources.crums.org.uk/resources/crums-safeguarding-policies>

- 2.7. Anyone who has concerns about poor care standards and neglect in a care setting may raise these within the service, with the regulatory body and/or with the social services agency.

3. SCOPE

- 3.1. This policy applies to all staff, volunteers, Trustees, or anyone representing The CRUMBS Project. The purpose is:
 - 3.1.1. To protect vulnerable adults who receive The CRUMBS Project services.
 - 3.1.2. To provide staff and volunteers with the overarching principles guiding our approach to safeguarding.
 - 3.1.3. The CRUMBS project believes that no individual should ever experience abuse of any kind. We have a responsibility to promote the welfare of all vulnerable adults and to keep them safe. We are committed to work in a way that protects them.
 - 3.1.4. We consider it the duty of all those employed or involved with the organisation to safeguard the welfare of all individuals including vulnerable adults we work with by protecting them from physical, sexual or emotional abuse, including reporting any abuse discovered or suspected.
 - 3.1.5. To ensure effective safeguarding arrangements in all areas, and that The CRUMBS Project approach to safeguarding is aligned with statutory guidance and underpinned by two key principles:
 1. That safeguarding is everyone's responsibility and that each CRUMBS Project employee or representative should play their full part.
 2. That for vulnerable adults the approach should be based on a clear understanding of the needs and views of the individual.

4. THE ROLE OF THE DESIGNATED VULNERABLE ADULT PROTECTION OFFICER

- 4.1. The role of the designated officer is to deal with all instances involving adult protection that arise within the organisation. They will respond to all vulnerable adult protection concerns and enquiries.
- 4.2. The designated Vulnerable Adult Protection Lead for the organisation is *Ursula Boardman, Training and Development Manager and Head of Centre*. Should you have any suspicions or concerns relating to Adult Protection, contact Ursula Boardman.
- 4.3. Training will be provided, as appropriate, to ensure that staff are aware of these procedures. Specialist training will be provided for the member of staff with vulnerable adult protection responsibilities.

5. SAFEGUARDING VULNERABLE GROUPS

- 5.1. This policy is designed to meet our safeguarding commitment by ensuring that:
 - 5.1.1. Those who are known to be unsuitable do not gain access to vulnerable adults.
 - 5.1.2. Those who become unsuitable are detected at the earliest stage and prevented from continuing to work with those vulnerable.
 - 5.1.3. Those who intend to do harm are prevented at every possible stage from entering the workforce.
 - 5.1.4. Those who are identified as being at risk of abuse are afforded every practicable protection by The CRUMBS project.
 - 5.1.5. Those we discover are being abused are afforded the relevant protection and assistance by the relevant bodies as soon as practicably possible.
- 5.2. We will seek to keep all individuals safe by:
 - 5.2.1. Valuing, listening to and respecting all individuals.
 - 5.2.2. Appointing a designated vulnerable adult protection lead.
 - 5.2.3. Adopting guidelines and safeguarding practices through procedures and a code of conduct for staff and volunteers.
 - 5.2.4. Providing effective support to staff and volunteers through supervision and training.
 - 5.2.5. Recruiting staff and volunteers safely, ensuring all necessary checks are made.
 - 5.2.6. Recording and storing information professionally and securely and sharing information about safeguarding and good practice with staff and volunteers.
 - 5.2.7. Sharing information about concerns with agencies who need to know and involving parents and those vulnerable appropriately.
 - 5.2.8. Using our procedures to manage any allegations against staff and volunteers appropriately.

6. THE ROLE OF STAFF AND VOLUNTEERS

- 6.1. All staff, trustees, and volunteers working on behalf of the organisation have a duty to promote the welfare and safety of vulnerable adults. Staff and volunteers may receive disclosures of abuse and observe vulnerable adults who are at risk. This policy will enable staff/volunteers to make informed and confident responses to specific adult protection issues.

- 6.2. It is important that vulnerable adults are protected from abuse. All complaints, allegations or suspicions must be taken seriously. This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that a vulnerable adult has been abused.
- 6.3. The CRUMBS procedures and processes for incident reporting and investigation are to be found at Appendix 1.
- 6.4. Promises of confidentiality must not be given as this may conflict with the need to ensure the safety and welfare of the individual.
- 6.5. A full record shall be made as soon as possible of the nature of the allegation and any other relevant information. This must include information in relation to the date, the time, the place where the alleged abuse happened, your name and the names of others present, the name of the complainant and, where different, the name of the adult who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation.
- 6.6. Any suspicion, allegation or incident of abuse must be reported to the Designated Lead or Senior Manager on that working day where possible.
- 6.7. The nominated member of staff shall telephone and report the matter to the appropriate body/agency including the local authority safeguarding team (See Appendix 1 - Outline Processes). A written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the relevant local authority adult social services department within 24 hours.
- 6.8. This must include information in relation to the date, the time, the place where the alleged abuse happened, your name, the names of others present, the name of the complainant, and, where different, the name of the adult who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, and the account which has been given of the allegation.
- 6.9. Any suspicion, allegation, or incident of abuse must be reported to the Designated Lead or Senior Manager on that working day where possible.
- 6.10. The nominated member of staff shall telephone and report the matter to the appropriate body/agency including the local authority safeguarding team. A written record of the date and time of the report shall be made, and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the relevant local authority adult social services department within 24 hours.

7. DISCLOSURE AND BARRING

- 7.1. The Disclosure and Barring scheme is designed to give greater protection to vulnerable groups. As a care provider, we are obliged to check that potential new staff, and volunteers are not on the Barred List before allowing them to work for us. We are unable to employ anyone in a care capacity who is on this list.
- 7.2. We also have a duty to refer any worker to the Disclosure and Barring Service where we suspect any case of abuse. The Barred Lists are now managed by the Disclosure and Barring Service.
- 7.3. All staff, trustees, and volunteers are subject to the scheme.

8. LEGAL FRAMEWORK

- 8.1. This policy has been drawn up on the basis of law and guidance that seeks to protect those vulnerable, namely:
 - 8.1.1. Data Protection Act 1998.
 - 8.1.2. Human Rights Act 1998.
 - 8.1.3. Sexual Offences Act 2003.
 - 8.1.4. Safeguarding Vulnerable Groups Acts 2006.
 - 8.1.5. Protection of Freedoms Act 2012.
 - 8.1.6. Children and Families Act 2014.
 - 8.1.7. Special educational needs and disability (SEND) code of practice: 0 to 25 years – Statutory guidance for organisations' which work with and support children and young people who have special educational needs or disabilities; HM Government 2014.
 - 8.1.8. Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents, and carers; HM Government 2015.
 - 8.1.9. Working together to safeguarding children 2019.
 - 8.1.10. Children and Social Work Act 2017.
 - 8.1.11. Keeping Children Safe in Education 2020 (KCSIE).

9. STANDARDS OF BEHAVIOUR

- 9.1. When engaging with any vulnerable person on behalf of The CRUMBS project, employees and volunteers are considered to be acting in a position of trust. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship.

- 9.2. When working with vulnerable individuals on any CRUMBS programme or events, it is essential that all:
- 9.2.1. Uphold the Safeguarding Code of Conduct, and any additional safeguarding procedures.
 - 9.2.2. At all times, behave as a role model, displaying a consistently high standard of behaviour and appearance (disciplined/committed/time keeping), remember individuals learn by example and treat everyone fairly, without prejudice or discrimination and avoid favouritism.
 - 9.2.3. Establish and address the additional needs of disabled participants or other vulnerable groups.
 - 9.2.4. Respect and listen to the opinions of all individuals.
 - 9.2.5. Consider the wellbeing and safety of the vulnerable at all times.
 - 9.2.6. Take time to explain techniques and instructions to ensure they are clearly understood.
 - 9.2.7. Develop an appropriate working relationship with participants, based on mutual trust and respect.
 - 9.2.8. Never use sanctions that humiliate or harm.
 - 9.2.9. Ensure all contact, interactions, and communications (face-to-face and online) are appropriate and relevant to the work of The CRUMBS Project and always use language which is appropriate and is neither bullying, offensive, sexist, racist, homophobic, intimidatory, or discriminatory.
 - 9.2.10. Maintain appropriate conduct and avoid threatening or potentially violent behaviour such that the vulnerable have no cause to feel anxious or frightened.
 - 9.2.11. Ensure that the focus of your relationship with the vulnerable person remains professional at all times.
 - 9.2.12. Foster a culture where everyone feels comfortable enough to raise any concerns they may have about inappropriate attitudes or behaviour towards the vulnerable.
 - 9.2.13. Carefully consider any physical contact with the vulnerable. If anyone is distressed, always seek help from another member of staff. Be aware that physical contact with individuals may be misinterpreted, no matter how well intentioned.
 - 9.2.14. Ensure allegations or disclosures about abuse by anyone are taken seriously and reported, including peer - on - peer abuse and any allegations made against you.

- 9.2.15. Follow the CRUMBS Project safeguarding procedures for reporting such concerns (Appendix 1).
- 9.2.16. Challenge unacceptable behaviour and report all allegations and suspicions of abuse regardless of the status of the adult(s) or organisation(s) that may be implicated in so doing.

SECTION 2 PROCEDURES

1. SAFEGUARDING PROCEDURES

- 1.1. The following measures and procedures have been put in place to ensure The CRUMBS project is able to uphold its commitment to safeguarding: (See Processes Outline at Appendix 1).

2. SAFEGUARDING CODE OF CONDUCT

- 2.1. The Safeguarding Code of Conduct outlines the behaviour, as outlined above, expected of staff and volunteers of The CRUMBS project. The underpinning principles of the code are that:
 - 2.1.1. the welfare of vulnerable individuals is paramount.
 - 2.1.2. it is the responsibility of all staff and volunteers to behave with integrity, maturity, and good judgement.
- 2.2. Following the Safeguarding Code of Conduct will help to protect vulnerable individuals from abuse and/or inappropriate behaviour from adults; clarifies the standard of behaviour expected of staff and volunteers; and will reduce the possibility of unfounded allegations of abuse being made against them.
- 2.3. All staff and volunteers must uphold the code of conduct. It must be signed before working with vulnerable adults. Volunteers are also provided with a copy of this Safeguarding Policy.

3. PROCEDURES FOR REFERRAL

- 3.1. All action is taken in line with law and guidance.
- 3.2. If vulnerable adult makes a disclosure to you as an employee or representative of The CRUMBS Project or indicates that they would like to make a disclosure, it is important that you:
 - 3.2.1. Take what the person is saying seriously, however, you **MUST** inform the individual that you cannot keep any shared information confidential. Listen with care but do not ask any leading or unnecessary questions. Try to reassure the person that they are not to blame, and they are right to tell. Do not approach a suspected abuser yourself.
 - 3.2.2. If you suspect or are told about an alleged abuse, you must take the following actions:
 - If it is an emergency, call 999.
 - Write down the nature of your concern and anything the person or vulnerable adult may have told you using their words. Sign and date the notes taken.

- Immediately report the grounds of your concern to the Senior Member of Staff on duty.
- Report as soon as possible to Vulnerable Adult Protection Lead.
- The Lead will immediately inform the relevant local authority adult social care Initial Response Team (IRT) and will follow up in writing, detailing what was discussed and any actions arising.
- The designated person should record:
 - What was said or seen.
 - By whom.
 - Date time and location.
 - All records should be signed and dated and include the contact details for the referrer.

3.2.3. The safety of the person is paramount. If the person is believed to be in immediate or imminent danger, call 999. If you are with the person, remain with them where possible and if it is safe to do so, until advised otherwise by the police.

3.2.4. Confidentiality will be maintained and information relating to individuals/families shared with staff on a strictly need - to - know basis.

4. ALLEGED ABUSE BY STAFF OR VOLUNTEERS

- 4.1. When an allegation is made against a member of staff or volunteer then the allegation must be passed to the Vulnerable Adult Protection Lead.
- 4.2. The Designated Lead must then make a referral to the relevant local authority adult social care team⁽³⁾.
- 4.3. The local authority officer contacted will record a note of the consultation and will advise on the appropriate action that needs to be taken.
- 4.4. If an allegation is made against the Designated Lead, then the allegation must be passed to the Chair of Trustees. Please see 'Definitions' for possible signs of abuse.
- 4.5. Reported allegations against a member of staff or a volunteer must remain confidential and will be dealt with under the Staff Handbook Disciplinary Procedure page 29
- 4.6. Reporting an allegation does not give an individual the right to know the details of how the allegation has been investigated, nor are they entitled to know the outcome of any related disciplinary hearing.

³ See also BCP Multi-Agency Adult Safeguarding (2005) Resources Hub <https://resources.crumbs.org.uk/resources/crumbs-safeguarding-policies>

- 4.7. If a member of staff or volunteer is concerned about how any allegation of suspected abuse has been handled, they should refer to the whistleblowing policy.
- 4.8. Our Safeguarding Policy will be made available to all stakeholders for review on request.

5. SAFEGUARDING TRAINING

- 5.1. Training Safeguarding forms a key part of the staff induction training and ongoing professional development. All staff and volunteers are required to attend training at least every two years. The training is recorded on the relevant training records. We regularly review and update training around all aspects of safeguarding.
- 5.2. Training Safeguarding forms a key part of the Trainee induction training and ongoing development. All trainees are required to attend training during the Foundation training process. The training is recorded on the relevant training records. This is to ensure that the Trainee understands what Safeguarding is and how it may affect them, what to do, what support and protection they will receive from The Crumbs Project and how it will be reported.

6. REVIEW

- 6.1. We are committed to reviewing our policy and good practice as part of our annual policy review processes.

7. DEFINITIONS

- 7.1. *Vulnerable Adult Protection Lead* refers to the member of staff responsible for safeguarding. The contact details are as follows: Ursula Boardman, Training and Development Manager and Head of Centre, ursulab@crumbs.org.uk
- 7.2. *Vulnerable Adults* are defined as an adult with safeguarding needs, being a person who is 18 years of age or over, and who is or may be in need of community care services by reason of mental or other disability age or illness, and is or may be unable to take care of him/herself. Or unable to protect him/herself against significant harm or serious exploitation.
- 7.3. *Types of abuse*. We recognise that vulnerable adults are subject to abuse when they experience the following types of abuse, as defined by statutory guidance: (As defined by the Department for Education (KCSIE 2020) and Children Act 1989 and 2004 and Care Act 2014).
- 7.4. *Physical abuse* may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a person. It also includes giving a child harmful drugs or alcohol. Female genital mutilation is a form of physical abuse which is illegal in the UK. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a vulnerable adult and also if inappropriate restraint is used.

Physical abuse, as well as being a result of an act of commission can also be caused through omission or the failure to act to protect.

7.5. Signs of physical abuse:

- 7.5.1. Any injuries not consistent with the explanation given for them.
- 7.5.2. Injuries which occur to the body in places which are not normally exposed to falls or games.
- 7.5.3. Unexplained bruising, marks, or injuries on any part of the body.
- 7.5.4. Bruises which reflect hand marks or fingertips (from slapping or pinching).
- 7.5.5. Cigarette burns.
- 7.5.6. Bite marks.
- 7.5.7. Broken bones.
- 7.5.8. Scalds.
- 7.5.9. Injuries which have not received medical attention.
- 7.5.10. Neglect - undernourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care.
- 7.5.11. Repeated urinary infections or unexplained stomach pains.

7.6. Changes in behaviour which can also indicate physical abuse:

- 7.6.1. Fear of parents/carers being approached for an explanation.
- 7.6.2. Aggressive behaviour or severe temper outbursts.
- 7.6.3. Flinching when approached or touched.
- 7.6.4. Reluctance to get changed, for example, wearing long sleeves in hot weather.
- 7.6.5. Depression.
- 7.6.6. Withdrawn behaviour.
- 7.6.7. Running away from home.

7.7. *Emotional abuse* can involve threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

7.8. Signs of emotional abuse:

- 7.8.1. The physical signs of emotional abuse may include:
 - 1. A failure to thrive or grow particularly if a child puts on weight in other circumstances: e.g., in hospital or away from their care.
 - 2. Sudden speech disorders.

3. Persistent tiredness.

7.8.2. Changes in behaviour which can also indicate emotional abuse include:

1. Obsessions or phobias.
2. Sudden under-achievement or lack of concentration.
3. Inappropriate relationships with peers and/or adults.
4. Attention seeking behaviour.
5. Fear of making mistakes.
6. Self-harm
7. Fear of parent/carer being approached regarding their behaviour.

7.9. *Sexual abuse* is when a person is used sexually by an adult. Sexual abuse can include kissing, touching the child's genitals or breasts, vaginal or anal intercourse and oral sex. Encouraging a person to look at pornographic magazines or videos is also sexual abuse. Bullying, racism and other types of discrimination are forms of abuse. Like other kinds of abuse, they can harm a child physically and emotionally. Sexual abuse includes sexual exploitation, such as forcing or enticing a person to take part in sexual activities, including prostitution.

7.9.1. Signs of sexual abuse: The physical signs of sexual abuse may include:

1. Pain or itching in the genital/anal area.
2. Bruising or bleeding near genital /anal areas.
3. Sexually transmitted disease.
4. Vaginal discharge or infection.
5. Stomach pains.
6. Discomfort when walking or sitting down.
7. Pregnancy.

7.9.2. Changes in behaviour which can also indicate sexual abuse include:

1. Sudden or unexplained changes in behaviour e.g., becoming withdrawn or aggressive.
2. Fear of being left with a specific person or group of people.
3. Having nightmares.
4. Running away from home.
5. Sexual knowledge which is beyond their age or developmental level.
6. Sexual drawings or language.
7. Eating problems such as over - eating or anorexia.

8. Self - harm or mutilation, sometimes leading to suicide attempts.
9. Saying they have secrets they cannot tell anyone about.
10. Substance or drug abuse.
11. Suddenly having unexplained sources of money or expensive gifts.
12. Not allowed to have friends.
13. Acting in an inappropriate sexually explicit way.

7.10. *Neglect* is the persistent failure to meet basic physical, medical and/or psychological needs, likely to result in a serious impairment of health or development. Neglect is also failure to provide access to appropriate services and the withholding of the necessities of life, e.g., nutrition, medication, and heating. Neglect may occur during pregnancy as a result of maternal substance abuse.

7.10.1. Signs of neglect: The physical signs of neglect may include:

1. Constant hunger, sometimes stealing food.
2. Constantly dirty or smelly.
3. Loss of weight or being constantly underweight.
4. Inappropriate dress for the conditions.

7.10.2. Changes in behaviour which can also indicate neglect include:

1. Complaining of being tired all the time.
2. Not requesting medical assistance and/or failing to attend appointments.
3. Having few friends.
4. Mentioning being left alone or unsupervised.

7.11. Other issues to be aware of:

7.11.1. *Financial Abuse* including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

7.11.2. *Discriminatory Abuse* including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.

7.11.3. *Institutional Abuse* may take the form of isolated incidents of poor and unprofessional practice at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other.

7.11.4. *Self-harm* is when somebody intentionally damages or injures their body. It is usually a way of coping with or expressing overwhelming emotional distress. Sometimes when people self-harm, they feel on some level that they intend to die. More than half of people who die by

suicide have a history of self-harm. But the intention is more often to punish themselves, express their distress, or relieve unbearable tension. Sometimes it's a mixture of all three. Self-harm can also be a cry for help.

7.11.5. *Bullying* is deliberately hurtful and harmful behaviour, often repeated over a period of time and from which it may be difficult to defend. Bullying may take many forms, including physical attacks, verbal (which would include name - calling, threats, racist or homophobic remarks) and emotional (for example, isolating an individual from the activities and social acceptance of others). Cyberbullying involves making use of social media, internet, the mobile phones or any other electronic device used to communicate with, to taunt, intimidate or threaten.

7.12. *Further definitions:* The rights of adults to live a life free from neglect, exploitation and abuse are protected by the Human Rights Act 1998. Specifically, an adult at risk, right to life is protected (under Article 2); their right to be protected from inhuman and degrading treatment (under Article 3); and their right to liberty and security (under Article 5).

7.13. Gender identity is a way to describe how someone feels about their gender. For example, some people may identify as a man or a woman, while others may find neither of these terms feel right for them, and identify as neither or somewhere in the middle.

7.14. While many people identify with the gender they were assigned at birth, for others gender is more of a spectrum, with lots of different possible identities. Gender identity is a personal feeling, and a person will be the best person to know what matches how they feel. People can also question or feel unsure about their gender identity, or find that their gender identity changes over time. This is sometimes called 'gender fluid'.

7.15. Gender expression is how someone chooses to express their gender identity. This could be through the way they dress, speak or act. For example, by wearing dresses or choosing to shave. How someone looks or dresses does not always reflect their gender identity.

7.16. Individuals may want to use pronouns that reflect their gender identity such as 'she' or 'her' while others may prefer gender neutral pronouns such as 'they'. They may also want to change their name. Try to use the correct pronouns and name when referring to an individual.

8. SUPPORTING POLICIES AND DOCUMENTS

8.1. These documents can be accessed at <https://resources.crumbs.org.uk/resources/crumbs-safeguarding-policies> or on request. by contacting the The Training Centre. (See Staff Handbook for further details)

- 8.1.1. Code of Conduct.
- 8.1.2. Safeguarding Code of Conduct.
- 8.1.3. Whistleblowing Policy.
- 8.1.4. Health and Safety Policy.
- 8.1.5. Covid - 19 Risk Assessment.

9. APPENDICES

Appendix 1 - CRUMBS Safeguarding Incident Investigation Process v1.2

Appendix 2 - CRUMBS Safeguarding Incident Investigation Process v1.2 - Staff/
Volunteer (Staff)

Appendix 3 - CRUMBS Serious Incident Reporting(SIR) v1.2