



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

WISE UP WORKSHOPS CIC

SAFEGUARDING POLICY

(covering vulnerable adults and children)

If there is any immediate danger, call 999.

WISE UP Workshops has a duty of care as set down in the Safeguarding Vulnerable Groups Act 2006, Children Act 2004 and Vulnerable Adults (Care Act 2014) who come into contact with us. It is the responsibility of WISE UP Workshops to safeguard those young people, children and adults. This policy applies to all relevant activities, all our communications including digital media and to all individuals working in such activities whether as an employee, freelancer, or volunteer.

This policy runs in conjunction with our *e-safety policy*. And links to the WISE UP Workshops *Recruitment Policy*, *Whistle Blowing Policy* and *Anti-Bullying Policy*.

Aims

There are three main principles to this Safeguarding Children and Adults Policy:

1. **Prevention** - to safeguard and promote the interests and well being of WISE UP Workshops users and staff to prevent abuse
2. **Protection** - providing a step-by-step guide on the procedure to follow if an allegation of/ or abuse has taken place
3. **Support** - to service users and employees, alleged victim, or perpetrator.



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

WISE UP Workshops staff will endeavour to ensure that all children, young people, and adults participating in WISE UP Workshops activities both physically and virtually or using WISE UP Workshops facilities will do so safely and be treated with respect and understanding.

WISE UP Workshops will take all reasonable steps to protect the rights, health and well-being of groups who take part in any activities organised by WISE UP Workshops.

Protection and safeguarding issues can be emotive and WISE UP Workshops will offer suitable impartial support to any member of staff affected by this policy, whether directly or indirectly.

1. Child Protection

Child Protection training will be made available to all members of staff who are regularly working with children and young people whether directly or indirectly. This training will be updated annually.

Child Protection/Vulnerable Adults - Designated Person

The named, designated people for Safeguarding and Child Protection at WISE UP Workshops are ***Elsbeth Roberts and Ann Angus*** with Elsbeth Roberts as the lead person.

The general role of the designated person is to:

1. Be the main point of contact for staff, volunteers, young people and parents/carers in all matters relating to child protection and safeguarding.
2. Stay up to date with legislation, training and developments relating to safeguarding and child protection.

If a safeguarding matter arises, the designated person will:



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

1. Receive information from staff, volunteers, young people, parents, and other parties who have child protection queries or concerns and follow them up.
2. Assess information promptly and carefully, clarifying and obtaining information about the matter as appropriate.
3. Consult with statutory child protection agencies to test doubts or uncertainties
4. Make a formal referral to a statutory child protection agency or the police without delay
5. Record the actions clearly and appropriately

Ways to contact the Designated Child Protection Officer must be clear and easily accessed to all relevant parties.

Images, Photography and Video

WISE UP Workshops will take pictures and footage of events and sessions for:

- Marketing
- Evaluation and evidence

In the event of WISE UP Workshops engaging someone to take photographs/film of WISE UP Workshops events or sessions, WISE UP Workshops will either:

- Ensure that consent forms have been received from parents or carers of those under 18/vulnerable adults.
- Clearly display notices that film/photographs are being taken at events
- Ensure that the person taking film or photos will ask if it is suitable for those images to be used for marketing or evaluation purposes.

Any images that are taken will be edited for suitable images. All unsuitable images or film footage will be destroyed. Film or photographs



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

that are kept will be done so on the WISE UP Workshops pc and will be filed with the event and date that the footage/images were taken. The images will only be accessed by the marketing team for marketing purposes and by project managers for evaluation purposes.

Practice when abuse is disclosed or suspected.

Abuse can cover a wide range of issues including neglect, physical, sexual, and emotional abuse. All allegations, reports or suspicions of abuse will be treated seriously and with sensitivity by the Designated Child Protection Officer.

Staff cannot promise confidentiality to any person who may disclose abuse to them.

Where it is believed that a child is suffering from or is at risk from, significant harm, the matter should be reported immediately to a senior staff member who will report the case to the Social Services Inspection Unit.

Disclosure from a child/adult

- If a child/adult discloses abuse staff should give the individual the opportunity to talk in private but in sight of other workers.
- Listen carefully to what the person is saying and offer support and reassurance.
- Do not express anger or shock.
- Be careful not to interrogate the individual as this may contaminate evidence and prejudice future action.
- It is important never to make promises that cannot be kept.
- It is important to make clear to the child/young person/ adult that what is said will be passed on to others.



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

- Make it clear that you will only tell the people who need to know and who should be able to help.
- The member of staff should make a careful written record of all that is said at the earliest possible opportunity and to arrange an urgent meeting with a senior staff member. Good recording is an essential part of the procedure.

Make sure any records are:

Accurate A careful record should be made of any concerns and relevant incidents

Concise Facts should be recorded without unnecessary detail

Factual It is essential to record the nature and source of the information and by whom. What was observed and by whom, hearsay and third party information must be clearly recorded as such.

Ethical It is important to be non-judgemental and non-discriminatory.

When recording a disclosure or an allegation you should aim to:

- Note what the person has said using the person's own words
- Describe the circumstances in which the disclosure came about
- Note the setting and anyone else who was there at the time
- Be aware that the report may be required later as part of an investigation
- The written account should be passed to the designated Safeguarding Officer and stored in a safe place
- It is not the responsibility of staff to investigate the disclosure or to decide whether or not abuse has taken place. Each employee has a responsibility to act if there is a cause for concern
- A member of the Leadership Team is responsible for reporting disclosure to Social Services.



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

Suspicion of child/adult abuse

A member of staff who suspects that an individual is experiencing abuse should ask for a confidential meeting with a member of the operational team..

Appropriate action will be discussed and where there are reasonable grounds (e.g. behaviour, physical symptoms or signs) the senior staff member will inform Social Services.

Keep to the facts - dates and particular incidents. When expressing an opinion make it clear that **it is your opinion only.**

Immediate action

Any member of staff who believes an individual may be suffering or may be likely to be at imminent risk of suffering significant harm, and causes of physical and sexual abuse must make a referral to Social Services.

1. Call 999 if there is any immediate danger
2. This should be done by passing your concerns immediately to the senior staff member or if unavailable directly to Social Services
3. There is no requirement at this stage to inform parents / carers / responsible adults of your intention to inform Social Services if you feel this puts you or the individual at risk but it would be the normal procedure.
4. When speaking to Social Services give your name and role
5. Obtain and record the Social Workers name and the time the call was made
6. Explain your concerns, giving as much clear and concise information as possible, based on your professional judgement. The Social Worker



will assess the situation and if required initiate the appropriate procedures to protect the individual

7. At the earliest opportunity inform the senior staff member.

2. Safeguarding Vulnerable Adults

Adults may be harmed or taken advantage of by those in a position of power over them. Every adult has a right to:

- A life free of fear
- Be treated with dignity
- Have their choices respected and not be forced to do anything against their will

Who may be at risk of abuse?

Many adults over the age of 18 rely on other people to help them in their day to day living. This may be due to illness, disability, or frailty. They may be at risk from people they know such as a relative, friend, neighbour, or paid carer, or, less frequently, by a stranger.

Abuse may occur anywhere including in their own home, in care homes or in day care centres or hospitals.

What do we mean by abuse?

The Care Act 2014 defines the following areas of abuse and neglect; they are not exhaustive but are a guide to behaviour that may lead to a safeguarding enquiry.

This includes:

Physical abuse

The physical mistreatment of one person by another which may or may not result in physical injury, this may include slapping, burning, punching, unreasonable confinement, and pinching, force-feeding, misuse of medication, shaking, inappropriate moving and handling.

Signs and indicators

Over or under use of medication, burns in unusual places; hands, soles of feet, sudden incontinence, bruising at various healing stages, bite



marks, disclosure, bruising in the shape of objects, unexplained injuries or those that go untreated, reluctance to uncover parts of the body.

Sexual abuse

Any form of sexual activity that the adult does not want and or have not considered, a sexual relationship instigated by those in a position of trust, rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Signs and indicators

Signs of being abused may include recoiling from physical contact, genital discharge, fear of males or female, inappropriate sexual behaviour in presence of others, bruising to thighs, disclosure, and pregnancy. Abusers may take longer with personal care tasks, use offensive language, work alone with clients, or show favouritism to clients.

Financial or material abuse

Financial or material abuse – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits

Signs and indicators

This may include not allowing a person to access to their money, not spending allocated allowance on the individual, denying access to their money, theft from the individual, theft of property, misuse of benefits. There may be an over protection of money, money not available, forged signatures, disclosure, inability to pay bills, lack of money after payments of benefits or other, unexplained withdrawals. An abuser may be evasive when discussing finances, goods purchased may be in the possession of the abuser, there may be an over keenness in participating in activities involving individuals' money

Psychological and/or Emotional abuse

This abuse may involve the use of intimidation, indifference, hostility, rejection, threats of harm or abandonment, humiliation, verbal abuse



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

such as shouting, swearing or the use of discriminatory and or oppressive language. A deprivation of contact, blaming, controlling, coercion, harassment, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks. There may be a restriction of freedom, access to personal hygiene restricted, name calling, threat to withdraw care or support, threat of institutional care, use of bribes or threats or choice being neglected

Signs and indicators

Stress and or anxiety in response to certain people, disclosure, compulsive behaviour, reduction in skills and concentration, lack of trust, lack of self-esteem, someone may be frightened of other individuals, there may be changes in sleep patterns

Neglect and acts of omission

Behaviour by carers that results in the persistent or severe failure to meet the physical and or psychological needs of an individual in their care. This may include ignoring medical, emotional or physical care needs, failure to provide access to appropriate health-care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating, wilful failure to intervene or failing to consider the implications of non-intervention in behaviours which are dangerous to them or others, failure to use agreed risk management procedures, inadequate care in residential setting, withholding affection or communication, denying access to services.

Signs and indicators

There may be disclosure. Someone being abused may have low self-esteem, deterioration, depression, isolation, continence problems, sleep disturbances, pressure ulcers. There may be seemingly uncertain attitude and cold detachment from a carer, denying individuals request, lack of consideration to the individuals request, denying others access to the individual health care professionals

Self-neglect



This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Discriminatory Abuse

This includes forms of harassment, slurs, or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation, and religion or health status and may be the motivating factor in other forms of abuse. It can be personal, a hate crime or institutional.

Signs and indicators

There may be a withdrawal or rejection of culturally inappropriate services e.g. food, mixed gender groups or activities. Individual may simply agree with the abuser for an easier life, there may be disclosure, or someone may display low self-esteem. An abuser may react by saying "I treat everyone the same", have inappropriate nick names, be uncooperative, use derogatory language, or deny someone social and cultural contact.

Institutional or Organisational Abuse

Neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Signs and indicators

This may include a system that condones poor practice, deprived environment, lack of procedures for staff, one commode used for a number of people, no or little evidence of training, lack of staff support/supervision, lack of privacy or personal care, repeated unaddressed incidents of poor practice, lack of homely environment, manager implicated in poor practice. There may be a lack of personal clothing, no support plan, lack of stimulation, repeated falls, repeated infections, unexplained bruises/burns, pressure ulcers, unauthorised deprivation of liberty. Abusers may have a lack of understanding of a person's disability, misuse medication, use illegal controls and restraints, display undue/inappropriate physical intervention, and inappropriately use power/control.



Domestic abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- Sexual
- Financial
- Emotional

A new offence of coercive and controlling behaviour in intimate and familial relationships was introduced into the Serious Crime Act 2015. The offence will impose a maximum 5 year imprisonment, a fine or both.

Signs and indicators

May include many of those indicators listed under previous categories in this document, including unexplained bruising, withdrawal from activities, work, or volunteering, not being in control of finances, or decision making.

Modern slavery

Encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude and inhumane treatment.

Signs and indicators

There may be signs of physical or psychological abuse, victims may look malnourished or unkempt, or appear withdrawn. Victims may rarely be allowed to travel on their own, seem under the control, influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work. They may be living in dirty, cramped, or overcrowded accommodation, and / or living and working at the same address. Victims may have no identification documents, have few personal possessions, and always wear the same clothes day in day out. What clothes they do wear may not be suitable for their work. People may have little opportunity to move freely and may have had their travel documents retained, e.g. passports. They may be dropped off / collected for work on a regular basis either very early or late at night. Victims may avoid eye contact, appear frightened or hesitant to talk to strangers and



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family.

Radicalisation to terrorism

The Government through its PREVENT programme has highlighted how some adults may be vulnerable to radicalisation and involvement in terrorism. This can include the exploitation of vulnerable people and involve them in extremist activity. Radicalisation can be described as a process, by which a person to an increasing extent accepts the use of undemocratic or violent means, including terrorism, to reach a specific political/ideological objective. Vulnerable individuals being targeted for radicalisation/recruitment into violent extremism is viewed as a safeguarding issue.

Signs and indicators

May include being in contact with extremist recruiters. Articulating support for violent extremist causes or leaders. Accessing violent extremist websites, especially those with a social networking element. Possessing violent extremist literature. Using extremist narratives to explain personal disadvantage. Justifying the use of violence to solve societal issues. Joining extremist organisations. Significant changes to appearance and/or behaviour.

Who might abuse?

Abuse of adults at risk, may be perpetrated by a wide range of people including relatives, family members, professional staff, paid care workers, volunteers, other service users, neighbours, friends and associates, people who deliberately exploit vulnerable people and strangers.

Incidents of abuse may be one-off or multiple and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm.

Patterns of abuse vary and include:

- Serial abusing in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse.
- Long-term abuse in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse.



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

- Or opportunistic abuse such as theft occurring because money or jewellery has been left lying around.

The named, designated people for Safeguarding and Child Protection at WISE UP Workshops are ***Elsbeth Roberts and Ann Angus*** with Elspeth Roberts as the lead person.

If you are aware of a concerning or worrying situation please do not ignore it. Contact the Designated Officer (Elsbeth Roberts/ Ann Angus) who will contact the Safeguarding Adults Team We will always respect the wishes and feelings of the adult at risk.



Policy Applicable to both Child and Vulnerable Adult Safeguarding

Recruitment Procedure

WISE UP Workshops aims to ensure, as far as possible, that anyone working with children, young people or adults is safe to do so in terms of child protection and safeguarding.

The Company Administrator will ensure that the following checks are carried out on all relevant prospective staff and volunteers as well as relevant current staff and volunteers.

a) All relevant applicants (for regulated activity under the new disclosure and barring service) will be notified that DBS checks will be carried out as a condition of service. WISE UP Workshops will also follow guidelines regarding the appropriate level of check. Volunteers will be checked where they fall under DBS guidelines and a DBS check applied for accordingly. A decision about the results of the DBS check will be made by the Leadership

Team upon receipt of the results based on the position applied for and the information and results of the check.

b) Personal and professional references or personal recommendation will be required in writing through a standard reference request form.

c) Signed declaration (on application form)

d) Formal / interview process which will include a set of questions and / or a discussion of Child Protection and Safeguarding issues. This will include social networking websites.

For staff and employees working on regulated activity, existing checks will be appropriate for staff members who work with us on an infrequent basis. However, the disclosure must be enhanced and less than 2 years



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

old. The CRB/DBS reference number and umbrella body details will be needed so WISE UP Workshops can check the viability of the check.

However, we will consider the following before making a decision:

- The applicant's criminal record or other relevant information may have changed since its issue.
- The decision made by a Chief Police Officer to disclose information on a DBS certificate was made based on the position for which the criminal record check was originally applied for. WISE UP Workshops cannot assume that no other intelligence would be disclosed for a different position.
- The information revealed was based on the identity of the applicant, which was validated by another registered body, at the time that the original check was requested. Therefore, WISE UP Workshops should ensure that the identity details on the certificate match those of the applicant.

We will carry out CRB checks on people who work for WISE UP Workshops on a regular basis bearing in mind that there is no official expiry date for a criminal record check issued by the Disclosure and Barring Service (DBS) and noting that:

i. Any information revealed on a DBS certificate will be accurate at the time the certificate was issued.

WISE UP Workshops should check the date of issue on the certificate to decide whether to request a newer one. In certain employment sectors a new criminal record check may be required periodically.

ii. WISE UP Workshops may also be required by law to carry out a fresh check of the DBS children's and/or adults' barring lists in accordance with sector-specific guidance.



iii. WISE UP Workshops can keep a DBS certificate for no longer than six months, to allow for consideration and resolution of any disputes or complaints after a recruitment or suitability decision is made. If it is considered necessary to keep the certificate information for longer, you should consult the DBS.

These procedures are mandatory. If for any reason, the check has not been submitted to the DBS, then the member of staff will not work unaccompanied on an activity involving children or young people.

PROTECTION OF STAFF

Staff should be aware of issues around protection and safeguarding including the need to protect themselves from allegations of abuse. The following guidelines should be practised:

- Be publicly open when working with groups and avoid situations where staff and individuals are completely unobserved.
- As a basic principle no activity should be run without at least two members of staff present.
- If there is a need for individuals to undress they should be encouraged to undress themselves as far as is possible and if they require assistance to help each other in groups. If help is necessary from a staff member two members of staff should be always present.
- Do not engage in rough, physical or sexually provocative games, including horseplay.
- Do not allow or engage in any inappropriate touching of any form. It is recognised, however, that in caring for children and adults can, at times, involve physical contact (e.g. cuddles, picking up etc). Staff should be aware of how and when this is appropriate and ensures that they are always in public.



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

People must never be cuddled or picked up against their will. Always ask permission and explain the reason for any need to touch.

- Do not make sexually suggestive comments to individuals or groups - even in fun.
- Male members of staff should not use urinals when there are children present.
- If an individual requires help with toileting two members of staff must be present and parental permission obtained in writing.
- Do not do things of a personal nature that an individual can do for him/herself.
- If a member of staff accidentally hurts or distresses an individual in any way or if the individual misunderstands something that the person has said or done the senior staff member should be informed immediately, the Accident Book should be filled in and the parents/ guardians of the individual contacted.
- Criticism of participants should always be constructive.

ALLEGATIONS OF ABUSE AGAINST MEMBERS OF STAFF

If any allegations of abuse are made against a member of staff the Operational Team must be informed immediately. (The senior staff member will inform the Chair of the Board and the member of staff will be suspended from working whilst the necessary authority carries out an independent investigation. This does not imply guilt but is imposed to protect that staff member during the investigation and is in line with Lancashire Area Child Protection guidelines. If a senior staff member is the subject of the suspicion/allegation the report must be made directly to the Chair of the Board. Everyone has a responsibility to promote and



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

maintain good practice in all of WISE UP Workshops work. WISE UP Workshops actively requires staff to report all suspected bad practice and air any concerns in confidence if necessary. Better to report a suspicion and be wrong than not to report it at all.

CONFIDENTIALITY

Personal information about WISE UP Workshops users held by professionals is confidential and should not normally be disclosed without the consent of the person involved. The law does however permit disclosure of confidential information without permission if it is necessary to safeguard a child, children or adult; this includes cases of child protection.

REVIEW

WISE UP Workshops will review this policy annually to ensure its effectiveness and, where necessary, additional practical guidelines will be prepared and implemented.

Contact Numbers

For immediate danger call 999

Children call

Lancashire County Council Children services – 03001236720 or out hours 03001236722

Vulnerable Adults call

Lancashire County Council Adult Social Care – 0300 1236721

Lancashire Police 101



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

Wise Up Workshops CIC Child Protection Officer (s) Elspeth Roberts
07506 295782 or Ann Angus 07946379030

NSPCC

anonymous Helpline 0808 800 5000

Text 88858

Email help@nspcc.org.uk

Website nspcc.org.uk/reportconcern

Samaritans

- phone 08457 90 90 90
- email jo@samaritans.org

Childline 0800 1111



Appendix 1 – Signs of abuse and definitions (child and adults)

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning or suffocating, or otherwise causing physical harm to an individual. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to an individual whom they are looking after.

Possible Indicators of Physical Abuse

- Multiple bruising
- Fractures
- Burns
- Bed sores
- Fear
- Depression
- Unexplained weight loss
- Assault (can be intentional or reckless)

Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of an individual such as to cause severe and persistent adverse effects on an individual's emotional development. It may involve conveying to individuals that they are worthless or unloved, inadequate, or valued only insofar as they might meet the needs of another person. It may involve causing individuals frequently to feel frightened or in danger, or the exploitation or corruption of individuals.



WISE UP
WORKSHOPS

CIC safeguarding children & adults policy

Signs of emotional abuse:

- Fear
- Depression
- Confusion
- Loss of sleep
- Unexpected or unexplained change in behaviour
- Deprivation of liberty could be false imprisonment. Aggressive shouting causing fear of violence in a public place may be an offence against Public Order Act 1986, or harassment under the Protection from Harassment Act 1997

Sexual Abuse

Sexual abuse involves forcing or enticing an individual to take part in sexual activities, whether the individual is aware of what is happening. The activities may involve physical contact, involving penetrative (e.g. rape and buggery) or non - penetrative acts. They may include non-contact activities, such as involving individuals in looking at or in the production of pornographic material or watching sexual activities or encouraging individuals to behave in sexually inappropriate ways.

Possible signs of sexual abuse:

- Loss of sleep
- Unexpected or unexplained change in behaviour
- Bruising
- Soreness around the genitals
- Torn, stained or bloody underwear
- A preoccupation with anything sexual
- Sexually transmitted diseases
- Pregnancy
- Rape – e.g. a male member of staff having sex with a Mental Health client (see Mental Health Act 1983)
- Indecent Assault



Neglect

Neglect is the persistent failure to meet an individual's basic physical and or psychological needs. It may involve a parent or carer failing to provide adequate food, shelter, and clothing, failing to protect an individual from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect, or unresponsiveness to an individual's basic emotional needs.

Possible Indicators of Neglect and Acts of Omission

- Malnutrition
- Untreated medical problems
- Bed sores
- Confusion
- Over-sedation
- Deprivation of meals may constitute “wilful neglect”

Signed: Director **Ann Angus**

Date: January 2023

Interim review July 2023

Date of next review January 2024

Signed: Director Joanne Gibson J.Gibson

Director Ann Angus **A.Angus**