Cafcass Cymru
Safeguarding Procedure

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Cafcass Cymru Safeguarding Procedure
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1. Purpose

This procedure sets out Cafcass Cymru's approach to safeguarding children and, where relevant, adults at risk within family justice proceedings in Wales. It explains what colleagues must do when safeguarding concerns are identified and how decisions, referrals, escalation and recording should be managed.

Although Cafcass Cymru's statutory functions relate primarily to children involved in family justice proceedings, safeguarding concerns relating to adults at risk may arise in the course of that work. The safety and wellbeing of adults can have a direct impact on children's welfare and safeguarding, and concerns relating to adults at risk must therefore be considered in accordance with this procedure;

- aligns with the Wales Safeguarding Procedures and Working Together to Safeguard People statutory guidance;
- is compliant with relevant Welsh and UK legislation;
- applies to all Cafcass Cymru colleagues, irrespective of role;
- establishes organisational expectations for safeguarding decision-making, accountability, escalation, recording and governance.

Safeguarding is central to Cafcass Cymru's work with children and families. Responsibility does not end when a concern is identified or referred. Practitioners, and where appropriate managers, must continue to consider risk, safety, protective action, follow-up, court communication and whether professional challenge or escalation is required.

Cafcass Cymru is not a statutory child protection agency. It undertakes safeguarding checks, assesses welfare and safety concerns for the family court, shares information and provides professional analysis. It does not conduct child protection investigations or section 47 enquiries; these are the responsibility of the relevant local authority.

The procedure also explains how Cafcass Cymru responds to concerns involving practitioners or persons in positions of trust, including threshold decisions, risk assessment, recording, organisational accountability and safeguarding oversight.

2. Language

Where a Cafcass Cymru colleague decides not to take action that would ordinarily be expected under this procedure, the rationale must be clearly and contemporaneously recorded and, where appropriate, discussed with a Practice Manager or Head of Operations.

Must	In this procedure, "must" means that the action is required by law, organisational procedure, safeguarding governance, or because it is essential to safe and accountable safeguarding practice. If a required action is not taken, or is delayed, the reason must be clear and recorded.
Should	"Should" is used where professional judgement is needed. This includes decisions that depend on the circumstances of the case, the information available, proportionality and the level of risk.
Report / Referral	For the purposes of this procedure, "safeguarding referral" is used throughout, as this reflects the terminology used within Cafcass Cymru systems and practice. Where statutory guidance refers to a "report", this should be understood as equivalent to a safeguarding referral.
Adult & Child	This procedure applies to safeguarding concerns relating to children and adults at risk. Where the procedure refers to "risk", this should be read as applying to a child, an adult at risk, or both, depending on the circumstances.

3. Scope and Application

This procedure applies to all Cafcass Cymru colleagues, irrespective of role, grade or location. For the purposes of this procedure, “colleagues” includes employees, agency workers, secondees, contractors, consultants, commissioned practitioners and any other person undertaking work on behalf of Cafcass Cymru, where this is consistent with their role and contractual arrangements.

This procedure applies where Cafcass Cymru colleagues:

- identify, receive or observe information suggesting that a child may be at risk of abuse, neglect or other harm;
- identify, receive or observe information suggesting that an adult may be at risk of abuse, neglect or other harm;
- become aware of safeguarding concerns on open or closed cases;
- become aware of safeguarding concerns relating to a child who is not the subject of current proceedings;
- become aware of concerns relating to practitioners, professionals, carers, volunteers or other persons in positions of trust;
- become aware of concerns regarding the conduct of Cafcass Cymru colleagues.

This procedure does not replace the statutory safeguarding responsibilities of local authorities, the police or other safeguarding partners. Cafcass Cymru’s role is to identify safeguarding concerns, share relevant information, provide professional analysis, support safe court decision-making and act in accordance with its statutory functions.

4. Safeguarding Principles

Cafcass Cymru safeguarding practice is underpinned by the following principles:

- child-centred and trauma-informed practice;
- early identification and timely action where there is reasonable cause to suspect harm;
- recognition that children may be harmed directly or indirectly, including through risks experienced by adults;
- recognition of cumulative harm, domestic abuse, coercive control and adversity;
- professional curiosity and critical analysis;
- proportionality and professional judgement;
- collaboration and lawful information sharing in the interests of safety;
- professional accountability and governance;
- defensible decision-making;
- consideration of immediate, ongoing and transferrable risk.

Decision-Making

- Safeguarding decisions must be evidence-informed, proportionate and capable of being clearly explained.
- Where professional judgement results in a decision not to take safeguarding action that would ordinarily be expected, the rationale must be clearly and contemporaneously recorded and, where appropriate, discussed with a Practice Manager or Head of Operations.
- Decisions should be capable of withstanding professional scrutiny and demonstrating how welfare, safety, risk and protective factors have been considered.

Risk Assessment

- Safeguarding practice must consider immediate, ongoing and emerging risk.
- Where concerns involve practitioners, professionals, carers, volunteers, people who use the service, or others in positions of trust, consideration must be given to whether the behaviour or circumstances may create wider or transferrable risk.
- Risk analysis and professional reasoning must be clearly recorded.

5. Legal and Statutory Framework

Cafcass Cymru operates within the legal framework relevant to its family justice functions, including:

- Children Act 2004, section 35 - duty to safeguard and promote the welfare of children and provide advice to the court;
- Children Act 1989, section 16A - duty to assess and report to the court where there is cause to suspect harm.

Welsh Safeguarding Framework

Cafcass Cymru operates within the safeguarding framework established by:

- Social Services and Well-being (Wales) Act 2014;
- Working Together to Safeguard People statutory guidance;
- Wales Safeguarding Procedures;
- relevant Regional Safeguarding Board arrangements.

Part 7 of the Social Services and Well-being (Wales) Act 2014 provides the statutory safeguarding framework for children and adults at risk in Wales. Although Cafcass Cymru is not listed as a "relevant partner" for the purposes of the statutory duties to report children and adults at risk under Part 7, colleagues are expected to respond to safeguarding concerns in a manner consistent with the spirit and intent of the Welsh safeguarding framework. This includes making safeguarding referrals in line with this procedure, professional safeguarding responsibilities, Cafcass Cymru's child welfare functions, and the expectations set out in the Wales Safeguarding Procedures.

Protection from Physical Punishment

Cafcass Cymru colleagues must be alert to the safeguarding implications of the Children (Abolition of Defence of Reasonable Punishment) (Wales) Act 2020, which removed the defence of reasonable punishment in Wales.

Information Sharing

Safeguarding-related information sharing must be considered in accordance with:

- UK GDPR;
- Data Protection Act 2018;
- safeguarding-related lawful information-sharing provisions;
- Welsh Government and Cafcass Cymru information management policies.

Information relevant to safeguarding may be shared without consent where sharing is necessary, proportionate and justified to protect a child or adult at risk.

Professional Standards

Where Cafcass Cymru colleagues are registered with Social Care Wales or another professional regulator, they must also comply with the relevant professional standards, codes of practice and registration requirements. Safeguarding practice under this procedure should be consistent with those professional obligations.

6. Roles and Responsibilities

All colleagues are responsible for remaining alert to safeguarding concerns and acting promptly where risk is identified. Where there is immediate risk, colleagues must take urgent action without delay. Concerns must be shared with the appropriate practitioner or manager, advice should be sought where needed, and all safeguarding concerns, actions and decisions must be accurately and contemporaneously recorded. Colleagues are also expected to cooperate with safeguarding processes where required.

Corporate Services and Governance Colleagues (CSG)

- All of CSG, which includes business support colleagues, are to remain alert to safeguarding concerns that may be identified through telephone calls, emails, correspondence, documentation or contact with people who use our service and partner agencies.
- Ensuring any information which may indicate a safeguarding concern is immediately escalated to the practitioner or manager within the operational area.
- Should no-one be available, advice should be sought without delay as to what next steps are required.

Practitioners

- Practitioners are responsible for assessing and analysing safeguarding information within the context of the case.
- They must consider whether safeguarding thresholds are met, seek management consultation where significant concerns arise, and ensure that current safeguarding information is reflected in case planning, court reporting and any recommendation made to the court.
- Practitioners must continue to assess risk after a safeguarding referral has been made, consider whether Wales Safeguarding Procedures arrangements relating to practitioners or persons in positions of trust may apply, and use professional challenge where concerns remain unresolved.

Practice Managers

- Practice Managers provide safeguarding consultation, oversight and support for proportionate decision-making.
- They must ensure that safeguarding decisions and rationale are clearly recorded, support follow-up, professional challenge and escalation where required, and consider transferrable risk where concerns involve practitioners, professionals, carers, volunteers or persons in positions of trust.
- Where risk remains active, unclear or disputed, Practice Managers must ensure that the safeguarding response is reviewed.

Heads of Operations

- Heads of Operations provide senior safeguarding oversight and support multi-agency escalation and challenge.
- They are responsible for maintaining effective safeguarding governance arrangements, supporting organisational learning and quality assurance, and overseeing significant safeguarding disputes, repeated unresolved concerns and cases involving potential organisational risk.

7. Identifying Safeguarding Concerns

Safeguarding concerns may arise through:

- direct report from a child or adult;
- observation;
- professional assessment;
- information from partner agencies;
- information from the court;
- analysis of cumulative harm or escalating risk;
- concerns relating to practitioners, professionals, carers, volunteers or persons in positions of trust;
- concerns relating to children who are not the subject of current proceedings;
- learning from internal practice reviews and case file audits.

Reasonable cause to suspect harm does not require certainty. Professional judgement should be exercised in light of all available information, including the totality of known risk, protective factors, patterns of behaviour and the child's lived experience.

8. Child Exploitation

Child Sexual Exploitation and Group-Based Child Sexual Exploitation

Cafcass Cymru recognises that children may be at risk of child sexual exploitation, including organised or group-based child sexual exploitation. Practitioners must remain alert to indicators of grooming, coercion, control, trafficking, exploitation and other forms of extra-familial harm.

Where a Cafcass Cymru colleague identifies concerns that a child may be at risk of child sexual exploitation, including organised or group-based child sexual exploitation, they must follow the safeguarding process set out in this procedure. This includes considering whether the threshold for a safeguarding referral is met, making a referral without delay where required, sharing relevant information, recording the rationale for decisions, and considering whether court communication, professional challenge or escalation is needed.

Concerns must be responded to in accordance with the current *Wales Safeguarding Procedures* and the Welsh Government statutory guidance, *Working Together to Safeguard People: Volume 7 – Safeguarding Children from Child Sexual Exploitation*, issued under the *Social Services and Well-being (Wales) Act 2014*. Practitioners must ensure they are referring to the current published version.

Child Criminal Exploitation

Cafcass Cymru recognises that children may be groomed, coerced, controlled or manipulated into criminal activity, including drug supply, theft or financial crime. A child's involvement or apparent willingness to participate must not obscure possible exploitation or their need for protection. Practitioners must consider the implications for the child's safety. Concerns must be addressed through this procedure's safeguarding, information-sharing, referral and escalation arrangements, in accordance with the current Wales Safeguarding Procedures and accompanying All Wales Practice Guide, *Safeguarding children from Child Criminal Exploitation*, alongside relevant Regional Safeguarding Board arrangements.

9. Responding to Safeguarding Concerns

Immediate Risk

- Where there is an immediate threat to life, Cafcass Cymru colleagues must contact emergency services without delay.
- Safeguarding action must not be delayed pending consultation, completion of reports, completion of tools, administrative processes or court-related work.
- The action taken, the information shared, and the rationale for any immediate decisions must be recorded contemporaneously.

Safeguarding Consultation

Significant safeguarding concerns should be discussed with a Practice Manager as soon as reasonably practicable, provided this does not delay action needed to keep someone safe. Where a Practice Manager is unavailable and delay may increase risk, advice should be sought from a Head of Operations or another appropriate manager.

Consultation should consider:

- the nature and immediacy of safeguarding risk;
- whether safeguarding thresholds are met;
- who is at risk, including whether this relates to a non-subject child, professional, person in a position of trust, or Cafcass Cymru colleague;
- whether urgent court action or communication is required;
- whether a Section 16A risk assessment is required and, if so, what recommendations should be made;[1]
- any relevant PD12J considerations;[2]
- whether professional challenge or escalation may be required;
- what follow-up action is needed.

Consultation and agreed actions must be clearly and contemporaneously recorded on the electronic case file.

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[1] Section 16A of the Children Act 1989 requires Cafcass Cymru to undertake a risk assessment and provide it to the court where, in the course of carrying out relevant family proceedings functions, there is cause to suspect that a child is at risk of harm.

[2] Practice Direction 12J (PD12J) provides guidance to the Family Court where domestic abuse is alleged or identified. It requires the court to consider the impact of domestic abuse on the safety and welfare of the child and the parent experiencing abuse when making decisions about child arrangements and family time.

10. Information Sharing and Consent

- Safeguarding information may include personal data and special category personal data.
- Information sharing must be necessary, proportionate and justified, and considered in accordance with UK GDPR, the Data Protection Act 2018, safeguarding information-sharing provisions, and Welsh Government and Cafcass Cymru information management policies.
- Where information is shared without consent, the rationale must be clearly recorded, including why consent was not sought or why it was not appropriate to rely on consent in the safeguarding circumstances.

Information relevant to safeguarding may be shared without consent where:

- seeking consent may place someone at increased risk;
- consent cannot reasonably be obtained;
- sharing is necessary to protect someone;
- seeking consent may prejudice safeguarding action, police enquiries or local authority enquiries.

Where safe and appropriate, individuals should be informed that information is being shared. However, safeguarding action must not be delayed where consent has not been sought or obtained.

All decisions about information sharing, including decisions not to inform a person that information is being shared, must be clearly recorded with the rationale.

11. Making a Safeguarding Referral

Where the threshold for a safeguarding referral is met:

- referrals must be made without delay;
- referrals relating to children must be generated through Cafcass Cymru's electronic case file system, IRIS. Adult safeguarding referrals must follow the relevant local authority's referral process;
- the referrer is responsible for sending the referral to the correct local authority; this is not the responsibility of the Central Administration Processing Team (CAPT);
- written confirmation should follow verbal reports where appropriate;
- safeguarding action must be clearly and contemporaneously recorded on the electronic case file.

Safeguarding referrals should contain:

- relevant facts;
- the source of the information;
- professional analysis;
- risks and protective factors;
- the known wishes and feelings where relevant and available;
- rationale for referral;
- any identified ongoing or transferrable risk;
- any immediate action already taken;
- any relevant court timetable or urgent hearing information.

Making a safeguarding referral does not conclude Cafcass Cymru's safeguarding responsibilities. Practitioners and managers must consider the response received, whether risk has been adequately addressed, and whether further information sharing, follow-up, professional challenge, escalation or court communication is required.

Safeguarding and Care and Support Referral Pathways

Cafcass Cymru colleagues must consider the most appropriate referral pathway, based on the information available, the level of risk and the purpose of the referral. A safeguarding referral should be made where there is reasonable cause to suspect that a child or adult is experiencing, or is at risk of, abuse, neglect or other harm. Where information suggests that a child may be suffering, or is likely to suffer, significant harm, the Local Authority is responsible for determining whether enquiries are required under section 47 of the Children Act 1989.

Adults at risk

Where there is reasonable cause to suspect that an adult is at risk, a referral must be made without delay to the relevant local authority adult safeguarding service. The referrer is responsible for identifying and following that local authority's referral process, which will be available on their website. Where there is an immediate risk to life or safety, the police must be contacted. All actions and decisions must be recorded on the electronic case file.

A referral for Care and Support under Part 3 of the Social Services and Well-being (Wales) Act 2014 is different from a safeguarding referral. It may be appropriate where a child, adult or family may require assessment, support or services, but the safeguarding threshold is not met. Consent should ordinarily be obtained before making a Care and Support referral, and the purpose of the referral should be explained to the individual or person with parental responsibility. Where seeking consent may increase risk, prejudice safeguarding action, or indicate that safeguarding concerns are present, practitioners must consider whether a safeguarding referral is required instead.

Where safeguarding concerns are present, the need for consent must not delay a safeguarding referral or any other protective action. The reason for the referral pathway chosen, including any decision about consent, must be clearly recorded on the electronic case file.

Once a Safeguarding Referral has been made

Following a safeguarding referral, the Local Authority should respond to the referrer without delay and provide feedback on the outcome of its screening and decision-making. Practitioners must review any response received and consider whether the safeguarding concern has been appropriately addressed, including whether further action, information sharing, professional challenge, escalation or court communication is required.

Where no outcome response is received, Cafcass Cymru's case management system, IRIS, will issue automated reminder prompts to the relevant Local Authority. If no acknowledgement or outcome has been received within 7 working days, the practitioner should make further contact with the Local Authority to seek an update and ensure that safeguarding concerns have been appropriately considered.

Where concerns remain following a referral, practitioners must discuss this with a Practice Manager to determine whether escalation is required by the Cafcass Cymru Head of Operations to the Local Authority Head of Children's Services.

12. Children Who Are Not Subject of Current Proceedings or Do Not Receive a Service From Cafcass Cymru (non-subject children)

This section recognises that Cafcass Cymru is not listed as a "relevant partner" for the purposes of the statutory duties to report children and adults at risk under Part 7 of the Social Services and Well-being (Wales) Act 2014. However, where information suggests that a non-subject child may be at risk of harm, there remains a clear expectation that colleagues consider whether a safeguarding referral is required. This expectation is grounded in professional safeguarding responsibilities, Cafcass Cymru's child welfare functions, public accountability and the Wales Safeguarding Procedures.

Cafcass Cymru safeguarding responsibilities may arise in relation to children who are not the subject of current family proceedings.

Where information obtained through Cafcass Cymru involvement indicates that a child who is not the subject of current proceedings may be experiencing, or may be at risk of, abuse, neglect or other harm, practitioners should consider whether a safeguarding referral to the relevant local authority and/or other appropriate agency should be made.

The basis for considering action in relation to non-subject children arises from professional safeguarding responsibilities, Cafcass Cymru's wider statutory and child welfare functions, principles of public accountability and the expectations set out in the Wales Safeguarding Procedures.

The decision about whether to make a safeguarding referral in relation to a non-subject child requires professional judgement. Practitioners should consider the nature and seriousness of the information, the apparent level of risk, the immediacy of any harm and whether information-sharing is necessary, proportionate and justified to protect the child. Where another agency is already aware of the concern, this should not deter a referral where needed. Where the information suggests immediate risk, serious harm, or a need for urgent protective action, colleagues must not delay taking appropriate safeguarding action, including contacting emergency services where required.

The rationale for any decision, including a decision to make or not make a referral, must be clearly and contemporaneously recorded. Where the concern is significant, complex, or relates to immediate or ongoing risk, the practitioner must discuss the matter with a Practice Manager or Head of Operations.

Section 16A does not apply to children who are not the subject of the proceedings. Safeguarding concerns relating to non-subject children must be considered and responded to in accordance with this section.

13. Interface with the Court

Safeguarding action must be communicated appropriately to the court where relevant to Cafcass Cymru's functions and the proceedings. This may include:

- filing a Section 16A Risk Assessment Report;
- informing the court of safeguarding referrals;
- identifying unresolved safeguarding concerns;
- urgent safety planning, protective measures, changes to family time and case management implications.

Section 16A Risk Assessments

Section 16A of the Children Act 1989 applies where a Cafcass Cymru practitioner is carrying out a relevant family proceedings function and is given cause to suspect that the child concerned is at risk of harm.

Where the Section 16A threshold is met, the practitioner must complete a risk assessment and provide it to the court. This is a statutory duty.

Where a safeguarding referral has been made to the local authority in respect of a non-subject child, a Section 16A report should not be filed unless the concern is also relevant to the child or children who are subject to the proceedings.

Practitioners do not require a direction from the court before completing a Section 16A risk assessment where the statutory threshold is met. Where a practitioner is considering filing a Section 16A risk assessment, they should discuss this with a Practice Manager or Head of Operations unless delay would increase risk or prevent urgent safeguarding action. A Section 16A risk assessment should clearly set out:

- the information giving rise to cause to suspect that the child is at risk of harm;
- the nature of the current risk;
- the evidence and analysis underpinning the assessment;
- the likely impact of harm on the child;
- any safeguarding referral made, including the date and known outcome where available;
- any urgent protective action or court direction considered necessary;
- any disclosure considerations;
- whether the sharing of information may increase risk
- a view on how and when the information should be shared with the parties, noting that the Section 16A report should be filed with the court only unless the court directs otherwise.

The discussion with the Practice Manager or Head of Operations, the decision made, the rationale, and any action taken must be recorded on the electronic case file.

A Section 16A risk assessment must not delay the making of a safeguarding referral or any urgent protective action.

A Section 16A risk assessment must not be used as a substitute for a Child Impact Report or other ordered assessment. It should be used where new information or analysis gives cause to suspect current risk of harm to the child and the court needs to be informed.

PD12J Considerations in Private Law Cases

In private law proceedings where domestic abuse, coercive control, harm or risk of harm is alleged, identified or suspected, practitioners must ensure that safeguarding analysis is informed by the principles of Practice Direction 12J. Practitioners should consider:

- whether the child may be at risk of harm directly or indirectly;
- the impact of domestic abuse, coercive control, intimidation or fear on the child and adult victim-survivor;
- whether proposed arrangements for family time are safe and, in the child's, best interests;
- whether further safeguarding information, local authority involvement, police information, specialist domestic abuse information or urgent court consideration is required;
- whether any recommendation may expose the child or adult victim-survivor to further risk;
- whether protective measures are required within the court process or any proposed arrangements.

Where PD12J considerations are relevant, the practitioner's analysis and rationale must be clearly recorded and appropriately communicated to the court.

14. Professional Challenge and Escalation

Safeguarding responsibilities do not end once a concern has been shared or a safeguarding referral has been made. Where practitioners or managers believe that safeguarding concerns have not been appropriately addressed, they must consider whether professional challenge or escalation is required. Professional challenge and escalation may be required where:

- the response from another agency does not appear proportionate to the level of risk;
- a safeguarding referral is closed with no further action but Cafcass Cymru remains concerned about risk;
- relevant information does not appear to have been considered;
- there is drift, delay or lack of clarity about protective action;
- there is professional disagreement about threshold, risk, safety planning or the need for further action;
- Cafcass Cymru considers that the court may need to be made aware of unresolved safeguarding concerns.

Professional challenge should be evidence-based, respectful, proportionate, focused on the child's welfare and safety, and directed towards achieving a safer outcome.

Where concerns remain unresolved, the practitioner must discuss the matter with a Practice Manager. The Practice Manager must consider whether further clarification, renewed referral, written challenge, use of local escalation arrangements, or senior management involvement is required.

Heads of Operations must be involved where escalation is required, including safeguarding outcome disputes, repeated unresolved concerns, or cases where inter-agency disagreement may lead to ongoing or unmanaged harm. All professional challenge and escalation activity must be recorded clearly and contemporaneously, including:

- the concern;
- the agencies or professionals involved;
- the safeguarding analysis;
- management oversight;
- actions agreed;
- responses received;
- outcome;
- any further action required;
- any court communication required.

15. Allegations Against Colleagues, Professionals and Persons in Positions of Trust – Section 5 Wales Safeguarding Procedures

Allegations against professionals (including Cafcass Cymru colleagues), volunteers, carers or persons in positions of trust must be managed in accordance with Section 5 of the Wales Safeguarding Procedures.

Consideration should be given to whether these procedures apply where information suggests that an individual:

- has harmed or may have harmed a child or adult at risk;
- may have committed a criminal offence against a child or adult at risk;
- may pose a risk of harm to a child or adult at risk; or
- has behaved in a way that raises concerns about their suitability to work with children or adults at risk.

Allegations of this nature must be discussed promptly with a Practice Manager and escalated to the relevant Head of Operations. The Practice Manager and Head of Operations must consider whether there is immediate risk, ongoing risk or potential transferrable risk to other children or adults and determine what safeguarding action may be required**.**

Each local authority has its own arrangements for receiving reports concerning practitioners and persons in positions of trust. The Head of Operations must identify and follow the appropriate local authority referral route, including how to contact the Local Authority Designated Officer (LADO) or Designated Officer for Safeguarding (DOS). This may require checking the local authority's published safeguarding information or contacting the relevant Regional Safeguarding Board. Where there is uncertainty about whether Section 5 applies, advice must be sought from the LADO or DOS.

Risk analysis, decision-making and rationale must be clearly and contemporaneously recorded. Cafcass Cymru colleagues must cooperate with safeguarding enquiries, strategy discussions and multi-agency safeguarding processes.

Safeguarding processes are separate from disciplinary, capability, professional regulatory or criminal investigations, although these may operate in parallel. Safeguarding decisions must remain focused on welfare and safety and must not be delayed by employment or other internal processes.

16. Elective Home Education

Where Cafcass Cymru becomes aware of information suggesting that a child who is electively home educated may be at risk of abuse, neglect or other harm, practitioners should consider whether safeguarding action is required. This includes situations where elective home education appears to form part of a wider pattern of isolation, concealment, coercive control, unmet need or reduced professional visibility.

Where relevant, practitioners should consider whether a safeguarding referral is required. The rationale for any decision made must be clearly and contemporaneously recorded.

17. Governance, Assurance and Learning

Safeguarding governance arrangements will include oversight of:

- safeguarding referrals and their outcomes;
- professional challenge and escalation activity;
- allegations against colleagues, professionals and persons in positions of trust;
- patterns of transferrable risk;
- the quality of safeguarding recording and management oversight; and
- learning arising from audits, complaints, reviews and safeguarding activity.

Safeguarding compliance will be monitored through management oversight, audit and review. Learning identified through safeguarding activity will be used to inform practice improvement, workforce development and organisational learning.

Heads of Operations must ensure that safeguarding risks, referral outcomes, escalation activity and learning are identified, reviewed and acted upon through established management arrangements.

Where a safeguarding concern is identified retrospectively through an audit or other internal review process, it must be escalated to the relevant Head of Operations or Head of Practice. The Head of Operations or Head of Practice, in consultation with the Deputy Chief Executive, must determine whether safeguarding action is required. Where appropriate, the practitioner and their line manager must be involved in this consideration to ensure that relevant information, professional analysis and any action already taken are considered and recorded.

18. Workforce Safeguarding Arrangements

Cafcass Cymru recognises that effective safeguarding depends upon a skilled, supported and accountable workforce. Arrangements include:

- safer recruitment;
- appropriate DBS checks for colleague roles, proportionate to role and responsibilities;
- mandatory safeguarding awareness;
- role-specific safeguarding training;
- awareness of Wales Safeguarding Procedures arrangements relating to practitioners and persons in positions of trust;
- access to management consultation and professional support;
- whistleblowing and safeguarding reporting arrangements;
- quality assurance and organisational learning.

This procedure does not include a requirement that recommendations relating to prospective foster carers, special guardians or family carers must be withheld pending receipt and consideration of DBS or other checks, unless such a requirement is separately adopted by Cafcass Cymru as an organisational policy position. Where recommendations are made subject to outstanding checks, any limitations, caveats or safeguarding considerations must be clearly identified for the court.

19. Review and Version Control

This procedure will be reviewed every two years, or sooner in response to:

- legislative change;
- changes to Wales Safeguarding Procedures;
- changes to statutory guidance;
- learning from audits, reviews, complaints or safeguarding activity;
- significant changes to Cafcass Cymru safeguarding arrangements.

Version control, approval and publication arrangements will be maintained in accordance with Cafcass Cymru governance requirements.