



## **Safeguarding Policies and Procedure**

All information in this Policy was up to date at the time of its creation. This policy is to be used alongside working practice. For the policy the role of the Designated Safeguarding Officers currently resides within the management team.

Link to Change works in line with local authority and national recommended safeguarding practices.

### **Aims of the Policies**

- Will ensure that all staff, volunteers and trustees see it as part of their duty of care to be alert to signs of abuse.
- To ensure that staff, volunteers and trustees are carefully selected and trained in safeguarding procedures.
- To ensure that all children, young people and adults at risk work in safe environments with people they can trust.
- To ensure that all risks that children, young people and adults at risk encounter are carefully assessed and all necessary steps are taken to minimise and manage them (see general risk assessment).
- To ensure that prompt and appropriate action is taken where there is concern that there may be a threat to the wellbeing of a child, young person or adults at risk.
- To ensure that parents, children, young people and adults at risk know how to voice concerns about anything they may not be happy with.

### **Objectives of the Policies**

- To implement clear staff, volunteer and trustee selection and recruitment procedures, which include, in all circumstances;
  - A Disclosure and Barring Service (DBS) check. Portability will be allowed if registered appropriately.
  - Completed application form.
  - Two references, one from their last employer and another from somebody who has worked with them either on a voluntary or professional basis. For volunteers an alternative reference could be from a respected figure within their community. Both references will be followed up verbally.
  - An interview.
- To provide all staff, volunteers and trustees with this policy.
- All staff, volunteers and trustees will agree to abide by its procedures.
- All staff, volunteers and trustees will report any concerns to the management team.
- All members of staff, volunteers and trustees will follow this procedure.
- All confidential information will be kept securely by the organisation.
- Staff, volunteers and trustees will attend relevant training on a regular basis to ensure that Link to Change can take appropriate action when required.

### **Implementation and Monitoring**

- If anyone feels that the Link to Change has failed to meet the practice contained in this policy, they will be encouraged to use the Link to Change's Complaints and/or Grievance Procedure.
- The Board and Senior Management team have the responsibility for ensuring the effective implementation and monitoring of this policy.
- Every member of staff, volunteer and trustee also has a personal responsibility to implement this policy through his or her practice. This Policy forms part of the Employment Terms & Conditions between the individual (including volunteer and trustees), and Link to Change.
- The CEO will draw attention to policy and procedures on a regular basis and update staff, volunteers and trustees of any changes immediately.



## Introduction

Link to Change is fully committed to safeguarding the welfare of all children, young people and adults at risk who come into contact with its services, by protecting them from physical, sexual and emotional harm and neglect. All individuals without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.

**Neglect:** The persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of the individual's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Sexual Abuse:** Involves forcing or enticing a child, young person or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the individual is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving the individual in looking at, or in the production of, sexual images, watching sexual activities, encouraging individuals to behave in sexually inappropriate ways, or grooming an individual in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

**Emotional Abuse:** The persistent emotional maltreatment of an individual such as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to an individual that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the individual opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on individuals. These may include interactions that are beyond an individual's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the individual participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing individual's frequently to feel frightened or in danger, or the exploitation or corruption of an individual. Some level of emotional abuse is involved in all types of maltreatment of an individual, though it may occur alone.

**Physical Abuse:** A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to an individual. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Sexual Exploitation:** sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child, young person or adult at risk to participate in sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Sexual exploitation does not always involve physical contact; it can also occur through the use of technology.



**Criminal Exploitation:** As set out in the [Serious Violence Strategy](#), published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child, young person or adult at risk into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

**Extremism:** Extremism goes beyond terrorism and includes people who target the vulnerable including the young by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

**Female Genital Mutilation:** FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

**Domestic Violence/Abuse:** Any incident or pattern of incidents of controlling, coercive or 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. This can encompass, but is not limited to, the following types of abuse:

- Psychological
- Physical
- Sexual
  - Financial
- Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. The Government definition, which is not a legal definition, includes so called 'honour' based violence, including FGM and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

**Trafficking:** Trafficking and modern slavery are abuse. Children, young people or adults at risk are recruited, moved or transported and then exploited, forced to work or sold. They are trafficked for: [sexual exploitation](#), benefit fraud, forced marriage, domestic servitude such as cleaning, childcare, cooking, forced labour in factories or agriculture, criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft. Many are trafficked into the UK from abroad, but they can also be trafficked from one part of the UK to another.



## **Introduction to Exploitation**

Exploitation is rarely visible on the streets. In any event, street based exploitation of children, young people and adults at risk is only a small part of the bigger picture of the exploitation of adults and their peers. Exploitation can include a wide variety of different types of abuse, including; sexual, criminal and physical.

A growing number of those that are being exploited are exploited by adults, older young people or young people their own age they meet via the internet. This technological access to groom others for abuse has contributed to the invisibility of the exploitation of children, young people and vulnerable adults.

Victims can be any age. They come from all cultures and backgrounds and include a significant proportion of children who are “looked after”. Vulnerability and low self-esteem are the most common factors amongst those who are at risk of being exploited.

Peers who are already involved sometimes draw others into exploitation. Individuals can be coerced by adults who pose as friends or potential partners and may be physically and emotionally dependent upon them. This dependence may be reinforced by giving something that the victim may need or want. Over time, access to friends and family often becomes curtailed and the individual becomes alienated from agencies that may be able to identify and interrupt the abuse.

It is important to identify perpetrators, including alleged perpetrators, to the police through identified channels, so that they can respond to concerns and take appropriate action in respect of any criminal offences. Criminal exploitation can often involve the commissioning of the offences of ‘slavery, servitude and forced or compulsory labour’ and ‘human trafficking’ as defined by the Modern Slavery Act 2015.

Link to Change recognises the difficulty that many vulnerable young people have with transition to adult services; therefore, Link to Change’s projects are open to young people up to their 26<sup>th</sup> birthday. Link to Change also recognises that children with disabilities are also vulnerable to sexual exploitation.

## **Principals**

The principals underpinning our service delivery are that exploitation requires a multi-agency response and that:

- Exploitation includes sexual, physical, child and emotional abuse, as well as, in some cases, neglect.
- Children, young people and adults at risk do not make informed choices to enter or remain in exploitation, but do so from coercion, enticement, manipulation or desperation.
- Children under 16 cannot consent to sexual activity and sexual activity with children under the age of 13 is statutory rape.
- Exploited children, young people and adults at risk should be treated as victims of abuse, not as offenders. Children under 18 will always be dealt with as actual or potential victims.
- Many sexually exploited individuals have difficulty distinguishing between their own choices around sex and sexuality and the sexual activities they are coerced into. This potential confusion needs to be handled with care and sensitivity.
- The primary law enforcement effort must be against the coercers and abusers, who may be adult, but could also be the child’s peers or young people who are older than the individual. Potential perpetrators should be identified and referred to the police as part of the multi-agency process. Prosecutions should be brought against the perpetrators under the relevant laws and legislation.



- Multi-agency evidence gathering is part of the process of disrupting perpetrators. Link to Change is committed to sharing information which will serve to protect individuals and convict perpetrators. There is no conflict with service user confidentiality policies.

### Referral

When a referral is received with concerns about possible exploitation the services manager or other relevant member of staff should use the toolkit and assessment guidance in this protocol to form a view about whether the child, young person or adult 'at risk' appears to be at low, medium or high levels of exploitation. If the allocated practitioner has any doubts or concerns of the risk assessment, they should immediately consult their manager.

'Risk' should be defined using the accepted toolkit and assessment developed by the National Working Group and safeguarding children's board and adopted by Link to Change.

### Toolkit and Assessments

The needs of children, young people and adults at risk who are being or are likely to be exploited will change over time. Service responses need to be flexible to respond to these changes. Early intervention is essential to prevent escalation of harm.

While most interventions with those children and young people whose needs are in Level 1 will be preventative work and early intervention, emergency crisis intervention might be required.

Interventions with children and young people who have been identified as having in their lives risk factors in Levels 2 and 3 should be coordinated by the lead professional identified from a multi-agency team. Assertive and therapeutic outreach is likely to be required by specialist trained exploitation practitioners when a child, young person or adult at risk has been identified as having risk factors in Level 2 and it is recommended as being necessary for those categorised as having Level 3 risk factors present. Link to Change will provide therapeutic outreach to children and young people identified at risk level 1 and 3.

An exit from exploitation is possible from any of the stages. Experience has shown that children and young people can be supported away from exploitation where LSCBs have an active protocol, a group of professionals have allocated responsibility for monitoring young people's progress and a dedicated service is provided within the area. Link to Change will work with specialist multi-agency taskforces such as a MASH to protect individuals from exploitation.

**This toolkit framework indicates when intervention, support and action are required for children, young people and adults at risk at any given time. The assessment should be made on the basis of known risk indicators or immediate vulnerability factors, as well as recognition of a history of disadvantage or background vulnerability factors.**

The toolkit diagram can be used to enable all professionals to be aware of the types of indicators of harm likely to be present when a child or young person is being or is likely to be exploited. Identifying the presence of these factors can help professionals decide what level and types of interventions may be appropriate. Link to Change follows the guidance on exploitation toolkits from the Local Authority the referral is received from. These decisions about services provision should also address relevant information relating to the individuals personal and family history including:

- Social exclusion (exclusion/truancy from school, from health services)
- Poverty and deprivation



- Prior experience of sexual, physical and/or emotional abuse
- Prevalence of informal economies
- Familial and community offending patterns
- Prevalence of undiagnosed mental health problems

An assessment can be used to enable all professionals to be aware of the types of indicators of harm likely to be present when an individual is being or is likely to be exploited. Identifying the presence of these factors can help professionals decide what level and types of interventions may be appropriate.

The needs of children, young people and adults at risk who are being or are likely to be exploited will change over time. Service responses need to be flexible to respond to these changes. Early intervention is essential to prevent escalation of harm.

**Level 1-Low Risk:**

A vulnerable child, young person or adult at risk, who is at risk of being targeted and groomed for exploitation.

**Level 2- Medium Risk:**

A child, young person or adult at risk, who appears to be targeted for opportunistic abuse through the exchange of sex for drugs, accommodation (overnight stays) and goods etc. Coercion and control are likely to be significant factors.

**Level 3- High Risk:**

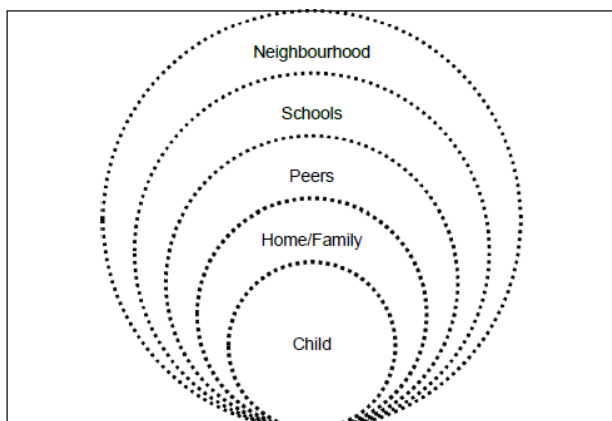
A child, young person or adult at risk whose exploitation is entrenched. Coercion and control is implicit in such situations.

**Information Sharing**

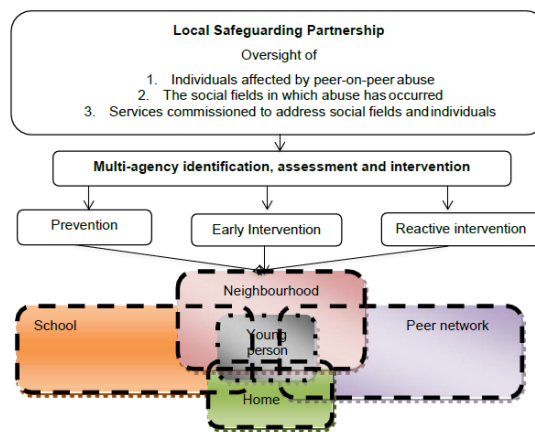
Please see the information sharing policy and procedure for more details.

**Contextual Safeguarding**

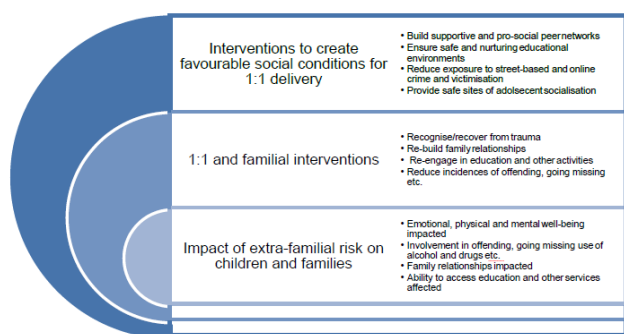
Contextual safeguarding is an approach developed by the University of Bedfordshire (Firmin 2017) to understanding, and responding to an individual's experiences of significant harm beyond their families. It expands the objectives of the child protection systems in recognition that children and young people are vulnerable to abuse in a range of social contexts. It recognises the weight of peer influence on the decisions that children and young people make, extends the notion of 'capacity to safeguarding' to sectors that operate beyond families and provides a framework where referrals can be made for contextual interventions. Link to Change considers and operates under a contextual safeguarding framework with all of its children, young people and vulnerable adults.



Contexts of Adolescent Safety and Vulnerability (Firmin 2013)  
Framework (Firmin 2015)



Contextual Safeguarding



Role of Contextual Interventions (Firmin 2016)



Four domains of Contextual Safeguarding

(Firmin 2016)

## Procedures

### Working Ratios

The Department of Education (DoE) no longer provides guidance in relation to working ratios with children over five. Link to Change suggests the following ratios, which have been agreed as a sensible ratio by the DoE:

- A ratio of 1:4 where the element of risk would be similar to the risks encountered in everyday life
- A ratio of 1:4 for all day and residential events and trips
- A ratio of 1:3 for children under the age of 10, or groups with special needs
- A ratio of 1:2 for high risk activities
- 1-2-1 appointments must be carried out in a risk assessed environment

The above ratios are for Link to Change organised activities, staff may attend externally organised youth activities with different ratios by agreement between the organisations.

### Risk Assessment and Lone Working

Link to Change has a risk assessment and lone working policy and guidance that must be followed when either working on a 1-2-1 basis or any other activities with multiple service users.





### **Link to Change requires:**

- Employees to attend recognised Safeguarding awareness training every two years.
- Volunteers to complete recognised awareness training on Safeguarding Policies and Procedures.
- Relevant personnel, such as the designated safeguarding officer, to receive advisory information and training outlining good practice and informing them about what to do if they have any concerns about children or young people's safety.
- Attendance of updated training when necessary.

### **Link to Change's Statutory Obligations**

Link to Change is under statutory obligation to inform the appropriate authorities:

1. Where there is knowledge or suspicion of exploitation
2. Where there is knowledge or suspicion of concealment of money made through drug trafficking (non-disclosure is an offence under the Drug Trafficking Act 1989, section 27)
3. Where there is knowledge or suspicion of an act of terrorism
4. Where there is knowledge or suspicion of human trafficking
5. Where there is knowledge or suspicion of modern slavery

Clients will not be informed of such action, as this would also constitute an offence.

### **Safeguarding Leads at Link to Change**

Hayley Brown- Chief Executive  
Kelly Panaghiston- Operations Manager  
Amy Archer- Services Manager  
Fiona Factor- Board of Trustees

A handwritten signature in black ink, appearing to read "Hayley Brown". The signature is fluid and cursive, with a long horizontal stroke at the end.

Signed by Hayley Brown- Chief Executive

Reviewed and Approved: February 2025

Reviewed and Approved: April 2024

Reviewed: April 2024

Approved by the Board: October 2022

Reviewed: December 2020

Approved by Board: January 2021





## **Safeguarding Policy Statement**

### **The Purpose**

The purpose of this policy statement is:

1. To protect children, young people and adults who receive Link to Change's services from harm. This includes the children of adults who use our services.
2. To provide staff and volunteers, as well as children, young people, adults and their families, with the overarching principles that guide our approach to child protection.

This policy applies to anyone working on behalf of Link to Change, including senior managers and the board of trustees, paid staff, volunteers, sessional workers, agency staff and students.

### **Supporting Documents**

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents, including:

- Dealing with disclosures and concerns about a child or young person.
- Managing allegations against staff and volunteers.
- Recording concerns and information sharing.
- Child protection records retention and storage.
- Code of conduct for staff and volunteers.
- Photography and sharing images guidance.
- Safer recruitment.
- Acceptable IT usage.
- Managing complaints.
- Whistleblowing.
- Health and safety.
- Induction, training, supervision and support.
- Adult to child supervision ratios.

### **We Believe That:**

- Children, young people and adults should never experience abuse of any kind.
- We have a responsibility to promote the welfare of all children, young people and adults, to keep them safe and to practise in a way that protects them.

### **We Recognise That:**

- The welfare of an individual is paramount in all the work we do and in all the decisions we take.



- Everyone, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
- Some individuals are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- Working in partnership with children, young people, adults, their parents, carers and other agencies is essential in promoting young people's welfare.

**We will seek to keep children, young people and adults safe by:**

- Valuing, listening to and respecting them.
- Appointing 3 nominated safeguarding leads for children, young people and adults and a lead trustee/board member for safeguarding.
- Adopting safeguarding best practice through our policies, procedures and code of conduct for employees and volunteers.
- Developing and implementing an effective online safety policy and related procedures.
- Providing effective management for employees and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently.
- Recruiting and selecting employees and volunteers safely, ensuring all necessary checks are made.
- Recording, storing and using information professionally and securely, in line with data protection legislation and guidance.
- Sharing information about safeguarding and good practice with children and their families via leaflets, posters, group work and one-to-one discussions.
- Making sure that children, young people, adults and their families know where to go for help if they have a concern.
- Using our safeguarding procedures to share concerns and relevant information with agencies, who need to know, and involving children, young people, adults at risk, parents, families and carers appropriately.
- Using our procedures to manage any allegations against employees and volunteers appropriately.
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Ensuring that we provide a safe physical environment for our children, young people, adults, employees and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.
- Building a safeguarding culture where employees and volunteers, children, young people, adults and their families, treat each other with respect and are comfortable about sharing concerns.

**Contact Details**

**Nominated Child Protection Leads:**

Hayley Brown- Chief Executive

[Hayley@linktochange.org.uk](mailto:Hayley@linktochange.org.uk)

07856 587179

Kelly Panaghiston- Operations Manager

[Kelly@linktochange.org.uk](mailto:Kelly@linktochange.org.uk)

07856 588225

Amy Archer- Services Manager

[amy@linktochange.org.uk](mailto:amy@linktochange.org.uk)

07552 713677



**Trustee for Safeguarding and Child Protection:**

Fiona Factor

[f.factor@ntlworld.com](mailto:f.factor@ntlworld.com)

07775 853028

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Approved by Board:

Reviewed: December 2019

Approved by the Board: January 2020



## Safeguarding Children and Young People

**Definition** (*Working Together 2018*):

**Children and Young People:** Anyone under the age of 18 years.

### **Purpose of Policy**

The purpose of this children and young people's safeguarding policy is to ensure the safety, wellbeing, and protection of children and young individuals from all forms of harm, abuse, neglect, and exploitation. Such policies outline clear guidelines, procedures, and responsibilities for all stakeholders involved in the care and support of children and young people, including parents, caregivers, educators, social workers, and community members. By establishing a robust safeguarding framework, these policies aim to prevent potential risks, identify and address any concerns promptly, and promote a nurturing environment where children and young people can thrive and reach their full potential, free from harm or threat to their safety.

### **Involving Children and Young People and their Parents**

In broad terms the guidance provided in *Working Together* and *Child In Need* guidance should be followed, as appropriate. However, exploitation requires careful handling and consideration of some particular factors. Neither parents nor children/young people should be present when professionals discuss strategies to address exploitation that go beyond the specific needs or situation of an individual child/young person. Care should be taken to separate out discussions about the risks to and needs of a particular child or young person, and discussion about police investigations, or on any action being taken to address exploitative activity by adults or young people from outside the family.

Care should be taken when offering therapeutic interventions with a child who may also be required to give evidence. Refer to *Provision of Therapy for Child Witnesses Prior to a Criminal Trial: Practice Guidance* ([www.cps.gov.uk](http://www.cps.gov.uk)). It may not always be possible to offer immediate 1-2-1 support until evidence has been captured, in order to avoid compromising the police case and limiting chances of a successful prosecution. This may be difficult for the specialist exploitation worker and should be discussed in clinical supervision. There is no reason why the child cannot be dealt with sympathetically during this time as long as the lead is taken by the police.

As with all professionals and other relevant social care meetings that involve children and young people, care should be taken to consider the impact and appropriateness of their direct involvement and information sharing. In cases of exploitation, it will be necessary to consider:

- The child's age and level of maturity, considering learning difficulties and any mental health issues.
- The child's perception and interpretation of their involvement.
- Patterns and frequency of any behaviour causing concern.
- Identity and role of adults involved.
- Age and maturity of other participants – and their right to confidentiality.
- Nature of the activity, who is controlling the activity, where is it taking place.
- The actual and potential physical and emotional effects.
- Whether any physical injuries have been caused.
- Existence of substance misuse and their significance for the child's behaviour.
- Likely reaction of parents/carers.
- Likely reaction of peers.
- Need for medical treatment.

Interventions to interrupt abuse through exploitation and support children and young people to recover a healthy lifestyle are more likely to be successful if carried out as therapeutic outreach. Allowances must be



made for resistance from the child or young person, who may perceive that their loyalties lie with the perpetrator. The exploited child or young person may display very challenging behaviour at this time. Appointments may be frequently missed. Cases will be required to be kept open for a long time. Link to Change accepts that it will be faced with all of these behaviours and will remain non-judgmental and patient.

### **Looked After Children**

Children and young people who are looked after are at particular risk because they may not have put down roots in the community and may not have a network of friends 'looking out' for them. Concerns about a child or young person who is looked after, should be dealt with as any other child or young person in respect of all processes for making enquiries and risk assessment. Social Care will usually lead on looked after children cases and a risk management meeting is to be held at all times. This will also need to cover:

- The risks to and impact on other children or young people in the placement.
- Whether the child or young person should remain in their present placement.
- The feasibility of controlling the child or young person's movements and the likely effects of doing so.

There are separate procedures for dealing with children looked after in accordance with Children's Homes and Fostering National Standards and Regulations.

As long as the above is taken into account there is no reason why a looked after child cannot receive the same therapeutic outreach services as any other young person that the specialist worker will come into contact with. Foster parents and care home staff may require similar support as birth parents and may feel equally helpless in the face of grooming.

### **Children and Young People Who Are Leaving Care**

The same procedures as above should be followed in cases where young people in the Leaving Care Team are considered to be at medium or high risk of abuse through exploitation.

The Leaving Care Plan for any young person where there are concerns about sexual exploitation should specifically identify their vulnerability to exploitation, and address the factors known to impede successful recovery from exploitation e.g. homelessness, poverty, lack of educational and employment opportunities and lack of supportive social contacts.

It may be particularly appropriate for Link to Change specialist worker to become involved with a care leaver at risk if they are also leaving the young people's service because of their birthday. Vulnerable care leavers can remain involved with Link to Change until their 26<sup>th</sup> birthday and this will assist their transition to adult services.

It is important to recognise that perpetrators may scale up abuse of victims once they leave care and the victim may feel increasingly powerless at this time.

### **Involvement of Groups of Children and/or Young People**

Where there is knowledge, or strong suspicion that children and/or young people are involved in exploitation together, or are being controlled by the same person, particularly when that person is a child or young person, there will need to be additional planning, including consideration of the use of child protection and/or organised abuse procedures.

Link to Change should implement evidence gathering and distribute information to all practitioners involved and evidence compared at case conferences/child in need meetings.



It is important to gather and protect evidence to aid disruption and prosecution.

### **Role of the Police**

The priority for the police is the investigation and prosecution of perpetrators who have been involved in abusing the child or young person through exploitation. This role should be undertaken in accordance with the principle of multi-agency co-operation to safeguard individuals.

Care should always be taken not to offer a therapeutic intervention with a child or young person until all evidence has been gathered. The practitioner should take a lead from the police in this matter so that the prosecution of a case is not compromised. The individual can still be dealt with sympathetically and the specialist worker should discuss their feelings around withholding support at clinical supervisions.

Police Officers may become aware of individuals being involved in exploitation through normal police work on the streets and in other criminal investigations.

The initial Police response to the discovery of an individual who is being, or is at immediate risk of being abused through exploitation, must be to remove them from the source of harm and ensure that the necessary evidence is secured. This action must be followed by referral to Children's Social Care or Adults Social Care – with the expectation that local authority safeguarding guidance will be followed.

If there are suspicions that an individual is involved in exploitation, but no immediate or direct evidence is available the police officer noting the concern should refer to the local Police in their area. If a crime has been committed the matter will be allocated to an appropriately trained officer to investigate.

### **Modern Day Slavery Protocol**

If a trafficked young person under the age of 18 year is discovered, the following considerations must be taken into account:

- If the person is in the country illegally the UK Border Agency may remove them from the country. This does not mean that police protection is inappropriate. It is important that traffickers are prosecuted. Do not promise the young person that they will receive the services that a UK resident would be awarded; however, while they are in our area, they should get sympathetic therapeutic interventions as usual.
- They may be eligible to apply for protection under the National Referral Mechanism (NRM). Advice can be sought from the National Crime Agency (Home Office) or the National Working Group (NWG).  
*The NRM grants a minimum 45-day reflection and recovery period for victims of human trafficking or modern slavery. Trained decision makers decide whether individuals referred to them should be considered to be victims of trafficking. In England and Wales, further consideration is made to those who do not meet the definition of trafficking. Their cases are then considered against the definitions of slavery, servitude and forced or compulsory labour.* (<http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>)
- They may not be entitled to any benefits or anywhere to stay.
- One worker should not attempt to deal with a trafficked adult alone. Discuss with the manager who will contact first responder agencies working in this area of responsibility such as the Unseen or Barnardo's.
- Social care should be contacted and they will be afforded full support in the same way as any other child.
- Modern Slavery is now incorporated into the above legislation.

### **Intelligence Sharing**

Intelligence is collected information that is used to build a picture of current trends or patterns, in order to assist the police to prevent, investigate and disrupt crime. Intelligence collection is a continuous process, and



any intelligence shared will be risk assessed by the police. There may be local requirements for its recording and use. Information disclosed might not be directly related to the safeguarding of the child or young person disclosing it. However, this intelligence may lead to the safeguarding of many others, so should be treated in the same way. Intelligence can be captured in any situations where children and young people are present.

The Children's Society offers the below examples of intelligence that may arise when speaking to children and young people:

CATEGORY	EXAMPLE OF INTELLIGENCE
<b>PEOPLE</b>	Names/nicknames/characteristics/ descriptions/movements of perpetrators/ boyfriends/other children or young people/ associates/parents, carers or family members of other young people.
<b>OTHER CHILDREN AND YOUNG PEOPLE</b>	Any information about other children or young people who are mentioned. Consider all information ie school/area/ school uniform/approximate age.
<b>PLACES</b>	Where young people are congregating, possible hotspot locations for child sexual exploitation, and activities observed. Includes names of areas/ housing/playgrounds/ shops/places/ schools/clubs/takeaways/substance misuse/times/numbers of children and young people, and age/descriptions of adults present.
<b>TRAVEL</b>	Methods, timings, times and routes of travel, ie bus route/oyster card details/ vehicle number plates.
<b>ONLINE</b>	Names of apps/online sites being used by children and young people.
<b>SUBSTANCES</b>	Names of drugs/alcohol being used (this can include slang names). Any details of where they are being purchased.
<b>NATIONAL</b>	Names of out of borough links.

CATEGORY	EXAMPLE OF INTELLIGENCE
<b>CONTACT DETAILS</b>	Phone numbers (belonging to vulnerable persons, victims, or perpetrators)/social media contact names or identifiers.
<b>BUSINESSES</b>	Names of businesses/hotels/taxi driver companies being used or frequented.
<b>CLOTHING</b>	Descriptions of particular types of clothing.
<b>GANGS</b>	Names of gangs/rival gangs/rivalries, or crimes being committed in groups/ networks/with weapons.
<b>ABUSE OR EXPLOITATION</b>	Any indicators of child sexual abuse or exploitation, ie grooming/gifts. <b>Note:</b> Any such indicators must also be escalated as a safeguarding concern.





## **Assessing Help- Children and Young People**

### **Early Help**

Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising; for example, if it is provided as part of a support plan where a child has returned home to their family from care, or in families where there are emerging parental mental health issues or drug and alcohol misuse.

Local authorities, under section 10 of the Children Act 2004, have a responsibility to promote inter-agency co-operation to improve the welfare of all children.

### **Section 17- Child in Need**

A Child in Need assessment is taken from the Children Act 1989. The assessment undertaken by a social worker, forms the platform for the child (where appropriate) and relevant professionals to share information, identify need and agree the most effective multi-agency plan to meet those in need with measurable outcomes within a stated timescale. This is determined and worked in line with the thresholds of the local authority.

The Children Act 1989 states that a child shall be considered "in need" if:

- They are unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision of services by a local authority;
- Their health or development is likely to be significantly impaired, or further impaired, without the provision of such services; and/or
- They are disabled.

### **Section 47- Child Protection**

A section 47 of the Children Act 1989 requires the local authority to make enquiries to enable it to decide whether action is required to safeguard and promote the wellbeing of the child. The purpose of the Assessment is to determine whether the child is suffering, or likely to suffer significant harm and to assess whether action is required to safeguard and promote the child's welfare. Health, education and other services have a statutory duty to help Children's Social Care to carry out the Section 47 Enquiry. Social workers will work with the police in the case of a criminal investigation.

### **Section 20- Looked After Child provided with accommodation with the Local Authority**

(This can be on the initiative of the local authority with the agreement of the parents, or at the request of the parents. Any person with parental responsibility can at any time remove the child from the accommodation.)

The child is a child in need who requires accommodation as a result of:

- Having no person with parental responsibility for him/her; or
- Being lost or abandoned; or
- The person who has been caring for him/her being prevented (whether or not permanently, and for whatever reason) from providing him/her with suitable accommodation or care; or
- Having reached the age of 16, his/her welfare is likely to be seriously prejudiced if he/she is not provided with accommodation; or
- Accommodating the child would safeguard or promote his/her welfare (even though a person who has parental responsibility for him is able to provide him with accommodation), provided that that person does not object.

### **Section 31- Initiation of Care Proceedings**

In order to initiate any care proceedings with a child or young person, they must be:

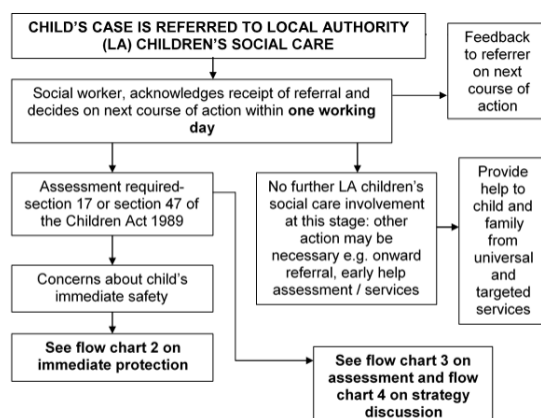


- Suffering, or is likely to suffer significant harm; and
- The harm, or likelihood of harm, is attributable to:
  - The care given to the child, or likely to be given to him if the order were not made, not being what it would be reasonable to expect a parent to give to him; or
  - The child's being beyond parental control.
- 'Harm' means ill-treatment or the impairment of health or development including, for example, impairment suffered from seeing or hearing the ill-treatment of another;
- 'Development' means physical, intellectual, emotional, social or behavioural development;
- 'Health' means physical or mental health; and
- 'Ill-treatment' includes sexual abuse and forms of ill-treatment which are not physical.

Where the question of whether harm suffered by a child is significant turns on the child's health or development, his/her health or development shall be compared with that which could reasonably be expected of a similar child.

### Action taken when a child is referred to local authority children's social care services

Flow chart 1: Action taken when a child is referred to local authority children's social care services



Taken from Working Together (2018)

### What if you suspect abuse or an allegation is made?

Abuse occurs when a person or group of people, harm a child or young person.

There are four categories of abuse commonly referred to as Neglect, Physical Abuse, Sexual Abuse and Emotional Abuse. This may come to your notice in a number of different ways:

- Where a child or young person tells you something has happened.
- A child or young person tells you about their concerns for another child, young person or adult at risk.
- You observe unexplained injury, or changes in behaviour, which give you cause for concern.
- You receive an allegation about any adult or about yourself.

When a child or young person speaks to you in confidence:

- Explain that you cannot keep what the child or young person tells you a secret.
- Allow the child or young person to speak, never interrupt. Even if you have an idea about the content of the sentence, never put words in, or finish the sentence for the child or young person. However difficult this may be, in the eyes of the law the information needs to come direct from the child or young person.
- Never question the child or young person or attempt to investigate.



- Reassure the child or young person risk that they have done the right thing.
- Most importantly LISTEN.
- Make notes using the child's or young person's own words. These should include the date and time, information about the details disclosed, together with a note of your own actions. Ensure that the appropriate information is filed confidentially in a locked filing cabinet at the main office or encrypted safely online.
- Follow the safeguarding flow chart protocol.
- Seek supervision, support from the Operations Manager/CEO. Abuse can be one of the most difficult and distressing areas of working with children or young people. Do not underestimate how it may make you feel.
- In an emergency (young person at imminent risk of significant harm), contact Police or Social Services using the flow chart and emergency numbers supplied. Inform your Line Manager of the action you have taken.

### **Procedures to Follow**

All concerns and allegations of abuse will be taken seriously by staff, volunteers and trustees and responded to appropriately. This may require a referral to social care services and the Police or the submission of Intelligence to the Police.

The Designated Safeguarding Leads for Link to Change are:

Hayley Brown- Chief Executive

Kelly Panaghiston- Operations Manager

Amy Archer- Services Manager

Fiona Factor- Board of Trustees

If you have a safeguarding concern:

- All information relating to the safeguarding concern is strictly confidential. It should only be discussed with:
  - - Line Manager, Operations Manager and/or CEO.
    - Social Care.
    - The Police.
    - Designated Safeguarding Officer at the school or community group.
    - Any other relevant professionals.
- Discuss your concerns with the appropriate person; this will be the Line Manager and/or CEO within Link to Change, who is responsible for the activity. Alternatively speak to a colleague.
- Follow Link to Change procedures for reporting safeguarding and the Link to Change Information Sharing Agreement policy.
- Ensure all records are timely, accurate and factual.
- Ensure all actions are completed within a 48hr window of the safeguarding concern/disclosure.

### **Additional incidents that must be reported/recorded**

If any of the following occur, you should report this immediately to your Line Manager, Operations Manager and/or Chief Executive and record the incident. You should also ensure the parents/carers/relevant professionals of the child or young person are informed:

- If you accidentally hurt a service user.
- If a service user seems distressed in any manner over and above the expectations of the referral.
- If a service user appears to be sexually aroused by your actions.
- If a service user misunderstands or misinterprets something, you have done.



### **A service user has an accident which does not require hospital treatment**

- The parents/carers/relevant professionals should be informed on their return.
- The accident should be recorded in the accident book – see Health and Safety Policy and Procedure.

### **Death of a service user whilst using our service**

- If a service user dies then Link to Change should have followed all emergency procedures as appropriate i.e. emergency first aid, emergency services.
- If a service user dies before the parents/carers/relevant professionals have been contacted, under no circumstances should they be told over the phone about the death. Link to Change should be advised by emergency services, or social services.
- The Link to Change employee or volunteer should contact the CEO and/or Operations Manager as soon as practical. The CEO should then inform the rest of the management committee and associated members as necessary.
- Link to Change must follow any insurance procedures as necessary.
- All client files must be kept up to date should they be requested for the investigation of the death of a service user.

### **Action if bullying is suspected**

If bullying is suspected, the same procedure should be followed as set out in 'concerns about suspected abuse' above.

### **Use of photographic/ filming equipment at youth activities or events**

Photographs of youth activities such as sporting events can be an opportunity to take inappropriate photographs or film footage of children and young people. All groups should be vigilant and any concerns should be reported to the CEO and/or Operations Manager.

Informed consent forms should be sought for children and young people under 18 years old, with regard to any material which could be used to identify them individually. Link to Change staff should not photograph clients unless the project has been agreed by the CEO and/or Operations Manager.

### **REMEMBER**

'The welfare of the child or young person is paramount'. Any adult has the right to report any concerns, or suspicions about another member of staff, volunteer or trustee in confidence and free from harassment. (See our Whistle Blowing Policy.)

If you are not able to follow these procedures due to not being able to contact the CEO and/or Operations Manager, it is essential that you seek advice from a Line Manager or Social Services immediately. Remember you can check out any issues or concerns, with the Emergency Duty Team at Social Services without giving personal details. E.g. 'If this situation was to happen what should I do?'

**You have a statutory duty under Section 11 of the 2004 Children Act to pass on any concern about a child.**

**If you have a concern, think "what if I'm right?" not "what if I'm wrong?"**

**No employee will suffer disciplinary action for acting upon concern for the wellbeing of a vulnerable child or young person.**

### **CODE OF BEHAVIOUR**

Staff, volunteers and trustees **MUST NOT:**



- X** Be alone with children and young people where a risk assessment has not been carried out. (See Lone Working Policy and Procedures)
- X** Transport children or young people in a private vehicle or mini bus without a risk assessment.
- X** Take children or young people to the worker's home under any circumstances.
- X** Make inappropriate contact/form a relationship with children or young people outside professional boundaries.
- X** Leave children or young people unattended.
- X** Leave children or young people in the presence of adults who are not suitably trained.
- X** Leave children or young people in the presence of adults not known to the member of staff, volunteer or trustee.
- X** Leave children or young people in the presence of adults who have not had a DBS check.
- X** Show favouritism to any child or young person engaged with the Link to Change such as giving or receiving gifts. Money should never be given, unless with specific permission for the CEO. (See Outreach Policy on buying food and other basic necessities for homeless and neglected young people.)
- X** Let allegations, suspicions, or concerns about abuse go unreported.

Staff, volunteers and trustees **MUST**:

- ✓ Put this code into practice at all times.
- ✓ Treat everyone with dignity and respect in accordance with the Human Rights Act.
- ✓ Set an example you would wish others to follow.
- ✓ Plan activities that involve more than one other person being present, or at least are within the sight and hearing of others, or follow Lone Working Procedures.
- ✓ Follow recommended adult/ young people ratios for meetings and activities.
- ✓ Allow the service user to talk about any concerns they may have.
- ✓ Encourage others to challenge any attitudes or behaviours they do not like.
- ✓ Make everyone aware of the Link to Change Safeguarding Policy and Procedures.
- ✓ Keep others informed of where you are and what you are doing (see Lone Working Policy and Procedures).
- ✓ Remember someone else might misinterpret your actions, no matter how well-intentioned.
- ✓ Take any allegations or concerns of abuse seriously and refer immediately.

**If you have any queries please speak to the CEO and/or Operations Manager. Do not wait for supervision or client case review to raise concerns.**

## CONTACTS

**Bedford Borough Children and Young People** – Contact the Multi Agency Support Hub (MASH): Office hours: **01234 718700**, Out of hours: **0300 300 8123**.

**Email:** [multiagency@bedford.gov.uk](mailto:multiagency@bedford.gov.uk) / [mash@bedford.gcsx.gov.uk](mailto:mash@bedford.gcsx.gov.uk).

**Bedford Central Children and Young People**- Contact the Access and Referral Hub on 0300 300 8585, or Duty Out of Hours on 0300 300 8123.

**Email:** [cs.accessandreferral@centralbedfordshire.gov.uk](mailto:cs.accessandreferral@centralbedfordshire.gov.uk)

**Luton Children and Young People** – Contact Multi-Agency Safeguarding Hub (MASH) on 01582 547653 on out of hours 0300 3008123.

**Email:** [mash@luton.gov.uk](mailto:mash@luton.gov.uk)

Reviewed and Updated: February 2025

Reviewed and Updated: April 2024

Approved by Board: April 2024



## **Safeguarding Adults at Risk**

**Definition** (*Working Together 2018*):

**Adults at Risk:** Anyone over 18 who is:

- Or may need community care services.
- Unable to care for themselves.
- Unable to protect themselves against significant harm or exploitation.

## **Purpose of Policy**

The purpose of this adults at risk safeguarding policy is to uphold the rights, dignity, and wellbeing of vulnerable adults, ensuring their protection from all forms of abuse, neglect, exploitation, and harm. This policy establishes clear guidelines, procedures, and responsibilities for all individuals and organisations involved in the care, support, and interaction with vulnerable adults, including caregivers, healthcare professionals, social workers, and community members. By implementing robust safeguarding measures, these policies aim to prevent risks, detect and respond to concerns promptly, and provide support and advocacy for those who may be at risk or experiencing harm.

## **Role of the Police**

The priority for the police is the investigation and prosecution of perpetrators who have been involved in abusing the adult at risk through exploitation. This role should be undertaken in accordance with the principle of multi-agency co-operation to safeguard individuals.

Care should always be taken not to offer a therapeutic intervention with an adult at risk until all evidence has been gathered. The practitioner should take a lead from the police in this matter so that the prosecution of a case is not compromised. The individual can still be dealt with sympathetically and the specialist practitioner should discuss their feelings around withholding support at clinical supervisions.

Police Officers may become aware of individuals being involved in exploitation through normal police work on the streets and in other criminal investigations.

The initial Police response to the discovery of an individual who is being or is at immediate risk of being abused through exploitation, must be to remove them from the source of harm and ensure that the necessary evidence is secured. This action must be followed by referral to Adults Social Care – with the expectation that local authority safeguarding guidance will be followed.

If there are suspicions that an individual is involved in exploitation, but no immediate or direct evidence is available the police officer noting the concern should refer to the local Police in their area. If a crime has been committed the matter will be allocated to an appropriately trained officer to investigate.

## **Trafficked Young Adults**

If a trafficked young person past their 18<sup>th</sup> birthday is discovered, the following considerations must be considered:

- If the person is in the country illegally the UK Border Agency may remove them from the country. This does not mean that police protection is inappropriate. It is important that traffickers are prosecuted. Do not promise the young person that they will receive the services that a UK resident would be awarded; however, while they are in our area, they should get sympathetic therapeutic interventions as usual.

- They may be eligible to apply for protection under the National Referral Mechanism (NRM). Advice can be sought from the National Crime Agency (Home Office) or the National Working Group (NWG).

*The NRM grants a minimum 45-day reflection and recovery period for victims of human trafficking or modern slavery. Trained decision makers decide whether individuals referred to them should be considered to be victims of trafficking. In England and Wales, further consideration is made to those who do not meet the definition of trafficking. Their cases are then considered against the definitions of slavery, servitude and forced or compulsory labour.* (<http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>)

- They may not be entitled to any benefits or anywhere to stay.



- One worker should not attempt to deal with a trafficked adult alone. Discuss with the manager who will contact first responder agencies working in this area of responsibility such as the UKHTC or Salvation Army.
- Modern Slavery is now incorporated into the above legislation.

## Assessing Help- Adults at Risk of Harm

### The Care Act 2014

The Care Act 2014 sets out the following principles that should underpin the safeguarding of vulnerable adults:

- *Empowerment*- People are supported and encouraged to make their own decisions and informed consent.
- *Prevention*- It is better to act before harm occurs.
- *Proportionality*- The least intrusive response appropriate to the risk presented.
- *Protection*- Support and representation for those in greatest need.
- *Partnership*- Services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- *Accountability*- Accountability and transparency in delivering safeguarding.

### The Mental Capacity Act 2005

When reporting a concern, you may need to gain the consent of the person involved, but this is not always possible. This is also known as a person's 'capacity' to understand what is happening.

The Mental Capacity Act states to have capacity a person must be able to:

- Understand the information that is relevant to the decision they want to make.
- Retain the information long enough to be able to make the decision.
- Weigh up the information available to make the decision.
- Communicate their decision by any possible means, including talking, using sign language, or through simple muscle movements such as blinking an eye or squeezing a hand.

It must always be assumed that everyone is able to decide for themselves, until it is proven that they cannot. The law says that the only way to establish this is to do a test or assessment to find out whether a person can make a particular decision at a particular time.

If you are making a safeguarding report because you are concerned that the person is at risk of harm, you should gain the person's consent to do this. You would gain their consent by giving them information about the safeguarding process and you should consider the following:

- Does the person understand what making a safeguarding notification means?
- That you will be sharing their personal details and information about their circumstances with Social Services?
- That this will mean the information will be saved on a data base and a record kept of their details and details of the issue?
- That this information may be shared with other agencies such as the Care Quality Commission, the Police or Health services?
- That someone from social services will be in contact with them and or their family to discuss the issue?
- Is the person able to decide if they want a Safeguarding concern made based on the information you have given them about what will happen?
- Is the person able to inform you what they want to happen given the information above?

If the person cannot consent to the notification being made you can still, make one in their best interests. If the person can consent but says No, they do not want a notification to be raised but you believe that other people are at risk of harm, you can still make the notification. You would need to explain this to the person and inform them that you have a duty to safeguard others who may be at risk from this practitioner.

### What if you suspect abuse or an allegation is made?

Abuse occurs when a person or group of people, harm an adult at risk.





There are four categories of abuse commonly referred to as Neglect, Physical Abuse, Sexual Abuse and Emotional Abuse. This may come to your notice in several different ways:

- Where an adult at risk tells you something has happened.
- An adult at risk tells you about their concerns for another child, young person or adult at risk.
- You observe unexplained injury, or changes in behaviour, which give you cause for concern.
- You receive an allegation about any adult or about yourself.

When an adult at risk speaks to you in confidence:

- Explain that you cannot keep what the adult at risk tells you a secret.
- Allow the adult at risk to speak, never interrupt. Even if you have an idea about the content of the sentence, never put words in, or finish the sentence for the adult at risk. However difficult this may be, in the eyes of the law the information needs to come direct from the adult at risk.
- Never question the adult at risk or attempt to investigate.
- Reassure the adult at risk that they have done the right thing.
- Most importantly LISTEN.
- Make notes using the adult's own words. These should include the date and time, information about the details disclosed, together with a note of your own actions. Ensure that the appropriate information is filed confidentially in a locked filing cabinet at the main office or encrypted safely online.
- Seek supervision, support from the management team. Abuse can be one of the most difficult and distressing areas of working with adults at risk. Do not underestimate how it may make you feel.
- In an emergency (at imminent risk of significant harm), contact Police or Social Services using the flow chart and emergency numbers supplied. Inform your Line Manager of the action you have taken.

### **Procedures to Follow**

All concerns and allegations of abuse will be taken seriously by staff, volunteers and trustees and responded to appropriately. This may require a referral to social care services and in emergencies, the Police.

If you are concerned that abuse has occurred:

- All information relating to an incident of abuse is strictly confidential. It should only be discussed with: -
  - The Management Team.
  - Social Care.
  - The Police.
  - Any other relevant professionals.
- Discuss your concerns with the appropriate person; this will be the Line Manager and/or CEO within Link to Change. Alternatively speak to a colleague.
- Follow Link to Change procedures for reporting safeguarding and the Link to Change Information Sharing Agreement policy.
- Ensure all records are timely, accurate and factual.
- Ensure all actions are completed within a 48hr window of the safeguarding concern/disclosure.

### **Additional incidents that must be reported/recorded**

If any of the following occur you should report this immediately to the management team and record the incident. You should also ensure the next of kin/relevant professionals of the adult at risk are informed:

- If you accidentally hurt a service user.
- If a service user seems distressed in any manner over and above the expectations of the referral.
- If a service user appears to be sexually aroused by your actions.
- If a service user misunderstands or misinterprets something, you have done.

### **A service user has an accident which does not require hospital treatment**

- The next of kin/relevant professionals should be informed on their return.



- The accident should be recorded in the incident/accident form and given to the management team or executive assistant – see Health and Safety Policy and Procedure.

### **Death of a service user whilst using our service**

- If a service user dies then Link to Change should have followed all emergency procedures as appropriate i.e. emergency first aid, emergency services.
- If a service user dies before the next of kin/relevant professionals have been contacted, under no circumstances should they be told over the phone about the death. Link to Change should be advised by emergency services, or social services.
- The Link to Change employee or volunteer should contact the management team as soon as practical. The management team should then inform the rest of the management committee and associated members as necessary.
- Link to Change must follow any insurance procedures as necessary.
- All client files must be kept up to date should they be requested for the investigation of the death of a service user.

### **Action if bullying is suspected**

If bullying is suspected, the same procedure should be followed as set out in ‘concerns about suspected abuse’ above.

### **Use of photographic/ filming equipment at youth activities or events**

Photographs of activities such as sporting events are an opportunity to take inappropriate photographs or film footage of vulnerable adults. All groups should be vigilant and any concerns should be reported to the management team.

Informed consent forms should be sought for adults at risk, with regard to any material which could be used to identify them individually. Link to Change staff should not photograph clients unless the project has been agreed by the management team.

### **REMEMBER**

‘The welfare of the adult at risk is paramount’. Any adult has the right to report any concerns, or suspicions about another member of staff, volunteer or trustee in confidence and free from harassment. (See our Whistle Blowing Policy.)

If you are not able to follow these procedures due to not being able to contact the management team it is essential that you seek advice from a Line Manager or Social Services immediately. Remember you can check out any issues or concerns, with the Emergency Duty Team at Adult Social Services without giving personal details. E.g. ‘If this situation was to happen what should I do?’

**If you have a concern, think “what if I’m right?” not “what if I’m wrong?”**

**No employee will suffer disciplinary action for acting upon concern for the wellbeing of an adult at risk.**

### **CODE OF BEHAVIOUR**

Staff, volunteers and trustees **MUST NOT**:

- X** Be alone with adults at risk where a risk assessment has not been carried out. (See Lone Working Policy and Procedures).
- X** Transport adults at risk in a private vehicle or mini bus without a risk assessment.
- X** Take adults at risk to the worker’s home under any circumstances.
- X** Make inappropriate contact/form a relationship with adults at risk outside professional boundaries.
- X** Leave adults at risk unattended.
- X** Leave adults at risk in the presence of adults who are not suitably trained.
- X** Leave adults at risk in the presence of adults not known to the member of staff, volunteer or trustee.
- X** Leave adults at risk in the presence of adults who have not had a DBS check.
- X** Show favouritism to any adult at risk engaged with Link to Change such as giving or receiving gifts. Money should never be given, unless with specific permission of the CEO and/or Operations Manager. (See Outreach Policy on buying food and other basic necessities for homeless and neglected young people.)



**X** Let allegations, suspicions, or concerns about abuse go unreported.

Staff, volunteers and trustees **MUST**:

- ✓ Always put this code into practice.
- ✓ Treat everyone with dignity and respect in accordance with the Human Rights Act.
- ✓ Set an example you would wish others to follow.
- ✓ Plan activities that involve more than one other person being present, or at least are within the sight and hearing of others or follow Lone Working Procedures.
- ✓ Follow recommended adult/ adult at risk ratios for meetings and activities.
- ✓ Allow the service user to talk about any concerns they may have.
- ✓ Encourage others to challenge any attitudes or behaviours they do not like.
- ✓ Make everyone aware of the Link to Change Safeguarding Policy and Procedures.
- ✓ Keep others informed of where you are and what you are doing (see Lone Working Policy and Procedures).
- ✓ Remember someone else might misinterpret your actions, no matter how well-intentioned.
- ✓ Take any allegations or concerns of abuse seriously and refer immediately.

**If you have any queries please speak to the management team. Do not wait for supervision or client case review to raise concerns.**

**Link to Change Designated Safeguarding Officers:**

Hayley Brown- Chief Executive

Kelly Panaghiston- Operations Manager

Amy Archer- Services Manager

Fiona Factor- Board of Trustees

## **CONTACTS**

**Bedford Borough Adults-** Bedford Safeguarding Adults Team **01234 276222** or out of hours emergencies only telephone **0300 300 8123**.

Email: [adult.protection@bedford.gov.uk](mailto:adult.protection@bedford.gov.uk)

**Bedford Central Adults-** Contact **0300 300 8122** (Monday to Friday, 8:45am to 5:20pm) or **0300 300 8123** (outside of these hours)

Email: [adult.protection@centralbedfordshire.gov.uk](mailto:adult.protection@centralbedfordshire.gov.uk)

**Luton Adults -** Contact **01582 547730** or for out of hours **01582 547563**.

Email: [adultsafeguarding@luton.gov.uk](mailto:adultsafeguarding@luton.gov.uk)

Reviewed and Updated: April 2024

Approved by Board: April 2024

Approved by Board: June 2020

Reviewed and Updated: December 2019

Approved by Board: February 2020



## **Safeguarding against Positions of Authority**

### **Responding to allegations or suspicions**

It is not the responsibility of anyone working at Link to Change, in a paid or unpaid capacity, to decide whether or not abuse has taken place. However, there is a responsibility to act on any concerns through contact with the appropriate authorities. This will usually be the local authority designated officer (LADO).

Link to Change will assure all staff/volunteers that it will fully support and protect anyone who in good faith reports his/her concerns that a colleague or another professional is, or may be, abusing a child, young person or adult at risk.

#### **LADO**

A LADO is a Local Authority Designated Officer (refer to “Working Together to Safeguard Children 2018”). The LADO works within Children’s Services and implements procedures for managing allegations against those in a position of trust who work with children, including volunteers.

If it is alleged that a person who works/volunteers with children has:

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

This should be reported to the LADO. The LADO rule(s) apply to paid, unpaid, casual, self-employed and volunteer workers. Follow the policy of the local LSCB and inform the CEO immediately.

If you receive a complaint or allegation about any adult or about yourself:

- Contact the CEO, Operations Manager or a Trustee immediately.
- Do not discuss the allegations with other members of the staff or volunteers and trustees, (including the person against whom the allegation has been made).

### **Allegations against a Link to Change employee**

As outlined in “Working Together to Safeguard Children” (2018), any allegation against a member of staff will be reported to the Local Authority Designated Officer (LADO) within one working day of all allegations that come to the employer’s attention or that are made directly to the police. The LADO then provides advice and guidance on the progress of such cases.

All allegations against a Link to Change employee must be reported directly to the CEO and/or Operations Manager. In the instance of the CEO or Operations Manager being in question, or a conflict of interest the allegation must be reported to the appropriate Director from the Board- Rowan Moore.

Where there is a complaint against a paid employee or a volunteer there may be three types of investigation:

- A criminal investigation.
- A child protection investigation.
- A disciplinary or misconduct investigation.

The results of the police and protection investigation may well influence the disciplinary investigation, but not necessarily.



## **DBS Referrals – When do I refer?**

If Link to Change withdraws permission for an individual to engage in regulated or controlled activity, or would have done so had that individual not resigned, retired, been made redundant or been transferred to a position which is not a regulated or controlled activity, because they think that the individual has:

- Engaged in relevant conduct.
- Satisfied the harm test or received a caution or conviction for relevant offence.

If any conditions have been met the information must be referred to the DBS.

You should also refer even if an individual has left your employ before any final disciplinary decision has been made.

## **Internal enquiries and suspension**

The Link to Change CEO and/or Operations Manager or trustee if the individual in question is the CEO, will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further enquiries and investigation.

Irrespective of the findings of the social services or police inquiries, Link to Change's Disciplinary Committee will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the Police. In such cases, Link to Change's Disciplinary Committee must reach a decision based upon the available information, which could suggest that on a balance of probability; it is more likely than not that the allegation is true. The welfare of the child, young person or adult at risk should remain of paramount importance throughout.

## **Allegations of previous abuse**

These may be made some time after the event (e.g., by an adult who was abused as a child or by an employee who is still currently working with children, young people and/or adults at risk).

Where such an allegation is made, Link to Change should follow the procedures as detailed above and report the matter to the Duty Care Team or the police. Other children, young people or adults at risk either within or outside Link to Change, may be at risk from this person.

Anyone who has a previous criminal conviction for offences related to abuse of vulnerable individuals is automatically barred from working with children, young people and adults at risk. This is reinforced by the Safeguarding Vulnerable Groups Act 2006.

## **Referring to DBS**

Referring to DBS is a mandatory duty.

Reviewed and Approved: February 2025

Approved by Board: April 2024



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Approved by Board: September 2022

Reviewed and Updated: December 2019

Approved by Board: January 2020



## **Digital Safeguarding Policy- Link to Change**

### **Introduction**

We have a responsibility to protect and promote the safety and wellbeing of children, young people and vulnerable adults as we help them reach their full potential through our support.

We are committed to the welfare and safeguarding of all our employees and volunteers both offline, and online. And as part of this we believe it's important we can demonstrate best practice in digital safeguarding. This policy sets out the expectations for all employees, volunteers associated contractors, third party providers and users to ensure the protection of children, young people and volunteers and staff online. This policy is to be used in conjunction with the Acceptable IT Usage Policy.

It is our responsibility to raise concerns and report online incidents that happen inappropriately, using this policy and its procedures.

### **Our Commitment to Digital Safeguarding**

Link to Change is committed to safeguarding our children, young people, volunteers and employees – and it is our policy to apply the same rigorous level of safeguarding protection to online as we do in person.

We expect all employees to follow the Acceptable IT Usage Policy online. Employees and anyone who uses a @linktochange.org.uk email address or other email addresses managed by Link to Change must follow the Acceptable IT Usage Policy.

Additional safeguarding measures must be put in place to minimise specific online risk. These can be found in the Digital safeguarding procedures.

### **What does the Policy Cover?**

This policy specifically covers all Link to Change's online and digital activities, plus all digital activities undertaken on behalf of Link to Change at a national, international, and regional level, on proprietary platforms and third-party social media and devices.

This includes but is not limited to email; social media channels; all blogging platforms; volunteer platforms; and other digital platforms such as Google Hangouts and Zoom; all ICT devices (including phones) and internet connectivity that is provided by Link to Change.

This policy explains our approach to protecting beneficiaries, volunteers and employees. We are constrained by the terms of service of third-party social media providers in our approach. We promote safe use, but we also recognise that some issues will only be able to be handled by the service provider and the user themselves.

### **Link to Change's Digital Safeguarding Principles**

To uphold these principles our employees, volunteers and other related parties must:

- Ensure that social media accounts are set up appropriately.
- Make it clear on personal social media accounts using disclaimers that their views, thought and opinions are personal and not reflective of Link to Change policies, procedure or guidance.
- Make sure that technical solutions are in place to reduce access to inappropriate content on devices owned or used by Link to Change. These could be filtering or monitoring software for example parental controls.
- Ensure the correct permissions are in place before taking and using photographs on mobile devices.
- Delete pictures after the event and in accordance with the Link to Change privacy policy.
- Make every effort to ensure that children and young people understand why and how they must use social media responsibly and safely using the appropriate privacy settings.

We recognise that digital safeguarding is an important part of all our work, and we are committed to always delivering best practice.

We will:





- Ensure our projects, activities, programmes and campaigns support all of our children, young people, volunteers and employees to stay safe online.
- Use best practice digital safeguarding for technical solutions, processes and procedures.
- Help others in being effective online.
- Take best practice action when a digital safeguarding incident occurs.
- Support and train appropriate volunteers and employees in digital safeguarding.
- Have appropriate links with key organisations to raise awareness and refer and report incidents.
- Risk-assess all projects, initiatives, programmes, activities, services and campaigns to make sure appropriate digital safeguards are in place.

### **Who is responsible for Digital Safeguarding across Link to Change?**

The Management Team department leads digital safeguarding in Link to Change. All allegations and concerns must be reported to the Management Team in the initial outset.

When an incident happens or an issue is raised, you must deal with it the same way as other safeguarding incidents. Please see the Link to Change Safeguarding Policies for further advice and guidance.

Link to Change is committed to the protection of our beneficiaries, volunteers and employees and will only share information with other agencies where there are significant concerns, or a potential crime has been committed.

### **What do we mean by Digital Safeguarding?**

Digital safeguarding means: 'the protection from harm in the online environment through the implementation of effective technical solutions, advice and support and procedures for managing incidents'. Link to Change is committed to the safeguarding and protection of all beneficiaries, volunteers, employees and users of our digital services and social media channels, and we apply the same safeguarding principles to Link to Change's activities whether they are offline or online.

This means protecting our beneficiaries, volunteers and staff from online harms such as:

- Online bullying and harassment.
- Sexual exploitation and grooming online.
- Discrimination and abuse on the grounds of any protected characteristic.
- Sharing of illegal and inappropriate imagery.
- Cyberstalking.
- Impersonation and hacking.
- Disinformation and misinformation.
- The oversharing of personal information.

*Note this is not an exclusive list.*

### **The Law**

Link to Change adheres to all relevant UK laws relating to users of our digital platforms, third party social media and the use of our ICT equipment.

Relevant laws include:

- Protection from Harassment Act 1997.
- Malicious Communications Act 1988.
- Communications Act 2003.
- Sexual Offences (Amendment) Act 1992.
- Computer Misuse Act 1990.
- The Equality Act 2010.
- Criminal Justice Act 2003 – Criminal Justice (Scotland) Act 2016.



- Sexual Offences Act 2003 – Sexual Offences (Scotland) Act 2016.
- Serious Crime Act 2015.
- Data Protection Act 2018.
- Online Harms White Paper.

*This list is not exhaustive. We review any changes in legislation to make sure we are compliant.*

### **Policy Breaches**

Any breach of this policy or related policies will be managed under the staff disciplinary procedure.

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Approved by Board:

Created: January 2020

Approved by Board: January 2021



## **Safer Recruitment Policy and Procedure**

### **Introduction**

When working with our client group Link to Change is very aware that we engage with a vulnerable section of the community. It is, therefore, imperative that we safeguard those who access our services. In order to do this, we must create an environment of safety and security. The CEO and the Board of Directors are responsible for ensuring that this policy adheres to relevant government guidelines and legislation. Link to Change complies with LSCBs safe recruitment recommendations in all cases.

### **Disclosure and Barring Service Checks**

Link to Change is committed to upholding the highest standards of integrity and security in our vetting processes. The purpose of this policy is to outline the procedures for accessing and utilising databases to screen individuals for suitability in various roles or activities within our organisation. All personnel involved in the vetting process will receive appropriate training to ensure compliance with this policy and relevant laws and regulations. We will handle all information obtained with the utmost confidentiality and will only use it for the intended purpose of vetting individuals. Any decisions made based on vetting information will be fair, transparent, and subject to review and appeal processes. This policy will be regularly reviewed and updated to ensure its effectiveness and alignment with legal and organisational requirements.

Due to the nature of the work we undertake all posts are exempt from the provisions of section 4 (2) of The Rehabilitation of Offenders Act (Exceptions) order 1975. Applicants are therefore not entitled to withhold information about convictions, which for other purposes are 'spent' under the provisions of The Act, and in the event of employment any failure to disclose such convictions could result in dismissal or disciplinary actions by the organisation. False statements made on application or subsequently will be seen as an Act of Gross Misconduct and dealt with in accordance with the current Disciplinary Policy and is likely to result in dismissal.

The Enhanced Disclosure and Barring Service (DBS) process is a thorough background check procedure in the UK used for assessing individuals' suitability for roles involving work with vulnerable groups. It involves applying, verifying identity, conducting comprehensive background checks using police and government databases, assessing risk, issuing a disclosure certificate detailing any relevant information found, and allowing employers to review and make decisions based on the disclosed information. The process aims to safeguard vulnerable groups by helping employers make informed decisions about individuals' suitability for such roles. The DBS check will be requested to provide enhanced disclosure for all employees, partner organisations, volunteers, board members and any other relevant parties, including contractors.

Any concerns that are raised during this process will be directed by both the Chief Executive and the Board of Trustees.

### **Recruitment Procedure**

- Provide a clear Job Description and Personal Specification; detailing what tasks the applicant will do and what skills and experience the person will be expected to have.
- Use CV, supporting statement and/or application form to assess the suitability of a candidate.
- Have a face-to-face interview (or virtual circumstances provided) with pre-planned and clear questions.
- The recruitment panel should always be two or more people.
- Include a question about whether they have any criminal convictions, cautions, other legal restrictions or pending cases that might affect their suitability to work with children.
- Check the candidate's identity, by asking them to provide photographic ID.



- Check the candidate holds the relevant qualifications stated.
- Check for gaps in employment and ask for an explanation.
- Check the candidate has the right to work in the UK. As required by the Asylum and Immigration Act 1999 all candidates invited to interviews will be required to produce evidence of their eligibility to work in the UK i.e. a document containing their N.I. Number, passport or birth certificate, residency certificate and work permit.
- Apply for an enhanced DBS check.
- Take up at least 2 references, to ensure that the applicants information is true, accurate and fair.

Link to Change will consider applications received from ex-offenders. However, although regarding the needs and equal opportunities of the applicant is vital, our primary "duty of care" is to our client base. Therefore, serious consideration should be given to the applicant's criminal activity, pattern and nature of offences and how the applicant appears to have dealt with and/or addressed their offending. If necessary, the situation will be considered at board level.

Link to Change reserve the right to refuse or restrict any employment or opportunity to volunteer based on concerns regarding any of the above.

All employees of Link to Change will be asked to complete a health questionnaire during their recruitment and induction period. This is to ensure that as an equal opportunities employer we can support the wellbeing and health of all staff. This questionnaire will be treated as sensitive data and remain confidential.

### **Providing a Reference**

As an employer, Link to Change, does not have to give a reference by law unless it is clear in writing that one is needed to be provided. Link to Change has the right to restrict a reference through:

- How much information is included in a reference.
- Who can give a reference on the employer's behalf.

If Link to Change provides a reference, it must be accurate and fair. The employee (CEO and/or Operations Manager- only) giving the reference can decide how much they include. Please see reference policy for further details.

### **Equal Opportunities**

*Link to Change is committed to a Policy of Equal Opportunities in Employment, please refer to the Equal Opportunities Employment Policy*

### **Appeal**

Link to Change have in place both a complaint and an appeals procedure and any applicant will be referred to this process in the event of a disputed decision.

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Revised June 2008



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