



## Policy on Protection of Children, Young People and Vulnerable Adults

**Applies from:** August 2022 - July 2025

**Signed of by Directors:** 28<sup>th</sup> August 2022

**Principle:** Spirit Project and Horse Spirit Project CIC (HSP) aims to create an atmosphere where children, young people and vulnerable adults who use our services, or are known to us, feel valued and safe from abuse, bullying and intimidation. We will do this through a careful recruitment, selection process and ongoing supervision of staff members but also by assessing risks and encouraging staff to report any concerns immediately to the Directors.  
Young people are those aged under 18. Vulnerable adults are people over 18 with a substantial learning difficulty or physical disability, physical illness, mental health problem or addiction

**Purpose:** HSP strives to be an organization that promotes safeguarding for all their clients, children of clients or vulnerable adults who are known to our clients.

**Applies to:** Staff, directors, volunteers and clients.

### **Nominated child protection representative:**

Staff, volunteers and directors can obtain guidance on child protection issues from the Designated Safeguarding Lead for Safeguarding in HSP. The Designated Safeguarding Leads are Maya Patrizia Gagni and Shirani Situnayake. They will report any child protection concerns to the relevant Authority. Member groups will be encouraged to contact Adult Services or the Children, young people and vulnerable adults' team if they have specific problems and/or queries. All Designated Named Persons will attend regular training on all safeguarding matters.

### **Policy:**

Whilst our client group consists of mainly over 18 year olds or people who are not vulnerable, it is important to ensure we keep all of our members safe and understand what to do if a group approaches us with a concern or some information.

Many concerns arise on a day-to-day basis and mostly can be dealt with quickly and easily though discussions between staff and the client resolving the issue promptly. These sorts of discussions must still be recorded and kept safely by the Designated Named Person for Safeguarding.

It is the role of Local Authority or the police to investigate any allegations or concerns. Our role is to collect as much information as is possible and pass this onto the relevant authority. It is not our role to verify the accuracy of this information; neither can we withhold this information as a child's safety could be at risk. You should ensure that the Directors are kept informed and records maintained. These records should be kept safe and confidential by the Designated Named Person for Safeguarding.

### **Mission statement**

We believe that:

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

We recognise that:

- the welfare of our clients is paramount in all the work we do and in all the decisions we take
- all clients, 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 clients are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- working in partnership with our clients and other agencies is essential in promoting their welfare.

We will seek to keep our clients, children, young people and vulnerable adults safe by:

- valuing, listening to and respecting them
- appointing a nominated child protection lead for children, young people and vulnerable adults
- adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- developing and implementing an effective online safety policy and related procedures
- providing effective management for staff 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 staff 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 [more information about this is available from the Information Commissioner's Office: [ico.org.uk/for-organisations](http://ico.org.uk/for-organisations)]

- making sure that our clients and their families know where to go for help if they have a concern
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- using our procedures to manage any allegations against staff 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 clients, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff, volunteers and all our clients treat each other with respect and are comfortable about sharing concerns.

### **General Procedures**

If you receive an allegation that a member of staff who works for us, or a volunteer, or member of the public which raises cause for concern towards the wellbeing of any children, young people or vulnerable adults you must contact one of the directors, also the Designated Named Person for Safeguarding, immediately or within 24 hours of the disclosure. The safeguarding person will then assess if a disclosure to the local authority will be needed.

If the concerned person is a member of the staff/volunteers/directors, suspension is not an automatic response to such an allegation, and we will conduct a thorough investigation into the matter using our internal Disciplinary Procedures.

We all have the right and individual responsibility to raise any matters of concern regarding poor practice at work. We are responsible for the welfare and safety of those we care for on behalf of HSP and staff are encouraged to come forward if you have reasonable suspicion of poor or illegal practices. Such staff will be protected, in line with whistleblowing guidelines, if they come forward with this information. Support is available from one of the Directors, also a Designated Named Person for Safeguarding.

### **Recruitment and selection**

HSP has separate Recruitment Policies explaining how we recruit staff and volunteers, what we do about employing people with criminal records and when we obtain Disclosures (police checks).

### **Induction**

All staff and volunteers are provided with an induction which includes this procedure and further training about how this impact upon their work/volunteering in practice. Where disclosures have been obtained prior to commencing with us, the relevant Director will ensure that the induction is thorough and further reading is supplied.

## **Supervision**

All volunteers and employees have regular supervision sessions. These sessions will include time to discuss any concerns or problems staff, volunteers or directors may have about their contact, relationships or ways of working with young people or vulnerable adults, and if appropriate, discuss Disclosure status.

## **Dealing with DBS**

HSP disclosures through local Umbrella bodies for our staff and volunteers. The Designated Named Person for Safeguarding is responsible for dealing with disclosures.

HSP complies fully with the Code of Practice for recipients of disclosure information. The main points of this Code of Practice are:

- Disclosure information will be used fairly
- Information will not be passed to unauthorised people and
- Information will be secure and kept for no longer than is necessary

When deciding what action will be taken as a result of the Disclosure information HSP will consider the following:

- Whether the conviction or other matter revealed is relevant to the post
- The seriousness of any offence or matter revealed
- The length of time since the offence or matter occurred
- Whether there is a pattern of offending behaviour or other relevant matters
- The circumstances and explanation offered by the person involved

Posts which do not involve one-to-one contact or unsupervised contact with young people or vulnerable adults will not require Disclosures.

For posts where staff and volunteers have one-to-one or unsupervised contact, HSP will request an Enhanced DBS check. Some funders may require disclosures as part of the contractual requirements.

If new posts require Disclosures, this will be indicated in the recruitment pack.

Where Disclosures on existing staff reveal an unacceptable record, the disciplinary procedure will be used to provide a fair process to make a decision on the future of the employee and volunteers.

- Confidentiality and duty to disclose information
- See the HSP Confidentiality policy

## Reporting incidents or concerns

*There are some basic principles in reacting to suspicions, allegations, and/or disclosures.*

What to do	What not to do
Stay calm	Don't panic. Don't over-react. It is extremely unlikely that the participant is in immediate danger.
Listen, hear and believe	Don't probe for more information. Questioning the participant may affect how the participant's disclosure is received at a later date.
Give time to the person to say what they want	Don't make assumptions, don't paraphrase and don't offer alternative explanations
Reassure & explain that they have done the right thing in telling. Explain that only those professionals who need to know will be informed	Don't promise confidentiality to keep secrets or that everything will be OK (it might not)  Don't coach the client about what to say
Act immediately in accordance with the procedure in this policy	Don't try to deal with it yourself
Record in writing as near as verbatim as possible what was said as soon as possible	Don't make negative comments about the alleged abuser
Report to the lead member of staff and volunteers	Don't 'gossip' with colleagues about what has been said to you
Record your report and check with your client that it is an accurate account of what they told you.	Don't make a client repeat a story unnecessarily

***It is the duty of anyone working at the service to report disclosed or suspected abuse where the client is unwilling or unable to address these issues herself.***

### Personal Responsibility

- Staff and volunteers made aware of suspicions, allegations or actual abuse are personally responsible for taking the appropriate action according to this procedure.
- The incident should be reported immediately to the supervisor, and/or the Designated Safeguarding Lead, who is then responsible for dealing with allegations or suspicions of abuse.
- Staff and volunteers should never try to deal with a suspicion, allegation or actual incident of abuse by themselves, ***but follow the procedures set out below.***

### Reporting suspected, alleged, or actual incidents of abuse

- It may sometimes be difficult to accept that something that has been disclosed in confidence by a child, a vulnerable adult or anyone else should be passed on to a colleague. However, the welfare of a child/vulnerable adult must be paramount and

all staff and volunteers therefore have a duty to report suspicions, allegations or actual incidents to the Designated Safeguarding Lead: **follow the step-by-step guide outlined in Specific Procedures**

- Information should also be reported if you yourself have concerns that a child/ vulnerable adult may be suffering harm or at risk of abuse, even if you are unsure about your suspicions.

Once this initial report has been made, **the Designated Safeguarding Lead will consult with the relevant statutory agencies:**

See Appendix B for organizational Structure

- Social Services Emergency Duty Team *or*
- Child & Vulnerable Adult Safeguarding Unit *and/or*
- NSPCC Child & Vulnerable Adult Safeguarding Helpline 0808 800 5000

***It is important for the Designated Safeguarding Lead to respond honestly and openly to questions asked by the investigating agency. The following information may be required:***

- a. Staff member's and volunteer's name, address, telephone number, position/role within HSP.
- b. As many details about the child/ vulnerable adult as possible, e.g. name, date of birth, address, home telephone number, school.
- c. What the reasons are for telephoning, e.g. the suspicions, allegations, what has been said, giving details of times and dates and the child's/ vulnerable adult's emotional state, or what the client has reported that the child/vulnerable adult has said in response to the concerns. Make a clear distinction between what is fact, opinion or hearsay.
- d. What has been done so far
- e. Where possible referral to the police or social services should be confirmed in writing within 36 hours and the name of the contact who took the referral should be recorded.

The relevant statutory agency will then give instructions as to what to do next and take the responsibility for further action.

#### **Statutory Child & Vulnerable Adult Safeguarding Procedures**

- What happens next is up to the relevant statutory agency, usually Social Services. However, where HSP feels that not enough action has been taken, and the child or vulnerable adult is still at risk, concerns will be reported again and the appropriate responsible agency contacted for advice.

#### **Recording suspected or actual incidents**

- No matter what happens to a suspicion, allegation or actual incident of abuse (i.e. whether or not it is processed through a statutory agency or not), all details will be recorded.
- Important information to record will include:
  - a. The date and time of disclosure, suspicion, allegation or actual abuse incident;
  - b. Details given to you about the above e.g. date & time of when things occurred;
  - c. An indication of the parties involved;
  - d. Details of what action you and HSP have taken;
  - e. Details of reporting on, e.g. to which statutory agency and when.

If for any reason it is decided not to consult with a relevant statutory agency, a full explanation of why will be documented.  
Recording will be factual, with no reference made to subjective opinions.  
Records will only be shared with those who need to know about the suspicion, allegation or actual incident of abuse.

### **Step-by-step Procedures**

- a) Staff and volunteers made aware of suspicions, allegations or actual abuse are personally responsible for taking the appropriate action.
- b) The incident should be reported immediately to the Designated Safeguarding Lead (DSL), who is then responsible for dealing with allegations or suspicions of abuse.
- c) Remind the client that harm to self and others is outside the limits of our confidentiality boundaries. Let the client know that you will consult with the DSL (within 36 hours) about what to do. Reassure the client that we aim to work with her and support her to enable her to contact Social Services and inform them herself, if this is necessary.
- d) Get clear information about the situation from the client for an initial verbal report to the DSL.
- e) Contact the DSL straight away.
- f) Following an investigation, the DSL will then do one of the following:
  1. If the decision has been taken not to make a referral to social services clients will be monitored throughout their sessions;
  2. If referral is deemed needed, the practitioner and the client will be kept informed and/or involved (providing that this does not place the child/person at further risk).

Appendix A **Definitions of abuse and their signs and symptoms (adults and children)**

Domestic Violence (1)		<p>Any incident or pattern of incidents of controlling, coercive or threatening behavior, 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:</p> <ul style="list-style-type: none"> <li>•psychological</li> <li>•physical</li> <li>•sexual</li> <li>•financial</li> <li>•emotional</li> </ul> <p>Controlling behavior 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 behavior.</p> <p>Coercive behavior 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.”*</p> <p>*This definition includes so called ‘honor’ based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.</p>
Child Abuse (2)		<p>A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.</p>
	Physical abuse	<p>A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.</p>
	Emotional abuse	<p>The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to a child 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 child 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 children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child 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 children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.</p>



	Sexual abuse	Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child 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 children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
	Neglect	The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child'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: <ul style="list-style-type: none"> <li>• provide adequate food, clothing and shelter (including exclusion from home or abandonment);</li> <li>• protect a child from physical and emotional harm or danger;</li> <li>• ensure adequate supervision (including the use of inadequate care-givers); or</li> <li>• ensure access to appropriate medical care or treatment.</li> </ul> <p>It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</p>
Bully (3)		Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling) and emotional (e.g. isolating an individual from the activities and social acceptance of their peer group). The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm). All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti-bullying strategies
Vulnerable Adult (4)		"people with care and support needs"
Inappropriate Behavior (5)		Following the London Child Protection Procedures April 2016 this policy also includes concerns "relating to inappropriate relationships between members of staff and children or young people, for example: <ul style="list-style-type: none"> <li>• Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual (see ss16-19 Sexual Offences Act 2003);</li> <li>• 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 Sexual Offences Act 2003)</li> <li>• Other 'grooming' behavior giving rise to concerns of a broader child protection nature (e.g. inappropriate text / e-mail messages or images, gifts, socializing etc);</li> <li>• Possession of indecent photographs / pseudo-photographs of children"</li> </ul>
How to recognize the signs of abuse (6)		The signs of abuse are not always very clear. The following points might be helpful in identifying possible abuse. <b>Generally:</b> <ul style="list-style-type: none"> <li>• Talks of being left home alone or with strangers.</li> <li>• Poor bond or relationship with a parent, also known as attachment.</li> </ul>

		<ul style="list-style-type: none"> <li>• Acts out excessive violence with other children.</li> <li>• Lacks social skills and has few if any friends.</li> </ul> <p><b>For children under 5:</b></p> <ul style="list-style-type: none"> <li>• Doesn't cry or respond to parent's presence or absence from an early age</li> <li>• Reaches developmental milestones late, such as learning to speak, with no medical reason</li> <li>• Significantly underweight but eats well when given food.</li> </ul> <p><b>5-11 year-olds</b></p> <ul style="list-style-type: none"> <li>• Becomes secretive and reluctant to share information.</li> <li>• Reluctant to go home after school.</li> <li>• Unable to bring friends home or reluctant for professionals to visit the family home.</li> <li>• Poor school attendance and punctuality, or late being picked up.</li> <li>• Parents show little interest in child's performance and behaviour at school.</li> <li>• Parents are dismissive and non-responsive to professional concerns.</li> <li>• Is reluctant to get changed for sports etc.</li> <li>• Wets or soils the bed.</li> </ul>
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(1) Home Office 2013 <https://www.gov.uk/government/publications/new-government-domestic-violence-and-abuse-definition>

(2) [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419595/Working\\_Together\\_to\\_Safeguard\\_Children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf)

(3) <http://www.ncl.ac.uk/studentambassadors/assets/documents/NSPCCDefinitionsandsignsofchildabuse.pdf>

(4) Care Act 2014 [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/198104/9520-2900986-TSO-Factsheet07-ACCESSIBLE.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/198104/9520-2900986-TSO-Factsheet07-ACCESSIBLE.pdf)

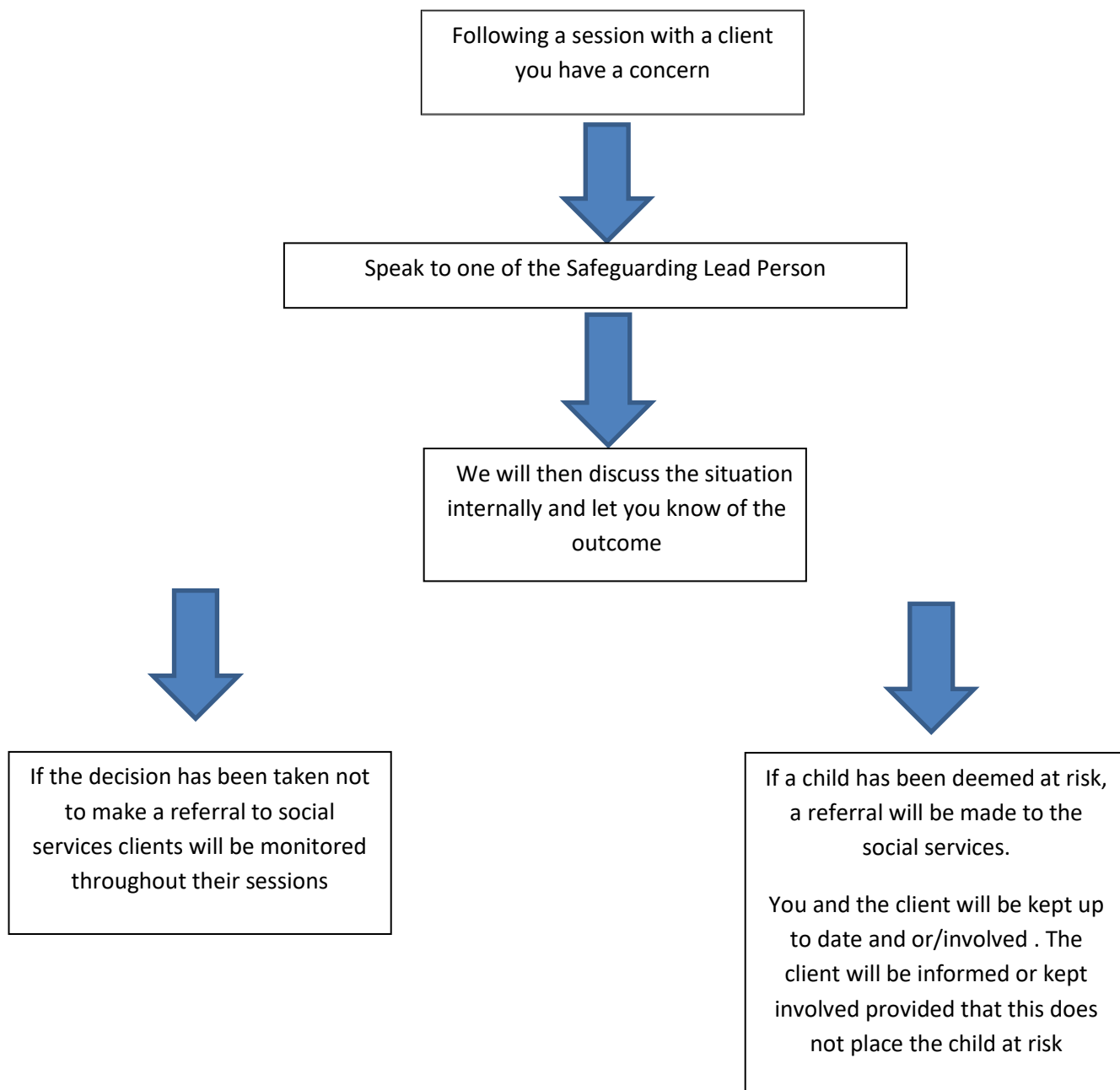
(5) London Child Protection Procedures 2016 <http://www.londoncouncils.gov.uk/download/file/fid/18178>

(6) <https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>

# Reporting Flow Chart

Safeguarding Lead Person:

Maya Gagni [maya.g@hotmail.co.uk](mailto:maya.g@hotmail.co.uk) 07903 598 324 - Shirani Situnayake [shirani.s@hotmail.co.uk](mailto:shirani.s@hotmail.co.uk) 07950 856 263






## Useful Links:

- Local Safeguarding Board and Local Authority Designated Officer (LADO)  
<http://www.safecic.co.uk/your-scb-acpc/55-free-downloads-and-safeguarding-links/61-safeguarding-children-board-links>

## Safeguarding Training Log

Maya Patrizia Gagni

Training Title	Date Completed
SAFEGUARDING CHILDREN LEVEL 3	 Maya-Patrizia-Gagni- Safeguarding-Childre 24.11.22
Safeguarding Adults Level 3	 Safeguarding Adults Level 3 Decen 22.12.22
Designated Safeguarding Lead	 Designated Safeguard Lead Cert 22.12.22

Shirani Situnayake

Training Title	Date Completed