Hounslow Action for Youth

# CHILDREN & ADULTS AT RISK

# SAFEGUARDING POLICY AND PROCEDURE

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## 1. INTRODUCTION & PURPOSE

Hounslow Action for Youth (HAY) is committed to safeguarding and promoting the welfare of all children, young people and adults at risk who take part in our activities or come into contact with our services. Safeguarding is central to our values, our culture, and the way we work. Every member of staff, volunteer and trustee has a responsibility to create an environment where people feel safe, respected and supported.

**This Safeguarding Policy and Procedure sets out:**

- how HAY protects children, young people and adults at risk from harm, abuse, exploitation and neglect
- the roles and responsibilities of staff, volunteers and trustees
- what to do if you have a concern or disclosure
- how allegations about staff or volunteers are managed
- how HAY ensures safer recruitment, safer working practice and strong safeguarding governance

**This policy applies to:**

- all HAY employees, volunteers, trustees, and sessional workers
- anyone working on behalf of HAY, including contractors, placement students and partner organisations
- all activities delivered by or in partnership with HAY

**HAY's safeguarding work is guided by the following legislation and statutory guidance:**

- **Working Together to Safeguard Children (2023, updated 2024)**
- **Children Act 1989 and 2004**
- **Care Act 2014** (adult safeguarding)
- **Domestic Abuse Act 2021**
- **Serious Crime Act 2015** (FGM mandatory reporting)
- **Counter-Terrorism and Security Act 2015 / Prevent Duty**
- **Online Safety Act 2023**
- **Data Protection Act 2018 & UK GDPR**
- **Disclosure and Barring Service (DBS) guidance**

HAY follows the procedures of the London Borough of Hounslow Safeguarding Children Partnership and Hounslow Safeguarding Adults Board, including local thresholds guidance, referral pathways and escalation processes.

Safeguarding is everyone's responsibility. By working together—staff, volunteers, families, communities and partners—we ensure that children, young people and adults at risk are protected, supported and empowered to thrive.

## 2. SCOPE

This Safeguarding Policy and Procedure applies to everyone who works for, represents, or acts on behalf of Hounslow Action for Youth (HAY). It sets out the expectations, responsibilities and procedures that must be followed whenever there are concerns about the safety or welfare of a child, young person or adult at risk.

## 2.1 Who does the policy apply to:

**HAY staff and representatives**
- All employees, regardless of role or seniority
- Volunteers, mentors, sessional workers and placement students
- Trustees and members of the Board

**Contractors and individuals engaged on behalf of HAY**
- Anyone delivering activities under HAY's name or on HAY premises

**Partner organisations**
Where HAY works in partnership, sub-contracts or co-delivers services, all partners are expected to:
- follow their own safeguarding policies that meet or exceed HAY's standards, and
- ensure their staff follow the safeguarding procedures outlined in this document when working with HAY participants.

HAY will not work with any organisations that cannot demonstrate safe and appropriate safeguarding practices.

## 2.2 Who we safeguard
This policy covers the safeguarding and protection of:

**Children**
Anyone under the age of 18, including unborn babies.

**Young people**
Young people aged 16–25 who may require additional support during adolescence, transition to adulthood, and early independence.

**Adults at risk**
Adults aged 18 or over who:
- have care and support needs,
- are experiencing or at risk of abuse or neglect, and
- are unable to protect themselves because of those needs. (Definition from the Care Act 2014.)

## 2.3 Where do Safeguarding responsibilities apply:
- all HAY programmes and activities
- one-to-one work
- group sessions
- outreach and community work
- digital and online environments
- trips and off-site activities

## 2.4 When this policy applies
This policy must be followed **at all times**, including:
- during paid or voluntary work
- before, during and after organised activities
- in online communication
- in any situation where a staff member or volunteer becomes aware of a safeguarding concern, even outside working hours or offsite

No one at HAY is exempt from safeguarding responsibilities.

## 3. LEGAL & POLICY FRAMEWORK

HAY's safeguarding work is underpinned by UK legislation and statutory guidance that sets out how organisations must protect children, young people and adults at risk from harm. This policy has been developed in accordance with the following legal and regulatory frameworks:

### 3.1 Core Safeguarding Legislation

**Children Act 1989 & Children Act 2004**
These Acts establish the duty to safeguard and promote the welfare of children and set out expectations for organisations working with them.

**Care Act 2014**
Provides the statutory framework for safeguarding adults at risk, including definitions, responsibilities and the requirement for multi-agency safeguarding arrangements.

**Domestic Abuse Act 2021**
Defines domestic abuse in law and requires organisations to recognise the impact of coercive control, economic abuse and harmful family dynamics on both children and adults.

**Serious Crime Act 2015**
Includes mandatory reporting duties relating to Female Genital Mutilation (FGM) and reinforces protections for children.

### 3.2 Statutory Guidance

**Working Together to Safeguard Children (2023, updated 2024)**
The key statutory guidance outlining how agencies must work together to safeguard children. HAY adheres to all relevant duties, including:

- sharing information appropriately
- early help responsibilities
- multi-agency response expectations

**Prevent Duty Guidance (revised 2023)**
Sets out organisations' responsibilities to protect children and adults from radicalisation or extremism.

**Keeping Children Safe in Education (2024)**
Although HAY is not an educational institution, we incorporate relevant safer recruitment and low-level concerns principles as sector best practice.

**London Child Protection Procedures (latest edition)**
HAY follows the procedures for:

- referral thresholds
- multi-agency working
- escalation and resolution processes as set by the London Borough of Hounslow Safeguarding Children Partnership.

### 3.3 Data Protection & Information Law

**Data Protection Act 2018 & UK GDPR**
These regulations define how personal and sensitive information must be handled, stored and shared.
HAY ensures:

- information is shared on a "need-to-know" basis
- safeguarding concerns can override consent when necessary
- accurate and secure records are maintained

**Information Sharing: Advice for Practitioners (2024 update)**
HAY follows the seven principles of lawful and proportionate information sharing.

### 3.4 Disclosure & Barring Service (DBS) Requirements

HAY complies with the legal duties under:

- the Safeguarding Vulnerable Groups Act 2006
- the Protection of Freedoms Act 2012
- DBS filtering rules

All eligible staff and volunteers undergo an enhanced DBS check, as described in Section 7.

### 3.5 Local Safeguarding Partnerships

HAY works in accordance with safeguarding arrangements set by:

- **Hounslow Safeguarding Children Partnership**
- **Hounslow Safeguarding Adults Board**

This includes following:

- local referral pathways
- multi-agency thresholds
- LADO procedures
- escalation/resolution policies

### 3.6 Charity Commission Requirements

As a registered charity, HAY must meet the Charity Commission's expectations regarding:

- safeguarding oversight and governance
- reporting serious incidents
- ensuring safe recruitment and safe practice

Trustees hold ultimate accountability for safeguarding within HAY.

## 4. DEFINITIONS

Safeguarding uses specific terminology, and it is essential that everyone working with HAY understands these terms clearly. The definitions below reflect current UK legislation and statutory guidance.

### 4.1 Child

Anyone under the age of 18, regardless of their circumstances, legal status or living arrangements. (Children Act 1989)

### 4.2 Young Person

A person aged **16–25** who may require additional support during adolescence, transition to adulthood, further education, or early independence.
HAY recognises that safeguarding needs may remain high across this age group.

### 4.3 Adult at Risk

Defined under the **Care Act 2014** as an adult aged 18 or over who:

- has care and support needs (whether or not the local authority meets them)
- is experiencing, or is at risk of, abuse or neglect
- as a result of those needs, is unable to protect themselves from the risk or experience of abuse or neglect

Adults aged **18–25** may be considered adults at risk during transitional stages or due to developmental, social or contextual vulnerabilities.

### 4.4 Abuse

Abuse is a violation of an individual's human or civil rights and may consist of a single act or repeated acts. Abuse may be:

- **physical**
- **emotional/psychological**
- **sexual**
- **financial**
- **neglect or acts of omission**
- **discriminatory**
- **organisational or institutional**
- **domestic abuse**
- **online abuse**
- **child sexual or criminal exploitation (CSE/CCE)**

Detailed definitions and signs of abuse are provided in **Appendix A**.

### 4.5 Neglect

Neglect is the persistent failure to meet basic physical or emotional needs, likely to result in the serious impairment of health or development.

Neglect may include lack of supervision, unsafe environments, or failure to provide appropriate medical care.

### 4.6 Safeguarding

Safeguarding means:

- protecting children, young people and adults at risk from abuse, harm or neglect
- ensuring safe and effective care
- promoting welfare and wellbeing
- taking action to prevent harm
- enabling people to have the best outcomes

Safeguarding applies to all staff, volunteers, and trustees.

### 4.7 Child Protection

Child protection is part of safeguarding and refers specifically to the actions taken when a child is suffering, or is likely to suffer significant harm. (Children Act 1989, Section 47)

### 4.8 Adult Safeguarding

Adult safeguarding refers to the actions taken to protect an adult's right to live in safety, free from abuse and neglect.

It is guided by the **six principles of the Care Act 2014**:

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

### 4.9 Designated Safeguarding Officer (DSO)
The named person(s) within HAY responsible for:
- receiving safeguarding concerns
- making decisions about referrals
- contacting Children's Services, Adult Social Care or Police
- liaising with the LADO for staff allegations
- maintaining safeguarding records
- supporting staff with concerns

DSO details are listed in **Appendix C** of this policy.

### 4.10 Local Authority Designated Officer (LADO)
A statutory role responsible for managing allegations about adults who work or volunteer with children.
HAY must contact the LADO **within 1 working day** of any allegation meeting the threshold.
Hounslow LADO contact details are listed in **Appendix C**.

### 4.11 Regulated Activity
Work that involves specific forms of close, regular or unsupervised contact with children or adults at risk.
Staff and volunteers engaged in regulated activity require an enhanced DBS check with barred list check.

### 4.12 Early Help
Support offered at the earliest opportunity to prevent concerns from escalating. HAY will work with families, partners and the community to identify needs early.

### 4.13 Harm
Ill-treatment or impairment of health or development, including impairment suffered from witnessing domestic abuse.

## 5. SAFEGUARDING PRINCIPLES

HAY is committed to creating a safe, nurturing and empowering environment for all children, young people and adults at risk who engage with our services. Our safeguarding work is guided by the following principles, which reflect national legislation, statutory guidance and good practice.

### 5.1 The Best Interests of the Child
The welfare of the child is **paramount** (Children Act 1989). All decisions and actions taken by HAY must place the safety, needs and rights of the child or young person at the centre.

### 5.2 Protection and Prevention
HAY takes a proactive approach to safeguarding by:
- identifying concerns early
- reducing risks wherever possible
- creating safe physical and emotional environments
- ensuring staff understand and follow safe working practices

Safeguarding is not only about responding to harm — it is about preventing harm from happening in the first place.

### 5.3 Empowerment

Children, young people and adults at risk should be supported to:

- be listened to
- express their views
- understand their rights
- make informed choices

Our approach is child-centred, strengths-based and respectful of individual autonomy, while recognising that some people may be unable to protect themselves without support.

### 5.4 Partnership Working

Safeguarding is a shared responsibility. HAY works collaboratively with:

- families and carers (where appropriate)
- schools, health and social care professionals
- the Police and Hounslow MASH
- community and voluntary organisations

Effective safeguarding relies on **timely information sharing** and **clear communication** across agencies.

### 5.5 Accountability

All staff, volunteers and trustees share responsibility for safeguarding and must:

- follow this policy and procedure
- act immediately on concerns
- maintain appropriate boundaries
- record concerns clearly and factually
- work transparently and professionally

Trustees hold ultimate oversight and ensure safeguarding systems remain effective.

### 5.6 Proportionality

Responses to safeguarding concerns must always be:

- proportionate
- fair
- necessary
- least intrusive but still effective

This principle ensures HAY responds appropriately to concerns without overstepping.

### 5.7 Respect and Non-Discrimination

Safeguarding practice must be inclusive and free from discrimination based on:

- race or ethnicity
- disability
- sex or gender identity
- faith or belief
- sexual orientation
- immigration status
- socio-economic background
- neurodivergence
- or any other protected characteristic

HAY affirms every individual's right to safety, dignity and respect.

### 5.8 Safe Workforce

Safeguarding is enabled by:

- safer recruitment
- safe induction and ongoing training

- supervision and support
- a positive safeguarding culture
- clear expectations of conduct

Everyone who works with HAY must feel confident and competent in fulfilling their safeguarding responsibilities.

### 5.9 Making Safeguarding Personal (Adults at Risk)

When working with adults at risk, HAY applies the **six principles of the Care Act 2014**:

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

We aim to involve adults in decisions about their safety wherever possible.

## 6. ROLES & RESPONSIBILITIES

Safeguarding is everyone's responsibility. All staff, volunteers and trustees must understand their role in keeping children, young people and adults at risk safe. This section outlines the duties of each part of the organisation.

### 6.1 Trustees (Board of HAY)

Trustees hold **ultimate accountability** for safeguarding within the organisation.
They must ensure that:

- HAY meets all legal and regulatory safeguarding requirements
- safeguarding policies and procedures are in place, implemented and reviewed
- there is a Named Safeguarding Lead on the Board
- a safe and positive safeguarding culture is promoted at all levels
- the organisation manages risk appropriately
- serious incidents are reported to the Charity Commission where required
- safer recruitment and DBS processes are robust
- safeguarding training and supervision are available for staff and volunteers
- allegations against staff or volunteers are managed properly

Trustees do **not** make day-to-day safeguarding decisions but must maintain oversight and challenge.

### 6.2 Chief Executive Officer (CEO)

The CEO is responsible for:

- ensuring safeguarding policies and procedures are implemented across all services
- ensuring staff understand and follow the Reporting Concerns process
- ensuring safeguarding is embedded in organisational planning and governance
- supporting the Designated Safeguarding Officer (DSO)
- managing concerns about the DSO
- escalating concerns to the Chair of Trustees where appropriate
- ensuring adequate resources for safeguarding (e.g., training, DBS checks, supervision)

The CEO may deputise for the DSO if necessary.

### 6.3 Designated Safeguarding Officer (DSO)

The DSO is the central point for all safeguarding concerns. Their responsibilities include:

**Receiving & managing concerns**
- Responding to all safeguarding concerns raised by staff, volunteers or external partners
- Reviewing information and assessing level of risk
- Making decisions about whether to refer to:
  - Hounslow MASH
  - Hounslow Adult Social Care
  - the Police
  - the Local Authority Designated Officer (LADO)
- Seeking advice when thresholds are unclear

**Referrals & multi-agency working**
- Making referrals within the same working day
- Contacting the LADO within 1 working day for allegations about staff
- Liaising with Children's Services, Adult Services, Police or other agencies
- Sharing information lawfully and appropriately
- Ensuring actions from other agencies are recorded and followed up

**Records & documentation**
- Maintaining secure, clear safeguarding records
- Ensuring decisions and rationales are documented
- Updating the safeguarding log and monitoring patterns or repeat concerns

**Training & guidance**
- Ensuring staff receive safeguarding induction and refreshers
- Providing advice, supervision and support to staff on safeguarding matters
- Keeping up to date with changes in safeguarding legislation and local procedures

**Availability**
- Being available for staff to consult during working hours
- Ensuring a deputy DSO is identified when absent

The names and contact details of HAY's DSO(s) appear later in this policy.

### 6.4 Deputy Designated Safeguarding Officer(s)
Deputy DSOs support the DSO and act in their absence. They must:
- follow the same procedures and responsibilities as the DSO
- consult with the DSO or CEO when needed
- ensure concerns are not delayed due to unavailability

### 6.5 Managers & Supervisors
Managers must:
- ensure their teams understand safeguarding responsibilities
- model safe and appropriate practice
- ensure concerns are raised immediately
- monitor staff wellbeing and the emotional impact of safeguarding work
- provide reflective supervision when safeguarding issues arise

### 6.6 All Staff, Volunteers, Mentors & Contractors
Everyone working with HAY has a duty to:
- read and follow the Safeguarding Policy & Procedure
- complete mandatory safeguarding training

- report any safeguarding concern immediately and within the same working day
- record factually and accurately
- maintain professional boundaries
- follow the Staff and Volunteer Code of Conduct
- challenge unsafe practice
- never promise confidentiality
- maintain appropriate behaviour online and offline

No staff member or volunteer should investigate concerns themselves — **all concerns must be escalated to the DSO.**

### 6.7 External Partners & Organisations

Where HAY works in partnership (delivery partners, subcontractors, shared spaces):

- partners must have their own safeguarding policy that meets or exceeds HAY's standards
- partners must follow HAY's reporting route when delivering under HAY
- safeguarding responsibilities must be clarified in agreements or MOUs

HAY will not work with organisations that cannot demonstrate safe practice.

## 7. SAFER RECRUITMENT

HAY is committed to ensuring that all staff, volunteers and trustees who work with children, young people and adults at risk are suitable, safe, and appropriately vetted. Safer recruitment is an essential part of HAY's safeguarding culture and applies to all roles within the organisation, whether paid or unpaid.

Safer recruitment reduces the risk of individuals who may pose a risk of harm being employed or volunteering within our services.

### 7.1 Principles of Safer Recruitment

HAY follows safer recruitment principles drawn from:

- **Working Together to Safeguard Children (2023)**
- **Keeping Children Safe in Education (2024) – applicable principles**
- **Charity Commission safeguarding expectations**
- **Disclosure and Barring Service (DBS) regulations**
- **London Child Protection Procedures**

Our approach is based on:

- **Transparency** – clear expectations for applicants
- **Consistency** – all roles go through the same safe processes
- **Fairness** – recruitment decisions are objective and evidence-based
- **Prevention** – deterring and identifying unsuitable individuals
- **Review** – ongoing monitoring of staff and volunteers

### 7.2 Recruitment and Vetting Process

All applicants for roles involving contact with children, young people or adults at risk must complete:

**1. Application and screening**

- Standardised application form
- Assessment of previous experience and safeguarding suitability
- Identification check

**2. Interview**

Interviews must include safeguarding-related questions exploring:

- attitudes towards safeguarding
- understanding of professional boundaries
- responses to hypothetical safeguarding situations
- awareness of safer practice

**3. References**
Two references are required, including:
- the most recent employer / verification of character, conduct, and suitability
- direct questions about safeguarding concerns or allegations

References must be checked before appointment wherever possible.
**4. DBS Checks**
Roles involving regulated activity or regular contact require an:
- **Enhanced DBS check**, and
- **Barred List check**, where applicable

DBS checks must be completed **before** an individual starts regulated activity.

### 7.3 DBS Log and Monitoring
HAY maintains a secure DBS Register recording:
- name and role
- DBS certificate number or internal reference
- level of check
- date of issue
- renewal or re-check date
- status

DBS checks are renewed every **three years** for all eligible staff, volunteers and trustees.
When DBS logs are shared externally (e.g., for audits), personal identifiers are redacted in line with UK GDPR.

### 7.4 Induction and Training
All new staff, volunteers and trustees receive:
- safeguarding induction training
- a copy of this Safeguarding Policy and Procedure
- clear expectations of safe practice and professional boundaries
- information on how to report concerns and access support

They must confirm in writing that they have read and understood the policy.

### 7.5 Ongoing Suitability
Safer recruitment continues beyond the appointment stage.
HAY ensures:

- regular supervision and reflective practice
- annual safeguarding updates
- monitoring of staff behaviour and conduct
- prompt escalation of any concerns about suitability
- timely LADO referrals where thresholds are met

Anyone who does not meet safeguarding expectations may be removed from their role.

### 7.6 Contractors and Partner Organisations
Where external individuals or organisations deliver work on behalf of HAY:
- they must demonstrate safe recruitment and vetting procedures
- they must provide evidence of DBS checks where relevant
- HAY retains the right to require additional checks or refuse access

- safeguarding responsibilities must be agreed in contracts or partnership agreements

### 7.7 Link to Standalone Safer Recruitment Policy

This section is a summary. Full details of the safer recruitment process can be found in HAY's **Safer Recruitment Policy**, which should be read alongside this document.

## 8. DISCLOSURE AND BARRING SERVICE (DBS) CHECKS & DBS REGISTER

HAY is committed to ensuring that all staff, volunteers and trustees who work with children, young people or adults at risk are appropriately vetted. The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevents unsuitable individuals from working in regulated activity. This section outlines HAY's responsibilities for carrying out DBS checks and maintaining an up-to-date DBS Register.

### 8.1 Who Requires a DBS Check

A DBS check is required for:

- anyone working in regulated activity with children or adults at risk
- anyone providing one-to-one support, mentoring or supervision
- staff or volunteers whose work gives them regular or opportunity-based contact with children or adults at risk
- trustees who have oversight of regulated activity
- contractors or sessional workers who may have unsupervised access to children or adults at risk

The level of check required is determined during the recruitment process.

### 8.2 Types of DBS Checks Used by HAY

**Enhanced DBS Check (Children's Workforce)**
For staff and volunteers engaged in regulated activity with children or young people.

**Enhanced DBS with Barred List Check**
Required where the role includes:

- unsupervised, close or personal care
- teaching, training, instruction or supervision
- one-to-one mentoring or befriending
- overnight or residential activities

**Enhanced DBS (Adults at Risk Workforce)**
Used where staff have specific responsibilities supporting adults at risk under the Care Act 2014.

### 8.3 Timing of Checks

- DBS checks must be completed before an individual begins regulated activity.
- Evidence of a DBS check must be seen and verified by HAY.
- Individuals may not start unsupervised work until clearance is complete.

### 8.4 Renewal of DBS Checks

HAY renews DBS checks for eligible staff, volunteers and trustees **every three years** or sooner if:

- concerns arise about an individual's suitability
- there is a change in role or responsibility
- the DSO determines that an earlier check is required

HAY encourages staff to register for the **DBS Update Service** where appropriate.

### 8.5 DBS Register (DBS Log)

HAY maintains a secure DBS Register which records the following information for each staff member, volunteer or trustee:

- Name
- Role
- Level of DBS check
- Certificate number (or internal reference number)
- Issue date
- Renewal or re-check date
- Status (clear/pending)

**The DBS Register is:**

- maintained by the DSO or delegated safeguarding lead
- reviewed regularly to ensure no expired checks remain
- stored securely in compliance with UK GDPR and the Data Protection Act 2018

When DBS information is shared externally (e.g., audits or funders), all personal identifiers **not required for assurance** are redacted.

### 8.6 Unsuitable Persons and Duty to Refer

HAY has a legal responsibility to make a **DBS referral** if an individual:

- has been dismissed or removed from regulated activity due to safeguarding concerns,
- has resigned before a disciplinary process concluded, or
- poses a risk of harm to children or adults at risk.

This duty applies even if no criminal offence is proven.
The referral is made by the **CEO**, with oversight from the **Trustee safeguarding lead**.

### 8.7 Refusal, Withdrawal or Suspension of Roles

HAY reserves the right to:

- refuse appointments
- withdraw offers
- suspend individuals
- refuse access to activities

if DBS information or safeguarding concerns indicate any risk to service users.

## 9. STAFF & VOLUNTEER CODE OF CONDUCT (SUMMARY)

Everyone who works with HAY—staff, volunteers, mentors, sessional workers, trustees and contractors—has a responsibility to maintain safe, professional and appropriate behaviour at all times. The way adults behave around children, young people and adults at risk significantly affects trust, wellbeing and safety.

This section outlines the core expectations. The full Code of Conduct must be read alongside this safeguarding policy.

### 9.1 Core Behaviour Expectations

All staff and volunteers must:

- Treat all children, young people and adults at risk with dignity, respect and fairness.
- Maintain clear, safe and professional boundaries at all times.
- Follow HAY's safeguarding procedures, including reporting concerns immediately.
- Behave in a way that is open, transparent and accountable.
- Use clear, age-appropriate and respectful language.

- Avoid situations where they are alone with a child or young person unless this is agreed, risk assessed and appropriate.
- Record any concerns factually and submit them to the DSO the same day.
- Challenge and report unsafe practice by colleagues or partner staff.
- Follow guidance on digital communication, social media and online safety.
- Seek support and supervision when safeguarding issues arise.

### 9.2 Prohibited Behaviours

Staff and volunteers must *never*:

- Engage in sexual behaviour or inappropriate contact with a child, young person or adult at risk.
- Engage in flirting, suggestive comments or sexualised communication.
- Develop or encourage personal relationships with service users.
- Accept or give inappropriate gifts.
- Use their position to intimidate, threaten, bully or favour a young person.
- Promise confidentiality or keep secrets requested by service users.
- Communicate with service users through personal phones, accounts or social media.
- Meet children or young people outside of approved activities.
- Use physical punishment or any form of degrading treatment.
- Consume alcohol or drugs when responsible for children or young people.

These behaviours may lead to disciplinary action, dismissal, referral to the LADO and/or DBS, and in some cases, police involvement.

### 9.3 Professional Boundaries

Boundaries exist to protect both service users and staff. Staff and volunteers are expected to:

- Understand the power imbalance inherent in helping roles.
- Avoid situations that could be misinterpreted.
- Disclose any potential conflicts of interest (e.g., family relationships).
- Never share personal problems or information that blurs the professional role.
- Avoid physical contact unless it is necessary, proportionate and appropriate.

When in doubt, staff must seek guidance from a manager or the DSO.

### 9.4 Link to Full Code of Conduct

This section provides a summary only.
All HAY staff, volunteers and trustees must read, understand and sign the **HAY Staff & Volunteer Code of Conduct Policy**, which sets out detailed expectations for conduct, communication, boundaries, digital behaviour and professional practice.

Compliance with the Code of Conduct is a condition of working or volunteering with HAY.

## 10. PARTNERSHIP WORKING

Safeguarding is most effective when organisations work together. HAY collaborates with a wide range of partners to deliver programmes, support young people and strengthen community wellbeing. We expect all partners to share our commitment to safeguarding and to uphold strong, transparent safeguarding practices.

This section outlines the standards HAY requires when working with external organisations or professionals.

### 10.1 Shared Responsibility

All partners, contractors, and organisations working with or on behalf of HAY must:

- prioritize the safety and welfare of children, young people and adults at risk
- comply with relevant UK legislation, statutory guidance and local safeguarding procedures
- follow HAY's safeguarding procedures when working directly with HAY service users
- share concerns with HAY in a timely and appropriate manner
- create safe environments within their own services

Safeguarding responsibilities must be understood and upheld by everyone involved.

### 10.2 Expectations of Partner Organisations

Before entering into a partnership, HAY must be satisfied that the partner organisation:

- has an up-to-date safeguarding policy that meets or exceeds HAY's standards
- has safer recruitment practices, including DBS checks for staff working with service users
- provides safeguarding training for its staff
- has clear reporting structures for concerns
- understands its responsibilities for information sharing and cooperation

HAY reserves the right to decline partnerships where safeguarding standards are insufficient.

### 10.3 Roles and Responsibilities in Joint Work

When activities are delivered jointly:

- each organisation remains responsible for the conduct of its own staff
- safeguarding arrangements must be clarified in writing (e.g., service agreements, contracts, MOUs)
- decision-making responsibility for referrals must be defined and agreed
- the Designated Safeguarding Leads from each organisation must be named and contactable

HAY will coordinate with partners to ensure consistent, safe practice.

### 10.4 Information Sharing

Effective safeguarding relies on timely and lawful information-sharing. Partners must:

- share concerns about a child, young person or adult at risk without delay
- provide factual and relevant information
- follow UK GDPR and the Data Protection Act 2018
- understand that consent is not required if a child or adult at risk is in danger or at risk of harm

If a partner raises a concern, HAY will take responsibility for making referrals to statutory agencies unless otherwise agreed.

### 10.5 Concerns About Partner Staff

If a safeguarding concern involves someone from a partner organisation:

- the concern must be reported to HAY's DSO immediately
- the partner organisation will be informed and expected to cooperate fully
- if the concern involves someone working with children, a referral to the Local Authority Designated Officer (LADO) will be made
- HAY may suspend joint activities until concerns are resolved
- safety of service users will always be the priority

### 10.6 Escalation and Disagreement Resolution

If there are differences of opinion between HAY and a partner organisation about safeguarding thresholds or actions:

- concerns must be escalated to both organisations' Designated Safeguarding Leads
- if disagreement continues, it must be escalated to senior management
- HAY will follow the Hounslow multi-agency escalation policy to resolve professional disagreements

### 10.7 Ending Partnerships

HAY may suspend or terminate a partnership if:
- safeguarding concerns are not addressed
- the partner organisation fails to follow safe practice
- there is lack of cooperation around safeguarding issues

Child, young person and adult safety takes precedence over partnership arrangements.

## 11. REPORTING SAFEGUARDING CONCERNS (STEP-BY-STEP)

Safeguarding concerns must always be taken seriously and acted upon immediately.
All staff, volunteers, mentors and trustees must follow the steps below if they are worried about the safety, welfare or behaviour of a child, young person or adult at risk.

**Do not investigate concerns yourself — your responsibility is to report, not to decide.**

### **Step 1** — Is the person in immediate danger?

If a child, young person or adult at risk is in **immediate danger**, or a crime is in progress:
**Call 999 immediately** (Police, ambulance or both, depending on the situation)
Examples of immediate danger include:
- serious physical injury
- threat of violence or weapons
- a child stating they cannot go home due to immediate risk
- a child or adult going missing in suspicious circumstances
- sexual assault or risk of imminent harm

After calling 999, you must contact the **Designated Safeguarding Officer (DSO)** as soon as it is safe to do so.
If there is **no immediate danger**, continue to Step 2.

### 11.2 **Step 2** — Record the concern (factual, same day)

Record:
- what you saw, heard or were told
- date, time, location
- names of those involved
- exact words used if it was a disclosure
- your observations (not your interpretation)

Submit the written record to the DSO **within the same working day**.
Do **not** promise confidentiality.
Do **not** ask leading questions.
Do **not** contact parents/carers unless instructed by the DSO.

### **Step 3** — Report to the Designated Safeguarding Officer

Contact the DSO **immediately** and no later than the end of your shift or working day.

If the DSO is unavailable ➞ contact the **Deputy DSO**
If the Deputy is unavailable ➞ contact the **CEO**
If the concern is about the CEO ➞ contact the **Chair of Trustees**

All concern must be reported **within the same day.**

### **Step 4** — What the DSO does

The DSO will:
- review the concern
- assess the level of risk
- decide whether the threshold for referral is met
- consult with safeguarding partners where necessary

make a referral to:
- **Hounslow MASH** (children)
- **Hounslow Adult Social Care** (adults at risk)
- **Police** (crime or immediate risk)
- **LADO** (if the concern is about staff/volunteer behaviour)

Referrals should be made **within the same working day**, and **LADO referrals within 1 working day**.
The DSO will record all decisions and actions taken.

### 11.5 **Step 5** — Follow-up and ongoing actions

The DSO will:
- keep staff updated as appropriate
- share necessary information with agencies
- monitor the situation and follow up on outcomes
- store all records securely
- complete the safeguarding log

Staff may be asked to provide additional information to support multi-agency enquiries.

### 11.6 Professional Curiosity and Escalation

If staff feel that:
- their concern has not been addressed,
- the situation is escalating, or
- a child or adult remains at risk,

they must **raise the concern again** with the DSO or CEO.
If concerns remain unresolved, staff should follow the **Hounslow multi-agency escalation policy**.
No one should ever hesitate to challenge decisions if they believe someone is at risk.

### 11.7 Whistleblowing

If you suspect:
- unsafe practice
- a failure to follow procedures
- a safeguarding concern being ignored
- concerning behaviour within HAY or partner staff

and if you feel unable to raise this through normal channels, you may contact:
- the CEO
- the Chair of Trustees
- the NSPCC Whistleblowing Helpline
- the Charity Commission (for serious incidents)

You will be supported, and your concerns will be taken seriously.

### 11.8 Confidentiality and Information Sharing

Safeguarding always takes precedence over confidentiality. Information may be shared **without consent** if:

- someone is in danger
- a crime may have been committed
- a child or adult at risk is being harmed
- refusal of consent increases risk

Staff must explain to children and adults that they cannot keep secrets and may need to share information to keep them safe.
Full guidance is in **Section 15 — Information Sharing & Consent**.

### 11.9 Overview Flowchart

A visual summary of this reporting process is provided in **Appendix D — Safeguarding Reporting Flowchart**.

## 12. RESPONDING TO DISCLOSURES

Children, young people and adults at risk may choose to disclose abuse or concerns in many ways. A disclosure may happen suddenly, gradually, indirectly, or through behaviour rather than words.
How staff respond in that moment can significantly affect the person's safety, trust and wellbeing.

This section explains how to respond safely and appropriately.

### 12.1 Principles for Responding to a Disclosure

When someone tells you something that indicates they are at risk of harm:

- **Listen carefully -** Let them speak in their own words. Do not interrupt or ask leading questions.
- **Stay calm and patient -** Your role is to create a safe, non-judgemental space.
- **Believe and take them seriously -** It is not your role to judge whether the disclosure is true.
- **Reassure them -** Use simple statements such as:
  *"You've done the right thing by telling me."*
  *"I'm glad you told me this."*
- **Be clear you cannot keep secrets**
  Say:
  *"I may need to share this with someone who can help keep you safe."*
  Avoid promising confidentiality.
- **Explain what will happen next.** Tell them:
  - you will need to talk to the Designated Safeguarding Officer
  - they are not in trouble
  - you will support them through the process
- **Do not investigate -** Your responsibility is to **report**, not to prove or disprove.
- **Record accurately** - Note their exact words when possible.

### 12.2 What Not to Do

Staff and volunteers must **not**:

- ask leading questions (e.g., “Did your dad hit you?”)
- press for details they do not volunteer
- express shock, disbelief or anger
- make assumptions or fill in gaps
- promise to keep secrets
- approach the alleged perpetrator
- question other children or adults about the disclosure
- attempt to resolve the situation independently

These actions can compromise evidence, retraumatise the individual, or put them at greater risk.

### 12.3 If the person is in immediate danger

Follow **Section 11** (reporting concerns):

- Call **999**
- Then contact the **DSO** as soon as it is safe

### 12.4 Recording a Disclosure

Record the disclosure **as soon as possible**, ideally within one hour and always within the same working day.

Your record must include:

- the child/young person/adult’s name and age
- date, time and location of the disclosure
- what they said (use their exact words when possible)
- your observations (behaviour, mood, visible injuries)
- any questions you asked (should be minimal)
- who was present
- actions taken (e.g., informed DSO, called 999)
- your name, role and signature

Do **not include opinions, assumptions or interpretations.**

**Send your written record to the DSO immediately.**
**Keep a copy securely until the DSO confirms receipt.**

### 12.5 Supporting the Child, Young Person or Adult After a Disclosure

**After reporting the disclosure:**

- stay available if they need reassurance
- avoid discussing the details repeatedly
- maintain normal, supportive interactions
- let the DSO or agencies take the lead
- seek supervision or support if the disclosure affects you emotionally

**Safeguarding can be emotionally impactful; staff wellbeing is also important.**

## 13. RESPONDING TO OBSERVED CONCERNS (NON-DISCLOSURE)

Safeguarding concerns do not arise only from disclosures. Staff and volunteers may become worried because of something they **see, hear, or observe**, or because of a **change in behaviour**. All concerns — no matter how small they may seem — must be taken seriously.

You do **not** need proof of harm to act.
You only need a concern.

### 13.1 Types of Observed Concerns

Observed concerns may include:

| | |
|---|---|
| **Physical indicators**<br><br>• unexplained bruises, burns or injuries<br>• injuries in unusual locations (e.g., torso, back, upper arms)<br>• repeated injuries or inconsistent explanations | **Behavioural indicators**<br><br>• sudden changes in behaviour, confidence or mood<br>• aggression, withdrawal, anxiety or extreme clinginess<br>• sexualised language or behaviours not age-appropriate<br>• fearfulness around specific people or situations |
| **Environmental indicators**<br><br>• signs of neglect or poor care<br>• unsafe home conditions (shared during conversation or visual observation)<br>• parents/carers appearing intoxicated or hostile when collecting a child | **Disclosure through behaviour**<br><br>Sometimes a child or adult communicates harm through actions rather than words:<br>• self-harm<br>• repeated running away<br>• substance misuse<br>• statements such as “I hate going home” or “I don’t feel safe” |

### 13.2 Immediate Actions for Staff

If you observe something worrying:

| | |
|---|---|
| **1. Stay calm and observe carefully** | Do not confront the child or adult with assumptions. |
| **2. Offer a safe, supportive presence** | If appropriate, gently check how they are feeling without asking leading questions.<br>Examples of safe prompts:<br>– *"You seem a bit upset today — is everything okay?"*<br>– *"I'm here if you need to talk."* |
| **3. Do not pressure them to disclose** | You only need enough information to know that a concern exists. |
| **4. Record what you observed** | Include:<br>– what you saw or heard<br>– dates, times, and locations<br>– context (e.g., session, activity, online interaction)<br>– the individual's behaviour, mood, or response |
| **5. Report to the DSO on the same day** | Follow the steps in Section 11. |

### 13.3 What Staff Must Not Do

Do **not**:

- make assumptions about what happened
- ask leading or investigative questions
- speak to the suspected person who may have caused harm
- promise to keep observations or concerns secret
- wait to see if the situation improves
- rely on your personal judgement to decide if it is "serious enough"

If you are worried, **you must report**.

### 13.4 When to Contact 999

If the observed concern suggests **immediate danger**, staff must call **999**.

Examples:

- significant injury or visible harm
- observing violent behaviour or threats
- a child runs away in a dangerous situation
- a person expresses imminent intent to harm themselves or others

After calling emergency services, inform the DSO as soon as possible.

### 13.5 The DSO's Role After Receiving an Observed Concern

The DSO will:

- review the information
- consult with the child or adult if appropriate
- decide whether thresholds for referral are met

refer to:

- Hounslow MASH
- Hounslow Adult Social Care
- Police
- record all decisions and actions taken

Observed concerns are equally valid as disclosures and must be treated with the same seriousness.

## 14. INFORMATION SHARING & CONSENT

Safeguarding often requires staff to share sensitive information with the Designated Safeguarding Officer (DSO), partner agencies or statutory services.
HAY follows national guidance that makes clear:

**Safeguarding concerns override confidentiality.**

You do not need consent to share information if a child, young person or adult at risk is in danger or may be harmed.

Information must always be shared **lawfully, proportionately and in the best interests** of the individual.

### 14.1 When Consent Is Not Required

Staff **must not** wait for consent if:

- a child or adult is at risk of significant harm
- a crime may have been committed
- there is risk of domestic abuse
- someone is unable to protect themselves due to care and support needs
- delaying sharing information would increase the risk

This is in line with:

- Working Together 2023
- Care Act 2014
- Domestic Abuse Act 2021
- UK GDPR (safeguarding exemption)

In these cases, information **must** be shared with the DSO or relevant agencies immediately.

### 14.2 When Consent Should Be Sought

Where it is safe and appropriate, consent should be considered when:

- sharing early help information
- signposting to services
- discussing non-urgent wellbeing needs

Consent must be:

- **informed** (the person understands what they are agreeing to)
- **voluntary**
- **specific** (what, why, who with)

However, consent is **never** the deciding factor for safeguarding.

### 14.3 Explaining Information Sharing to Children, Young People & Adults

Staff must be honest and clear.

If someone shares a concern or disclosure, say:

- *"I can't keep this a secret, because my job is to help keep you safe."*
- *"I will only share information with people who need to know and can help."*
- *"You're not in trouble — this is to help protect you."*

This builds trust while maintaining transparency.

### 14.4 Principles of Lawful Information Sharing

HAY follows the **Seven Principles** of the Government's Information Sharing Guidance (2024):

1. **The safety and wellbeing of the person is the priority.**
2. **You can share information without consent if someone is at risk.**
3. **Seek consent where safe and appropriate — but do not delay a referral.**
4. **Share only what is necessary, relevant and proportionate.**
5. **Share with the right people at the right time.**
6. **Record what you shared, with whom, and why.**
7. **Be open and honest unless doing so increases risk.**

### 14.5 What Staff Are Allowed to Share

Staff may share information with the DSO or statutory agencies about:

- disclosures or allegations
- observed injuries or behaviours
- concerns about home environment or supervision
- online harms or exploitation
- comments that indicate risk
- concerns about staff, volunteers or partner staff

Staff must **not** share safeguarding information with:

- friends or family
- colleagues not involved in safeguarding
- other service users
- unauthorised external organisations

### 14.6 Record Keeping and Secure Storage

All safeguarding information must be:

- factual and accurate
- written on the same day
- stored securely by the DSO
- shared on a need-to-know basis only

Records will be retained in accordance with statutory guidance:

- **50 years** for safeguarding records
- longer for allegations against staff, if required by DBS/Charity Commission

## 15. RECORD KEEPING (Safeguarding Records)

Accurate and timely recording is essential to safeguarding practice.
This section outlines HAY's expectations for **safeguarding-specific** records.
For wider organisational processes, staff must refer to the **HAY Record Keeping Policy**.

### 15.1 What Must Be Recorded

When a safeguarding concern arises, staff must record:

- what was seen, heard or reported
- the date, time and location
- the exact words used (for disclosures)
- any injuries or observations of behaviour
- who was present
- actions you took (e.g., reassurance, contacting DSO, calling 999)
- who you reported the concern to and when

Records must be **factual, clear and neutral** — avoid assumptions or interpretations.

### 15.2 When to Record

- Write notes **as soon as possible**, ideally within one hour.
- All notes must be submitted to the DSO **within the same working day**.
- Keep a temporary copy only until the DSO confirms receipt, then destroy securely.

### 15.3 Storage

All safeguarding records:

- are stored securely by the DSO (digitally or locked storage)
- are kept separate from general staff or participant files
- are accessible only to authorised safeguarding personnel
- comply with UK GDPR and the Data Protection Act 2018

### 15.4 Retention Periods

HAY follows statutory safeguarding retention periods:

- **Children's safeguarding records:** 50 years
- **Adults at risk:** at least 7 years (or 50 years if the concern occurred when the individual was a child)
- **Allegations against staff or volunteers:**
  Retain until the individual reaches normal retirement age **or** 10 years — whichever is longer.

### 15.5 Safeguarding Log

The DSO maintains an internal safeguarding log to track:

- patterns
- repeat concerns
- follow-up actions
- case status

This log does **not** replace full case files.

### 15.6 Link to Full Policy

This section summarises safeguarding expectations.
For wider guidance on documentation standards, digital storage, organisational retention schedules and access controls, staff must read the **HAY Record Keeping Policy**.

## 16. ALLEGATIONS AGAINST STAFF, VOLUNTEERS, MENTORS OR TRUSTEES (Including LADO Process)

Allegations or concerns about the behaviour of any adult working for or connected with HAY must be taken seriously and acted upon immediately.
Children, young people and adults at risk can be harmed by people in positions of trust, and organisations must respond swiftly and transparently.

This section applies to **all** HAY employees, volunteers, mentors, trustees, contractors, sessional workers and partner staff.

### 16.1 What Counts as an Allegation?

An allegation is information that suggests a person who works with children or adults at risk has:

1. **Harmed or may have harmed a child or adult at risk**
2. **Committed a criminal offence against or related to a child or adult at risk**

3. **Behaved in a way that indicates they may pose a risk to children or adults at risk**
4. **Behaved in a way that raises concerns about their suitability to work with vulnerable groups**
5. **Behaved in their personal life in a way that may impact their professional role**
6. **Used inappropriate, sexualised, or abusive behaviour online**

This includes behaviour outside the workplace if it may impact their suitability.

### 16.2 Immediate Actions for Staff

If you witness, receive, or suspect an allegation about an adult:

**X Do NOT investigate**

X Do NOT question the person the allegation is about

X Do NOT speak to other staff about it

X Do NOT confront the child or adult with assumptions

You must:

**1. Record the concern clearly and factually**

Include what was said, seen, or heard — use exact words if possible.

**2. Report to the Designated Safeguarding Officer (DSO) immediately**

Regardless of whether it seems minor or unclear.

- If the allegation involves the DSO: ➞ **Report to the CEO**
- If the allegation involves the CEO: ➞ **Report to the Chair of Trustees**
- If the allegation involves the Chair of Trustees: ➞ **Report to the NSPCC Whistleblowing Helpline**

### 16.3 The DSO's Immediate Responsibilities

Upon receiving an allegation, the DSO must:

**✓ Ensure immediate safety**

(remove the staff member from contact if needed)

**✓ Inform the CEO (unless the allegation is about the CEO)**

**✓ Contact the Local Authority Designated Officer (LADO) within 1 working day**

This is a statutory requirement.

The DSO must not wait for additional information or attempt to verify the allegation before contacting LADO.

### 16.4 When to Contact the LADO

The LADO must be consulted in the following situations:

- Allegations of physical, emotional or sexual harm
- Inappropriate behaviour or boundary violations
- Grooming concerns
- Criminal behaviour (including online offences)
- Concerning behaviour outside of work
- Repeated low-level concerns that form a worrying pattern
- Behaviour that suggests the person may pose a risk

If unsure **whether the threshold is met**, the DSO must still seek LADO advice.

### 16.5 LADO Process

Once contacted, the LADO will:

- review the information provided
- decide whether the threshold for a formal process is met
- determine the next steps, which may include:
  - strategy meeting
  - police involvement
  - children's or adults' social care involvement
  - internal procedures
- advise on immediate risk management
- monitor the case until resolution

HAY must cooperate fully with the LADO and any statutory agencies involved.

This process takes precedence over internal HR procedures.

### 16.6 Suspension and Alternative Duties

Suspension is **not an automatic response**, but may be necessary if:

- a child or adult is at immediate risk
- police request it
- it is required to preserve evidence
- the alleged behaviour makes continuing work unsafe

Other measures may include temporary supervised duties or relocation.

The decision is made by the CEO in consultation with the DSO, LADO and trustees.

### 16.7 Internal Investigation and Disciplinary Action

HAY may conduct its own internal procedures **only when advised** by LADO that it is appropriate and will not interfere with statutory processes.

Outcomes may include:

- no further action
- training or increased supervision
- warnings
- dismissal
- referral to the DBS

### 16.8 Duty to Refer to the DBS

The CEO must refer individuals to the **Disclosure and Barring Service (DBS)** if they:

- have been dismissed due to safeguarding concerns
- would have been dismissed had they not resigned
- harmed or posed a risk of harm to a child or adult at risk

This is a **legal obligation**.

The Safeguarding Trustee must be informed of all referrals.

### 16.9 Confidentiality and Record Keeping

All records related to allegations must be:

- stored securely by the DSO
- separate from the individual's main HR file
- factual, dated and signed
- retained in line with statutory guidance:

**Until the person reaches normal retirement age OR 10 years — whichever is longer.**

A copy of the allegation record must be provided to the individual unless prohibited by police or LADO.

### 16.10 Support for All Parties Involved

Children and adults allegedly harmed must receive appropriate support.

Staff or volunteers who are the subject of an allegation must be:

- informed of the allegation (unless restricted by LADO or police)
- offered support, including a named contact not involved in the investigation
- updated on the process as permissible

False or malicious allegations will be dealt with under appropriate disciplinary procedures.

### 16.11 Low-Level Concerns (Emerging Patterns)

HAY encourages staff to share "low-level concerns", such as:

- boundary crossing
- unprofessional language

- inappropriate communication
- repeated minor incidents that cause unease

The DSO will monitor such concerns and may consult LADO if patterns emerge.

Early reporting prevents harm and protects staff from false assumptions.

## 17. WHISTLEBLOWING & PROFESSIONAL CHALLENGE

HAY is committed to an open and transparent safeguarding culture.
All staff, volunteers and trustees must feel able to raise concerns about unsafe practice, poor safeguarding decisions or inappropriate behaviour.

This section outlines safeguarding-specific whistleblowing routes.
For the wider organisational procedure, staff must refer to the **HAY Whistleblowing Policy**.

### 17.1 What to Raise Under Whistleblowing

Use whistleblowing if you believe:

- safeguarding concerns are not being addressed properly
- unsafe practice or boundary violations are occurring
- a colleague's behaviour increases risk
- concerns are being minimised, ignored or discouraged
- the DSO or senior staff have not escalated a concern appropriately

### 17.2 Professional Challenge

Safeguarding requires respectful challenge when:

- you disagree with a threshold decision
- you believe a referral should have been made
- information has not been shared appropriately
- there is ongoing risk

If concerns remain, staff must follow the **Hounslow multi-agency escalation procedure**.

### 17.3 How to Raise a Safeguarding Whistleblowing Concern

Concerns may be raised with:

**1. The Designated Safeguarding Officer (DSO)** Unless the concern involves them.

**2. The CEO** If the concern involves the DSO or senior management.

**3. The Chair of Trustees** If the concern involves the CEO or leadership.

**4. External Routes (if internal routes feel unsafe):**

- **NSPCC Whistleblowing Advice Line:** 0800 028 0285
- **Local Authority Designated Officer (LADO)** – for concerns about staff behaviour
- **Charity Commission** – serious incident reporting
- **Police** – where a crime may have occurred

- Anonymous concerns will be taken seriously.

### 17.4 Protection for Whistleblowers

Anyone raising a safeguarding concern in good faith will be:

- protected from retaliation
- supported appropriately
- listened to
- treated with confidentiality (unless external agencies require disclosure)

Malicious or knowingly false allegations will be addressed through appropriate HR or volunteer procedures.

### 17.5 Link to Full Policy

This section provides safeguarding-specific whistleblowing guidance.
The full organisational process, including protections and reporting mechanisms, can be found in the **HAY Whistleblowing Policy**.

## 18. SAFER WORKING PRACTICE

Safer working practice ensures that children, young people and adults at risk are protected, and that staff, volunteers and mentors maintain professional boundaries that safeguard everyone involved.
It applies to all HAY staff, volunteers, trustees, mentors, contractors and partner organisations.

This section outlines essential expectations for day-to-day interactions.

### 18.1 General Principles

All staff must:

- act as positive role models
- maintain appropriate personal and professional boundaries
- ensure interactions are open, transparent and recorded where necessary
- avoid situations that may be misinterpreted
- follow safeguarding procedures consistently
- report concerns immediately

Safer working practice protects service users **and** staff from allegations or misunderstandings.

## 18.2 Physical Contact

✓ **Physical contact must only be:**

- appropriate,
- necessary,
- proportionate, and
- in response to a clear need (e.g., first aid, safety, or distress).

✗ **Staff must not:**

- initiate unnecessary physical contact
- give physical comfort that could be misinterpreted
- use physical restraint except as a last resort and in line with HAY's Behaviour/Restraint guidance

If a child or young person seeks physical comfort, staff should respond professionally and redirect where appropriate.

## 18.3 One-to-One Working

Where one-to-one interactions are part of a programme (e.g., mentoring):

- meetings must be planned, recorded and risk assessed
- staff should use open, visible spaces wherever possible
- if privacy is required, ensure another adult is nearby and aware
- doors should remain open where feasible
- the DSO must be informed of any unexpected one-to-one situations that arise

Staff must not arrange one-to-one meetings off-site unless approved and risk assessed.

## 18.4 Online & Digital Safety

When working online or using digital platforms:

- only use HAY-approved systems
- maintain professional language and behaviour
- avoid personal accounts, phone numbers or private messaging
- respond only during appropriate working hours
- record any safeguarding concerns arising online and report immediately
- do not share personal images, content or opinions that compromise professionalism

Staff must not "friend", follow, or privately message service users on personal social media accounts.

## 18.5 Professional Communication

✓ **Communication with service users must be:**

- purposeful and related to their engagement with HAY
- proportionate to your role
- respectful and professional
- recorded when relevant to safeguarding or support

✗ **Staff must not:**

- use informal or overly familiar language
- send messages late at night
- discuss personal or intimate information
- communicate on personal devices or accounts

Any concerning messages received from a service user must be reported to the DSO.

### 18.6 Gifts, Favouritism & Personal Relationships

Staff must not:

- give or accept personal gifts (unless agreed with a manager)
- show favouritism or create exclusive relationships
- share personal problems or seek emotional support from service users
- arrange meetings outside sessions or activities
- develop personal, romantic or sexual relationships with service users (illegal with under-18s, gross misconduct in all cases)

Neutral, professional boundaries ensure fairness and safety.

### 18.7 Transporting Children & Young People

Staff must not transport service users in personal vehicles unless:

- it is planned, approved and risk assessed
- parental/carer consent is obtained
- another adult is present whenever possible
- In emergencies where risk requires transport:
- the DSO must be informed as soon as possible
- the transport must be recorded (time, reason, distance, who was present)

### 18.8 Managing Behaviour Safely

Staff must:

- follow behaviour management guidelines
- avoid any physical punishment or degrading treatment
- intervene calmly and proportionately
- use de-escalation techniques
- record and report any significant incidents or physical interventions

Children and young people must never be shouted at, humiliated or threatened.

### 18.9 Personal Conduct Outside Work

Staff must be aware that behaviour outside work may impact their suitability to work with children or adults at risk.

Examples include:

- criminal behaviour
- harmful online activity
- inappropriate social media use
- domestic abuse or violent behaviour
- substance misuse

Any concerns about suitability must be reported to the DSO.

### 18.10 Support for Staff

HAY recognises that working with vulnerable groups can be emotionally demanding. Staff will be offered:

- supervision
- debriefs after safeguarding incidents
- access to support and guidance from the DSO or manager

Maintaining staff wellbeing is part of a safe organisational culture.

## 19. ONLINE SAFETY & DIGITAL PRACTICE

HAY is committed to creating a safe digital environment for all children, young people, adults at risk, staff and volunteers. Online interactions carry unique risks, and safeguarding responsibilities apply equally in digital spaces as they do in physical settings.

This section outlines safe practice for using digital platforms, social media, messaging tools and online resources when working with or communicating about service users.

### 19.1 General Principles of Online Safety

All online contact with service users must be:

- **professional**
- **purposeful**
- **transparent**
- **recorded where necessary**
- **conducted via HAY-approved systems only**

Staff must apply the same professional boundaries online that they follow in person.

### 19.2 Approved Platforms & Accounts

Staff and volunteers must:

- use only HAY-approved accounts, emails or platforms
- never use personal email, phone numbers or social media accounts
- ensure online tools are secure and GDPR-compliant
- gain DSO/manager approval before using a new digital platform with service users

HAY will not permit platforms that compromise safety or privacy.

### 19.3 Contacting Children, Young People or Adults at Risk Online

When communicating digitally:

**✓Staff must**

- keep communication factual, brief and work-related
- send messages during appropriate working hours only
- maintain appropriate tone and boundaries
- ensure parents/carers are aware when communication with under-18s is required
- report any concerning communication to the DSO immediately

**✗ Staff must never:**

- chat informally or socially
- use emojis, slang or overly personal language that blurs boundaries
- communicate privately on personal devices
- “friend”, follow or DM service users on social media
- delete messages or use disappearing-message features
-

**Transparency protects both service users and staff.**

### 19.4 Online Group Work & Virtual Sessions

When delivering group activities or one-to-one support online:

- staff should log in early to create a safe environment
- cameras should be used where appropriate and with consent
- staff should use neutral, professional backgrounds
- a waiting room or controlled access should be used to manage participants
- parents/carers should be informed if children join group sessions
- sessions must be monitored throughout
- any concerning behaviour must be reported and recorded

Where possible, **two adults** should be present in online group sessions.

### 19.5 Managing Safeguarding Concerns Online

Safeguarding concerns may arise online through:

- messages indicating harm or distress
- inappropriate content shared by a participant
- concerning posts or profile information
- disclosure through chat functions
- harmful online behaviour (bullying, exploitation, coercion, grooming)

All online concerns must be:

1. **recorded factually**
2. **screenshotted or saved where safe and appropriate**
3. **reported to the DSO immediately**
4. followed through according to HAY's reporting procedure

Do not promise confidentiality or attempt to resolve the concern independently.

### 19.6 Social Media

Staff must not:

- communicate with service users via personal social media
- comment on or like posts from service users
- share personal opinions, photos or content that undermine professional boundaries
- post any identifying information about service users

HAY's social media must be used ethically and in line with organisational consent processes.

Staff who observe concerning content on a service user's social media (e.g., self-harm threats, violence, sexual exploitation) must report it to the DSO immediately.

### 19.7 Online Safety for Service Users

HAY promotes safe online behaviour by:

- teaching service users about digital safety
- supporting young people to identify online risks (e.g., grooming, coercion, exploitation)
- encouraging critical thinking about online content
- empowering them to report concerns
- signposting to online safety resources (e.g., CEOP, Childline, NCA, ThinkUKnow)

### 19.8 Data Protection & Secure Use of Technology

To comply with UK GDPR and the Data Protection Act 2018:

- personal data must not be stored on personal devices
- cloud storage must be HAY-approved
- video sessions must not be recorded unless formally agreed and risk assessed
- identifiable information must be shared only on a need-to-know basis

### 19.9 Online Safety Incidents

Any online safety breach, mistake or concern (e.g., accidental sharing of personal data, inappropriate contact, unsafe platform use) must be:

- reported immediately to the DSO
- recorded
- reviewed and addressed
- used as learning to improve practice

## 20. OFF-SITE ACTIVITIES, TRIPS & COMMUNITY EVENTS

HAY delivers a range of activities in community settings, outdoor spaces and external venues. Safeguarding responsibilities apply **before, during and after** all off-site events.
This section outlines the measures required to ensure the safety and wellbeing of all participants.

### 20.1 Planning Safely

| All off-site activities must be: | Planning must consider: |
|---|---|
| • risk assessed in advance<br>• approved by a manager or designated officer<br>• staffed appropriately with clear roles and responsibilities<br>• supervised by adults who understand safeguarding expectations<br>• accessible and inclusive for all participants | • venue safety<br>• transport arrangements<br>• staffing ratios<br>• participants' individual needs and risks<br>• emergency procedures<br>• weather or environmental conditions<br>• first aid availability |

**Activities must not take place until approval is granted.**

## 20.2 Risk Assessments

| All off-site activities must be: | Planning must consider: |
|---|---|
| • risk assessed in advance<br>• approved by a manager or designated officer<br>• staffed appropriately with clear roles and responsibilities<br>• supervised by adults who understand safeguarding expectations<br>• accessible and inclusive for all participants | • venue safety<br>• transport arrangements<br>• staffing ratios<br>• participants' individual needs and risks<br>• emergency procedures<br>• weather or environmental conditions<br>• first aid availability |
| **A written risk assessment is required for:** | **Risk assessments must include:** |
| • trips or outings<br>• community events<br>• residentials<br>• sporting or physical activities<br>• any event involving external venues | • hazards and control measures<br>• staff responsibilities<br>• emergency contacts<br>• participant-specific risks (medical, behavioural, safeguarding)<br>• consent requirements |

**Risk assessments must be reviewed on the day of the activity in case circumstances change.**

## 20.3 Consent and Information

| Parents/carers of under-18s must provide: | For young adults (18–25), staff should obtain: | Staff must be aware of: |
|---|---|---|
| • informed consent for off-site activities<br>• medical/emergency information<br>• contact details | • consent where appropriate<br>• relevant risk information<br>• emergency contacts | • allergies<br>• medication needs<br>• disability or SEND requirements<br>• behavioural triggers<br>• safeguarding vulnerabilities |

Contact details for all participants must be secure and accessible on the day.

### 20.4 Staffing Ratios

Staffing ratios must reflect:

- age of participants
- location and activity risk
- number of participants
- gender balance where appropriate

Minimum recommended ratios:

- **Under 12 years:** 1 adult per 6–8 children
- **Ages 12–18:** 1 adult per 8–10 young people
- **Mixed-gender groups:** both male and female staff where possible
- **Higher-risk activities:** additional staff may be required

Ratios may be adjusted depending on vulnerability or SEND needs.

### 20.5 Transporting Participants

Transport must be:

- planned, approved and risk assessed
- provided by licensed operators or HAY-approved drivers
- supervised appropriately (including pick-up/drop-off points)

Personal vehicles must **not** be used unless:

- authorised and risk assessed
- insured for business use
- consent is obtained
- the DSO/manager is informed

Unexpected emergency transport must be:

- recorded
- reported to the DSO
- explained to parents/carers

### 20.6 Supervision During Activities

Staff must:

- remain vigilant and engaged
- know where each participant is at all times
- conduct regular head counts
- ensure toilets, changing rooms or secluded areas are supervised appropriately
- avoid being alone with a participant unless approved and risk assessed

Staff must respond immediately to any safeguarding concern.

### 20.7 Managing Incidents or Emergencies

If a safeguarding incident occurs off-site:

- Ensure the immediate safety of the child, young person or adult at risk
- Call 999 if necessary
- Inform the DSO as soon as it is safe
- Record the incident in detail upon return
- Follow the reporting steps outlined in Section 11

Near misses or concerning behaviour must also be recorded and reviewed.

### 20.8 Use of Photos, Videos & Media

Staff must:

- follow HAY's photography and media consent processes
- not take photos on personal devices
- ensure participants know when photos will be taken
- respect individuals who do not consent
- follow GDPR and safeguarding requirements

Images must only be taken, stored and used for approved purposes.

### 20.9 External Venue Safeguarding

When using external venues (community centres, sports facilities, youth hubs):

- staff must check the venue has safe conditions
- exits and evacuation routes must be clear
- staff must know who to contact in an emergency
- lone access areas should be avoided

Partner organisations must meet HAY's safeguarding standards for joint activities.

### 20.10 Residentially, Camps or Overnight Trips

Where activities include overnight stays:

- a detailed safeguarding plan is required
- sleeping arrangements must be safe, appropriate and supervised
- staff and participant bedrooms must be separate
- staff must conduct night-time checks appropriately
- there must be clear procedures for illness, distress or emergencies
- a designated first aider must be present

Residentials require additional approval from the CEO or senior management.

**Signed:**

**Name (please print):** **Muzamil Tahir**

**Position:** **HAY Trustee & Treasurer**

**Date:** **17 / 12 / 2025**

**Review Date:** **December 2026**

## APPENDIX A — TYPES & INDICATORS OF ABUSE

Safeguarding concerns may arise through what a child, young person or adult at risk says, does, shows, or how they behave.
Abuse may involve a single incident or repeated acts, and it may occur in person or online.

The categories below reflect current UK statutory guidance.

### A1. Physical Abuse

Physical abuse involves causing physical harm.

| It may include: | Possible Indicators: |
|---|---|
| • hitting, slapping, punching, kicking<br>• shaking, throwing, biting, burning or poisoning<br>• fabricating or inducing illness (FII)<br>• inappropriate restraint or rough handling<br>• misuse of medication | • unexplained injuries or inconsistent explanations<br>• injuries in unusual places (e.g., torso, back, upper arms)<br>• defensive or fearful behaviour around certain people<br>• frequent absences due to “accidents”<br>• marks with patterns (belt, cord, handprint)<br>• multiple injuries at different healing stages |

### A2. Emotional or Psychological Abuse

Emotional abuse is persistent emotional maltreatment that impacts wellbeing and development.

| It may include: | Possible Indicators: |
|---|---|
| • humiliation, threats, intimidation<br>• constant criticism or rejection<br>• controlling behaviour<br>• coercive control (Domestic Abuse Act 2021)<br>• isolating someone from friends or support<br>• making someone feel frightened, worthless or dependent | • low confidence, anxiety, withdrawal<br>• fear of making mistakes or upsetting others<br>• extreme clinginess or need to please<br>• self-harm, eating difficulties<br>• sudden behavioural changes<br>• overcompliance or submission |

### A3. Sexual Abuse & Sexual Exploitation

Sexual abuse involves forcing or enticing a child or adult into sexual activities, regardless of whether they appear to consent.

| This Includes: | Possible Indicators: |
|---|---|
| • rape or sexual assault<br>• sexual touching<br>• encouraging a child to engage in sexual activity<br>• non-contact abuse (e.g., exposure to pornography)<br>• grooming online or in person<br>• exploitation through images or videos<br>• CSE (Child Sexual Exploitation): where a child is manipulated or coerced into sexual activity in exchange for something (money, status, protection, attention) | • sexualised behaviour or language not age-appropriate<br>• unexplained gifts or money<br>• secretive behaviour or older “friends”<br>• repeated STIs or pregnancy (young people)<br>• self-harm, emotional distress<br>• fear of certain people or locations<br>• sexually explicit messages or images on devices |

### A4. Neglect

Neglect is the persistent failure to meet basic physical or emotional needs.

| It may Involve : | Possible Indicators: |
|---|---|
| • inadequate food, shelter or clothing<br>• failing to provide medical or dental care<br>• lack of supervision or unsafe home environments<br>• ignoring emotional needs<br>• persistent absence from school (children) | • poor hygiene, dirty clothing<br>• hunger, malnutrition, tiredness<br>• unattended medical needs<br>• poor growth or weight gain<br>• frequent absences<br>• unsafe behaviour due to lack of supervision |

### A5. Domestic Abuse (Children & Adults)

Domestic abuse includes controlling, coercive, threatening or violent behaviour between intimate partners or family members (Domestic Abuse Act 2021).

Children are recognised as victims in their own right.

| Forms include: | Possible Indicators: |
|---|---|
| • physical, emotional, sexual or financial abuse<br>• coercive control<br>• intimidation or threats<br>• online harassment<br>• stalking | • fearfulness at home<br>• behavioural regression or anxiety<br>• injuries with unclear explanations<br>• controlling partner behaviours<br>• limited freedom or isolation |

### A6. Child Criminal Exploitation (CCE)

CCE involves using children or young people to commit crimes such as:

| includes: | Possible Indicators: |
|---|---|
| • physical, emotional, sexual or financial abuse<br>• coercive control<br>• intimidation or threats<br>• online harassment<br>• stalking | • going missing or staying out late<br>• unexplained money or new items<br>• associating with risky peers or adults<br>• carrying weapons or drugs<br>• travelling to unfamiliar areas<br>• fear of repercussions |

Often involves grooming, coercion, violence, threats, or debt bondage.

### A7. Online Abuse

| Online abuse Includes: | Possible Indicators: |
|---|---|
| • grooming<br>• coercion into sexual activities or image sharing<br>• exposure to harmful content<br>• online bullying or harassment<br>• manipulation through live streaming<br>• blackmail or threats (“sextortion”) | • secrecy around device use<br>• emotional distress after being online<br>• withdrawing from family or friends<br>• large amounts of time online, especially late at night<br>• sexually explicit content on devices |

### A8. Financial or Material Abuse (Adults at Risk)

| Financial abuse includes: | Possible Indicators: |
|---|---|
| • theft or fraud<br>• misuse of money or benefits<br>• controlling access to finances<br>• pressure to change wills or sign documents<br>• exploitation for financial gain | • unexplained withdrawals or missing funds<br>• unpaid bills despite income<br>• sudden changes in financial behaviour<br>• lack of personal possessions |

### A9. Discriminatory Abuse

| Abuse based on: | Possible Indicators: |
|---|---|
| • race or ethnicity<br>• gender or gender identity<br>• age<br>• disability<br>• sexual orientation<br>• religion or belief | • isolation or exclusion<br>• derogatory language used towards the individual<br>• unequal treatment<br>• patterns of bullying linked to identity |

### A10. Organisational / Institutional Abuse (Adults)

Abuse that occurs within settings or systems that provide care, including:

- poor or unsafe practice
- neglect by staff
- rigid routines that disempower individuals
- inappropriate use of restraint
- lack of dignity, respect or autonomy

### A11. Self-Neglect (Adults at Risk)

Includes behaviours that threaten health or safety, such as:

- hoarding
- extreme lack of personal hygiene
- refusal of essential care
- living in unsafe conditions

Self-neglect is addressed under the Care Act 2014.

### A12. Radicalisation & Extremism (Prevent Duty)

Children and adults may be groomed into extremist ideologies through:

| Groomed through | Possible Indicators: |
|---|---|
| • online platforms<br>• peer groups<br>• charismatic individuals<br>• grievance-based narratives | • expressing extremist views<br>• isolation from usual friends<br>• secrecy about online activity<br>• sudden ideological rigidity |

A Prevent referral may be appropriate via the DSO.

### A13. Complex or Combined Abuse

Individuals may experience multiple forms of abuse simultaneously, including:

- domestic abuse + neglect
- sexual abuse + grooming
- criminal exploitation + emotional abuse

Staff must remain open, curious and avoid assumptions.

### A14. Children & Adults Who May Present Higher Risk Indicators

Certain groups may be at greater risk, including:

- care-experienced young people
- unaccompanied asylum-seeking children
- disabled children or adults
- LGBTQ+ young people
- those with mental health needs
- young carers
- those experiencing poverty, homelessness or social exclusion
- communities experiencing discrimination or marginalisation

These are not automatic safeguarding concerns — but they increase vulnerability.

## APPENDIX B — PHYSICAL INTERVENTION & RESTRAINT

HAY staff and volunteers must prioritise the emotional and physical safety of all children, young people and adults at risk.
Physical intervention should only be used in rare and exceptional circumstances, and always as a last resort.

HAY's approach is grounded in de-escalation, trauma-informed practice and the principle of minimum necessary intervention.

### B1. What Is Physical Intervention?

Physical intervention is any use of direct physical contact by staff to:

- guide
- block
- hold
- restrain

a child, young person or adult at risk in order to keep them or others safe. It does not include every day, appropriate physical contact (e.g., assisting someone with mobility if this is part of the planned activity).

### B2. When Physical Intervention May Be Used

Physical intervention may be used only when absolutely necessary and when:

1. There is an immediate risk of serious harm to the child, young person, adult at risk, staff member or another person
2. All other strategies have failed or are not possible
3. It is the safest available option

**Examples:**

- preventing a child from running into a busy road
- stopping an assault or serious physical fight
- preventing the use of a weapon
- stopping behaviour that poses immediate danger (e.g., attempting to jump from height)

**Physical intervention must never be used to punish, discipline, or force compliance.**

### B3. What Staff Must Do Before Considering Physical Intervention

Staff must:

- use verbal de-escalation
- give clear instructions or choices
- maintain a calm tone and body language
- remove triggers or move others away if safe
- call for support from colleagues
- consider whether leaving the space temporarily would reduce risk

**Most incidents can be resolved without physical contact.**

### B4. What Physical Intervention Must NEVER Include

**Staff must never:**

- use pain-inducing techniques
- use holds that restrict breathing or circulation
- hold someone face-down (prone restraint)
- pin someone against a wall or floor
- use restraint for more than the shortest time necessary
- use physical intervention as a routine response

**These actions are dangerous, unlawful, and a safeguarding concern in themselves.**

### B5. Principles of Safe Physical Intervention

If physical intervention is unavoidable, it must be:

| | | |
|---|---|---|
| ✓ | **Reasonable** | Proportionate to the level of risk. |
| ✓ | **Necessary** | No safer alternative exists. |
| ✓ | **Time-limited** | Used only for the shortest duration possible. |
| ✓ | **Respectful** | Protecting dignity, privacy and emotional wellbeing. |
| ✓ | **Trauma-informed** | Avoiding force that may retraumatise, especially for survivors of violence or abuse. |

### B6. After Physical Intervention

As soon as the individual is safe:

- release the hold immediately
- offer reassurance
- use calming strategies and grounding techniques
- give space if needed
- avoid confrontation or blame
- ensure the individual is emotionally supported

Support must be provided to both the individual involved and staff.

### B7. Recording and Reporting

Any use of physical intervention must be:

- recorded in writing on the same day
- reported immediately to the DSO
- included in the safeguarding log
- followed by a debrief with a manager or the DSO

Records must include:

- what led to the incident
- attempts to de-escalate
- the type of intervention used
- the duration

- who was involved
- any injuries
- actions taken afterwards

If a child or adult is injured, appropriate first aid or medical care must be sought and recorded.

### B8. Notifying Parents/Carers and Relevant Agencies

The DSO will ensure that:

- parents/carers of under-18s are informed as appropriate
- external agencies (Social Care / SEND / placement workers) are notified when required
- if the incident raises a safeguarding concern, it is escalated following HAY's reporting procedure

### B9. Training and Competence

Staff may only use physical intervention when:

- they have received appropriate training (if applicable), and
- they are acting within the scope of HAY's safeguarding and behaviour guidelines.

Staff who have not been trained must still intervene only in extreme emergencies where immediate safety is at risk.

### B10. Physical Intervention with Adults at Risk

Under the Care Act 2014, staff must consider:

- the adult's right to autonomy
- the principle of least restrictive action
- whether the adult lacks capacity in the moment
- whether intervention could cause trauma or distress

If the adult has a support plan, staff must follow agreed strategies wherever possible.

## APPENDIX C — SAFEGUARDING CONTACT LIST

This appendix provides essential contact details for reporting safeguarding concerns, seeking advice and responding to emergencies. Staff must use these contacts in line with the procedures set out in this Safeguarding Policy. All details are correct at time of writing but should be reviewed annually.

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C1. EMERGENCY CONTACTS

Emergency Services (Police / Ambulance / Fire) **999**

Use when there is immediate danger, risk of harm or a crime in progress.

Non-emergency Police **101**

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C2. HAY INTERNAL SAFEGUARDING CONTACTS

Designated Safeguarding Officer (DSO - *Bijal Karavadra*
Email: *bijal.karavadra@hayonline.org*
Mobile: *07793 210283*

Deputy DSO – *Chris Ngoma*
Email: Chris.ngoma@hayonline.org
Mobile: *07725 858199*

Chief Executive Officer (CEO) - *Debbie Hughes*
Email: *debbie.hughes@hayonline.org*
Mobile: *07843 389673*

Safeguarding Trustee Lead – *Bobby Basra*
Email: *Bobby.basra@hayonline.org*
Mobile: *07712 492093*

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C3. CHILDREN'S SAFEGUARDING CONTACTS (Hounslow)

Hounslow MASH (Multi-Agency Safeguarding Hub)

**020 8583 6600** (option 2) — Mon–Fri, 9am–5pm

mash@hounslow.gov.uk

Out-of-Hours Emergency Duty Team

**020 8583 2222**

Online Referral (Professionals)

https://www.hounslow.gov.uk/mash

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C4. ADULT SAFEGUARDING CONTACTS (Hounslow)

Hounslow Adult Social Care – Safeguarding Adults

**020 8583 3100**

adultsafeguarding@hounslow.gov.uk

Out-of-Hours Emergency Duty Team 020 8583 2222

Online Adult Safeguarding Concern Form

https://www.hounslow.gov.uk/safeguardingadults

C5. LOCAL AUTHORITY DESIGNATED OFFICER (**LADO**) — Hounslow

For allegations against staff, volunteers, mentors, contractors or anyone working with children.
Hounslow LADO Contacts:

**Grace Murphy** - 020 8583 4933 / grace.murphy@hounslow.gov.uk
**Sarah Paltenghi** - 020 8583 3423 / 07970 198380 / sarah.paltenghi@hounslow.gov.uk

LADO Duty Line - 020 8583 4333 (Mon–Fri, 9am–5pm)
Online Information - https://www.hounslow.gov.uk/info/20161/safeguarding_children/1345/lado

C6. PREVENT / RADICALISATION (Hounslow)

Prevent Advice & Referrals - 020 8583 4242 / prevent@hounslow.gov.uk

Police Anti-Terrorism Hotline - 0800 789 321 (confidential)

C7. FGM MANDATORY REPORTING
For staff in regulated activity who suspect FGM in a girl under 18.

Police 101 (urgent but not emergency) / 999 (immediate risk)

FGM Helpline (NSPCC) - 0800 028 3550 / fgmhelp@nspcc.org.uk

C8. NATIONAL SUPPORT & ADVICE SERVICES

NSPCC Helpline (For advice or to report concerns about a child) 0808 800 5000 /

help@nspcc.org.uk

Childline - 0800 1111 (open to all under-19s)

Samaritans 116 123 (confidential emotional support)

National Domestic Abuse Helpline - 0808 2000 247 (24/7 confidential support)

CEOP — Child Exploitation & Online Protection https://www.ceop.police.uk

Cruse Bereavement Support - 0808 808 1677

C9. Escalation and Professional Disagreement
If staff feel that statutory agencies have not responded appropriately:
Hounslow Multi-Agency Escalation Procedure:
https://www.hounslow.gov.uk/safeguardingchildren
Staff may also consult the DSO, CEO or Safeguarding Trustee Lead for guidance.

## APPENDIX D — HAY Safeguarding Procedure Flowchart

***If you have a concern about a child, a young person or an adult***

**Designated Safeguarding Officer (DSO):** Bijal Karavadra 07793 210 283
**If DSO is unavailable – contact CEO:** Debbies Hughes 07843 389673

**Is the Child, Young person in immediate danger?**

**Yes**

- **Call the Police – 999**
- Inform the Manager – DSO as soon as possible and when it's safe to do so

**No**

**Inform the line manager immediately / The Designated Safeguarding Officer (DSO)**

- Provide clear factual information about what you observed/heard
- **Do not investigate yourself**
- **Do not promise confidentiality**

**The DSO will decide whether to:**

- Monitor the situation
- Offer Early Help / Contact Hounslow Children's Services (MASH) / Refer to the Police
- Seek advice from the Local Authority Designated Officer (LADO) if an adult who works with children is involved

**If the DSO is unavailable- Report to:**

1. CEO
2. Chair of Trustees (if the concern involves the CEO)

**Recording**

- Write notes at the earliest opportunity
- Submit to the DSO **the same day**
- Keep information confidential

**Allegations about Staff / Volunteers**

- Report to the DSO immediately
- If the allegation is about the **DSO → CEO**
- If it is about the **CEO → Chair of Trustees**
- A referral to the LADO must be made within 1 working day