

SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY AND GUIDELINES ON RAISING A SAFEGUARDING CONCERN

Reviewed and updated by Safeguarding leads: 3 February 2025 (minor details) Approved by Board of Trustees: 10 May 2022, due for review May 2025
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Policy Statement

For all organisations working with children and/or adults at risk, it is essential to carefully consider safeguarding both those who are in vulnerable circumstances and the staff who work with them. The emphasis has widened in recent years to not only protect people from abuse and neglect but to actively promote their welfare - not just to protect but to **safeguard**.

Clean Break works with adults at risk through our Members programme at our premises in Kentish Town, North London, at other premises, and online, and through our work with women in prisons and community settings. We also have safeguarding responsibilities towards the children of adults who use our services. Occasionally, we may cast children in a theatrical or film production where the script requires it.

Due to the nature of our work we have drawn up this Safeguarding Policy with a set of procedures to put what is intended into practice. All our staff, artists, freelancers, volunteers and consultants will be made aware of our policy and procedures to ensure that they know exactly what to do should abuse be suspected and to help promote best practice. The policy also exists to inform children and adults at risk of their rights and what they should do if they have any concerns.

Clean Break is committed to providing safe and supportive environments for everyone involved in our organisation and the work we do. We aim to create an environment where young people and adults at risk feel secure, valued and listened to at all times and a place where their welfare is promoted. Any concerns will be taken seriously and acted upon appropriately and we will pay attention to what individuals say and feel.

Safeguarding legislation and statutory guidance

As a Charity registered in England and Wales this policy and guidance reflects the requirements set out in the following key legislation and guidance for England including:

- Children Act of 1989 and 2004
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Protection of Freedoms Act 2012
- Care Act 2014
- Modern Slavery Act 2015

- The Children and Social Work Act 2017
- Working Together to Safeguard Children 2018.

Prevent and the Counter-Terrorism and Security Act 2015

The Counter Terrorism and Security Act (February 2015) includes the duty for specified authorities to have due regard of the need to prevent people from being drawn into terrorism. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Clean Break is not a specified authority under Section 26 of the Act, however we may receive funding from public authorities. We recognise our wider safeguarding responsibilities under the Counter Terrorism and Security Act 2015.

If any staff member, artist, volunteer or consultant at Clean Break has any significant concerns about someone at Clean Break beginning to support terrorism and/or extremism, they should raise a safeguarding concern.

Definitions

The term **child** is legally defined as anyone under the age of 18 (as defined by the United National Convention of the rights of a Child 1989).

An **adult at risk** (Care Act 2014) is “a person aged 18 or over who is or maybe in need of community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.”

Safeguarding means promoting and protecting people’s health, wellbeing and human rights and enabling them to live free from harm, exploitation, abuse and neglect.

Safeguarding children and promoting their welfare includes protecting them from maltreatment or things that are bad for their health or development and making sure they grow up in circumstances that allow safe and effective care (Working together to Safeguard Children 2016).

Safeguarding adults includes protecting their rights to live in safety, free from harm, exploitation, abuse and neglect, with people and organisations working together to prevent the risk of harm, exploitation, abuse and neglect, and to stop them from happening, and making sure people's wellbeing is promoted, taking their views, wishes, feelings and beliefs into account. (Care Act 2014)

Child or adult protection is specifically about the steps and measures an organisation puts in place to protect individuals as either suffering or likely to suffer from harm, exploitation, abuse and neglect.

A **safeguarding emergency** is a situation in which a child or adult is in immediate danger and to do nothing would result in actual harm to the individual.

Safeguarding Roles and Responsibilities

All Clean Break representatives have responsibilities to:

- understand and be familiar with the safeguarding policy and guidance
- undertake any appropriate training to support their role
- follow safe working practice
- recognise the signs of harm, exploitation, abuse and neglect
- act appropriately and report concerns **without delay**, following the procedure for reporting safeguarding concerns.

The following positions have specific safeguarding responsibilities.

Board of Trustees

The Board of Trustees has strategic responsibility for ensuring effective safeguarding practice throughout the organisation. They must take steps to ensure that those benefiting from, or working with, Clean Break are not harmed in any way through contact with it. They should ensure the Safeguarding policies and guidance are approved, implemented and monitored. They do this by reviewing and approving this policy, any associated safeguarding guidance or reports and through quarterly reports.

The Board of Trustees will, on occasion, be responsible for working directly with the Executive Team and Designated Safeguarding Lead when a serious incident is being managed.

Executive Team

The Executive Team is responsible for ensuring Clean Break has, and regularly reviews its safeguarding policy, and that there are adequate resources across the organisation for effective implementation across all areas of work. They must advise the Board of Trustees of any major concerns.

Designated Safeguarding Team (consisting of the Lead and two staff, with two Deputy Leads in case of absence)

Clean Break's Head of Participation and Deputy CEO is the Designated Safeguarding Lead. The Designated Safeguarding Lead is the main source of support, advice, and expertise for safeguarding in the organisation and responsible for reporting to the Board of Trustees quarterly and will present an annual safeguarding report.

Two other senior staff are trained to deputise for the Designated Safeguarding Lead in her absence.

Participation team make up the rest of the Designated Safeguarding Team and are trained to respond in an operational capacity to any safeguarding concerns which may arise.

The Executive Director has operational responsibility for Clean Break's HR policies and practice and is therefore responsible for safe staff recruitment practices in Clean Break.

Working with partners

Clean Break will seek mutually beneficial partnerships with organisations in theatre, criminal justice, youth justice, education and the women's sector to ensure that best practice is maintained. When working with partners we will ensure that safeguarding policies and guidance are shared and that all appropriate steps have been taken to safeguard young people and adults.

Monitoring and Review

This Policy and Guidelines document is approved by the Board of Trustees; they will review and approve it at least every three years unless material changes are needed at an earlier point.

The Executive Team will monitor and review this document on an annual basis, or at an earlier point should the need arise, for example if there are minor adjustments needed relating to operational or staffing changes. If there is a legislative change or they have identified new practice, any material changes will be presented to the Board of Trustees for approval.

The Board of Trustees will receive an annual safeguarding report compiled by the Designated Safeguarding Lead and reviewed by the Executive Team. A list of points for inclusion in this report is included in Appendix 4.

The Designated Safeguarding Lead will convene a meeting of the Designated Safeguarding Team quarterly, including the deputy leads, to discuss Clean Break's working practice, any issues that have arisen and improvements that could be made.

Related Policies and Documents

- Data Protection Policy
- Confidentiality Policy
- Boundaries Policy
- Disciplinary Policy
- Equality and Diversity Policy
- Health and Safety Policy
- Whistleblowing Policy

This list of related policies is not exhaustive.

Further information

Any queries or comments about this policy and guidance should be addressed to the Designated Safeguarding Lead.

Policy Owner

This Policy is owned and maintained by the Designated Safeguarding Lead (DSL).

Designated Safeguarding Team

Designated Safeguarding Lead (DSL): Jacqueline Stewart (Head of Participation and Deputy CEO)

In her absence, Deputy DSLs in this order:

Anna Herrmann (Artistic Director and joint CEO)

Natasha Bucknor (Interim Executive Director and Joint CEO)

Other Safeguarding Team members:

Tracey Anderson (Support Manager)

Sophie Connolly (Participation Manager)

Koonyin Ho (Admin and Support Worker)

Our working practice for safeguarding children and adults at risk

Safer recruitment practice

All staff, artists, volunteers and consultants (described in the rest of this document as ‘staff and volunteers’) who have regular contact with Members at Clean Break and participants in offsite settings, should be subject to a careful and rigorous selection and vetting process with the following elements.

- Completion of an application form or letter of application and proof of identity should be provided.
- Taking up two references.
- All interviews will be conducted by a minimum of 2 people.
- Gaps in employment or inconsistencies in a person’s application will be identified and satisfactory explanations for this will be provided.
- Carrying out police checks and checks with the Disclosure and Barring Service in line with our Criminal Records Disclosure Policy.
- Allowing no unsupervised access to children, young people and adults at risk until the above procedures have been completed.

If necessary, Clean Break will seek external professional advice about recruiting someone with a criminal record.

Induction, Training and Supervision for Staff and Volunteers

The training, guidance and supervision of staff is key to the successful operation of a sound Safeguarding Children and Adults at Risk Policy.

Clean Break also recognises that the law in the area of safeguarding is under constant review. The interpretation of the law and professional guidance is likewise subject to continual change. We realise our obligation to keep abreast of developments in this complex area and the need to pass on information to staff and volunteers.

All Clean Break staff and volunteers who have regular contact with children and/or adults at risk are provided with appropriate induction and training. This includes awareness of types of harm, exploitation, abuse and neglect, discussion of policy issues, and guidance on individual responsibilities in handling disclosures and/or allegations of abuse.

Clean Break has drawn up a Boundaries Policy which should be read in conjunction with this Safeguarding Policy which details appropriate conduct and relationships with Members. All staff and volunteers are expected to read, understand and adhere to the boundaries. Training is provided for staff who have regular contact with children and/or adults at risk to explore some of the complex areas within the guidelines, for example, physical contact and receiving gifts.

Management supervision takes place with all staff and volunteers on a regular basis – everyone has a designated manager who oversees their work, training and development.

Staff are required to ensure that Managers are aware of potential problems in the workplace and that inappropriate behaviour is reported through line management arrangements. In addition, there are specific procedures for reporting a safeguarding concern –please see the ‘Staff Action Plan’ section of this policy (p.9 onwards).

All projects are adequately supervised, with observation visits carried out routinely by Managers and Senior Management and any necessary consent required from participants and, where appropriate, their parents/carers.

External clinical supervision is provided on a case by case basis for staff or volunteers working one-to-one or in specific group settings with Members (front line working).

In terms of working practice, all employees are entitled to feel that they are not being put into situations where they could be at danger of malicious or mistaken claims. Employees owe a duty of care to each other, an obligation to support each other in working with girls and women.

Volunteers will not be expected or allowed to work unsupervised at any time unless they have appropriate specialist qualifications e.g. volunteer counsellors.

Because Clean Break’s premises locate offices alongside studios, all staff, **including those not in regular contact** with Members and participants, will be inducted into safeguarding procedures. Regular debriefs will take place between the administrative and operations staff, those who perform front facing duties, and the Participation team.

Minimum training requirements are included as Appendix 3.

Risk assessment and Risk management

The aim of a safeguarding risk assessment is to try to make sure that no one suffers harm. If you identify that something or someone is unsafe, you must do something about it.

Risk management is an ongoing activity and risk assessments will be reviewed annually or when new risks or levels of risk are identified, whichever is sooner.

A safeguarding risk assessment is carried out and documented for each Member during the enrolment process, before they are accepted onto our programme. This considers whether there are any risks to the individual from participating in our programmes as well as whether they may pose any risk to others. If the level or risk to the individual or to others is considered unacceptable, they will not be accepted onto the programme.

Before their first session, all Members are given clear information on their rights and responsibilities and sign an agreement to confirm their understanding of these.

A written health & safety risk assessment is carried out in the development phase of all our activities. Each risk assessment will refer explicitly to safeguarding and will name all

staff with specific safeguarding responsibilities on the activity, ensuring a trained safeguarding lead is available at all times. The safeguarding part of the activity risk assessment will include an assessment of staff suitability, staff to participant ratio, physical or online settings and digital platforms, equipment used, first aid provisions and any other safety considerations.

Building procedures

Clean Break's building operates as a trauma informed space which has been designed to be welcoming and safe. We are equipped with a buzzer activated video entry system. Visitors are screened before they are allowed to enter. Reception is covered at all times.

Operations staff receive awareness training in trauma-informed practice and our Participation team are specialist staff who are skilled at working with trauma and its impact on individuals.

Delivering activities online

The safety and wellbeing of children and adults at risk is paramount when they are using the internet, social media or mobile devices.

Clean Break delivers some workshops, masterclasses, information sessions and meetings online via Zoom or Teams. We also provide some Members with access to portable devices such as laptop computers and wifi routers.

All staff involved in designing or managing aspects of our programme online are given appropriate training and guidance on how to design, manage and risk assess online services. If you are a staff member in the early stages of considering a digital project, a very useful starting point is <https://digisafe.thecatalyst.org.uk/>

All staff involved in delivering aspects of our programme online are given clear and specific information about

- how to behave online
- what to expect from others
- the different types of harm, exploitation, abuse or neglect that could take place online or that they could become aware of through an online setting
- how to support anyone who may need support in Clean Break's online settings

Delivery staff are trained to be alert to safeguarding concerns in online settings, and on how to support and encourage Members to use the internet and portable devices in a way that keeps them safe and shows respect for others.

All Members who receive a loan of a laptop, wifi router or similar will receive clear information about their responsibilities and how they are permitted to use the equipment. Where specific training is needed around safe and appropriate use, this is provided. Before

devices are handed over, all Members sign a loan agreement outlining their responsibilities and permitted use.

Some considerations for working online are included in Appendix 2.

Staff Action Plan for Identifying and Reporting Safeguarding Concerns

A **safeguarding concern** is when someone is worried about the safety or wellbeing of a child or adult at risk because of something seen or heard or information which has been given to them.

How to listen and behave if you receive a safeguarding concern

Our guidance is in two sections:

Section 1: For those not in regular contact with Members or other participants: this includes most operational and administrative staff, including those working on reception. Greeting and having short conversations with Members or participants on a regular basis outside of scheduled activities does not meet our definition of 'in regular contact'.

For those in regular contact with Members or other participants: this means you are either working 1 to 1 with Members or participants as part of your role, or regularly in the room / virtual space during activities involving Members or other participants. E.g. Member support staff, artists leading workshops, volunteers supporting artists leading workshops

Section 1: For those not in regular contact with Members or other participants

The aim of this guidance is to ensure that you signpost individuals or pass information to the Designated Safeguarding Team as early as possible after they begin to disclose sensitive information to you, ideally in advance of receiving information that may give you cause to worry about someone's safety or wellbeing.

- If approached by an individual who begins to share sensitive information, as soon as it is possible let them know that you need to find a member of the Participation team*, who are best placed to support them.
- If you are on reception and take a phone call from a Member or participant in distress, please tell them that you will get the right member of staff to speak to them as soon as possible, check their name and telephone number is accurate before you transfer the call or pass a message to a member of the Participation team.
- In the above situations, if Participation team staff are not available that day due to work schedules or other absences, please inform Deputy DSL Artistic Director (Anna Herrmann) or in her absence Deputy DSL Executive Director (Erin Gavaghan) and they will decide on the course of action.
- If at any point a Member or participant tells you something that specifically makes you concerned for their or someone else's safety or wellbeing, ask for their name and phone number and let them know that you need to pass the information on immediately to the Designated Safeguarding Lead on duty. This will usually be the Head of Participation and Deputy CEO. You should give the name of the person you

will be passing information onto, rather than referring to the title 'Designated Safeguarding Lead'.

- Record an account of the conversation immediately in writing; note the details, date, name, time and telephone number and a brief description of the conversation. Mark this as confidential and email it to the Head of Participation and Deputy CEO or Deputy DSL on duty with the information in the body of the email, not as an attachment. Make sure you have raised the concern verbally within the same day if you do not get a response to your email. You do not need to complete the internal safeguarding concern form (Appendix 5) – this is for staff in regular contact.
- Whatever your concern, whether you have been told something, whether you have seen something that has made you uncomfortable, **you must share it**. Never assume that someone else will take responsibility for reporting your concern.
- If you don't know what to do, or you yourself need support following a disclosure or difficult conversation, **you must ask for help**. Share your concerns with the Designated Safeguarding Lead.
- The Designated Safeguarding Lead may follow up with you afterwards to debrief, if appropriate.

Section 2: For those in regular contact with Members or other participants

- Before an individual goes into detail, assure them that you will offer support but explain that you must pass any information on if you think they, or others need to be kept safe. This may include reporting the information to the police and/or social services.
- Take a 'non-advice' approach.
- Assure the person you are taking the disclosure seriously.
- Stay calm and try not to show shock or disbelief.
- Listen carefully rather than question directly. You should ONLY ask enough questions to clarify whether there is a safeguarding concern. You may wish to use the acronym 'TED' as a reminder that the individual can be encouraged to Tell, Explain and Describe the concern. If it is necessary to seek further clarification, you should keep to open questions such as What? When? Who? How? Where?
- Stress that disclosing this information has been the right thing to do and that what has happened has not been their fault.
- Do not indicate any judgement towards the perpetrator.

- Empathise, but do not jump to conclusions.
- Discuss with the individual what they can do, what you can do and what you think should happen next and who will be involved.
- Inform your line manager or designated person on the same working day.
- Immediately write down all that has been said to you (see recording below).
- Seek support from your line manager.

Do not

- Press the person for more details or ask probing questions.
- Interrupt someone who is freely recalling significant events as they may not want to tell you again.
- Promise to keep secrets – do explain the information will only be passed to those ‘who need to know’.
- Try to solve the problem with them.
- Give them your opinion.
- Make promises you cannot keep, e.g. ‘this won’t happen again’.
- Contact the alleged abuser.
- Be judgmental e.g. ‘why didn’t you run away?’

Recording

- Make notes as soon as possible after a disclosure has been made. Keep all notes written as these may be requested for court cases in the future. These notes will be kept securely in the Members record file, accessible only by staff with Member support responsibilities and only when strictly necessary by the Deputy DSLs.
- Following this, complete a **Reporting a Safeguarding Concern form** (see Appendix 5) and send to the Designated Safeguarding Lead. The record must be a clear, precise and factual account of the information given to you and/or your observations.
- Use the individual’s actual words wherever possible.

- In cases of visible signs of abuse (bruises/cuts) please draw a diagram indicating the position of any marks on the child or adult.
- Use a pen or a biro, preferably with black ink (for photocopying) – do not use a computer as this cannot be recognised as your personal account
- Write it down as soon as possible after the disclosure – this will ensure as much information as possible is remembered and recorded.
- Sign, date and include the time on the record.

Reporting

The Designated Safeguarding Lead is:

- Jacqueline Stewart (Head of Participation and Deputy CEO and Deputy CEO)

The following staff will deputise in her absence, in this order:

- Anna Herrmann (Artistic Director and Joint CEO)
- Natasha Bucknor (Interim Executive Director and Joint CEO)

*Participation team staff are:

- Tracey Anderson (Support Manager) – Safeguarding Team member
- Sophie Connolly (interim Participation Manager) - Safeguarding Team member
- Koonyin Ho (Admin & Support Worker) – Safeguarding Team member

The key principles to be adhered to in all circumstances are as follows

- Any disclosures or allegations of harm, exploitation, abuse or neglect must be reported to the Designated Safeguarding Lead on duty. Deputies share all reports with the main Designated Safeguard Lead.
- If it is a **safeguarding emergency**, the Designated Safeguarding Lead should contact the Local Authority Adult Social Care Services team for the Borough where the person lives or the Emergency Social Work Team (Out of Hours), if out of office hours. If they are not able to speak to someone, the Police or ambulance services must be called immediately on 999.
- The Local Authority Adult Social Care services contacts can be found <https://www.nhs.uk/service-search/other-services/Local-Authority-Adult-Social-Care/LocationSearch/1918>

- Any evidence must be preserved.
- If the Designated Safeguarding Lead is worried about a child and unsure what to do next, or having difficulty finding help, they should call the NSPCC adult helpline on 0800 800 5000. They will give advice and a reference number you can log.

Disclosure of non-recent abuse

There is no time limit on reporting exploitation and abuse. When an individual discloses that they were previously exploited or abused as a child, you must let the individual know that you will have to pass the information on. Fill out the **safeguarding concern form** (Appendix 5) and give this to the **Designated Safeguarding Lead**.

Concerns about Clean Break staff, volunteers, consultants and artists

If any child, parent/guardian/carer or adult at risk makes a complaint of abuse against a member of staff, the person receiving the complaint **must report it immediately to the Designated Safeguarding Lead** or a member of the Executive Team.

Any member of staff, who has reason to suspect that a colleague has harmed a child or adult at risk or whose behaviour poses a risk of harm, must immediately report their concerns to the Designated Safeguarding Lead within 24 hours.

Safeguarding concerns with a partner organisation

If you are concerned about the safety or wellbeing of an individual or the behaviour of someone from another organisation, you should report this to the organisation's Designated Safeguarding Lead in the first instance. It is their responsibility to respond to the matter.

You should also report it to Clean Break's Designated Safeguarding Lead as they will follow up with the other organisation and make sure action has been taken.

Safeguarding Person 'on call'

For programme and events which occur outside of core hours a risk assessment will be carried out and will contain the name and number of a **Designated Safeguarding person on call**. It may be necessary to train someone outside of the Designated Safeguarding Team to take on this role. If Members are present at the event, where possible a member of the Designated Safeguarding Team will also be in attendance.

Confidentiality

Whatever the nature of the complaint, it must be kept confidential. You must not discuss the disclosure with any individual or party other than those identified in the above procedure.

Appendix 1: Types of harm, exploitation, abuse and neglect

Abuse may consist of a single act or repeated acts. It may be an act of neglect or a failure to act. It may occur when a child or adult is persuaded to enter into a financial or sexual transaction to which they have not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Types of abuse

Physical abuse is deliberate injury to a person, however slight. This may involve hitting, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating or otherwise causing or attempting to cause physical harm to a person. Physical harm may also be caused through the misuse of medication, restraint or inappropriate sanctions or being given alcohol or a substance that is known to cause harm.

Emotional or psychological abuse is the emotional ill treatment of a person that adversely affects their wellbeing or development. Some level of emotional abuse is involved in all types of ill treatment, though it may occur alone. It includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks, being ignored, or not given a choice of who to live or spend time with.

Neglect and acts of omission is the continuing failure to prevent harm that damages or impairs health and/or development by not meeting a person's basic physical and/or psychological needs. This includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, withholding medication, inadequate hygiene, nutrition, housing or heating, or preventing someone from interacting with others.

Sexual abuse is the involvement of a person in sexual activities which they do not want or truly understand, or to which they are unable to give valid or effective consent. This may involve rape, sexual assault, inappropriate sexual contact or exposure to inappropriate material.

Financial or material abuse is the theft or misuse of a person's property or assets. This includes money being withdrawn or stolen, goods or services purchased in someone's name without their consent, being deliberately overcharged for goods or services, misappropriation of property, possessions or benefits, or money being borrowed by someone who is providing a service to the vulnerable person.

Discriminatory abuse is repeated, ongoing or widespread discrimination due to a person's age, sex, gender, disability, racial heritage, religious belief, sexual orientation, appearance or cultural background, marriage or civil partnership, pregnancy and maternity. This can include unfair or less favourable treatment, sexual or gender preference, slurs, harassment, name-calling, breaches of civil liberties, and unequal access to health or social care.

Organisational abuse is the mistreatment, abuse or neglect of children or adults by an organisation or its personnel. It can take place within settings and services that children or adults live in or use, and it violates their dignity, resulting in a lack of respect for their human rights. It can take the form of an organisation failing to respond to or address incidents of poor practice brought to its attention.

Types of Exploitation

Those who want to exploit children and adults will seek out those who are in vulnerable circumstances to use them for their own purpose, activity or gratification. This could be financial, commercial, sexual or related to extremism and terrorism. Exploitation involves a process of grooming.

Grooming is when someone builds an emotional connection with a child or adult to gain their trust for the purpose of exploitation. They may also manipulate their environment, so they become isolated from those who could help or support them. For example, winning the trust of caring and concerned adults, who, as a result, view a situation which should cause concern as acceptable. Grooming can happen online.

Those affected may not realise they have been groomed, or that what has happened is abuse and abusers will try to overcome a child or an adult's natural resistance by:

- making and sustaining contact
- offering gifts or rewards as bribes
- using secrecy and possible threats so that they
- become isolated
- introducing them to abuse that appears natural.

Sexual Exploitation is a type of sexual abuse in which children or adults are sexually exploited for money, power or status. Some children and adults are trafficked into or within the UK for this purpose. They may be tricked into believing they are in a loving, consensual relationship. Abusers will use various means to gain compliance such as drugs, alcohol, gifts, threats and bribes.

Modern Slavery (human trafficking) includes forced labour, domestic servitude or coercing, deceiving and forcing an individual into a life of abuse. People are trafficked for sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. Some people are coerced, but most are trapped in subversive ways. For example, promised education or 'respectable' work in restaurants or as domestic servants, or parents may be persuaded that their children will have a better life elsewhere.

Radicalisation is defined as the process by which those who are vulnerable come to support terrorism or violent extremism and, in some cases, to directly participate in or support terrorist groups. There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas.

The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. It may follow experience of racism or discrimination. They believe that joining a movement offers social and psychological rewards such as adventure, camaraderie and a heightened sense of identity.

Other forms of harm and abuse

Our understanding of abuse continues to develop and there many forms of harm that have a significant effect on safety, health, wellbeing and development of children and adults.

Online abuse

This refers to the internet and other electronic forms of communication such as e-mail, text messages, face-book which can be used to put young people and adults at risk of abuse. There are many ways in which the various forms of technology can be used in a harmful way, including

- **Internet Grooming:** Flattering someone into talking in a private chat room where they will be isolated or befriending someone on a social networking web page. Asking someone what problems they have to create the illusion of being a friend and building up a sense of mutual love and trust, suggesting they can discuss “anything”.
- **Sex talk/Sexting:** Engaging someone in explicit conversations or requesting sexually explicit pictures from them.
- **Cyber –bullying:** Using electronic forms of communication such as e-mail, text, face-book to send malicious or unkind messages to try and intimidate or threaten someone.

Domestic abuse in a relationship is about a pattern of behaviour that one person uses against another to intimidate them and get them to do what they want. Domestic abuse is any incident of threatening behaviour, violence or abuse. Domestic abuse will include emotional, psychological, physical, sexual and financial abuse between those who are or have been intimate partners or family members, regardless of gender, sexuality, age, race, wealth or geography. Domestic abuse is not limited to adults; there is an increasing awareness of domestic violence within teenage relationships.

Harmful Cultural Practices are forms of violence which have been committed primarily against women and girls in some communities and societies for so long that they are considered, or presented by abusers, as part of accepted cultural practice.

- **Female genital mutilation (FGM).** Female genital mutilation (sometimes known as female circumcision or referred to as cutting) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. It is also illegal to take a female out of the country to do this.

- **Forced Marriage.** A forced marriage is where one or both people do not consent to the marriage and pressure or abuse is used. It also applies in cases of people who are mentally incapacitated or have a severe enough learning disability that they cannot consent to marriage. A forced marriage is not the same as an arranged marriage. Forced marriage is illegal in England and Wales.
- **Honour based violence.** Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture.

Bullying can occur between children, adults or between adults and children. Bullying can take many forms. It can be physical, verbal or non-verbal and take place both on and offline. Whatever form the bullying takes, many who are bullied will not tell anyone. Bullying is behaviour that is:

- threatening, aggressive or intimidating
- abusive, insulting or offensive
- cruel or vindictive
- humiliating, degrading or demeaning.

Drug, alcohol and substance misuse is defined as a pattern of habitually taking any substance which can cause harm for mood altering purposes. Substances which can be identified as causing harm may be legal or illegal. It may include shop bought alcohol, over the counter and prescribed drugs and medications being used for unintended purposes and other intoxicating substances such as aerosols and Novel Psychoactive Substances (sometimes referred to as Legal Highs).

Self-harm is the act of deliberately causing harm to oneself either by causing a physical injury or by putting oneself in dangerous situations. Self-harm is primarily a coping strategy and can provide a release from emotional distress and enable an individual to regain feelings of control.

Self-neglect is neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Smacking and Physical Punishment is unlawful in the UK except where this amounts to 'reasonable punishment' The term 'reasonable' is not further defined in law and circumstances such as the age of the child and the nature of the smack would be considered when deciding whether a smack was unlawful. There are, however, strict guidelines about the severity of punishment that can be considered reasonable and where a physical punishment results in wounding, actual bodily harm, or grievous bodily this is physical abuse. It is never legal for a professional or other person providing child care to smack or physically punish them.

Gambling Addiction is when an individual feels a compulsion to gamble that, to others, will seem to be irrational and unadvised. When an individual is addicted to gambling they will often build up significant debts and 'owe favours' to a wide range of people including friends, family members, colleagues and even strangers. They are open to exploitation at the hands of others who may bribe or blackmail them to carry out crimes or take part in sexual acts. Many people gamble online meaning their problem may be harder to spot. People with certain characteristics are more likely to become addicted to gambling including those with impulsive behaviour problems such as ADHD and those who enjoy risk taking behaviours.

Appendix 2: safeguarding considerations in online settings

This Appendix is to highlight some key areas for consideration. Those designing services with digital aspects are strongly recommended to work through the relevant sections of the Digisafe tool <https://digisafe.thecatalyst.org.uk/> once they have read this Appendix.

Use authorised platforms and apps

Make sure you are only using platforms which have been authorised for use by Clean Break, and only use them in accordance with the protocols outlined by Clean Break. A full list of Clean Break's authorised systems and software is included in our Data Protection Policy. If you wish to use another platform or app, this must be reviewed and approved in advance by the Head of Finance & Operations, protocols agreed and the Data Protection Policy updated.

Design for online behaviour

From the Digisafe tool:

“There are some differences between working face-to-face and working online. Online support may create a barrier for some and an enabler for others. Interactions can be quite different. Think about what this means for contact styles, communication and the steps you take to safeguard your users. The best way to do this is to involve them in your decision-making.”

Digisafe provides further information on considerations around:

- The online disinhibition effect
- Lack of facial cues or body language
- Access to technology and confidence to use it
- Anonymity
- Accessing support from home – is home experienced as a sanctuary and safe place, or not?
- Privacy
- Consent
- Security
- Accessibility

[Link: 4. Apply principles - DigiSafe \(thecatalyst.org.uk\)](https://digisafe.thecatalyst.org.uk/)

Safeguarding will be different depending on the kind of online services and devices

- Video based services
- Messaging-based services
- Live chat and chatbot services
- Online groups and forums
- Data and devices used

All content made available online needs careful consideration

For example:

- Language, tone of voice, image selection and useability – is the content accessible and appropriate?
- Anything triggering – how are we handling this?
- Does the content need a quick exit button and crisis contact information?
- Is there any user-generated content?

Document and risk assess all online programme design

- Risk assess all online activities. Consider risks early in the design process
- Provide appropriate guidelines, training and codes of conduct for all involved, including staff.

Personal use of social media

- Remember that managing safeguarding concerns requires thinking beyond working hours and workplace tools and systems.
- Staff and volunteers should be given clear information about how they may or may not connect with Members, past Members and students and other participants on social media. See Boundaries Policy.

Appendix 3: Summary of Training requirements

This is our understanding of the different levels of formal training that may be available, in addition to familiarity with policies, and in-house inductions.

This detail on training levels has been added in April 2022. We will hold training records in the HR system and require that training be refreshed at least once every 3 years.

Level One: introductory level. This sort of training should provide a firm understanding of safeguarding risks.

Level Two: for those who require a high level of safeguarding knowledge, usually for those who have frequent, close contact with children or adults at risk.

Level Three: for those who have a central role in any safeguarding situation. They are usually the first point of contact i.e the Designated Safeguarding Lead.

Trustees	<p>Must read this policy, confirm they have read and understood it, and approve any updates</p> <p>Encourage all Trustees to undertake Level One training.</p> <p>Aim to have at least two Trustees with Level Two training or above who can advise the board as necessary</p>
Executive Team	Level Two training
Designated Safeguarding Lead	Level Three training
Designated Safeguarding Team deputies	Level Two training
Designated Safeguard Team other staff	Level Two training
Staff or volunteers working 1 to 1 with adults at risk	Level Two training
Staff or volunteers with regular contact with adults at risk (not 1 to 1) – e.g. lead artists in workshop settings and volunteers supporting them	<p>Minimum of a thorough induction into Clean Break’s policy and practice by a Designated Safeguarding Team staff member</p> <p>Level One training highly recommended</p>
Staff or volunteers designing or managing projects or programmes	Minimum of a thorough induction into Clean Break’s policy and practice by the DSL or one of her two deputies

	<p>Clear signposting to relevant tools and resources for safe programme / project design e.g. Digisafe</p> <p>Level One training highly recommended</p>
All other staff or volunteers	<p>Must read this policy and confirm they have read and understood it</p> <p>Must have a safeguarding induction session with by a Designated Safeguarding Team staff member.</p> <p>To be completed within first three months of employment / engagement.</p>

Appendix 4: Annual report to the Board of Trustees

The following information should be included in an annual safeguarding report to the board of trustees. This list was compiled with reference to guidance from NCVO.

Where numbers are provided, the previous year's figures should also be included for comparison wherever possible.

- Names of Designated Safeguarding Lead and deputies
- Number of safeguarding concerns raised since the last report
- Number of referrals made to statutory services
- Nature of concerns raised – e.g. the categories of abuse – and the projects or services relevant to these concerns
- Number of allegations against staff and volunteers
- Training record of staff and volunteers at all levels
- Safer recruitment updates relating to staff and volunteers (with input from Executive Director)
- Any recommendations made or changes identified following investigations
- Any plans for updates to any relevant policies
- Impact of any new safeguarding related legislation or guidance on Clean Break's policies and practice
- Any other feedback which is needed to enable trustees to fulfil their safeguarding governance roles

Appendix 5: Reporting a safeguarding concern form (internal)

This form should be completed by staff in regular contact with Members or other participants and sent to the Designated Safeguarding Lead on duty when reporting any safeguarding concern.

This is a copy of the form. The form should be completed on Microsoft Forms. It is held securely and only available to the Designated Safeguarding Lead and her deputies.

Date of concern:	Date and Time (of writing):	
Name of person reporting:	Position:	
Name of person you are concerned about (if known):		
Date of Birth (if known):		
Address or area of residence (if known):		
Has the person given consent for you to share information outside of Clean Break?	YES	NO
If a young person, does the parent/carer know about concern?	YES	NO
Is the person you are concerned about involved with Clean Break? <i>(Member, volunteer, staff member, Trustee, consultant)</i>	YES	NO
Brief overview of the concern		
<i>Record the following factually: What were you worried about? Who was involved? What happened? Where? When? Any witnesses?</i>		
Background to the concern		
<i>Is there anything you have observed or know about the situation that might help in understanding the concerns?</i>		
Action taken.		
<i>What action has already been taken? Include names of anyone who has been involved or helped, including emergency services or other organisations.</i>		
Impact on you.		
<i>What is the impact of this situation on you? Do you need any additional support?</i>		
<i>Signed by:</i>		

Appendix 6: Referring a safeguarding concern to Camden Council

This form / emergency number is for use by the Designated Safeguarding Lead or her deputies only, for referring safeguarding concerns to Clean Break's local borough Camden Council when appropriate.

Camden Safeguarding Adults Partnership Board Multi-agency Safeguarding Adults Referral Form

**THIS FORM IS NOT TO BE USED BY MEMBERS OF THE PUBLIC.
MEMBERS OF THE PUBLIC SHOULD PHONE 020 7974 4000
AND THEN PRESS OPTION 1.**

Use this form to refer any incident or suspicion of harm.

**If outside normal office hours or at the weekend
or on a Bank Holiday, please contact
OUT OF HOURS EMERGENCY DUTY TEAM on 020 7974 4444.**

**Where a criminal act may have been committed, the police must be
notified immediately on 101 (non-urgent) or 999 (urgent).**



Section 1: DETAILS OF ADULT AT RISK

NAME		DOB	
AGE <i>(if DOB is unknown)</i>		GENDER	
ADDRESS		TEL NO	
DETAILS OF NEXT OF KIN/OTHER CONTACT			
HAS THE ADULT AT RISK PROVIDED CONSENT FOR THIS CONCERN TO BE RAISED?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>If no, please state reason(s).</i>	
DO YOU THINK THE ADULT AT RISK HAS MENTAL CAPACITY IN RELATION TO MAKING DECISIONS ABOUT THEIR SAFETY?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Please provide further details if available.</i>	
	<i>Is there a suitable person who could represent them? (e.g. family member, friend, advocate)</i> <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, please provide details.</i>	<i>Has a mental capacity assessment been undertaken?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No <i>Please provide details.</i>	
DO YOU THINK THE ADULT AT RISK WOULD HAVE SUBSTANTIAL DIFFICULTY IN PARTICIPATING IN THE SAFEGUARDING ENQUIRY PROCESS?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>If yes, please provide details.</i>	
HAS THE ADULT AT RISK'S FAMILY BEEN INFORMED OF THE CONCERNS (WHERE THE ADULT HAS CONSENTED TO THIS)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Please provide details.</i>	

SERVICE USER GROUP		Service User Sub-group	
ETHNICITY			
FIRST LANGUAGE	<i>Detail communication needs.</i>		
NHS NUMBER <i>(If known)</i>			

Section 2: CONCERN	
BRIEF FACTUAL OUTLINE OF CONCERN	
DATE OF CONCERN	
LOCATION OF INCIDENT	
TYPE(S) OF ABUSE – PLEASE SPECIFY	
ARE THERE ANY CHILDREN INVOLVED?	<input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, please refer to Children's MASH by email LBCMASHAdmin@camden.gov.uk or telephone 020 7974 3317</i>
TYPE OF INCIDENT	
	<i>If self-neglect please skip to Section 4</i>

Section 3: PERSON/ORGANISATION ALLEGED TO HAVE CAUSED HARM (PACH)							
NAME		DOB		AGE <i>(if DOB is unknown)</i>		GENDER	
ADDRESS							
TELEPHONE NO							
<i>If professional/volunteer, please specify</i>				<i>If other, please specify</i>			
Was alleged PACH living with the adult at time of abuse?	<input type="checkbox"/> Yes	<input type="checkbox"/> No		<i>Still living with adult?</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

If the allegation is of organisational abuse, please name the provider:			
PLEASE GIVE DETAILS OF IMMEDIATE ACTION TAKEN TO TRY AND REDUCE RISKS:			
SECTION 4: ORGANISATIONS INVOLVED			
<i>NAME</i>	<i>JOB TITLE</i>	<i>ORGANISATION (SOCIAL SERVICES, CQC, POLICE, GP)</i>	<i>CONTACT DETAILS PHONE NUMBER EMAIL ADDRESS</i>
HAVE THE POLICE BEEN NOTIFIED?	<input type="checkbox"/> Yes <input type="checkbox"/> No	CRIME REFERENCE NO	
PROVIDE DETAILS IF MEDICAL ATTENTION GIVEN:		NAME OF HOSPITAL/DOCTOR	

SECTION 5: REFERRER DETAILS				
CONCERN REPORTED BY:	Service user	<input type="checkbox"/>	Friend	<input type="checkbox"/>
	Relative	<input type="checkbox"/>	Paid carer	<input type="checkbox"/>
	Social Worker	<input type="checkbox"/>	Stranger	<input type="checkbox"/>
	GP	<input type="checkbox"/>	Nurse	<input type="checkbox"/>
	Hospital Doctor / Staff	<input type="checkbox"/>	Therapist	<input type="checkbox"/>
	Provider or Voluntary Organisation (please specify)			

	Other (please specify)		
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SECTION 6: DESIRED OUTCOMES	
DESIRED OUTCOME(S) OF ADULT AT RISK	
DESIRED OUTCOME(S) OF REFERRER	

DETAILS OF THE PERSON COMPLETING THIS FORM			
<i>NAME</i>	<i>JOB TITLE</i>	<i>TELEPHONE NUMBER</i>	<i>EMAIL</i>

Once the Adult MASH team have received your referral form by email, you will receive confirmation that the Concern is being screened.

If further information is required, you may be contacted by a MASH social worker.

Please note that this form is to be sent to
asc.mash.safeguarding@camden.gov.uk.

More details on Camden's Safeguarding Policy can be found here: www.camden.gov.uk