



Trailblazers Mentoring Safeguarding Policy & Procedures

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1. Policy Framework

1.1 Purpose and Commitment

Trailblazers provides mentoring to young offenders aged over 18 with the primary objective of reducing their reoffending. We offer weekly one to one mentoring sessions both inside prisons and after release and through guidance, encouragement and support we seek to inspire our mentees to change their future and make a positive impact on their communities.

The welfare and safety needs of our people is paramount. We are committed to ensuring that young people, adults at risk and children, as well as our volunteers, staff, trustees (including Fellow, Ambassadors and Development Board members) and partners are safe and that their wellbeing is promoted. We believe that abuse is unacceptable and we are committed to preventing any form of abuse and neglect. We recognise that safeguarding is everyone's responsibility. All safeguarding concerns will be taken seriously and responded to appropriately and in line with this policy and procedures – this includes working closely with prison establishments where necessary.

Whilst we only work with adults aged over 18 years, we recognise the importance of thinking broadly about how safeguarding concerns may become apparent. This includes the 'think family' approach which considers safeguarding concerns for the children of the mentees we work with as well as recognising that many of our mentees will have experienced harm in their childhoods. It is important that we are aware of the potential need for us to recognise and respond to children's safeguarding matters and therefore Appendix 6 sets out the context for children's safeguarding.

We have a board of trustees and a CEO who lead our organisation. This policy and procedure is approved by the board of trustees.

The aim of the policy is to promote an environment where we work together to listen and respond to safeguarding concerns, where mentees can use our services safely and mentoring is undertaken by staff and volunteers who are informed and confident about safeguarding matters. We strive to meet our responsibilities to provide systems and processes to manage safeguarding in line with our legal obligations including training, multi-agency working and this policy and procedures to help identify and manage safeguarding concerns.

We will review and update this safeguarding policy and procedure at least annually and more frequently in light of significant changes in law, guidance or practice requirements. We will make this policy and procedure available to staff and volunteers and ensure that mentees are informed of it. We will make it available to others who have an interest in our services.

1.2 Scope

This policy and procedure applies to everyone working for or with Trailblazers, including trustees, paid staff, volunteers and contractors. Hereafter all will be called 'staff' in this policy and procedure.

When there are updates to the policy and procedure, they will be re-issued to staff and made available on the organisation network, Sharepoint. It is expected that the policy and procedure is read, understood and applied by all staff.

1.3 Equality and Diversity

The welfare of all of our mentees is paramount and all have a right to equal protection from harm or abuse, regardless of gender, ethnicity, disability, sexuality, marital status, gender reassignment, age, pregnancy (maternity), beliefs or any other difference.

1.4 Legislation and Guidance

This safeguarding policy and procedure is underpinned by law and statutory guidance and includes:

Human Rights Act 1998
The Equality Act 2010
Care Act 2014
Care & Support Statutory Guidance 2020
Mental Capacity Act 2005 / Mental Capacity (Amendment) Act 2019
Safeguarding Vulnerable Groups Act 2006
Protection of Freedoms Act 2012
Sexual Offences Act 2003
Modern Slavery 2015
Female Genital Mutilation Act 2003
Anti-Social Behaviour, Crime and Policing Act 2014 (forced marriage)
Domestic Abuse Act 2021
Counter Terrorism and Security Act 2015
Serious Crime Act 2015
Data Protection Act 2018 (UK GDPR)
Charity Commission Safeguarding Guidance 2019

1.5 Relationship to Other Policies and Procedures

This policy and procedure relates and works alongside other Trailblazers policies and procedures to safeguard the organisation. They should be read in conjunction with this policy and procedure and include:

Handbook (contains various policies, codes and guidance documents)
Business Code of Ethics
Code of Conduct
Equality, Diversity and Inclusion
Learning and Development
Health and Safety Policy
Lone Working
Staying Covid Secure
Data Protection
Information Security Policy
Social Media Policy
Safer Recruitment
Grievance and Whistleblowing
Quality Assurance
Complaints Policy
Modern Day Slavery Statement
Complaints Proce
Mentoring Risk Assessments (prison and community)

2. Identifying Abuse and Neglect for Adults at Risk

2.1 Defining ‘safeguarding’

Safeguarding adults covers several aspects including:

- protecting people from abuse, neglect and harm
- preventing impairment of their health or development
- optimising their well-being, voice, choice and control
- ensuring the provision of safe and effective care, provision of effective policies, procedures,

systems and training, and promoting a culture of vigilance and responding to concerns.

2.2 Defining an 'adult at risk'

Safeguarding adults applies to a person who is an 'adult at risk', this is defined as someone who is aged 18 years and over who:

- has care or support needs (whether or not these needs are being met), and
- is experiencing, or at risk of, abuse or neglect, and
- as a result of those care and support needs, is unable to protect themselves from abuse or neglect.

An adult may be in need of care and support and struggle to protect themselves from harm for a variety of reasons, including physical, sensory or learning disability, mental health difficulties, medical conditions, dementia, brain injury, age and infirmity.

2.3 Six principles in adult safeguarding

The Care Act (2014) sets out the legal framework about how we should work to protect adults who may be at risk of abuse and neglect. The principles as set out in the Act, along with what this may mean for practice are:

- Empowerment – We empower adults to make their own decisions by providing them with support, advice and guidance to make informed choices.
- Prevention – Guidance is in place to ensure people know how to recognise abuse and how to seek help and to take action before harm occurs.
- Proportionality – Our response is based on balancing risk to provide the least intrusive response necessary whilst ensuring all risks are addressed.
- Protection – We provide advice and guidance about keeping safe and signpost or refer to relevant agencies.
- Partnership - We work together with multi-agencies to provide holistic oversight and effective support whilst ensuring confidentiality is maintained.
- Accountability – We are clear about the roles and responsibility of all those involved in safeguarding. We deliver a transparent service that provides a robust and effective safeguarding policy and procedure.

2.4 What is abuse and neglect?

Abuse and neglect is a violation of an individual's human and civil rights by any other person or persons. It can be:

- single or repeated acts.
- intentional or unintentional.
- adults participating in situations when they have not given their informed consent or when they do not have capacity to consent
- acts which are also crimes.
- behaviours which in isolation may be minor, but which over time can cause a great deal of harm.
- happen anywhere, e.g. in someone's home, a public place, a care setting or a community setting. It can take place wholly online, or technology may be used to facilitate offline abuse.

2.5 Who Abuses and Neglects Adults at Risk?

Anyone can perpetrate abuse or neglect, including:

- Family members including parents, brothers, sisters, spouses/partners and children
- neighbours, friends, acquaintances
- local residents, community mentees, strangers
- paid staff, professionals and volunteers, carers

Abuse can be perpetrated by one person or by several people. It is more likely that the abuser is known and may be in a position of trust and power, than for the abuser to be a stranger.

2.6 Particular Vulnerabilities

Some adults and children may be more likely to be targeted to be exploited, abused or neglected due to characteristics that make them more vulnerable. Listed here are some such circumstances but it should be noted that this is a complex area and not all vulnerabilities inevitably translate into harm.

Disability

People with disabilities are additionally vulnerable because they may:

- have signs of abuse/neglect which are misinterpreted as being due to the disability
- have impaired capacity to resist or avoid abuse
- have difficulties communicating to others what is happening
- have fewer outside contacts than other people
- receive care from several carers which increases exposure to abusive behaviour
- receive personal care which makes it more difficult to maintain physical boundaries
- fear making a complaint in case they lose services or aggravate their carers

People who have Previously Been Looked After Children & Care Leavers

People who have experienced abuse, neglect and family breakdown such that they have spent parts of their childhood in foster care or residential care may be particularly vulnerable. Many people who have experienced being in care may have poorer outcomes in terms of education, employment or health care needs – both physical and psychological - being met.

Race and Racism

People from black and minority ethnic groups may have experienced harassment, racial discrimination and institutional racism. Experiences such as these are likely to have a cumulative impact on their sense of identity and self-worth, limit their opportunities or serve to isolate from communities and sources of support. There is also a potential dynamic whereby professionals may not intervene soon enough in safeguarding matters (e.g. for fear of being seen as racist or in the mistaken belief that certain behaviours are acceptable in black families which would not be in white families) and in so doing, offer fewer safeguards.

Contextual Safeguarding

This refers to harm that people can experience from outside of their families. The environment and relationships that people form in their neighbourhoods, schools and online can feature violence and abuse and so there may be vulnerability to harm in social contexts.

Adolescents particularly may be affected as they begin to spend more time, independently of their families, outside the home. Their social environment may lead them to encounter either forms of protection or forms of abuse and exploitation. Examples such as street robbery; sexual violence in parks; gang-related violence; online bullying; harassment from peers and abuse in their intimate

relationships, show that young people can be exposed to significant harm in settings outside their families. Parents/carers may have little influence over these extra-familial contexts and so may not be able to promote their safety and well-being. Equally, young people who are exposed to harm at home may avoid going home and therefore be exposed to crime or exploitation outside home, or they may adopt the harmful behaviour they are exposed to, as a behaviour toward others.

Please refer to Appendix 7, Types of Abuse and Neglect & Recognising Signs.

3 How Safeguarding Concerns May Arise at Trailblazers

Safeguarding concerns may come up in various ways in our work and below are some examples relating to safeguarding issues about our mentees and others including staff.

- A mentee tells you they are currently experiencing abuse.
- A mentee tells you of previous abuse they experienced and say that they have never told anyone else before.
- Someone else tells you that a mentee has experienced abuse.
- A mentee tells you they were abused when they were a child and that their abuser currently has access to children
- You notice a mentee seems low in mood and has some bruising.
- A mentee has children, and is struggling to cope (eg mental health difficulties) and you worry about how they may care for the child.
- A mentee tells you that their mum is subject to serious domestic abuse. You understand that their mum also lives with a small child.
- A mentee tells you they have harmed a child or another adult.
- A mentee tells you that a staff member is making them feel uncomfortable, for example they are connecting on social media with them, giving them lifts, taking them out outside of work hours.
- You observe a mentee bullying another service user.
- You observe that the behaviour of staff to the mentees is harsh.
- A member of staff tells you they borrowed money from a mentee.

4 Roles and Responsibilities at Trailblazers

4.1 Everybody

Everyone working at or for Trailblazers is responsible for safeguarding. All of us need to:

- read and apply this safeguarding policy and procedure
- be aware of our position of trust and our duty to our mentees
- be alert to potential signs of abuse or neglect and to possible risk posed by people.
- respond to any safeguarding concerns, however small they may appear.
- attend safeguarding learning and development opportunities

4.2 Designated Safeguarding Officers

The DSO's are Project Managers and they have operational responsibilities for safeguarding at Trailblazers which are:

- promoting a safeguarding and listening culture across Trailblazers.
- keeping up to date with safeguarding including the local multi-agency arrangements.
- being available to staff and providing advice and support on safeguarding to them
- managing individual safeguarding cases including making decisions and taking actions, seeking specialist advice, reporting to police or social care when necessary, working with other agencies, escalating concerns if required and managing record keeping.
- alerting the Designated Safeguarding Lead (DSL) to any safeguarding concerns relating to allegations against staff; poor practice concerns, staff training needs or any other matters related to the management of safeguarding.
- contributing to the safeguarding work, e.g. policy development, data collection, safer recruitment, induction and training of staff.

4.3 Designated Safeguarding Lead (DSL)

The DSL is the Chief Executive Officer who has strategic responsibilities for safeguarding at Trailblazers. The DSL may delegate aspects of the role to the Service Delivery Director (SDD). The DSL role includes:

- promoting a safeguarding culture and keeping up to date with safeguarding matters.
- setting the safeguarding policy and procedure, ensuring annual reviews are undertaken and taking responsibility for its implementation and monitoring the effectiveness.
- Implementing related policies, codes and procedures such as the code of conduct, safer recruitment, disciplinary and whistleblowing policies.
- ensuring effective safeguarding systems are in place, including secure recording, recruitment processes, appointing DSO's and safeguarding training.
- assisting and overseeing the work of the DSO's and quality assuring management of safeguarding cases, including decisions made.
- overseeing the management of safeguarding allegations against staff.
- briefing Trustees about safeguarding activity (data, gaps, themes and risks), maintaining a risk register and providing an annual report on safeguarding.

4.4 Trustees

The Trustees are ultimately responsible for the governance of safeguarding at Trailblazers, ensuring that the organisation is legally compliant and delivering services safely. Their responsibilities include ensuring:

- a culture of safeguarding is promoted and staff and everyone Trailblazers has a direct responsibility to safeguard eg mentors, staff, Trustees) can raise concerns.

- a safeguarding policy and procedure is in place which is annually reviewed, available to and applied by all
- there are policies and systems in place to promote safeguarding including code of conduct, whistleblowing and safer recruitment policies.
- safeguarding concerns are managed effectively; systems are in place for its management; there is sufficient resourcing of safeguarding including for training; DSL and DSO roles are appointed.
- a Lead Safeguarding Trustee is nominated who maintains regular contact with the DSL
- they receive and review regular feedback on safeguarding activity (such as gaps, threats, risks), oversee a risk register and ensure remedial actions are taken and progress tracked.
- Trustee Chair (or Deputy Chair) makes enquiries in the event of an allegation being made against the CEO.
- compliance with the Charity Commission serious incident notification requirements, and other relevant bodies such as regulators, commissioners, grant-makers, insurance companies.

5. Responding to Safeguarding Concerns

5.1 Barriers to Speaking out and Listening

Mentees may be reluctant to tell about their experiences of abuse and neglect. The reasons are complex, but explain why there are often delays in people coming forward and why some people never tell. Reasons may include that they:

- do not have anyone that they can turn to or that they can trust
- may have sought help before but felt let down
- fear not being believed or be taken seriously
- feel shame, guilt, or responsibility for the abuse
- feel embarrassed about talk to someone about what happened
- fear the consequences of telling, fear the situation could become worse
- believe they are protecting others (e.g. the abuser, family members)
- have been groomed not to tell, are frightened because they have been threatened.
- the abuse or neglect is all they have known and they have accepted it as a norm.
- lack language skills, e.g. because they are pre-verbal, have communication impairment or don't speak English fluently

Staff may be reluctant to hear disclosures of abuse and neglect due to:

- Not understanding or not recognising the signs and indicators
- Believing that what has happened is alright and not a problem
- Not believing the abuse or neglect has happened
- Thinking the issue will resolve itself or that it is a one-off
- Not knowing how to react
- Feeling overwhelmed
- Not knowing who to tell
- Loyalty to the person who is accused
- Fear actual or perceived threats from the abuser.
- Fear getting it wrong or to make things worse by intervening
- Worrying about breaching confidentiality or are persuaded not to share the information
- Lack of knowledge or trust in the multi-agency safeguarding system
- Not wanting to be involved
- Believing someone else will or should deal with the matter.

It is essential that we do not allow these barriers to influence us and that we take action, seek advice contribute to Trailblazers being a safe and listening organisation.

5.2 Responding to Safeguarding Concerns

Safeguarding concerns may arise when:

- someone says they have previously experienced or are currently experiencing harm
- a third party says that someone has been, is being or is at risk of being harmed
- signs are observed which indicate safeguarding concerns
- you witness an incident or event that raises a safeguarding alert.

Often a mentee will approach someone that they trust or because they are available and supportive. It is important to be clear about our boundaries if someone tells us about abuse or neglect. The matter may need to be reported to another agency and there may be criminal or safeguarding inquiries that commence. What we say and do at an early stage when abuse and neglect is

suspected may be scrutinised later on, so it is important that this conversation is managed properly. We are not responsible for undertaking investigations into allegations of abuse and we are not expected to make enquiries or begin detailed questioning.

The list below advises about how to manage situations when a person talks to us about their experience of abuse or neglect.

- Make time and space to listen carefully and understand what is being said.
- Take the matter seriously and reassure the person that they are right to tell you/someone.
- Actively listen without interruption and allow the person to say what they recall.
- Stay calm, remain neutral and don't react with strong feelings like shock, anger, denial.
- Respond naturally, with compassion and empathy.
- If you need to ask questions, use open questions, such as those starting 'who', 'when', 'where', 'how'. Avoid asking 'why' questions. Questions such as 'tell me more about that' are open questions which help people to speak using their own words.
- Do not ask leading questions, these are questions that presume the answer.
- Don't push for more information that the person is willing to give or continue the discussion if the person is reluctant. Don't interrupt the person when they are talking freely.
- Ask them to repeat their account.
- Adapt your language so you communicate with the person effectively. Summarise using the person's own words.
- Do not speculate or blame anyone.
- Say you know how they feel, or what you think they should have done instead.
- Never ask to look at injuries, especially if it entails them lifting/removing clothing.
- Don't begin to make enquiries or start investigations.
- Don't confront the alleged perpetrator.
- Never promise confidentiality or make other promises such as 'it will all be okay now'.
- Ask the person what they would like to happen.
- Explain what will happen next, who you will tell, that you have guidelines to follow.
- Try to preserve evidence if a crime may have been committed, e.g. clothing, footwear.
- Close the conversation when you have enough information to know what action is needed.
- Consult immediately with Designated Safeguarding Officer.
- Record the conversation immediately on the Safeguarding Concern Form (see Appendix 3).

It is important to keep an open mind about what you see and hear. Take the matter seriously: it is not for staff to judge the reliability of a safeguarding allegation, that is for the local authority and police to decide after investigation. Remember that reporting concerns is not a betrayal of trust, we have a duty to report.

5.3 Information Sharing, Consent to Share & Mental Capacity

When sharing information about mentees with external agencies, the law on confidentiality and information sharing must be applied. Service users have a right to expect that their personal information is not shared with other agencies and that their consent is obtained before sharing and that they are asked what they would like to happen about what they have shared. We should aim to seek consent from mentees about sharing their information and doing this is more likely to lead to engagement and promote an effective working relationship with the individual.

There are exceptions to this and the law does not prevent the sharing of information without consent in certain circumstances such as:

- there is a genuine emergency whereby life is at risk
- it is in the public interest, e.g. a serious crime has been or may be committed
- the individual has experienced serious abuse and the level of risk to them is high

- the individual would be put at further risk, be threatened or otherwise coerced into silence
- other people are at risk, including children or other adults at risk
- where seeking consent could place them or others at risk, including risk to a child
- the person at risk lacks capacity (see 'Mental Capacity' below) to consent or make decisions
- the alleged abuser is an adult at risk and needs support
- the risk is being posed by paid carers or professionals
- the concerns relate to a failure in care, breach of regulation or professional code of conduct.

In these instances, confidentiality is not offered absolutely and we have a duty to make reports and share information. It is therefore important that we do not give assurances of confidentiality regarding disclosures.

When seeking to share information, it is good practice to speak with the mentee to:

- explain why information needs to be shared and with whom
- check that factual information is accurate and up-to-date
- clarify how the information will be used and what information will be passed on
- specify how it will be shared and how it will be stored securely
- outline the implications of not giving consent
- explain next steps.

The safety and welfare of the mentee and others is the paramount consideration in making any decisions whether to seek consent prior to making a report. The DSO must be involved in any decision about the appropriateness of seeking consent and the DSO can seek advice from Social Care without disclosing the identity of the person.

Social Care should be informed when making a referral:

- whether consent has been sought, given or withheld but overridden
- who was contacted to obtain consent, their response, wishes and desired outcomes
- if consent was refused, that the adult at risk has still been informed of the report
- if no attempts have been made to seek consent, why.

Where information is shared – with or without consent - what is shared must be only that which is necessary, proportionate, relevant, adequate, accurate, timely and then it is shared securely.

If information is not shared because consent was not given and it is judged that it cannot be shared, advice, signposting and guidance can be offered to support the mentee. Further opportunities to discuss matters, including concerns about safeguarding and to share information in future should be given.

A record of the decision about sharing information must be kept which includes the reasons for the decision. If information has been shared, record what has been shared, with whom and for what purpose. If a mentee's consent to share information is overridden, this must be recorded.

The Social Care Institute for Excellence (SCIE) has produced a detailed guide called Safeguarding Adults: sharing information (2019) which is available here:

<https://www.scie.org.uk/safeguarding/adults/practice/sharing-information>

Mental Capacity

Mental capacity is a concept set out in The Mental Capacity Act 2005. It refers to the ability of a person at a point in time to understand, retain, use and communicate information to make an informed decision on a specific issue and understand the consequences.

Adults are presumed to have mental capacity until it has been assessed that they do not. Presumption of mental capacity also means that adults can make what may be seen as 'unwise' decisions. Anything done for, or on behalf of, a person who lacks mental capacity must be in their 'best interests' and the 'least restrictive' of their rights and freedoms.

Adults have right to make their own decisions and this may involve giving them information about options available to them so they are able to make decisions that are right for them. This principle does not undermine our responsibility to alert other agencies where we are required to do so. Where the adult at risk does not have the mental capacity we are required to take decisions necessary to safeguard them and actions must be in their best interests.

5.4 Recording

Recording is a key task in safeguarding and it includes recording concerns, allegations, decisions, actions and reasoning. Records may be used in future legal proceedings and be accessed by other parties as well as the individual concerned. Record keeping and storage must be in accordance with Data Protection Policy.

The following good practice checklist should be followed for making safeguarding records.
Records:

- can be made during the session or afterwards but must be completed within 24 hours.
- should describe the circumstances in which the disclosure came about, who was present
- as far as possible, should use the person's own words and phrases.
- should be objective and differentiate between fact, professional opinion, observations, hearsay and third-party information.
- must be legible, in plain language and free from jargon. Acronyms or initials should not be used unless they are properly explained
- should be clear, accurate, concise and up to date.
- must state the date, time, place and who was present.
- should be typed but can be handwritten in black ink to allow photocopying and be legible
- must state the reason's for the decisions made, including decisions to take no further action.
- state what actions are to be taken, and by whom.
- should be made only on Trailblazers systems and be held by Trailblazers. Records should never be kept at home or in places outside of Trailblazers, or be made on personal equipment such as phones or records.
- the report must be signed, dated and timed.
- be accessed only by those who are authorised and on a need-to-know basis.
- must never be amended. Additional information or corrections of fact must be written as a separate record and explaining why the additional note is being made.

Records must be retained securely on the file of the mentee as per the Data Protection Policy.

6. Safeguarding Supervision and Support for Staff

Trailblazers is committed to supporting staff and we recognise that our work can be challenging in many ways.

All staff receive supervision and safeguarding is a key part of supervision. Staff are encouraged to discuss any safeguarding concerns with their supervisors, whether that is formal supervisory meetings or ad-hoc. Supervision notes in relation to a case will be transferred to the individual's case file. Supervision notes will be kept in the staff members personnel file but will be recorded in such a way as to prevent identification of the mentee.

Safeguarding is also part of staff appraisal and will be a part of the agenda at departmental, staff or volunteer meetings. This is to ensure that everyone is kept informed about safeguarding issues, that learning needs are identified, that we remain vigilant about concerns and workplace practices, that the impact of safeguarding work, including possible distress is managed and that we collectively work to create a safeguarding culture in our organisation.

Staff can also approach the DSO in relation to safeguarding matters.

Supervision, and debriefing is available and will be provided after safeguarding incidents or events, including attendance at multi-agency meetings.

DSO's will be offered support in relation to their responsibilities.

Any staff member who has been involved in reporting a concern should be offered the opportunity to talk over their experience with their supervisor.

The DSL will ensure that if there have been allegations against staff, that colleagues who have been involved in the issues surrounding the allegation are supported, supervised and effectively debriefed.

In some circumstances a learning review may take place after a safeguarding concern, to learn lessons and improve practices, amend policies and procedures or lead to staff training. This policy and procedure, or other policies may need to be reviewed in relation to the learning.

7. Learning and Development Plan

All staff should receive training and development to help them fulfil their role.

Everyone should be equipped with the knowledge and skills to recognise the possible signs of abuse, neglect, exploitation and radicalisation and to know what to do if they have a concern. Everyone should be familiar with this policy and procedure and be able to apply it when required.

Designated Safeguarding Officer's and the Designated Safeguarding Lead and Trustees must be able to undertake their specific responsibilities supported by training.

Trailblazers offer the safeguarding learning opportunities listed below offered through training, briefings, online, reading etc. Records will be kept of attendance and reviewed.

Induction

Everyone (staff, volunteers, trustees) when starting work at Trailblazers will receive safeguarding induction, this safeguarding policy and procedure and Code of Conduct. They are expected to read it and to agree to apply it as required.

Safeguarding learning and development / training

Everyone will receive, within 6 months of joining the organisation, introductory safeguarding learning and development which will help them to identify abuse and neglect and report it using this policy and procedure and statutory guidance. This training will then take place annually as a refresher/update. Everyone will be expected to attend.

Safeguarding matters, including updates to law, policy and procedures or particular aspects of safeguarding will be discussed at team meetings regularly and additional learning opportunities may also be available to staff.

Safeguarding training for Designated Safeguarding Staff

The DSO's and the DSL will receive training within 6 months of their role commencing and then refresher/update briefings every two years. This will focus on managing safeguarding including making decisions, making referrals and reports, contributing to the inter-agency process, consent, confidentiality and information sharing and staff support.

Specialist Safeguarding Training for Designated Safeguarding Leads & Trustee's

Those roles that undertake recruitment will need to have undertaken 'safer recruitment' training. In addition, those senior staff and Trustees who may be required to manage allegations against staff will be required to have training in this area.

Safeguarding Governance briefings

Trustees will receive training to be able to fulfil their safeguarding governance responsibilities. This should take place for all Trustee's and be updated every two years.

A. Managing Safeguarding Concerns Procedure

If you are concerned about a safeguarding matter, however small it may seem, speak with a DSO. Usually an initial conversation with a DSO will help to clarify matters and put in plans for support. Remember not every concern will result in a safeguarding referral needing to be made.

Where there are serious concerns, it is not the responsibility of anyone at Trailblazers to decide if anyone has been abused, but we are responsible for responding to and reporting concerns. However safeguarding concerns emerge, it is important we act on them and report them. Reports must be made immediately or as soon as possible after the concern comes to light and within 24 hours. It should not be assumed that someone else will make the report or that where mentees are detained, prisons are already aware and dealing with the issue. Safeguarding reports must be made to the local authority social care department where the safeguarding concern is thought to have occurred. If it is not clear which local authority to report, the local social services should be contacted for advice. Outside of office hours, the local authority emergency duty team should be contacted if a child or adult is at risk.

Where you are working with a mentee who is in a secure estate, you should be aware at the outset of the prison's safeguarding policy, the names and contact details of the prison's Designated Safeguarding Officer/s, and the reporting process used in the prison. This is so that there is no delay in addressing safeguarding concerns should they arise.

See Appendix 1 for all contact details of safeguarding staff at Trailblazers; Appendix 2 for contact details of external agencies, Appendix 3 for the safeguarding concern form and Appendices 4 and 5 for flowcharts which simplify the process for managing concerns.

A1. Responding to a safeguarding emergency

If emergency support is needed, for example where a mentee has been seriously hurt, is at immediate risk of abuse and delay could increase this risk, is in danger or a criminal offence against them has occurred, you should:

- i. take any immediate action to protect the person from abuse and prevent harm to them or others. This should be done without putting yourself in danger.
- ii. inform a DSO and ring the emergency services. If you are working with a mentee in a secure setting, alert the prison's DSO to contact the emergency services.

Then follow the procedure set out below in the paragraph 'responding to a safeguarding concern'

A2. Responding to safeguarding concerns when mentees are in prison (non-emergencies)

Where a mentee is in prison, the safeguarding procedure of the prison must be used. This means that the prison and the prison's DSO will be responsible for managing any safeguarding concerns. Our duty is to alert the prison's DSO, let the mentee know we have done so and record. Where we are concerned that the prison is not acting on a safeguarding matter when we consider that they should, we have a duty to follow this up.

Follow these steps:

Stage 1: Speak to the prison's DSO about your concern, however minor it may seem. This should be done on the same day that you identify the concern or immediately afterwards. Let the mentee know that you will inform the prison's DSO.

Stage 2: Record all relevant details on Trailblazers safeguarding concern form (Appendix 3) and forward this to the Trailblazers DSO. The Trailblazers DSO will oversee and support the mentor with any follow up.

Stage 3: The prison's DSO, having clarified the concerns and understood the relevant background, will make decisions about the next steps to take. In so doing, the DSO may:

- seek advice or information from others either at Trailblazers or external agencies.
- speak with the mentee and obtain their view of what they would like to happen and tell them of their duty to pass on our concerns if this is required.
- clarify matters regarding consent to share information have been addressed properly.

Thereafter the DSO will make decisions accordingly within 24 hours of the concern being alerted to them. The DSO may make any of these decisions:

- i. There is no further action to take. This is because there are no safeguarding concerns.
- ii. The threshold has not been met to refer to an external agency. The prison may:
 - a. continue to provide support to the individual directly
 - b. continue to monitor the safeguarding needs for the person.
 - c. signpost the person to other sources of help
 - d. refer to another agency, either voluntary or statutory agencies, for support and early help, such referrals will require the informed consent of the mentee.
- iii. Referral is made to the local authority social care if there is reasonable cause to suspect that the person has experienced or is at risk of abuse or neglect or there are serious concerns about the wellbeing of the person or another person including a child.
- iv. Refer to the Police or other Emergency Services if there is an emergency situation requiring immediate action.

Stage 4: After 24 hours, clarify with the prison's DSO what steps they have taken to address the safeguarding matter and make a record on the mentees file of the actions taken.

Stage 5: If you and the Trailblazer's DSO are not satisfied with the response of the prison's DSO about the safeguarding action, for reasons such as:

- they have taken no action when you consider they should have
- they have unnecessarily delayed any action or enquiry
- they have taken action but to a different threshold than you consider appropriate then this must be followed up.

The Trailblazer's DSO should liaise with the prison's DSO to resolve the matter and ensure that appropriate safeguarding action has been taken.

If the matter cannot be resolved then the matter should be escalated with the Trailblazers DSL liaising with the prison's DSL to seek to resolve the matter.

The escalation process is to be used to support information sharing and collaborative working between Trailblazers and prisons. However it must not result in undue delay to alert the relevant agencies of any safeguarding matter.

If the prison declines to take any safeguarding action then the DSO at Trailblazers must make the referrals and take safeguarding action themselves and inform the prison that they have do so. The Trailblazers DSO must follow the process described below in paragraph A3.

Records must be made of all actions on an ongoing basis.

Stage 6: In all cases, records must be kept of all conversations, observations and reasons for decisions. A decision to take no further action or monitor a situation is as important to record as a decision to take action or make a referral out.

Stage 7: The DSO will debrief with staff and to offer support and supervision during and after any safeguarding incidents.

A3. Responding to a safeguarding concern when mentees are in the community

Where a mentee is in the community and a safeguarding concern becomes evident, however small, this procedure must be applied.

Stage 1: Speak to the DSO about your concern, however minor it may seem. This should be done on the same day that you identify the concern or immediately afterwards.

Stage 2: Record all relevant details on the safeguarding concern form (Appendix 3) and forward to the Trailblazers DSO. All subsequent actions and decisions must be recorded.

Stage 3: The DSO, having clarified the concerns and understood the relevant background, will make decisions about the next steps to take. In so doing, the DSO:

- may seek advice from others either at Trailblazers or external agencies e.g. the local authority.
- will ensure, if it is appropriate, that the safeguarding concern has been discussed with the mentee to obtain their view of what they would like to happen and to ensure they are informed of our duty to pass on our concerns if this is required.
- establish if others are affected for whom safeguarding should also be considered, e.g. children in the family, other adults at risk, other mentees or staff at Trailblazers.
- will clarify matters regarding consent to share information have been addressed properly.

Thereafter the DSO will make decisions accordingly within 24 hours of the concern being alerted to them. The DSO may make any of these decisions:

- i. There is no further action to take. This is because there are no safeguarding concerns.
- ii. The threshold has not been met to refer to an external agency. There may be concerns but they are of a degree and nature that do not meet the need for a referral to police or social services, or the mentee does not give consent to report and their right to confidentiality cannot be breached. Trailblazers can continue to provide support to the service user and/or signpost them to other sources of help. Trailblazers may:
 - a. continue to provide support to the mentee directly.
 - b. continue to monitor the safeguarding needs for the mentee.
 - c. signpost the person to other sources of help.
 - d. refer to another agency, either voluntary or statutory agencies, for support and early help, such referrals will require the informed consent of the mentee.
- iii. Referral is made to the local authority social care if there is reasonable cause to suspect that the person has experienced or is at risk of abuse or neglect or there are serious concerns about the wellbeing of the person or another person including a child. Information sharing with other agencies must be in line with the principles set out in this policy.

The referral must be made immediately, and telephone referrals should be confirmed in writing within 24 hours. The Referral should be thoroughly documented and include the following areas (where information is not available it should not delay making the referral).

- The full name, address and date of birth of the mentee or person at risk
- Additional needs arising from health needs or disability; language needs; ethnicity; religion
- Names, addresses and dates of birth/ages of family members, carers and relevant others
- Details of relevant professionals (e.g. GP, CPN, Probation Officer)
- The nature of the concerns, how concerns have arisen
- Relevant background history or context, risks
- Your views and assessment and what you consider needs to happen next
- If there is consent to share information, or if the person has been informed the referral is being made
- Your identifying details and contact details.

The local authority should acknowledge the referral but if the DSO has not heard from them within 3 days, further contact must be made with them.

If a referral is not accepted, the local authority should tell the DSO and give reason for their decision. If the DSO remains concerned, they should be proactive in pursuing further discussions with the local authority and consider escalating their concerns through the multi-agency safeguarding adults procedure.

After the referral has been made, ongoing work by the DSO or mentor may be required, including providing further reports or attendance at meetings, in line with the multi-agency procedures.

If a mentor has raised a safeguarding concern with the DSO which has not been referred to an external agency when the mentor thinks it should have been, the mentor should raise the matter with the DSL. If the DSL also decides not to refer, any staff member can make the referral themselves to an external agency directly, and inform the DSL that they have done so.

- iv. Refer to the Police or other Emergency Services if there is an emergency situation requiring immediate action.
- v. At any time, the DSO can seek advice from the local authority, Police or any of the specialist agencies listed in Appendix 2.

Stage 4: In all cases, records must be kept of all conversations, observations and reasons for decisions. A decision to take no further action or monitor a situation is as important to record as a decision to take action or make a referral out.

Stage 5: The DSO will debrief with staff and to offer support and supervision during and after any safeguarding incidents.

B. Procedure for Managing Allegations against Staff

All staff should apply safer working practices so there is no misunderstanding about well-intentioned behaviour.

This procedure should be used if there are safeguarding concerns against staff (which includes volunteers and trustees). Concerns may be due to staff behaviour which is causing harm to mentees, to adults or children, the public or other staff in our organisation. These concerns may be about the colleagues' behaviour at work or in their private life. All staff have a responsibility to ensure that Trailblazers is a safe organisation, and we must not ignore or dismiss suspicions about a colleague who may be abusing, neglecting or causing harm to another person.

Safeguarding concerns can include where a member of staff may have:

- I. behaved in a way that has – or may have - harmed an adult or a child or behaved in a way that could lead to an adult or child being harmed
- II. possibly committed, or is planning to commit a criminal act to an adult or a child
- III. behaved toward an adult or a child in such a way that it indicates that they could pose a risk of harm to mentees or be unsuitable to work with mentees or in any capacity

whether this has occurred whilst working at Trailblazers or elsewhere, including online. These concerns about staff may arise in various circumstances, for example:

- someone makes an allegation against them
- there are concerns about their working practices, they have breached the Safeguarding Policy and Procedure or the Code of Conduct.
- has a complaint or grievance made against them or there is a disciplinary or performance measure being undertaken which leads to concerns about their behaviour
- there are concerns about their behaviour outside of work e.g. they have harmed a child or an adult at home or in another organisation or they have accessed illegal online material.
- they no longer work at Trailblazers and allegations come to light about them (historical or non-recent concerns).
- their child is subject to child protection procedures or they have care responsibilities for an adult at risk who has been harmed in their care
- they are subject to criminal procedures that indicate they could be a risk to others
- new information is contained in a Disclosure and Barring List (DBS) renewal check.

These concerns may be unfounded or allegations may be false or malicious but they may also be founded. The outcome cannot be known until a proper enquiry has been undertaken using this procedure. It is important that all allegations are taken seriously and not ignored. Staff must report all concerns to the DSO or DSL so they can be properly addressed in line with this procedure and outcomes recorded. The report must be made immediately or as soon as possible after the concern comes to light and within the day. The allegations must then be dealt with fairly, consistently and in a timely way.

B1 Responding to an emergency

If anyone needs immediate emergency support, call 999 straightaway and inform the DSO and DSL. Record using Appendix 3.

B2 In all cases

Speak to the DSL about your concern. Even low level concerns should be reported, as these matters may need to be addressed through training, support or management of the member of staff. The report should be made immediately and on the same day that the concern is identified.

If the concern is about the DSL the Chair of Trustees must be notified, or another Trustee if the Chair is not available or the concern is about them. Thereafter, it will be decided who will undertake the inquiry. If you are not satisfied about your concerns being taken seriously or addressed by the DSL or trustees, you can contact social services directly or use the whistleblowing procedure.

The subject of the allegation should not be notified.

Follow the steps below and refer to the flowchart for Managing Allegations against Staff (Appendix 5). Record all relevant details on the safeguarding concern form (Appendix 3) and hand to the DSL. The DSL will ensure that all subsequent actions and decisions are recorded.

B3 Steps the DSL may take

The DSL will lead in the management of the allegation (unless the allegation relates to the DSL) and should follow this process for managing allegations against staff, dealing with matters quickly, fairly and consistently. The inquiry will need to differentiate between poor care that may have been provided to service users and possible safeguarding issues.

The safety of mentees, adults at risk and children is paramount. If there is a known mentee at risk, the DSL will ensure that the person is spoken to and their experience and concerns are understood and taken into account. The DSL will also seek to ensure that any actual or potential evidence is secured and the staff member is supported.

The DSL will ensure that concerns are shared at an early stage with both Trustees and external agencies including police, local authority and if relevant, the Local Authority Designated Officer (LADO) for children. The LADO is the nominated person in the local authority who is responsible for managing and monitoring safeguarding allegations about paid and unpaid staff who work with children and adults at risk; the LADO will provide advice, information and guidance to employers about safeguarding allegations. Trustees and the DSL may also need to alert commissioners, regulatory bodies and Charity Commission under their reporting serious concerns framework.

Four strands of enquiry

There may be up to four strands in the management of a safeguarding allegation and any or all of them may be required depending on the circumstances.

Strand 1: A police investigation if a criminal offence may have been committed

A report must be made to the Police and a crime reference number obtained where there has been a crime or a crime is suspected. Allegations about staff/volunteers who are no longer working for Trailblazers must also be reported to the Police.

Strand 2: Enquiries by local authority social care about adult at risk safeguarding

Adults at risk who have been harmed must be protected and given support. Their immediate safety and the safety of other clients (current or historical) must be addressed. This will involve making referrals to the local authority as per the above 'procedure for managing concerns about clients'.

Strand 3: Trailblazers internal process including considerations about disciplinary action

Internal investigations must be taken without delay without compromising or delaying reports to police or the local authority, and they must:

- maintain confidentiality for the subject of the allegation during the investigation period.
- ensure the subject of the allegation has their case dealt with fairly, quickly and consistently and is kept informed of progress. They should have a named contact at Trailblazers and be signposted to external support e.g. counselling services.
- make decisions about suspension or other alternatives such as allocating other duties during the investigation period. Suspension is not the default option and alternatives to suspension will always be considered. Alternatives could include redeployment, limiting duties or increasing supervision. Where suspension takes place, it is seen as a neutral act and does not imply guilt. Suspension should be considered where: Police are investigating allegations; the allegation is so serious that if it is substantiated, it would be grounds for dismissal; the person against whom the allegation is made may put pressure on others who are witnesses or may pose ongoing risk which cannot be managed satisfactorily without suspension. In any event, whilst inquiries are ongoing, the worker in question should preferably not be in contact with clients.
- Outcomes of the investigation may fall into these areas:
 - there is sufficient evidence to state that the allegation is substantiated and there has been harm to the service user.
 - there is sufficient evidence to disprove the allegation and say it is malicious. Malicious allegations made by another member of staff may result in disciplinary procedure against the referrer. Where police are involved, this may lead to charges of wasting police time.
 - there is sufficient evidence to disprove the allegation but it was not made to deceive. False allegations may occur due to a misunderstanding and it is important to consider what may have driven a false allegation, including other welfare concerns.
 - there is insufficient evidence to either prove or disprove the allegation which is therefore unsubstantiated.
 - there is no evidence or proper basis which supports the allegation being made and the allegation is unfounded.

The range of options open will depend on the circumstances of the case and take into account the result of a Police investigation or criminal trial, any safeguarding enquiries about the adult at risk as well as Trailblazer's duty to safeguard the charity, its staff and clients. Options include:

- reintegrating the member of staff into the job role
- changes to the job description or working patterns
- invoking the disciplinary process or dismissal
- alerting other known employers of the individual concerned
- referring to the Disclosure and Barring Service
- alerting the Charity Commission or the charity's commissioners, insurance company or professional regulating bodies of the subject of the allegation
- if there are any consequences for staff who have made malicious allegations. There should be no consequence for staff who make allegations in good faith where those allegations are not substantiated or are unfounded.

Decisions must be implemented as soon as possible and in three working days of the decision being made by Trailblazers. The subject of the investigation must receive a letter in five working

days of the conclusion of the investigation clarifying its outcome and any implications for their employment.

Strand 4: Referral to Disclosure and Barring Service (DBS)

Trailblazers has a duty to refer to DBS any person engaged to work in regulated activity where the allegation has been substantiated or where there has been harm caused. DBS will consider whether the person should be barred from working with children or adults at risk.

Referrals to DBS will be made where we withdraw permission for a person to work in regulated activity with adults at risk, including moving them to do work that is not regulated activity. We will also refer to DBS where we would have taken this action, but the person was re-deployed, dismissed, resigned, retired or left. The DBS referral can take place at any time during the allegations process and at the earliest stage possible.

Failure to report to DBS in these circumstances is an offence. The referral process is outlined on the DBS website and they can be contacted for advice if there is uncertainty as to what to do.

Planning

An initial plan for the enquiry with proposed actions and timescales must be confirmed by the DSL within one working day. This should consider at least these areas:

- which of the four stands of inquiry (as listed above) are thought to be required at this stage (this may change as the enquiry progresses). Investigation by local authority and/or police take precedence over an internal investigation.
- Immediate action as needed to safeguard mentees, staff, the building or services
- If advice or information is needed from others eg other agencies, trustees, staff or if referrals need to be made
- Securing any records or removing equipment or devices from the subject of the allegation or their access to parts of the building or shared drives etc.
- What information to share with the subject of the allegation and with any other known employer (if they work elsewhere)
- Arrangements to support the subject of the allegation, decisions about suspension or altering their duties
- What information to share with other staff or mentees
- How to manage media interest if it should arise
- If the Trustees consider that the criteria is met for a serious incident report being made to the Charity Commission.

B4 Other Considerations

Lack of co-operation

In all cases, recording the allegation, identifying any evidence and making a judgement as to whether it is substantiated should continue as far as possible. Full opportunity will be given to the person to respond to the allegation. Every effort will be made to conclude all cases where allegations are made, even where:

- the person concerned refuses to cooperate, resigns or otherwise stops providing their services.
- it is difficult to reach a conclusion.
- the person is deceased.

Compromise Agreements, Settlement Agreements or Non-Disclosure Agreements

These are agreements whereby a person agrees to resign with the agreement that the employer will not pursue disciplinary action, and where both parties agree a form of words to be used in any future reference.

These types of agreement must never be used in these cases nor can Trailblazers duty to report to DBS, where the criteria is met, be overridden.

References

Where allegations are considered to be false, unsubstantiated or malicious, these should not be included in employer references.

Record Keeping

Details of allegations that are found to have been malicious should be removed from personnel records.

Thorough records must be kept of other allegations, including the allegation, how it was managed, actions taken and decisions reached. This should be kept on the confidential personnel file of the subject of the allegation. The record should be kept at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Key Contacts at Trailblazers

– staff contact details included on internal policy

Designated Safeguarding Person (DSO)			
Name:	Ezgi Ozkan	Tel:	
Mobile:		Email:	
Job Title:	Project Manager (HMPYOI ISIS)		
Designated Safeguarding Person (DSO)			
Name:	Yemi Obiwumi	Tel:	
Mobile:		Email:	
Job Title:	Project Manager (HMP Brixton)		
Designated Safeguarding Person (DSO)			
Name:	John Edu-Amuah	Tel:	
Mobile:		Email:	
Job Title:	Career Service Manager		
Designated Safeguarding Person (DSO)			
Name:	Steph Smith	Tel:	
Mobile:		Email:	
Job Title:	Project Manager (HMPYOI Brinsford)		
Designated Safeguarding Person (DSO)			
Name:	Clare Haynes	Tel:	
Mobile:		Email:	
Job Title:	Project Coordinator (HMP Featherstone)		
Lead Trustee for Safeguarding			
Name:	Jo Danton	Tel:	
Mobile:		Email:	
Title:	Trustee		
Chair of Trustee's			
Name:	Carina Kemp	Tel:	
Mobile:		Email:	
Title:	Chair		
Designated Safeguarding Lead (DSL)			
Name:	Julia Alexander	Tel:	
Mobile:		Email:	
Title:	CEO		

Key External Contacts and Resources

Emergency Services	
Police (non emergency)	Tel 101
Emergency Services	Tel 999
Police Anti-terrorism Hotline	Tel 0800 789 321
Police Prevent Team	Tel 101
Local Authority	
A-Z of councils and their social media links	https://www.local.gov.uk/our-support/guidance-and-resources/communications-support/digital-councils/social-media/go-further/a-z-councils-online
Radicalisation	
HM Govt Report radicalisation concerns online	https://act.campaign.gov.uk/
Home Office Radicalisation e-learning module	https://www.elearning.prevent.homeoffice.gov.uk
Adult Safeguarding	
Ann Craft Trust Resources and support for safeguarding adults	Tel 0115 951 5400 Website: http://www.anncrafttrust.org/safeguarding-adults-sport-activity/
NAPAC (National Association for People Abused in Childhood) Helpline and online support	Tel 0808 801 0331 Email support@napac.org.uk
Mencap Direct Helpline and support	Tel: 0808 808 1111 E-mail help@mencap.org.uk www.mencap.org.uk
MIND Helpline and support	Tel 0300 123 3393 Text 86463 E-mail info@mind.org.uk www.mind.org.uk
National Autistic Society Helpline and support	Tel 0808 800 4104 Website www.autism.org.uk
Children's Safeguarding	
NSPCC Helpline For anyone concerned about a child	Tel 0808 800 5000 Email help@nspcc.org.uk
Childline	Tel 0800 1111
NSPCC Whistleblowing Helpline	Tel 0800 028 0285 Email help@nspcc.org.uk .
NSPCC FGM Helpline	Tel 0800 028 3550 Email fgmhelp@nspcc.org.uk
Triangle Support and advocacy re disabled children	Tel 01273 305 888 https://triangle.org.uk/
Family Lives	Tel 0808 800 2222
Child Trafficking Advice Centre	0808 800 5000.

Child Exploitation and Online Protection Centre(CEOP)	0870 000 3344
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Other National Services	
Victim Support	Tel 0808 168 9111 www.victimsupport.org.uk
National Domestic Violence Helpline	Tel 0808 2000 247
FGM FORWARD Training and Support	Tel 020 8960 4000 Email forward@forwarduk.org.uk
Forced Marriage Helpline	Tel 0800 599 9247
Forced Marriage Unit	Tel 0207 008 0151 Out of office hours contact: 0207 008 1500 (ask for Global Response Centre).
UNSEEN Modern Slavery	Telephone: 0303 040 2888 Helpline: 08000 121 700 Website: https://www.unseenuk.org/
British Institute of Learning Difficulties Training and Resources	Tel 0121 415 6960 www.bild.org.uk
The UK Safer Internet Centre	0844 381 4772
Disclosure & Barring Scheme	https://www.gov.uk/government/organisations/disclosure-and-barring-service

Trailblazers Safeguarding Incident Report Form

Safeguarding Concern/Incident Form

To be completed as soon as possible following the incident and within 24 hours

Subject of Incident:	
Named Person Completing the incident Form and job role:	Name of the Project:
Email Address:	Phone Number:
Date of Occurrence:	Time:
Exact Location Incident Occurred:	
<p>Tick the relevant box regarding the incident</p> <p> Accident <input checked="" type="checkbox"/> Inappropriate behaviour <input type="checkbox"/> Intoxicated/under the influence of drugs <input type="checkbox"/> </p> <p> Prohibited Items <input type="checkbox"/> Violence <input type="checkbox"/> Safeguarding Concern <input type="checkbox"/> </p> <p> Health&Safety <input type="checkbox"/> Other <input type="checkbox"/> </p>	
<p>Describe the circumstances of the incident i.e., who was present, any witnesses, was the police involved, has probation been involved, has anyone gone to hospital. Factual information to be recorded rather than thoughts or opinions.</p>	

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What immediate action have you taken to address the incident and who has it been reported to externally from Trailblazers:

Describe measures taken to prevent further incidents happening and the relevant policy you have used to support your decisions:

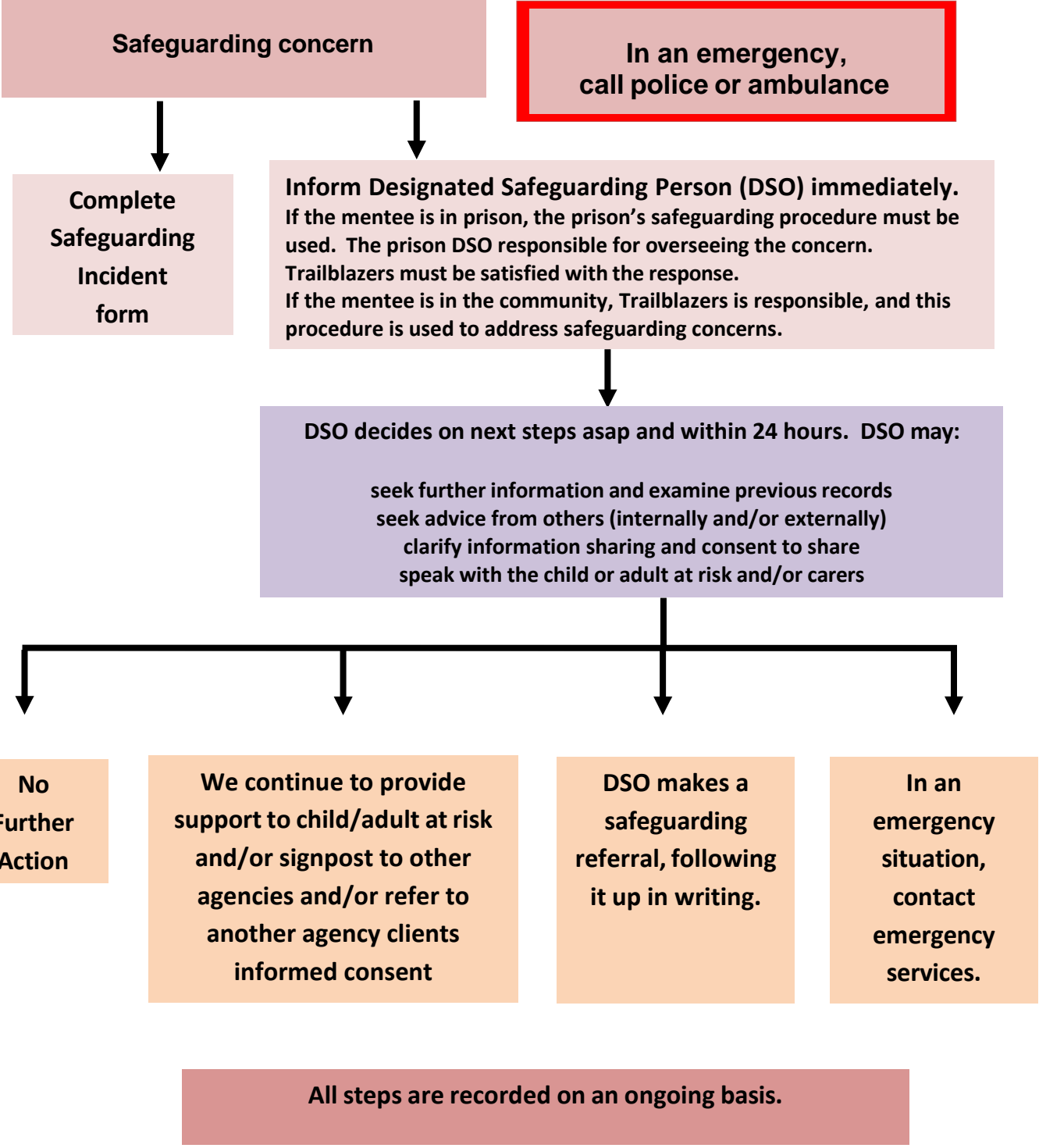
Named Person reported to in Trailblazers:	Date Reported:
--------------------------------------------------	-----------------------

Below to be completed by Trailblazers Senior Leadership Team

Actions taken by Trailblazers SLT:

Additional action required by SLT	
Reported to risk task group: Yes/No	Further action required from risk task group: Yes/No (Provide further information in additional box below)
Named Person (SLT) completing form:	Date completed:
Additional Information:	

Flowchart for Managing Safeguarding Concerns
(see policy and procedure for detailed guidance).



**Flowchart for Managing Allegations Against Staff
(includes Volunteers)**

(see policy and procedure for detailed guidance).

Safeguarding concern about a member of staff who has:

- Behaved in a way that has harmed an adult at risk or a child
- Possibly committed a criminal act to an adult at risk or a child
- Behaved in a way that indicates they could pose a risk of harm

whether this has occurred whilst working at Trailblazers or elsewhere, including online.

Complete Safeguarding Incident Form

**Inform Designated Safeguarding Lead (DSL)
Inform Chair of Trustees if concern is about the DSL**

DSL decides on next steps asap and within 24 hours. DSL may:
seek further information and examine previous records;
seek advice from others or share information with Local Authority, Police, DBS, commissioners;
speak with staff and/or clients.

Report to Police or Local Authority Safeguarding

Make a safeguarding referral, followed up in writing where there are safeguarding concerns for child or adult at risk.

Undertake internal investigation in relation to employment or volunteering

**Report to DBS
Report to other bodies**

All steps are recorded on an ongoing basis.

Identifying Abuse and Neglect for Children

Children's Safeguarding

Trailblazers only works with adults (those aged over 18 years). However we understand the importance of thinking broadly about how safeguarding concerns may become apparent and that we may encounter child safeguarding concerns from time to time, for example an adult mentee may: have been abused when they were a child; be looking after a child who we become concerned about; disclose they were harmed when they were a child by someone who currently has access to other children who may be at risk of similar harm.

It is important that we are vigilant about all potential safeguarding issues and this Appendix sets out some wider context for children's safeguarding.

Definition of 'child'

A 'child' is anyone who has not yet reached their 18th birthday, regardless of whether they have left home or are working.

Definition of 'safeguarding'

The definition of 'safeguarding' is:

- Protecting children from abuse and maltreatment
- Preventing harm to children's mental or physical health or development
- Ensuring children grow up with the provision of safe and effective care
- Taking action to enable all children and young people to have the best outcomes

Child protection is part of safeguarding and promoting welfare and it refers to the work that is done to protect children who are suffering, or are likely to suffer, significant harm.

Paramourcy principle

A key principle of the Children Act 1989 is that the welfare of the child is paramount. This refers to an approach to keeping the child's best interests at the heart of all decisions.

Defining 'abuse' and 'neglect'

Abuse and neglect are types of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Four categories and indicators of abuse and neglect

Working Together 2018 (updated 2020 version) sets out four categories of abuse and neglect that children may experience – these are physical abuse, sexual abuse, emotional abuse and neglect. These are not an exhaustive list and abuse and neglect can take place in many ways.

Please refer to Appendix 7, Types of Abuse and Neglect & Recognising Signs.

Types of Abuse and Neglect & Recognising Signs

Categories and Indicators of Abuse and Neglect

The Care and Support Statutory Guidance 2020 sets out ten categories of abuse and neglect that adults may experience. This is not an exhaustive list as abuse and neglect can take place in many forms and in different circumstances.

The first ten categories that are defined below are as stated in the Care and Support Guidance with some signs and indicators that may help to identify the harm. This is followed by additional categories, also along with their definitions and signs and indicators.

The signs and indicators listed are not an exhaustive list. Any one sign cannot be taken on its own as proof that abuse is occurring but should alert us to make further assessments. People may show signs as a result of distress and trauma not related to abuse, some people may not show any signs, for some people signs of abuse may be misinterpreted due to medications or disability.

Multiple forms of abuse may also occur, making it important to look beyond single incidents or types of abuse. Any or all of these types of abuse may be perpetrated deliberately or through negligence or ignorance, it is the welfare of the person that is of paramount concern however and not the motivation of the abuser.

Category of Harm	Possible Signs & Indicators
Physical Abuse	
<ul style="list-style-type: none"> • assaults: e.g. hitting, slapping, pushing, • misuse of medication • inappropriate restraint • inappropriate physical sanctions 	<ul style="list-style-type: none"> • bruising, cuts, burns and/or marks on the body, clumps of hair loss • fractures, sprains, dislocations • pressure sores • frequent or unexplained injuries or falls • drowsiness, confusion due to over sedation • inconsistent or no explanation for injury • subdued or noticeable change in behaviour • signs of malnutrition, dehydration • failure to seek medical treatment
Sexual Abuse	
<ul style="list-style-type: none"> • rape, sexual assault • sexual acts to which the adult has not consented, could not consent to due to mental incapacity or was pressured to consent • indecent exposure • sexual harassment • sexual teasing or innuendo • sexual photography • subjection witnessing sexual acts 	<ul style="list-style-type: none"> • bruising, bleeding or injuries, particularly to areas such as thighs, buttocks, genital area • torn, stained or bloody underclothing • difficulty walking or sitting • infections or sexually transmitted diseases • changes in behaviour or attitude • self-harming • poor concentration, withdrawal from others, sleep disturbance • excessive fear of certain relationships
Neglect	
<ul style="list-style-type: none"> • ignoring emotional or physical needs such as food, water, shelter, guidance • failure to provide access to appropriate medical, health, care and support or educational services 	<ul style="list-style-type: none"> • unkempt appearance • inadequate clothing • poor personal hygiene • malnutrition and dehydration • infections, illness, pressure sores

<ul style="list-style-type: none"> withholding life's necessities, such as medication, adequate nutrition and heating 	<ul style="list-style-type: none"> not attending medical appointments
Psychological Abuse	
<ul style="list-style-type: none"> emotional abuse threats of harm or abandonment deprivation of contact, isolation humiliation, blaming, controlling coercion, harassment, intimidation cyber bullying unreasonable withdrawal of services or support networks 	<ul style="list-style-type: none"> withdrawal or change in the behaviour and temperament of the person uncooperative and aggressive behaviour signs of distress: tearfulness, anger, fear low self-esteem, depression insomnia change of appetite, weight loss or gain running away
Domestic Abuse	
<p>Domestic abuse covers the following:</p> <ul style="list-style-type: none"> physical abuse; psychological abuse; sexual abuse; financial abuse; emotional abuse; so called 'honour' based violence. <i>'Honour-based' violence is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community.</i> (CPS and Home Office definition). Forced marriage is also a form of domestic abuse. <p>Coercion and control often underpins domestic abuse: what can seem like agreement from one party could be false representation due to the power another individual can gain.</p>	<ul style="list-style-type: none"> low self-esteem self-blame for events outside of their control injuries hearing derogatory comments about self fear of an individual isolation – not seeing friends and family, partaking in activities limited access to money, without reason hypervigilance
Financial Abuse	
<ul style="list-style-type: none"> theft, fraud, internet scamming coercion about finances including about wills, property, inheritance or financial transactions misuse or theft of property, possessions or benefits move into a person's home without consent 	<ul style="list-style-type: none"> fear of particular people unable to make reasonable purchases money disappearing, debt (without reason) unable to pay bills inadequate clothing hungry
Modern Slavery	
<ul style="list-style-type: none"> slavery human trafficking forced labour and domestic servitude, sexual exploitation, debt bondage 	<ul style="list-style-type: none"> physical, emotional abuse or sexual abuse signs as above malnourishment withdrawn and / or fearful of others poor living or work conditions lack of identification documents fear of police or authorities
Discriminatory Abuse	
<ul style="list-style-type: none"> harassment slurs or similar treatment because of: <ul style="list-style-type: none"> race, gender and gender identity, age, disability, sexual orientation, religion 	<ul style="list-style-type: none"> withdrawn and isolated anger, frustration fear or anxiety excluding from groups or services sub-standard services received
Organisational	
<ul style="list-style-type: none"> neglect or poor practices in organisations and care settings and care provided in own home. ranging from one off incidents to ongoing ill-treatment. arising from neglect or poor professional practices 	<ul style="list-style-type: none"> poor policy, procedure, management poor practices eg early bedtimes, over medicating, unnecessary restrictions being confined no flexibility, lack of choice lack of privacy, breaching confidentiality low numbers of staff or poorly trained staff denial of basic needs, eg food, water

GROOMING	
Definition	Signs
<p>Grooming is when someone tries to build a relationship and create trust with a child or adult at risk to manipulate, exploit and abuse them. The groomer may set up a false relationship with their victim which may seem romantic, educative or friendly.</p> <p>The groomer may use tactics like pretending to be someone else, showing understanding or care, buying gifts, giving attention, taking the victim on outings. They may try to isolate the victim from their family and friends, create dependency, use blackmail to gain a hold over the victim, introduce 'secrets' to control the victim or frighten them.</p> <p>Grooming can take place over a short or long period of time by males or females, old or young, a stranger or someone who is known. It can take place online or in person.</p> <p>Groomers may also groom other people such as carers, friends or, professionals so that they seem trustworthy and be able to gain access to the victim. People may not realise they have been groomed.</p>	<p>Victim</p> <ul style="list-style-type: none"> • Secretive about how they spend time • Having money or items like they can't explain • Drinking or drug taking • Upset, withdrawn or distressed • Sexualised behaviour • Spend time away from home or going missing <p>Groomer</p> <ul style="list-style-type: none"> • Sexualised talk, 'jokes', 'banter', questioning, images • Physical contact e.g. hugging, touching, kissing, tickling, wrestling • Not respecting privacy • Spend excessive time with victim; gives special attention, favouritism, finds ways to be alone with the victim • Not adhering to rules of the agency or activity • Giving gifts (including cigarettes, alcohol, drugs) or money for no apparent reason • Set up inappropriate relationships e.g. treating a victim as a friend/spouse • Isolating victim from others • Encouraging silence, secrets, criminal behaviour, lies
	<ul style="list-style-type: none"> • disrespectful or abusive attitudes to clients and families.
Self-neglect	
<p>Covers a wide range of behaviour in which a person neglects to care for own hygiene, health or surroundings and includes behaviour such as hoarding.</p>	<ul style="list-style-type: none"> • unsanitary conditions that pose risk • hoarding • non-attendance at health appointments • not taking prescribed and recommended medication.

Additional Types

SEXUAL EXPLOITATION	
Definition	Signs
<p>Sexual exploitation occurs when a person or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or adult at risk into sexual activity:</p> <p>(a) in exchange for something the victim needs or wants, including attention and affection, drugs, alcohol, or gifts and/or</p> <p>(b) for the financial advantage or increased status of the perpetrator or facilitator.</p> <p>The victim may have been exploited even if the sexual activity appears consensual. Victim's are often groomed into thinking the sexual activity is</p>	<ul style="list-style-type: none"> • Unhealthy or inappropriate sexual behaviour • Being frightened of some people, places or situations • Being secretive • Sharp changes in mood or behaviour • Having money or things they can't or won't explain • Physical signs of abuse, like bruises or bleeding in their genital or anal area • Alcohol or drug mis/use • Sexually transmitted infections • Pregnancy

<p>consensual, or they may be forced or intimidated. Anybody can be a perpetrator of sexual exploitation, no matter their age, gender or race. The relationship between the perpetrator and victim could be framed as friendship or as romantic. Victim's can be trafficked to be sexually exploited or sexual exploitation may occur online.</p>	<ul style="list-style-type: none"> • Staying out late or overnight • Missing from home or care, or stopping going to school, college or work • Having a new group of friends • Hanging out with older people, other vulnerable people or antisocial groups, or a gang
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HUMAN TRAFFICKING	
Definition	Signs
<p>Human trafficking is a crime that involves the movement of people by the use of force, fraud, coercion or deception, with the aim of exploiting them. It is a form of modern slavery.</p> <p>It involves transporting people across nations as well as trafficking around the UK. It can be for commercial, sexual and bonded labour.</p> <p>There are three elements that form part of trafficking:</p> <ul style="list-style-type: none"> • the act of recruiting, transporting, transfer, harbouring or receiving persons • use of the means of force, fraud, coercion, deception • for the purpose of exploitation. 	<ul style="list-style-type: none"> • Behaves as if instructed or coached • Signs of physical or psychological abuse • Untreated medical conditions • Has money deducted from their salary • Little or no contact with family or loved ones • Not in possession of their own legal documents • Seems held in the employer's home/workplace • Works in excess of normal hours • Appears frightened, withdrawn or confused • With a group of workers of a similar nationality, age, gender.

RADICALISATION & EXTREMISM	
Definition	Signs
<p>Radicalisation is a process by which a person comes to support extreme ideologies and be drawn into terrorism. It is a form of harm. It may involve being groomed (online or in person), exploited, exposed to violent material, being harmed or threatened. Anyone can be radicalised but people may be more vulnerable if they are easily influenced, isolated, rejected, discriminated against or feel community tension..</p> <p>Extremism is “the vocal or active opposition to British fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs and calls for the death of mentees of our armed forces” (Counter Extremism Strategy 2015). It can involve targeting vulnerable people by sowing division between communities on the basis of race or faith; or arguing against democracy and the rule of law.</p> <p>The Prevent Duty (s26 Counter-Terrorism & Security Act, 2015) aims to reduce the numbers of people supporting extremism or becoming radicalised. It involves having “due regard to prevent people being drawn into terrorism”.</p>	<ul style="list-style-type: none"> • Isolating self and spending time alone or with social media • Feeling of having no purpose in life; not belonging; low self esteem • Change in emotions and behaviour • Change of routines, in appearance or online activities • Fixated on an ideology, belief or cause • Intolerant of difference such as race, faith, culture, gender or sexuality • Justifying violence to others • Change in language or use of words; closed to new ideas; 'scripted' speech • Have materials or symbols associated with the cause • Attending events, rallies etc of an extremist nature • Sense of grievance; sense of 'them and us' • Conflict with family/friends or lose interest in people who do not have same beliefs • Try to recruit others to join the 'cause'

ABUSE THROUGH TECHNOLOGY	
Definition	Signs
<p>Technology and the internet are an important source of communication, education and entertainment. However some people use them to harm others including to groom and abuse, for example to sexually or criminally exploit, radicalise, cyber-bullying. Abusers can adopt an identity to 'befriend' victim's, get people to share information and images and access financial information.</p> <p>Online safety can fall into these areas of risk:</p> <p>content: exposure to illegal, inappropriate or harmful material e.g. sexual or violent material, offensive material which serves to breed hatred, fabricated news, radical and extremist views</p> <p>contact: subjected to harmful online interaction with other users.</p> <p>conduct: personal online behaviour that increases causes harm, e.g. making, sending and receiving explicit images, or online bullying.</p>	<ul style="list-style-type: none"> • Meeting new friends they've met online • Receiving gifts or money • Withdrawn and secretive • New phone or more than one phone • Receiving large numbers of calls or messages • Worried about being away from their phone • Excessive time on phone or online

**CONFIRMATION OF HAVING READ AND AGREEMENT TO APPLY
TRAILBLAZERS SAFEGUARDING POLICY AND PROCEDURE**

To be completed during induction and within two weeks of new policy and procedure being issued annually

Name:

Date of Appointment:

Date Policy and Procedure Discussed:

I have read and I understand the Safeguarding Policy and Procedure. I agree to adhere to its requirements during my work at Trailblazers.

YES/NO (circle as applicable)

I have had the opportunity to discuss the Safeguarding Policy and Procedure with my line manager.

YES/NO (circle as applicable)

NAME OF
WORKER/VOLUNTEER/TRUSTEE:

SIGNATURE OF
WORKER/VOLUNTEER/TRUSTEE:

DATE:

NAME OF MANAGER:

SIGNATURE OF MANAGER:

DATE: