



# Safeguarding Adults and Children Policy

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<b>Departmental Owner</b>	Operations

## 1. Policy Statement

Green Light Trust (GLT):

- Strongly believes that all children, young people and adults at risk have the right to protection from all forms of abuse and harm, including sexual abuse, harassment, exploitation, neglect, and any other harm that may impact their safety and wellbeing
- Has a zero-tolerance policy for any abusive or harassing behaviour across all its services and activities
- Is committed to making adult safeguarding personal
- Will actively promote the welfare of all children, young people and adults at risk by working to the best possible safeguarding standards across all its services and activities, with appropriate arrangements in place to safeguard and protect
- Recognises that all employees and volunteers have a key safeguarding role to play and is committed to ensuring that everyone, individuals and organisations, who are involved with GLT, are clear about their roles and responsibilities
- Will work with their colleagues in social care, health services and the police, in keeping people safe. The scope of GLT's work means it's well placed to identify people with care and support needs and will co-operate, liaise and work with the statutory agencies at all times
- Values and nurtures its links between local public protection forums such as Multi agency risk assessment conferences (MARACs), Multi-agency public protection arrangements (MAPPAs), Health and wellbeing boards and Community safety partnerships.

This policy relates to people supported by GLT. Should an employee or volunteer have any concern that they or a colleague is or has been subject to harm or abuse in the workplace then they should raise this with a manager immediately or directly with the People Services Team.



## 2. Policy Aims

This policy is intended to be the overarching safeguarding control document for all of GLT's services and activities. It applies to, and must be adhered to by all employees, workers and volunteers including agency workers.

- It is reviewed by the policy owner every year. Amendments are proposed to the People Committee, who recommend it to the Board of Trustees for approval
- It is also updated by the policy owner whenever there are changes in law, statutory guidance, practice, service provision or if near miss events occur. Any changes are then approved by the People Committee.
- All employees, workers and volunteers will be given a full induction, relevant to their job role and service, and have access to this full policy upon appointment. They will also undertake supervision and /or safeguarding training as relevant to their job role. Everyone will confirm to say they have read, understood and will comply with GLT's safeguarding arrangements
- GLT publishes this policy on its website and disseminates it as appropriate to all who come into contact with GLT
- Independent associates, contractors, freelancers and partners are expected to have their own robust safeguarding policies, procedures and safer recruitment arrangements in place but will comply with this policy when working for GLT
- Failure to comply with this policy will be considered a disciplinary matter, or a breach of contract, and be dealt with accordingly. For volunteers this could result in their agreement with GLT ending.

## 3. GLT background

Green Light Trust was founded in 1989 as a conservation charity and has since become a key provider across Norfolk and Suffolk of education and well-being programmes for people facing multiple barriers to well-being, independence and inclusion.

## 4. Legal Context and Background (See Appendix 1 for Safeguarding definitions)

This policy complies with [the care act](#) and [associated statutory guidance](#), the [Mental Capacity Act 2005](#), the Children Acts [1989](#) and [2004](#), [Working Together to Safeguard Children](#), [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#) [KCSIE], [What to do if you're worried a child is being abused](#), other relevant [adult and child safeguarding](#) legislation and statutory guidance, the [relevant Partnership's and Board's](#) policies and procedures where GLT is based and works; the [Care Quality Commission \(CQC\)](#) framework for inspection; [CAPSEAH](#) and the [Charity Commission](#).

## 5. The Six Principles of Adult Safeguarding:

- Empowerment: People are supported and encouraged to make their own decisions and informed consent

- Prevention: It is better to take action before harm occurs
- Proportionality: The least intrusive response appropriate to the risk presented
- Protection: Support and representation for those in greatest need
- Partnership: Services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
- Accountability: Accountability and transparency in delivering safeguarding

## 6. Mental Capacity

Mental capacity is defined in the 'Mental Capacity Act 2005' and the 'Mental Capacity Act, Code of Practice' supporting statutory guidance. Safeguarding at GLT respects the autonomy and independence of all our participants and this policy and our associated procedures include the presumption of mental capacity (Please refer to GLT's Mental capacity and DoLS policy). Our participants must be assumed to have capacity to make decisions that affect them and all practical steps should be taken to help them make that decision. Mental capacity should be assessed in relation to the particular decision that needs to be made. Therefore whether a person has mental capacity to make a particular decision or not has to be considered on an individual basis in the light of the circumstances at the time.

Consent driven approach means employees and volunteers should not act without consultation and the consent from the adult at risk unless it has been properly assessed that the adult does not have the mental capacity to make that decision or in order to act in the vital interest of others (this may include an emergency situation or in the interest of the public to prevent the abuse or neglect of others).

### **The following five statutory principles of Mental Capacity must be applied in all cases:**

- Always assume a person has capacity unless it is assessed otherwise
- Take all practical steps to enable people to make their own decisions
- Do not assume incapacity because someone makes an unwise decision
- Always act, or ensure a decision is made for a person without capacity in their best interests
- Carefully consider actions to ensure the least restrictive option is taken.

## 7. Partners

In line with [Charity Commission](#) guidance, all [partner agreements](#) for independent associates, contractors, freelancers and partners will include signed confirmation, as relevant, that they:

- Carry out criminal records checks for their employees, workers and volunteers, as appropriate
- Train all employees, workers and volunteers in safeguarding at the appropriate level for their job role

- Will inform GLT, without delay, if they identify any safeguarding concerns, allegations of abuse or serious incidents when delivering activities or services commissioned by GLT.

## 8. Named Persons for Safeguarding

Job Role and Named Person	Contact details
Chief Executive Officer (CEO)	Email: helena@greenlighttrust.org Tel: 07596 863284
Trustee – Nigel McCurdy	Email: chair@greenlighttrust.org
Strategic Lead	Email: hannah.seymour@greenlighttrust.org Tel: 07842 422172
Designated Safeguarding Leads	A list of safeguarding leads can be located within Beacon

### The CEO will:

- Oversee safeguarding allegations against employees or volunteers, together with the Strategic Safeguarding lead (or Trustee safeguarding lead where the CEO or Strategic Safeguarding Lead is implicated).
- Ensure that there is a quarterly safeguarding report submitted to the People Committee, and an annual safeguarding report to the Board of Trustees. Monitor and review any safeguarding concerns about any of GLT activities.

### The Named Trustee for Safeguarding will:

- Be the point of escalation in the event of significant harm or death to a participant and/or significant risk to the organisation
- Be the point of contact for Whistleblowing
- Review quarterly reporting of safeguarding, training and best practice, and DBS compliance across GLT
- Be a point of contact for employees or volunteers if someone wishes to complain about a lack of action in relation to safeguarding concerns
- Work with the Chair of the Board, CEO and Strategic safeguarding lead where there are serious safeguarding cases
- Ensure that as Lead Trustee for safeguarding, they either have the required knowledge, skills, and experience or are supported to develop these.

### The Strategic Lead for Safeguarding will:

- Be the point of escalation for serious safeguarding incidents, concerns or whistleblowing, reporting to the CEO. Ensure that the CEO, Safeguarding Trustee and Chair of Trustees is made aware of any serious safeguarding incidents or concerns that relates to GLT
- Ensure this policy is kept up to date by conducting an annual review, or sooner as required if legislation changes or serious incidents occur
- Liaise with external statutory agencies as required

- Ensure any needs for resources are highlighted at budget setting to maintain robust standards of safeguarding across GLT
- Call for audits of qualitative and quantitative data (either internal or external) when they're needed
- Learn from case reviews locally and nationally, to improve your organisation's policies, procedures and practices
- Be a point of contact for employees or volunteers if someone wishes to complain about a lack of action in relation to safeguarding concerns
- Support the Trustees in developing their individual and collective understanding of safeguarding.

**The Designated Safeguarding Leads will:**

- Champion safeguarding throughout the organisation.
- Listen and offer advice and support to all employees, workers and volunteers when needed
- Ensure employees and volunteers report and record their concerns appropriately on the GLT's Safeguarding Concern Form on Beacon on the same working day, factually, timed, dated & signed, including job role
- Liaise with statutory agencies and / or the police in relation to safeguarding referrals and co-operate with any subsequent requests for information or action from any agencies. Attend meetings, activities, projects to engage with employees, volunteers and participants to understand safeguarding on the ground
- Support regular safeguarding updates for employees, volunteers and participants.

## Safeguarding Procedure

### 1. Expectations

**Regardless of role, all employees and volunteers will** work to the highest standards of safeguarding practice, taking into account any specific issues listed below which are included in their work.

Everyone involved with GLT will:

- Treat others with respect, fairness and dignity at all times, and expect to be treated in the same way
- Keep their private and professional relationships with participants and the public separate, including when using social media
- Have no personal contact with any participants and/or their families, with whom they work professionally
- Declare any conflicts of interest between their duties and personal interests, financial or otherwise
- Ensure their line manager knows, whenever they are lone working or making home visits
- Exercise caution when discussing sensitive issues with participants; especially children or adults at risk
- Report any safeguarding or welfare concerns without delay
- Report any safeguarding or welfare concerns about the behaviour of colleagues directly to the relevant Operational Lead for Safeguarding without delay.
- Treat and always handle safeguarding information securely, when storing, sharing and accessing the information. The access and sharing of safeguarding information must be on a strict need to know basis. The Data Protection Policy allows for sharing, disclosure and transfer of data where there is a legal reason for doing so
- Report all gifts to their line manager
- Speak with their line manager immediately if they consider their work may put them into a position that might lead to an allegation of professional misconduct
- Exercise their right to whistle blow if they are concerned safeguarding issues are being mismanaged or ignored within GLT
- Maintain confidentiality at all times, including with family and friends.

### 2. Whistleblowing

All employees and volunteers will know how to “whistle-blow” externally in line with GLT’s Whistleblowing Policy if they have concerns that GLT is not addressing safeguarding issues appropriately or they feel unable to raise the matter internally. They can do this by referring directly:

- To the Police if a crime has, or may have been committed;
- to local [Adult Social Care Services](#) or [Child Social Care Services](#)
- To the Local Authority Designated Officer (LADO) for concerns about any employee, worker or volunteer working with under 18’s



- to the Charity Commission for England and Wales by email **[whistleblowing@charitycommission.gov.uk](mailto:whistleblowing@charitycommission.gov.uk)** or Tel: 0800 055 7214 or,
- for CQC services, the [CQC direct](#), **[enquiries@cqc.org.uk](mailto:enquiries@cqc.org.uk)** or Tel: 03000 616161 or via the [Speak Up](#) helpline Tel: 08000 724 725

### 3. Responding to Child and Adult Safeguarding Concerns

Employees or volunteers may become concerned by:

- Their own observations
- Being told by another person that they have concerns
- What the child or adult says
- What others say
- Any complaints, including anonymous.

### 4. Handling Disclosures

A disclosure may be made verbally or by the behaviour of a child, young person or an adult at risk and it is important for everyone to remember the following:

- Keep calm
- Reassure them that they were right to tell you
- Consider who else can hear
- Listen carefully
- Do not ask leading questions or promise confidentiality
- Factually record (on the same working day) the child/adult's words as accurately as possible, on the Safeguarding Form on Beacon.

### 5. Actions to be Taken

**If an employee or volunteer has a concern, they should:**

- Immediately assess if the person affected is safe from any further harm
- In an emergency, or if it is felt someone is in immediate danger, call 999, telling the emergency service that the person is a person with care and support needs where applicable
- Inform their Designated Safeguarding Lead (or the Strategic/Deputy Safeguarding Lead if no other Designated Safeguarding Lead is available or a Safeguarding Lead is implicated. Additionally, if the Strategic Lead for Safeguarding is implicated, the C.E.O should be contacted
- Not investigate
- Preserve any evidence (if relevant)
- Factually record their concerns in writing as soon as possible, on the same day, on the Safeguarding form on Beacon, co-operate with any following requests for action from the Designated Safeguarding Lead or external statutory agencies. These records will be recorded factually with only the information already known, by the person with the concern and will include their name, job role, service and be timed and dated
- Maintain confidentiality at all times, including with colleagues (inform colleagues only on a need to know basis), family and friends.



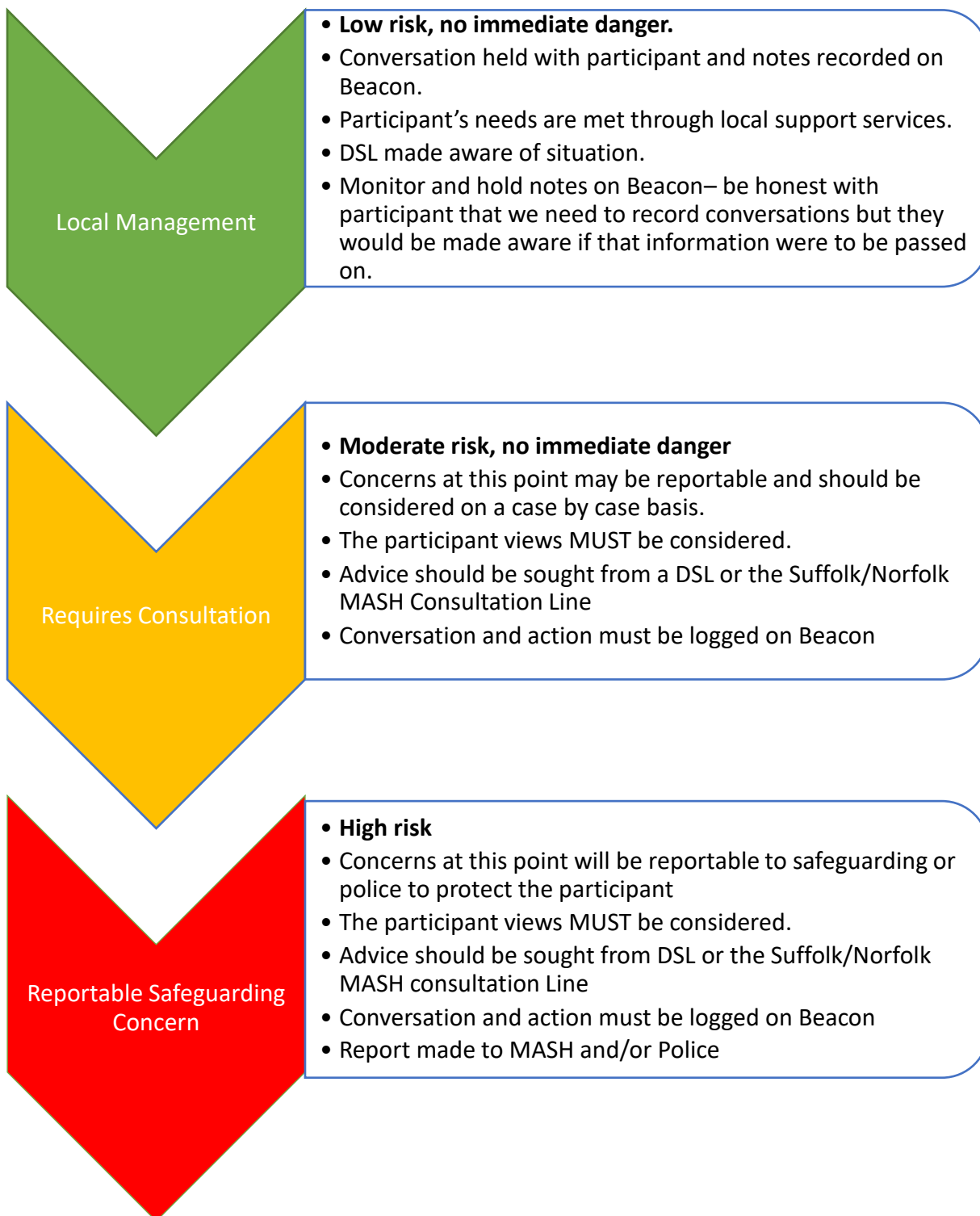
**The Designated Safeguarding Lead (or Strategic Lead/CEO) will:**

- In the case of an emergency, or if it is felt someone is in immediate danger, contact the Police on 999.

They will also:

- Ensure the person with the direct concern has factually recorded their concerns in writing and on the same day on Beacon
- If CYP related, will inform the school/other commissioner/ key contact
- If home school educated will inform via the [Home education policies and procedures - Norfolk County Council](#) [Elective Home Education \(EHE\) - Suffolk County Council](#)
- Maintain an accurate chronology of all discussions held and actions taken on Beacon
- Inform the Strategic Lead for Safeguarding (unless they are implicated)
- Attend multi-agency meetings to discuss the case if requested
- Liaise with the statutory agencies with regards to report writing, offering support and services where relevant
- Co-operate with any Social Service or police investigation.

**When responding to a concern GLT employees should evaluate the level of risk presented by a concern and carry out appropriate action based on the following traffic light guidance:**



At Appendix 2 you will find the safeguarding process map for concerns raised in Suffolk and in Norfolk, and the links that can be used at each stage of a safeguarding concern.

## 6. Safeguarding Allegations and Complaints against GLT employees or volunteers

Designated safeguarding leads should immediately pass any allegations relating to members of employees or volunteers to the CEO and Strategic Safeguarding. When there is a safeguarding concern, complaint or allegation about the behaviour of any employee or volunteer the CEO will oversee the safeguarding process with support from the Strategic Safeguarding lead and will:

- For child abuse allegations against an employee, worker or volunteer, the Local Authority Designated Officer (LADO) who will co-ordinate the next steps
- For adult abuse allegations against an employee, worker or volunteer in a Position of Trust (PoT) Adult Social Services who will co-ordinate the next steps
- Consider possible suspension of the employee or volunteer;
- For those who have criminal records checks at Enhanced DBS level refer to any relevant [professional regulators](#) including the Disclosure and Barring Service within 5 days of the closure of the case.

This includes, but is not limited to an individual who has:

- Behaved in a way that has harmed, or may have harmed a child or adult at risk
- Possibly committed a criminal offence against or related to a child or adult at risk; or
- Behaved towards a child or adult at risk in a way that indicates they may pose a risk of harm to vulnerable groups.

The decision regarding the Outcome is based on the "Balance of Probabilities."

- Substantiated: there is sufficient identifiable evidence to prove the allegation
- False: there is sufficient evidence to disprove the allegation
- Malicious: there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false
- Unfounded: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.
- Unsubstantiated: there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

## 7. External party safeguarding referrals

If it is known that an external agency (e.g. Ambulance service, Police, NHS or any other organisation) or a private individual (e.g. family, friend or member of the public) have raised a local authority safeguarding referral relating to a participant, an internal safeguarding log entry on Beacon is required to be

completed in line with the GLT's entry requirements. This is to ensure that GLT is aware of all safeguarding referrals that could affect the participant and understand how we provide support to this participant moving forward. As well as adjust or amend any risk assessments the organisation may have.

## 8. Children or young people referrals

When there is a referral that relates to a child or young person there should be specific consideration as to the employee who is completing the referral as identified on the Designated Safeguarding Leads list on Beacon, this is to ensure only employees who are appropriately trained complete this. The purpose of this is to maximise the understanding and effectiveness of the referral and process moving forward to best support the child or young person involved.

## 9. Support for employees

It is the line managers responsibility **(supported by GLT's senior management)** to ensure that there is appropriate welfare support in place to support all employees involved within any safeguarding referrals and post incident support. This is to help mitigate against any adverse effects of employees being involved within safeguarding referrals.

### Preserving evidence (if needed)

- What is done or not done, in the time prior to the police arriving on the scene, may make all the difference to their investigation
- Ensure that the victim and the alleged perpetrator do not come into contact with each other once the allegation has been made, this should prevent any cross contamination of evidence
- Secure the scene and do not allow anyone to enter until the police arrive, with the exception of medical employees if the victim requires medical attention
- To enable the police to investigate effectively it is crucial that evidence is preserved, if in doubt consult the police on the telephone prior to their arrival
- When dealing with allegations of financial abuse or other irregularities, documentation should not be removed or altered in any way
- Where possible, leave things as they are, if anything has to be handled, keep this to a minimum, do not clean up, do not touch anything you do not have to
- Leave weapons where they are unless they are handed over, if so, take care not to destroy fingerprints if possible
- Do not wash anything or in any way remove blood, fibres etc
- Preserve the clothing and footwear of the victim, handle them as little as possible
- Note in writing the state of the clothing of both the alleged victim and the alleged perpetrator, note injuries in writing, make written notes the conditions and attitudes of the people involved in the incident, this should be done as soon as practicably possible

- The police will decide how to preserve any obvious evidence such as footprints or fingerprints or any other evidence, which may have been left behind by the suspect
- If an allegation of sexual abuse is disclosed days after the alleged offence, it may still be possible to collect forensic evidence, do not assume that it is too late, let the police decide
- OR IN CASES when the alleged victim does not want to involve the police further contact the local [Sexual Assault Referral Centre \(SARC\)](#) for advice, help and support

**Important:** It is important to remember that any concern may potentially lead to legal action at any point. The reliance a court will place upon the information obtained from the people involved (particularly from a child) may be reduced if it is known that someone has discussed the issues with the child or adult outside the normal multi-agency investigation process.

All employees and volunteers are expected to report to their Designated Safeguarding Lead. This is to ensure the correct procedures are followed in line with the policy, records are kept, risk assessed and all cases are monitored by the relevant managers. Consideration must be given to service specific requirements to report to external commissioners.

## **10. Responding to eSafety Concerns**

### **Safeguarding and modern technology.**

All safeguarding concerns will be dealt with in line with this policy, particularly in terms of referral and recording procedures on Beacon

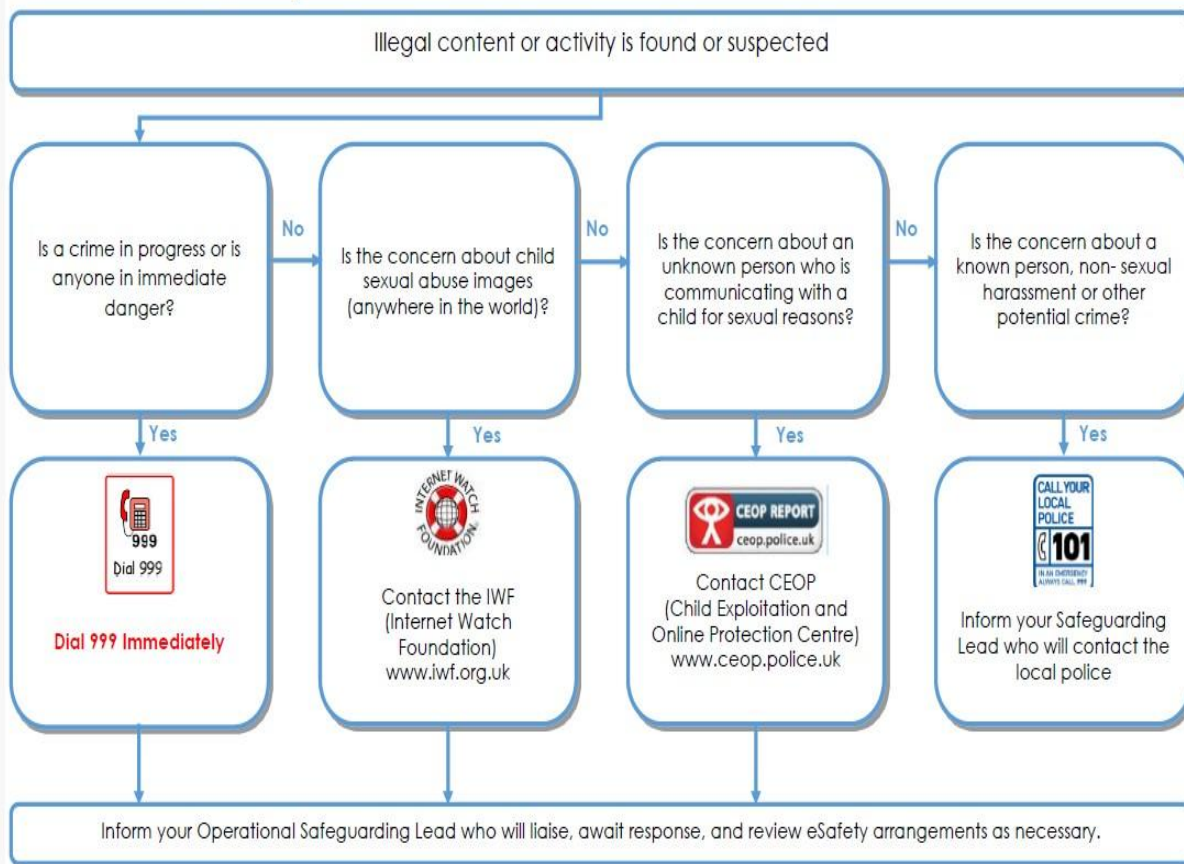
### **All employees, workers and volunteers will:**

- Act professionally and within the law at all times
- Only interact with “at risk” groups with whom they come into contact at work via official GLT media, not personal
- Report any concerns without delay in line with the eSafety concerns: flowchart for referral below and then notify the Designated Safeguarding Lead of their concerns and actions without delay
- Record their concerns and actions on the Safeguarding Concern Form on Beacon; ensuring it is timed and dated, including name and job role.

### **Examples of things that may give cause for concern include an employee or volunteer who:**

- Befriends members of the public who they work with; especially children, young people and adults at risk, by their personal phone, online, by messaging and social media etc
- Views adult pornography, extremist or other offensive or illegal websites and /or material at work
- Views child sexual abuse images at any time
- Promotes discrimination, illegal acts or racial or religious hatred of any kind

## 5. Flowchart for eSafety Referrals



## 11. Safer Recruitment

GLT has robust procedures in place for safer recruitment.

GLT adheres to all its legal responsibilities under [Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975 \(Amendment\) \(England and Wales\) Order 2020](#), the [Police Act 1997](#), [Safeguarding Vulnerable Groups Act 2006](#), [Protection of Freedoms Act 2012](#) and amendments, the [DBS Code of Practice](#) and its Policy on the Recruitment of Ex-offenders.

**The Director of Finance and Support Services is responsible for ensuring that all GLT employees and volunteers will:**

- Be given job / role descriptions with a clear outline of safeguarding expectations and duties as relevant to their roles
- Be recruited as safely as possible, proportionate to their role and contact with at risk groups
- Undertake induction training within 6 months?? of joining GLT relevant to their role; including signing to say they have read, understood and will comply with the safeguarding policy

- Undertake / attend child and adult safeguarding training, as relevant to their roles.

**Those who recruit will ensure they have recruited as safely as possible by:**

- Strictly adhering to the GLT's Procedures for Recruitment and Disclosure and Barring Service Criminal Records Checks
- Requesting [self-declarations](#) from Trustees, the CEO and other eligible senior managers to confirm they are not disqualified from holding such posts
- Ensuring all advertisements include a statement which confirms GLT's commitment to safeguarding and safer recruitment where applicable
- Requesting written declarations, as appropriate, for enhanced DBS, basic or non-DBS posts following [NACRO guidance](#)

**Recruitment of ex-offenders**

- External professional employment advice from Social Care Services (or the LADO for relevant child information) and / or [NACRO](#) will be sought when needed.

**Post-recruitment**

- Induction and probationary periods, where relevant, for all employees and volunteers will facilitate the development of understanding and grounding in the safeguarding policies, ethos and culture of GLT
- All employees and volunteers will take part in supervisions/ 121's throughout the year
- All employees and volunteers are offered support when involved with professional safeguarding issues via one- to-one meetings with their line manager as appropriate. They may all seek further support from either their Designated Safeguarding Lead or the Strategic Lead/Deputy for Safeguarding if needed.

**12. Consideration of Safeguarding**

All employees will:

- Be alert to the needs of those who need extra support and are demonstrating a change in those needs
- Refer those changes to the Manager of the service who will liaise with the external agencies as relevant
- Adhere to robust risk management procedures for all participants who have been assessed with medium complex needs/support needs.
- Follow GLT's Incident procedures when Police, Emergency services and/or external agencies such as social services are contacted because of an alleged, or actual, assault or adult protection incident; participants presenting with self-harm or suicidal thoughts. These incidents will be reviewed by the relevant Manager and other GLT management as relevant

- Liaise and exchange of information with other agencies including the police, Social Services, other Local Authority officers, the local Health Authority, other partners and stake holders as relevant.

### **13. Photography and media**

- No photography or video will be taken of individual or small groups of children, young people or members of the public without advising them, their parents (if under 16 or under 18 if they lack mental capacity) or those with a Health and Welfare Lasting Power of Attorney (LPA); of the purposes of such images and seeking written signed consent using the GLT Photography and Filming Consent Form
- In the case of any adult who lacks capacity and has not appointed an LPA, no consent can be given, so no images should be taken
- When children, or adults who lack capacity, are associated with a partner organisation e.g. a school or a community group, it is that organisation's responsibility to seek permission and inform GLT if there are issues
- Public crowd photography will not be taken unless there is prominent signage by the entrance to the venue, and at the location where filming is taking place, detailing the purpose of such imagery and giving people the option to opt out
- Only authorised GLT devices, phones or cameras will be used to take any photographs or videos
- A GLT official photographer may be commissioned to carry out professional photography or filming
- All official press and other photographers will sign in to any of GLT venues events with their official ID being shown
- No pictures of individual or small groups of children, young people or any members of the public will be published in any medium in a way that their names can be identified
- No images of children or adults in a state of undress will be taken
- All images of people will be taken in open public areas
- All images will be uploaded onto the secure area of sharepoint and deleted from any mobile device
- Any unused images due to lack of quality etc. are deleted within 2 days

### **14. Working with people from partners who are regulated settings including schools, colleges, health providers, GP practices, prisons and social care settings**

- When there are concerns about the welfare of a child, young person or adult at risk, the employee with the concern should contact that organisation's Lead or Deputy for Safeguarding
- The concern should be recorded on the GLT'S Safeguarding form on Beacon
- The person with the concern should then inform the Designated Lead for Safeguarding that they have raised a concern, and
- In cases where there are safeguarding concerns about the school, college, health provider, GP Practice, prison or social care setting, then employees,

should refer to their Designated Safeguarding Lead who will refer to the relevant agencies in the usual way

## **15. Confidentiality, Consent, Information Sharing and Record Keeping**

- GLT is mindful of its legal duties under the Data Protection Act 2018 and General Data Protection Regulation (UK GDPR) and has robust data management, IT security, privacy, record keeping and retention, and policies in place
- Personal information about children, young people, adults at risk and/or their families will usually be confidential and should not be disclosed to a third party without the consent of the subject
- Consent will be sought for those under 16 from their parent/s (or all under 18's if they lack mental capacity) or those with a Health and Welfare Lasting Power of Attorney (LPA); However, the law allows for the disclosure of confidential information where this is necessary to safeguard a child, young person or adult at risk; or if a crime has, or may have, been committed, or it is in the public interest
- Disclosure of confidential information must be justifiable, according to the particular facts of the case and must be limited to those people who need to know in order to take appropriate action.

### **Sharing information without consent may be justified, if, for example:**

- The person lacks the mental capacity to make that decision, and sharing the information is judged to be in their best interests – this must be properly explored and recorded in line with the Mental Capacity Act
- The person or other people are, or may be, at risk, of harm
- The person has the mental capacity to make that decision but they may be under duress or being coerced
- The risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral
  - A court order or other legal authority has requested the information.

## **Appendix 1**

### **Definitions & Recognising Possible Signs of Child/Adult Abuse**

For the purposes of this policy:

**Safeguarding** is the overarching term to describe what Green Light Trust has put in place to prevent children and at-risk adults being harmed and how it will respond when, despite every best effort, harm does happen.

**A child/ young person** is any person under the age of 18 years.

**Promoting the welfare of children and young people is:**

- Protecting children and young people from maltreatment
- Preventing impairment of children's health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

**An adult at risk** is someone who is aged 18 years or over and who is;

- In need of care and support, and;
- Experiencing or being at risk of abuse and neglect and;
- As a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

**Serious Incidents and Events** are those that occur that result in significant harm, for example:

- Personal injuries or harm
- Loss of money
- Radicalisation

Such incidents and events could be reported to the Charity Commission by the Trust's Company Secretary in line with the Charity Commission's Serious Incident Reporting guidance

#### **What is abuse?**

**Abuse** of a child, young person or adult at risk can take many forms and, if they are unsure, all employees and volunteers should consult their Operational Lead for Safeguarding, who in turn, may contact local social care services for advice.

#### **Children and Young People**

**1. Emotional Abuse:** Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities

to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone; may feature age or developmentally inappropriate expectations being imposed on children.

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

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

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

**4. Sexual Abuse:** Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**5. Other issues or circumstances that may involve, or give rise to, abuse include:**

**a. Breast ironing** is also known as breast flattening, is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear.

**b. Child abuse linked to faith or belief** which includes belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or

leading them astray. It includes neglect, physical, sexual and/or emotional abuse.

**c. Children under 16 years old living away from home** with someone who is not a close relative. If this happens for more than 28 days, their parent/carer (or anyone else if this has not been done, or not possible) need to register the private fostering arrangements with the local authority.

**d. Children going missing** from home, for whatever reason, as they may be exploited or trafficked.

**e. Child Sexual exploitation** - Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

**f. Child trafficking** - Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. There are a number of cases of minors being exploited in the sex industry. Trafficked children may not only be deprived of their rights to health care, freedom from exploitation and abuse, but may also be denied access to education.

**g. Coercive behaviour** in the family or in a person's intimate relationships is a criminal offence. Controlling or coercive behaviour does not relate to a single incident, it is a purposeful pattern of behaviour, which takes place over time in order for one individual to exert power, control or coercion over another. It is a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

**h. Concealed** pregnancy when a mother of any age does not seek medical help or support so the unborn baby may be at risk of harm as a result of not accessing maternity services.

**i. County lines** is when gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, use dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

**j. Domestic abuse** when an individual exercises control over another when they are “personally connected”. It takes many forms and can include neglect, physical, sexual, financial, property, coercive and / or emotional abuse. When under 16s are involved, it is regarded as child abuse

**k. eSafety** - when children, young people or adults at risk may be targeted online for sexual abuse, financial gain, radicalisation and / or other crimes;

**l. Female genital mutilation** - FGM is a criminal offence – it is child abuse and a form of violence against women and girls, and therefore should be treated as such. FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

**m. Forced marriage** - Forced marriage is a criminal offence – it is a form of child/ adult/ domestic abuse and has to be treated as such; ignoring the needs of victims should never be an option. Forced marriage affects people from many communities and cultures, so cases should always be addressed using all of your existing structures, policies and procedures designed to safeguard children, adults with support needs and victims of domestic abuse.

**n. Modern slavery** - Modern slavery is a complex crime that takes a number of different forms. It encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. Victims may be sexually exploited, forced to work for little or no pay or forced to commit criminal activities against their will. Victims are often pressured into debt-bondage and are likely to be fearful of those who exploit them, who will often threaten and abuse victims and their families. All of these factors make it very difficult for victims to escape

**o. Non-recent abuse**, there is no time limit on reporting these offences and an alleged perpetrator may continue to present a risk to children, and if the information is not shared, there is potential for children to remain at risk of harm and further abuse. It may also be the case that there are other victims

**p. Peer abuse** including bullying as children can be abusers too.

**q. Radicalisation** - PREVENT is about stopping people from being radicalised and becoming terrorists or supporting terrorism. Some people may be vulnerable to being drawn into terrorism if they lack self-esteem or are victims of bullying or discrimination. Indicators of this can be hard to recognise in both children and adults and may include: isolating themselves from family and friends, talking as if from a scripted speech, unwillingness or inability to discuss their views, a sudden disrespectful attitude towards others, increased levels of anger and /or an increased secretiveness, especially around internet use.

**r. Violent extremism** is when groups or individuals who condone violence as a means to a political end is a particular risk for some children. Any concerns should be reported.

**s. Young unaccompanied asylum seekers** who have no responsible adults with them.

### **Adults at Risk**

Abuse is defined as a violation of an individual's human and civil rights by another person or persons. It may involve a single or repeated act or omission occurring within a personal or professional relationship where there is an expectation of trust which causes harm to an adult at risk.

### **Significant harm includes:**

- Ill treatment (including sexual abuse and forms of ill treatment that are not physical);
- The impairment of, or an avoidable deterioration in, physical or mental health;
- The impairment of physical, emotional, social or behavioural development.

In addition to the categories defined above which also relate to adults, behaviours which amount to abuse include:

- I. **Discriminatory Abuse:** Racism, sexism or acts based on a person's disability, age or sexual orientation. It also includes other forms of harassment, slurs or similar treatment such as disability hate crime.
- II. **Domestic Abuse:** Psychological, physical, sexual, financial, emotional abuse, coercive behaviour in the family or intimate relationships, and so called 'honour' based violence.
- III. **Financial or Material Abuse:** Theft, fraud, exploitation, pressure in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. It can be online, by phone or face to face.
- IV. **Forced Marriage:** When one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In cases of adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.
- V. **Hate and "Mate" Crime:** A form of hate crime in which an "at risk" person is manipulated or abused by someone they believed to be their friend.
- VI. **Hoarding:** Hoarding disorder is a persistent difficulty in discarding or parting with possessions. A person with a hoarding disorder may experience distress at the thought of getting rid of the items or simply be unable, either physically or through other health related factors, to get rid of items

- despite an acknowledgment that changes need to be made. They will have an excessive accumulation of items, regardless of actual financial value
- VII. **Modern Slavery:** Encompassing slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment;
- VIII. **Neglect or Acts of Omission:** Ignoring medical or physical care needs, failing to provide access to appropriate health, social care, welfare benefits or educational services, withholding the necessities of life such as medication, adequate nutrition and heating.
- IX. **Organisational Abuse:** Neglect and poor care practice within a care setting such as a hospital or care home or in relation to care provided in someone's own home ranging from one off incidents to on-going ill-treatment. It can be neglect or poor practice as a result of the structure, policies, processes and practices within a care setting.
- X. **Physical Abuse:** Hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
- XI. **Psychological Abuse:** Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- XII. **Self-Neglect:** Covers a wide range of behaviour including neglecting to care for one's personal hygiene, health or surroundings and behaviour such as hoarding.
- XIII. **Sexual Abuse:** Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- XIV. **Suicidal ideation:** means having thoughts, ideas, or ruminations about the possibility of ending one's life. It is not a diagnosis, but is a symptom of some mental disorders and can also occur in response to adverse events without the presence of a mental disorder.

## 6. Recognising Possible Child/Adult Abuse

The following behavioural signs *may* be indicators of child/young person abuse, but care should be taken in interpreting them in isolation.

### CHILD ABUSE

#### Physical signs

- Any injuries, bruises, bites, bumps, fracture, etc. which are not consistent with the explanation given for them.

- Injuries which occur to the body in places which are not normally exposed to falls, rough games, etc.
- Injuries which appear to have been caused by a weapon e.g. cuts, welts, etc.
- Injuries which have not received medical attention.
- Instances where children/young people are kept away from the group inappropriately or without explanation.
- Self-mutilation or self-harming e.g. cutting, slashing, drug abuse.

### **Emotional signs**

Changes or regression in mood and behaviour, particularly where a child/young person withdraws or becomes clinging. Also depression/aggression.

- Nervousness or inappropriate fear of particular adults.
- Changes in behaviour e.g., under-achievement or lack of concentration, inappropriate relationships with peers and/or adults e.g., excessive dependence attention-seeking behaviour.
- Persistent tiredness, wetting or soiling of bed or clothes by an older child.

### **Signs of neglect**

- Regular poor hygiene
- Persistent tiredness
- Inadequate clothing
- Excessive appetite
- Failure to thrive e.g. poor weight gain, consistently being left alone and unsupervised.

### **Indicators of possible sexual abuse**

- Any direct disclosure made by a child/young person concerning sexual abuse.
- Child/Young person with excessive preoccupation with sexual matters and detailed knowledge of.
- Adult sexual behaviour, or who regularly engages in age-inappropriate sexual play.
- Preoccupation with sexual activity through words, play or drawing.

- Child/Young person who is sexually provocative or seductive with adults.
- Inappropriate bed-sharing arrangements at home.
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations.
- Other emotional signs (see above) may be indicative of sexual or some other form of abuse.

### **Domestic abuse**

Be aware that a referral must be made direct to Children's Social Care, following the reporting flowchart below, if it seems reasonable to suspect that:

- A child sees, hears, experiences or is otherwise aware of domestic abuse – i.e. that domestic abuse is part of their experience of family life. This applies regardless of whether they actually witness any particular event or are physically harmed, and
- The non-abusing parent will not be able – for whatever reason – to ensure the safety and well-being of their child without significant professional assistance and support

### **Adults Abuse Indicators**

The lists below are purely for Operational Guidance. The presence of one or more does not automatically confirm abuse. The existence of a number of the indicators may, however, suggest a potential for abuse and should therefore necessitate further assessment or scrutiny. If there is any concern at all about the possibility of abuse then advice should be sought and an alert should be submitted to Customer First without delay.

#### **Possible Indicators of physical abuse**

- History of unexplained falls or minor injuries
- Unexplained bruising – in well protected areas, on the soft parts of the body or clustered as from repeated striking
- Unexplained burns in an unusual location or of an unusual type
- Unexplained fractures to any part of the body that may be at various stages in the healing process
- Unexplained lacerations or abrasions
- Slap, kick, pinch or finger marks

- Injuries/bruises found at different stages of healing for which it is difficult to suggest an accidental cause
- Injury shape similar to an object
- Untreated medical problems
- Weight loss – due to malnutrition or dehydration; complaints of hunger
- Appearing to be over medicated

### **Possible Indicators of sexual abuse**

- A change in usual behaviour for no apparent or obvious reason
- Sudden onset of confusion, wetting or soiling
- Withdrawal, choosing to spend the majority of time alone
- Overt sexual behaviour/language by the adult at risk
- Disturbed sleep pattern and poor concentration • Difficulty in walking or sitting
- Torn, stained, bloody underclothes
- Love bites
- Pain or itching, bruising or bleeding in the genital area
- Sexually transmitted urinary tract/vaginal infections
- Bruising to the thighs and upper arms
- Frequent infections
- Severe upset or agitation when being bathed/dressed/undressed/medically examined
- Pregnancy in a person not able to consent

### **Possible Indicators of psychological abuse**

- Ambivalence about carer
- Fearfulness expressed in the eyes; avoids looking at the carer, flinching on approach
- Deference
- Overtly affectionate behaviour to alleged source of risk
- Insomnia/sleep deprivation or need for excessive sleep
- Change in appetite
- Unusual weight gain/loss

- Tearfulness
- Unexplained paranoia
- Low self-esteem
- Excessive fears
- Confusion
- Agitation

### **Possible Indicators of financial abuse**

- Unexplained or sudden inability to pay bills
- Unexplained or sudden withdrawal of money from accounts
- Person lacks belongings or services, which they can clearly afford
- Lack of receptiveness to any necessary assistance requiring expenditure, when finances are not a problem – although the natural thriftiness of some people should be borne in mind
- Extraordinary interest by family members and other people in the adult at risk's assets
- Power of Attorney obtained when the adult at risk is not able to understand the purpose of the document they are signing
- Recent change of deeds or title of property
- Unpaid carer or support worker only asks questions of the worker about the user's financial affairs and does not appear to be concerned about the physical or emotional care of the person
- The person who manages the financial affairs is evasive or uncooperative
- A reluctance or refusal to take up care assessed as being needed
- A high level of expenditure without evidence of the person benefiting
- The purchase of items which the person does not require or use
- Personal items going missing from the home
- Unreasonable and /or inappropriate gifts

### **Possible indicators of modern slavery**

- Marked isolation from the community
- Seeming under the control and influence of others and relying on others to communicate on their behalf

- Restricted freedom of movement
- Unusual travel times
- Unfamiliarity with the local neighbourhood
- Signs of physical or psychological abuse such as looking malnourished or unkempt or appearing withdrawn
- Poor living conditions such as unhygienic, overcrowded accommodation or living and working at the same address
- Few or no personal effects and no identification documents
- Reluctance to seek help often characterized by hesitance to speak to strangers or professionals and limited eye contact
- Fear of law enforcement

This list is not exhaustive. The signs of slavery are often hidden, making it difficult to recognise victims.

### **Possible Indicators of discriminatory abuse**

- Hate mail
- Verbal or physical abuse in public places or residential settings
- Criminal damage to property
- Target of distraction burglary, bogus officials or unrequested building/household services
- Discriminatory abuse can manifest itself as the other types of abuse; physical or sexual abuse/ assault, financial abuse/ theft, neglect, psychological abuse.

### **Possible Indicators of Organisational Abuse**

- Organisations may include residential and nursing homes, hospitals, day centres, sheltered housing schemes, group or supported housing projects. It should be noted that all organisations and services, whatever their setting, can have institutional practices which can cause harm to adults at risk.
- It may be reflected in an enforced schedule of activities, the limiting of personal freedom, the control of personal finances, a lack of adequate clothing, poor personal hygiene, a lack of stimulating activities or a low quality diet – in fact, anything which treats the person concerned as not being entitled to a 'normal' life.

The distinction between abuse in institutions and poor care standards is not easily made and judgements about whether an event or situation is

abusive should be made with advice from appropriate professionals and regulatory bodies.

### **Possible Indicators of neglect**

- Poor condition of accommodation
- Inadequate heating and/or lighting
- Physical condition of person poor, e.g. ulcers, pressure sores etc.
- Person's clothing in poor condition, e.g. unclean, wet, etc.
- Malnutrition
- Failure to give prescribed medication or appropriate medical care
- Failure to ensure appropriate privacy and dignity
- Inconsistent or reluctant contact with health and social agencies
- Refusal of access to callers/visitors.

### **Wilful Neglect and Ill-Treatment**

Most of the indicators of the other types of abuse may also indicate willful neglect or ill treatment if the adult at risk lacks the mental capacity to make the relevant decisions so these two offences should always be considered with each allegation of abuse in such circumstances.

### **Possible indicators of self-neglect**

- Living in grossly unsanitary conditions which endangers health and wellbeing
- Grossly inadequate self-grooming or personal care and/ or inappropriate or inadequate clothing.
- Maintaining an untreated illness, disease or injury or lacking eyeglasses, dentures, hearing aids, etc.
- Being malnourished or dehydrated to such an extent that, without intervention, the adult's physical or mental health is likely to be severely impaired
- Creating severely hazardous living conditions that will likely cause serious physical harm to the adult or others or cause substantial damage to or loss of assets, such as severe hoarding, improper wiring, lack of indoor plumbing or heating, infestation
- Managing ones assets in a manner that is likely to cause substantial damage to or loss of assets

## Radicalisation

Example indicators that an individual may be engaged with an extremist group, cause or ideology include:

- Increasingly spending time in the company of other suspected extremists
- Changing their style of dress or personal appearance to accord with the group
- Their day to day behaviour increasingly centred around an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)
- Attempts to recruit others to the group/cause/ideology; or
- Communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to use violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- Using insulting or derogatory names or labels for another group
- Speaking about the imminence of harm from the other group and the importance of action now
- Expressing attitudes that justify offending on behalf of the group, cause or ideology
- Condoning or supporting violence or harm towards others  
Plotting or conspiring with others.

Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include

- Having a history of violence
- Being criminally versatile and using criminal networks to support extremist goals
- Having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction)
- Having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

NB. The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be



assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

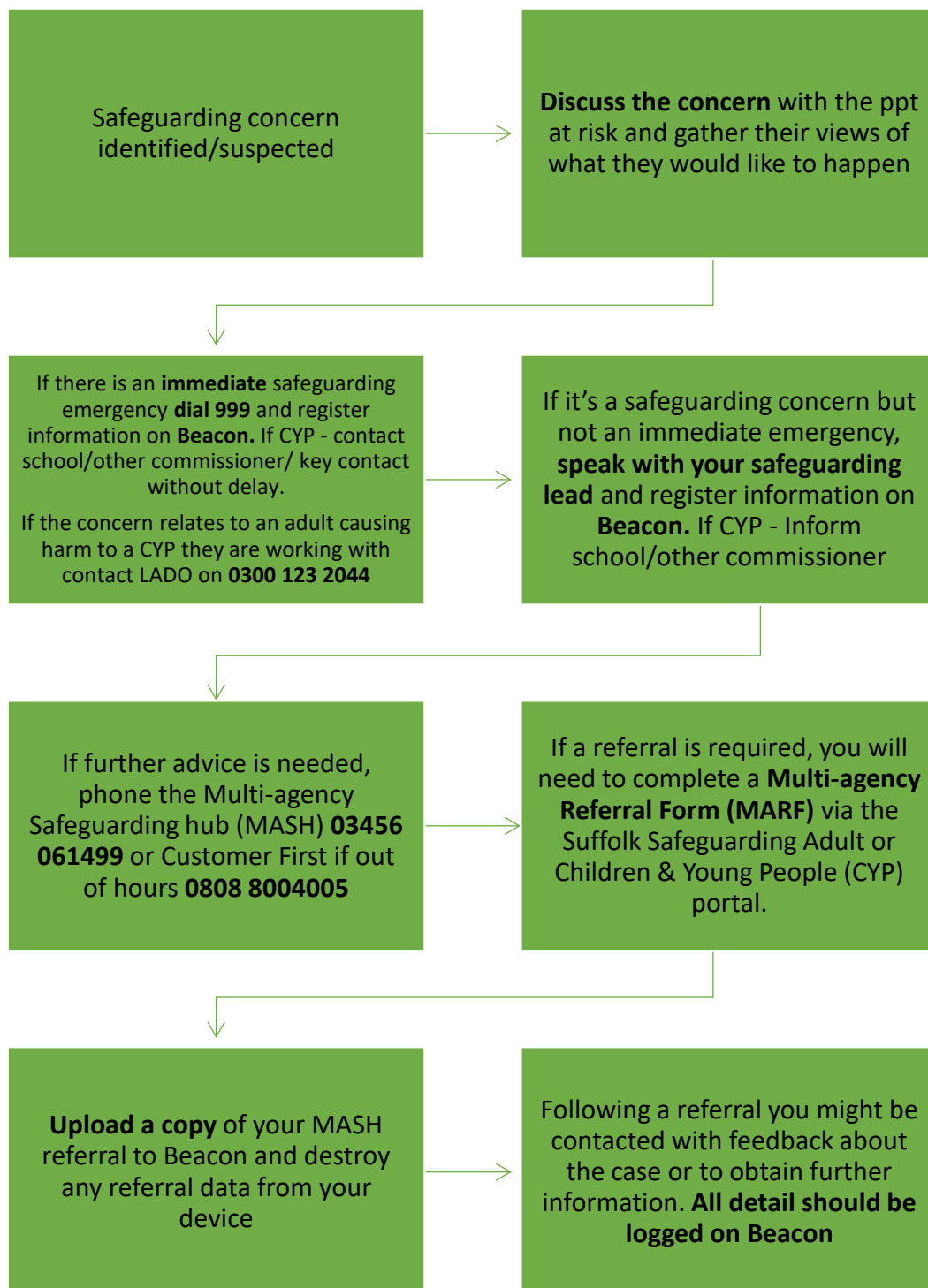
- The Safeguarding lead may make referrals in accordance with [Prevent duty - Norfolk Schools and Learning Providers - Norfolk County Council](#) or [Prevent duty— Suffolk Safeguarding Partnership](#) and may represent our setting at Channel meetings as required

## Appendix 2 Safeguarding Process Maps

### Suffolk - Children, Young People and Vulnerable Adults

#### CYP Portal - Suffolk County Council

#### Adult Portal - Suffolk County Council



## Safeguarding Process Map Norfolk - Children, Young People and Vulnerable Adults

[Portal - CYP Norfolk County Council](#)

[Portal - Adult Norfolk County Council](#)

