

SAFEGUARDING POLICY

Safeguarding Policy Statement

Shoreditch Trust works with children, vulnerable young people and adults at risk in a variety of ways and is committed to providing a safe, positive and friendly environment to children and adults at risk. We have a statutory and moral duty to ensure and promote the welfare of these groups regardless of race, disability, gender, age, sexual orientation, religion and belief, gender reassignment, pregnancy and maternity, marriage and civil partnerships.

This policy extends to the treatment of all our service users, partners, volunteers, visitors, and employees of Shoreditch Trust. Shoreditch Trust abides by the legislative framework in place for safeguarding,

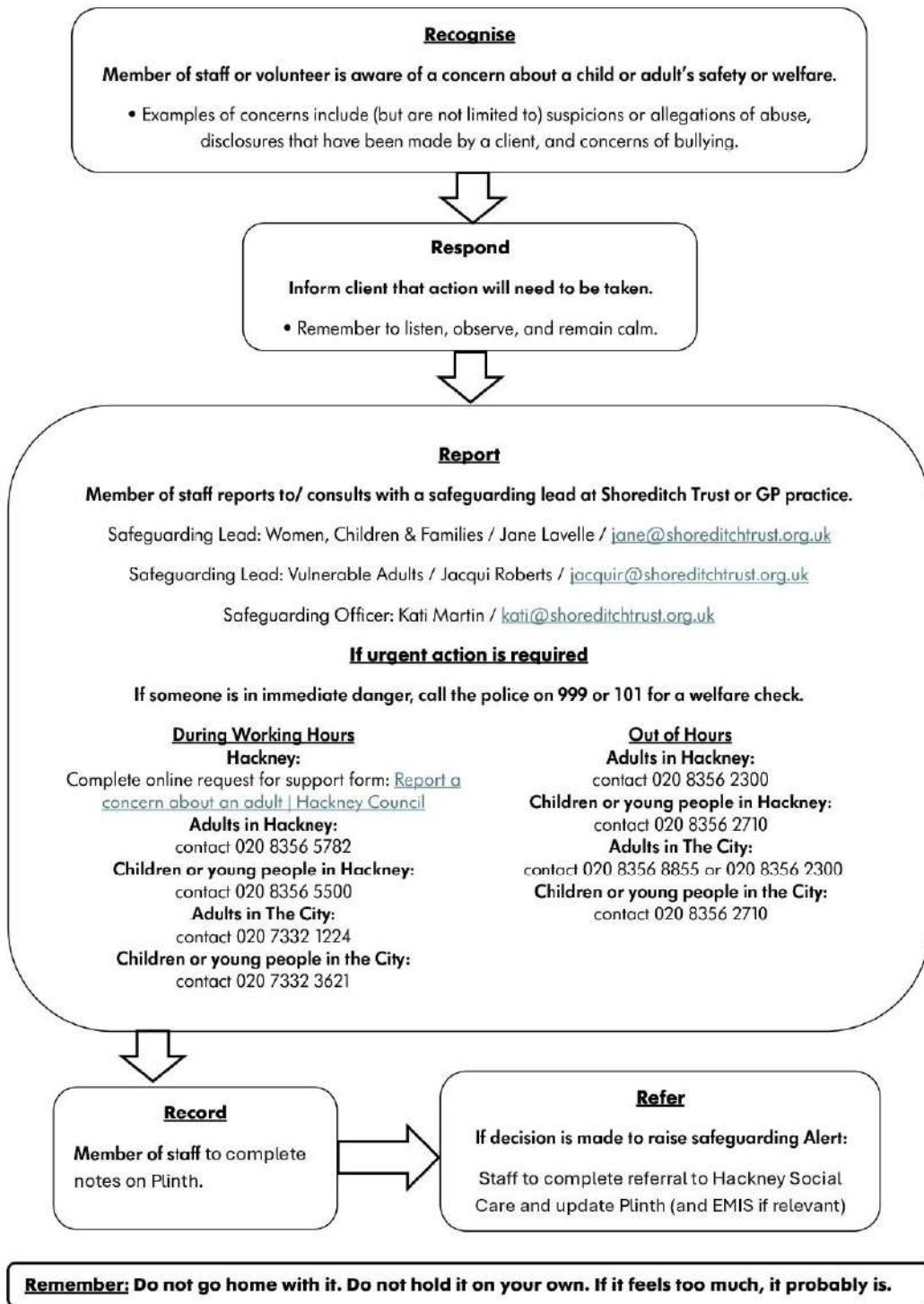
This policy includes instruction and advice on reporting and responding to allegations, national and local frameworks, advice lines and examples of best practice. Shoreditch Trust provides training in safeguarding to staff and volunteers as well as additional and specific training for project teams in areas such as personal safety, Child Sexual Exploitation, Attachment Theory Training, FGM Training, Speech, Language and Communication Needs, Anti-Racist & Anti-Discriminatory practice.

Our objectives are:

- To provide a safe and accessible working and training environment that values and respects the identity and culture of the individual;
- To create inclusive, anti-discriminatory cultures;
- To practice Anti-Racist & Anti-Discriminatory across all assessment, intervention, and organisational systems.
- To challenge discrimination and recognise how racism affects families. [\[gov.uk\]](http://gov.uk)
- To comply with all rules and regulations in the field of safeguarding;
- To proactively avoid putting service users and employees in any position whereby their safety, security and welfare are threatened;
- Where lone working is deemed necessary all appropriate safeguards are put in place including a relevant risk assessment specific to each and any such scenario
- To identify children and adults at risk who are suffering, or are likely to suffer, significant harm and to take appropriate action to ensure children and adults at risk are kept safe;

- To enable our employees to make correct decisions regarding safeguarding issues and to deal quickly with suspicions or allegations of abuse;
- To ensure the development and monitoring of our Policy is undertaken by a Safeguarding Working Group - responsible for overseeing and co-ordinating initiatives that ensure and enhance safeguarding at Shoreditch Trust;
- To monitor the effectiveness of safeguarding within Shoreditch Trust programmes.

Shoreditch Trust – Safeguarding Reporting Process



Safeguarding Policy and Procedures

Shoreditch Trust is committed to safeguarding the welfare of children and adults at risk.

Shoreditch Trust works with children and adults at risk in a variety of ways

and has developed this Policy to support staff in putting into practice this commitment. By vulnerable the Charity Commission means children or young people under 18 years of age or *adults who are in receipt of a regulated activity.¹

This policy establishes the roles and responsibilities of everyone who works or volunteers for Shoreditch Trust in relation to the protection of children and adults at risk with whom their work brings them into contact, including the children of adult staff members or service users.

This policy is based on, and reflects, the principles of both UK legislation and guidance and other relevant Shoreditch Trust policies and procedures. The approach has been developed in such a way as to aim to be consistent with 'Best Practice' within the field of child and adult at risk protection.

The key principles are:

- The welfare of the child or adult at risk is the paramount consideration.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- All staff and volunteers working at Shoreditch Trust have a responsibility to report concerns to the appropriate designated person.
- All children and adults at risk have a right to protection from harm or abuse regardless of; Race, Disability, Gender, Age, Sexual orientation, Religion and belief, Gender reassignment, Pregnancy and maternity, Marriage and civil partnerships.

It is everyone's responsibility to promote the protection of children and adults at risk. In following the policy, staff are always expected to maintain a sense of proportion, apply common sense to situations and protect the child or adult at risk's welfare as priority.

It is also Shoreditch Trust's duty to ensure that staff are never placed in situations where abuse might be alleged. It is not intended that the policy should restrict staff from normal ways of working, but staff always need to consider how an action or activity may be perceived as opposed to how it is intended.

*The definition of Regulated Activity for adults defines the activities provided to any adult as those which, if any adult requires them, will mean that the adult will be considered vulnerable at that particular time. These activities are: the provision of healthcare, personal care, and/or social work; assistance with general household matters and/or in the conduct of

¹ <https://www.gov.uk/government/publications/safeguarding-children-and-young-people/safeguarding-children-and-young-people#endnote>

the adult's own affairs; and/or an adult who is conveyed to, from, or between places, where they receive healthcare, relevant personal care or social work because of their age, illness or disability.

Principles of Good Practice

Shoreditch Trust undertakes to:

- Treat children and adults at risk with care, respect and dignity; recognise that those working for the Trust will be perceived by children and adults at risk as trusted representatives of the Trust;
- Ensure communication with children and adults at risk is open and clear; assess the risks to children and adults at risk during activities; ensure staff avoid physical contact with children and adults at risk except for reasons of health and safety, or under supervision.
- As much as is practically possible work in an open environment avoiding private or unobserved situations and encourage open communication.
- Where lone working forms part of a job description and or job function to ensure an appropriate risk assessment is in place and underpinned by a realistic and practical lone working policy which is communicated, and adhered to, by all staff.
- Treat all young people and adults at risk equally with respect and dignity
- Always put the welfare of each young person and adult at risk first.
- Maintain a safe and appropriate distance with service users (e.g. it is not appropriate for staff or volunteers to have an intimate relationship with a child or an adult at risk).
- Build balanced relationships based on mutual trust and empowering children and adults at risk to share in decision making.
- Make learning fun, enjoyable and promote fair relationships. Keep up to date with teaching skills, qualifications and insurance.
- Be an excellent role model.
- Give enthusiastic and constructive feedback rather than negative criticism.
- Keep a written record of any injury that occurs, along with the details of any treatment given.
- Raise awareness of child protection issues and equip children and adults at risk with the skills needed to keep them safe.
- Develop and implement procedures for identifying and reporting cases, suspected cases, of abuse.
- Establish a safe environment in which children and adults at risk can learn and develop.

Six safeguarding principles - Adult safeguarding: sharing information (Care Act 2014)

- Empowerment: People being 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: Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability: and transparency in safeguarding practice.

Legal framework and guideline sources:

The legislation that is relevant to the protection of children and adults at risk is as follows:

- The Children Act (2004) in England and Wales
- The United Nations Convention on the Rights of the child
- Working Together to Safeguard Children 2026
- Every Child Matters; Family Help - Targeted Early Help; Section 17 Child in Need work delivered through:
 - A multi-disciplinary team
 - One shared assessment
 - One unified Family Help plan [\[gov.uk\]](https://www.gov.uk)
- The Human Rights Act (1998)
- The Mental Capacity Act (2005)
- Serious Crime Act (2007)
- Safeguarding At risk Groups Act (2006)
- Safeguarding Children and Safer Recruitment in Education (2007)
- Rehabilitation of Offenders Act (1974)
- Education Act (2002)
- Sexual Offences Act (2003) (Notification Requirements) (England and Wales) Regulations (2012)

Other Sources include:

- Disclosure and Barring Service (DBS)
 - London Safeguarding Children Board
 - Multi Agency Public Protection Arrangements (MAPPA)
 - Supporting People Quality Assessment Framework – Core Objective 3:
 - Protection from Abuse, and associated guidelines
 - “Caring for Young People and Adults at risk” (Home Office) – guidance
 - The Care Act (2014)
 - Mental Capacity Act (2005)
 - Multi-Agency Safeguarding Arrangements (MASA)
- From 2026 there is requirement for mandatory accountability, reporting, and data-sharing enhancements.
- Accountability duties
 - Multi-agency data sharing
 - Annual reporting requirements (must evidence direct impact on children)

- Clearer expectations about safeguarding partners [\[gov.uk\]](http://gov.uk)

Scope of the procedure

This procedure applies to all staff, including senior managers, board of trustees, full-time, part-time, paid staff, agency staff, volunteers, students, permanent and temporary positions or anyone working on behalf of Shoreditch Trust coming into contact with children and adults at risk.

Performance Indicators

The application of the procedure will be monitored through the service user and staff feedback, incident, accident and complaints reporting.

Related Procedures and other documents

- Clinical Supervision Policy
- Staff Induction Policy and Procedures
- Equality and Diversity Policy
- Data Protection Policy
- Cyber Security Policy
- Health and Safety Policy
- Employee Handbook
- Volunteer Induction Pack and Volunteer Handbook
- Project Risk Assessments
- Minutes of Project, Strategic and Operational Meetings

Definitions

The terms “**child**” and “**children**” are used throughout the Safeguarding Policy and Procedures to refer to anyone under 18 years of age.

The term “**staff**” is used throughout the Policy to refer to all staff and volunteers working at the Trust.

‘**Adults at risk**’ refer to a person that has attained the age of 18 and comes under one, or more, of the following categories:

- Is in residential accommodation/in temporary accommodation/homeless
- Is in sheltered housing receives domiciliary care receives health care
- Is detained in lawful custody or is under supervision as an ex-offender
- Receives welfare service
- Requires assistance in the conduct of their own affairs (according to
- Safeguarding At risk Groups Act 2006).

In practice, the definition includes persons that:
have a learning disability

- have physical or sensory impairments
- have a mental illness including dementia or are old and frail

- are detained in custody or under a probation order
- are considered at risk and who may experience abuse due to problems with alcohol or drugs (or be at risk due to other circumstances such as being an asylum seeker).

The kinds of abuse and risk addressed by this policy include children and young people who may be at risk not just by virtue of their age, but also due to the risk of:

- Physical abuse (including actual or threatened physical attacks, verbal assault or neglect).
- Sexual abuse and exploitation (including rape, other sexual assault, underage “consensual” sex, threatened touching or inappropriate sexual remarks).
- Emotional abuse and exploitation (including any actions or comments which fail to show dignity and respect for the individual).
- Financial abuse and exploitation (including misappropriation of the personal finances of young people using our services).
- Neglect – which is a failure to properly care for the physical, social and emotional needs of the child and to protect them from harm.
- Institutional abuse where the rituals and routines mean young people have to sacrifice their lifestyle to conform with those of the institution.
- Discriminatory abuse (including that based on race, nationality, gender, sexual orientation, disability, age, personal circumstances, gender reassignment).

Responsibility for the procedure

All managers are responsible for ensuring that the Safeguarding Policy and Procedures are applied and that suitable paper records are prepared and included in personnel files.

All staff are responsible for ensuring that they understand and engage with the Safeguarding Policy and Procedures and strive to understand how their work role fits with the overall Shoreditch Trust's responsibility.

The Lead Designated Person / Designated Person(s) at Shoreditch Trust are; the project manager for Women, Children & Young People (with specialist area families, babies and new mums/DV/FGM and contextual safeguarding with specialist area young adults; the CEO and the Director of Operations (vulnerable adults).

Where issues arise, they will initially be referred to the first staff member contactable i.e. Lead Designated Person / Designated Person(s) who will oversee the matter to its satisfactory conclusion.

Where further advice and/or guidance is sought the matter will be discussed among the Safeguarding Team at Shoreditch Trust. If an issue

presents itself as there clearly being an urgent need for a referral to be made to an external agency immediately, then that will be the course of action taken. In all cases, all issues must be notified to the Lead Designated Person / Designated Person(s) at Shoreditch Trust to ensure they are captured on the central Register of Issues, which is maintained, monitored and analysed by Shoreditch Trust.

The contact details of the named Lead Designated Person / Designated Person(s) are to be made available and clearly visible on any Shoreditch Trust premises and are to be communicated to all service users and staff as part of Induction.

What does the role include?

As the designated safeguarding lead (DSL) managers act as the main source of support, advice and expertise for safeguarding in our organisation:

- Advise and support the senior leadership team in developing and establishing the Trust's approach to safeguarding.
- Play a lead role in maintaining and reviewing the organisation's plan for safeguarding.
- Coordinate the distribution of policies, procedures and safeguarding resources throughout the organisation.
- Advise on training needs and development, providing training where appropriate.
- Provide safeguarding advice and support to staff and volunteers.
- Manage safeguarding concerns, allegations or incidents reported to our organisation.

- Manage referrals to key safeguarding agencies (e.g., social services or police) of any incidents or allegations of abuse and harm. From 2026 there are stronger requirements for Section 47 investigations, To reflect enhanced expectations for direct work and multi-disciplinary strategies.
 - Stronger expectations for direct work with children
 - More robust multi-agency strategy discussions [\[gov.uk\]](https://www.gov.uk)

Recruitment and Disclosure

Shoreditch Trust has a safer recruitment policy in place - See *Shoreditch Trust Safer Recruitment Procedure* - that includes explicit reference to safeguarding children and adults at risk and adheres to the Safe Recruitment - Minimum Expectations.

Offer of employment, paid or unpaid, will be subject to DBS certificate clearance where necessary i.e., Standard, Enhanced or Enhanced with List checks if appropriate.

Relevant posts require clearance from the Disclosure & Barring Service

(DBS), this service is accessed through Hackney Learning Trust. Staff who disclose that they have been convicted of any offence relating to children or adults at risk; and/or subject to any disciplinary action or sanction relating to children or adults at risk, will not be permitted to work at Shoreditch Trust.

Shoreditch Trust's responsibilities:

Shoreditch Trust will follow the procedures set out by the London Safeguarding Children Board and take account of guidance issued by the appropriate and relevant Governmental Departments for both children and adults at risk to:

- Ensure we have a designated senior person for child protection and adults at risk who has received appropriate training and support for this role.
- Ensure every member of staff (including casual, sessional, consultancy and volunteers) knows the name of the designated senior person responsible for Safeguarding - and their role.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated senior person, or safeguarding officers, responsible for child protection and adults at risk.
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.
- Keep written records of concerns about children and adults at risk, even where there is no need to refer the matter immediately.
- Ensure all records are kept securely, locked; separate from all staff records.
- Develop and follow procedures where an allegation is made against a member of staff or volunteer.
- Ensure safe recruitment practices are always followed.

We recognise that children or adults at risk who are abused, or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. Shoreditch Trust may be the only stable, secure and predictable element in their lives. When at, or engaged through Shoreditch Trust, their behaviour may be challenging and defiant or they may appear withdrawn.

Shoreditch Trust will endeavour to support any such affected person through:

- An ethos which promotes a positive, supportive and secure environment and gives service users a sense of being valued.
- Ensuring that the service user knows that certain types of behaviour is unacceptable, but they are valued and not to be blamed for any abuse which has occurred.

- Liaison with other agencies that support the service user such as social services, Child and Adult Mental Health Service, education welfare service and educational psychology service.
- Ensuring that, where a service user on the child protection register leaves, their information is transferred to the new provider immediately and that the service user's social worker is informed.

E-Safety and E-Responsibility

Shoreditch Trust recognises that the internet plays an important part of children's, young people and adults at risk' lives for both the purposes of education and entertainment. The Safeguarding Policy and Procedures complements and supports Shoreditch Trust's Online IT Guidelines and Cyber Security Policy which set out the procedures to safeguard service users at Shoreditch Trust.

The use of technology has become an essential skill for learning, life and employment. Technologies, including email, internet and mobile phones, are increasingly essential to both individuals and to businesses. Membership or use of sites which support collaboration, conversation, and the sharing of different forms of media, such as social networking services, are common. Being able to confidently use technology opens enormous professional and personal opportunities, and supports the delivery, management and process of lifelong learning.

Safeguarding service users, and providing them with the skills to safeguard themselves when using this technology, is a vital part of the education that we give to our service users.

A key part of this process is understanding, and effectively mitigating against, the risks that exist as part of the use of technology of all types.

It is critical that we recognise that banning, blocking and filtering approaches – however appropriate to a particular learning community's own culture and circumstance – cannot be regarded as sufficient protection for individual members of that community, nor relieves the provider of a duty of care regarding safeguarding service users and employees online.

As a result of service delivery changes in response to the COVID-19 pandemic, increased online service provision, including video conferencing requires additional considerations. As a result of this, we include potential risks related to this in our risk assessments and policies.

Key Issues and Risks

In order to safeguard service users and staff from the risks associated with using technology, we will:

- Educate service users and staff to identify the risks technology can

present, and help them develop the skills they need to safeguard themselves

- Assess the risks presented by the technology they use and develop appropriate policies and guidance to mitigate against those risks
- Involve managers, staff and service users in developing acceptable use policies and establishing reporting procedures for unacceptable use.

The type of risks from technology can be categorised as:

- **Physical.** For example, poor posture (affected by furniture and seating position), eye strain (affected by length of time exposed to the screen). These risks are covered in detail as part of health and safety.
- **Contact.** The internet allows individuals to have access to certain groups, for example children and adults at risk that they would not have access to in other ways. This access can be developmental, for example online mentoring schemes. However, it can bring risks.
- **Conduct.** This is behaviour both by and towards individual service users and staff, and includes cyber bullying.
- **Content.** The exposure to inappropriate content is a risk. Illegal downloading, or uploading of content, brings risks to both the individual and the organisation and could lead to dismissal. Posting of personal information also brings risks. Individuals are often not aware of the spread, or reach and permanence of information that they upload.
- **Commerce.** A wide range of scams are running on the internet. Service users and staff who do financial transactions using technology can put themselves at risk.

A related source of support is a service run by the [UK Safer Internet Centre](#). A helpline provides support with all aspects of digital and online issues such as social networking sites, cyber-bullying, sexting, online gaming and child protection online. The Helpline aims to resolve issues professionals face about themselves, such as protecting professional identity and reputation, as well as young people in relation to online safety.

Health and Safety

Shoreditch Trust's Health and Safety Policy gives guidance to those whose roles involve working with children and adults at risk. Where children and young persons are involved, the risk assessment must take account of their vulnerabilities, which will include child protection.

Use of photographic/filming equipment at Shoreditch Trust

Shoreditch Trust will not take inappropriate photographs or film footage of young and disabled service users in at risk positions. All managers should be

vigilant, and any concerns should to be reported to the Lead Designated Person/ Designated Person(s) or a Safeguarding Officer.

Safeguarding Designated Persons: Terms of Reference

- Overseeing the referral of cases of suspected abuse or allegations to the Social Services Access Team and the Child Protection Officer of the local police.
- Providing advice and support to other staff on issues relating to Safeguarding.
- Maintaining a record of any child protection or Safeguarding referral, complaint or concern (even where that concern does not lead to a referral).
- Liaising with the LSCB (Local Safeguarding Children's Board), and other appropriate agencies
- Ensuring that the Lead Designated Person and staff receive training in safeguarding issues and are aware of Shoreditch Trust's Safeguarding Policy and Procedures.

The Lead Designated Person(s) will provide an annual report to Senior Management at Shoreditch Trust setting out how the organisation has discharged its duties. They are responsible for reporting deficiencies in procedures or policies at the earliest opportunity. The Lead Designated Person is responsible for liaising with the Senior Manager with Lead Responsibility over matters regarding child protection and Safeguarding; including:

- Ensuring that the organisation has procedures and policies which are consistent with the LSCB (Local Safeguarding Children's Board).
- Ensuring that Shoreditch Trust evaluates the policy on Safeguarding every two years.
- That the Senior Manager with Lead Responsibility over matters regarding child protection and Safeguarding ensures that the staff have complied with the policy, including, but not limited to, a report on the training that staff have undertaken.
- The Lead Designated Person is responsible for overseeing the liaison between agencies such as the police, social services – as defined by the LSCB (Local Safeguarding Children's Board) in connection with, and in the event of, any allegations against any member of staff. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries.

Other designated members of staff with responsibility for child protection and safeguarding at Shoreditch Trust will:

- Report to the designated person with lead responsibility.
- Know how to make an appropriate referral.
- Be available to provide advice and support to other staff on issues relating to child protection or safeguarding.

- Have responsibility to be available to listen to children, young people and adults at risk engaged with Shoreditch Trust.
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Have received training in child protection and Safeguarding issues and inter-agency working, as required by the LSCB (Local Safeguarding Children's Board), and will receive refresher training at least every 2 years.

Designated Person for Safeguarding at Shoreditch Trust

Staff	Position	Employer	Contact Nos.
Kati Martin	Lead Designated Person	Shoreditch Trust	0207 0338545

If you are unable to locate a lead or officer, contact a Senior Manager:
02070338500

Jacqui Roberts	Chief Executive Officer	Shoreditch Trust	07775 840 027
Jacqui Henry	Director of Wellbeing Practice and Partnerships	Shoreditch Trust	07508 022379
Jane Lavelle	Programme Lead – Women Children and Families	Shoreditch Trust	02070338524 07443 670 634

Children’s Social Care First Response:

Hackney Children and Families Services Multi Agency Safeguarding Hub (MASH) is part of the Access, Assessment and Family Support Service. It is the team professionals and members of the public contact if there are concerns about children’s welfare that may require a statutory social work response.

If you have safeguarding concerns about a child who lives in Hackney, you can contact the team directly:

Office hours 9-5 Monday-Friday except Bank Holidays: Tel: 020 8356 5500

If you know the child concerned is already receiving input from CSC you should contact the allocated social work unit directly.

The relevant page on Hackney Council’s website is:

<https://hackney.gov.uk/safeguarding-vulnerable-adults> The online referral form can then be filled in.

Please consult with the Trust’s Lead Designated Person but if still unsure as to whether the threshold is met for statutory social work involvement or if the matter seems urgent then please call Multi Agency Safeguarding Hub (MASH) on 020 8356 5500 for advice.

If you need to contact Hackney Children’s Social Care about an urgent safeguarding issue outside office hours Tel: 020 8356 2710.

Safeguarding Adults:

Visit the [Safeguarding Vulnerable Adults](#) page of the London Borough of

Hackney website.

Tel: 020 8356 5782 or Tel: out of hours 020 8356 2300

Police: 101 (Local Network: Hackney)

Emergency: 999

Safeguarding Code of Conduct: Guidance for Employees

To support this policy, a guide for staff and managers provides practical guidance on working with children and adults at risk.

Staff Training

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff and volunteers to:

- Analyse their own practice against established good practice, and to ensure their practice is likely to protect them from false allegations.
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse.
- Respond to concerns expressed by a child or adult at risk.
- Work safely and effectively with children and adults at risk.

Staff Clinical Supervision

Clinical supervision is a monthly group activity that brings a skilled supervisor together with ST staff teams in order to reflect upon their practice and work with clients. It is a time for staff, who work directly with clients, to think about knowledge and skills and how they may be developed to improve care, performance and safeguarding.

Where there is a complaint against a member of staff there may be three types of investigation:

a criminal investigation

a child protection investigation

a disciplinary or misconduct investigation.

The results of the police and child protection investigation may well influence the disciplinary investigation, but not necessarily.

Concerns about poor practice

If, following consideration, the allegation is clearly about poor practice, the Lead Designated Person/ Designated Person(s) will involve the appropriate senior staff who will deal with it as a misconduct issue.

If the allegation is about poor practice by the Lead Designated Person/ Designated Person(s), or if the matter has been handled inadequately and concerns remain, it should be reported to the relevant senior manager at Shoreditch Trust who will decide how to deal with the allegation and whether or not to initiate disciplinary proceedings.

Concerns about suspected abuse

Any suspicion that a child or adult at risk has been abused by either a member of staff, a volunteer, or service user should be reported to the Lead Designated Person/ Designated Person(s), who will take such steps as considered necessary to ensure the safety of the child or adult at risk in question and any other child or adult at risk who may be at risk.

The Lead Designated Person/ Designated Person(s) will refer the allegation to the social services department which may involve the police, or go directly to the police if out-of-hours.

The parents or carers of the child or adult at risk will be contacted as soon as possible following advice from the social services department.

The Lead Designated Person/ Designated Person(s) or CEO will deal with any media enquiries.

If the Lead Designated Person/ Designated Person(s) is the subject of the suspicion/allegation, the report must be made to the appropriate Manager or in his/her absence to social services.

Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

This includes the following people:

- The Lead Designated Person/ Designated Person(s)
- The parents/carer of the person who is alleged to have been abused
- The person making the allegation
- Social services/police
- The Senior Manager at Shoreditch Trust
- The alleged abuser (and parents/carer if the alleged abuser is a child).

Information should be stored in a secure place with limited access to designated people and in line with data protection laws e.g., that information is accurate, regularly updated, relevant and secure.

Internal enquiries and suspension

The Lead Designated Person/ Designated Person(s) will consult with a Senior Manager at Shoreditch Trust who will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries.

Irrespective of the findings of the social services or police inquiries, Shoreditch Trust will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is

insufficient evidence to uphold any action by the police. In such cases, Shoreditch Trust must reach a decision based upon the available information, which could suggest that on a balance of probability; it is more likely than not that the allegation is true. The welfare of the child should remain of paramount importance throughout.

Support to deal with the aftermath of abuse

Consideration should be given to the kind of support that children, parents, adults at risk and members of staff may need. Use of help lines, support groups and open meetings will maintain an open culture and help the healing process. The British Association for Counselling Directory is available from The British Association for Counselling, BACP House, 15 St John's Business Park, Lutterworth, Leicestershire LE17 4HB, United Kingdom, Tel: 01455 883300, Email: bacp@bacp.co.uk, Internet: <http://www.bacp.co.uk/> Consideration should be given to what kind of support may be appropriate for the alleged perpetrator.

Allegations of previous abuse

Allegations of abuse may be made some time after an event (e.g. by an adult who was abused as a child or by a member of staff who is still currently working with children or adults at risk).

Where such an allegation is made, Shoreditch Trust should follow the procedures as detailed above and report the matter to the social services or the police. This is because other children and/or adults at risk, either within or outside the organisation, may be at risk from this person.

Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children. This is reinforced by the details of the Protection of Children Act 1999.

Action if bullying is suspected. How to help the victim and prevention:

Shoreditch Trust policy on Equality and Diversity must be read in conjunction with this policy.

Shoreditch Trust believes that bullying affects everyone, not just the bullies and the victims. It affects those children and vulnerable adults who watch and those who can be drawn in by group pressure. We do not accept that bullying is an inevitable part of life that sorts itself out given time.

Definition of bullying. The line between "having a joke" and bullying can be thin, but usually the distinction is clear. Bullying is repeatedly and deliberately causing somebody pain or hurt. It may be felt physically or emotionally, be done face-to-face or electronically, individually or in groups, in public or private. If an action sets out to hurt or harm and does so, it is bullying.

- Take all signs of bullying very seriously.
- Encourage all children to speak and share their concerns (if anyone

talks about or threatens suicide, seek professional help immediately). Help the victim to speak out, tell the person in charge or someone in authority.

- Investigate all allegations and take action to ensure the victim is safe.
- Speak with the victim and the bully(ies) separately.
- Reassure the victim you can be trusted, although you cannot promise to tell no one else.
- Keep records of what is said (what happened, by whom, when).
- Report any concerns to the Lead Designated Person/ Designated Person(s) or a Safeguarding Officer.

Action towards the bully(ies):

- Talk with the bully(ies), explain the situation, and try to get the bully(ies) to understand the consequences of their behaviour.
- Seek an apology to the victim(s).
- Inform the bully(ies)'s parents/carer.
- Insist on the return of 'borrowed' items and that the bully(ies) compensate the victim.
- Impose sanctions as necessary.
- Encourage and support the bully(ies) to change behaviour.
- Hold meetings with the families (where appropriate) to report progress.
- Inform all appropriate organisation members of action taken.
- Keep a written record of action taken.

Concerns outside the immediate environment e.g. a parent or carer:

Report your concerns to the Lead Designated Person/ Designated Person(s) immediately or, where any concerns are reported to a Safeguarding Officer, they must inform the Lead Designated Person with a report. A decision is then quickly made as to whether to contact social services or the police as soon as possible.

If the Lead Designated Person/ Designated Person(s) is not available, the Safeguarding Officer being told of, or discovering the abuse, should contact social services or the police immediately. **Maintain confidentiality on a need-to-know basis only.**

Information for social services or the police about suspected abuse:

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern regarding the child or adult at risk which should include the following:

- The name, age and date of birth.
- The home address and telephone number.
- Whether the person making the report is expressing their own concerns, or someone else's.

- The nature of the allegation. Include dates, times, any special factors and other information.
- Make a clear distinction between what is fact, opinion or hearsay.
- A description of any visible bruising or injuries, any indirect signs, such as behavioural changes.
- Details of witnesses to the incidents.
- The alleged victim's account, if it can be given, of what has happened and how any bruising or other injuries occurred.
- Have the parents/carer been contacted? If so, what has been said?
- Has anyone else been consulted? If so, record details.
- If the child or adult at risk was not the person who reported the incident, has the alleged victim been spoken to? If so, what was said? Has anyone been alleged to be the abuser? If so, record details. Where possible, referral to the police or social services should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.

If you are worried about sharing concerns about abuse with a senior colleague, you can contact social services or the police direct, or the NSPCC Child Protection Helpline on 0808 800 5000.

Support and Guidance notes for staff

Step by Step Guide

1. If a potential concern is reported, remember – keep calm.
2. Inform service user or staff member that action will need to be taken.
3. If someone is in immediate danger, call the police on 999 or 101 for welfare check.
4. Report to/ consult with safeguarding lead at Shoreditch Trust or GP practice.
5. Complete online request for support form or call relevant numbers (see page 2)
6. Record on Plinth.
7. If decision is made the raise safeguarding alert complete referral to Hackney Social Care and update Plinth (and EMIS if relevant).

The 5 R's (Recognise, Respond, Report, Record and Refer)

Recognise

The ability to recognise behaviour that may indicate abuse or other types of harm is of fundamental importance. Whether the abuse may occur on the premises of the organisation, in the home or in any other setting in which the service user may find themselves, all those playing a role in

meeting the service users' needs should be aware and informed so that possible abuse or other harm can be recognised, investigated and acted on seamlessly and effectively.

Signs and indicators of abuse in young people and/or adults at risk may include disclosure. This isn't always easy to recognise as such, as it may be that the service user is struggling to find the words, is using language the abuser uses for actions and body parts, or the disclosure is wrapped in analogy or euphemism which is difficult to identify.

A service user may choose anyone in the organisation to disclose to including managers; tutors/instructors; volunteers; counsellors; business support staff; catering or administrative staff; peers

Anyone from these groups may be the ones to spot concerning signs or behaviour in the service user. This is why all staff and volunteers need to be trained in how to recognise and respond to this situation, and how to report a concern.

Recognising signs and indicators of abuse is also difficult, as any signs could have another explanation. It is important that all staff are trained in spotting possible signs, not encouraged to overreact and assume abuse is occurring, but to know when to pass on concerns to the appropriate person.

It is important that there is a culture where people can discuss and raise concerns without worrying that they might get it wrong or that others will overreact. Reporting to someone with more experience and responsibility is the only way difficulties can be addressed.

Respond

The appropriate response is vital. No disclosure about possible abuse or neglect should ever be ignored. In order to determine the most appropriate response, find out if you are dealing with an allegation from a service user against a member of staff, another service user or another person outside the organisation.

Is the disclosure from an individual alleging abuse to themselves or another person? Is this the reporting of a concern or suspicion? What is alleged to have happened? Your role in the moment when you listen, and respond is to ascertain what you are dealing with.

The individual may be very scared and emotional in telling you this information, so you must stay calm, use effective empathic listening skills, and not let them know if you are feeling panicked, shocked or outraged at what you are hearing, as this may shut them down.

You need to ask open questions (not leading) and gather enough information to know that it is a disclosure of abuse that needs to be passed

on, and how immediate the danger is to the individual. It is not your role to get a detailed account, as the individual may have to tell their story numerous times.

You must also not make any promises about what will happen next, as you don't know – you just need to be clear that it will be treated in confidence but recorded and passed on to the appropriate people/ person i.e. the Lead Designated Person/ Designated Person(s) or Safeguarding Officer. Nor can you make promises that it will get better as the service user may be facing a difficult time ahead.

Do not lead or probe with questions – ask only completely open questions. Demonstrate interest and concern, and take it seriously, even if you are finding it difficult to believe because it is so shocking, or perhaps it is an allegation being made against someone known to you. Finally reassure that they have done the right thing by telling you, and you will do what you can to help.

Report

Report concerns to your Lead Designated Person/ Designated Person(s) or Safeguarding Officer. This should be the default action to take. Concerns of a staff member may not always be apparent as safeguarding concerns. Something might at first appear to be related to equality, a practice issue or generally about the conduct of a staff member.

In these cases, where it is not immediately apparent that the concern could be related to safeguarding, you may want to discuss this with your line manager.

However, if it is likely to be a matter related to safeguarding, it must be reported directly to the Lead Designated Person/ Designated Person(s) or Safeguarding Officer, bypassing the line manager, as the less people in the chain of communication the better – as long as those with named responsibility within your procedures are aware of the situation.

Members of staff named in this Policy, of suitable seniority and with appropriate training and support with designated responsibility for safeguarding, are publicly identified in ways, locations and formats which are easily accessible to staff and service users.

Once you have reported concerns about abuse to the Lead Designated Person/ Designated Person(s) or Safeguarding Officer the responsibility for taking action lies with them.

You are within your rights to check that appropriate action has been taken, but it may not be necessary for the Lead Designated Person/ Designated Person(s) or Safeguarding Officer to share the details of this with you for the

confidentiality of the individual concerned.

If you are genuinely concerned that the matter has not been taken forward you can make a referral directly out of the organisation, but bear in mind that action and referrals may have been made already that you are unaware of.

Record

Record precisely what has been alleged, using key phrases and words the individual used. You are not expected to remember every detail of the conversation, and therefore it is not recommended that notes or any other recording is made during the conversation, but immediately afterwards, as doing so during the conversation can cause the service user to feel afraid of the formality this might bring, when they just need someone to listen at this first stage. Sound recording of the conversation is also not recommended for the same reason.

You should also record your observations of the individual, as well as your interpretation of the facts as long as you clearly identify when you are doing so.

This record should be passed on, in person where possible, to the Lead Designated Person/ Designated Person(s) or Safeguarding Officer, who should store it securely and separately to service users' individual files. It should only be accessible to those who have responsibility over safeguarding matters.

Refer

This is the responsibility of the Lead Designated Person/ Designated Person(s) who should gather all the information to make a referral, if appropriate, by talking to the appropriate people inside or outside the organisation, and make the decision (in conjunction with their deputy if appropriate) on what action to take: i.e. whether to monitor and record the concern, or to refer it on.

Only the Lead Designated Person/ Designated Person(s) or their deputy should be making referrals outside the organisation as it should prevent numerous referrals being made for the same incident; it allows consistency in the process, and means that the Lead Designated Person/ Designated Person(s) can build relationships with the referral agencies.

No one else in the organisation should be making these enquiries and should discuss with the Lead Designated Person/ Designated Person(s) any further action to be taken.

Public Interest Disclosure ('Whistleblowing')

What this policy covers

The Trust constantly strives to safeguard and act in the interest of the public

and its employees. It is important to the Trust that any fraud, misconduct or wrongdoing, by employees or other agents, is reported and properly addressed.

This policy applies to all employees and all other agents of the Trust, who are encouraged to raise concerns in a responsible manner. The Trust prefers that a concern is raised and dealt with properly, rather than kept quiet.

Your responsibilities

You are encouraged to bring to the attention of the Trust any practice or action of the Trust, its employees or other agents that you reasonably believe is against the public interest, in that the practice or action is:

- a criminal offence
- a failure to comply with any legal obligation
- a miscarriage of justice
- a danger to the health and safety of any individual
- an attempt to conceal information on any of the above

Any individual raising legitimate concerns will not be subject to any detriment, either during or after employment. The Trust will also endeavour to ensure that the individual is protected from any intimidation or harassment by any other parties.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work, which should be raised under the Trust's Grievance Procedure.

Procedure

In the first instance, you should raise any concerns you have with your manager. If you believe your manager to be involved, or if, for any reason, you do not wish to approach your manager, then you should raise it with a more senior person in the Trust. Any matter raised under this policy will be investigated promptly and confidentially. The outcome of the investigation, as well as any necessary remedial action to be taken, will be confirmed to you. If no action is to be taken, the reason for this will be explained to you.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly. If you raise any concerns under this policy, the Trust is committed to ensuring that you are protected from victimisation, harassment or less favourable treatment. Any such incidents will be dealt with under the Trust's Disciplinary Procedures.

Escalating your concern

If you are dissatisfied with this response, you should raise your concerns in writing directly with a more senior person in the Trust.

If, after escalating your concerns, you believe that the appropriate remedial action has not been taken, you should then report the matter to the proper authority. These authorities include:

- HM Revenue & Customs
- the Financial Conduct Authority
- the Health and Safety Executive
- the Environment Agency or Scottish Environmental Protection Agency
- the Information Commissioner

This list is not intended to be exhaustive, and you must take care to ensure you contact the proper authority in relation to the particular concerns you have.

If you are unsure as to the appropriate authority, advice can be sought from Public Concern at Work, which is an independent Whistleblowing Charity. Their contact details are at the end of this policy.

If you raise a false allegation and you are found to be culpable, or in any way involved in the wrongdoing, or if you raise a concern maliciously or in a manner not prescribed in this policy, then you may be subject to disciplinary action up to and including dismissal without notice for gross misconduct.

You should not disclose to a non-relevant third party any details of any concern raised in accordance with this policy, and you must not, in any circumstances, publicise your concerns in any way.

Independent advice

Independent advice and support can be obtained from Public Concern at Work (Independent Whistleblowing Charity):

Email address: whistle@pcaw.co.uk

Tel: 020 7404 6609

Website: www.pcaw.co.uk

Safeguarding Audit Tool

The following checklist is an Audit Tool used to help ensure Shoreditch Trust and individual projects have all the Safeguarding Policies, Procedures and appropriate Systems in place.

Policy, procedure or system	In place?
A detailed safeguarding policy and a procedure for what to do if there are concerns about a child's/adult at risk's welfare	
Information for young people and adults at risk about the safeguarding policy and where to go for help.	
A rigorous recruitment and selection process for staff and volunteers who work with children/adults at risk	
Policies on equality and diversity, health and safety and user voice (service users and staff) as part of a provider's quality system. Processes in place for dealing with complaints and for taking disciplinary action where necessary	
A whistle-blowing policy. This is an open and well- publicised way for staff or service users to voice any concerns about abusive or unethical behaviour	
A written code of conduct which outlines good practice when working with children/adults at risk	
Annual (minimum of 2 hours) refresher training for all those in contact with children or adults at risk	
Support Resources available for all staff	
Safeguarding explored in staff induction	
Risk assessments for all individuals and activities – and reviewed as appropriate	
Telephone checks on references	

Policy, procedure or system	In place?
A designated person for dealing with concerns or allegations of abuse and step-by-step guidance on what action to take.	
DBS checks carried out and updated	
A protective culture that puts service users' interests first – service users must feel confident that if they have concerns someone will listen and take them seriously	
Checks carried out on any satellite or organisation affiliated premises	
Safeguarding issues are dealt with swiftly	
Links to appropriate External Agencies	
Robust and effective reporting systems	
Safeguarding embedded into training/mentoring delivery schemes as appropriate	
Safe working practices in delivery of training and mentoring activities	
Service user Safeguarding awareness and/or training in Induction	
Monitoring of incidents and near misses	
Clarity of responsibility	
Safeguarding reporting procedure is summarised in the Service User Handbook	

Policy, procedure or system	In place?
Safeguarding Policy and Procedures reviewed bi-annually	

Safeguarding: Towards Excellence

Passive/negative	Compliant	Promotional – Towards Excellence
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<p>It won't happen here. Our staff are professionals, known to us, trusted and appointed because of their expertise. We are already audited every which way for health and safety, so the last thing we need is more interference.</p>	<p>We have a policy on Safeguarding young people and adults at risk.</p> <p>Anyone can see the policy if they access it on Sharepoint. The board chair signature/approval is on each policy.</p>	<p>All staff are required to undergo training to implement the policy. The policy is explored in staff and service user induction.</p> <p>All staff discuss the policy, practice and case reviews in monthly clinical supervision.</p> <p>The policy is made available in a designated folder of printed and electronic formats.</p> <p>Trustees receive an annual Safeguarding report.</p> <p>All staff and apprentices are briefed on safeguarding policy and principles.</p> <p>Safeguarding is included in the annual risk register/statement of control.</p> <p>Safety and safeguarding is reflected in the stated corporate values. Quality improvement evaluates the effectiveness of Safeguarding policy and practice and as a result, informs observation and staff training.</p> <p>All policies and procedures have been reviewed so that safeguarding can be embedded in them.</p>
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Understanding abuse

It can often be difficult to recognise abuse. The signs listed in these guidelines are only indicators and many can have reasonable explanations. Children and adults at risk may behave strangely or seem unhappy for many reasons, as they move through the stages of personal

development, or their families experience changes. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further. Someone can abuse a child by actively inflicting harm or by failing to act to prevent harm.

Abuse can take place within a family, in an institutional or community setting, by telephone or on the Internet. Abuse can be carried out by someone known to a child or by a stranger. If you are worried about a child, it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether a pattern emerges and provide evidence to any investigation if required.

Physical abuse can involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, and suffocating. It can also result when a parent or carer deliberately causes the ill health of a child or adult at risk to seek attention; this is called fabricated illness, or Munchhausen's Syndrome by Proxy.

Symptoms that indicate physical abuse include:

- Bruising in or around the mouth, on the back, buttocks or rectal area
- Finger mark bruising or grasp marks on the limbs or chest of a small child
- Bites
- Burn and scald marks; small round burns that could be caused by a cigarette
- Fractures to arms, legs or ribs in a small child
- Large numbers of scars of different sizes or ages

Emotional abuse happens when a child or adult at risk's need for love, security, praise and recognition is not met. It usually co-exists with other forms of abuse. Emotionally abusive behaviour occurs if a parent, carer or authority figure is consistently hostile, rejecting, threatening or undermining. It can also result when children or adults at risk are prevented from social contact with others, or if developmentally inappropriate expectations are imposed upon them. It may involve seeing or hearing the ill-treatment of someone else. Symptoms that indicate emotional abuse include:

- Excessively clingy or attention-seeking behaviour
- Very low self-esteem or excessive self-criticism
- Excessively withdrawn behaviour or fearfulness; a 'frozen watchfulness'
- Despondency
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders

Neglect is the persistent failure to meet a child or adult at risk's basic physical and/or psychological needs, causing damage to their health and

development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect a child or adult at risk from harm or danger, or failing to access appropriate medical care and treatment when necessary.

It can exist in isolation or in combination with other forms of abuse.

Symptoms of physical and emotional neglect can include:

- Inadequate supervision; being left alone for long periods of time
- Lack of stimulation, social contact or education
- Inadequate nutrition, leading to ill-health
- Constant hunger; stealing or gorging food
- Failure to seek or to follow medical advice such that a child's life or development is endangered
- Inappropriate clothing for conditions

Sexual abuse involves forcing or enticing a child, young person or adult at risk to take part in sexual activities, whether the subject is aware of what is happening. This may include physical contact, both penetrative and non-penetrative, or involve no contact, such as watching sexual activities or looking at pornographic material. Encouraging children or adults at risk to act in sexually inappropriate ways is also abusive. The Sexual Offences Act 2003 (Notification Requirements) (England and Wales) Regulations 2012 and Explanatory Notes are available on legislation.gov.uk.

Symptoms of sexual abuse include:

- Allegations or disclosure
- Genital soreness, injuries or discomfort
- Sexually transmitted diseases; urinary infections
- Excessive preoccupation with sexual matters; inappropriately sexualized play, words or drawing
- A child who is sexually provocative or seductive with adults
- Repeated sleep disturbances through nightmares and/or wetting.

Older children and young people may additionally exhibit:

- Depression
- Drug and/or alcohol abuse
- Eating disorders; obsessive behaviours
- Self-mutilation; suicide attempts
- School/peer/relationship problems

Some members of our communities hold beliefs that may be common within particular cultures, but which are against the law in England. Shoreditch Trust does not condone practices that are illegal or harmful to children or adults at risk.

Examples of practices are:

Forced Marriages

No faith supports the idea of forcing someone to marry without their consent. This should not be confused with arranged marriages between consenting adults. Visit [government guidance](#) on forced marriage.

Under-age Marriages

In England, a young person cannot legally marry or have a sexual relationship until they are 16 years old or more. Visit [Girls not Brides](#) for further information.

Female Circumcision

This is against the law, yet we know that for some in our communities it is considered a religious act and a cultural requirement. It is also illegal for someone to arrange for a child to go abroad with the intention of having her circumcised. Visit [Multi Agency Statutory Guidance on Female Genital Mutilation 2016](#).

Ritualistic Abuse

Some faiths believe in spirits and demons and that these spirits and demons can possess people (including children). What should never be condoned is the use of any physical violence to get rid of what is perceived to be a possessing spirit. This is physical abuse and people can be prosecuted even if it was their intention to help the child or adult at risk.

Updated Types of Harm Emphasised in 2026 guidance emphasises:

- Harm outside the home
- Domestic abuse
- Coercive control
- Hidden harms (e.g., teenage relationship abuse, child sexual abuse)
- Online harms
- Group-based exploitation [\[gov.uk\]](#)

Approval and Review

This Policy was prepared by the Chief Executive, Director of Operations with support from an external Clinical Supervisor to provide a framework for the management of its safeguarding processes and procedures. The policy is reviewed continuously with support from an external Clinical Supervisor to ensure controls are robust and meet the needs of the business and its client's and staff day to day. The Policy will be reviewed on an annual basis by the Board of Trustees to ensure continuing appropriateness.

Approved by Shoreditch Trust Board
Signed Chair

A handwritten signature in black ink, consisting of a vertical stroke on the left that curves into a horizontal line extending to the right.

April 2026