

National Centre for Creative Health (NCCH)

Safeguarding Policy Statement

Registered Charity No. 1190515

Policy Adopted October 2020
(Updated July 2025)



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1. INTRODUCTION

This Safeguarding Policy and associated procedures applies to all staff, trustees, freelance and contracted workers, and volunteers (aka 'associated personnel') of the National Centre for Creative Health (NCCH). This Policy sits alongside our **Safeguarding Procedures which includes two separate procedures on: Safeguarding Children and Safeguarding Adults at Risk of Harm.**

NCCH Safeguarding Procedures

1.1. Purpose

The purpose of NCCH's Safeguarding policy and procedures is to protect children, adults at risk of harm and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with NCCH. This includes harm arising from:

- The conduct of staff, NCCH trustees or personnel associated with NCCH, including other beneficiaries.
- The design and implementation of NCCH's programmes and activities

As an advocacy and policy organisation rather than a delivery/services organisation, risks around safeguarding issues remain low, however our NCCH Safeguarding policy and associated procedures lays out the commitments made by NCCH and informs staff, trustees and associated personnel of their responsibilities in relation to safeguarding. The policy aligns with the guidance and our duties as laid out by the Charity Commission in their document 'Safeguarding and protecting people for charities and trustees' which is accessible at: <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

The policy does not cover: Anti-Harassment and Bullying.

1.2. Policy Statement

NCCH believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. NCCH will not tolerate abuse and exploitation by staff, NCCH trustees or associated personnel in carrying out work on NCCH's behalf.

Our policy and procedures address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from criminal exploitation (including sexual, gang related and exploitation by modern slavery), abuse, and radicalisation (preventing people from being drawn into terrorism, extremism and radicalised ideology).

Our procedures also cover suspected abuse seen by NCCH staff, trustees and associated personnel in the course of their work, but perpetrated by those not associated with NCCH.

Our statement and policy also considers ongoing assessment and a yearly risk review of safeguarding. **2025/2026 policy assessment:** As an advocacy and policy organisation rather than a delivery/services organisation, overall risks around safeguarding issues remain low due to the infrequent level of 'regulated activity' or projects/work with children and adults at risk. NCCH is aware that these areas of our programmes may grow to work more with children and young people and/or adults who may be classed as at risk and could be defined as beneficiaries of the organisation's activities or beneficiaries through our partnership activities. As such no matter the assessed 'level of risk', we have an organisational commitment to ensure all beneficiaries of the organisation's activities, or beneficiaries through our partnership activities are protected from all forms of harm, abuse, neglect and exploitation. Under this remit NCCH staff, trustees and associated personnel will adhere to NCCH's safeguarding policy and procedures as required, including in particular to NCCH's safeguards around partnerships responsibilities as well NCCH programme strands and delivery procedures, as NCCH considers these as organisational risks.

RESPONSIBILITIES

2.1. Organisational responsibilities

NCCH will:

- Ensure all staff, trustees and associated personnel have access to, are familiar with, and know their responsibilities within this policy and associated procedures, including aspects of recognising and reporting abuse as detailed in our procedures.
- Design and undertake all its programmes and activities in a way that protects both children and adults from any risk of harm that may arise from their coming into contact with NCCH. This includes risk assessing projects/programmes of work involving children and/or adults at risk of harm as well as how and which information about individuals undertaking activities is gathered, stored, and communicated.
- Always consider the safeguarding risks associated with NCCH partnership programmes and activities, and mitigate any risks by considering additional safeguarding commitments, this should include bespoke risk mapping and safeguarding partnership agreements.
- Implement safeguarding procedures when recruiting, managing and deploying staff, trustees and associated personnel, including seeking appropriate references and carrying out Disclosure and Barring checks, as required for the role undertaken and prior to any appointment.

- Ensure staff, trustees and associated personnel receive training on safeguarding children and adults, at a level commensurate with their role in the organisation and safeguarding responsibilities.
- Support the safety of staff, trustees, and associated personnel by offering suitable and sufficient training procedures if their NCCH role includes 'regulated activity' or any direct work with children and adults at risk, this may include carrying out lone working risk assessments if required.
- Support the safety and wellbeing of staff, trustees, and associated personnel by offering suitable support via qualified professionals and suggested professional advice lines for those who witness and report a safeguarding incident/disclosure.
- Follow up on reports of safeguarding concerns promptly and according to due process, involving statutory agencies as required and/or formal escalation as required, regardless of whether the alleged abuse has been perpetrated by NCCH staff, trustees or associated personnel.

NCCH has in place Designated Safeguarding Lead (DSL) from our Trustee Board to champion Safeguarding in all aspects of our work. The Designated Safeguarding lead is:

Named Trustee: William Boa, who can be contacted at bill.boa@btinternet.com / 07500 844514

To support and guide NCCH staff, trustees and associated personnel through the process of reporting a safeguarding concern, and to support NCCH senior staff, and Designated Safeguarding Lead/s, and the Board of Trustees in taking the right steps to respond to reported concerns and escalation process, the organisation has designed a set of flowcharts, as mentioned earlier in this document, which cover the following **Appendices**:

i. Disclosure of Abuse Made by a Child: <https://ncch.org.uk/uploads/Appendix-I.-NCCH-SAFEGUARDING-PROCEDURE-FLOWCHART-Disclosure-of-Abuse-made-by-a-Child.pdf>

ii. Allegations Management – Abuse of Children: <https://ncch.org.uk/uploads/Appendix-II.NCCH-SAFEGUARDING-PROCEDURE-FLOWCHART- Allegations-Management--Abuse-of-Children.pdf>

iii. Disclosure/Observation of Adults at Risk: <https://ncch.org.uk/uploads/Appendix-III.NCCH-PROCEDURE-FLOWCHART-Disclosure-or-Observation-of-Adults-at-Risk.pdf>

iv. Allegations Management – Abuse of Adults at Risk: <https://ncch.org.uk/uploads/Appendix-IV.-NCCH-SAFEGUARDING-PROCEDURE-FLOWCHART-Allegations-Management--Abuse-of-Adults-at-Risk.pdf>

2.2. Recruitment responsibilities

NCCH senior staff have undertaken training in Safer Recruitment and NCCH has designed a **NCCH Safer Recruitment Policy** to guide all staff in robust, consistent and safe measures when handling recruitment, particularly in relation to any work that includes working directly with children, young people and 'adults at risk'.

This NCCH Safer Recruitment Policy Statement is included on all NCCH recruitment documents:

NCCH is committed to safeguarding and promoting the welfare of children and adults at risk of harm. The National Centre for Creative Health expects all staff, trustees, and associated personnel to share this commitment. The National Centre for Creative Health has a clear safeguarding policy and will take up references and will make appropriate checks as required prior to any offer of an appointment.

2.3. Trustee and Staff responsibilities

NCCH staff, trustees and associated personnel must ensure legal compliance when working with or around children, adults at risk and other parties. This includes protection from sexual exploitation, criminal exploitation, abuse and radicalisation.

Additionally, NCCH staff, trustees and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy and associated procedures.
- Report any concerns or suspicions regarding safeguarding of children and adults at risk of harm and also any legal violations by NCCH staff, trustees or associated personnel to the appropriate staff member, this would be to: the NCCH Director; the Board's Designated Safeguarding Lead; or if the allegations relate to either of these individuals then the NCCH Board and/or appropriate authorities as highlighted in our associated safeguarding procedures.

2.4. Partnership responsibilities

Protecting children and adults at risk of harm is extremely important in all aspects of NCCH's work. NCCH will ensure that prior to the engagement in any partnership or collaboration which NCCH considers could have associated risks related to safeguarding, for example working with a delivery partner on a joint project which includes 'regulated activity', the charity is actively satisfied that the partner organisation/s has in place a Safeguarding Policy and procedures, including safer recruitment, and that these are robustly and routinely used. This satisfaction will be sought through formal and binding safeguarding clauses in partnership agreements, evidence of policies & procedures, as well as structured conversations, and through group meetings about collaboratively managing safeguarding at the beginning of any partnership working, and throughout the period of the active partnership.

NCCH's commitment to safeguarding means NCCH staff, trustees and associated personnel are actively encouraged to foreground the importance of safeguarding within these projects, and NCCH will ask all collaborating partners delivering work which includes any 'regulated activity' with children and adults at risk, and/or to any partner collaboration where there may be potential risk to safeguarding, to read and sign NCCH's Safeguarding Code of Conduct Agreement and Declaration of Disclosure for Collaborating Partners, and will actively request a Safeguarding Meeting with collaborating partners to inform our NCCH Collaborative Safeguarding Risk Mapping Tool, which risk assesses the context in which the programme/project is to take place and to identify any risks and issues related to safeguarding within these contexts.

These Safeguarding Meetings and Mapping Tool will identify a safeguarding lead in each collaborating partner organisation, ensure that all staff across all organisations involved in the project are clear on how to raise safeguarding concerns within the programme and that information on how to do so is clearly communicated to all staff, collaborating partners, contractors and participants. They will also ensure that collaborating partner

organisations are aware of any potential safeguarding risks identified in the programme/project. As part of this assessment it would include collaboratively creating a Bespoke Safeguarding Reporting Flowchart.

NCCH expects all collaborating partners to abide by our Safeguarding Photography/Filming Procedures to safeguard any children and adults at risk. NCCH will ask all partners to confirm their rights and use of any photography or images which are shared, or alternatively NCCH may ask partners to use NCCH's Consent and Release Forms if required for a partnership project involving children and/or adults at risk.

Risk Mapping Tool template can be viewed here: <https://ncch.org.uk/uploads/NCCH-Collaborating-Partners-Safeguarding-Risk-Mapping-Tool-Template.pdf>

Safeguarding Code of Conduct Agreement and Declaration of Disclosure for Collaborating Partners template can be viewed here: <https://ncch.org.uk/uploads/NCCH-Safeguarding-Code-of-Conduct-Agreement-and-Declaration-of-Disclosure-for-Collaborating-Partners.pdf>

2.5. Partnership responsibilities in an international context

From time to time, NCCH may work with international partners and participants. Though such work/projects may be rare or infrequent, NCCH still considers the importance of safeguarding in this context. Due to the complexity of international regulatory frameworks, bespoke and specific safeguarding risk assessments will be undertaken prior to any project or event involving children and/or adults at risk with international partners and participants. Also, where NCCH has a concern regarding safeguarding children or adults in an international situation, for example a delegate from abroad attending an event held in the UK, NCCH Senior Staff or the Designated Safeguarding Lead would contact the UK embassy linked to the nationality of the child or adult at risk. Details of embassies can be found: <https://www.gov.uk/government/publications/foreign-embassies-in-the-uk>

2. MONITORING AND REVIEW

The NCCH Director in conjunction with the named trustee on this policy will review this policy and associated procedures every year and will make any changes necessary. All NCCH employees, trustees, and associated personnel are required to familiarise themselves with NCCH's Safeguarding policy and procedures upon their appointment to NCCH, and the Policy Owner will provide additional advice and support on this policy if requested by an employee, trustee, or associated personnel.

As part of the yearly review of this policy, NCCH will also undertake a yearly 'risk review' of safeguarding as well as reflect on compliance by our staff, trustees and associated personnel to monitor our own compliance and compliance of partners with our NCCH procedures and policies, this includes evidencing records of risk assessments, risk mapping, structured conversations, partnership agreements, and any additional documents or checks which have been recorded.

Any new legislation or developments in existing legislation will also be considered as and when required and the policy and procedures will be updated to reflect these developments. Also, NCCH will continue to actively reflect on these policy and procedures through its programme strands and delivery procedures, gathering learning and re-adjusting systems and processes if necessary.

Useful resources:

Making Safeguarding Personal: <https://www.local.gov.uk/our-support/sector-support-offer/care-and-health-improvement/making-safeguarding-personal>

NCVO Safeguarding Resources: <https://www.ncvo.org.uk/help-and-guidance/safeguarding/>

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Policy Owners:

Director of NCCH

Signed by:



Alex Coulter, Director of NCCH

Board Representative: Bill Boa

Draft approved by Audit, Finance, and Risk Committee (June 2025) and submitted for additional comments by Board of Trustees 3rd July 2025.

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1. PART 1 -SAFEGUARDING CHILDREN

- What is safeguarding children?

To make safeguarding effective, everyone who comes into contact with children and families has a role to play. A child is defined as anyone who has not yet reached their 18th birthday. As a Charity we are an important part of the wider safeguarding system for children via a multi-agency approach including VCSE's (voluntary, charity, social enterprises), a system described in [Working together to safeguard children 2023: statutory guidance](#). As an advocacy and policy organisation rather than a delivery/services organisation, our limited programmes of work with under 18's means our organisational risks are low around safeguarding children, however we have an organisational commitment to ensure all children are protected from all forms of harm, abuse, neglect and exploitation. So, with this in mind this Safeguarding Children procedure and associated pathways appendices are examples of good practice if our programmes and work delivery include work with under 18's.

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment (whether that is within or outside the home, including online - Contextual Safeguarding)
- preventing the impairment of children's mental and physical 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, this includes providing help and support to meet the needs of children as soon as problems emerge.

In order to fulfil our safeguarding responsibilities effectively, we should consider, at all times, what is in the best interests of the child. No single individual can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking action. As an organisation we know the complexity of the key terms and definitions as listed below as indicators of child abuse and understand the subjective nature of some indicators such as neglect which could be due to other factors including economic within that child's needs and circumstance, therefore this policy is meant to help and support our NCCH staff, trustees and associated personnel with good practice instead of just judgment.

- Recognising Child Abuse – Key Terms and Definitions

Safeguarding is everyone's business. As our NCCH Safeguarding Policy states we aim to make all staff, trustees and associated personnel, open and alert to the possibility of abuse of children including recognising and acting upon any form of abuse under the categories stated below. Indicators of harm, abuse, neglect and exploitation from Keeping Children Safe in Education, 2023, are highlighted as:

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical 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.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), 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, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Other indicators include but not limited to:

Child-on-child abuse: Children can abuse other children (often referred to as child-on-child abuse) through but not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships; physical abuse; sexual violence or harassment (These may all include an online element which facilitates or encourages abuse). Concerns about this or disclosures by other children must be taken seriously and staff should consult with the Designated Safeguarding Lead.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE): Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Domestic Abuse: Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn.

Mental Health: All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Only appropriately trained professionals should attempt to make a diagnosis

of a mental health problem.

Concerns may refer to only one or more of the above categories of abuse and may occur in a range of settings. Abuse may not always present as one incident but could present as a pattern of concern about the welfare of the child.

More detailed types of abuse can be referenced here -
<https://learning.nspcc.org.uk/child-abuse-and-neglect>

Also, additional information can be found here -
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused-2>

Also, anyone can also seek advice at any time from the NSPCC helpline –
help@nspcc.org.uk or 0808 800 5000.

- Disclosure of abuse made by a child

In addition to recognising the signs of abuse as stated above, in any of NCCH's programmes and work which incorporates activity with under 18's, our commitment is always ensure that children are listened to and that any disclosures or allegations are taken seriously.

The term 'disclosure' usually relates to a child telling you about familial abuse or abuse elsewhere in their lives. This type of 'disclosure' may also include children who disclose something which is categorised as abuse, however they may not fully view or understand it as abuse if the person involved is a close relative or friend.

The term 'disclosure' is distinct from the term 'allegation' which usually relates to a concern being raised regarding someone working or volunteering with children (see 'Allegations Management' below)

If a child discloses abuse or anything categorised as abuse (which includes neglect, and exploitation) to NCCH staff, trustees or associated personnel during the course of NCCH work or activities, a consultation with the Designated Safeguarding Lead is required: this will include a discussion about how to appropriately reassure and support, and whether a referral to a statutory agency is required. This should be done before any other parties are informed. As next steps might involve making a referral directly to children's social care/the police.

For a clear step-by-step flowchart laying out the reporting procedure pathway for Disclosure of Abuse Made by a Child, please see Appendix I.

I. Disclosure of Abuse made by a Child. *Please view PDF Flowchart at:*
<https://ncch.org.uk/uploads/Appendix-I.-NCCH-SAFEGUARDING-PROCEDURE-FLOWCHART-Disclosure-of-Abuse-made-by-a-Child.pdf>

The NSPCC offers useful online resources which can help with responding to a child who is disclosing abuse: <https://learning.nspcc.org.uk/child-abuse-and-neglect/recognising-and-responding-to-abuse/>

- Allegations Management – Abuse of Children

Allegations of abuse against children by NCCH staff, trustees and associated personnel who are working with children through our NCCH programmes and activities come under the government's statutory guidelines. All concerns about professionals' behaviour towards children, whether their own children or children of others, must be shared, whether or not the professional works or volunteers directly for NCCH.

Allegations may be made when an NCCH staff member, trustee or associated personnel has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

Allegations can be made in relation to physical chastisement and restraint but can also relate to inappropriate relationships between members of staff and children or young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual (see sections 16-19 Sexual Offences Act 2003);
- 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see section 15 Sexual Offences Act 2003);
- Other 'grooming' giving rise to concerns of a broader child protection nature e.g. inappropriate text / e- mail messages or images, gifts, socialising etc;
- Possession of indecent photographs / pseudo-photographs (an image, whether made by computer graphics or otherwise howsoever, which appears to be a photograph) of children.

In addition, these procedures should be applied when there is an allegation that any person who works with children:

- Has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include arrest for possession of a weapon;
- As a parent or carer, has become subject to child protection procedures;
- Is closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to children for whom the member of staff is responsible in their employment/volunteering.

Allegations will be investigated promptly. In the interests of transparency and accountability, NCCH will ensure clear recording of decisions and recommendations arising from the investigation.

Information should not be discussed with other members of staff, but should be reported to the highest person not implicated in the allegation - **Alex Coulter, NCCH Director** who can be contacted at alexandra@ncch.org.uk/ 07973 345967

If the allegation is about the Director, it should be reported to **William Boa, NCCH Trustee** who can be contacted at **bill.boa@btinternet.com** / 07500 844514

All allegations of abuse of children made against those working or volunteering with children will be taken seriously and will be reported to, and discussed with, the Local Authority Designated Office relevant to the geographic area where the allegation took place, so that they can be fully investigated and a referral made to a local authority children's social care for assessment for statutory services.

NCCH will, with the advice from the Local Authority Designated Office, make a decision on whether the allegation meets the thresholds. If so, NCCH will work with the Local Authority Designated Officer, attending the multi-agency Allegations Management meeting involving police, children's social care and any other employer to determine the way forward. NCCH will take the Local Authority Designated Officer advice on when and how the individual should be informed so that evidence may be preserved and children protected.

For a clear step-by-step flowchart laying out the reporting procedure pathway for Allegations Management in the case of Abuse of Children, please see Appendix II.

II. Allegations Management – Abuse of Children. *Please view PDF Flowchart at:*
<https://ncch.org.uk/uploads/Appendix-II.NCCH-SAFEGUARDING-PROCEDURE-FLOWCHART-Allegations-Management--Abuse-of-Children.pdf>

- Local Authority Designated Office Contacts

NCCH will always contact the Local Authority Designated Office relevant to the geographic area where the allegation took place, so it can be fully investigated at the correct level. You can find a local council children's social care team via
<https://www.gov.uk/report-child-abuse-to-local-council>

- Further Resources

Working Together to Safeguard Children (2023):

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

2. PART 2 – SAFEGUARDING ADULTS

- What is safeguarding Adults at Risk of Harm?

As an advocacy and policy organisation rather than a delivery/services organisation, our limited programmes of work with adults at risk and with additional care needs “Adults at Risk of Harm” means organisational risks are low, however this area of our programmes may grow to work more with individuals who may be classed as at risk and could be defined as beneficiaries of the organisation’s activities. As such we have an organisational commitment to ensure all adults at risk who are beneficiaries of the organisation’s activities are protected from all forms of harm, abuse, neglect and exploitation.

Adults may be at risk or have additional care needs at certain times within their lives for example, during physical and mental illness, when intoxicated or under the influence of drugs. Some ‘adults at risk’ may not fully view or understand something as abuse if the person involved is a close relative or friend. Therefore, it is important to talk to adults about the decisions they are making and ensure they understand if they appear to be putting themselves at risk. If not, they may need protecting and a referral should be made to adult social care.

Safeguarding duties apply to an adult who:

- has needs for care and support (whether or not the authority is meeting any of those needs),
- is experiencing, or is at risk of, abuse, neglect, or exploitation and
- as a result of those needs is unable to protect himself or herself against the abuse, neglect or exploitation, or the risk of it. (Care Act 2014, section 42)

Such Adults at Risk of Harm is referred to in this document as ‘adults at risk’

There are 10 categories of abuse for adults at risk:

- Sexual abuse
- Physical Abuse
- Psychological or emotional abuse - can be by action or omission – e.g. causing someone to feel scared by not coming back when you say you will, or causing them to feel frightened by telling them something that isn’t true
- Neglect – including acts of omission such as not providing medication
- Self-neglect
- Financial or material abuse
- Criminal Exploitation – including Modern Slavery (see the [Modern Slavery Act 2015](#)): exploitation of people who have been forced, deceived, or coerced into a life of labour and servitude; exploitation by gangs; and human trafficking
- Domestic abuse - between beneficiaries, between families (children/parents) and between young people
- Discriminatory abuse – can be from staff, other beneficiaries
- Organisational or institutional abuse – where abuse has become part of the organisation’s culture

There are **four additional types of harm** that are not include in the Care Act, but they are relevant to safeguarding adults (as suggested by Ann Craft Trust):

- Cyber Bullying - occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages.
- Forced Marriage - term used to describe a marriage in which one or both of the parties are married without their consent or against their will.
- Mate Crime - when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them.
- Radicalisation - aim to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause.

Many of the signs of abuse (including neglect and exploitation) are similar to those in children. However, Adults can choose to take risks and to place themselves in difficult situations, or refuse to accept protection as long as they have the capacity to do so. Children cannot choose not to be protected.

- Disclosures of abuse made by an Adult at Risk

In addition to recognising the signs of abuse as stated above, in any of NCCH's programmes and work which incorporates activity with adults at risk of harm, our commitment is always ensure that adults at risk are listened to and that any disclosures or allegations are taken seriously

For a clear step-by-step flowchart laying out the reporting procedure pathway for Disclosure/Observation of Adults at Risk, please see Appendix III.

III. Disclosure/Observation of Adults at Risk. *Please view PDF Flowchart at:*
<https://ncch.org.uk/uploads/Appendix-III.NCCH-PROCEDURE-FLOWCHART-Disclosure-or-Observation-of-Adults-at-Risk.pdf>

Over 18's disclosing historic sexual abuse

Following an increase in public awareness about historic abuse there has been an increase in the number of people disclosing historic sexual abuse. If an offence was committed before the person turned 18 it is still covered by the Child Protection Process even if that person is now an adult.

A person over 18 who is making the disclosure does have the option of not wishing to take further action. However, if it becomes clear that the perpetrator is still alive and has access to children e.g. grandchildren, or works with children in a paid or unpaid capacity there is a legal responsibility to report the allegation because other children may be at risk of harm.

Domestic Abuse

Since the introduction of the [Care Act \(2014\)](#), Domestic Violence and Abuse has been recognised as a safeguarding category of abuse in its own right for the protection of 'adults at risk'. Therefore, consideration should also be made regarding whether a referral should also be made to Adult Social Care services for the victim/survivor of abuse.

- Allegations Management – Abuse of Adults at Risk of Harm

Where concerns are raised about someone who works with adults at risk of harm, NCCH must assess any potential risk to these adults who are beneficiaries of the organisation's activities, and, if necessary, to take action to safeguard those adults, whether the allegation or concern is current or historical.

If an NCCH staff member, trustee or associated personnel (a 'person in a position of trust') is alleged to have abused or harmed an 'adult at risk', or may pose a risk of abuse to an 'adult at risk', it is essential that the concerns are appropriately reported and responded to.

Examples of concerns could include allegations that relate to a person who has:

- Behaved in a way that has harmed, or may have harmed an 'adult at risk'.
- Committed a criminal offence against, or related to, an 'adult at risk'.
- Behaved towards an adult in a way that indicates they may pose a risk of harm to an 'adult at risk'.

Concerns could also arise from the person's home / personal life, as well as within their work and may include situations such as:

- A person has behaved (or is alleged to have behaved) towards another adult in a way that indicates they may pose a risk of harm to an 'adult at risk'. For example, this may include situations where a person is being investigated by the police for domestic abuse to a partner and also undertakes voluntary work with 'adults at risk'.
- A person has behaved (or is alleged to have behaved) towards children in a way that indicates that they may pose a risk of harm to an 'adult at risk'. For example, this may include situations where a person is alleged to have abused a child, and is a student undertaking professional training to work with 'adults at risk'.
- A person is the subject of a formal safeguarding enquiry into allegations of abuse, neglect, or exploitation which have occurred in one setting. However, there are also concerns that the person is employed, volunteers or is a student in another setting where there are 'adults at risk'.

When a person's conduct towards an adult may impact on their suitability to work with or continue to work with children, this must also be referred to the Local Authority Designated Office. The purpose of the process is to ensure that risks potentially posed by the person are appropriately managed, alongside the specific safeguarding needs of the adult at risk.

Allegations must be investigated promptly. In the interests of transparency and accountability, NCCH will ensure clear recording of decisions and recommendations arising from the investigation.

For a clear step-by-step flowchart laying out the reporting procedure pathway for Allegations Management in the case of Abuse of Adults at Risk, please see Appendix IV.

IV. Allegations Management – Abuse of Adults at Risk. *Please view PDF Flowchart at:*

<https://ncch.org.uk/uploads/Appendix-IV.-NCCH-SAFEGUARDING-PROCEDURE-FLOWCHART-Allegations-Management--Abuse-of-Adults-at-Risk.pdf>

- Adult Social Care Contacts

If it is judged that an adult at risk of harm is currently at risk of abuse, and/or may not have the capacity to judge whether they are in risky situations, a referral should be made to Adult Social Care services via the local authority website. NCCH will also seek advice from the local council's Adult Social Care team. Adult Social Care contacts can be found via :

<https://www.nhs.uk/service-search/other-health-services/local-authority-adult-social-care/>

- Further resources

Leading UK Authority on Safeguarding Adults: <https://www.anncrafttrust.org/>

3. ENABLING REPORTS

Any NCCH staff, trustees and associated personnel reporting concerns via the following steps will be protected and supported in line with **NCCH's Whistleblowing Policy** section entitled 'Policy Safeguards', and will be given any needed additional support via qualified professionals and suggested professional advice lines (useful guidance here <https://www.anncrafttrust.org/help-advice/friend-relative/>) for those who witness and report a safeguarding incident/disclosure.

NCCH will also accept complaints from external sources such as members of the public, partners and official bodies through our NCCH Complaints procedure (as outlined in Comments, Complaints & Compliments Policy).

- How to report / respond to a safeguarding concern

NCCH encourages its staff, trustees and associated personnel to follow these basic principles around responding to disclosures and reports:

- Always make sure the person speaking up feels they're being listened to and supported
- Don't promise to keep information confidential between you and them. Refer to and follow the organisation's procedures to make sure information is only shared with people who need and have the right to know
- Ask for their consent to share the information – if they refuse and you are still worried that they or someone else is at risk of harm, you cannot wait for this consent. You must share this information to the person responsible for safeguarding in your organisation
- Tell the Designated Safeguarding Lead about any concerns so they can decide what the next steps are
- Write a clear statement of what you have been told, seen, or heard. What to include:
 - Who is making the report.

- When the report was made
 - What the concern is (using the 'who, what, where, when' method).
 - Why they were concerned.
- When you've been told something is wrong, don't go straight to the person that's been reported. Instead, tell the Designated Safeguarding Lead.

NCCH expects the reporting of safeguarding concerns to be completed in the first instance by email or in an emergency by phone. Names should not be included in full via email but followed up with a conversation. Reports should be as detailed as possible in order to enable a decision to be made.

To support and guide NCCH staff, trustees and associated personnel through the process of reporting a safeguarding concern, and to support NCCH senior staff, and Designated Safeguarding Lead/s, and the Board of Trustees in taking the right steps to respond to reported concerns and escalation process, the organisation has designed a set of flowcharts, as mentioned earlier in this document, which cover the following **Appendices**:

i. Disclosure of Abuse Made by a Child

ii. Allegations Management – Abuse of Children

iii. Disclosure/Observation of Adults at Risk

iv. Allegations Management – Abuse of Adults at Risk

These will be made easily accessible to all staff, trustees and associated personnel as digital copies, and will be provided (as required as hard copies) for any facilitating staff at physical NCCH events, and residential activities.

In certain circumstances when it is felt that a specific, tailored pathway is appropriate – for example in a partnership project situation or a specific type of event – NCCH will create customised flowcharts to be used for that specific activity, and make all staff, trustees and associated personnel aware of this specific recommended procedure.

Other Referenced NCCH policies (Available on request)

- Anti-Harassment and Bullying Policy
 - Whistleblowing Policy
 - Acceptable Usage Policy
 - Safer Recruitment Policy
-
- Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only and should be kept secure at all times.

However, confidentiality is not a bar to sharing information regarding adult and child protection. A consultation with the Designated Safeguarding Lead is not a breach of confidentiality and should be a consideration for any member of staff, trustee or associated personnel when coming across a safeguarding concern.

Data protection considerations are not a barrier to making safeguarding referrals. The UK [General Data Protection Regulation \(UK GDPR\)](#) based on the Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children, young people and adults 'at risk of harm' safe. It makes clear that safeguarding is a key consideration when deciding when and what data to share within and between organisations.

UK GDPR, and the Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately. As such confidentiality is important, information should only be shared with those who need to know.

Sharing information effectively:

- any NCCH staff, trustees and associated personnel should be confident of the processing conditions, which allow them to store, and share, the information that they need to carry out their safeguarding role. Information which is relevant to safeguarding will often be data which is considered 'special category personal data' meaning it is sensitive and personal
- where NCCH staff, trustees and associated personnel need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent
- information can be shared legally without consent, if a NCCH staff member, trustee and associated personnel is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.
- relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.

When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is necessary to be of use is a key element of the UK GDPR and Data Protection Act 2018, and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester.

How to identify how much information to share

- Distinguish fact from opinion

- Ensure that you are giving the right information to the right individual
- Ensure where possible that you are sharing the information securely
- Where possible, be transparent with the individual, informing them that the information has been shared, as long as doing so does not create or increase the risk of harm to the individual.

For more guidance on information sharing visit

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

- Report Retention

Once a report has been made or information shared we must consider the storage and retention of this data.

Types of report could include:

- an internal incident report
- a referral report to social services
- a referral report to the police
- a report to the Charity Commission or other organisations.

Where no legal requirement to retain information beyond the closure of the record exists, NCCH will not hold information longer than 6 years after the subjects last contact.

Exceptions to the 6-year period will occur when records:

- Need to be retained because the information in them is relevant to legal action that has been started
- Are required to be kept longer by law
- Are archived for historical purposes (e.g. where NCCH was party to legal proceedings or involved in proceedings brought by a local authority)
- Consist of a sample of records maintained for the purposes of research
- Relate to individuals and providers of services who have, or whose staff, have been judged unsatisfactory
- Are held in order to provide, for the subject, aspects of his/her personal history (e.g. where the child might seek access to the file at a later date and the information would not be available elsewhere)."

In some rare circumstances, information may be indefinitely, but if this is the case, there should be a review process scheduled at regular yearly intervals to ensure data is not retained where it is unnecessary to do so. When records are being kept for more than the 6-year period, files need to be clearly marked and the reasons for the extension period clearly identified.

Staff personal data is kept in accordance with NCCH's Data Protection Policy, however in regard to safeguarding data retention, it is important that NCCH keeps a clear and comprehensive summary of any allegations made, details of how the allegations were

followed up and resolved, and of any action taken and decisions reached. This should be kept in a NCCH staff, trustees and associated personnel confidential personnel file and a copy should be given to the individual. Such information should be retained on file, including for people who leave the organisation, at least until the person reaches normal retirement age, or for 10 years if that is longer.

The purpose of this record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where a future DBS disclosure reveals information from the police that an allegation was made but did not result in a prosecution or a conviction. It will also prevent unnecessary re-investigation if, as sometimes happens, allegations resurface after a period of time.

4. E-SAFETY PROCEDURES

It is important to be aware of the risks of vulnerability and exploitation through the use of I.T. NCCH staff, trustees, and associated personnel must be alert to the potential risks that children and 'adults at risk' may be exposed to, and see that steps are taken to mitigate the risk of this occurring via:

- Content – e.g. exposure to age-inappropriate material, inaccurate or misleading information, socially unacceptable and illegal material (e.g. inciting violence, hate, intolerance, radicalisation, images of abuse).
- Contact – e.g. grooming using communication and social media leading to inappropriate behaviour or abuse.
- Commerce – exposure to inappropriate advertising, online gambling, identity theft and financial scams.
- Culture – bullying via websites/social media, mobile phones and other communication technologies, inappropriate downloading of materials, exposure to inappropriate advertising, online gambling and financial scams.

Staff, trustees and associated personnel must ensure that their personal online social media, messaging and email accounts/profiles do not include children or 'adults at risk' contacted via their work with NCCH. **This is in line with NCCH's Acceptable Usage Policy.**

5. SAFEGUARDING PHOTOGRAPHY/FILMING PROCEDURES

Photographs/Filming of children or 'adults at risk' must never be taken without permission and those wishing to be excluded from photographs/filming must be dealt with in a sensitive way.

At the NCCH we abide by the following procedures for permission to take photos or film children or 'adults at risk':

- Gain permission from parents/guardians/carers and the young people/adults at risk
- Granted permission will be given via NCCH's Consent and Release Form
- Make sure the purpose and timeframe for using the images/footage are noted and agreed
- If the purpose or timeframe is changed then new permissions must be obtained
- Focus on activity rather than on close-ups of young people/ adults at risk as much as

- possible
- Photographs or moving images should represent young people/adults at risk with respect and dignity
- Not to take photographs or moving images of young people/adults at risk who are on a Protection Register
- Store photographs and moving images in a secure place with controlled access
- Not to allow photographers/image creators unsupervised access
- To ensure all authorised photographers/image creators wear appropriate identification
- Not to fully name images of young people/adults at risk unless otherwise agreed
- To be able to take photos/footage of events in public spaces but wherever possible make members of the public aware and give them the option to opt out of the images

A growing area of concern is mobile camera phones. NCCH has the policy that the use of cameras during activities with young people/adults at risk needs to be agreed with the individuals, parents, guardians or carers present. If this is not agreed by all parties photographs/film should not be taken at any time.

NCCH expects all collaborating partners to abide by these Photography/Filming Procedures to safeguard any children and adults at risk. NCCH will ask all partners to confirm their rights and use of any photography or images which are shared, or alternatively NCCH may ask partners to use NCCH's Consent and Release Forms if required for a partnership project involving children and/or adults at risk.

Images together with photo credits and/or consent forms are stored by NCCH in a password protected google drive image bank, however NCCH is aware things may change over time for children, and adults at risk, so NCCH's image bank is reviewed every 6 years, and any image NCCH holds which includes children and adults at risk are deleted after a 6 year period, preventing the future use of images (outside of any original remit of publication).

A request for a withdrawal of any images (and withdrawal of consent whether by the individual, parents, guardians, carers or other nominated individual on behalf of those featured) will always be honoured by NCCH within 30 days of any request received by NCCH via Info@ncch.org.uk.

6. NCCH PROGRAMME STRANDS AND DELIVERY PROCEDURES

Some of our more active organisational risks surrounding safeguarding is our programme strands and activities, these include:

- Delivery of bespoke programmes (e.g.Huddles)
- Network meetings or training sessions (e.g Hives)
- Events & Conferences (including conference workshops)
- Evaluation/research with individuals or small groups from at risk groups
- Advice and guidance from those with lived experience
- Partnership working and project delivery through an external partner

In order to create a safe environment for its programme activities and events (including online programmes), NCCH will put in place (and keep a record) for any programme or

activity which includes children and/or adults at risk the following safeguards as required:

- Risk assessments, which will be put in place prior to any event, programme or project and will include (but not limited to): buildings and accommodation, attendees, activities and context and will look to mitigate, assess and take action.
- Scheduled time for staff, trustees and associated personnel to discuss and agree safe facilitation practice and safeguarding, before any programmed event/project, this could include for example a consideration of care agreement with participants.
- Appropriate participant/attendee surveys to gather information before the event if needed, e.g. emergency contact details.
- Information packs for NCCH staff, trustees and associated personnel providing safeguarding information, venue health and safety information, risk assessments, and safe facilitation guidelines specific to the activity.
- For instances where NCCH staff, trustees or associated personnel will be delivering an activity in direct contact with 'adults at risk' or children, that NCCH confirms they have a clear, current DBS check and any relevant training is completed before the activity begins.
- If working with partners, NCCH will seek safeguarding assurance through formal and binding safeguarding clauses in partnership agreements, evidence of policies & procedures, as well as structured conversations, and through group meetings about collaboratively managing safeguarding at the beginning of any partnership working, and throughout the period of the active partnership. In addition, NCCH will ask all collaborating partners delivering work which includes any 'regulated activity' with children and adults at risk, and/or to any partner collaboration where there may be potential risk to safeguarding, to read and sign [NCCH's Safeguarding Code of Conduct Agreement and Declaration of Disclosure for Collaborating Partners](#), and will actively request a Safeguarding Meeting with collaborating partners to inform our [NCCH Collaborative Safeguarding Risk Mapping Tool](#), which risk assesses the context in which the programme/project is to take place and to identify any risks and issues related to safeguarding within these contexts. This assessment would include collaboratively creating a bespoke Safeguarding Reporting Flowchart.
- Continue to actively reflect on NCCH's Safeguarding policy and procedures through its programme strands and delivery procedures, gathering learning, asking for partnership feedback and re-adjusting systems and processes if necessary.