



SAFEGUARDING POLICY STATEMENT

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| Type of policy | Clinical |
| Owner | Director of Nursing and Care – Sally Hayes |
| Originator | Chief Executive Officer |
| Date created | December 2023 |
| Date of last review | June 2025 |
| Reviewed by | Director of Nursing and Care – Sally Hayes |
| Date of next review | June 2026 |
| Where policy is filed | Hive / website |

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| Main Headings | <ol style="list-style-type: none"> 1. Policy Statement 2. Purpose of the Policy 3. Roles and Responsibilities 4. Categories of Abuse 5. PREVENT duty 6. Monitoring and Review 7. Training 8. The Legal Framework 9. Digital Safeguarding 10. Information sharing and confidentiality 11. Safer recruitment 12. Whistleblowing 13. Incident reporting/ Incorporating PSIRF into Safeguarding Investigations 14. Managing allegations against Staff/ Volunteers 15. Accessibility 16. References <p>Appendix – Safeguarding Flow Chart</p> |
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Signed:

Date: 23.06.2025

Mark Stowe, Interim Chief Executive Officer

1. POLICY STATEMENT

Helen & Douglas House is committed to safeguarding every child and adult who may be at risk of abuse, harm or neglect who encounters the organisation. Helen & Douglas House recognises that it has duty of care to safeguard children and adults from abuse, harm or neglect. Helen & Douglas House acknowledges its duty to act appropriately regarding any allegation(s) made against anyone working on its behalf and to any disclosures or suspicion of abuse.

Helen & Douglas House believes that:

- the welfare of all children and young people is paramount
- all people, regardless of age, ability, gender, racial heritage, religious or spiritual beliefs, sexual orientation and /or identity, have the right to equal protection from harm or abuse
- some people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- working in partnership with their children, their parents, carers and other agencies is essential in promoting people's welfare
- adults who may be at risk should be at the centre of any decision making

Helen & Douglas House recognises its responsibility to provide staff and volunteers with a framework for safeguarding and its responsibility to provide training and support to all staff and volunteers throughout the organisation.

In addition to recognising physical and emotional risks, it includes the potential dangers associated with online platforms and digital communication. This broader scope reinforces our commitment to safeguarding individuals across all aspects of their lives, including the virtual environment, and provides staff with the necessary understanding to address emerging risks effectively.

This policy has been developed in accordance with the principles established by legislation and guidance (see section 5).

This policy applies to all staff, namely anyone in a position of trust, Trustees, paid staff, volunteers, sessional workers, agency staff, students and contractors.

A child is defined as a person under the age of 18 (Children Act 1989).

An adult at risk is defined as a person aged 18 years or over who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

This policy should be read alongside organisational policies and guidance on:

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| <ul style="list-style-type: none"> • Recruitment • Recording, storing and sharing information • Confidentiality • ICT, Social Media • Photography | <ul style="list-style-type: none"> • Health and Safety • Harassment • Whistleblowing • Training, supervision and support • Fundraising |
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2. PURPOSE OF THE POLICY

The purpose of this policy is to:

- protect people who are associated with Helen & Douglas House including the children who use our services, relatives of the children who use our services, staff, volunteers, customers and supporters
- provide guidance to all staff, namely Trustees, paid staff, volunteers, sessional workers, agency staff, students, contractors, or any other person in a position of trust about the overarching principles which guide our approach to safeguarding and child protection

To keep people safe, Helen & Douglas House will:

- provide a setting where people feel listened to, safe, secure, valued and respected
- appoint a Designated Safeguarding Lead and ensure a clear line of accountability regarding safeguarding concerns
- ensure that all those in a position of trust are provided with up to date and relevant information, training, support and supervision to enable them to fulfil their role and responsibilities in relation to safeguarding and child protection
- provide a clear procedure to follow when safeguarding and child protection concerns arise ensuring the sharing of information appropriately across the organisation
- ensure effective and appropriate communication between all of those involved in safeguarding an individual
- build strong partnerships with other agencies to promote effective and appropriate multi-agency working, information sharing and good practice

This policy aligns with the six safeguarding principles outlined in the Care Act 2014:

Empowerment, Prevention, Proportionality, Protection, Partnership, and Accountability.

These principles underpin all safeguarding activities within Helen & Douglas House, ensuring that safeguarding interventions are person-centred, proactive, and proportionate to the risks identified. The organisation works collaboratively with NHS Integrated Care Systems (ICS) and local safeguarding boards to ensure consistency with national safeguarding frameworks and guidance

3. ROLES AND RESPONSIBILITIES

All individuals in a position of trust must:

- understand the different types of abuse and recognise the possible risks and indicators
- understand their responsibility to report any concerns that a person is being, or is at risk of being, abused or neglected. This includes reporting any concern they may have regarding another person's behaviour towards a child or children or an adult at risk
- when appropriate liaise with other agencies, contribute to safeguarding assessments and attend child protection meetings / core groups / conferences
- record and store information legally, professionally, and securely in line with organisational policies and procedures
- undertake the required level of training for their role

- understand the line of accountability for reporting safeguarding concerns and be fully aware of Helen & Douglas House's Designated Safeguarding Lead and their role within the organisation

The **Board of Trustees is accountable** for ensuring that settings provided by Helen & Douglas House are safe by the adoption of a Safeguarding Policy and by ensuring the implementation of effective safeguarding procedures.

Operational accountability for safeguarding issues within Helen & Douglas House lies with the Chief Executive Officer. This responsibility is delegated to the Director of Nursing and Care who is the designated person for the organisation.

The Director of Nursing and Care is responsible for ensuring that safeguarding policies and procedures are in place and that the delivery of the service is in line with these.

Medical Director - The medical Director and medical team do not complete official safeguarding medicals but do complete routine body mapping on admission and where appropriate.

Safeguarding Team

The Safeguarding Team is comprised of staff members who have additional knowledge and skills of safeguarding in practice. Membership:

Director of Nursing and Care– Safeguarding Lead

Medical Director

Consultants

Members of the Senior Clinical Team

Social Worker(s)

Head of Professional Development

Quality and compliance Lead

Head of Community & Family Support Services

Head of retail and trading

Safeguarding Steering Group Aim

Through continuous development, learning and monitoring to ensure that Helen & Douglas House is a safe organisation for service users, staff, volunteers, and supporters. Membership of the steering group involves the safeguarding team as above.

Members of the Safeguarding Team and Safeguarding Steering Group are responsible for ensuring that staff within the organisation are aware of the policies and procedures. Line managers are responsible for ensuring that all staff have completed mandatory training applicable to their levels of responsibility.

Safe Recruitment

The Director of Support Services is responsible for ensuring that safer recruitment policies and processes are in place. Safer recruitment is central to safeguarding people. This includes ensuring that Helen & Douglas House adopts safe recruitment and selection procedures which prevent unsuitable persons from gaining access to children and adults at risk.

In addition to the outlined responsibilities for clinical and senior staff, this policy provides clear guidance for non-clinical staff, volunteers, and contractors in identifying and reporting safeguarding concerns. These individuals are often in positions of trust and may witness safeguarding issues. To address this, a clear reporting pathway and procedures for escalating concerns have been included, ensuring that all members of the organisation understand their roles and responsibilities in maintaining a safe environment.

4. CATEGORIES OF ABUSE

The main categories of abuse in safeguarding are typically divided into those affecting children and adults. These categories are outlined in safeguarding legislation and guidance, such as the Children Act 1989, Care Act 2014, and Working Together to Safeguard Children (2018). Below are the main categories:

4.1. For Children:

- Physical Abuse- Deliberate physical harm or injury to a child, such as hitting, shaking, or poisoning. It can also include fabricating symptoms or deliberately inducing illness.
- Emotional Abuse- Persistent emotional maltreatment that adversely affects a child's emotional development. Examples include verbal abuse, humiliation, bullying, or causing a child to feel worthless or unloved.
- Sexual Abuse- Forcing or enticing a child to take part in sexual activities, whether they are aware of it or not. This includes physical contact, non-contact activities (e.g., grooming or exposing a child to sexual content), and online abuse.
- Neglect- Persistent failure to meet a child's basic physical and emotional needs, such as food, clothing, shelter, medical care, or supervision, which results in harm to their health or development.
- Child Sexual Exploitation (CSE)- A form of sexual abuse where children are manipulated or coerced into sexual activity in exchange for money, gifts, or other incentives.
- Child Criminal Exploitation (CCE)- Involves coercing children into criminal activities, such as drug trafficking (county lines), theft, or other illegal acts.
- Online Abuse- Abuse conducted via the internet or digital platforms, including cyberbullying, grooming, or exposure to harmful content.
- Female Genital Mutilation (FGM)- is a form of child abuse and a severe violation of human rights, and is committed to identifying, reporting, and supporting individuals at risk of or affected by FGM, in line with legal obligations and safeguarding guidelines.

4.2. For Adults at Risk:

- Physical Abuse- Non-accidental harm, such as hitting, slapping, misuse of medication, or restraint.
- Emotional or Psychological Abuse- Acts causing emotional distress, such as threats, humiliation, intimidation, or controlling behaviour.

- Sexual Abuse- Non-consensual sexual contact or activity, including sexual assault, harassment, or exploitation.
- Neglect or Acts of Omission- Failure to meet an adult's basic needs, including providing adequate care, food, medication, or assistance.
- Financial or Material Abuse- Illegal or improper use of an individual's funds, assets, or property, such as theft, fraud, or coercion in financial matters.
- Discriminatory Abuse- Unequal or unfair treatment based on characteristics such as race, gender, age, disability, sexual orientation, or religion.
- Organisational Abuse- Mistreatment within an institution or care setting, involving poor practice, neglect, or abuse by the system or individuals in positions of trust.
- Domestic Abuse- Abuse occurring within intimate or family relationships, including physical, emotional, sexual, or financial abuse. This includes coercive and controlling behaviour.
- Self-Neglect- A person neglecting their own personal care, health, or environment, which may pose risks to their well-being.
- Modern Slavery- Exploitation through forced labour, human trafficking, or servitude.

4.3. Shared Concerns (Affecting Both Children and Adults):

- Bullying and Cyberbullying
- Radicalisation and Extremism
- Human Trafficking
- Forced Marriage
- Exploitation (e.g., labour or Sexual exploitation)

5. PREVENT DUTY

The organisation is committed to fulfilling its obligations under the PREVENT duty, a key component of the UK's counter-terrorism strategy aimed at preventing individuals from being drawn into terrorism. PREVENT is integral to safeguarding, as it addresses vulnerabilities that may lead to radicalisation and exploitation.

All staff and volunteers are required to recognise and act upon concerns where individuals may be at risk of being influenced by extremist ideologies. This includes identifying early signs of radicalisation, reporting concerns through the appropriate safeguarding channels, and working collaboratively with external agencies such as the local Prevent team and Channel programme. The organisation ensures that staff and volunteers receive training to build awareness of the PREVENT duty and their responsibilities, fostering an environment of vigilance and proactive intervention to protect vulnerable individuals.

All concerns are escalated through the Designated Safeguarding Lead for appropriate action

6. MONITORING AND REVIEW

The safeguarding policy will be reviewed annually by the Director of Nursing and Care to ensure it remains aligned with statutory guidance and best practices. Independent audits and feedback from staff, volunteers, and service users will inform updates to the policy. Key performance indicators, such as training compliance rates, lessons learnt and safeguarding incident resolution times, will be monitored and reported quarterly to the Clinical Governance Committee and Safeguarding Steering Group. This ensures a cycle of continuous improvement and responsiveness to emerging risks.

7. TRAINING

Helen & Douglas House is committed to ensuring all staff, volunteers, and trustees are equipped with the necessary safeguarding knowledge and skills. Mandatory safeguarding training will be delivered annually, with differentiated levels tailored to specific roles and responsibilities. For example, Level 3 training will be provided for clinical staff, while Level 1 training will be required for all non-clinical staff and volunteers. A competency framework, based on NHS guidelines, will be used to monitor and assess training effectiveness for clinical staff.

This policy mandates safeguarding training for all individuals in positions of trust, with annual updates to ensure content aligns with current legislation and best practices. A robust monitoring system is in place to identify gaps in training compliance and address them promptly through refresher sessions. This ensures that all staff and volunteers are equipped with the knowledge and skills needed to recognize and respond effectively to safeguarding concerns.

The Board of Trustees is responsible for ensuring robust safeguarding practices and overseeing compliance with statutory requirements. Audits will be conducted annually to review safeguarding processes, and findings will be reported to the Board. Additionally, Helen & Douglas House will engage with NHS safeguarding leads and local authority safeguarding boards to ensure external scrutiny and alignment with multi-agency safeguarding standards.

The Director of Nursing and Care and Medical Director each have access to external safeguarding supervision through system partners .

8. THE LEGAL FRAMEWORK

This policy has been developed in accordance with the principles established by the following legislation and guidance:

Children

- Children Act 1989
- Children and Families Act 2014
- Domestic Abuse Act 2021
- United Nations Convention on the Rights of the Child 1991
- GDPR and Data Protection Act 2018
- Human Rights Act 1989
- Children Act 2004
- Equality Act 2010
- Introductory guide to safeguarding and child protection for voluntary and community sector 2022
- Safeguarding and protecting people for charities and Trustees 2021
- Special educational needs and disability (SEND) code of practice: 0 to 25 years
- What to do if you are worried a Child is being Abused 2015
- Working Together to Safeguard Children 2023
- Keeping Children Safe in and out of school settings Code of Practice 2021
- Oxfordshire Safeguarding Children Board guidelines
- [NHS England » Safeguarding children, young people and adults at risk in the NHS](#)

Adults

- Care Act 2014
- Domestic Abuse Act 2021
- GDPR and Data Protection Act 2018
- Health and Care Act 2022
- Rehabilitation of offenders Act 1975
- Safeguarding Vulnerable Groups Act 2006
- Human Rights Act 1989
- Mental Capacity Act 2005
- Mental Capacity (Amendment) Act 2019
- Charity Commission 2019 Safeguarding and protecting people for charities and trustees
- Code of Fundraising Practice, Fundraising Regulator

9. DIGITAL SAFEGUARDING

As part of our safeguarding strategy, Helen & Douglas House recognises the increasing risks associated with digital platforms and emerging technologies. Measures are in place to protect children and vulnerable adults from online abuse, including cyberbullying, grooming, and exposure to harmful content. Staff are trained to identify digital safeguarding risks and respond appropriately, with robust ICT policies and monitoring systems ensuring safe use of technology across the organisation

10. INFORMATION SHARING AND CONFIDENTIALITY

The safeguarding policy emphasizes the importance of maintaining confidentiality while fulfilling the duty to share relevant information with external agencies to protect individuals from harm. A clear protocol, guided by data protection laws such as GDPR, outlines when and how information should be shared. This includes a decision-making flowchart to support staff in navigating complex scenarios and ensuring that information sharing is both legal and effective.

11. SAFER RECRUITMENT

The policy outlines a safer recruitment process, including mandatory Disclosure and Barring Service (DBS) checks for all applicable roles and periodic re-checks for high-risk positions. Additionally, robust vetting procedures and ongoing monitoring of staff suitability ensure that only individuals with the appropriate background and values are entrusted with roles involving vulnerable individuals. This approach underlines our commitment to preventing unsuitable persons from gaining access to children and adults at risk.

12. WHISTLEBLOWING

Helen & Douglas House fosters an open culture where all staff and volunteers feel confident to raise concerns about safeguarding practices without fear of reprisal. A whistleblowing policy provides clear guidance on how to report concerns, with access to independent advice through Public Concern at Work. Anonymity will be protected wherever possible, and all whistleblowing concerns will be investigated promptly and transparently, with outcomes communicated to relevant stakeholders including trustee lead. Two members of non-clinical staff and one Trustee are trained as Freedom to Speak up (FTSU) guardians.

13. INCIDENT REPORTING- SAFEGUARDING INVESTIGATIONS

PSIRF emphasises a systems-based approach to understanding and addressing incidents, ensuring that investigations are not solely focused on individual accountability but on identifying underlying factors and systemic issues that may contribute to safeguarding concerns. All

safeguarding incidents will be recorded using the organisation's centralised reporting system, ensuring a consistent and transparent approach. Incident data will be reviewed quarterly by the Safeguarding Steering Group to identify trends, learning opportunities, and areas for improvement. Findings, including learning points, from safeguarding reviews will be included in an annual safeguarding report to the Board and shared with external stakeholders, including the NHS ICS Safeguarding Lead, to promote transparency and accountability

The Patient Safety Incident Response Framework (PSIRF) will be utilised to guide safeguarding investigations within the organization.

When a safeguarding incident occurs, the PSIRF process will be employed to conduct a thorough and structured analysis, involving all relevant stakeholders, to identify lessons learned and implement meaningful changes. This approach fosters a culture of transparency, continuous learning, and improvement, ensuring that safeguarding practices remain robust and responsive to risks. Additionally, findings from safeguarding investigations under PSIRF will be shared through appropriate governance channels, such as the Safeguarding Steering Group, to enhance organizational learning and prevent recurrence of similar incidents.

14. Allegations against staff or volunteers

Helen & Douglas House takes all allegations against staff and volunteers seriously and manages them in accordance with statutory guidance, including *Working Together to Safeguard Children* (2023), the Charity Commission's safeguarding expectations, and local safeguarding partnership procedures.

Any allegation that a person working on behalf of the organisation may have:

- behaved in a way that has harmed or may harm a child or adult at risk,
- possibly committed a criminal offence against, or related to, a child or adult at risk, or
- behaved in a way that indicates they may pose a risk to children or vulnerable adults,

will be reported immediately to the Designated Safeguarding Lead (DSL), who will contact the Local Authority Designated Officer (LADO) within one working day. This applies to all staff, including trustees, contractors, agency staff, students, and volunteers, regardless of whether they are paid or unpaid.

The individual concerned will be treated with fairness and respect. Where appropriate, suspension from duties may be used as a neutral act to facilitate a thorough, impartial investigation. The organisation will cooperate fully with any external investigation and maintain confidentiality in line with legal and regulatory requirements.

Support will be offered to both the person the allegation is made against and to the affected child or family, recognising the emotional impact on all parties.

In cases where concerns do not meet the harm threshold but indicate inappropriate or concerning behaviour ("**low-level concerns**"), these will be recorded, monitored, and addressed to prevent escalation. This includes concerns such as boundary-blurring, over-familiar behaviour, or breaches of conduct that do not constitute abuse but may pose future risks.

All staff and volunteers have a duty to report concerns about the behaviour of colleagues. If an individual feels that concerns are not being taken seriously or addressed appropriately, they may

escalate through the whistleblowing process or report externally to agencies such as the NSPCC Whistleblowing Helpline (0800 028 0285) or the local authority safeguarding team.

15. ACCESSIBILITY

To ensure inclusivity, this policy will be made available in simplified formats tailored to the needs of different audiences, including children, young people, and individuals with cognitive or communication impairments. Accessible versions include visual aids, easy-read formats, and translations into key languages used by our service users. This approach ensures that everyone can understand their rights and how to access support if safeguarding concerns arise.

16. REFERENCES

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<https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

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Department for Education (2023). *Working Together to Safeguard Children: Statutory Framework for Multi-Agency Working to Safeguard and Promote the Welfare of Children.* [Online] Available at: <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

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Information Commissioner's Office (ICO). *Guide to the UK General Data Protection Regulation (UK GDPR).* [Online] Available at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>

National Institute for Health and Care Excellence (NICE). *Child Abuse and Neglect [NG76].* [Online] Available at: <https://www.nice.org.uk/guidance/ng76>

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UK Government (1974). *Rehabilitation of Offenders Act 1974*. [Online] Available at: <https://www.legislation.gov.uk/ukpga/1974/53>

UK Government (2018). *Data Protection Act 2018*. [Online] Available at: <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

Appendix – Safeguarding Flow Chart

It's everyone's business

Meet your safeguarding team

If you see or hear anything that makes you feel worried about a child, young person or adult, even if it doesn't seem important, please talk to a member of our safeguarding team about it as soon as possible.



We are here to support and advise you on what to do. We're available Monday to Friday from 9:00am until 5:00pm.

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| <p>Sally Hayes Director of Nursing & Care Designated Safeguarding Officer</p> | <p>Dr Emily Harrop Medical Director and Consultant in Paediatric Palliative Care</p> | <p>Katrina Williams Head of Care</p> | <p>Andrea Revell Social Worker</p> | <p>Sue Simpson Social Worker</p> | <p>Sommia Chand Quality and Compliance Lead</p> | <p>Debbie Kelly Head of Community Services</p> | <p>Dr Laura Nohavicka Consultant in Paediatric Palliative Care</p> | <p>Catherine Mezzetti Head of Professional Development</p> |

To contact us please speak to a member of the team or call 01865 794749.

If you are concerned about the immediate safety of a child, or you can't get hold of the safeguarding team, don't wait, call your local MASH (Multi-Agency Safeguarding Hub) without delay.

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| Oxfordshire: 0345 050 7666 | Reading: 0118 937 3641 |
| Buckinghamshire: 01296 383962 | Wiltshire: 0300 4560108 |
| Windsor and Maidenhead: 01628 683150 | Gloucestershire: 01452 426565 |
| Wokingham: 0118 908 8002 | |

If you are concerned about an adult, please call:

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| Oxfordshire: 01865 328232 | Slough: 01753 475111 |
| Buckinghamshire: 0800 137 915 | Wokingham: 0118 974 6772 |
| West Berkshire: 01635 519056 | Reading: 0118 937 3747 |
| Windsor and Maidenhead: 01628 683744 | Wiltshire: 0300 456 0111 |
| Bracknell: 01344 351500 | Gloucestershire: 01452 426868 |

For full details visit the Hive (login required)



For further information, please refer to the Helen & Douglas House Safeguarding policies available on the Hive at hdh.org.uk/safeguarding_hive

Registered charity no 1085951
Int. 03.2025