SAFEGUARDING POLICY

Policy statement

Tilehouse Counselling is committed to promoting best practice, ensuring that children and vulnerable adults accessing our service are safeguarded from harm and abuse. Where harm or abuse is recognised or suspected, Tilehouse Counselling expects staff and volunteers to respond and refer in accordance with this policy and operational procedures.

Tilehouse Counselling adopts procedures defined by Hertfordshire Safeguarding Adults Board and Hertfordshire Safeguarding Children Partnership and statutory legislation to ensure that its own policies and practices are effective - both in terms of preventing abuse and to ensure that cases of alleged/suspected abuse are reported promptly.

In line with the Care Act 2014, Tilehouse Counselling seeks to underpin safeguarding practice with the six safeguarding principles:

- Empowerment – people should be supported and encouraged to make their own decisions through informed consent over the intended outcome
- Prevention – working together to take action before harm occurs
- Proportionality – the least intrusive response appropriate to the risk presented
- Protection – support and representation for those in need
- Partnership – local solutions through services working in our communities
- Accountability – everyone must be accountable and transparent in safeguarding practice

Scope

This policy applies to: -

• All personnel - this includes employees, casual and sessional contractors, volunteers and trustees, as well as all other persons supporting, providing, or delivering services for or on behalf of Tilehouse Counselling

• Parent/carer/guardians and service users - abuse can take place in any setting and be perpetrated by anyone. Safeguarding is everyone's business.

Key safeguarding practices

- Vulnerable adults (over 18) - to adhere to the Hertfordshire or Luton Borough and Central Bedfordshire Multi Agency Adult Safeguarding Policy, Practices and Procedures.
- Children (under 18) – to adhere to the Hertfordshire or Central Bedfordshire and Luton Local Safeguarding Children Board/Partnership's Inter-agency Procedures for managing allegations and concerns regarding children and young people.
- To maintain safer recruitment procedures including pre-employment checks: full, enhanced Disclosure and Barring Service (DBS) checks and references

- Ensure that all staff and client-facing volunteers undertake SafeCIC online safeguarding training modules, including PREVENT to recognise symptoms of abuse as part of induction, and are appropriately informed to understand their obligations under this policy
- Ensure that all staff and volunteers are aware of reporting procedures on induction and that, where appropriate, service users understand what abuse is and how to raise a concern
- Recognise that it is the responsibility of everyone covered under the scope of this Policy to prevent exploitation and abuse and to report any abuse discovered or suspected
- Keep safeguarding on the agenda for all staff meetings and 1 -1 reviews with a focus on prevention
- Understand the impact of trauma and aim to ensure that all children, young people and vulnerable adults are welcomed into a caring environment with a safe, positive and friendly atmosphere
- Recognise the responsibility to implement, maintain and regularly review procedures, which are designed to recognise and respond effectively to cases of abuse
- To maintain good links with the statutory safeguarding authorities and ensure organisational co-operation with any concerns.
- Learn from findings from any investigations to prevent abuse and improve practice
- Respond to any breach of safeguarding practice as a potential disciplinary matter
- Ensure that any colleagues, partner organisations, service users or family members who report abuse are taken seriously and offered support if required
- Produce safeguarding reports for the Clinical Governance Group, and exceptionally where an incident has occurred
- The Board is responsible for ensuring that the Safeguarding Policy is appropriate and sufficient and reviewed regularly. Any Policy reviews are to be approved by the Board
- To appoint a designated member of the Board with safeguarding responsibility, a Safeguarding Lead from the Senior Leadership Team (Clinical Lead) with responsibility for implementation of the Policy and a Deputy Safeguarding Lead to act in the absence of the Lead (Operations Manager)
- The policy is to be reviewed annually and in response to any changes in legislation
- Staff to undertake CPD and Safeguarding Lead to maintain knowledge of any heightened safeguarding intelligence of risks locally.

Legal framework

The major pieces of legislation and guidance relevant to this policy and its procedures are:

The Care Act 2014, The Children Act 1989 and 2004, Safeguarding Vulnerable Groups Act 2006, Protected Disclosures Act 2014, Data Protection Act 2018, European Convention of Human Rights, Working Together to Safeguard Children 2023, Mental Capacity Act 2005, Hertfordshire and Central Bedfordshire Adult Safeguarding Board Inter-Agency Procedures, Disclosure and Barring Service, the Hertfordshire, Central Bedfordshire and Luton Local Safeguarding Children Partnerships, Hertfordshire, Central Bedfordshire and Luton Safeguarding Adults Boards.

Categories of abuse

There are many types of abuse, and all result in behaviour towards a person that deliberately or intentionally causes harm. These are violations of an individual's human and civil rights and include:

- Psychological – emotional abuse, threats of harm, humiliation, controlling, coercion, isolation
- Physical – assault, hitting, pushing, restraint
- Sexual – rape, sexual assault, non-consensual acts or being pressured into consenting
- Financial or material – theft, fraud, exploitation or coercion with financial affairs or arrangements, misappropriation of possessions or benefits
- Neglect and acts of omission – ignoring medical or care needs, failure to provide access to appropriate services (health, care, education etc.), withholding necessities of life
- Domestic – threatening behaviours/ abuse between adults who are or have been in a relationship
- Modern slavery – criminal exploitation, domestic servitude, forced labour, sexual exploitation
- Self-neglect – failing to care for personal hygiene, health or surroundings, hoarding
- Discriminatory – on grounds of race, gender and gender identity, disability, sexual orientation, religion, age
- Organisational – neglect and poor care practice within an institution or care setting

Many of our clients have experienced trauma, this increases their vulnerability to exploitation or abuse. The examples for each category listed above are not exhaustive.

21st Century Safeguarding Concerns

The concerns outlined below are high on the safeguarding agenda and particularly target vulnerable children and adults. Staff must be aware of the reporting mechanisms, risk factors, signs and behaviours indicating that a vulnerable child or adult is at risk of or experiencing:

- Child Sexual Exploitation (CSE) - can be perpetrated by individuals or groups, males or females and children or adults. It can range from a one-off opportunistic incident to complex, organised abuse.
- Radicalisation - the process by which a person comes to support terrorism or extremist ideologies, and in some cases, to then participate in terrorist groups. 'PREVENT' is part of the government's counter-terrorism strategy that aims to stop people becoming radicalised.
- County Lines – the exploitation of children by gangs and organised crime networks selling drugs.
- Cuckooing – where drug dealers take over the home of a vulnerable person in the community for use as a base.
- Online abuse – clients are at risk of harm through the use of ICT and social media through cyberbullying, grooming by extremist groups or paedophiles, exposure to unsuitable/ violent material and sexualisation.

Information sharing & decision process

It is everyone's duty to report anything that they suspect to constitute abuse, risk of abuse or neglect, in order for the right action to be taken. Information should be shared with consent where possible; however, rights to confidentiality are not absolute and may be overridden where it is necessary to share information to support an investigation or where there is a risk to the safety and well-being of the person or to others, based on the facts. Information shared must be necessary, proportionate, relevant, accurate, timely and secure. A record of the decision to share or not to share should be kept on the client's file, along with a note of what has been shared with whom and for what purpose.

If any member of staff or volunteer has good cause to know or suspect that:

(a) a client is at risk of abuse

(b) a client has disclosed ongoing abuse

(c) the client is at risk of serious self-harm or suicide

(d) or in the case of under 18's, historic abuse is disclosed or suspected

then the following steps should be taken:

- A discussion needs to take place with the client so that the counsellor is as clear as they can be regarding levels of risk and others involved. The Tilehouse counsellor will need to discuss confidentiality issues and boundaries with the client and remind the client of the boundaries of confidentiality as agreed in the first meeting. They will also discuss with the client Tilehouse Counselling's professional responsibility regarding the safety and wellbeing of the client. Great care needs to be taken in such discussions so as not to undermine the trust in the relationship and to contain, respect and work with the client's anxieties. Disclosures of abuse/risk of harm to outside parties are made with the full prior knowledge of the client, if at all possible.
- If time allows, a discussion about the issue should then be had with the counsellor's Supervisor and with the Designated Person, at the earliest possible opportunity. These discussions are to be noted on the appropriate record together with the actions taken as a result. Counsellors may also use the NSPCC (0808 800 5000) for advice if required.

  If the risk is assessed to be red, the counsellor may need to contact emergency / crisis services prior to the above discussion, dependent on the situation and availability of the Supervisor and Designated Person [see critical incident flow chart at Appendix 1]
- For clients who have been referred to Tilehouse Counselling, once the above steps have been followed, the person with safeguarding responsibility at the referring agency will be informed, where there is such a person. The GP may be informed, and the CMHT or CAMHS if involved with the client. This will be done by the Counsellor, in writing and by telephone if appropriate, and in collaboration with their Supervisor and a Designated Person, next steps are agreed. This will be done with the knowledge of the client at all times if possible.
- If the client is self-referred, then, following the consultative process set out above and if it is decided to be in the best interest of the client, the appropriate contact will be made with Family Services or Social Services. This will be done with the knowledge of the client if at all possible.
- The case will be presented at the monthly meeting of the Clinical Governance Group, and recorded on the client record.

Reporting Procedure

If you are concerned that someone is experiencing or at risk of abuse, in the first instance, speak to your Supervisor or contact the Safeguarding Lead or Deputy (in the Safeguarding Lead's absence) directly, depending on the level of urgency.

Safeguarding Lead (SL): Becky Ireland CEO 07734158050

Deputy Safeguarding Lead (DSL): Natasha Clewley Trustee 07964376972

Out of hours: use contacts from the relevant table below. If you think a crime has been committed against someone unable to protect themselves from abuse, or that a risk is imminent, call the police (emergency call 999, non-emergency situation call 101)

Hertfordshire

To report a concern for under 18's:

Phone:	0300 123 4043
Out of hours:	0300 123 4043
Online:	here

To report a concern for 18 and over:

Phone:	0300 123 4042
Out of hours:	0300 123 4042
Online:	here

Luton Borough

To report a Safeguarding concern for under 18's

Phone:	01582 547653
Out of hours:	0300 300 8123
Email:	mash@luton.gov.uk
Online:	here

To report a concern, phone or complete a Safeguarding Adult Concern form:

Phone:	01582 547730 or 01582 547563
Out of hours:	0300 300 8123
Email:	adultsafeguarding@luton.gov.uk
Online:	here

Central Bedfordshire

To report a concern for under 18's

Phone:	0300 300 8585
Out of hours:	0300 300 8123
Online (BIC100 form):	here

To report a concern for 18 and over

Phone:	0300 300 8122
Out of hours:	0300 300 8123
Email:	adult.protection@centralbedfordshire.gov.uk
Online	here

Reporting concerns about terrorism

If it is an emergency, dial 999. If you suspect it, report it! If you consider anything to be suspicious or connected with terrorism, contact Police on the non-emergency number 101 or the Anti-Terrorist Hotline on 0800 789 321.

Recording

In all safeguarding eventualities, a Safeguarding log must be completed and sent to the Safeguarding Lead (this is automatic when recorded on Lamplight) to enable Tilehouse Counselling to record and accurately report on safeguarding incidents. If you are unable to use Lamplight to record, please use the Client at Risk form and send via email.

When recording incidents, please be accurate, objective and concise. If a safeguarding concern is sufficient to warrant a MASH, IFD, BIC 100, SOVA or MARAC referral, or emergency services have been contacted you must provide the Safeguarding Lead with a copy at the earliest opportunity, followed by the local authority decision as to whether the alleged abuse meets the threshold for an enquiry. These must also be filed electronically in the client file on Lamplight (if you do not have access to upload, please ask the SL or DSL to do so).

Allegations against staff and volunteers

Please discuss any concerns with the Safeguarding Lead. Allegations of abuse will be thoroughly investigated and Tilehouse Counselling staff disciplinary action may result. Tilehouse Counselling is aware that some allegations of abuse are mistaken or false, but we are committed to thorough and fair investigation, involving statutory agencies if necessary. Allegations that are considered to be of a serious nature, will be reported to the LADO (Local Area Designated Officer) by the Safeguarding Lead or Deputy. LADO can be contacted on:

Hertfordshire: 01992 555420 or LADO.Referral@hertfordshire.gov.uk

Central Bedfordshire: 0300 300 8142

Luton Borough: 01582 548069 or here

Lead Trustee for Safeguarding – Responsibilities

The lead trustee for safeguarding takes on three main sets of duties related to safeguarding in addition to their wider responsibilities as a trustee.

Strategic

• Consider the organisation's strategic plans and make sure they reflect safeguarding legislation, regulations specific to your activities, statutory guidance, and the safeguarding expectations of the Charities Commission.

• Work with the CEO and designated safeguarding lead regularly to review whether the things the organisation has put in place are creating a safer culture and keeping people safe.

• Check the organisation's risk register reflects safeguarding risks properly and plans sensible measures to take, including relevant insurance for trustees' liability.

• If your organisation delivers activities that need inspections, be aware of how ready for those inspections you are and respond to any following reports.

• Make sure there is space on the agenda for safeguarding reports and help trustees understand and challenge those reports.

Effective policy and practice

• Make sure there is an annual review of safeguarding policies and procedures and that this is reported to trustees.

• Understand the monitoring your charity does to see whether policies and procedures are effective.
• Call for audits of qualitative and quantitative data (either internal or external) when they're needed.

• Learn from case reviews locally and nationally, to improve your organisation's policies, procedures and practices.

• Oversee safeguarding allegations against staff or volunteers, together with CEO (designated safeguarding lead).

• Be a point of contact for staff or volunteers if someone wishes to complain about a lack of action in relation to safeguarding concerns.

Creating the right culture

• Champion safeguarding throughout the organisation.

• Attend relevant safeguarding training events and conferences.

• Support the trustees in developing their individual and collective understanding of safeguarding.

• Attend meetings, activities and projects to engage with staff, volunteers and beneficiaries to understand safeguarding on the ground.

• Work with the chair, CEO and Clinical Lead in order to manage all serious safeguarding cases.

• Support regular safeguarding updates for staff, volunteers and beneficiaries.

• Make sure you have ways of gathering the views of staff and volunteers in relation to safeguarding and sharing these with the board.

Support from the chair

The chair should make sure that the lead trustee for safeguarding either has the required knowledge, skills, and experience or is supported to develop these.

Appendix 1 – Critical Incident Procedure

CRITICAL INCIDENT PROCEDURE

1. INCIDENT OCCURS

Disclosure is made or incident occurs.
Summon support from a colleague, assess immediate situation & ensure immediate safety of all involved.
Move the affected person to a private area if possible.

2. DECISION (HEALTH RELATED)

Does the situation need emergency intervention? Call 999

E.g. Threat to life, criminal act in progress, fire etc

Does the situation need urgent medical intervention? Call 111

E.g. urgent mental or physical health need. This stage is ideally done with informed consent from the affected person, but a lack of capacity should not prevent help being sought.

2. DECISION (SAFEGUARDING)

Does the situation need emergency intervention? Call 999

E.g. Threat to life, criminal act in progress, fire etc

Does the situation need urgent safeguarding intervention?

- refer to pages 5 & 6 of safeguarding policy for reporting lines

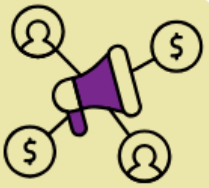
E.g. If a young person is involved/affected., or criminal act has happened in recent past & needs reporting. This stage is ideally done with consent from the affected person, but a lack of capacity or consent should not prevent help being sought / reporting.

3. INFORM

Inform any others relevant parties of situation.

e.g. CEO / Safeguarding Trustee, client's emergency contact anyone else the affected person requests, landlord if building is affected.

This can be done directly by staff or via the office (staff or volunteer)



5. RECORD

Once the immediate incident is resolved, record the incident, decision made and actions taken

For clients, this will be in lamplight using the safeguarding module, with possible addition of an accident form if required and an 'admin' work record for contact with client's emergency contact (eg parents).
For staff, volunteers or members of the public this can be via an accident form sent to the CEO.