

Safeguarding Adults Policy

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Safeguarding Statement

InterAct is committed to safeguarding and promoting the welfare of children, young people, and Adults who use our services, and expects all staff, volunteers and partners to share this commitment. We ensure the welfare of children, young people, and vulnerable adults is paramount by placing them and their needs at the heart of planning and implementing policies, projects and initiatives. This beneficiary-centred approach embeds safeguarding and reinforces our message that safeguarding is everyone's responsibility.

Introduction and Purpose

InterAct believes that a vulnerable adult should never experience abuse of any kind. We have a responsibility to promote the welfare of all vulnerable adults and to keep them safe. We are committed to operating in a way that protects them. This policy will:

- Protect vulnerable adults who receive InterAct's services, including volunteers.
- Provide staff and volunteers with the overarching principles which guide our approach to safeguarding vulnerable adults.
- Ensure that everyone working with InterAct, and anyone receiving support from us, is aware of the responsibilities they and others have - and knows what to do if harm or injury is suspected or is discovered.
- Guide InterAct to work in partnership with others, in order to protect those who are experiencing or at risk of abuse or neglect.
- Safeguard vulnerable adults whilst enabling them to make choices and have control over how they want to live.
- Promote an approach that focuses on improving life for the adults concerned.

Scope

Everyone who works with vulnerable adults has a responsibility to keep them safe. No single individual has a full picture of an individual's needs and circumstances.

If vulnerable adults 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 prompt action.

This policy applies to anyone working on behalf of InterAct, including senior managers and the board of trustees, paid staff, volunteers, sessional workers, agency staff, or students.

Definitions

Safeguarding adults means protecting an adult's right to:

- live safely;
- be free from abuse, neglect, exploitation, and harm; and
- make informed choices about their life and well-being wherever possible.

For the purposes of adult safeguarding, a "**vulnerable adult**" or an "adult at risk" refers to a person aged 18 or over who:

- has needs for care and support;
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those needs, may be unable to protect themselves from abuse, neglect, exploitation, or harm.

InterAct recognises that vulnerability is not fixed and that risks may increase due to factors such as:

- disability;
- neurodivergence;
- mental ill health;
- trauma;
- social isolation;
- communication difficulties;
- coercion or dependency;
- online activity;
- substance misuse;
- financial difficulties; or
- changes in health or personal circumstances.

Legal and Regulatory Requirements

This policy has been developed with reference to:

- Care Act 2014;
- Mental Capacity Act 2005;
- Human Rights Act 1998;
- Equality Act 2010;
- Safeguarding Vulnerable Groups Act 2006;
- Health and Social Care Act 2008;
- Data Protection Act 2018 and UK GDPR;
- Modern Slavery Act 2015;
- Counter-Terrorism and Security Act 2015;
- Serious Crime Act 2015;
- Domestic Abuse Act 2021;
- Protection from Harassment Act 1997;
- Health and Safety at Work etc. Act 1974;
- Care and Support Statutory Guidance;
- Southend, Essex and Thurrock (SET) Safeguarding Adult Procedures;
- Prevent Duty Guidance;
- Charity Commission safeguarding and serious incident reporting guidance; and
- other relevant safeguarding, health and safety, equality, and information-sharing legislation and guidance.

Roles and Responsibilities

Board of Trustees

The Board of Trustees has overall responsibility for ensuring that InterAct:

- maintains effective safeguarding arrangements;
- promotes a positive safeguarding culture;
- meets its legal and regulatory safeguarding responsibilities;
- maintains appropriate safeguarding policies and procedures;
- allocates appropriate safeguarding resources;
- monitors safeguarding risks and concerns; and
- responds appropriately to serious safeguarding incidents.

Chief Executive Officer (CEO)

The CEO is responsible for:

- overseeing implementation of safeguarding arrangements across the organisation;
- promoting a strong safeguarding culture;
- ensuring safeguarding concerns are responded to appropriately;
- supporting safeguarding leads and managers;
- ensuring appropriate reporting and escalation arrangements are in place;
- supporting safer recruitment and workforce safeguarding;
- ensuring staff and volunteers receive appropriate safeguarding support and training; and
- reporting serious incidents to the Board of Trustees and external agencies where appropriate.

Designated Safeguarding Lead (DSL) and Deputy DSL

The DSL and Deputy DSL are responsible for:

- acting as the main points of contact for safeguarding concerns;
- supporting staff and volunteers with safeguarding advice and guidance;
- managing safeguarding referrals and escalation;
- liaising with Social Care, Police, healthcare professionals, and other agencies where appropriate;
- maintaining safeguarding records securely;
- supporting safeguarding risk assessments and safety planning;
- supporting safeguarding training and awareness;
- monitoring safeguarding trends, themes, and concerns;
- promoting professional curiosity and safeguarding culture; and
- ensuring safeguarding concerns are responded to promptly and proportionately.

The DSL and Deputy DSL will also support:

- information sharing decisions;
- safeguarding supervision and support;
- management of allegations or low-level concerns;
- online safeguarding responses; and
- organisational learning following incidents or concerns.

Managers

Managers are responsible for:

- promoting safe, respectful, and inclusive environments;
- supporting staff and volunteers to follow safeguarding procedures;
- responding appropriately to concerns raised;
- escalating safeguarding concerns promptly;
- supporting safeguarding risk management;
- ensuring safeguarding remains part of day-to-day practice and supervision;
- supporting safe activities, trips, transport, and online engagement; and
- promoting professional boundaries and appropriate conduct.

Staff and Volunteers

All staff and volunteers have a responsibility to:

- safeguard adults at risk;
- remain alert to signs of abuse, neglect, exploitation, or harm;
- follow safeguarding policies and procedures;
- report concerns promptly;
- maintain professional boundaries;
- participate in safeguarding training and awareness;
- contribute to safe and respectful environments;
- record concerns appropriately;
- support individuals respectfully and proportionately; and
- work collaboratively with other agencies where appropriate.

Safeguarding is everyone's responsibility.

InterAct Safeguarding Contacts

InterAct Office		01245 801571
InterAct Designated Safeguarding Lead	Vickie Perkins	07976 781054
InterAct Deputy Safeguarding Lead	Mark Hagon	07957 997126

InterAct Youth Leaders also provide their phone numbers to the families of the young people they support.

In addition to our staff team, designated safeguarding Trustees are also involved with reviewing our policies and processes, as well as ensuring we are meeting our duty of care towards children and young people.

Other Safeguarding Contacts

Essex Adult Social Care 0345 603 7630.

Emergency Duty Service on 0345 606 1212.

Southend 01702 215008 (Out of hours: 0345 606 1212) <https://www.livewellsouthend.com/care-support-adults>.

Thurrock 01375 511000 or email Thurrock.First@thurrock.gov.uk.

Essex Police, 999 / 112

Types of Abuse, Neglect and Exploitation – Adults

General Guidance

Obvious signs of abuse, neglect and exploitation may be something that you have seen or heard, or an individual may disclose to you that they are at risk of abuse or are being abused, neglected or exploited.

Other signs may be less obvious and may not be noticed unless an individual has direct contact with the person being abused over a period of time.

One or more signs do not necessarily mean that an adult is being abused, as there could be other things happening in their life that are affecting their behaviour or explain what you can see outwardly. However, signs must be noted, and where there is a genuine concern, they must be reported.

It is therefore important that staff:

- Recognise common signs of abuse, neglect and exploitation; and
- Understand that adults can be at risk of harm inside and outside of their home, inside and outside of education, and online; and
- Be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

What is Abuse?

Abuse is a violation of a person's human or civil rights and may consist of:

- a single act;
- repeated acts;
- deliberate acts;
- neglect;
- exploitation; or
- failure to act appropriately.

Abuse may occur:

- face-to-face;
- online;
- within families;
- within organisations;
- in the community;
- in care settings; or
- through relationships of trust, dependency, or exploitation.

Physical Abuse

Physical abuse includes the use of force, violence, restraint, or inappropriate physical intervention that causes pain, injury, fear, distress, or harm. Examples may include:

- hitting;
- slapping;
- pushing;
- inappropriate restraint;
- misuse of medication;
- force-feeding;
- rough handling; or
- assault.

Emotional or Psychological Abuse

Emotional or psychological abuse includes behaviour that causes emotional harm, distress, fear, humiliation, intimidation, isolation, or loss of confidence. Examples may include:

- threats;
- humiliation;
- bullying;
- intimidation;
- coercive behaviour;
- controlling behaviour;
- gaslighting;
- verbal abuse;
- isolation;
- emotional manipulation; or
- preventing contact with others.

Sexual Abuse

Sexual abuse includes sexual activity or behaviour that an individual has not consented to or lacks the capacity to consent to. Examples may include:

- rape or sexual assault;
- inappropriate touching;
- sexual harassment;
- sexual exploitation;
- coercion into sexual activity;
- sexualised communication;

- exposure to sexual content;
- non-consensual image sharing; or
- online sexual exploitation.

Financial or Material Abuse

Financial abuse involves the misuse, theft, manipulation, or improper control of a person's money, property, benefits, possessions, or financial affairs. Examples may include:

- fraud;
- scams;
- theft;
- coercion relating to money;
- misuse of benefits;
- financial exploitation online;
- pressure relating to wills or property;
- misuse of power of attorney; or
- controlling access to money or possessions.

InterAct recognises that online and technology-enabled financial abuse is increasingly common.

Neglect and Acts of Omission

Neglect occurs when a person's physical, emotional, medical, personal care, educational, or support needs are ignored or not appropriately met.

Examples may include:

- withholding food, medication, or care;
- ignoring medical needs;
- failing to provide supervision or support;
- poor living conditions;
- inadequate access to healthcare; or
- organisational neglect arising from poor practice or systems.

Self-Neglect

Self-neglect refers to behaviour where a person fails to care appropriately for their own health, well-being, safety, hygiene, or living environment.

Examples may include:

- hoarding;
- poor personal hygiene;
- refusing support;
- neglecting medical needs;

- unsafe living conditions; or
- behaviour linked to trauma, addiction, neurodivergence, cognitive difficulties, or mental ill health.

InterAct recognises that self-neglect often requires supportive, trauma-informed, and multi-agency responses.

Domestic Abuse

Domestic abuse may include:

- physical abuse;
- emotional abuse;
- coercive or controlling behaviour;
- sexual abuse;
- financial abuse;
- psychological abuse; or
- technology-enabled abuse
- within intimate, family, or household relationships.

InterAct recognises that domestic abuse can affect:

- adults;
- young people;
- carers;
- families; and
- children living within abusive environments.

Discriminatory Abuse

Discriminatory abuse includes harassment, bullying, exclusion, hate incidents, or unequal treatment based on characteristics.

Organisational or Institutional Abuse

Organisational abuse refers to poor practice, neglect, unsafe cultures, or inappropriate systems within organisations, services, or care environments. Examples may include:

- unsafe practices;
- poor safeguarding culture;
- lack of dignity or respect;
- excessive control;
- poor leadership;
- unsafe staffing arrangements; or
- failure to respond appropriately to concerns.

Modern Slavery and Human Trafficking

Modern slavery may include:

- forced labour;
- domestic servitude;
- criminal exploitation;
- sexual exploitation;
- debt bondage; or
- human trafficking.

Individuals may be controlled through:

- threats;
- violence;
- coercion;
- dependency;
- grooming;
- exploitation of vulnerabilities; or
- confiscation of money or identification documents.

Criminal Exploitation

Criminal exploitation occurs when an individual is manipulated, groomed, coerced, or pressured into criminal activity. Examples may include:

- county lines activity;
- transporting drugs or weapons;
- theft;
- cuckooing;
- organised criminal activity; or
- financial crime.

Radicalisation and Extremism

Radicalisation refers to the process through which an individual may become supportive of extremist ideologies, harmful extremist groups, or acts of terrorism. InterAct recognises that radicalisation may occur:

- online;
- through peer groups;
- through grooming;
- through exploitation of vulnerabilities; or
- through social isolation or emotional distress.

Online Abuse and Digital Exploitation

InterAct recognises that abuse increasingly occurs online and through digital technology.

Online abuse may include:

- cyberbullying;
- sextortion;
- grooming;
- coercive online relationships;
- online scams;
- impersonation or fake accounts;
- image-based abuse;
- livestream exploitation;
- sharing intimate images without consent;
- online harassment;
- gaming-platform exploitation;
- phishing or social engineering;
- AI-generated abuse;
- deepfake imagery or audio;
- manipulation through online communities; or
- exploitation through messaging apps or social media.

InterAct recognises that online abuse may continue outside of face-to-face environments and may affect individuals at any time.

Mate Crime

Mate crime occurs when an individual is befriended, manipulated, exploited, abused, or harmed by someone who targets them because they are perceived as vulnerable.

This may involve:

- financial exploitation;
- coercion;
- manipulation;
- humiliation;
- criminal exploitation; or
- abuse disguised as friendship.

Honour-Based Abuse and Forced Marriage

Honour-based abuse includes abuse or harmful behaviour carried out to protect perceived family or community "honour".

This may include:

- forced marriage;
- coercion;
- threats;
- violence;
- control;
- isolation; or
- emotional abuse.

This list is not exhaustive – please see the [Essex Safeguarding Adults Board \(ESAB\)](#) page for more information.

Policy

InterAct's Safeguarding Principles

- The welfare of vulnerable adults is paramount in all the work we do
- All adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- Working in partnership with vulnerable adults, their families, carers and other agencies is essential in promoting their welfare
- Adults with special educational needs and disabilities are more likely to be victims of abuse, and additional safeguarding barriers may exist, such as:
 - Not recognising that their experiences may be harmful
 - Being more prone to peer group isolation than other people
 - Communication barriers
 - Assumptions that indicators of potential abuse relate to an individual's special needs or disability

The Six Principles of Safeguarding Adults

InterAct recognises that the Six Principles of Safeguarding should underpin all adult safeguarding work:

- 1. Empowerment:** Adults are encouraged to make their own decisions and are provided with support and information. This involves respecting their choices and preferences, ensuring they have the information they need to make informed decisions
- 2. Prevention:** Strategies are developed to prevent abuse and neglect, rather than just responding to situations after they arise, including identifying potential risks and implementing measures to reduce them
- 3. Proportionate:** A proportionate and least intrusive response is made, balanced with the level of risk. Interventions to be tailored to the specific situation, avoiding excessive or intrusive measures that could further harm the individual
- 4. Protection:** Providing support and representation for those who are most vulnerable and unable to protect themselves. This may involve working with the individual to identify their needs and concerns, and ensuring that they are able to access the services and support they need.
- 5. Partnerships:** Working collaboratively with individuals, their families, carers, and other professionals to ensure their needs are met; involving clear communication, shared decision-making, and shared goals
- 6. Accountable:** Holding individuals and organisations accountable for their actions and decisions in safeguarding. This includes ensuring that safeguarding procedures are followed, that concerns are addressed promptly and appropriately, and that lessons are learned from any incidents of harm.

Making Safeguarding Personal is a person-centred approach, which means that adults are encouraged to make their own decisions about how they live their lives and how they manage their safety and are provided with support and information to empower them to do so.

Safer Recruitment

InterAct is committed to safer recruitment and workforce safeguarding practices.

Safeguarding arrangements may include:

- appropriate application and recruitment processes;
- identity verification;
- references;
- DBS checks where appropriate;
- safeguarding-focused interviews;
- risk-based recruitment decisions;
- safeguarding induction;
- probationary oversight;
- supervision and training;
- ongoing suitability monitoring; and
- clear professional boundaries.

InterAct recognises that safeguarding responsibilities continue throughout employment and volunteering relationships.

Staff Training

The Charity recognises that effective safeguarding depends on staff, volunteers, trustees, and others working for us or on our behalf understanding their safeguarding responsibilities and having the knowledge and confidence to respond appropriately to concerns.

All staff and volunteers who work with, or may come into contact with, children and young people will receive safeguarding training appropriate to their role. This will normally include:

- recognising signs and indicators of abuse, neglect, exploitation, and harm;
- responding appropriately to disclosures;
- reporting safeguarding concerns;
- professional boundaries and safer working practices;
- online safety and emerging safeguarding risks;
- local safeguarding procedures and reporting arrangements; and
- the role of the Designated Safeguarding Lead (DSL) and Deputy DSL.

Safeguarding training will normally form part of induction and will be refreshed periodically to ensure knowledge remains current.

The DSL and Deputy DSL must complete safeguarding training appropriate to their responsibilities.

The Charity will refresh Level 3 DSL safeguarding training as required by the Essex Safeguarding Adults Board. Additional safeguarding updates, briefings, workshops, or continuous professional development activities may also be undertaken between formal training periods to ensure safeguarding knowledge remains up to date.

Records of safeguarding training completed by staff and volunteers will be maintained by the Charity.

Professional Curiosity

InterAct recognises the importance of professional curiosity in safeguarding practice.

Staff and volunteers should:

- remain professionally curious where concerns arise;
- consider whether explanations fully account for concerns or injuries;
- consider patterns of behaviour or repeated low-level concerns;
- respectfully challenge inconsistencies where appropriate;
- avoid accepting explanations uncritically;
- remain alert to disguised compliance; and
- seek advice where uncertainty exists.

Neurodivergence, Disability, Communication Needs and Increased Vulnerability

InterAct recognises that neurodivergent individuals, adults with learning disabilities, communication needs, cognitive differences, mental ill health, trauma histories, or additional support needs may experience increased vulnerability to:

- abuse;
- neglect;
- exploitation;
- coercion;
- bullying;
- discrimination;
- mate crime;
- financial abuse;
- online harm; or
- unsafe relationships.

InterAct also recognises that:

- communication differences may affect how concerns or disclosures are expressed;
- sensory needs, anxiety, trauma, or emotional distress may affect behaviour and presentation;
- some individuals may be more trusting, socially isolated, or vulnerable to manipulation, coercion, or exploitation;
- some adults may struggle to recognise unsafe relationships, abuse, exploitation, or online risks;
- behavioural changes or distress may indicate safeguarding concerns rather than solely disability-related needs;

- safeguarding concerns may sometimes be overlooked, minimised, or wrongly attributed to disability, diagnosis, behaviour, or mental ill health; and
- some individuals may require additional time, support, reassurance, or accessible communication in order to express concerns or participate in safeguarding processes.

InterAct will seek to:

- maintain accessible and inclusive communication;
- use trauma-informed and person-centred approaches;
- consider communication, sensory, emotional, and well-being needs;
- avoid discriminatory assumptions;
- support participation in safeguarding decisions wherever possible; and
- ensure safeguarding concerns are taken seriously and responded to appropriately.

Multi-Agency Working and Information Sharing

InterAct recognises that safeguarding is everyone's responsibility and that effective safeguarding depends upon:

- timely information sharing;
- professional challenge;
- collaborative working; and
- effective multi-agency safeguarding practice.

InterAct will work collaboratively with:

- Adult's Social Care;
- Essex Safeguarding Adults Board;
- Police;
- health professionals;
- commissioners;
- safeguarding professionals; and
- other relevant agencies.

Information sharing should be:

- lawful;
- necessary;
- proportionate;
- timely;
- relevant; and
- focused on protecting adults at risk.

Consent is not always required where:

- there are safeguarding concerns;

- there is risk of harm; or
- disclosure is otherwise legally justified.

Please see the "Do I Need Consent" section below for further information on where consent is needed and where it can be overridden.

Where professionals disagree regarding safeguarding action, InterAct supports respectful professional challenge and escalation.

Low-Level Concerns

InterAct recognises the importance of identifying and responding to low-level concerns at an early stage in order to:

- promote safe and professional practice;
- maintain appropriate boundaries;
- support safeguarding culture;
- reduce escalation of risk; and
- identify patterns of concerning behaviour.

A low-level concern is any concern, behaviour, action, or incident that:

- may not meet the threshold for formal safeguarding procedures or allegations management;
- is inconsistent with expected professional standards, boundaries, or conduct; or
- causes a sense of concern, unease, discomfort, or uncertainty.

Examples may include:

- inappropriate or over-familiar behaviour;
- poor professional boundaries;
- inappropriate online communication;
- concerning comments or jokes;
- favouritism;
- excessive private contact;
- minor breaches of policy;
- inappropriate social media activity; or
- behaviour that appears unusual, secretive, or inconsistent with InterAct's values.

Low-level concerns should still be:

- reported promptly;
- discussed appropriately;
- recorded where necessary; and
- reviewed proportionately.

Serious Incident Reporting

InterAct recognises that serious safeguarding incidents may require reporting to:

- the Charity Commission;
- Adult's Social Care;
- Police;
- safeguarding partnerships;
- commissioners;
- insurers; or
- other regulators or statutory agencies.

Trustees and senior management will consider whether safeguarding concerns meet the threshold for Charity Commission Serious Incident Reporting.

Procedures

Early Intervention and Prevention

InterAct recognises the importance of identifying concerns, vulnerabilities, well-being issues, or safeguarding risks at an early stage in order to:

- reduce escalation of risk;
- promote well-being and independence;
- support positive outcomes; and
- prevent abuse, neglect, exploitation, or crisis situations.

Therefore, where concerns are identified, InterAct may:

- provide advocacy to support young people in accessing services themselves;
- signpost individuals to relevant services;
- involve families, carers, or advocates where appropriate;
- work collaboratively with partner agencies; or
- make safeguarding or support referrals where necessary.

Responding to Low-Level Concerns

All low-level concerns must be reported to the Designated Safeguarding Lead (DSL) or Deputy DSL as soon as possible.

The individual reporting the concern should:

- explain what they observed or were told;
- provide factual information only;
- avoid speculation or assumptions; and
- provide dates, times, witnesses, or other relevant details where possible.

The DSL or Deputy DSL will:

- review the concern promptly;
- decide whether further information is needed;
- consider whether there are any patterns of behaviour or previous concerns;
- decide whether the concern remains a low-level concern or requires escalation;
- record the concern and any actions taken; and
- decide whether advice, supervision, monitoring, safeguarding action, disciplinary action, or further investigation is required.

Where necessary, the DSL or Deputy DSL may also seek advice from safeguarding professionals where it is not clear if the threshold has been met.

Making a Safeguarding Report to the Local Authority

- If you have an **immediate** safeguarding concern relating to an adult at risk, contact Essex Adult Social Care on 0345 603 7630.
- Out of hours, weekends, or bank holidays, contact the Emergency Duty Service on 0345 606 1212.
- Safeguarding concerns can also be reported online through the Essex County Council [safeguarding portal](#).
- For Southend, call 01702 215008 (Out of hours: 0345 606 1212) or report online at <https://www.livewellsouthend.com/care-support-adults>.
- For Thurrock, call 01375 511000 or email Thurrock.First@thurrock.gov.uk.
- If you are unsure whether a concern meets the safeguarding threshold or require advice and guidance, staff should seek advice from the DSL, Deputy DSL, manager, or Essex Adult Social Care.

If an adult is in immediate danger or a crime may have been committed, contact Essex Police immediately on 999 (or 101 for non-emergency concerns).

Guidance - Dealing with Disclosures

If an adult discloses abuse, neglect, exploitation, or harm, staff and volunteers should:

- remain calm, supportive, and non-judgmental;
- listen carefully and take the individual seriously;
- avoid asking leading or investigative questions;
- reassure the individual that they have done the right thing by speaking up;
- never promise confidentiality;
- explain that the information may need to be shared in order to keep people safe;
- consider the individual's communication, emotional, and support needs;
- record the concern accurately as soon as possible; and
- report the concern promptly in line with InterAct's safeguarding procedures.

In an emergency (if someone is in immediate danger), always contact the police by dialling 999.

Should I Get Consent?

Unlike children, adults have a general right to independence, including control over information about themselves.

In line with the Care Act 2014, staff should always seek the consent of the adult at risk before raising a safeguarding alert to the Local Authority or Police, as to respect the adult's right to decide how, or if, they want an investigation to proceed.

However, staff must understand the specific circumstances where consent is not required or where it must be overridden to ensure safety.

Staff have a duty to report a safeguarding concern without the service user's consent in the following situations:

- Lack of Capacity: The individual is known to lack the mental capacity to understand the risk or the decision to report.*
- Public Interest / Risk to Others: The abuse involves a risk to other people (e.g., other tenants, children, or the public).
- Coercion and Duress: Staff have reasonable grounds to believe the person is being pressured, threatened, or coerced into refusing consent. In these cases, "consent" is not valid because it is not given freely.
- Serious Crime: A serious crime has been committed (staff should contact the Police immediately).

*All staff must apply the following **five principles of the MCA** in their daily work:

1. Presumption of Capacity: A person must be assumed to have capacity unless it is established that they lack it.
2. Support to Make Decisions: A person is not to be treated as unable to make a decision unless all practicable steps to help them to do so have been taken without success. (e.g., using easy-read documents, pictures, or preferred communication methods).
3. Unwise Decisions: A person is not to be treated as unable to make a decision merely because they make an unwise decision. Staff must respect a person's right to make choices that staff may disagree with, provided they have the capacity to understand the risk.
4. Best Interests: An act done, or a decision made, under this Act for or on behalf of a person who lacks capacity must be done in their best interests.
5. Least Restrictive Option: Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action.

Should I tell the parents/guardians?

InterAct recognises that working openly and collaboratively with families is usually important and beneficial. However, there are situations where informing parents or carers may:

- place a child or young person at further risk;
- compromise a safeguarding investigation;
- lead to intimidation, coercion, or evidence being concealed; or
- create additional safeguarding concerns.

The following are circumstances where disclosure to the parent or guardian is **not** appropriate:

- Where sexual abuse or sexual exploitation is suspected.
- Where organised or multiple cases of abuse are suspected.
- Where Fabricated or Induced Illness is suspected.
- Where Female Genital Mutilation is the concern.
- In cases of suspected Forced Marriage.
- Where it would place a child or young person, yourself, or others at immediate risk.

Managing Allegations Against Our Staff

All allegations of abuse by staff, both present and historical, must and will be taken seriously.

Any and all reports received must immediately be reported to the Service Manager, DSL or Deputy DSL.

InterAct recognises that concerns may arise both:

- within InterAct activities or services; and
- outside of work or volunteering,

where behaviour may indicate that an individual poses a risk to adults at risk, children, young people, colleagues, or others.

InterAct will respond proportionately and may:

- seek safeguarding advice;
- make referrals to Adult Social Care, Police, or other agencies;
- initiate safeguarding procedures;
- carry out internal investigation processes;
- implement disciplinary procedures; or
- take immediate action to reduce risk where necessary.

In the short term, consideration may be given to suspending or amending the duties of the accused. All staff who are subject to such action will be offered appropriate support until the investigation is concluded. The staff member's rights, including fair treatment and confidentiality, will be upheld throughout the process.

Once the investigation is complete, the findings will be documented and provided to the appropriate authorities, including the Local Adult Safeguarding Board, Police, etc.

If the allegation is sustained, appropriate action will be taken in line with internal policies and legal requirements (including referral to the Disclosure and Barring Service (DBS) where appropriate).

If the allegation is unfounded, the staff member's rights, reputation, and well-being will be appropriately considered.

Record Keeping

All safeguarding concerns, disclosures, allegations, incidents, accidents, injuries, behavioural concerns, low-level concerns, body map recordings, and actions taken must be recorded appropriately using InterAct's safeguarding documentation, including:

- Incident Forms;
- Body Maps; and
- any associated safeguarding records or reporting systems used by InterAct.

Records should:

- be completed as soon as possible after the concern, incident, disclosure, or observation;
- contain factual, accurate, and objective information only;

- clearly distinguish between fact, observation, and opinion;
- include dates, times, locations, and names of individuals involved where known;
- record the exact words used by the child or young person where relevant;
- include details of injuries, behaviours, disclosures, or concerns observed;
- record actions taken and referrals made;
- record who the concern was reported to and when; and
- be signed, dated, and stored securely.

Safeguarding records will normally be:

- treated as confidential;
- stored securely on the Teams Drive;
- accessed only by authorised individuals on a need-to-know basis; and
- managed in accordance with safeguarding, confidentiality, and data protection requirements.

The Designated Safeguarding Lead (DSL) and Deputy DSL are responsible for ensuring:

- safeguarding records are appropriately maintained;
- records are reviewed where necessary;
- referrals and actions are documented appropriately; and
- safeguarding information is retained and shared lawfully and proportionately.

Where safeguarding concerns are escalated to external agencies, copies of relevant records may be shared where necessary to protect children and young people from harm.

Confidentiality and Data Protection

InterAct will ensure that staff will read our Data Protection and GDPR Policy and abide by it, whilst understanding that these laws are not barriers to sharing information in many cases.

Non-Compliance

Failure to comply with this policy may:

- place children or young people at risk of harm;
- undermine safeguarding arrangements;
- expose InterAct to legal, safeguarding, reputational, or regulatory risk; and
- result in disciplinary or other appropriate action.

Concerns relating to safeguarding practice, unsafe behaviour, or failure to follow safeguarding procedures must be escalated promptly through appropriate safeguarding or whistleblowing arrangements.

Monitoring and Review

InterAct will monitor safeguarding arrangements through:

- safeguarding oversight;
- incident reviews;
- supervision;
- governance oversight;
- safeguarding audits;
- complaints and feedback;
- safeguarding reporting;
- risk management processes; and
- policy review arrangements.

This policy will be reviewed at least annually, or sooner, where:

- legislation or safeguarding guidance changes;
- safeguarding reviews identify improvements;
- significant incidents occur;
- organisational arrangements change; or
- emerging safeguarding risks are identified.

This policy will be made available in other formats upon request, and InterAct stakeholders are encouraged to speak to any member of staff if they have any questions or require clarification.

Appendix A: Safeguarding Code of Conduct

You must:

- treat all children and young people with respect
- provide an example of good conduct you wish others to follow
- ensure that, whenever possible, there is more than one adult and/or peer volunteer present during activities with children and young people, or at least that you are within sight or hearing of others
- respect a young person's right to personal privacy
- encourage young people and adults to feel comfortable and caring enough to point out attitudes or behaviour they do not like
- remember that someone else might misinterpret your actions, no matter how well-intentioned
- be aware that any physical contact with a child or young person may be misinterpreted – so only make physical contact where necessary and preferably with consent
- recognise that caution is required when you are discussing sensitive issues with children or young people
- operate within InterAct's Safeguarding Children and Young People Policy and linked policies
- challenge unacceptable behaviour and report all allegations/suspicions of abuse
- maintain appropriate dress and personal appearance when working
- give guidance and support to less experienced staff and volunteers

You must not:

- have inappropriate physical, verbal, phone, text or online contact with children or young people
- allow yourself to be drawn into inappropriate attention-seeking behaviour
- make suggestive, inappropriate or derogatory remarks or gestures in front of children or young people, or their parents/carers
- jump to conclusions about others without checking facts
- show favouritism to any individual
- either exaggerate or trivialise child abuse issues
- rely on your good name or that of InterAct to protect you
- believe "it could never happen to me"
- take a chance when common sense, policy or practice suggests another more prudent approach
- disclose your home address or personal phone numbers
- share inappropriate information about personal lives
- arrange to meet children, young people, their parents or vulnerable adults socially

If any of the following occur, you should report this immediately to a manager and record the incident:

- If you accidentally hurt a child or young person
- If a child or young person seems distressed in any manner
- If a child or young person appears to be sexually aroused by your actions
- If a child or young person misunderstands or misinterprets something you have done

Where appropriate, you (or a colleague) should also ensure the parents/carers of the young person are informed.

Appendix B: Additional Information for Parents and Carers

If, following an arrangement made through InterAct, your child has an injury you think may not be accidental, or you are not happy with the explanation given, or should you suspect your child has been harmed or abused in some way:

Make a written note of why you are concerned, what your child said about the incident, and about any subsequent conversations with InterAct staff or volunteers on the matter. If you are unhappy or not satisfied with the explanations or information given to you, you should note the reasons why and either:

- Contact the InterAct (01245 392053) and speak to our Designated Safeguarding Lead or Deputy Safeguarding Lead; or
- Contact the Essex Adult Social Care Team (0345 603 7630)

If you contact Social Care, they will decide whether to carry out an investigation under their Safeguarding Procedures. The form of this investigation will depend upon the nature of the injury or concern. It is likely that it will include the appointment of a key worker by Social Care, who will have overall responsibility for coordinating the investigation.

If you contact InterAct, the Designated Safeguarding Lead or their Deputy will likely contact Adult's Social Care, who will then decide what further action is required.

Please Note:

- InterAct welcomes feedback and comments from those who access our services and their parents/carers, and we aim to ensure that any concerns or difficulties raised are resolved effectively.
- Informal feedback and suggestions are welcome at all times - please speak or write to your usual contact at InterAct, or use one of the project feedback mechanisms.
- If you have any concerns or comments about our services, which InterAct needs to address more formally, you should contact InterAct to discuss your concerns.
- If there are concerns or difficulties which cannot be resolved to your satisfaction, the Comments, Compliments & Complaints Policy will be followed. Copies are available from the charity office.

Appendix C: Specific Guidance Relating to Residential Trips

InterAct appreciates the value of residentials, particularly those at outdoor activity centres, in supporting the personal and social development of young people.

Staff should always consider the additional risks to young people during these activities, including their individual support needs and potential vulnerability, particularly overnight, and take appropriate actions to minimise such risks.

Before the activity:

- Full consent forms should be circulated to families and returned in sufficient time for individual needs and risks to be documented and considered.
- Site visits must be undertaken prior to the visit if the site has not been used by InterAct or if key staff are unfamiliar with the site.
- Information and risk assessments should be requested from the Centre, so any specific risks to participants can be considered in advance.
- Staffing levels should be agreed: paid staff, volunteers and individual personal assistants (PA) support for participants (including overnight arrangements). Consideration should be given to rest periods and the needs of the staff/volunteers/Pas.
- Briefing session/information for participants and parents/carers to be held where appropriate, to enable any individual concerns to be raised and addressed.
- DBS disclosures for any PAs should be seen by staff, where these have not been carried out by InterAct.
- Risk assessments should be completed, covering group arrangements and individual needs/risks, medication requirements and storage, and any contingency plans, including reserve/replacement staff. This is to be agreed by all staff involved and signed off by a senior manager.

During the activity:

- Qualified instructors will be responsible for ensuring safety during planned activities, following their own procedures, but InterAct staff and volunteers have a key role in supporting them, to ensure safe and appropriate behaviour by participants, and responding to any individual needs which may arise.
- InterAct staff and volunteers should work with Centre staff to ensure young people are ready, able and supported to participate in the programme as planned. InterAct staff and volunteers will also be responsible for support and supervision of young people during 'free time', including overnight.
- Individuals should have privacy for changing, washing, etc., although it is acknowledged that individual PAs or staff may need to give appropriate support for this or other personal care needs to the young person in their care.

Overnight arrangements:

- Accommodation will usually be provided for each sex with individual requirements, including those relating to gender differences, considered positively and respectfully.
- Attention needs to be given to safe access for the children/young people to adult leaders and to toilet facilities during the night.
- Adults should sleep in separate, adjacent sleeping quarters, unless where individuals are identified as being vulnerable overnight, for their own health and well-being, or because of the potential risk they may pose to others if unsupervised, it may be appropriate for a member of staff, a volunteer or PA to sleep in the same room. These arrangements should be discussed and agreed in advance with the parents/carers involved, and noted in the risk assessment. If such arrangements are needed due to unforeseen circumstances, parents/carers should be contacted and verbal consent obtained.

Accidents and Incidents during residential activities

- Any incidents occurring should be reported immediately to the InterAct Lead Youth Worker and to the Centre. A written Accident and Incident report should be completed as soon as possible.
- If the incident is serious or impacts the safe continuation of the activity, the InterAct Lead Youth Worker should contact a Senior Manager for advice. This may include asking the individual to leave the activity. Arrangements should then be made to ensure that the individual can return home safely.

References

- [Essex Safeguarding Adults Board \(ESAB\)](#)
Adult safeguarding procedures, guidance, and multi-agency safeguarding resources for Essex.
- SET Safeguarding Adult Procedures
Southend, Essex and Thurrock multi-agency safeguarding adult procedures.
- [Care and Support Statutory Guidance](#)
Statutory guidance supporting implementation of the Care Act 2014.
- [Charity Commission Safeguarding and Protecting People for Charities and Trustees](#)
Charity Commission safeguarding responsibilities and governance expectations.
- [Charity Commission Serious Incident Reporting Guidance](#)
Guidance on reporting serious safeguarding and governance incidents to the Charity Commission.
- [Information Sharing Advice for Safeguarding Practitioners](#)
Government guidance on lawful and proportionate safeguarding information sharing.
- [UK Council for Internet Safety \(UKCIS\) Guidance](#)
Online safety guidance and emerging digital safeguarding risks.
- [Prevent Duty Guidance](#)
Guidance relating to preventing radicalisation and extremism.
- [Disclosure and Barring Service \(DBS\) Guidance](#)
DBS eligibility, safer recruitment, and barring guidance.
- [Mental Capacity Act 2005 Code of Practice](#)
Guidance relating to decision-making, capacity, consent, and best interests.
- [Care Act 2014 Legislation](#)
- [Mental Capacity Act 2005 Legislation](#)
- [Safeguarding Vulnerable Groups Act 2006 Legislation](#)
- [Counter-Terrorism and Security Act 2015 Legislation](#)
- [Domestic Abuse Act 2021 Legislation](#)
- [Modern Slavery Act 2015 Legislation](#)
- [Data Protection Act 2018 Legislation](#)
- [Equality Act 2010 Legislation](#)
- [Human Rights Act 1998 Legislation](#)

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