**Turtle Dove Cambridge Community Interest Company**

**Safeguarding for Child or Young Person and Adults at Risk Policy and Procedures**

**Updated: November 2023**

**Review due: November 2024**

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Details of the organisation

**Name of Organisation:** Turtle Dove Cambridge Community Interest Company

**Registered Address:** Church of the Good Shepherd, Mansel Way, Cambridge, CB4 2ET

Registered SAIL office address: N/A

**Tel No:** 07902851151 **Email address:** [hello@turtledovecambridge.com](mailto:hello@turtledovecambridge.com)

**Membership of Organisation:**

ThirtyOne:Eight (Formerly CCPAS) membership number: 9426

Social Enterprise UK membership number: 9056

SEEE membership

CMHN (formerly WAVET) membership

GET Group membership

CCVS membership

NVCO membership

Trust Law membership

Women of Impact

**Charity Number:** N/A **Company Number:** 08542595

**Regulators details (Board of Directors registered with Companies House):**

**Kate Nation:** Church Of The Good Shepherd, Mansel Way, Cambridge, England, CB4 2ET

**Edwina Mullins:** Church Of The Good Shepherd, Mansel Way, Cambridge, England, CB4 2ET

**Laura Atkin:** Church Of The Good Shepherd, Mansel Way, Cambridge, England, CB4 2ET

**Collette O’Connor:** Church Of The Good Shepherd, Mansel Way, Cambridge, England, CB4 2ET

Turtle Dove Cambridge works with specialist Clinical Supervisors and Safeguarding Consultants. Please contact the Managing Director, Kate Nation, for contact details.

**Additional Advisors:**

Ali Rice

Monika Jerszynska

Gaelle Seal-Coon

Malcolm Williamson

Becs Herd

**Insurance Company:** Zurich **Telephone:** 01793 511 227

**The following is a brief description of Turtle Dove Cambridge and the type of work / activities we undertake with children or young people / adults at risk:**

Turtle Dove Cambridge works in partnership with various local organisations in Cambridge to offer work experience for young women across the City. Turtle Dove Cambridge takes referrals from other youth support organisations such as housing providers, schools and namely the Cambridgeshire County Council, hereafter referred to as CCC. These young women have been identified as being in need of extra support for various reasons such as educational, emotional and behavioural issues and primarily are or are at risk of being or becoming NEET (Not in Education, Employment or Training).

Turtle Dove Cambridge works at a variety of local events and occasionally puts on events in community settings, predominantly with older people in the community. The young women involved become part of the team where we are involved in tasks such as serving food and drink, meeting and greeting guests and set up and clear down. The aim is for the young women to increase in confidence, further recognise their skill sets, expand their network and input in the community and consequently move further towards education, employment, training or voluntary work.

All money we hope to generate from the events will go back into the company and its work. We are registered as a Community Interest Company. Turtle Dove Cambridge has been a part of 50th Generation, Cambridge Social Ventures (formerly The Social Incubator East) and the School of Social Entrepreneurs Start-Up Lloyds Programme, all incubators for businesses that aim to have a social impact. We have received advice, finance and guidance from them. Turtle Dove Cambridge seeks to work closely with the local County Council and they will be able to see and approve our child or young person protection and adult safeguarding policies.

Our commitment

As a Leadership we recognise the need to provide a safe and caring environment for child or young people and adults at risk. We acknowledge that child or young person and adults at risk can be the victims of physical, sexual and emotional abuse, radicalisation and neglect. We accept the UN Universal Declaration of Human Rights and the International Covenant of Human Rights, which states that everyone is entitled to “all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”. We also concur with the Convention on the Rights of the Child or young person which states that child or young person should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from “all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child or young person.” As a Leadership we have therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance. We are committed to building constructive links with statutory and voluntary agencies involved in safeguarding.

The policy and attached practice guidelines are based on the ten **Safe and Secure** safeguarding standards published by ThirtyOne:Eight (formerly the Churches' Child or young person Protection Advisory Service, CCPAS).

The Leadership undertakes to:

* Endorse and follow all national and local safeguarding legislation and procedures, in addition to the international conventions outlined above.
* Provide a minimum of annual safeguarding training for all it workers **(minimum Level 2 for volunteers and Level 3 for delivery staff)** and will regularly review the operational guidelines attached.
* Ensure that the premises meet the requirements of the Disability Discrimination Act 1995 and all other relevant legislation, and that it is welcoming and inclusive.
* Support the Safeguarding Coordinator(s) in their work and in any action, they may need to take in order to protect child or young person and adults at risk.
* Have a copy accessible at Turtle Dove Cambridge’s registered office address. The Leadership agrees not to allow the document to be copied by other organisations.
* Turtle Dove Cambridge will also follow practice laid out in Section 42 – 46 of the Care Act 2014. This will be achieved by following the guidance and procedures found at:

Cambridgeshire County Councils and Cambridgeshire LSCB Safeguarding Policy and Procedures:

<https://www.cambridgeshire.gov.uk/residents/working-together-children-families-and-adults/how-we-work/adult-safeguarding-and-mental-capacity/adult-safeguarding/> - Last accessed on 17/10/2022

Cambridgeshire County Councils Policy guidance for voluntary and community organisations:

<https://www.cambridgeshire.gov.uk/residents/adults/keeping-safe/adult-safeguarding-and-mental-capacity/adult-safeguarding/> Last accessed on 17/10/2022

Turtle Dove Cambridge will work to the governments Prevent element of the Government’s Counter Terrorism Strategy, and where deemed appropriate seeks external support for learners through referrals to the Channel Programme strategy.

Safeguarding awareness

The Leadership is committed to on-going safeguarding and development opportunities for all workers, developing a culture of awareness of safeguarding issues to help protect everyone.**All our workers will receive induction training and undertake recognised safeguarding training (minimum Level 2 for volunteers and Level 3 for delivery staff) on a regular basis through either** Cambridgeshire Local Safeguarding Child or Young Person Board, Voluntary Community Action for East Cambridge, Cambridgeshire Council for Voluntary Service, ThirtyOne:Eight (Formerly CCPAS) or another recognised local provider for child or young person and young people such as Centre 33.

**We will provide additional training to workers who have not received safeguarding training prior to their involvement with Turtle Dove Cambridge. For example, through NHS online Safeguarding training and talking through the policies and procedures with example situations. All workers will be provided with the Home Office’s document on ‘Abuse of Trust’ guidance.**

The Leadership will also ensure that child or young person and adults at risk are provided with information on where to get help and advice in relation to abuse, discrimination, bullying or any other matter where they have a concern.

Objectives

**We aim to ensure that all workers;**

* Understand our Safeguarding Policy and procedures and how they impact on their day-to-day operations.
* Understand their responsibilities, what they need to do, and what they can expect of one another, to safeguard and protect the welfare of children, young people, and vulnerable adults.
* Understand when and how to report allegations of neglect, abuse, or the risk of harm to children, young people, and vulnerable adults.

Implementation

The Safeguarding policy covers the distinct areas of activity of the service.

**We will apply this policy by;**

* Ensuring that all workers are all aware of the Safeguarding Policy and have completed appropriate training and support, in order to be able to recognise harm and know how to report any concerns in a timely and appropriate way.
* Ensuring that all workers are aware of the relevant Local Authorities Safeguarding Children and Vulnerable Adults Policies and procedures.
* Monitoring allegations of neglect, abuse or harm to children and young people made against any employee in order to understand how and why these happened and to ensure that appropriate systems and processes are in place to prevent any repeat occurrences.

**We will seek to safeguard people by;**

* Ensuring every client accessing our services has an experience of being valued, listened to and their safety and well-being being prioritised.
* Ensuring that we provide a safe and comfortable physical environment for young people and adults.
* Sharing information about safeguarding with children, young people, and adults via online leaflets and one to one discussion.
* Appointing a nominated person with responsibility for safeguarding.
* Conduct safer recruitment.
* Adopting child protection and safeguarding best practice through our policies, procedures, and code of conduct for all workers.
* Ensuring that we have effective complaints and whistleblowing procedures in place.
* Using our safeguarding procedures to share concerns and relevant information with agencies.
* Providing effective governance frameworks for all workers, through supervision, support, training, and quality assurance measures so that all staff and volunteers know about and follow our policies and procedures.
* Recording, storing and using information professionally and securely, in line with data protection legislation and guidance.
* Using our procedures to manage any allegations against staff and volunteers appropriately.
* Establish and nurture a culture where workers share an understanding of our commitments and responsibilities for safeguarding.

Legislation

We seek to ensure that all services provided by Turtle Dove Cambridge fully meet the requirements of all current Safeguarding legislation, regulations, and National Minimum Standards.  
It is important that all workers fully understand their responsibilities and duties as set out in primary legislation and the associated regulations and guidance.

**Legal frameworks and guidance informing Turtle Dove Cambridge policies, procedures, and practice;**

* United Convention of the Rights of the Child 1991
* Human Rights Act 1998
* Data Protection Act 1998
* Care Standards Act 2000
* Sexual Offences Act 2003
* Protection of Vulnerable Adults Scheme (POVA) 2004
* Children Act 1989 (Revised 2004)
* Mental Capacity Act 2005
* Safeguarding Vulnerable Groups Act 2006
* Social Care Act 2008
* Protection of Freedoms Act 2012
* Care Act 2014
* Special Education needs and disabilities (SEND) Code of Practice: 0-25 years. Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities. HM Government 2014
* Working Together to Safeguard Children 2015
* The Adoption National Minimum Standards
* Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers. HM Government 2015

Risks

**Particularly Vulnerable Children**

It is widely recognised that there are some groups of children and young people who may be particularly vulnerable to neglect, abuse or exploitation because of specific concerns in relation to their safeguarding and because of some specific issues in relation to promoting their welfare.

These groups include but are not limited to:

• Children who are living away from home   
• Children who are being bullied   
• Children whose behaviour indicates a lack of parental control   
• Children who are experiencing racism   
• Children who are experiencing violent extremism   
• Children who are experiencing parental domestic violence   
• Children with families whose whereabouts are unknown   
• Children who go missing from home or care   
• Children who go missing from education   
• Children of families living in temporary accommodation   
• Migrant children   
• Unaccompanied asylum-seeking children (UASC)

Definitions of abuse

There are many ways in which children can be harmed but the four common classifications employed with regards to child abuse are:

* Neglect
* Physical abuse
* Emotional abuse
* Sexual abuse (including Child Sexual Exploitation)

In must be recognised that Safeguarding is not just about protecting children from deliberate harm; it can also include issues such as:

* Health and Safety
* Bullying
* Racist abuse
* Discrimination
* Harassment
* Drug and other substance abuse
* Internet safety
* Gang activity
* Female genital mutilation
* Forced marriages
* Radicalisation
* Child Sexual Exploitation and criminal exploitation behaviours

**Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse and/or failure to engage with pre-natal care.

Once a child is born, neglect may involve a parent or carer failing to:

* Provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
* Protect a child from physical and emotional harm or danger
* Ensure adequate supervision (including the use of inadequate caregivers) or
* Ensure access to appropriate medical care or treatment

The category of neglect may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Physical abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child so that it causes severe and persistent adverse effects on a child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing the child or 'making fun' of what they say or how they communicate.

Emotional abuse may also feature expectations being imposed on a child that are not in-keeping with the child’s age or stage of development. This may include:

* Expectation that the child performs at a level that is beyond the child's developmental capability or
* Overprotection to an extent that severely restricts the child’s opportunities to learn through exploration and/or prevents the child participating in normal social interactions.

Emotional abuse may also involve:

* The child being exposed to (seeing or hearing) the ill-treatment of another
* The child being subject to serious bullying (including cyber-bullying), causing the child to frequently feel frightened or in danger
* The exploitation or corruption of the child

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities (not necessarily involving a high level of violence) whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of a child’s clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse, including via the internet or social media. Sexual abuse is not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children.

Sexual exploitation of children and young people under 18 can involve gangs or individuals luring them into performing sexual activities in exchange for gifts like money, food, drugs or alcohol. It can also happen through grooming using technology – for example, young people being persuaded to post sexual images on the internet or mobile phones.

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

**Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**

Child Criminal Exploitation (CCE) and Child Sexual Exploitations (CSE) are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants

and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

**‘Honour Based’ Abuse**

Honour Based Abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing. It can include multiple perpetrators.

**FGM** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the multi-agency statutory guidance on FGM. If staff have a concern that a student may be at risk of HBA or has suffered HBA, they should speak to the DSL. As appropriate they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children’s Social Care.

**Preventing Radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools’ safeguarding approach.

• Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

• Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

• Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

**Online safety**

Children should be provided with a safe environment to learn and work, including when online. Filtering and monitoring are both important parts of safeguarding children and staff from potentially harmful and inappropriate online material.

The young people accessing our Alternative Education Programme access learning online via a login to CPL Learning ([Hospitality Learning & Retail Training Provider | CPL Learning](https://cpllearning.com/)). They are monitored at all times when accessing this provision by the Alternative Education Lead.

The risks and identified above are not an exhaustive account of all risks to children, young people, adults, and vulnerable adults. Themes such as other honour-based abuse, modern slavery and radicalisation, all need to be considered.

All workers have a responsibility to be continuously vigilant to noticing potential signs of possible abuse. It is our duty of care to be observant and responsive to concerns, discussing these with the appropriate person within Turtle Dove Cambridge namely;  
  
**Kate Nation  
Managing Director  
  
Designated Safeguarding Officer: Kate Nation   
Email: kate@turtledovecambridge.com   
Telephone: 07902851151**

Protection and Action to be Taken

**Key Principles**

Effective safeguarding arrangements are underpinned by two key principles:

* Safeguarding is everyone’s responsibility: for services to be effective each professional and organisation should play their full part and
* A child-centred approach: for services to be effective they should be based on a clear understanding of the needs and views of children

Therefore, everyone who works with children, including teachers, GPs, nurses, midwives, health visitors, early year’s professionals, youth workers, Police, Accident and Emergency staff, paediatricians, voluntary and community workers, foster carers and social workers all have a responsibility for keeping all children safe.

Turtle Dove Cambridge promotes an open and transparent policy in safeguarding the needs of children, young people, and vulnerable adults, and believe that no single professional/person can have a full picture of a person’s needs and circumstances. If children, young people, and vulnerable adults are to receive the right help at the right time, everyone who comes into contact with them must play a role in identifying concerns and must take prompt action to share any concerns or relevant information with the relevant parties.

Turtle Dove Cambridge has a duty to safeguard and promote the well-being of children, young people, and adults it provides services to, to achieve this objective we will:

* Prevent unsuitable people working with children, young people, and vulnerable adults
* Promote safe practices and challenge poor and unsafe practice
* Identify concerns about a child’s or vulnerable adults’ welfare and take appropriate action
* Contribute to effective partnership working
* Monitor and review this in line with continuous development and improvement of the service
* Recognising child and adult abuse is not easy, and it is not for workers to take on the responsibility for deciding whether or not abuse has taken place or if a child, young person, or adult is at significant risk; however, everyone has a responsibility to act and report concerns to appropriate parties.

For Local authorities’ Safeguarding Policies, please contact the individual local authority’s Safeguarding Service or Local Authority Designated Officer for Child Abuse [LADO].

Responding to concerns

A crucial aspect of Safeguarding is the need to ensure that all children, young people, and vulnerable adults have the mechanism for talking about concerns with people who they trust and who are both able to listen and prepared to act on their concerns.   
Where there is a concern that the child, young person, or vulnerable adult may be being adversely affected by what is happening (or may previously have happened) to them, the involved professional(s) or carer(s) should:

* Collect as much information as possible about the situation - this may be from the child, young person, adult or parent, carer or other professionals and should include the date and time of the incident or disclosure, the parties that were involved, what was said or done and by whom, and any further actions – [What to do if a child reveals abuse | NSPCC](https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/what-to-do-child-reveals-abuse/)
* Report their concerns to Turtle Dove Cambridge Designated Safeguarding Officer immediately and at the latest within the same working day
* Contact the relevant Local Authority
* Record all actions taken
* Under no circumstances should a worker carry out their own investigation into an allegation or suspicion of abuse.

Many of the concerns about children and young people that arise on a day-to-day basis can be dealt with quickly and easily through discussion between the involved professional(s) and the child’s parent(s) or carer(s) where further advice or help may, if necessary, be offered. However, where there is reasonable cause to believe that a child has suffered, or is likely to suffer Signiﬁcant Harm, a referral must be made, in accordance with the [Referrals](http://proceduresonline.com/berks/reading/p_referrals.html) [Procedure](http://proceduresonline.com/berks/reading/p_referrals.html) to Children's Social Care. The Local Authority for the area in which the child is living then has the responsibility to convene a Strategy Discussion/Meeting, which should include representatives from the responsible Local Authority that placed the child, if different.

At the Strategy Discussion/Meeting it should be decided which Local Authority should take responsibility for the next steps, which may include an Assessment and a Section 47 Enquiry.

Whether a child is placed in the care of prospective adopters or in foster care, privately fostered, in a residential setting, hospital, custody or living in temporary accommodation with their family, the duty to protect is essentially the same. The local authority has a duty to undertake an Assessment which may lead to a Section 47 Enquiry where there are concerns about signiﬁcant harm.

The person in receipt of allegations or suspicions of abuse should report concerns as soon as possible to **Kate Nation** (hereafter the "Safeguarding Co-ordinator") who is nominated by the Leadership to act on their behalf in dealing with the allegation or suspicion of neglect or abuse, including referring the matter on to the statutory authorities.

* In the absence of the Safeguarding Co-ordinator or, if the suspicions in any way involve the Safeguarding Co-ordinator, then the report should be made to the **Directors** (hereafter the "Deputy") email: [directors@turtledovecambridge.com](mailto:directors@turtledovecambridge.com). If the suspicions implicate both the Safeguarding Co-ordinator and the Deputy, then the report should be made in the first instance to the ThirtyOne:Eight (Formerly the Churches’ Child or young person Protection Advisory Service, CCPAS) PO Box 133, Swanley, Kent, BR8 7UQ. Telephone **03030031111 option 2**. Alternatively contact Social Care or the Police.
* Where the concern is about a child or young person the Safeguarding Co-ordinator should contact Children’s Social Care. Where the concern is regarding an adult in need of protection contact Adult Social Care or take advice from ThirtyOne:Eight (Formerly CCPAS) as above.
* The local Children’s Social Care office telephone number (office hours) is: **08450455203**. The out of hours emergency number is **01733 234724**.
* The local Adult Social Care office telephone number (office hours) is **03450455202**. The out of hours emergency number is **01733 234724**.
* The Police Child or young person Protection Team telephone number is **0845 4564564**.
* Where required the Safeguarding Co-ordinator should then immediately inform the insurance company. Zurich (Insurance Company) Tel no: **01793 511 227**.
* Suspicions must not be discussed with anyone other than those nominated above. A written record of the concerns should be made in accordance with these procedures and kept in a secure place.
* Whilst allegations or suspicions of abuse will normally be reported to the Safeguarding Co-ordinator, the absence of the Safeguarding Co-ordinator or Deputy should not delay referral to Social Care, the Police or taking advice from ThirtyOne:Eight (Formerly CCPAS). Or in cases of radicalisation to the Channel Scheme as appropriate.
* The Leadership will support the Safeguarding Co-ordinator/Deputy in their role and accept that any information they may have in their possession will be shared in a strictly limited way on a need-to-know basis.
* It is, of course, the right of any individual as a citizen to make a direct referral to the safeguarding agencies or seek advice from ThirtyOne:Eight (Formerly CCPAS), although the Leadership hope that members of the organisation will use this procedure. If, however, the individual with the concern feels that the Safeguarding Co-ordinator/Deputy has not responded appropriately, or where they have a disagreement with the Safeguarding Co-ordinator(s) as to the appropriateness of a referral they are free to contact an outside agency direct. We hope by making this

statement that the Leadership demonstrate its commitment to effective safeguarding and the protection of all those who are vulnerable.

The role of the Safeguarding Co-ordinator/Deputy is to collate and clarify the precise details of the allegation or suspicion and pass this information on to statutory agencies who have a legal duty to investigate.

Historical Abuse

The term historical abuse refers to any allegations of child abuse, which occurred when the victim was a child, and which have been made when the victim is an adult.

This policy will outline the options for responding to disclosure, helping workers to be as effective as possible in supporting vulnerable adults, as well as in ensuring they meet their duty to safeguard children, young people or adults who may be at risk now.

Allegations of child abuse are sometimes made by adults and children many years after the abuse has occurred. There is no time limit as to when a complaint can be made. There are many reasons why an allegation was not made at the time it occurred, such as fear of reprisals, the degree of control exercised by the abuser, shame or fear that the allegation may not be believed.

A client’s disclosures should be taken seriously, regardless of their presenting problems or mental health diagnosis.

Turtle Dove Cambridge’s response to allegations/disclosures of abuse experienced as a child must be dealt with on the same merit as a current complaint of abuse because:

There is a significant likelihood that a person who abused a child/ren in the past will have continued and may still be doing so.

Criminal prosecutions can still take place even though the allegations are historical in nature and may have taken place many years ago.

Historical abuse cases may be complex as the alleged victim may no longer be living in the situation where the incident(s) occurred, or the alleged perpetrator may no longer be linked to the setting or employment role. Such cases should be responded to in the same way as any other concerns. In all cases it is important to ascertain as a matter of urgency if the alleged perpetrator is still working with or caring for children.

**Procedure**

Should a client disclose historical abuse, the worker should sensitively ascertain if the abuse was previously reported. In the event of the client saying the abuse was reported, the worker should consider if the disclosure needs to be reported at this time.

If the client says the abuse was never reported, the worker should attempt to ascertain if the alleged perpetrator could still pose a risk to others (for instance, are they still alive, where do they work).

This questioning needs to be done in a sensitive manner and the client should be informed that if the alleged perpetrator currently poses a risk to children, then action may be needed to be taken to safeguard them.

The client making the disclosure should be asked whether they want a Police investigation and should be advised of the Police's role in investigating matters of abuse with adults who are vulnerable because of mental health or learning difficulties.

All workers should be aware that if the person reports the matter to the Police, any notes taken by the professional may be subject to disclosure and/or a witness statement required. This ‘evidence of first complaint’ is an important evidential issue for sexual abuse cases. It is critical to handle these situations as sensitively as possible.

Where the alleged perpetrator can be identified because details such as name, date of birth/age, address etc are known, this information should be reported to the Police. If the alleged perpetrator is known to currently have contact with children, then in addition this needs to be reported to Children’s Services.

In the event of clients not consenting to share information with the Police, the duty to safeguard children will necessitate the need to share with Children’s Services with or without consent. The legal requirements for reporting these concerns will be explained sensitively.

In exceptional circumstances it may be necessary to breach the client’s confidentiality either with or without their immediate knowledge and consent. This could be the case where there are significant risks to the client’s psychological wellbeing; where the alleged perpetrator may be a current risk to others; or there is risk of jeopardising a potential investigation.

It is acknowledged that there may be implications for the professional relationship in circumstances involving a client not consenting to reporting allegations to the police and Children’s Services.

Clients should be provided with the necessary Complaints information.

Clients could be signposted to local, regional and national support groups and charities, such as Victim Support, Big Talk Education, The Survivors Trust.

It is expected that all workers are in regular discussion with Turtle Dove Cambridge Managing Director in circumstances involving safeguarding and historical abuse allegations, with these matters being discussed within supervision.

In the circumstance of an allegation being made against a professional, the allegations must be reported to the Local Authority Designated Officer (LADO) for the area in which the alleged abuse took place.

Local Authority Designated Officer (LADO)

When an allegation of abuse is made against an adult working with children, this is reported to the Local Authority Designated Officer (LADO). Every local authority must have a LADO in place who is responsible for co-ordinating the response to the allegation.

The procedures for managing allegations against adults who work or volunteer with children are to be used in respect of all cases in which it is alleged that a person who works with children has:

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

The LADO:

* Manages and oversees individual cases ensuring independent scrutiny.
* Liaises with police and other agencies and ensures the appropriate agencies are involved in the investigation.
* Ensures that child protection procedures are initiated where the child is at risk of significant harm.
* Provides advice and guidance to employers in relation to the adult’s suitability to remaining in post over the course of the investigation, considering risk assessments, completing investigations, proceeding with disciplinary procedures.
* Ensures issues of sharing information with parents and other relevant individuals and organisations are considered.
* Monitors progress of investigations to ensure timely responses.

The contact details of the relevant Local Authority LADO can be found by using a search engine.

Protection of Vulnerable Adults (POVA)

In line with the Care Act 2015 and the Health and Social Care Act 2008, Turtle Dove Cambridge has a responsibility for ensuring that all adults in receipt of services are free from abuse and that where abuse is suspected or there is evidence that this has occurred, the correct procedures are followed.   
This policy recognises the need for inter-agency working to address incidents of suspected and actual abuse from the Department of Health publication ‘No Secrets: Guidance on Developing and Implementing Multi-agency Policies and Procedures to Protect Vulnerable Adults from Abuse’.

We adhere to the guidance of ‘No Secrets’ guidance published by the Department of Health and Home Office November 2000 and the guidance of “In Safe Hands” published by the National Assembly for Wales and the Home Office in July 2000.

For the purpose of this policy the following definition of abuse applies;

* Abuse is any behaviour towards a person that deliberately or unknowingly causes him/her harm, endangers their life, and violates their rights
* Abuse may be physical, sexual, psychological, financial, through neglect or omission
* An individual, a group or an organisation may perpetrate abuse
* Abuse concerns the misuse of power; control and/or authority and can manifest itself as:
* Domestic violence, sexual assault, or sexual harassment
* Racially or religiously motivated assaults
* Discrimination and oppression

* Institutional abuse
* Ill treatment both physical and emotional
* Impairment of physical or mental health
* Avoidable deterioration in physical or mental health
* Impairment of physical, emotional, social, or behavioural development.

These last two categories apply particularly to the individual’s ability to recover from an illness or to have the best possible quality of life (The Lord Chancellor’s Department, 1997).   
  
Adults can be abused in any setting; where they live – their own home, or residential or nursing home, places where they spend their days – day centres, colleges, places of work. This list is not exhaustive.   
  
Perpetrators of abuse can be any of the following;

* Informal carers, this includes neighbours, friends, and relatives
* Partners, ex–partners and other family members
* People in a position of trust
* People paid to care/provide services
* Other users of services
* Strangers
* Organisations
* Those who deliberately target others in order to exploit them

For vulnerable adults there is the need to ensure that they are protected from financial abuse. Financial Abuse is the exploitation, inappropriate use or misappropriation of a person’s financial resources, property, pension, allowances, or insurance.   
  
This includes withholding money or the improper use of a person’s money or property or denying the rights of an adult who may be competent to handle their own financial affairs.   
  
Indicators are;

* Lack of money particularly after benefits have been paid
* Poorly explained withdrawals from accounts
* Lack of bill payments
* Disparity between income and living conditions
* Deputyship in place when the individual clearly has capacity to make this decision
* Changes to ownership of their own home
* Newly acquired ‘friends’ with concerning interests in the person and their money
* Reluctance to pay for essential clothing and food.
* Risk Factors may indicate that a person is being abused:
* Person is in receipt of high-rate benefits
* Person is unable to see to their own finances
* Person has a number of care givers/workers who have access to monies including PIN numbers
* Carers become financially dependent upon a person
* Person is socially isolated and receiving pressure from money lenders
* Person is known in their community as vulnerable
* Person has no independent advocate

**Procedure**

Where abuse is suspected this must be reported to the director without delay.

Concerns must be reported to the relevant Local Authority in which the service is located in the first instance. This will be completed by the associate, with the knowledge of the Designated Safeguarding Officer.

Where it is suspected that the director or Designated Safeguarding Officer of the service may be a potential perpetrator, the Whistleblowing Policy applies and the concerned member of staff may contact LADO.

**We guard against Abuse of Vulnerable Adults by;**

* All workers providing an up-to-date DBS check.
* We undertake pre-employment checks on all workers.
* If we receive any complaints relating to abuse of our clients by one of our workers, they will be suspended immediately pending enquiries.
* Where there is substantial evidence of harm a recommendation will be made to the POVA list.

**POVA list**  
Under circumstances of misconduct or harm caused by any of our workers we would abide by the Secretary of State’s proposal that a referral should be made for inclusion on the POVA list i.e., ‘where there is any action or inaction on the part of an individual who has harmed a vulnerable adult or placed a vulnerable adult at risk of harm.

We understand that as a minimum for inclusion on the POVA list the Secretary of State will require the following documents and information:

* Full name of individual
* Date of Birth
* National Insurance Number
* Last known address
* Confirmation that the individual was in a care position at the time of the misconduct
* Details of allegation of misconduct
* Detailed explanation of the misconduct
* Details of any investigation including statements
* Details of action taken
* Information on police involvement
* Details of proposed further action
* Any other information considered relevant

Referrals should be sent to:  
Independent Safeguarding Authority  
PO Box 181, Darlington DL1 9FA

Whistle Blowing

Whistle Blowing is the process which allows employees and carers to express their concerns without fear of the consequences. Turtle Dove Cambridge encourages a culture of transparency, professional curiosity and challenge, feedback and concerns relating to safeguarding are welcome.   
If workers feel that their concerns are not being responded to or taken seriously, it is expected that they would report them to relevant authorities, such as LADO (detailed below).   
Our organisation policy is that those who have raised concerns via a whistleblowing process should be supported.

Lone Working and Professional Boundaries

The scope of the services delivered by Turtle Dove Cambridge may on occasion involve lone working with young people and adults.

The purpose of a lone working policy is to communicate the risks presented by lone working, to identify the responsibilities each person has in the situation and to outline procedures to minimise such risks.

**Recommendations**

* Risk assessments of young people and adults to be completed prior to attendance at events.
* Events staff to have access to a phone in case of emergency.
* Risk assessment completed of location of event.
* In the circumstance of any lone working, (such as transport of young person), Managing Director to be aware of this.
* All workers to follow policies and procedures at all times.
* All workers to utilise de-escalation skills in the circumstance of a young person or adult becoming dysregulated.

Turtle Dove Cambridge is committed to assessing and reducing the risks involved when lone working is required. All workers are responsible to continuously assess and reduce risks to take care of their personal safety whilst working alone.

As an organisation working with child or young person, young people and adults at risk we wish to operate and promote good working practice. This will enable workers to run activities safely, develop good relationships and minimise the risk of false accusation.

As well as a general code of conduct for workers we also have specific good practice guidelines for every activity we are involved in.

Workers are advised not to accompany minors on an individual basis, and lone working is not encouraged, e.g. giving a lift in car, walking a young person home.

Workers should not give out personal contact information, e.g. email, telephone, addresses etc.

Workers should consider boundaries in conversation especially in respect to their personal lives and experiences.

**Workers must not give or loan young people money or belongings, or receive gifts from**

**young people. Please see our Gift & Hospitality Policy for further guidance.**

Workers should be careful not to make promises to young women, and should be consistent and equitable in the behaviour towards all young women whom they work with.

Workers are encouraged to seek supervision from Kate Nation, Managing Director & Designated Safeguarding Officer when they are uncomfortable or uncertain about their own emotional responses or behaviour in regard to working in Turtle Dove Cambridge and/or young women’s behaviour, or in regard to other worker’s behaviour towards young women.

We hope to create a safe contained environment for workers to feel comfortable to be able to talk about these concerns in confidence.

Turtle Dove Cambridge also has a referral form to be used by organisations (primarily CCC) that can be provided on request that conforms to data protection handling policy. An electronic system called UpShot is used to store and manage data, UpShot is GDPR compliant.

We have developed a photo permission/ consent form that conforms to data protection handling policy.

Turtle Dove Cambridge also has a ‘Introductory Video’ for young women that is presented and explained during referral and induction in regards to expectations and procedures whilst they are working with us.

Turtle Dove Cambridge has a ‘Terms of Engagement’ agreement with the young women. All of which can be viewed through request via [hello@turtledovecambridge.com](mailto:hello@turtledovecambridge.com).

**Working in Partnership**

The diversity of organisations and settings means there can be great variation in practice when it comes to safeguarding child or young person, young people and adults at risk. This can be because of cultural tradition, belief and religious practice or understanding, for example, of what constitutes abuse.

We therefore have clear guidelines in regards to our expectations of those with whom we work in partnership, whether in the UK or not. We will discuss with all partners our safeguarding expectations and have a partnership agreement for safeguarding. It is also our expectation that any organisation using our premises, as part of the letting agreement will have their own policy that meets ThirtyOne:Eight (Formerly CCPAS) safeguarding standards.

Good communication is essential in promoting safeguarding, both to those we wish to protect, to everyone involved in working with child or young person and adults at risk and to all those with whom we work in partnership. This safeguarding policy is just one means of promoting safeguarding.

Risk assessment

In drawing up and recording an assessment of risk the following issues should be considered, as appropriate to the circumstances:

* The environment – location, security, access
* The context – nature of the task, any special circumstances
* The individuals concerned – indicators of potential or actual risk
* History – any previous incidents in similar situations
* Any other special circumstances

**Allegations**  
Circumstances involving allegations against any workers is explained in the LADO section above.

Safer recruitment

Turtle Dove Cambridge recognise their responsibilities with regards to being diligent in exercising Safe Employment techniques both to reduce the risk of unsuitable adults being involved with our clients and to ensure that the Managing Director and all workers know how to best manage specific issues/situations and are aware of Turtle Dove Cambridge expectations around their conduct.

These include but are not limited to;

* Safe recruitment practices; (DBS, references)
* Job Description for all workers
* Staff induction and training that includes the organisation's procedures for safeguarding children
* Specific training for Designated Safeguarding Officer responsibility
* Procedures for dealing with allegations against employees and carers
* A Privacy policy (including Information Sharing and Data Protection)
* A Whistle Blowing policy
* A Compliments and Complaints policy

All delivery staff and volunteers will be required to complete mandatory trainings to ensure they are adequately equipped to perform their safeguarding responsibilities.

For volunteers in contact with young women and present at events the obligatory trainings are:

* Safeguarding children level 2
* Safeguarding adults level 2
* Prevent duty
* Food hygiene
* Allergen Awareness

Hours spent on training will be remunerated to volunteers in the form of Time Credits.

Paid staff in contact with young women and present at events are required to complete the following trainings:

* Safeguarding children level 3
* Safeguarding adults level 3
* Prevent duty
* Food hygiene
* Allergen Awareness
* Health and Safety
* First Aid

Staff will be compensated for hours spent on trainings.

All team members involved in delivery and in contact with service users are required to present a clear DBS as part of the appointment process. Turtle Dove will then conduct annual checks, at a minimum, on team members either via the update service or by requesting a new certificate. Turtle Dove will cover the expense of the initial DBS certificate, however team members are expected to pay for the DBS update subscription (if applicable) or any subsequent DBS certificates applied for.

**Legal Duty to Refer**

Turtle Dove Cambridge has a statutory duty under the Safeguarding Vulnerable Groups Act (2006) to refer any relevant information to the DBS if the Agency dismisses or removes an employee from working with children in what is legally defined as a regulated activity, because they meet the referral criteria.

Culture

Turtle Dove Cambridge is committed to ensuring a culture of best practice and excellence is embedded across the service.

**Key components to achieve this include;**

* Safeguarding policy and procedure
* Whistle-blowing policy
* Equality, Diversity & Inclusion policy
* Safer recruitment practices that embed safeguarding into all areas of the recruitment process
* Designated safeguarding lead
* Safeguarding Consultant availability
* Relevant and up to date safeguarding training
* Code of conduct (safe working practices)
* Regular supervision which includes safeguarding concerns
* Culture of professional curiosity and challenge

This policy can be supplied in different formats appropriate to the individual needs of those may need to read it. Please contact, [hello@turtledovecambridge.com](mailto:hello@turtledovecambridge.com).

It has been approved by the Managing Director and is one component of the robust and rigorous quality assurance processes and practices.

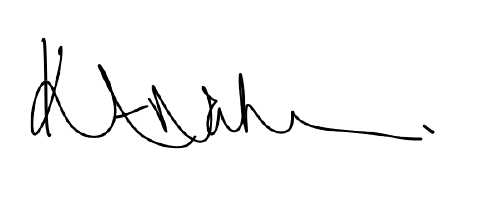
We are committed to reviewing our policies and good practice annually, or more frequently if required.

Signed

**Reviewed and Amended by**: Kate Nation & Kim Mabbutt  
**Date:**

**Ratified at Board:**

**Signed:**

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**Kate Nation**

**Managing Director and Co-founder  
Appendix 1**

**Leadership Safeguarding Statement**

Kate Nation (Managing Director and Designated Safeguarding Lead) and the board recognises the importance of its work with child or young person and young people and adults in need of protection and its responsibility to protect everyone entrusted to our care.

The following statement was agreed by the leadership/organisation on 26.06.14

This organisation is committed to the safeguarding of child or young person and adults at risk and ensuring their well-being.

**Specifically:**

* We recognise that we all have a responsibility to help prevent the physical, sexual, emotional abuse and neglect of child or young person and young people (those under 18 years of age) and to report any such abuse that we discover or suspect.
* We believe every child or young person should be valued, safe and happy. We want to make sure that child or young person we have contact with know this and are empowered to tell us if they are suffering harm.
* All child or young person and young people have the right to be treated with respect, to be listened to and to be protected from all forms of abuse.
* We recognise that we all have a responsibility to help prevent the physical, sexual, psychological, financial and discriminatory abuse and neglect of adults at risk and to report any such abuse that we discover or suspect.
* We recognise the personal dignity and rights of adults at risk and will ensure all our policies and procedures reflect this.
* We believe all adults should enjoy and have access to every aspect of the life of the organisation unless they pose a risk to the safety of those we serve.
* We undertake to exercise proper care in the appointment and selection of all those who will work with child or young person and adults at risk.

**We are committed to:**

* Following the requirements for UK legislation in relation to safeguarding child or young person and adults at risk and good practice recommendations.
* Respecting the rights of child or young person as described in the UN Convention on the Rights of the Child or young person.
* Implementing the requirements of legislation in regard to people with disabilities.
* Ensuring that workers adhere to the agreed procedures of our safeguarding policy.
* Keeping up to date with national and local developments relating to safeguarding.
* Following any denominational or organisational guidelines in relation to safeguarding child or young person and adults in need of protection.
* Supporting the safeguarding co-ordinator/s in their work and in any action, they may need to take in order to protect child or young person/adults at risk.
* Ensuring that everyone agrees to abide by these recommendations and the guidelines established by this organisation.
* Supporting parents and families
* Nurturing, protecting and safeguarding of child or young person and young people
* Supporting, resourcing, training, monitoring and providing supervision to all those who undertake this work.
* Supporting all in the organisation affected by abuse.
* Adopting and following the ‘Safe and Secure’ safeguarding standards developed by ThirtyOne:Eight (Formerly CCPAS).

**We recognise:**

* Children’s Social Care (or equivalent) has lead responsibility for investigating all allegations or suspicions of abuse/radicalisation where there are concerns about a child or young person. Adult Social Care (or equivalent) has lead responsibility for investigating all allegations or suspicions of abuse/radicalisation where there are concerns about a vulnerable adult.
* Where an allegation suggests that a criminal offence may have been committed then the Police should be contacted as a matter of urgency.
* Where working outside of the UK, concerns will be reported to the appropriate agencies in the country in which we operate, and their procedures followed, and in addition we will report concerns to our agency’s headquarters.
* Safeguarding is everyone’s responsibility.