



Safeguarding Policies and Procedure

All information in this Policy was up to date at the time of its creation. This policy is to be used alongside working practice. For the purpose of the policy the role of the Designated Safeguarding Officer currently resides the management team.

Link to Change works in line with local authority and national recommended safeguarding practices.

Aims of the Policies

- Will ensure that all staff, volunteers and trustees see it as part of their duty of care to be alert to signs of abuse.
- To ensure that staff, volunteers and trustees are carefully selected and trained in safeguarding procedures.
- To ensure that all children, young people and adults at risk work in safe environments with people they can trust.
- To ensure that all risks that children, young people and adults at risk encounter are carefully assessed and all necessary steps are taken to minimise and manage them (see general risk assessment).
- To ensure that prompt and appropriate action is taken where there is concern that there may be a threat to the wellbeing of a child, young person or adults at risk.
- To ensure that parents, children, young people and adults at risk know how to voice concerns about anything they may not be happy with.

Objectives of the Policies

- To implement clear staff, volunteer and trustee selection and recruitment procedures, which include, in all circumstances;
 - A Disclosure and Barring Service (DBS) check. Portability will be allowed if registered appropriately.
 - Completed application form.
 - Two references, one from their last employer and another from somebody who has worked with them either on a voluntary or professional basis. For volunteers an alternative reference could be from a respected figure within their community. Both references will be followed up verbally.
 - An interview.
- To provide all staff, volunteers and trustees with this policy.
- All staff, volunteers and trustees will agree to abide by its procedures.
- All staff, volunteers and trustees will report any concerns to the CEO/Project Manager.
- All members of staff, volunteers and trustees will follow this procedure.
- All confidential information will be kept securely by the organisation.
- Staff, volunteers and trustees will attend relevant training on a regular basis to ensure that Link to Change can take appropriate action when required.

Implementation and Monitoring

- If anyone feels that the Link to Change has failed to meet the practice contained in this policy, they will be encouraged to use the Link to Change's Complaints and/or Grievance Procedure.
- The Board and Senior Management team have the responsibility for ensuring the effective implementation and monitoring of this policy.
- Every member of staff, volunteer and trustee also has a personal responsibility to implement this policy through his or her practice. This Policy forms part of the Employment Terms & Conditions between the individual (including volunteer and trustees), and Link to Change.
- The CEO will draw attention to policy and procedures on a regular basis and update staff, volunteers and trustees of any changes immediately.

Introduction

Link to Change is fully committed to safeguarding the welfare of all children, young people and adults at risk who come into contact with its services, by protecting them from physical, sexual and emotional harm and neglect. All



individuals without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.

Neglect: The persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of the individual's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Sexual Abuse: Involves forcing or enticing a child, young person or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the individual is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving the individual in looking at, or in the production of, sexual images, watching sexual activities, encouraging individuals to behave in sexually inappropriate ways, or grooming an individual in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Emotional Abuse: The persistent emotional maltreatment of an individual such as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to an individual 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 individual opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on individuals. These may include interactions that are beyond an individual's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the individual participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing individual's frequently to feel frightened or in danger, or the exploitation or corruption of an individual. Some level of emotional abuse is involved in all types of maltreatment of an individual, though it may occur alone.

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

Sexual Exploitation: Sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child, young person or adult at risk to participate in sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Criminal Exploitation: As set out in the **Serious Violence Strategy**, published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child, young person or adult at risk into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Extremism: Extremism goes beyond terrorism and includes people who target the vulnerable including the young by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.



Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

Female Genital Mutilation: FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

Domestic Violence/Abuse: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. The Government definition, which is not a legal definition, includes so called 'honour' based violence, including FGM and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

Trafficking: Trafficking and modern slavery are abuse. Children, young people or adults at risk are recruited, moved or transported and then exploited, forced to work or sold. They are trafficked for: sexual exploitation, benefit fraud, forced marriage, domestic servitude such as cleaning, childcare, cooking, forced labour in factories or agriculture, criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft. Many are trafficked into the UK from abroad, but they can also be trafficked from one part of the UK to another.

Introduction to Exploitation

Exploitation is rarely visible on the streets. In any event, street based exploitation of children, young people and adults at risk is only a small part of the bigger picture of the exploitation of adults and their peers. Exploitation can include a wide variety of different types of abuse, including; sexual, criminal and physical.

A growing number of those that are being exploited are exploited by adults, older young people or young people their own age they meet via the internet. This "hi-tech" access to groom others for abuse has contributed to the invisibility of the exploitation of children, young people and vulnerable adults.

Victims can be any age. They come from all cultures and backgrounds and include a significant proportion of children who are "looked after". Vulnerability and low self-esteem are the most common factors amongst those who are at risk of being exploited.

Peers who are already involved sometimes draw others into exploitation. Individuals can be coerced by adults who pose as friends or potential partners and may be physically and emotionally dependent upon them. This dependence may be reinforced by giving something that the victim may need or want. Over time, access to friends and family often becomes curtailed and the individual becomes alienated from agencies that may be able to identify and interrupt the abuse.

It is important to identify perpetrators, including alleged perpetrators, to the police through identified channels, so that they can respond to concerns and take appropriate action in respect of any criminal offences. Criminal exploitation can often involve the commissioning of the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking' as defined by the Modern Slavery Act 2015.



Link to Change recognises the difficulty that many vulnerable young people have with transition to adult services; therefore Link to Change's projects are open to young people up to their 26th birthday. Link to Change also recognises that children with disabilities are also vulnerable to sexual exploitation.

Principles

The principles underpinning our service delivery are that exploitation requires a multi-agency response and that:

- Exploitation includes sexual, physical, child and emotional abuse, as well as, in some cases, neglect.
- Children, young people and adults at risk do not make informed choices to enter or remain in exploitation, but do so from coercion, enticement, manipulation or desperation.
- Children under 16 cannot consent to sexual activity and sexual activity with children under the age of 13 is statutory rape.
- Exploited children, young people and adults at risk should be treated as victims of abuse, not as offenders. Children under 18 will always be dealt with as actual or potential victims.
- Many sexually exploited individuals have difficulty distinguishing between their own choices around sex and sexuality and the sexual activities they are coerced into. This potential confusion needs to be handled with care and sensitivity.
- The primary law enforcement effort must be against the coercers and abusers, who may be adult, but could also be the child's peers or young people who are older than the individual. Potential perpetrators should be identified and referred to the police as part of the multi-agency process. Prosecutions should be brought against the perpetrators under the relevant laws and legislation.
- Multi-agency evidence gathering is part of the process of disrupting perpetrators. Link to Change is committed to sharing information which will serve to protect individuals and convict perpetrators. There is no conflict with service user confidentiality policies.

Referral

When a referral is received with concerns about possible exploitation the services manager or other relevant member of staff should use the risk assessment guidance in this protocol to form a view about whether the child, young person or adult at risk appears to be at low, medium or high risk of exploitation. If the allocated practitioner has any doubts or concerns of the risk assessment they should immediately consult their manager.

Risk should be defined using the accepted risk assessment developed by the National Working Group and LSCB and adopted by Link to Change.

Risk Assessment

The needs of children, young people and adults at risk who are being or are likely to be sexually exploited will change over time. Service responses need to be flexible to respond to these changes. Early intervention is essential to prevent escalation of harm.

While most interventions with those young people whose needs are in Level 1 will be preventative work in schools, through youth services and children's services providers, emergency crisis intervention might be required. Link to Change can provide training to the children's workforce to improve the identification and referral of children at risk of sexual exploitation.

Interventions with young people who have been identified as having in their lives risk factors in Levels 2 and 3 should be coordinated by the lead professional identified from a multi-agency team; this may or may not be the Link to



Change specialist exploitation worker. Assertive and therapeutic outreach is likely to be required by specialist trained exploitation workers when a child, young person or adult at risk has been identified as having risk factors in Level 2 and it is recommended as being necessary for those categorised as having Level 3 risk factors present. Link to Change will provide therapeutic outreach to young people identified at risk level 2 and 3.

An exit from exploitation is possible from any of the stages. Experience has shown that young people can be supported away from sexual exploitation where LSCBs have an active protocol, a group of professionals have allocated responsibility for monitoring young people's progress and a dedicated service is provided within the area. Link to Change will work with specialist multi-agency taskforces such as a MASH to protect individuals from exploitation.

This risk assessment framework indicates when intervention, support and action are required for children, young people and adults at risk at any given time. The assessment should be made on the basis of known risk indicators or immediate vulnerability factors, as well as recognition of a history of disadvantage or background vulnerability factors. The risk assessment diagram can be used to enable all professionals to be aware of the types of indicators of harm likely to be present when a child or young person is being or is likely to be sexually exploited. Identifying the presence of these risk factors can help professionals decide what level and types of interventions may be appropriate. Link to Change follows the guidance on exploitation risk assessments from the Local Authority the referral is received from. These decisions about services provision should also address relevant information relating to the individuals personal and family history including:

- Social exclusion (exclusion/truancy from school, from health services)
- Poverty and deprivation
- Prior experience of sexual, physical and/or emotional abuse
- Prevalence of informal economies
- Familial and community offending patterns
- Prevalence of undiagnosed mental health problems

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Level 1-Low Risk:

A vulnerable child, young person or adult at risk, who is at risk of being targeted and groomed for exploitation.

Level 2- Medium Risk:

A child, young person or adult at risk, who appears to be targeted for opportunistic abuse through the exchange of sex for drugs, accommodation (overnight stays) and goods etc. Coercion and control are likely to be significant factors.

Level 3- High Risk:

A child, young person or adult at risk whose exploitation is entrenched. Coercion and control is implicit in such situations.

Information Sharing

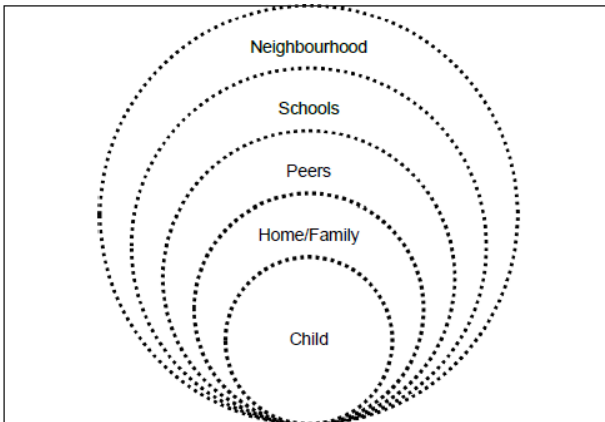
Please see the information sharing policy and procedure for more details.

Contextual Safeguarding

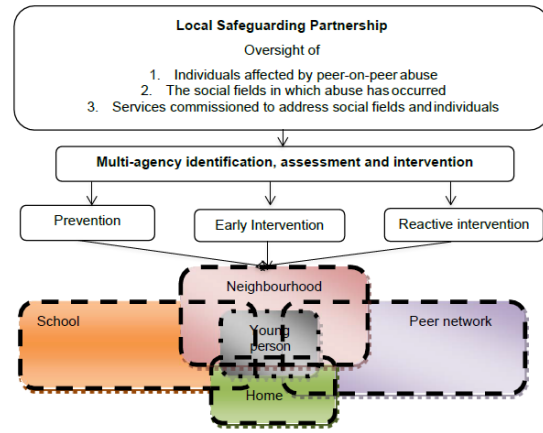
Contextual safeguarding is an approach developed by the University of Bedfordshire (Firmin 2017) to understanding, and responding to an individual's experiences of significant harm beyond their families. It expands the objectives of the child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts. It recognises the weight of peer influence on the decisions that young people make, extends the notion of 'capacity to



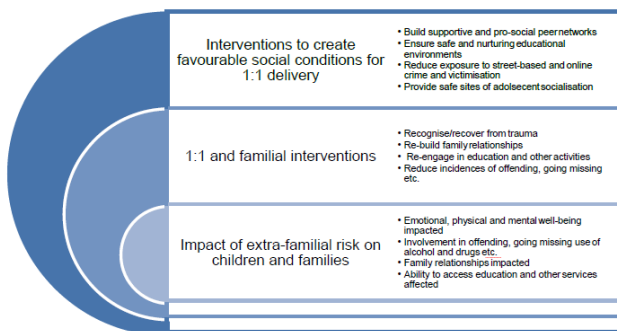
safeguarding' to sectors that operate beyond families and provides a framework where referrals can be made for contextual interventions. Link to Change considers and operates under a contextual safeguarding framework with all of its children, young people and vulnerable adults.



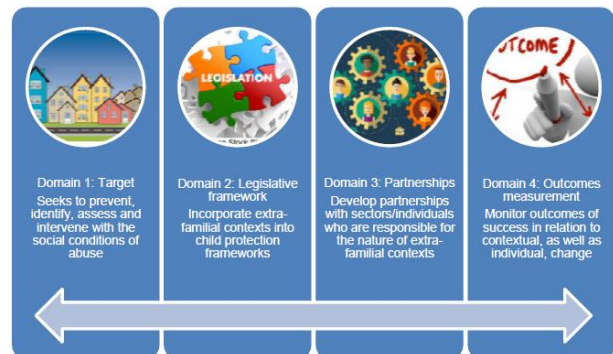
Contexts of Adolescent Safety and Vulnerability (Firmin 2013)



Contextual Safeguarding Framework (Firmin 2015)



Role of Contextual Interventions (Firmin 2016)



Four domains of Contextual Safeguarding (Firmin 2016)

Procedures

Working Ratios

The Department of Education (DoE) no longer provides guidance in relation to working ratios with children over five. Link to Change suggests the following ratios, which have been agreed as a sensible ratio by the DoE:

- A ratio of 1:4 where the element of risk would be similar to the risks encountered in everyday life
- A ratio of 1:4 for all day and residential events and trips
- A ratio of 1:3 for children under the age of 10, or groups with special needs
- A ratio of 1:2 for high risk activities
- 1-2-1 appointments must be carried out in a risk assessed environment

The above ratios are for Link to Change organised activities, staff may attend externally organised youth activities with different ratios by agreement between the organisations.

Risk Assessment and Lone Working

Link to Change has a risk assessment and lone working policy and guidance that must be followed when either working on a 1-2-1 basis or any other activities with multiple service users.



Link to Change requires:

- Employees to attend recognised Safeguarding awareness training every two years.
- Volunteers to complete recognised awareness training on Safeguarding Policies and Procedures.
- Relevant personnel, such as the designated safeguarding officer, to receive advisory information and training outlining good practice and informing them about what to do if they have any concerns about children or young people's safety.
- Attendance of updated training when necessary.

Link to Change's Statutory Obligations

Link to Change is under statutory obligation to inform the appropriate authorities:

1. Where there is knowledge or suspicion of sexual exploitation
2. Where there is knowledge or suspicion of concealment of money made through drug trafficking (non-disclosure is an offence under the Drug Trafficking Act 1989, section 27)
3. Where there is knowledge or suspicion of an act of terrorism
4. Where there is knowledge or suspicion of human trafficking
5. Where there is knowledge or suspicion of modern slavery

Clients will not be informed of such action, as this would also constitute an offence.

Safeguarding Leads at Link to Change

Hayley Brown- Chief Executive
Kelly Panaghiston- Operations Manager
Luis Ingram- Services Manager
Rowan Moore- Board of Trustees

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Approved by the Board: June 2021

Reviewed: December 2020

Approved by Board: January 2021