

It's the policy of **Active Growth Ltd** and **Palace Paddlers**, here after referred to as **AGL**, to safeguard the welfare of those aged under 18, as well as adults at risk by protecting them from neglect and from physical, sexual and emotional harm. The Safeguarding Policy is for everyone involved with AGL and includes all volunteers and staff. Where there are concerns that a staff member has not followed the code of practice or procedures, the matter must be reported to the management team who will co-ordinate any investigation in partnership with the appropriate authorities.

This Safeguarding policy underpins everything AGL do to develop skills and capabilities in others. It offers guidance for anyone who has a concern about the welfare of a young person or adult at risk, and how to report a safeguarding allegation or disclosure.

It includes information about adults at risk.

Guidance is provided around how to support **adults at risk**, our responsibilities, reasonable adjustments to make and how to raise concerns.

The new policy also covers the various types of abuse and exploitation a young person or adult at risk may suffer or be at risk of harm from, including **self-harm or self-neglect, addiction, exploitation** and **harmful traditional practices**.

The policy also refers to specialist areas that may need to be managed using the safeguarding processes, and where further support can be provided – such as **mental wellbeing, radicalisation** and **transitioning**.

AGL understand that **safeguarding is everyone's responsibility** and it is embedded across our organisation.

**We recognise that the welfare of children, young people and adults at risk is paramount and that all children, young people and adults at risk, regardless of age, disability, gender, gender reassignment, pregnancy, maternity, marriage/civil partnership, race, religion and/or sexual orientation (all defined as protected characteristics within the Equality Act 2010) have the right to equal protection from all types of harm or abuse.**

**Working in partnership with children, young people, adults at risk and their family, support network, volunteers and staff is essential in promoting and embedding this policy. This is a national policy and subject to the laws and guidance of England, Wales, Scotland and Northern Island; it's also in-line with the Local Safeguarding Partnerships in England, Wales (previously LSCB) and Scottish and Northern Ireland counterparts.**

In AGL, we use the definition of **young person**, but this policy and its procedures reflect statutory safeguarding legislation which utilises the terminology children and young people. We define **children and young people** as anyone that is under 18.

We define an **adult at risk** as a person aged 18 or over who:

- Needs care and support, and/or
- Is unable to protect their own wellbeing because of their care and support needs; or
- Is experiencing, or at risk of, abuse, neglect or exploitation

This policy addresses the transition period from young person to adult, and reference will be made to people aged 17.5 years as this is defined in statutory legislation. We recognise that adults at risk may have additional and/or complex needs. In certain circumstances, they can be particularly vulnerable to abuse.

This policy sets out our commitment to;

- Take reasonable and appropriate steps to safeguard and promote the welfare of adults at risk whilst in our care; and
- Make reasonable adjustments with regard to additional and complex needs.

Someone can have complex needs because of learning or physical disabilities, autism, mental health, acquired brain injury or dementia. This can also be combined with physical health needs, such as epilepsy or sensory issues. Additional needs are when an individual has a difficulty, whether physical, emotional, behavioural, learning disability or impairment which causes them to require additional or specialised services or accommodation, including educational or recreational.

**If any adult is unable to understand and/or uphold this safeguarding policy or is unable to safeguard children or young people, then they cannot be considered for adult appointments with AGL.**

The policy underpins every aspect of the work and service AGL deliver to develop skills in others. AGL acknowledge their responsibility to safeguard and promote the welfare of all young people and adults who participate or work within the organisation. AGL staff are committed to safeguarding and making it integral to all the work that's completed by them. We're committed to making sure all our activities and engagement within the wider community are held to the highest standards of safeguarding practice, are compliant with current legislation, and are fully accountable to the appropriate external scrutiny, including Scouts and other youth services.

We're invested in making sure our safeguarding practice places the importance of the individual at the centre of our policy planning and implementation processes. This approach makes sure that the welfare of young people and adults at risk remains paramount in all we do. Establishing a culture of honesty, openness and psychological safety helps us to recognise issues that impact on people or that an individual may consider likely to impact on them or their safety. This is particularly important when working with diverse communities or those who have additional and complex needs, to make sure that AGL continually learns and adapts their practice. Although young people and adults at risk can experience the same types of harm and the causes are often similar, adults at risk have a right to make a choice in regards to AGL's actions. Where a child has suffered or is at risk of suffering significant harm, statutory agencies will be informed, whether the parents/carers are in agreement or not. Sometimes adults at risk may not wish for statutory agencies to be informed. Therefore concerns in regards to adults at risk that reach the safeguarding threshold for reporting must be referred into our independent Safeguarding advisors, and they'll assess the concern, liaise and take appropriate action.

- Observing the rules established for the safety and security of children and young people through processes, procedures and guidance provided, promoting and prioritising their safety and wellbeing.
- Following the procedures on receipt of any allegations, or concerns raised.
- Recognising the position of trust in which individuals have been placed.
- Making sure that all children and young people, and specifically those who are vulnerable, are kept safe from harm while involved in any event or activities.
- Working in partnership with statutory safeguarding agencies and other organisations. AGL will refer an adult staff member to a statutory agency if we have significant concerns about their suitability to work with children and young people, or if we have to exclude them from the organisation in line with relevant national legislation.
- When necessary, sharing information with other organisations about individuals or an incident, even when there's no concern about abuse or harm. If this happens, AGL will only share information with the explicit consent of the individuals concerned or if there's a duty to refer.
- Engaging with statutory agencies. Sometimes AGL will need to refer matters without the consent of the child and parent/carer. This is done in circumstances where a statutory agency requests we do so because they're undertaking a wider investigation or where there may be concerns that a child may be harmed if the parent/carer is informed. In all cases, the relevant legislation pertinent to where the young person lives or the location of any alleged offence informs AGL's action.
- Taking all measures to strengthen and improve our practice. Our practice is subject to a regular cycle of review and we'll communicate this

through a robust and comprehensive training package and updates, which all staff must keep up to date with.

- Understanding that some people may not report abuse endured at the time it occurred, especially if the abuse happened while they were a child. We'd encourage anyone who feels they have an allegation or a concern from the past to come forward and talk directly to the relevant authorities. All conversations will be dealt with sensitively and only shared to ensure the on-going safety of children. Sometimes we may report to statutory or other appropriate agencies if a child may be currently at harm or if a crime's been committed. This will be fully explained to the individual and our independent Safeguarding advisors will offer support throughout the process.

## ***Adult at risk guidance***

### Principles

The principles of this adult at risk guidance are:

- **Empowerment** – putting people first and helping all feel involved and informed
- **Protection** – supporting individuals so they can take action
- **Prevention** – responding quickly to suspected cases of abuse
- **Proportionality** – making sure what we do is appropriate to the situation and for the individual
- **Partnership** – sharing the right information in the right way
- **Accountability** – making sure all volunteers, staff and trustees have a clear role when dealing with adults at risk.

## ***Responsibilities***

It's the responsibility of all staff to:

- Promote and prioritise the safety and wellbeing of adults at risk alongside young people.
- Make sure that everyone's clear about their roles and responsibilities in respect of safeguarding and be provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to adults at risk.
- Securely maintain the confidentiality of any records in guidance by GDPR of all adult at risk safeguarding concerns.
- Make sure that all adults undertaking roles and responsibilities with adults at risk are appropriately checked as per AGL's vetting policy, including where they're engaged in **regulated activity with adults**, undertaking the relevant disclosure check (DBS enhanced check).

- Make sure that all reports of suspected or alleged abuse are taken seriously and are responded to and reported appropriately in line with this policy.
- Make sure adults are provided with opportunities to disclose any relevant details about their circumstances and that where appropriate, this information will be treated with confidentiality.
- Prevent the participation of unsuitable individuals through the robust use of disclosure checking as they apply in England, and the application of best practice in the safe recruitment of staff and volunteers working with children, young people and adults at risk.
- Make sure that robust safeguarding arrangements and procedures are in operation and address without delay any failure to comply with this policy.

**If any adult's unable to understand and/or uphold the Safeguarding policy or is unable to safeguard children or young people, then they cannot be considered for adult appointments.**

- AGL's mandatory safeguarding training incorporates adult at risk advice that will assist in recognising any concerns, what to do and where to report. There's also a reporting process for raising concerns within the adult at risk process. All concerns that reach the safeguarding threshold MUST be reported to the management team.
- An adult at risk is an individual who has reached the age of 18 years

### ***Types of abuse and exploitation***

Types of abuse and exploitation (defined by legislation or relevant guidance)

Abuse is a form of maltreatment and can either be inflicted by others or self-inflicted. Abuse can take place at home, education or within any physical environment. It can also happen in an online or virtual environment such as social media or gaming apps. An abuser can be anyone, but they're often known by the young person or adult at risk. An abuser may make every effort to build a trusting relationship with the young person or adult at risk and will often befriend or seek to maintain the respect of friends and colleagues. This is grooming behaviour. Abuse can occur in any relationship at any time. It can occur within any community, culture or religion. It may result in significant harm to, or exploitation of, the person subjected to it.

### ***Types of abuse and exploitation***

**Emotional/psychological** – persistent emotional maltreatment of a person that results in their wellbeing or development being impaired. Some form of emotional abuse is involved in all types of abuse, but can also occur on its own.

**Physical** – is an individual's body being injured or hurt, e.g. hitting, pushing or assault.

**Physical abuse** can also be in other forms, e.g. poisoning, inflicting illness upon another. It's an intentional act.

**Sexual** – involvement in a sexual act where the person doesn't wish to be involved, doesn't have the understanding to make an informed choice or through coercion, e.g. rape, sexual assault, inappropriate touching or exposure. It may also include sexual exploitation, where gifts or bribes are offered. Sexual abuse can also occur across electronic devices or social media.

**Neglect/act of omission** – the failure to prevent harm that may damage, impair the growth or development of a child or young person by not meeting their basic physical or mental needs.

**Peer on peer abuse** – children and young people can also be abusers of other children, usually through bullying, sexual abuse, physical abuse, issues online, youth produced sexual images or any form of initiation.

### ***Further types of harm and abuse***

**Bullying** – is a pattern of behaviour that can be threatening, aggressive, intimidating, abusive, insulting, offensive, cruel, vindictive, humiliating, degrading or demeaning. It can happen between young people, adults, in groups or singularly. It can happen within the 'real world' or online.

**Online bullying or cyberbullying** – happens across social media networks, when gaming or via mobile phones. Examples can include posting offensive material, and spreading rumours or embarrassing images.

**'Sexting' (including youth produced sexual images)** – when someone shares sexual, naked or semi-naked images of themselves or others or sends sexually explicit pictures. Sharing, possession or distribution of such images of a person under the age of 18 is illegal in the UK. There are also criminal offences in regards to adults posting sexual images of other adults in certain circumstances.

**Drug or alcohol misuse** – is a pattern of behaviour which changes or alters the mood or mental state of an individual. Not all substances that can cause harm are illegal but should not be permitted within the context of AGL's adventurous activities.

**Self-harm or self-neglect** – deliberately causing harm to yourself by either hurting or putting yourself in harm's way. Self-harm is mainly a coping strategy which young people adopt to release emotional stress. Self-neglect is the failure to care for yourself, e.g. personal hygiene, health or environment.

**Addiction** – is the inability to stop a particular behaviour (alcohol, drugs, gambling etc) which can impact relationships, health, finances and career. Addiction often co-occurs with other issues and it can make people vulnerable to coercion and/or mental health issues.

## ***Exploitation***

**Sexual** – is where individuals are coerced into any form of sexual activity by power, money or status.

**Modern slavery/human trafficking** – includes forced labour, domestic servitude, coercion, deceiving or forcing an individual into a life of abuse/servitude, e.g. prostitution or drug running.

**Gang** – a group of people (any age) with a defined leadership and internal organisation that identifies with or claims control over territory in a community and engages, either individually or collectively, in illegal and possibly violent behaviour.

**County lines** – is a term used when drug gangs from cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting children and vulnerable adults to sell drugs.

Harmful traditional practices

**Forced marriage** – when someone's forced into a marriage without their consent, where violence or threats are used in the form of coercion to this end. This practice is illegal in the UK.

**Female genital mutilation** – refers to a procedure which intentionally alters or causes injury to the female genital organs for non-medical reasons and without their informed consent. It can occur in the UK or an individual may be taken outside of the UK. It is illegal in the UK.

**Honour based violence** – when incidents or crimes are committed to protect or defend the family's honour/or of the community.

**Domestic (relationship) abuse** – is abuse or violence in a relationship. It's a pattern of behaviour that can be a form of abuse and its purpose is to assert power over another. From 2018, stalking is also included in this definition. It also includes coercive behaviour. Such abuse can happen to young people and adults.

**Financial** – the theft or control of a person's property or assets.

**Discrimination** – when someone's targeted because of a difference, e.g. race, sex, gender, age, disability, religion or belief, sexual preference, appearance or cultural background, pregnancy and maternity, marriage or civil partnership.

**Organisational/institutional** – where an organisation fails to prevent repeated maltreatment, abuse or neglect of children or adults at risk.

### **Specialist areas of safeguarding**

Safeguarding is an underpinning principle of everything we do in AGL. Sometimes a particular aspect of working with children and young people is not in itself a safeguarding issue but may need to be managed by utilising safeguarding processes.

### ***Mental wellbeing***

AGL are committed to creating activities and environments that improve individual wellbeing and mental health. AGL include staff trained in Mental Health First Aid (MHFA).

Mental wellbeing is how an individual copes with the normal stresses of life, can work productively and can make a contribution to their community. Anyone can experience good or poor mental wellbeing at any point in their lives.

Mental health problems may vary in terms of strength and frequency of re-occurrence; they can take the form of an occasional crisis or a steady state over many years. Some individuals with a mental health issue can be at risk as they develop potentially harmful coping strategies, e.g. anxiety attacks, self-harm or suicidal ideation. There may be a small risk in terms of aggressive behaviour.

We recognise that AGL has a legal duty under the Equality and Diversity Act to ensure accessibility for all, but also that AGL provides opportunities for young people to get together, build connections and friendships and provide peer support among themselves. This can help to build tolerance and empathy amongst young people and can be particularly powerful for groups of young people known to be at risk of developing mental health problems. AGL seeks to encourage any person who is facing mental health problems to talk to parents, guardians, teachers and supervisors to secure access to help as required. Supporting young people or adults at risk with mental health issues and assessing any risk to them or others is part of our wider safeguarding duties.



## ***Radicalisation***

Protecting children from the risk of radicalisation is seen as part of AGL's wider safeguarding duties and is similar in nature to protecting children from other grooming behaviours. AGL staff should be able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. We seek to build children and young people's resilience to radicalisation by promoting our values and creating psychologically safe environments that enable and empower them to challenge extremist views.

It's important to emphasise that we don't seek to control or preclude open discussion of controversial issues. AGL aims to provide a safe space in which children and young people can understand the risks associated with radicalisation if this arises and develop the knowledge and skills to be able to challenge extremist arguments and indoctrination. While we don't have a legal duty under the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism' (the 'Prevent duty'), we take all aspects of the safety and welfare of our young people seriously.

Radicalisation can occur within any community if extremist views are left unchallenged.

**Further information:** You can get further information on radicalisation from ACT Early website and training available through the government [PREVENT elearning training package](#). Don't forget that any concern for a AGL staff member or client relating to radicalisation must be reported to the management Team.

## ***Transitioning***

AGL is an organisation that places value in our inclusivity and actively promotes our equal opportunities policy. AGL welcomes members regardless of their sexual orientation or gender identity. Transgender or 'trans' is an umbrella term used to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth. A person may live or be considering living in their self-identified gender; going through what's known as transition, being known by a different name, wearing different clothes and/or concealing parts of their body. The person may or may not decide to have gender reassignment to permanently alter their body to match their self-identified gender. A person may call themselves transgender or 'trans' for short. However, they may simply live as their acquired gender and not want others to know they are transgender.

A person of any age over 18 years may choose to apply for a Gender Recognition Certificate (GRC), as a legal recognition of their acquired gender. This isn't compulsory and is often not applied for.

AGL recognises the importance and benefit of supporting an individual, either adult or young person, who's transitioning or identifies as transgender. It's important to recognise that a trans person is at particular risk of physical, sexual and emotional abuse.

Similar to many individuals, a trans person may seek support and access to networks of those sharing similar views and feelings online. The same principle applies when supporting young people who identify as non-binary or gender neutral.

### ***Roles and responsibilities for safeguarding***

Everyone within AGL must fully understand and implement the safeguarding policies and procedures relevant to their role. To enable this to happen, we have a comprehensive training programme and a safeguarding structure that makes sure we're proactively safeguarding across the organisation.