



Treasures Foundation is a registered Charity No: 1131292 and a company limited by guarantee in England and Wales, No 6937026 Address: Treasures Foundation, Crown House, 27 Old Gloucester Street, London. WC1N 3AX

Email: info@treasuresfoundation.org

CHILD SAFEGUARDING POLICY & PROCEDURES	
Approved:	July 2026
For Review:	July 2027 or after any serious incident
Previous Versions:	July 25

CONTENTS:

Key Contacts	p
What to Do Quick Reference Flowchart – Anyone	p
What to Do Quick Reference Flowchart – DSO, DDSO, trustees	p
1. Introduction & Scope	p
2. Types & Signs of Abuse	p
3. Procedures and Principles	p
4. Responsibility, DSO & Risk Assessment	p
5. Children, Parents and Guardians of Children or Adults at risk Supported or Cared for by Treasures	p
6. Beneficiaries' Views & Involvement	p
7. Instruction and Training	p
8. Associated Policies, Procedures & Legislation	p
9. Code of Conduct	p
10. Equality and Diversity	p

11. Concerns and Allegations of Abuse	p
12. Detailed Disclosure Procedures	P
13. Whistleblowing	p
14. Monitoring and audit	p
Appendix 1 – Types & Indicators of Abuse	p
Appendix 2 – Key Responsibilities of the DSO	p
Appendix 3 – Safeguarding Form – Hard Copy	p
Appendix 4 – Reporting Concerns & Incidents	p
Appendix 5 – Safeguarding Duties for Charity Trustees	p
Appendix 6 – Other Useful Contact Details	p
Appendix 7 – Read and understood template	p
Appendix 8 – Risk assessment template	p

KEY CONTACTS

Designated Safeguarding Officer Jade Wye, COO

Telephone: 07709893742

Email: jade@treasuresfoundation.org

Should the allegation be about the COO, or if COO is unavailable, then you can contact Mandy Ogunmokun, CEO on:

Telephone: 07950585947

Email: mandy@treasuresfoundation.org

Deputy Designated Safeguarding Officer

Trustee Board Level Contacts

1. Michaela Lydon: michalea_lydon@hotmail.co.uk

2. Verna Wilks: vernawilks@yahoo.co.uk

If you have any urgent concerns that require immediate action you can call the police on 999.

A less urgent number for the police is 101. www.met.police.uk

Adult Social Services at Newham Council is **0203 373 0440**.

<https://adultsocialcare.newham.gov.uk/pages/what-happens-when-you-make-a-referral.aspx>

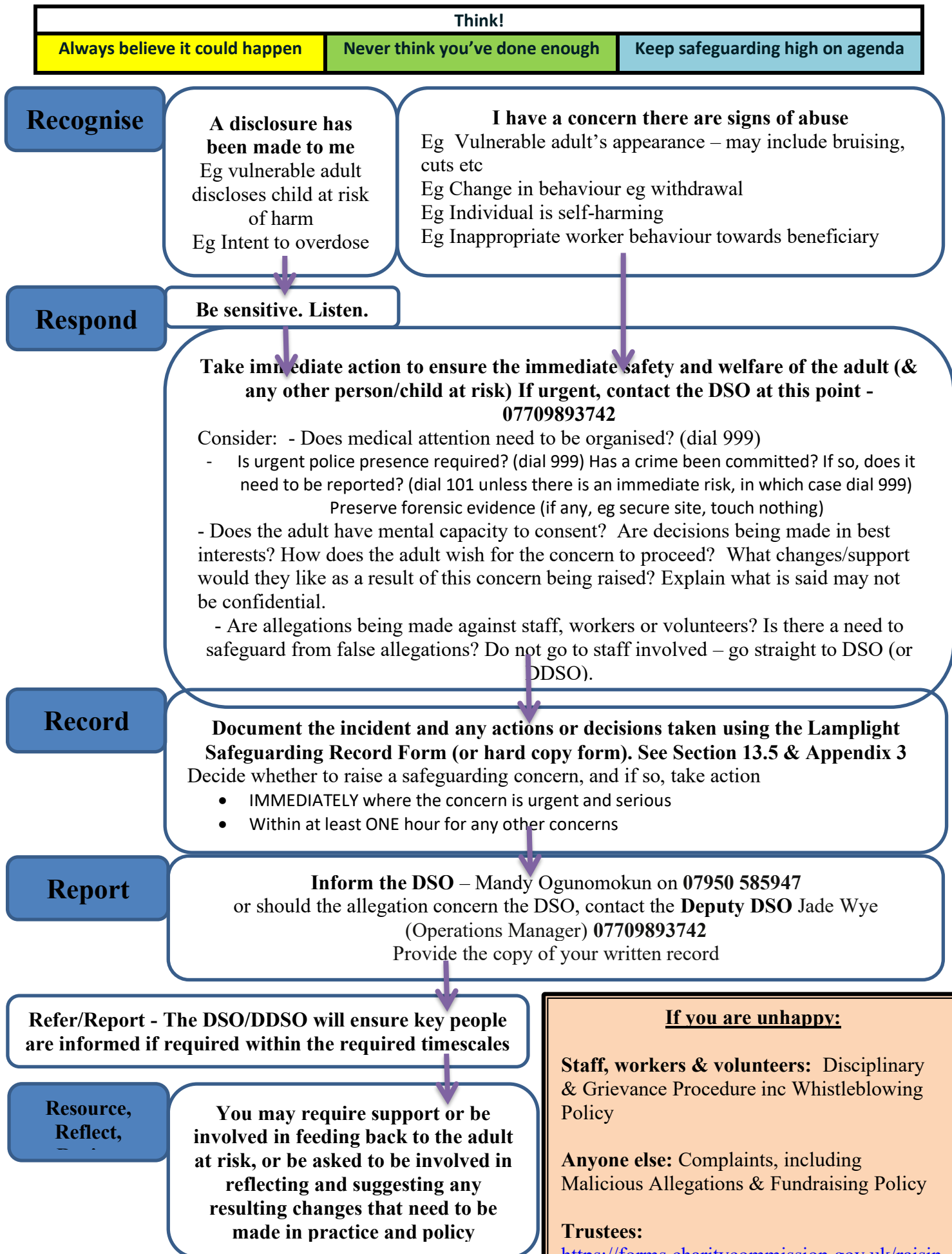
[How to raise a concern about an adult – What is safeguarding and how to raise a concern – Newham Council](#)

Children's Social Care is: **0203 373 4600**.

<https://families.newham.gov.uk/kb5/newham/directory/family.page?familychannel=7>

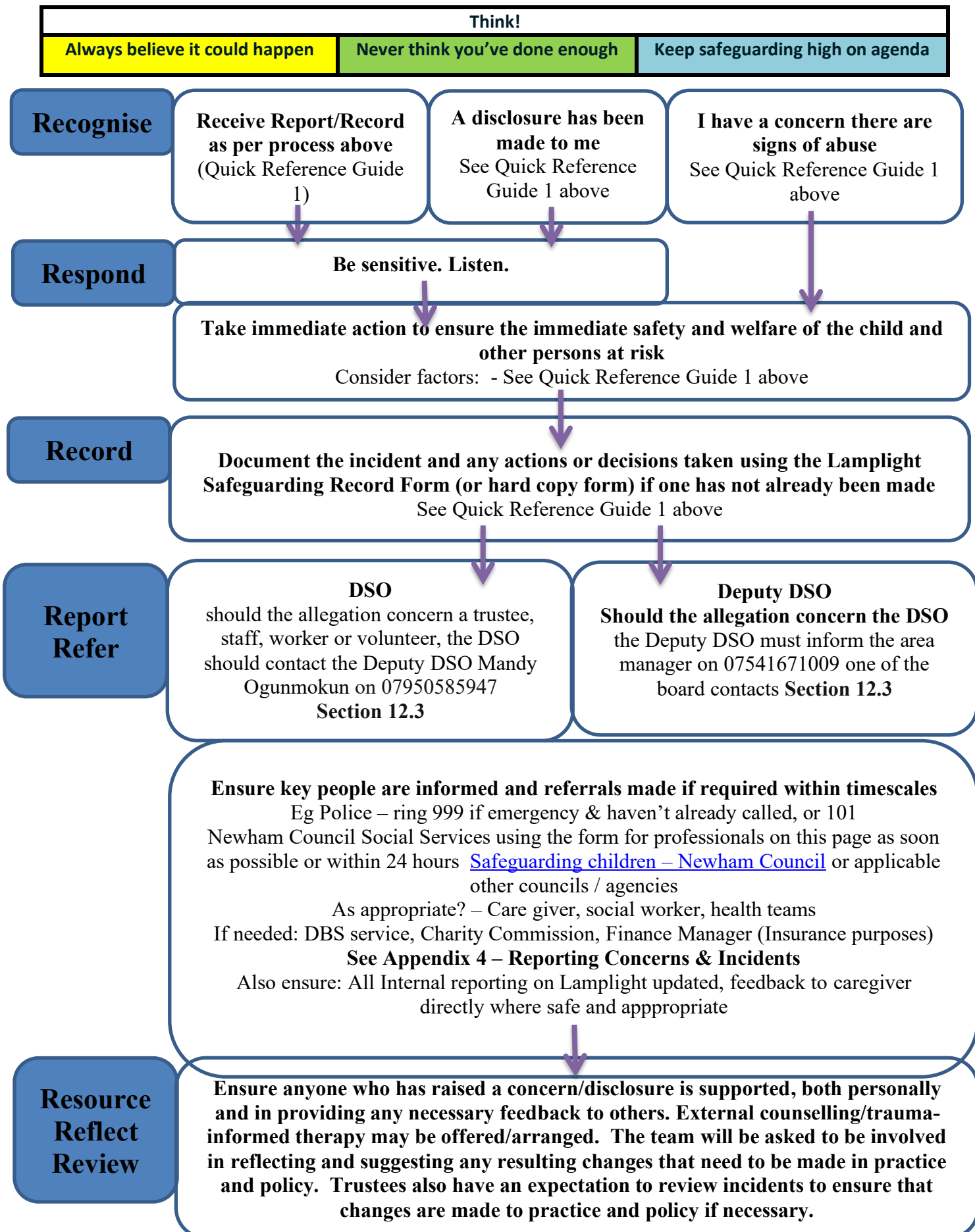
[Thirtyone:eight: Safeguarding Helpine & DBS service : 0303 003 11 11](#)

Safeguarding Quick Reference 1 – “What to do... anyone”



Safeguarding Quick Reference 2

- What more to do... DSO, DDSO, Trustees



1. Introduction & Scope

1.1. Treasures Foundation is committed to safeguarding and promoting the welfare of any child or adult at risk, whether that child or adult at risk is supported or cared for by Treasures or comes into contact with our work. We endeavour to protect those we work with by implementing a trauma informed approach.

1.2 Treasures adopts the definition of a 'child' from NSPCC which says,

"a child is defined as anyone who has not yet reached their 18th birthday. Child protection guidance points out that even if a child has reached 16 years old and is

- Living independently
- In further education
- A member of the armed forces
- In hospital
- In custody in the secure estate

They are still legally children and should be given the same protection and entitlement as any other child."

1.3. The purpose of this policy document is to set out Treasures' policies and procedures in regards to the safeguarding of children at risk and child protection.

1.4 The relevant legislation and other statutory and supporting reference documents are listed in **Section 9 – 'Associated policies, procedures & legislation.**

1.5 This policy applies to all Trustees, staff, volunteers, contractors, beneficiaries and those coming into contact with Treasures' beneficiaries through Treasures' work.

1.6. All new Trustees, staff and volunteers and contractors will be sent email copies of this policy and be informed of its content during their induction process. There is a requirement to sign to say the policy has been read and understood.

1.7 Existing trustees, staff, contractors and volunteers will be sent email copies of this policy and be informed of changes annually at review and during internal training.

1.8 This policy is available publicly online at [Policies - Treasures Foundation](#). Treasures' Beneficiaries and staff will be informed they can access it there. A hard copy will be available to anyone on request.

1.9 This policy is available in paper copy at any properties lived in by resident beneficiaries where they have a licence with us. It is also available in the Dropbox folder that can be accessed by staff and volunteers.

1.10 Treasures adopts the Think! Approach

Think!		
Always believe it could happen	Never think you've done enough	Keep safeguarding high on the agenda

2. Types and Signs of abuse

2.1 Signs and types of abuse vary, and may vary according to age. The types of abuse are categorised as follows:

- | | |
|-------------------------------|---|
| - Physical abuse | - Domestic violence or abuse |
| - Sexual abuse | - Psychological or emotional abuse |
| - Financial or material abuse | - Modern slavery |
| - Discriminatory abuse | - Organisational or institutional abuse |
| - Neglect or acts of omission | - Self-neglect |

2.2 Detailed information on these and possible indicators of abuse is provided in training and can be found in **Appendix 1** and at the following link:

2.3 Evidence of any one indicator from the following lists should not be taken on its own as proof that abuse is occurring. However, it should alert staff to make further assessments and to consider other associated factors. The lists of possible indicators and examples of behaviour are not exhaustive and people may be subject to a number of abuse types at the same time.

3. Procedures and Principles

3.1 Treasures Safeguarding procedures are specifically set out as follows:

- i) 'Quick reference Guides - What to Do' – a clear & helpful summary
- ii) Section 12 – Concerns and Allegations of Abuse
- iii) Section 13 – Detailed Disclosure Procedures

3.2 In all Safeguarding matters, Treasures will uphold the following principles:

- i) Ensuring the welfare of the individual is paramount; this includes all persons involved, including those making allegations, those who are alleged to have committed abuse, those affected by abuse and those incidentally affected
- ii) Ensuring all individuals have the right to protection from abuse, regardless of:

- age,
- disability,
- gender reassignment,
- race,
- religion or belief,
- sex
- sexual orientation,
- marriage and civil partnership
- pregnancy and maternity
- being or becoming a transsexual person

These nine categories/characteristics are known as 'Protected Characteristics' under the Equality Act 2010.

iii) Preventing abuse, including enabling beneficiaries to protect themselves from harm, including self-harm and self-neglect.

viii) Opposing all forms of modern slavery, people trafficking, sexual exploitation, extremism and any other forms of abuse.

iv) Taking seriously all allegations or complaints of abuse whether past or current, made by beneficiaries, staff or third parties, inside or outside Treasures

v) Responding to any suspicion or concern of abuse through internal action and external reporting.

vi) Recording and investigating any allegation made in a timely fashion and within Treasures' internal procedures

vii) Following external multi-agency procedures for investigating abuse and ensuring our procedures are consistent and updated with the law, Government policy ie Charity Commission, and the Safeguarding Policy and Procedures/Guidelines of the relevant Local Authority – Newham Council

viii) Acknowledging that many of our beneficiaries, also trustees, staff, workers and volunteers, may have previously experienced abuse or neglect at the hands of others .

ix) Offering external counselling, help and support to beneficiaries, staff, workers and volunteers involved in cases of abuse, whether current or past.

x) Regularly reviewing risks, including safeguarding risks. This is recorded on the Health & Safety Risk Assessment Policy as well as the Business Plan.

xi) Training trustees, staff, workers and volunteers annually on safeguarding

3.3 All Trustees are fully committed to ensuring this Policy and its associated Procedures are implicit in any decision or policy making.

3.4 This Policy will be monitored through regular review at the Trustee's meeting with updates provided by the CEO who is the Designated Safeguarding Officer.

4. Responsibility, DSO & Risk Assessment

4.1 Although everyone has both a corporate and an individual responsibility for protecting children and adults at risk, one person will be assigned the role as the Designated Safeguarding Officer. For Treasures this is the COO, Jade Wye. The Deputy is Mandy Ogunmokun, CEO Officer. Contact details on 'Key Contacts' page.

4.2 The Designated Safeguarding Officer or Lead is the person who has responsibility for ensuring a company's safeguarding policy is adhered to. An overview of the key responsibilities can be found in **Appendix 2**.

4.3 If a member of staff, worker or volunteer has a safeguarding concern, the DSO can be contacted immediately, without having to go through usual lines of supervision accountability.

4.4 Safeguarding is integral across Treasures' day to day work, business plan, and other policies such as Recruitment, Finance and Health, Safety & Risk Assessments. For example, Treasures' referral form for new resident beneficiaries considers potential Safeguarding Risks that will be taken account in any decision making and possible future staffing needs.

4.5 Treasures ensures risk assessments on activities are carried out, regularly reviewed and updated. Due diligence checks for activities and new services ensures that therapists and contractors are appropriately recruited, enabling us to maintain an approved contractor list.

4.6 Trustees are responsible to ensure they have a clear understanding of their duties under law and how these link to Safeguarding across all areas of Treasures' work. For a reminder, see **Appendix 5 Safeguarding Duties for Charity Trustees**. This includes Financial Safeguarding (see Finance Policy) and working with, or making grants to other organisations.

4.7 Those attending external training on Safeguarding will be expected to inform and feedback to the Designated Safeguarding Officer and Quality Manager for CPD purposes.

4.8 Insurance – Treasures has a responsibility to let insurers know of any possible Safeguarding Claims

4.9 Medication – No medication is administered by Treasures on or off site.

5. Children, Parents and Guardians of Children or Adults at Risk Supported or Cared for by Treasures

5.1 Children - Treasures allows children on site to visit as authorised by the CEO or COO. Treasures also owns a caravan for respite for families of Treasures beneficiaries. For the purpose of this Policy a child is defined as a person being under the age of 18. Since all young people up to the age of 18 are considered under law to be children, Treasures considers this Policy to apply to any young person aged less than 18 who uses the services of the Treasures or enters Treasures property. Children must remain with the resident beneficiary whilst at Treasures at all times. The NSPCC

have resources and standards to follow in relation to the safeguarding of children. [NSPCC safeguarding standards and guidance | NSPCC Learning](#)

5.2 Wherever Treasures delivers a service to young people or adults at risk under the age of 18, it will ensure a formal inter-agency agreement is in place with the appropriate local authority.

5.3 All parents or guardians of children at risk supported or cared for by Treasures must be informed of this Policy.

5.4 Due to potential conflicts of interest, Treasures' trustees, staff, workers or volunteers will not act as guardians of either children or vulnerable adults cared for or supported by us.

6. Beneficiaries' Views & Involvement

6.1. It is essential that Treasures maintains a culture of listening to and encouraging a dialogue with the individuals receiving support or care from Treasures. How this is undertaken will be appropriate to the age, understanding and circumstances surrounding individuals involved. This will ensure that beneficiaries are empowered to voice their opinions about the service they receive and any concerns they might have.

6.2 Treasures' staff will work actively with beneficiaries to listen to feedback and influence policy writing.

6.3 Beneficiaries' views on the policy given at the 6 monthly beneficiary policy group.

7. Instruction and Training

7.1 As part of the induction process, staff, workers, volunteers and Trustees will be trained on key Safeguarding and Child Protection issues; this will enable them to deal with the safeguarding and promotion of the welfare of children and adults at risk.

7.2 Staff, contractors, volunteers and trustees will be instructed internally at least annually on Treasures' Policy and Procedure in relation to Safeguarding. Additionally, there is an expectation that Safeguarding Training will be taken once every 12 months on a rolling basis to ensure that there are always a number of individuals with current training.

7.3 Regular staff and volunteer supervision will include questions to ensure a working knowledge and understanding on Safeguarding issues and the policy in practice.

7.4 The COO will keep a record of internal and external training undertaken.

8. Associated Policies, Procedures & Legislation

8.1 The relevant legislation, and other supporting reference documents, for this Policy are:

- The Children Act 1989 and the Children Act 2004.
- The Government's publication: Working Together to Safeguard Children (2015) (a guide to inter-agency working to safeguard and promote the welfare of children)
- Government policy on the welfare of children: Every Child Matters (guidance which not only sets out a duty to cooperate to promote the well-being of children and young people, but also a duty to make arrangements to safeguard and promote the welfare of children and young people).
- Government publication: PREVENT Strategy (2011) (includes guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism).
- Safeguarding Vulnerable Groups Act 2010.
- Equality Act 2010
- Care Act 2014
- The Health and Social Care Act 2008
- The Mental Capacity Act 2005
- United Convention of the Rights of the Child 1991.
- Data Protection Act 1998.
- Human Rights Act 1998
- Public Interest Disclosure Act 1998
- Freedom of Information Act 2000
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Deprivation of Liberty Safeguards, Code of Practice 2008.
- Protection of Freedoms Act 2012.
- Children and Families Act 2014
- Special Educational Needs and Disability (SEND) code of practice: 0 to 25 years- Statutory guidance for organisations which work with and support children and young people who have SEND: HM Government 2014.

8.2 Treasures' policies and procedures should be read in conjunction with this policy.

These are:

- GDPR Policy
- Health & Safety & Risk Assessment Policy
- Business Plan (Risk Management)
- Cyber Policy (For review: Rename Cyber & Digital Safety Policy)
- Whistle Blowing
- Disciplinary
- Trustee Induction & Offer to serve

- Code of Conduct
- Complaints Procedure including Malicious Allegations
- Volunteer Policy

9. Code of Conduct

9.1 Treasures Code of Conduct includes Confidentiality, E-safety, lone working, bullying. It includes clear expectations of what people should do and say, and what they must not. This helps raise awareness of illegal, unsafe, unprofessional, and unwise behaviour. Being clear about standards of behaviour is an important part of safeguarding.

9.2 Whilst writing our Code of Conduct, Treasures followed the Charity Commission guidance:

- i. Involve staff, volunteers and even your participants in creating the code so you can make sure people feel it protects everyone.
- ii. Make sure everyone in the organisation is aware it applies to them and they must follow all its standards.
- iii. Being clear about what will happen if someone doesn't follow it.
- iv. Include specific standards or expectations for roles with particular responsibilities if necessary.
- v. Keep a record to show that all your staff and volunteers have seen and understood it and agree to follow it.
- vi. Made sure the code allows participants to challenge staff and volunteers if they think one another needs further support or they are doing something questionable.

10. Equality and Diversity

10.1. Treasures upholds the principle of equality for all as a framework. This enables individuals to access opportunities, participate, and contribute in ways that are fair and inclusive, avoiding discrimination, and challenging inappropriate attitudes.

10.2. Recognising that it works with and serves individuals in a diverse society, Treasures seeks to act in a fair and equitable way to all.

10.3. In respect of this Safeguarding Policy, Treasures will communicate the contents of this Policy to staff and beneficiaries using suitable methods, taking into consideration language and literacy issues.

10.4. Where necessary, vulnerable beneficiaries will be supported when discussing any concerns raised under this Policy.

11. Concerns and Allegations of Abuse

11.1. Treasures will act in a timely and decisive manor in response to any concerns or allegations of abuse regarding children and made against staff, contractors, trustees or volunteers. Treasures will take seriously allegations made against beneficiaries, by other beneficiaries.

11.2. All concerns or allegations will be treated seriously and in accordance with Treasures' Safeguarding Procedures and applicable other policies eg Code of Conduct, Disciplinary & Grievance Procedure and Complaints. This latter policy also deals with vexatious and malicious complaints.

11.3 Where an allegation is made against a staff member, contractor or volunteer, that individual will not be able to contact the house, its individuals (whether through any means eg telephone/text/social media/personal visits), until the matter has been resolved. This will be overseen by either the DSO and the Deputy DSO or, if the allegation is in regard to the DSO, the Deputy DSO with both the Area Manager and any of the Board level Trustee contacts detailed above.

11.4 Treasures will inform outside agencies such as Police, DBS service and Social Services as appropriate and in accordance with inter-agency procedural arrangements.

12.5 For concerns and allegations that arise in local area, reference must be made to the Local Authority safeguarding procedures.

12.6 To avoid abuse and allegations of abuse staff, contractors, volunteers and beneficiaries should avoid ambiguous or inappropriate behaviour such as initiating physical contact. Staff should not take any pictures of child beneficiaries and the children should not be posted on social media.

12.7 Treasures adopt NCVO's **Five statements that help encourage people to speak up.**

- i. We must all stand up for people who can't speak up for themselves.
- ii. Speaking up if you're worried someone is harming or abusing someone else is always the right thing to do. It's not the same as 'snitching' or 'being a grass'.
- iii. People are often worried that if they report someone for doing wrong, they'll hurt that person. But doing nothing could hurt others even more.
- iv. There are many reasons why people might feel uncomfortable or be scared to report suspicions of abuse. That's ok. It's worth fighting those fears so you can help someone.
- v. If you speak up, your organisation should protect you and make sure you're not harmed or criticised for it.

12. Detailed Disclosure Procedures

12.1 Managing safeguarding concerns, responding and reporting Safeguarding is everyone's responsibility and it is vital that, if you are in contact with vulnerable groups (children, young people and adults at risk) as part of your role, you have undertaken safeguarding training. If staff haven't yet completed this, they must inform the COO who will be able to advise how to access this.

12.2 Training will allow staff to **RECOGNISE** some of the signs and symptoms that could suggest abuse is taking place and allow staff to share concerns appropriately, ensuring that the correct authority is made aware so that the concern can be followed up (we never investigate). The following guidelines are the same for Whistleblowing.

12.3 It is also possible that someone will want to talk to you about abuse that they have suffered. It may still be happening currently or could be historic and have happened in the past, all disclosures should be dealt with in the same way.

12.4 As well as acting where abuse is suspected it may be that a disclosure is made. If someone discloses to you, please remember the following as you **RESPOND** to them:

- i. **LISTEN.** Let the person tell their story and don't push for information. Repeat back what they have said to ensure clarity if that will help.
- ii. Remember it is never your role to investigate, just gather information to aid those whose job it is (police / social services).
- iii. Always show acceptance of what you are being told, whatever your personal opinion might be. It takes a lot of courage to disclose abuse so the discloser will need to feel believed.
- iv. Keep calm and reassure the person that they aren't to blame for what has happened to them (victims / survivors of abuse frequently feel that they are).
- v. Make sure you maintain eye contact to demonstrate that you are listening even if the discloser isn't always looking at you – this will be a difficult process for them.
- vi. Be honest, never make promises to keep what you are being told confidential. If abuse is involved, you will need to tell someone.
- vii. Try to involve them as much as you can in the ongoing process, let them know who needs to be told and what will happen, involving them in decisions where appropriate. Never forget that in the case of a child, their welfare comes before anything else; they are at the centre of everything.

12.5 Once you have heard the disclosure, it is very important that you **RECORD** in writing what you have been told as soon as possible – within one hour if at all possible. Use the form in **Appendix 3** if you cannot use Lamplight. This will allow you to record what you've heard as accurately as possible. Where necessary take precautions to preserve forensic evidence.

Make sure you:

- i. Use the words that the child used – not your interpretation of what has been said. Sometimes we misunderstand what we have been told and are tempted to re-phrase what we have been told. Ensure this doesn't happen.
- ii. Include any responses that you made.
- iii. Keep the report succinct and to the point.
- iv. Make sure the names of all those involved are clear.
- v. Record the date, time and place of the disclosure.
- vi. Record what actions you have taken and your rationale for taking these actions.
- vii. Make sure your name is clear at the end of the record.
- viii. Send a copy of the record to the Designated Safeguarding Officer (the CEO) and keep the Treasures record securely within the office in the agreed locked filing system, if it has not been inputted onto the secure Lamplight database.

12.6 You will need to **REPORT** what you have been told (or seen) to the Designated Safeguarding Officer who will be able to offer advice on next actions and support you to **REFER** your concerns to the appropriate authority.

12.7 **DSO Reporting/Referring** The DSO or DDSO will escalate the concern/disclosure appropriately, within the required timescales.

Eg Police – ring 999 if emergency & haven't already called, or 101

Newham Council Social Services using the form for professionals on this page as soon as possible or within 24 hours

As appropriate – GP, other health professionals, social worker, police

Also ensure: All Internal reporting on Lamplight updated

12.8 Depending on the nature of the concern/disclosure made, a report to trustees and other agencies may be necessary. For example, the Charity Commission, Finance Manager (for Insurance purposes) and/or the DBS service. More information and examples of incidents that may or may not need to be escalated are provided in **Appendix 4 – Reporting Concerns & Incidents**

12.9 **RESOURCE, REFLECT & REVIEW** – Treasures will ensure that anyone raising a concern/allegation will be supported, both personally and in any necessary feeding back. This may involve offering external counselling, reflecting on the incident and reviewing practice and policy as a team. Trustees also have an expectation to review incidents to ensure that changes are made to practice and policy if necessary.

12.10 To summarise –

RECOGNISE	the signs that could indicate abuse is happening to a child / young person
RESPOND	sensitively to the person and listen to what they have to say, don't attempt to investigate

RECORD	what you have been told factually and accurately using the language used by the person disclosing within an hour
REPORT	immediately to your Safeguarding Officer who will know who to seek support from
REFER	to the appropriate statutory authority

This guidance took into account material from:

[Safeguarding and protecting people for charities and trustees - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

NCVO [Policies and procedures — NCVO Knowhow](https://knowhow.ncvo.org.uk/safeguarding)

<https://knowhow.ncvo.org.uk/safeguarding>

[Reporting & Recording Safeguarding Issues - Ann Craft Trust](#)

NSPCC 'Example of a safeguarding policy'

CCPAS

Federation for small business

13 Whistleblowing

13.1 The aim of including whistleblowing in the safeguarding policy is to support a working environment and culture for individuals in which areas of concern raised will be reported and treated seriously when it is about a possible danger, misconduct, or financial malpractice that may affect beneficiaries, staff or Treasures Foundation itself in order to provide our staff with a safe, secure and honest environment to work in. The Public Interest Disclosure Act 1998 protects workers that disclose information about malpractice at their workplace, or former work place, provided certain conditions are met.

"Whistleblowing" is when a worker reports suspected wrongdoing at work. Officially this is called "making a disclosure in the public interest". A worker can report things that aren't right, are illegal or if anyone at work is neglecting their duties, including:

- Someone's health and safety is in danger
- Damage to the environment
- A criminal offence
- The company or charity isn't obeying the law
- Covering up wrongdoing

14. Monitoring and Audit

What in the policy is going to be monitored	Monitoring method	Who will lead the monitoring?	How often?	Where will it be reported?
Safeguarding - activity & trends	Reports from lamplight	Safeguarding lead with keyworker	Quarterly	Trustee meeting
Domestic violence trends	Domestic violence group verbal communication Reports from lamplight	Beneficiary with the support of safeguarding lead	Quarterly, after every round of freedom program group	Trustee meeting

Appendix 1: Types & Signs of Abuse

Signs of abuse can often be difficult to detect. This 'At a glance' briefing aims to help people who come into contact with people with care and support needs to identify abuse and recognise possible indicators. Many types of abuse are also criminal offences and should be treated as such.

PHYSICAL ABUSE - Types of	Possible indicators
- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing - Rough handling - Scalding and burning - Physical punishments - Inappropriate or unlawful use of restraint - Making someone purposefully uncomfortable (e.g. opening a window and removing blankets) - Involuntary isolation or confinement - Misuse of medication (e.g. over-sedation) - Forcible feeding or withholding food - Unauthorised restraint, restricting movement (e.g. tying someone to a chair)	- No explanation for injuries or inconsistency with the account of what happened - Injuries are inconsistent with the person's lifestyle - Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps - Frequent injuries - Unexplained falls - Subdued or changed behaviour in the presence of a particular person - Signs of malnutrition - Failure to seek medical treatment or frequent changes of GP

DOMESTIC VIOLENCE/ABUSE - Types of	Possible indicators
- Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to: psychological, physical, sexual, financial, emotional. - Domestic violence and abuse includes 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. It also includes so called 'honour' -based violence, female genital mutilation and forced marriage. - Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include: - acts of assault, threats, humiliation and intimidation - harming, punishing, or frightening the person - isolating the person from sources of support - exploitation of resources or money - preventing the person from escaping abuse - regulating everyday behaviour.	- Low self-esteem - Feeling that the abuse is their fault when it is not - Physical evidence of violence such as bruising, cuts, broken bones - Verbal abuse and humiliation in front of others - Fear of outside intervention - Damage to home or property - Isolation – not seeing friends and family - Limited access to money

SEXUAL ABUSE - Types of	Possible indicators
- Rape, attempted rape or sexual assault - Inappropriate touch anywhere - Non- consensual masturbation of either or both persons - Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth - Any sexual activity that the person lacks the capacity to consent to - Inappropriate looking, sexual teasing or innuendo or sexual harassment - Sexual photography or forced use of pornography or witnessing of sexual acts - Indecent exposure	- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck - Torn, stained or bloody underclothing - Bleeding, pain or itching in the genital area - Unusual difficulty in walking or sitting - Foreign bodies in genital or rectal openings - Infections, unexplained genital discharge, or sexually transmitted diseases - Pregnancy in a woman who is unable to consent to sexual intercourse - The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude - Incontinence not related to any medical diagnosis - Self-harming - Poor concentration, withdrawal, sleep disturbance - Excessive fear/apprehension of, or withdrawal from, relationships - Fear of receiving help with personal care - Reluctance to be alone with a particular person

PSYCHOLOGICAL/EMOTIONAL ABUSE - Types of	Possible indicators
- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends - Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance - Preventing someone from meeting their religious and cultural needs - Preventing the expression of choice and opinion - Failure to respect privacy - Preventing stimulation, meaningful occupation or activities - Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse - Addressing a person in a patronising or infantilising way - Threats of harm or abandonment - Cyber bullying	- An air of silence when a particular person is present - Withdrawal or change in the psychological state of the person - Insomnia - Low self-esteem - Uncooperative and aggressive behaviour - A change of appetite, weight loss/gain - Signs of distress: tearfulness, anger - Apparent false claims, by someone involved with the person, to attract unnecessary treatment

FINANCIAL/MATERIAL ABUSE - Types of	Possible indicators
- Theft of money or possessions - Fraud, scamming - Preventing a person from accessing their own money, benefits or assets - Employees taking a loan from a person using the service - Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions - Arranging less care than is needed to save money to maximise inheritance - Denying assistance to manage/monitor financial affairs - Denying assistance to access benefits - Misuse of personal allowance in a care home - Misuse of benefits or direct payments in a family home - Someone moving into a person's home and living rent free without agreement or under duress - False representation, using another person's bank account, cards or documents - Exploitation of a person's money or assets, e.g. unauthorised use of a car - Misuse of a power of attorney, deputy, appointeeship or other legal authority - Rogue trading – eg. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship	- Missing personal possessions - Unexplained lack of money or inability to maintain lifestyle - Unexplained withdrawal of funds from accounts - Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity - Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so - The person allocated to manage financial affairs is evasive or uncooperative - The family or others show unusual interest in the assets of the person - Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA - Recent changes in deeds or title to property - Rent arrears and eviction notices - A lack of clear financial accounts held by a care home or service - Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person - Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house - Unnecessary property repairs

MODERN SLAVERY - Types of	Possible indicators
- Human trafficking - Forced labour - Domestic servitude - Sexual exploitation, such as escort work, prostitution and pornography - Debt bondage – being forced to work to pay off debts that realistically they never will be able to	- Signs of physical or emotional abuse - Appearing to be malnourished, unkempt or withdrawn - Isolation from the community, seeming under the control or influence of others - Living in dirty, cramped or overcrowded accommodation and or living and working at the same address - Lack of personal effects or identification documents - Always wearing the same clothes - Avoidance of eye contact, appearing frightened or hesitant to talk to strangers - Fear of law enforcers

DISCRIMINATORY ABUSE - Types of	Possible indicators
- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010) - Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic - Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader - Harassment or deliberate exclusion on the grounds of a protected characteristic - Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic - Substandard service provision relating to a protected characteristic	- The person appears withdrawn and isolated - Expressions of anger, frustration, fear or anxiety - The support on offer does not take account of the person's individual needs in terms of a protected characteristic

ORGANISATIONAL/INSTITUTIONAL ABUSE - Types of	Possible indicators
- Discouraging visits or the involvement of relatives or friends - Run-down or overcrowded establishment - Authoritarian management or rigid regimes - Lack of leadership and supervision - Insufficient staff or high turnover resulting in poor quality care - Abusive and disrespectful attitudes towards people using the service - Inappropriate use of restraints - Lack of respect for dignity and privacy - Failure to manage residents with abusive behaviour - Not providing adequate food and drink, or assistance with eating - Not offering choice or promoting independence - Misuse of medication - Failure to provide care with dentures, spectacles or hearing aids - Not taking account of individuals' cultural, religious or ethnic needs - Failure to respond to abuse appropriately - Interference with personal correspondence or communication - Failure to respond to complaints	- Lack of flexibility and choice for people using the service - Inadequate staffing levels - People being hungry or dehydrated - Poor standards of care - Lack of personal clothing and possessions and communal use of personal items - Lack of adequate procedures - Poor record-keeping and missing documents - Absence of visitors - Few social, recreational and educational activities - Public discussion of personal matters - Unnecessary exposure during bathing or using the toilet - Absence of individual care plans - Lack of management overview and support

NEGLECT/ACTS OF OMISSION - Types of	Possible indicators
- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care - Providing care in a way that the person dislikes - Failure to administer medication as prescribed - Refusal of access to visitors - Not taking account of individuals' cultural, religious or ethnic needs - Not taking account of educational, social and recreational needs - Ignoring or isolating the person - Preventing the person from making their own decisions - Preventing access to glasses, hearing aids, dentures, etc. - Failure to ensure privacy and dignity	- Poor environment – dirty or unhygienic - Poor physical condition and/or personal hygiene - Pressure sores or ulcers - Malnutrition or unexplained weight loss - Untreated injuries and medical problems - Inconsistent or reluctant contact with medical and social care organisations - Accumulation of untaken medication - Uncharacteristic failure to engage in social interaction - Inappropriate or inadequate clothing

SELF NEGLECT - Types of	Possible indicators
- Lack of self-care to an extent that it threatens personal health and safety - Neglecting to care for one's personal hygiene, health or surroundings - Inability to avoid self-harm - Failure to seek help or access services to meet health and social care needs - Inability or unwillingness to manage one's personal affairs	- Very poor personal hygiene - Unkempt appearance - Lack of essential food, clothing or shelter - Malnutrition and/or dehydration - Living in squalid or unsanitary conditions - Neglecting household maintenance - Hoarding - Collecting a large number of animals in inappropriate conditions - Non-compliance with health or care services - Inability or unwillingness to take medication or treat illness or injury

Appendix 2 Role of the DSO Designated Safeguarding Officer

<https://www.highspeedtraining.co.uk/hub/what-is-a-safeguarding-officer>

What does a Safeguarding Officer do?

A Designated Safeguarding Officer or Lead is the person who has responsibility for ensuring a company's safeguarding policy is adhered to. The role isn't essential but, if you work in a place with children or vulnerable adults, it is a good idea to have an officer position to ensure that your safeguarding efforts are as efficient and effective as possible.

Please note: Safeguarding children is everyone's responsibility, regardless of whether you have a Designated Safeguarding Officer or not.

Responsibilities of a Designated Safeguarding Officer

Designated Safeguarding Officers have a number of responsibilities, including:

- Drawing up and enforcing the company's safeguarding policy.
- Being alert to and recognising welfare issues, being sure to challenge poor practice.
- Sharing appropriate information with relevant people.
- Checking the List of Children to see who is subject to a Child Protection Plan.
- Gathering any other relevant information and evidence.
- Consulting local safeguarding children board procedures for additional information and guidance if needed.
- Making referrals to social services when appropriate.
- Continue working with the family, sharing information and contributing to plans if the concern is investigated.
- Ensuring that all staff having contact with children, vulnerable adults and/or their families have received appropriate training on safeguarding issues.
- Being the first point-of-call for all staff who have safeguarding concerns.

This is not an exhaustive list but covers the main responsibilities that may be included in a role description.

The Safeguarding Officer position can be offered to anyone within your organisation; no pre-requisite qualifications are needed.

A good understanding of safeguarding guidance and procedures is beneficial to the role.

Appendix 3 – Internal Safeguarding Record Form



Treasures Foundation is a registered Charity No: 1131292 and a company limited by guarantee in England and Wales, No 6937026 Address:
Treasures Foundation, Crown House, 27 Old Gloucester Street, London. WC1N 3AX
Email: info@treasuresfoundation.org

Safeguarding Record Form

Name of adult:	
Date of birth:	
Address:	

Nature of concern or disclosure: <i>Include the nature of the concern/injury /suspected abuse.</i>

What was said: <i>Where possible, use exact phrases.</i>

Further Info: <i>Add some context to the disclosure or the concerning event, include specific times.</i>

What action have you or anybody else taken? <i>Please also note if no action has yet been taken.</i>

Date concern was raised:	
Today's date:	
Your name:	
Your position:	
Your signature:	
Has the person you are concerned about or who has disclosed information consented to information sharing?	

Appendix 4 Reporting Incidents & Concerns

The following information is from [Safeguarding and protecting people for charities and trustees - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/safeguarding-and-protecting-people-for-charities-and-trustees)

If you have an incident or allegation of abuse you should:

- handle and record it in a secure and responsible way
- follow your protecting people and safeguarding policies and procedures
- act quickly, ensuring you stop or minimise any further harm or damage
- report it to all relevant agencies and regulators in full
- plan what to say to those involved with your charity and the media if appropriate
- be open and transparent so that you build the charity's reputation for acting with integrity
- review what happened to understand how to stop it from happening again

Reporting to the Police

You should report to the police if the incident or concern involves criminal behaviour.

[Guidance on reporting to the police](#) (PDF, 169KB, 2 pages)

Reporting to Newham Council/Social Services

See the file 'Newham blank safeguarding form'

SAFEGUARDING ADULTS CONCERN FORM - Confidential			
Please complete all Questions or note as 'not applicable'			
PLEASE ENTER YOUR DETAILS			
Form Start Date			
Title			
First name		Surname	
Job title		Telephone contact number	
Email address			
PLEASE ENTER THE DETAILS OF THE ADULT AT RISK			
CareFirst ID			
Family name		Given name	

Reporting to the Disclosure and Barring Service

The following information is from [Making barring referrals to the DBS - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs)

Reporting to DBS Legal duty to refer: the two conditions that must be met

If you are a regulated activity provider or fall within the category of personnel supplier, you must make a referral when both of the following conditions have been met:

Condition 1 - you withdraw permission for a person to engage in regulated activity with children. Or you move the person to another area of work that isn't regulated activity.

This includes situations when you would have taken the above action, but the person was re-deployed, resigned, retired, or left. For example, a teacher resigns when an allegation of harm to a student is first made.

Condition 2 - You think the person has carried out 1 of the following:

- engaged in relevant conduct in relation to children and/or adults. An action or inaction has harmed a child or vulnerable adult or put them at risk of harm or;
- satisfied the harm test in relation to children and / or vulnerable adults. eg there has been no relevant conduct but a risk of harm to a child or vulnerable still exists
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence

Reporting to the Charity Commission

[How to report a serious incident in your charity - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity)



CHARITY COMMISSION
FOR ENGLAND AND WALES

Examples table: deciding what to report

Serious incidents to report	Incidents not to report
Protecting people and safeguarding incidents	
A beneficiary or other individual connected with the charity's activities has/alleges to have suffered serious harm	Minor unusual/aggressive behaviour by a beneficiary towards a member of staff
Allegation that a staff member has physically or	Police called to charity premises because a

[RSI guidance what to do if something goes wrong Examples table deciding what to report .pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/what-to-do-if-something-goes-wrong-examples-table-deciding-what-to-report)

Appendix 5 : Safeguarding Duties for Trustees

Extracts from [Safeguarding and protecting people for charities and trustees - GOV.UK](https://www.gov.uk/guidance/safeguarding-and-protecting-people-for-charities-and-trustees)
(www.gov.uk) Please see the full article
From: [The Charity Commission](https://www.gov.uk/guidance/safeguarding-and-protecting-people-for-charities-and-trustees)

Manage the risks

Protecting people and safeguarding responsibilities should be a governance priority for all charities. It is a fundamental part of operating as a charity for the public benefit.

As part of fulfilling your trustee duties, you must take reasonable steps to protect from harm people who come into contact with your charity.

This includes:

- people who benefit from your charity's work
- staff
- volunteers
- other people who come into contact with your charity through its work

The Charity Commission will hold trustees to account if things go wrong and will check that trustees followed this guidance and the law. Trustees are expected to take responsibility for putting things right.

Trustees should promote a fair, open and positive culture and ensure all involved feel able to report concerns, confident that they will be heard and responded to.

We expect all trustees to make sure their charity:

- has appropriate policies and procedures in place, which are followed by all trustees, volunteers and beneficiaries
- checks that people are suitable to act in their roles
- knows how to spot and handle concerns in a full and open manner
- has a clear system of referring or reporting to relevant organisations as soon as concerns are suspected or identified
- sets out risks and how they will be managed in a risk register which is regularly reviewed
- follows statutory guidance, good practice guidance and legislation relevant to their charity: this guidance links to the main sources of information
- is quick to respond to concerns and carry out appropriate investigations
- does not ignore harm or downplay failures
- has a balanced trustee board and does not let one trustee dominate its work – trustees should work together
- makes sure protecting people from harm is central to its culture
- has enough resources, including trained staff/volunteers/trustees for safeguarding and protecting people

- conducts periodic reviews of safeguarding policies, procedures and practice

Read [NCVO's safeguarding resource](#) for advice on how to get started with safeguarding.

Read the [Charity Governance Code](#)

Read [Bond's 'Good governance for safeguarding'](#) for support on developing good practice on governance.

Checking your charity's policies, procedures and practice

Trustees must be assured that all policies, procedures and practice are checked and challenged to ensure they're fit for purpose. You must make sure your charity:

- works within all relevant statutory guidance
- keeps accurate records
- stays aware of current affairs, trends and themes and how these can influence your policies and practices
- complies with its policies and procedures, as well as with good practice and legislation
- updates policies and procedures to reflect changes to statutory requirements, good practice and current issues

Every trustee should have clear oversight of how safeguarding and protecting people from harm are managed within their charity. This means you need to monitor your performance, not just using statistics, but with supporting information, such as qualitative reports. This will help you to understand common themes, identify risks and gaps so you can ensure they are addressed.

Working with or making grants to other organisations

Carry out proper due diligence when you work with, or make grants to, any other bodies, including:

- delivery partners
- trading subsidiaries of the charity, including charity shops
- organisations you fund
- connected charities

You must make sure that any grant recipient or partner body is suitable. They must have appropriate safeguarding procedures in place. Make sure there are clear lines of responsibility and reporting between all bodies involved.

[How to carry out due diligence checks](#)

[Department for International Development's enhanced due diligence: safeguarding for external partners](#)

You should have a written agreement or contract that sets out:

- your relationship
- the role of each organisation.
- monitoring and reporting arrangements

10 Actions trustee boards need to take to ensure good safeguarding governance

Safeguarding should be a key governance priority for all charities

Ensure your charity has an adequate safeguarding policy, code of conduct and any other safeguarding procedures. Regularly review and update the policy and procedures to ensure they are fit for purpose

Identify possible risks, including risks to your beneficiaries or to anyone else connected to your charity and any emerging risks on the horizon

Consider how to improve the safeguarding culture within your charity

Ensure that everyone involved with the charity knows how to recognise, respond to, report and record a safeguarding concern

Ensure people know how to raise a safeguarding concern

Regularly evaluate any safeguarding training provided, ensuring it is current and relevant

Review which posts within the charity can and must have a DBS check from the Disclosure and Barring Service

Have a risk assessment process in place for posts which do not qualify for a DBS check, but which still have contact with children or adults at risk

Periodically review your safeguarding policy and procedures, learning from any serious incident or 'near miss'

If you work overseas, find out what different checks and due diligence you need to carry out in different geographical areas of operation.

Further Information / Whistleblowing

[Guidance on handling safeguarding allegations in a charity | Office for Civil Society \(culture.gov.uk\)](https://www.culture.gov.uk/whistleblowing)

Appendix 6 : Other Useful Contact Details

Service	Phone number	Address	Opening Times
Newham Council Access to Children Social Care Team SAFEGUARDING	02033734600 (9am-5pm) 02084302000 (out of hours)		
Childline	0800 1111		
NSPCC	0800 800 5000		
Newham Council General & Social Care Out of Hours Support	0208 430 2000		
GP – East End Medical Centre	020 8470 8186	61 Plashet Road Plaistow London E13 0QA	Monday – Friday 8am – 6.30pm For appointments during weekends and when the surgery is closed, please call 0207 540 9949. You will not be seen at the surgery but at various hubs in Newham by a GP
GP Claremont Clinic	020 8522 0222	459 - 463 Romford Road Forest Gate London E7 8AB	Monday – Friday 8am – 6.30pm
UK Anti-Terrorism Hotline	0800 789 321		
Action Fraud (Fraud & Cyber Crime)	0300 123 2040	www.actionfraud.police.uk/reporting-fraud-and-cyber-crime	Phone: Monday-Friday 8am-8pm Online 24/7

Appendix 7: Read and understood template



Treasures Foundation is a registered Charity No: 1131292 and a company limited by guarantee in England and Wales, No 6937026, Address: Treasures Foundation, Crown House, 27 Old Gloucester Street, London. WC1N 3AX, Email: info@treasuresfoundation.org

I,, agree with the following statements:

I have read and understood Treasures Foundation Safeguarding Policy.

I understand that managing safeguarding concerns, responding and reporting Safeguarding is everyone's responsibility.

Signature

.....

Date

.....

Risk Assessment: Children Staying Overnight in Supported Housing

1. Service Details

Service Name:

Address:

Provider:

Type of Service:

Current Staffing Model:

Assessment Completed By:

Date:

Review Date:

2. Details of Children Staying Overnight

Ages of children:

Frequency of overnight stays:

Maximum number of children:

Are placements approved by Social Services? (Yes/No):

Written confirmation received? (Yes/No):

Any additional needs or vulnerabilities:

3. Legal and Safeguarding Context

This service recognises its duty of care under the Children Act 1989 and safeguarding responsibilities when children stay overnight.

Safeguarding policy in place: Yes/No

Staff safeguarding training up to date: Yes/No

4. Identified Risks and Control Measures

Emergency situations (fire, medical emergency):

Likelihood:

Impact:

Controls in place:

Safeguarding concerns:

Likelihood:

Impact:

Controls in place:

Environmental risks:

Likelihood:

Impact:

Controls in place:

5. Staffing and Supervision Arrangements

Is there on-site staff overnight? Yes/No

If no, on-call arrangements and response times:

Lone working risks and mitigation:

Staff training adequacy:

6. Parental Responsibility

Parents retain primary responsibility for their children overnight.

Parents provided with written expectations and emergency procedures: Yes/No

7. Overall Risk Rating

Overall risk level: Low / Medium / High

Is the risk acceptable with current controls? Yes/No

8. Decision and Actions

Decision regarding overnight staffing:

Actions required to reduce risk:

Timescales:

Responsible person:

9. Sign-off

Service Manager:

Safeguarding Lead:

Date: