

# Safeguarding Policy

## Babies, Children, Young People and Adults

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|-------------------------|---------------------------------------------------|
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*\*NB. This Policy applies across all Spurgeons, & Dad.info branded services\**

## Contents

|      |                                                                         |    |
|------|-------------------------------------------------------------------------|----|
| 1.0  | Introduction .....                                                      | 4  |
| 2.0  | Who This Policy Applies To.....                                         | 4  |
| 3.0  | Health or Development/Significant Harm .....                            | 5  |
| 4.0  | Types of Abuse and Neglect .....                                        | 5  |
| 5.0  | Specific Safeguarding Issues .....                                      | 7  |
| 6.0  | Safeguarding Roles and Responsibilities .....                           | 8  |
| 7.0  | Safer Recruitment .....                                                 | 14 |
| 8.0  | Child Safeguarding Practice/Child Death/Domestic Homicide Reviews ..... | 14 |
| 9.0  | Allegations against member of the workforce .....                       | 16 |
| 10.0 | Audit and Review of the Policy.....                                     | 17 |

## Safeguarding Statement

Our vision is to transform the nation, one child at a time by ensuring every family has the support needed to flourish. To make that a reality, remaining child and person-centred and ensuring those we work with, and encounter are safeguarded, and their welfare promoted is the **number 1 priority** for all colleagues within Spurgeons.<sup>1</sup>

Whilst neglect and the physical, emotional and sexual abuse of children by adults is not new, we recognise from our service provision the broader and additional ways in which children can be at risk of maltreatment and impaired health or development, and require professional intervention to protect them from harm and support them, for example: *Sexual exploitation, impact of domestic abuse, impact of parental mental and physical health (including substance misuse), impact of parental imprisonment, risks with social networking (including through gaming, sexting), isolation/loneliness/self-harm, high 'screen-time'/sleep deprivation, age/development inappropriate activity (including online media content).*

The Safeguarding Policy sets out our overall position while the Child Protection Procedures and Appendices then set out its practical application and guide the workforce on the actions they must take in particular situations. Each takes into account the government guidance [Working Together to Safeguard Children 2026](#) and [Children's Social Care National Framework: Statutory Guidance on the purpose, principles for practice and expected outcomes of children's social care 2026](#) The [Social Services and Well-being \(Wales\) Act 2014](#), [Working Together to Safeguard People 2022](#) and [Keeping learners safe 2022](#) in relation to the nature and context of our service delivery.

Our organisational system of safeguarding comprises of more than policy and procedure. Safer recruitment, our code of conduct, induction process, supervision and training are integral to ensuring the workforce are suitable and have essential safeguarding knowledge and skills. The workforce has access to off-line and on-call specialist support and advice about safeguarding. Decision-making is monitored case-by-case, with corporate performance scrutinised at Board level each quarter to ensure joined up working across departments / functions, to hold those responsible for performing and controlling safeguarding work accountable, to maintain a reflective approach, ensure continuous improvement and appropriate internal communication.

Given the emphasis we place on the importance of safeguarding alongside all other business critical activities Spurgeons will ensure that robust arrangements and sufficient resources are available to enable the policy and procedures to be implemented throughout the organisation in a timely way to prioritise children's safety, and legal compliance - in keeping with our core values.

The Safeguarding Policy must be read and fully understood by all members of the workforce on appointment or engagement and **always** prior to undertaking direct work with babies, children, young people, and families, and together we operate a safeguarding aware culture: **Respect and know your limits** – both of your ability to deal most appropriately with a situation and of your level of responsibility **If in doubt, you must ask**. We will consult with workforce representatives over changes to Safeguarding Policy and procedure for the protection of babies, children, young people and adults to achieve appropriate workforce involvement. Both will be reviewed annually and updated, as necessary.

**Lorraine White (Director of Services and Practice)**

<sup>1</sup> Throughout the statement, policy and procedures "workforce" refers to: volunteers, casual, agency, temporary and permanent staff.

## 1.0 Introduction

This policy framework sets out: who it applies to, outlines the relevance of 'health or development' and 'significant harm', provides definitions of the main types of abuse and neglect, lists other specific safeguarding issues, details the safeguarding responsibilities of everyone and those in specific roles, states our position on Child Safeguarding Practice Reviews, Child Death Reviews, Unified Safeguarding Review (SUSR), and allegations against members of the workforce, and confirms its audit and review arrangements.

The legal basis for responding to concerns regarding safeguarding of vulnerable adults is different from that of babies, children and young people under 18. Spurgeons will bring to the attention of statutory agencies (the local authority and the police) any concerns in relation to safeguarding adults at risk identified through any part of its work.

Spurgeons makes a positive contribution towards creating and maintaining strong and safe families and communities and recognises the right of every individual to stay safe. Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and young people wherever possible. Child protection is about responding to specific circumstances that arise.

In order to fulfil our responsibilities effectively Spurgeons works in accordance with the principles as set out in in [Working Together to Safeguard Children 2026](#), [Children's Social Care National Framework: Statutory Guidance on the purpose, principles for practice and expected outcomes of children's social care 2026](#) and Section 10 and Section 11 of the Children Act 2004. Children and Families Act 2014, Care Act 2014 Children and Social Work Act 2017, Data Protection Act 2018, Domestic Abuse Act 2021, Statutory guidance July 2022 Statutory Framework for the Early Years Foundation Stage 2025, [Keeping Children Safe in Education 2025](#) [Care and Support statutory guidance July 2025](#). The [Social Services and Well-being \(Wales\) Act 2014](#), [Working Together to Safeguard People 2022](#) and [Keeping learners safe 2022](#)

This policy will be reviewed and updated as service delivery, through contracted, funded and discretionary work changes year-to-year in order to always reflect current activities and circumstances, thereby maintaining the relevance of the policy as an aid to appropriate and effective safeguarding practice for all service users and beneficiaries.

## 2.0 Who This Policy Applies To

Definition of a child: this policy applies to unborn children, all children, and young people up to the age of 18 years of age (as defined in the United Nations convention on the Rights of a Child), however our policies and procedures also support working with adults who are vulnerable. No child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs. All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality, or beliefs.

Children may be service users in their own right or children cared for by adults who are receiving services via Spurgeons. It also covers other children in the wider community that come to the attention of staff in the

course of their work e.g., children associated with a family group or connected in any way with a child or adult engaged with a Spurgeons' service provision.

Definition of an adult who is vulnerable: Anyone 18 or over with care and support need who is at risk of experiencing, abuse neglect (either from another person or from their own behaviour)

### 3.0 Health or Development/Significant Harm

All members of our children's workforce must be aware of local early help processes and understand their role in identifying emerging problems for babies, children, young people, adults who are at risk and families, and share information with relevant professionals to support early identification and support.

They must be aware of the local process for making referrals to children's social care for statutory assessments under the Children Act 1989 that may follow, along with the role they might be expected to play in such assessments or in ensuring protection for a child at risk.

Under the Children Act 1989, the welfare of the child is paramount and local authorities are required to provide services for children in need within their area for the purposes of safeguarding and promoting their welfare. Local authorities undertake assessments of the needs of individual children to determine which services to provide and what action to take. This can include:

*Section 17-* A child in need is defined under section 17(10) of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of **health or development**, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

*Section 47-* If the local authority has reasonable cause to suspect that a child is suffering, or likely to suffer, **significant harm** they have a duty to make enquiries under section 47 to enable them to decide whether they should take any action to safeguard and promote the child's welfare. This duty also applies if a child is subject to an emergency protection order (under section 44 of the Children Act 1989) or in police protective custody under section 46 of the Children Act 1989.

Where a member of the workforce believes that a baby, child or young person is suffering, or likely to be suffering, significant harm, they **must** act in line with the Procedure for the protection of babies, children, young people and adults at risk A complete list of relevant legislation is provided within the Procedure for the protection of babies, children, young people and adults at risk appendices.

### 4.0 Types of Abuse and Neglect

Abuse, neglect, and safeguarding concerns are described by, but not limited to, the following definitions and in some instances multiple concerns will exist.

**Abuse:** A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects.

Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

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

Spurgeons does not support **smacking**, albeit within England that parents / those in 'loco parentis' are currently allowed to use 'reasonable chastisement' (mild forms of physical punishment) when disciplining their children. There are positive ways to discipline children that are more effective. In Wales, all forms of physical punishment of children, including smacking, are illegal under the Children (Abolition of Defence of Reasonable Punishment) (Wales) Act 2020. Practitioners must treat any instance, disclosure, or concern relating to physical punishment as a safeguarding matter and follow organisational procedure for the protection of babies, children, young people and adults at risk. The previous defence of 'reasonable punishment' no longer applies, and children now have the same legal protection from assault as adults.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it can occur alone.

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

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

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger.

- ensure adequate supervision (including the use of inadequate caregivers).
- ensure access to appropriate medical care or treatment.
- provide suitable education.

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

## 5.0 Specific Safeguarding Issues

There is now better understanding in the UK – from experience, research, and experts – about the broader and additional ways in which children can be at risk of maltreatment and impaired health or development and require professional intervention to protect them from harm and support them. Government safeguarding guidance exists and can be accessed via the [www.gov.uk](http://www.gov.uk) website:

### **Domestic abuse:**

Domestic abuse: the Domestic Abuse Act 2021 definition is when both the perpetrator and victim are each aged 16yr or over, are personally connected to each other, and the abusive behaviour consists of any of the following: physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse or psychological, emotional or other abuse, regardless of whether the behaviour consists of a single incident or a course of conduct.

Spurgeons recognises anyone can be amongst those affected by domestic abuse as:

- a survivor of domestic abuse.
- an individual living with domestic abuse.
- impacted upon by domestic abuse.
- a perpetrator of domestic abuse.

Spurgeons are committed to ensuring anyone of the who is experiencing domestic abuse, has the right to raise the issue with us in the knowledge that they will receive non-judgemental assistance.

Spurgeons understands the nature and risks associated within the complexities of domestic abuse and the impact it can have on the individual and their family. Domestic abuse can have a devastating impact on children when exposed to it. Under the statutory definition of domestic abuse, a child who sees, hears, or experiences the effects of domestic abuse, and who is related to the person being abused or the perpetrator, is also to be regarded as a victim of domestic abuse. (Domestic Abuse Act 2021)

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as teenage relationship abuse. Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

### **Extra-familial contexts**

Extra-familial contexts include a range of environments outside the family home in which harm can occur. These can include peer groups, school, and community/public spaces, including known places in the community where there are concerns about risks to children (for example, parks, housing estates, shopping centres, takeaway restaurants, or transport hubs), as well as online, including social media or gaming platforms.

### Extra-familial harm

Children may be at risk of or experiencing physical, sexual, or emotional abuse and exploitation in contexts outside their families or the home they live in, such as a children's home or foster home. While there is no legal definition for the term extra-familial harm, it is widely used to describe different forms of harm that occur outside the home. Children can be vulnerable to multiple forms of extra-familial harm from both adults and/or other children and harm may be perpetrated or facilitated by individuals or groups. Examples of extra-familial harm may include (but are not limited to): criminal exploitation (such as county lines and financial exploitation), serious violence, modern slavery and human trafficking, online harm, sexual exploitation (including group-based child sexual exploitation), child-on-child (non-familial) sexual abuse and other forms of harmful behaviour displayed by children towards their peers, abuse, and/or coercive control, children may experience in their own intimate relationships (sometimes called teenage relationship abuse), and the influences of extremism which could lead to radicalisation.

### Preventing radicalisation

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

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

## 6.0 Safeguarding Roles and Responsibilities

All members of the workforce, regardless of role, are expected to undertake their work in a way that upholds the part we play as a voluntary sector provider in keeping children safe.

### England

"3.54 Voluntary, charity, social enterprise (VCSE) and private sector organisations and agencies play an important role in safeguarding children through the services they deliver. Some of these will work with particular communities, with different races and faith communities, and deliver via health, adult social care, housing, and Prison and Probation Services. They may, as part of their work, provide a wide range of activities for children and have an important role in safeguarding children and supporting families and communities.

3.55 Like other organisations and agencies who work with children, they should have appropriate arrangements in place to safeguard and protect children from harm. Many of these organisations and agencies as well as many schools, children's centres, early years, and childcare organisations, will be subject to charity law and regulated either by the Charity Commission and/or other "principal" regulators.



Charity trustees are responsible for ensuring that those benefiting from, or working with, their charity, are not harmed in any way through contact with it. The Charity Commission for England and Wales provides guidance on charity compliance which should be followed.

3.57 All practitioners working in these organisations and agencies who are working with children and their families are subject to the same safeguarding responsibilities, whether paid or a volunteer

358. Every VCSE, faith-based organisation and private sector organisation or agency should have policies in place to safeguard and protect children from harm. These should be followed, and systems should be in place to ensure compliance in this. Individual practitioners, whether paid or volunteer, should be aware of their responsibilities for safeguarding and protecting children from harm, how they should respond to child protection concerns and how to make a referral to local authority children's social care or the police, if necessary." ([Working Together to Safeguard Children 2026](#), p136)

## **Wales**

This Code of Safeguarding Practice sets out Welsh Government expectations in relation to safeguarding arrangements. Safeguarding is everybody's responsibility. The Welsh Government expects individuals, groups and organisations offering activities or service to follow this advice. This will demonstrate reasonable steps are being taken to ensure the safety of children and adults at risk. [Working together to safeguard people: national action plan on preventing and responding to child sexual abuse. Working Together to Safeguard People 2022](#)

## **All Members of the Workforce**

Everyone has a role to play in fostering a positive attitude to create a culture of safeguarding babies, children, young people and adults at risk. This policy is designed to support everyone in fulfilling their duties and to ensure all line managers take responsibility for the actions of their local workforce. Failure to respond to, or report concerns regarding the safety or welfare of children and young people could result in disciplinary action.

All members of the workforce are responsible for ensuring that they have read and understood this policy and the accompanying procedure and what their role specific responsibilities are, and to comply with both. Everyone shares the responsibility to respond to concerns regarding the safety or welfare of a baby, child, young person and adult at risk. However, it is not the responsibility of anyone within Spurgeons to investigate concerns, but to take action regarding their concerns and ensure statutory agencies fulfil their responsibilities.

Everyone has a responsibility to act on, and inform their immediate line manager about, any safeguarding or child protection concerns – which can and do arrive through very different routes (e.g., calls to reception, complaint e-mails, fundraising correspondence, and in-person disclosures). For that reason, all Spurgeons services and sites must have a nominated Designated Safeguarding Lead (DSL) who will support staff with handling safeguarding concerns; accordingly, everyone must be aware who their DSL is. The DSL may be an experienced staff member, senior worker, or manager who is suitably trained. If the DSL is needed but unavailable the matter must be escalated through the management line and if necessary, the on-call manager contacted. For Central Teams the DSL is Head of Practice Development. All members of the workforce must ensure relevant statutory regulations and codes of practice are adhered to.

A complete list of all associated Spurgeons' policies and procedures which promote children's safety and welfare is provided within the Procedure for the protection of babies, children, young people and adults at risk appendices on the [intranet](#).

### **Trustees**

The Board of Trustees is responsible for ensuring Spurgeons compliance with Charity Commission guidance ([Safeguarding and protecting people for charities and trustees, updated 2022 and Charity Code of Governance 2025](#)) for ensuring relevant safeguarding and child protection legislation and guidance is followed and that there is an up to date Safeguarding Policy and Procedure for the protection of babies, children, young people and adults at risk in place. Albeit the associated work is discharged by the executive and wider workforce, Trustees actively monitor safeguarding performance through the Standards and Outcomes Committee of the Board.

### **Chief Executive Officer (CEO)**

- Spurgeons Safeguarding Policy and Procedure for the protection of babies, children, young people and adults at risk are consistently applied throughout the organisation.
- Trustees are advised of resource issues which may impact on compliance with Safeguarding Policy and Procedure for the protection of babies, children, young people and adults at risk compliance within Spurgeons.
- Safeguarding and protection of babies, children, young people and adults at risk are given equal importance to other business critical issues and funding of improvements is approved where practicable.
- A named senior manager provides strategic leadership on safeguarding and protection of babies, children, young people and adults at risk and for ensuring sound day to day management of safeguarding across the organisation.

### **Named senior manager Director of Services and Practice**

- Competent safeguarding and protection of babies, children, young people and adults at risk support and advice are readily available to the workforce to enable compliance with the policy and procedures.
- The promotion of learning and improvements in safeguarding and protection of babies, children, young people and adults at risk and bringing to CEO / trustees attention any relevant new or changed legislation.
- That the Safeguarding Policy and Procedure for the protection of babies, children, young people and adults at risk are available to the entire workforce.
- Sufficient and appropriate supervision and training, including refresher training, to ensure competence through the level of workforce knowledge and skills.
- Ensuring digital/hybrid services comply with our policies and procedures and with the UK Digital Resilience Framework
- Attend safeguarding training and ensuring that this knowledge is refreshed and kept up to date.
- That the handling of safeguarding (including allegations against the workforce) is prompt and in accordance with local Safeguarding Partner Arrangements.
- Reporting organisational safeguarding updates and themes to Board of Trustees
- Accountable for safeguarding and services on organisational risk register including reporting risk management to Board of Trustees

### **Head of Practice Development**

- Chairing Safeguarding Panel, mandated to oversee the development of a safe organisation with

good quality child-focused services.

- Attending safeguarding training and ensuring that this knowledge is refreshed and kept up to date.
- Reporting safeguarding themes to trustees to Standards and Outcomes Committee
- Provides leadership and management within the practice review and development related to safeguarding including writing and reviewing Procedure for the protection of babies, children, young people and adults at risk and quality assurance.
- Provide a responsive and collaborative approach to practice development specifically in relation to safeguarding with managers and teams to ensure the very best outcomes for babies, children, young people, and their families.
- Ensure the Practice Handbook, Knowledge Hub and any other relevant policies or guidance are updated with up-to-date safeguarding policy and practice legislation, guidance and support.
- The named Caldicott Guardian for the organisation
- Designated Safeguarding Lead for Central services.
- Strategic Lead for Communities of Practice.

#### **Quality and Practice Lead (Domestic Abuse Specialism)**

- Provides leadership and practice review and development related to subject matter i.e., Domestic Abuse specialist safeguarding including writing and reviewing policies, procedures, and quality assurance.
- Provide a responsive and collaborative approach to practice development specifically in relation to subject matter working with managers and teams to ensure the very best outcomes for babies, children, young people, and their families.
- To enhance and strengthen colleagues to work to high quality standards in their practice around specialist area.
- Attending safeguarding training and ensuring that this knowledge is refreshed and kept up to date.
- Strategic Lead for Communities of Practice of Domestic Abuse

#### **All Directors and/or Heads of Central Teams**

- The direction of safeguarding and protection of babies, children, young people and adults at risk management in their departments and that the workforce understands the policy and procedure.
- The implementation of the policy and procedures within their areas of responsibility and liaising with the Director of Services and Practice or CEO about concerns over, or changes required, with either.
- Attend all Safeguarding Panels, if unable to attend to nominate a member of their team to attend.
- Through recruitment, induction, supervision, training, that all managers have sufficient experience, knowledge / skills to lead teams in fulfilling their responsibilities.
- Through central reporting systems and reports generated, monitor, and ensure compliance in the day-to-day handling of safeguarding / protection of babies, children, young people and adults at risk concerns.
- Through sampling of safeguarding undertaken in their departments, ensure work is compliant, corrective action taken if necessary and learning / good practice shared.

In addition, these responsibilities also fall to Directors or Heads by role:

#### **Head of People**

- The authority on safeguarding for staff and volunteer vetting, pre- employment checks and

legislative compliance over the employment / engagement of ex-offenders.

- Leading on Safer Recruitment and ensuring that there is someone on appointment panels for staff / volunteers working with children / young people who have successfully completed safer recruitment training.
- Ensuring all members of the workforce directly working with children and families are checked by the Disclosure & Barring Service (DBS) at an enhanced level before undertaking direct work and managing the positive DBS risk assessment process.
- Advise and support on due diligence and vetting for external stakeholders and partners.
- The Head of People is the Responsible Officer for the maintenance and day-to-day operation of the Whistleblowing Policy, and one of the points of contact options. See [Whistleblowing Policy \(2022\)](#).

#### **Director of Digital Family Hubs**

- Ensure the role and responsibilities of Head of Service and Service Manager are fulfilled directly or by appropriate delegation for Digital Family Hubs services.
- Designated Safeguarding Lead for Dad. Info and the Digital Family Hub and Family Support team
- Attending safeguarding training and ensuring that this knowledge is refreshed and kept up to date.
- Responsible for ensuring adequate DSL cover for Digital Family Hub services
- All digital products and content developed by the Digital Family Hub are in line with our own safeguarding policy and procedure for the protection of babies, children, young people and adults at risk, as well as the [Charity Commission Safeguarding Strategy](#) and [Digital Resilience Framework - GOV.UK](#)
- The implementation of the policy and procedures within their areas of responsibility and liaising with the Director of Services and Practice or CEO about concerns over, or changes required, with either.

#### **Director of Fundraising and Engagement**

- Ensure our Fundraising activities link with our own safeguarding policy and procedure for the protection of babies, children, young people and adults at risk, as well as the [Code of Fundraising Practice](#)
- The direction of safeguarding and protection of babies, children, young people and adults at risk management in their departments and that the workforce understands the policy and procedure.
- The implementation of the policy and procedures within their areas of responsibility and liaising with the Director of Services and Practice or CEO about concerns over, or changes required, with either.
- All digital content is in line with our own safeguarding policy and Procedure for the protection of babies, children, young people and adults at risk, as well as the Charity Commission Safeguarding Strategy and UK resilience framework.

#### **Director of Advocacy and Mobilisation**

- The direction of safeguarding and protection of babies, children, young people and adults at risk management in their departments and that the workforce understands the policy and procedure.
- The implementation of the policy and procedures within their areas of responsibility and liaising with the Director of Services and Practice or CEO about concerns over, or changes required, with either.

#### **Head of Data, Insight and Evidence**

- Ensuring robust data collection of safeguarding incidents to gain insight into the effectiveness of

Spurgeons safeguarding.

- Provide Power Bi reports on safeguarding trackers to all Heads of Service and Service Managers
- Provide specialist data analysis of safeguarding themes.

### **Head of Corporate Services**

- Work with Head of People and Director of Services & Practice on due diligence and vetting for external stakeholders and partners.

### **Head of IT**

- Ensuring the appropriate and safe use of Artificial Intelligence (AI) technology
- Provide guidance on all matters related to data protection e.g., GDPR.
- Audit and review data in monitoring tools and report back any areas of concern.
- Manage the security and control access to sensitive data and IT applications.

### **Heads of Service**

- The Heads of Service are responsible for ensuring adequate DSL cover locally and/or providing it themselves when necessary.
- Provide a Head of Service quarterly report across their portfolio to Safeguarding Panel
- Attend all Safeguarding Panels, if unable to attend to nominate a member of their team to attend.
- Accountable for ensuring safeguarding audits are completed within services (under their line management), flagging significant issues or concerns to the Head of Practice Development.
- Are responsible for producing a report that collates information from all audits in their portfolio, drawing out examples of good practice, identifying themes and any issues that need addressing at an organisational level.
- Attending safeguarding training and ensuring that this knowledge is refreshed and kept up to date.
- That they seek advice and guidance on matters beyond their experience, knowledge or confidence (e.g., complex cases) from Head of Practice Development, Domestic Abuse Lead and Director of Services and Practice.

### **Service Managers**

Each service/site must have a Designated Safeguarding Lead (DSL) who oversees the handling of safeguarding and protection of babies, children, young people and adults at risk concerns, provides advice and guidance on making referrals to other agencies, and holds knowledge about the local children's social care referral process and support services available. The DSL is responsible for ensuring:

- That the local workforce has access to their contact details, those of other managers within the reporting line, and those providing national on call (out of hours/weekend).
- That the local workforce is confident and competent in their knowledge of safeguarding and protection of babies, children, young people and adults at risk including practice reporting and escalating concerns.
- Attending safeguarding training and ensuring that this knowledge is refreshed and kept up to date.
- Ensure Spurgeons Safeguarding Tracker is completed (protection of babies, children, young people and adults at risk procedure)
- That staff have adequate resources / support to comply with procedures and escalate to their manager concerns about resources or staffing impacting on safe practice.
- That the Safeguarding Policy and protection of babies, children, young people and adults at risk

procedure

- are available to the entire local workforce, including those who do not have ready access to a computer.
- That every Spurgeons workplace has a safeguarding notice board clearly displaying as a minimum the safeguarding flowchart, 'What to do if you're worried a child is being abused' advice for practitioners, Top Ten MUST dos, and the list of local safeguarding personnel.
- That children, young people and parents are informed in an age and developmentally appropriate way of the existence of this policy and our protection of babies, children, young people and adults at risk procedure.
- Quarterly monitoring and analysis of safeguarding themes across their services using the quality assurance monitoring form.
- Responsible for completing the audit and substantiating the evidence for the audit and for their service/s and for ensuring that actions identified in the action plan are addressed within the timeframe. The audit should be undertaken as a team exercise and 'owned' by the team.
- That they seek advice and guidance on matters beyond their experience, knowledge or confidence (e.g., complex cases) from Heads of Service/ Head of Practice Development or Quality and Practice Lead (Domestic Abuse Specialism).
- Attend safeguarding panels as and when required.

## 7.0 Safer Recruitment

Spurgeons carries out safer recruitment checks on everyone who works for us. All roles at Spurgeons require a Disclosure and Barring Service (DBS) check and references before the individual joins us and begins any work. See Safer Recruitment Policy (2025).

## 8.0 Child Safeguarding Practice/Child Death/ or Domestic Abuse Related Deaths / Domestic Abuse Related Death Reviews/ Unified Safeguarding Review

Given the nature and level of services Spurgeons provides, we will, at times, have current or historic involvement with cases that become subject to statutory reviews. In England, these may include Child Safeguarding Practice Reviews, Child Death Reviews, or Domestic Abuse Related Deaths / Domestic Abuse Related Death Reviews (DARDRs) led by Local Safeguarding Partner arrangements, Safeguarding Adults Boards, Child Death Review partners, or DARDR teams. In Wales, the Single Unified Safeguarding Review (SUSR) statutory guidance (August 2025) sets out the process for undertaking a statutory review, including cases involving a child's death where abuse, neglect or safeguarding concerns are suspected. As well as being held to account through these processes, Spurgeons is committed to learning and improving alongside all professionals in the sector.

All statutory information requests, correspondence and communication from those bodies over these matters (including at the earliest point when information is being gathered in order to arrive at the decision to progress) should be addressed to the CEO or Director of Services and Practice if notified through another route **must** be brought to their attention the **same day**. The Director of Services and Practice or CEO will then decide on how communication is handled, take steps to ensure the relevant hard copy and electronic records are secured, ensure local staff are supported, and commission any Internal or Individual Management Review (or equivalent) then required.

Harm to the charity's work, beneficiaries or reputation is deemed a 'serious incident' as defined by the



Charity Commission. Whenever the charity's work has become subject to independent scrutiny (as part of a statutory review processes) the senior leadership team will assess an analysis of any shortcomings and learning from the case and agree actions necessary to remedy them are being taken and bring both to the attention of Trustees.

Cases that become subject to review which involve the voluntary sector frequently fall into the category of being highly complex, often with long-standing problems where multiple agencies are providing services to a family. The key issues for voluntary agencies in past serious case reviews nationally mainly relate to adult focused services, a lack of clarity around referral criteria, confusion around different agency involvement, and wrongly prioritising good relationships with adult clients over the safety and welfare of children.

Based on our own experience and learning as well as from the expertise and the most recent national overview of child safeguarding practice reviews involving voluntary and community sector organisations that the NSPCC (National Society for the Prevention of Cruelty to Children) undertook in October 2024, the following are relevant **key learning for improved practice points**:

- i. Develop strong policies and procedures and provide effective training** - Clear child protection and safeguarding policies and procedures support staff and volunteers to carry out their roles in a safe and appropriate way and respond effectively to any concerns.
  - Voluntary agencies should ensure they have strong child protection and safeguarding policies and procedures and that all staff and volunteers understand how to follow them.
  - Voluntary agencies should share safeguarding policies and procedures with children and families using their services. Parents and caregivers should be made aware of the voluntary agency's responsibility to report concerns to statutory agencies.
  - All staff and volunteers should receive safeguarding and child protection training, including understanding any specific risks that are related to the work they undertake and the people they work with.
  - There should be clear procedures in place for escalating concerns. Staff should be given the training and support needed to confidently raise any concerns they might have had about the direction and overall management of children's cases with other agencies.
- ii. Working with other agencies** - Good inter-agency working is central to effective child protection and safeguarding practice. It's important that safeguarding roles and responsibilities are clearly identified and defined when different agencies work together. Voluntary agencies should feel confident reporting concerns about case management to other agencies involved in child protection cases; including following up referrals if it seems that no action has been taken.
  - A full assessment of risk, harm and need should take place before referring a family for voluntary support, and consideration made about whether statutory support would be more appropriate.
  - The voluntary sector should be part of safeguarding partnership arrangements.
  - All agencies working with a family should have direct communication with each other. Voluntary organisations should pro-actively engage with local safeguarding agencies and other organisations involved in child protection.
  - It's helpful to assign a lead professional to coordinate work with a family and ensure everyone's roles and responsibilities are clearly defined and kept to. Voluntary agencies should follow up on any child protection referrals they make if it

seems that no action has been taken or if risk to the child is not being managed.

- Children's social care should maintain a list of voluntary agencies who are working directly and regularly with looked after children. These agencies should be called on to provide a report for the looked after child review and be sent a copy of the child's updated care plan after each review.

**iii. Record keeping and information sharing-** Sharing accurate and up to date information helps everyone keep children safe.

- Voluntary agencies should gather, record and share information about any safeguarding concerns.
- Voluntary agencies should routinely request information regarding the history of families and previous and current agency involvement when accepting referrals for support from statutory agencies.
- Voluntary organisations should inform the referring agency if a child or family is not engaging with the support they offer.
- Voluntary agencies' case records should include reasons for any gaps in service provision.
- Voluntary agencies providing services to adults who are parents must consider the impact of the parents' problems on their ability to care for and safeguard their children and share any concerns with relevant agencies.

**iv. Sharing expertise-** Other agencies can benefit from drawing on the trusting relationships and specialist knowledge held by voluntary agencies.

- Voluntary organisations have a vital role in developing local networks of support. This is particularly important for families experiencing social isolation or who are from marginalised communities.
- Other agencies should draw on existing, positive relationships built up between voluntary agencies and individual children and families to help encourage greater engagement with available support services.

## 9.0 Allegations against a member of the workforce

Given the scale of the workforce, and what is known from experience and research, we may receive allegations of abuse against present or past members of the workforce (in relation to current or non-recent abuse). In the event that we do, we will ensure that any concerns raised, and allegations made are taken seriously. In the course of following the detailed procedures on the subject the Head of People and the Director Services and Practice/ Head of Practice Development (must be notified on the same day and will then take charge of the matter including making or ensuring a referral to the independent Local Authority Designated Officer or team of officers, is made when the threshold is met. Notwithstanding our duty of care to employees and volunteers, our priority is to deal with allegations quickly in a fair and consistent way that first provides effective protection for children whilst at the same time separately supporting the person subject to the allegation. A beneficiary alleging to have suffered serious harm or an allegation that a member of the workforce has assaulted or neglected a beneficiary whilst under the charity's care is deemed a reportable 'serious incident' by the Charity Commission.

## 10.Serious Incidents

The Charity Commission requires Spurgeons to report any serious incidents. If such an incident occurs, it is vital to provide prompt, full, and transparent disclosure to the Commission. Spurgeons has a responsibility to report what happened and, importantly, explain how the situation is being managed,



even if it has also been reported to the police, donors, or another regulator.

For detailed guidance on responding to serious incidents, please refer to the [Critical/Serious Incident Response Policy](#)

## **11 Audit and Review of the Policy**

Each quarter of the year services will be audited on compliance with this Safeguarding Policy and the protection of babies, children, young people and adults at risk procedure with the results reported to via the safeguarding risk register , and monitored by, the Safeguarding Panel. That will primarily be a self-audit against the safeguarding risk register with checking and remedial action undertaken by, or under the supervision of, second line managers but may also include direct intervention from the Head of Practice Development and Practice and Quality Lead (Domestic Abuse Specialism)- who undertake a thematic analysis, reporting and implementation of organisational learning.

We will consult with the workforce representative members of the Safeguarding Panel over significant changes to the Safeguarding Policy and the protection of babies, children, young people and adults at risk procedure to ensure appropriate workforce involvement. Both will be reviewed and refreshed annually and updated more frequently if necessary.

