HOXTON TRUST SAFEGUARDING POLICY

INTRODUCTION

POLICY STATEMENT

We are committed to protecting all children and vulnerable adults against all forms of abuse and we expect everyone who works in our organisation to share this commitment. This policy is backed by legislation.

This policy sets out how the organisation will manage recruitment for job roles that involve working with vulnerable groups and how it will manage matters arising during employment where it is believed that vulnerable groups could be, or have been, placed at risk. The policy also explains the responsibilities of staff in relation to the safeguarding of vulnerable groups and the procedure that should be followed when reporting an allegation of abuse.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

WHO IS COVERED BY THIS POLICY?

This policy applies to those working at all levels and grades, including part-time and fixed-term employees and volunteers (collectively referred to as staff in this policy). The policy specifically covers all who work in a regulated activity with children and/or adults, and this policy defines a child as anyone under the age of 18 years as defined by the Children Act of 1989 and 2004. A 'vulnerable adult' is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or being exploited.

PERSONNEL RESPONSIBLE FOR IMPLEMENTATION OF THIS POLICY

The Executive Director, Paul Fleming (paul@hoxtontrust.org, 020 7729 1480) has overall responsibility for the operation of this policy. He will ensure that adequate resources are available for the effective implementation of this policy. It is the responsibility of everyone working for or on behalf of the organisation to report any allegations of abuse. Any safeguarding concerns should be reported to the Executive Director or a Trustee.

RECRUITMENT

We will make it clear to candidates when advertising a job role if the work involved is regarded as a regulated activity (work that involves unsupervised contact with children or vulnerable adults) and will determine this in accordance with the provisions of the Safeguarding Vulnerable Groups Act 2006.

Before we can employ a candidate in a regulated activity, we will require the candidate to provide a satisfactory Enhanced Disclosure with a relevant barred list check from the Disclosure and Barring Service. The Disclosure and Barring Service (DBS) helps us make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups. We will ensure that the correct level of DBS certificate is sought. The purpose of this check is to confirm that the candidate is suitable to perform this work and is not barred from doing so.

All Enhanced Disclosure Certificates will be issued to you directly by the DBS. Consequently, the Charity requires you to provide the original DBS check to the Executive Director upon receipt.

We will make any offer of employment in a regulated activity conditional upon satisfactory background checks, including satisfactory criminal record and barred list checks. We reserve the right not to employ a candidate where these conditions are not satisfied.

WORK THAT BECOMES REGULATED

If work either becomes a regulated activity, or if you are asked to perform work that is a regulated activity, we will require you to provide a satisfactory Enhanced Disclosure with a relevant barred list check from the Disclosure and Barring Service. The purpose of this check is to confirm that you are suitable to perform this work and are not barred from doing so. If you refuse to undertake these checks, or if a disclosure confirms that you have a relevant criminal conviction or have been placed on a relevant barred list, we will investigate the circumstances further and will fully consider the effect of this on continued employment. Where you are not legally permitted to perform a regulated activity, or where we otherwise have reason to believe that this will be inappropriate, we may consider if there are any other non-regulated activities in which you can be employed.

We reserve the right to dismiss you where continued employment cannot be supported.

IF YOU ARE ADDED TO A BARRED LIST

If you are added to a barred list during employment, we cannot legally allow you to continue to engage in a regulated activity. Where you are not permitted to perform a regulated activity, we may investigate if there are any other non-regulated activities in which you can be employed.

We reserve the right to dismiss you where continued employment cannot be supported.

SAFEGUARDING CONCERNS

If a member of staff or volunteer believes there may be a safeguarding concern, the staff member **MUST** keep a record of their concerns and refer the matter to the Executive Director as soon as reasonably practicable.

The Executive Director will review the concern and advise the appropriate staff members on the next steps. Staff members should do their best to maintain confidentiality throughout the process.

Where possible and practicable, it is best practice to advise the client of the report being made and getting their consent. However, this may not always be possible or advisable, particularly in cases where we are concerned for someone's immediate safety. This could be the safety of the client or someone else.

The Charity understands that witnessing abuse and/or self-neglect can impact a member of staff. We affirm our commitment to staff members to provide a supportive environment and assist staff to the best of our ability.

REPORTING SAFETY CONCERNS/ALLEGATIONS OF ABUSE/DISCLOSURE OF SELF-NEGLECT

All staff, and any volunteers engaged on behalf of the Charity, must be vigilant at all times to risks of abuse towards children and/or adults as well as issues of self-neglect and safety concerns. This may include behaviour from the client, relatives or other contacts, other service users, health and social care practitioners, volunteers and members of staff.

Abuse is a violation of an individual's civil or human rights by another person. This can be a single act, or multiple acts and it may occur in a variety of ways. Abuse of an individual may be verbal, physical or psychological. It may occur from a deliberate act or a failure to act.

Abuse may also occur when an individual is persuaded to do something that he or she has not consented to, or is unable to consent to, or where the individual is exploited by another person.

Self-neglect covers a wide range of behaviour to care for one's personal hygiene, healthy or surroundings; this includes both intentional and non-intentional self-neglect.

If you believe or suspect that a child and /or adult has been subjected to, or is at risk of abuse, you must refer the matter to the Executive Director as soon as reasonably practicable. We will consider all allegations of abuse seriously. In serious instances where abuse is occurring at that moment, it may be advisable to contact the police.

When reporting an allegation of abuse or concern around self-neglect or safety, it is important to provide as much detail as possible, including the name of the person who has been subjected to abuse, the nature of the abuse, the dates and times of any specific incidents and details of any evidence or other witnesses that may be available.

IN THE EVENT OF A DISCLOSURE

All allegations or suspicions must be taken seriously when there is a possibility that abuse or considerable harm may be involved. Staff should remain calm and reassuring throughout any discussions with a young person or vulnerable adult who is disclosing abuse or suspected abuse or issues. Under no circumstances should staff promise complete confidentiality. The staff member should explain that if an individual's safety is at risk, then information will be shared with the relevant authorities for the purposes of child protection. The Executive Director or, with the approval of the Executive Director, the relevant staff member will report to the police or social services as relevant.

DUTY TO REFER INFORMATION

The Charity will discuss any safeguarding concerns with the local safeguarding team and would encourage any staff member with concerns to do the same. Please remember that it is not for you to decide a child or vulnerable adult is or may be at risk of harm or abuse, but it is for you to refer that information to the professional bodies that can assess risk and act as required.

The relevant bodies are:

The Local Children's Social Care Agency
The Local Adults Safeguarding Authority
The Police (Child Protection or Adult Protection) Investigation Unit
The NSPCC
The Care Quality Commission

We are legally required to refer certain information about an individual to the Disclosure and Barring Service.

This duty applies where:

(a) you are dismissed because you have harmed or may harm a child or adult.
(b) we have suspended you and have reason to believe that you have engaged in relevant conduct or have harmed or may harm a child or adult or have received a caution or a conviction for a relevant criminal offence.
(c) you resign in circumstances where there is a suspicion that you harmed, or may harm, a child or vulnerable adult. This may, for example, arise where an employee resigns before disciplinary action is taken by the organisation.

INVESTIGATION

We will investigate all complaints of alleged or suspected abuse involving our staff fully, in accordance with the disciplinary procedure. We may be required to refer information to the Disclosure and Barring Service and may also consider it necessary to inform the Police of allegations under investigation.

SUSPENSION

We reserve the right to suspend you on full pay pending investigation into an allegation of abuse and pending any resulting disciplinary proceedings.

DISCIPLINARY ACTION

Where we have reason to believe that an allegation of abuse has foundation, we will arrange a disciplinary meeting with the individual. This could result in a decision to take disciplinary action against the employee, up to and including dismissal.

Last reviewed: April 2026
Next review date: May 2028