

THE CHANGE FOUNDATION

SAFEGUARDING POLICY

Ratified by Trustees on 28 September 2026

Written by Rachel Billsberry-Grass and Navjeet Sira

CONTENTS

PAGE		TITLE
01	**1.0**	**Message from The Change Foundation CEO and Safeguarding Trustee**
02	**2.0**	**The Change Foundation Commitment to Safeguarding**
04	**3.0**	**Introduction and Safeguarding Scope**
04	3.1	Introduction to Safeguarding Children
04	3.2	Introduction to Safeguarding Adults
05	3.3	Our Principles
05	3.4	Definitions of Safeguarding
06	3.5	Understanding Abuse 7
07	3.6	Recognising Signs of Abuse or Harm
07	3.7	Mental Health and Safeguarding
08	3.8	Transitional Safeguarding
08	**4.0**	**Roles and Responsibilities**
08	4.1	Safeguarding Responsibilities at TCF
09	4.2	Safeguarding Role Definitions
10	4.3	Reporting Responsibilities
11	4.4	Decision-Making and Escalation
11	4.5	Low-Level Concerns
11	4.6	Training, Induction, and Support
12	4.7	Monitoring and Review
12	4.8	Supporting Staff Involved in Safeguarding Concerns
13	**5.0**	**Responding to Abuse**
13	5.1	How to Approach Conversations About Safety or Wellbeing
13	5.2	Handling Safeguarding Disclosures
14	5.3	Responding to a Direct Disclosure
14	5.4	Recording Information
15	5.5	What Happens Next
15	5.6	Safeguarding Children
15	5.7	Safeguarding Adults
16	5.8	Online Safeguarding Concerns
16	5.9	Responding to Mental Health Safeguarding Concerns
17	5.10	Immediate Risk and Emergency Situations

PAGE		TITLE
17	**6.0**	**Reporting and Referral Procedures**
17	6.1	Safeguarding Reporting Procedures
18	6.2	Internal Reporting and Escalation
18	6.3	External Referrals
19	6.4	Mental Health Referrals and Signposting
19	6.5	Information Sharing and Confidentiality
20	6.6	Record Keeping
20	6.7	Sharing Concerns with Parents and Carers
20	6.8	Safeguarding Tracking and Case Management
21	6.9	Safeguarding Review and Oversight
21	6.10	UK-wide and International Working
21	6.11	Emergency Situations
22	6.12	Allegations Against Staff, Volunteers, Contractors, Therapists, Partners, or Trustees
22	**7.0**	**Safeguarding in Practice**
22	7.1	Age-Appropriate Practice
23	7.2	Online Safeguarding and Digital Practice
24	7.3	Communication and Use of Devices
25	7.4	Safeguarding in Early Years and Crèche Environments
26	7.5	Working with Partner Organisations
26	7.6	Physical Contact and Safe Practice in Activities
27	7.7	Visitors and External Individuals
27	7.8	Environment and Safety
28	7.9	Working with External Therapists and Specialist Practitioners
29	7.10	Safeguarding Adults and Older People in
29	**8.0**	**Safer Recruitment and Workforce**
29	8.1	Recruitment Approach
30	8.2	Safer Recruitment Process
30	8.3	DBS Checks and Vetting
31	8.4	DBS Update Service
31	8.5	Volunteers, Coaches, Sessional Staff, Contractors, and Ambassadors
31	8.6	Induction, Training, and Ongoing Suitability
32	8.7	Managing Risk and Unsuitable Behaviour
32	8.8	Working with External Organisations and Contractors
32	**9.0**	**Supporting Documents and Appendices**
58	**10**	**Document Control**

1.0 Message from The Change Foundation CEO and Safeguarding Trustee



"As someone who knows first-hand the life-changing impact of being protected and believed, I understand that safeguarding isn't just a policy, it's a lifeline. At The Change Foundation, we work with some of the most vulnerable people and communities in the UK and beyond. Our commitment to keeping them safe is not a formality, it is the foundation of everything we do. Every decision, every programme, every conversation is shaped by our unwavering duty to protect and empower those in our care. Safeguarding is not only embedded in our culture, it defines it."

Navjeet Sira, CEO of The Change Foundation



"As Safeguarding Trustee, I see it as both a responsibility and a privilege to ensure that every young person, coach, team member and volunteer at The Change Foundation is safe, heard, and valued. Safeguarding is not just about preventing harm, it's about creating spaces where trust can grow, potential can thrive, and dignity is never compromised. Our culture of care is built on constant learning, listening, and leading with compassion. It's a collective commitment, and I'm proud to be part of an organisation where safeguarding truly shapes who we are and how we work."

Rachel Billsberry-Grass, Safeguarding Trustee of The Change Foundation

2.0 The Change Foundation Commitment to Safeguarding

At The Change Foundation (TCF), safeguarding is a fundamental expression of who we are. We are a values-led, purpose-driven charity using sport and physical activity to foster inclusion, belonging, and personal development.

We work with children, young people, and adults who may be at increased risk of harm. Our commitment to keeping them safe is not a formality, it is the foundation of everything we do. Safeguarding is embedded in our culture, our relationships, and our day-to-day delivery.

We strive to create environments where everyone feels:

- Safe, respected, and supported
- Listened to and taken seriously
- Able to take part and thrive

This policy is informed by current UK legislation and guidance, including:

- Children Acts 1989 and 2004
- Care Act 2014
- Working Together to Safeguard Children 2026
- Data Protection Act 2018 and UK GDPR
- Online Safety Act 2023
- Prevent Duty Guidance

We recognise that safeguarding responsibilities can vary across the UK and internationally. This policy sets a consistent organisational approach, while ensuring that local safeguarding procedures and referral pathways are followed in the area of delivery.

Our approach is:

- Values-led and person-centred, placing the individual at the heart of decisions.
- Preventative and proactive, identifying and reducing risk wherever possible.
- esponsive, acting quickly and appropriately when concerns arise.
- Age-appropriate, ensuring communication, environments, and activities are suitable for the Age and development of participants.
- Trauma-informed, recognising the impact of lived experience on behaviour and wellbeing.

Safeguarding is everyone's responsibility. All staff, trustees, volunteers, contractors, therapists, partners, and anyone working on behalf of TCF are expected to:

- Understand and apply this policy
- Complete safeguarding training and ongoing learning
- Maintain clear professional boundaries
- Recognise and report concerns without delay
- Act in the best interests of those in their care at all times

Safeguarding is not a standalone task. It is how we build trust, create safe spaces, and support long-term change. This policy is a living document and will be reviewed regularly to reflect changes in legislation, guidance, organisational practice, and the needs of the communities we serve.

How to Report a Safeguarding Concern

If you have a safeguarding concern, question, referral, or complaint, please contact the Safeguarding Team:

Email: **safeguarding@changefdn.org.uk**
Phone: **020 8669 2177**

If someone is in immediate danger, or if a crime has taken place, call 999.

Safeguarding Team Contact Details:

Daniel Mynott Lead Safeguarding Officer (LSO)	danielmynott@changefdn.org.uk	020 8669 2177
Ryan Jones Deputy Safeguarding Officer (DLSO)	ryanjones@changefdn.org.uk	020 8669 2177
Rhianna Lenga Deputy Safeguarding Officer (DLSO	Rhiannalenga@changefdn.org.uk	020 8669 2177
Rachel Billsberry-Grass Safeguarding Trustee	rachelbillsberrygrass@changefdn.org.uk	020 8669 2177
Navjeet Sira Chief Executive Officer	navjeetsira@changefdn.org.uk	020 8669 2177

If the concern involves the LSO/DLSO, report directly to the CEO or Safeguarding Trustee.

If the concern involves the CEO or a Trustee, report to the Chair of Trustees or Safeguarding Trustee, unless they are involved.

For further information about how to make a safeguarding referral, see sections 5.10 (urgent) and 6.0 (other).

Concerns about unsafe practice, failures in safeguarding, or concerns that cannot be raised through normal routes should be reported in line with TCF's Whistleblowing Policy.

3. Introduction and Safeguarding Scope

3.1 Introduction to Safeguarding Children

At The Change Foundation, safeguarding children means protecting anyone under the age of 18 from harm, abuse, neglect, and exploitation.

We recognise that children and young people may be vulnerable due to their age, development, and reliance on adults. Our role is to create safe, supportive environments where they can take part, build confidence, and enjoy sport and physical activity without risk of harm.

All staff, volunteers, partners, and representatives are expected to recognise signs of concern and respond appropriately, working with families and relevant agencies where needed.

Staff must never wait for proof before reporting a concern.

3.2 Introduction to Safeguarding Adults

Safeguarding adults applies to all individuals aged 18 and over.

While some adults may have care and support needs that place them at increased risk, safeguarding responsibilities extend to all adults engaging in TCF activities.

TCF works with adults across a wide age range, including adults aged 25+, adults aged 55+, and older people taking part in community, wellbeing, social, and physical activity programmes. We recognise that adults may experience vulnerability at different points in their lives due to factors such as:

- Age
- Health or disability
- Mental health
- Social isolation
- Bereavement
- Personal circumstances
- Dependency on others
- Changes in living circumstances
- Mobility changes
- Coercion, control, or exploitation

We recognise that older people may not identify as vulnerable and may not always meet the legal definition of an adult at risk. However, safeguarding concerns can still arise due to changing health, mobility, isolation, bereavement, mental health, dependency on others, coercion, abuse, exploitation, neglect, or unsafe environments.

Staff should remain alert to changes in behaviour, wellbeing, confidence, attendance, physical presentation, or social connection. This is particularly important where an older person may be becoming more isolated, dependent on others, or less able to keep themselves safe.

TCF adopts a person-centred approach that balances protection with empowerment. We support adults to make informed choices about their safety, while taking appropriate action where there is risk of harm.

Not all adults involved in TCF programmes will meet the legal definition of an adult at risk. However, safeguarding responsibilities still apply to all adults, and staff must remain alert to changing levels of vulnerability.

3.3 Our Principles

TCF is committed to the following safeguarding principles:

- The welfare of children, young people, and adults is paramount.
- Everyone has the right to feel safe, regardless of age, background, identity, or circumstance.
- Safeguarding applies across the whole lifespan, including children, young people, adults, older adults, and people aged 55+.
- Safeguarding is everyone's responsibility.
- All concerns must be taken seriously and reported without delay.
- We promote environments built on trust, respect, dignity, and clear boundaries.
- We respond to concerns fairly, consistently, and appropriately.
- Confidentiality is respected, but never at the expense of safety.
- Safeguarding practice must be age-appropriate and suitable to the needs of participants.
- We work in partnership with families, carers, professionals, and external agencies where appropriate.
- We recognise that safeguarding can apply online, offline, in sessions, in our office, in the community, and in international settings.

3.4 Definitions of Safeguarding

Safeguarding involves both protection from harm and promotion of wellbeing.

This includes:

- Protecting individuals from abuse, neglect, and exploitation.
- Preventing harm to health or development.
- Ensuring safe and effective care and environments.
- Enabling individuals to achieve positive outcomes.
- Recognising risks early and acting before harm escalates.

Adult at Risk

An adult aged 18 or over who has care and support needs and may be unable to protect themselves from abuse or neglect.

The term adult at risk is used in this policy instead of vulnerable adult. This recognises that vulnerability is often linked to circumstances, environment, health, support needs, or risk of harm, rather than being a fixed label attached to a person.

Not all adults engaged in TCF programmes will meet this definition. However, safeguarding responsibilities apply to all adults, and staff should remain alert to changing levels of vulnerability.

Safeguarding Concern

Any worry that a person may be at risk of harm, abuse, neglect, exploitation, or unsafe practice.

Low-Level Concern

A concern about behaviour by a staff member, volunteer, contractor, therapist, partner, or other representative that does not meet the threshold for abuse but may indicate poor practice, boundary concerns, or emerging risk.

Online Harm

Any harm or risk that occurs through digital platforms, online communication, social media, gaming platforms, messaging services, livestreaming, or other online spaces.

Age-Appropriate Practice

Ensuring that communication, activities, environments, content, platforms, and expectations are suitable for the age, maturity, and developmental stage of participants.

3.5 Understanding Abuse

Abuse can take many forms and may significantly affect a person's wellbeing, safety, and development.

The main types of abuse include:

1. Physical abuse
2. Sexual abuse
3. Emotional abuse
4. Neglect

Additional safeguarding concerns may include:

- Bullying and cyberbullying
- Child sexual exploitation
- Criminal exploitation
- County lines
- Domestic abuse
- Grooming, online or offline
- Radicalisation and extremism
- Honour-based abuse
- Forced marriage
- Female genital mutilation
- Self-harm and suicidal ideation
- Online harm, including exposure to inappropriate or harmful content
- Financial abuse or coercion
- Abuse linked to disability, age, identity, or dependency
- Unsafe professional boundaries
- Poor practice that creates risk
- Self-neglect
- Coercion or control by family members, carers, partners, or others
- Unsafe living conditions

Staff must be aware that abuse can take place in person or online, and that online harm should be treated in the same way as offline safeguarding concerns.

3.6 Recognising Signs of Abuse or Harm

Indicators may include:

- Changes in behaviour, mood, or engagement.
- Withdrawal, anxiety, or aggression.
- Fear of certain individuals or environments.
- Unexplained injuries or signs of neglect.
- Inappropriate knowledge, language, or behaviour.
- Unsafe or concerning online activity.
- Disclosures made directly or indirectly.
- Signs of coercion, control, or exploitation.
- Sudden changes in confidence or participation.
- Unexplained gifts, money, or possessions.
- Repeated absence from sessions.
- Concerns raised by another participant, parent, carer, or professional.
- Changes in personal care, hygiene, nutrition, or physical presentation.
- Increased isolation or dependence on another person.
- Confusion, memory concerns, or reduced ability to make safe decisions.

Staff should not wait for proof. Any concern must be reported in line with safeguarding procedures.

Staff should also be aware that vulnerability in adults may not always be visible or permanent. It can change depending on circumstances such as health, environment, isolation, bereavement, financial pressure, coercion, or life events.

3.7 Mental Health and Safeguarding

Mental health is a key part of safeguarding. Poor mental health can increase vulnerability, while strong, consistent support can reduce risk and help people stay safe.

TCF recognises that mental health concerns may become safeguarding concerns where there is risk of harm to the individual or others.

This may include:

- Self-harm or suspected self-harm
- Suicidal thoughts, plans, or attempts
- Serious emotional distress
- Signs of abuse, neglect, coercion, or exploitation linked to mental health
- Behaviour that suggests someone may be unable to keep themselves safe
- Concerns that someone is being controlled, pressured, or isolated
- Sudden or significant changes in behaviour, mood, or participation
- Mental health crisis during a session or activity

Mental health is not automatically a safeguarding concern. It becomes a safeguarding concern where there is risk of harm, abuse, neglect, exploitation, or where someone may be unable to keep themselves safe.

Staff are not expected to diagnose mental health conditions or provide therapeutic support. Their role is to listen, respond calmly, support immediate safety, and report concerns through safeguarding procedures.

TCF takes a person-centred approach, which includes:

Listening to and involving individuals in decisions where safe and appropriate
Respecting dignity, rights, and choices
Providing appropriate support and signposting
Working with families, carers, professionals, and external agencies where needed
Recognising when mental health concerns may create safeguarding risk

Where adults may lack capacity to make decisions about their safety, the principles of the Mental Capacity Act must be followed.

Where there is immediate risk of harm, staff must call 999 and inform the LSO/DLSO as soon as possible.

3.8 Transitional Safeguarding

Safeguarding does not stop at 18.

Young people aged 16–25 may continue to face risks as they move into adulthood. TCF is committed to a transitional safeguarding approach that:

- Recognises ongoing vulnerability
- Maintains consistent relationships and support
- Avoids abrupt withdrawal of support
- Works across children's and adult services where appropriate
- Involves young people in decisions about their safety
- Recognises risks such as exploitation, mental health concerns, homelessness, isolation, and Unsafe relationships

4. Roles and Responsibilities

4.1 Safeguarding Responsibilities at TCF

The Change Foundation is committed to creating safe environments for all participants by:

- Valuing, listening to, and respecting all children, young people, and adults
- Promoting a culture where everyone feels able to raise concerns
- Implementing clear safeguarding policies, procedures, and codes of conduct
- Ensuring safe recruitment, training, and supervision of staff and volunteers
- Responding appropriately to all safeguarding concerns and allegations
- Working in partnership with families, carers, statutory agencies, and professional partners
- Maintaining clear systems for reporting, recording, reviewing, and learning

Safeguarding is a shared responsibility across the organisation.

4.2 Safeguarding Role Definitions

Lead Safeguarding Officer

The senior individual with overall responsibility for safeguarding across TCF.

The LSO will:

- Receive and manage safeguarding concerns
- Support decision-making and escalation
- Make or coordinate referrals to external agencies where required
- Liaise with social care, police, LADO, and other agencies
- Ensure safeguarding records are kept securely
- Support staff with guidance and advice
- Oversee safeguarding tracking and case management
- Support safeguarding review meetings

Deputy Safeguarding Officer (DLSO)

Supports the LSO and acts in their absence.

The DLSO will:

- Receive and manage concerns where required
- Support referrals and escalation
- Provide guidance to staff
- Help maintain safeguarding records
- Support review and learning

Designated Safeguarding Lead (DSL)

The named safeguarding lead within a specific programme, site, or delivery setting.

The DSL will:

- Provide day-to-day safeguarding oversight in that setting
- Support staff and volunteers locally
- Ensure concerns are escalated to the LSO/DLSO
- Support recording and immediate safety actions

Event Safeguarding Lead Officer (ESLO)

The individual responsible for safeguarding at one-off events or short-term activities.

The ESLO will:

- Ensure safeguarding procedures are followed during the event
- Brief staff, volunteers, and visitors where required
- Respond to concerns on the day
- Escalate concerns to the LSO/DLSO
- Ensure concerns are recorded appropriately

Safeguarding Trustee

The Safeguarding Trustee provides governance oversight and will:

- Ensure safeguarding is considered at board level
- Provide challenge and accountability
- Support safeguarding review and policy development
- Ensure trustees understand their safeguarding responsibilities

Chief Executive Officer (CEO)

The CEO is responsible for:

- Ensuring safeguarding is prioritised across the organisation
- Supporting serious case management where required
- Ensuring appropriate action is taken where concerns involve senior staff
- Supporting a culture where safeguarding concerns are taken seriously

All Staff, Volunteers, Contractors, Therapists, Partners, and Representatives

Everyone working with or on behalf of TCF must:

- Understand and follow this policy
- Maintain professional boundaries
- Remain alert to signs of harm or abuse
- Report concerns without delay
- Never investigate concerns themselves
- Act in the best interests of participants
- Complete training appropriate to their role

4.3 Reporting Responsibilities

All safeguarding concerns must be reported to the LSO/DLSO as soon as possible.

Staff must:

- Report concerns on the same day wherever possible
- Record concerns accurately using the individual's own words where possible
- Not delay reporting while waiting for more information
- Not promise confidentiality
- Not investigate

In an emergency or where someone is at immediate risk of harm, staff must:

- Call 999
- Follow instructions from emergency services
- Inform the LSO/DLSO as soon as possible

4.4 Decision-Making and Escalation

The LSO/DLSO is responsible for:

- Assessing the level of risk
- Deciding whether external referral is required
- Making or coordinating referrals
- Determining appropriate internal action
- Consulting with the CEO, Safeguarding Trustee, LADO, police, social care, or other agencies where required

Staff must not:

- Investigate concerns
- Confront individuals involved
- Decide that a concern is not serious enough to report
- Delay reporting while seeking further evidence

Where concerns involve:

A member of staff, volunteer, contractor, therapist, or partner: report to LSO/DLSO
The LSO or DLSO: report directly to the CEO or Safeguarding Trustee
The CEO or trustees: report to the Chair of Trustees or Safeguarding Trustee, as appropriate

4.5 Low-Level Concerns

All staff, volunteers, and representatives must report low-level concerns about behaviour that may:

- Be inconsistent with TCF values
- Indicate poor practice
- Create a risk to participants
- Suggest boundary concerns
- Involve inappropriate communication or behaviour

Low-level concerns must be recorded and reviewed by the LSO/DLSO.

Patterns of low-level concerns will be monitored and may result in escalation where appropriate.

A low-level concern may become a safeguarding concern if new information emerges or if there is a pattern of behaviour.

4.6 Training, Induction, and Support

TCF will ensure that:

- All staff and regular volunteers receive safeguarding training
- Staff understand their responsibilities and reporting procedures
- Additional training is provided based on role and level of contact
- Safeguarding is included in induction
- Safeguarding learning is refreshed regularly
- Staff know how to seek support from the LSO/DLSO

Safeguarding will be discussed regularly through appropriate organisational meetings, including safeguarding review meetings and leadership oversight.

4.7 Monitoring and Review

Safeguarding practice is monitored through:

- Review of safeguarding concerns and actions
- Safeguarding tracking and case management
- Ongoing training and learning
- Leadership and trustee oversight
- Review of low-level concerns and patterns
- Review of policy, forms, and procedures

This policy will be reviewed annually or sooner where:

- Legislation or guidance changes
- Significant safeguarding concerns arise
- Organisational changes require updates
- Review identifies gaps or learning

4.8 Supporting Staff Involved in Safeguarding Concerns

TCF recognises that responding to safeguarding concerns can be emotionally challenging for staff, volunteers, sessional workers, and others working on behalf of the organisation.

Staff may be affected by disclosures, safeguarding incidents, allegations, mental health crises, distressing information, aggressive behaviour, or concerns involving participants they know well.

TCF will support staff by providing access to appropriate support systems, including:

- Guidance from the LSO/DLSO
- Regular supervision and check-ins with a line manager or Leadership Team member
- Access to counselling or mental health support where appropriate
- Access to the Employee Assistance Programme, including PAM Wellbeing where available
- Debriefs following serious, distressing, or complex safeguarding incidents
- Adjusted duties, workload review, or time away from delivery where needed
- Peer support and safe spaces to raise concerns
- Signposting to external wellbeing or professional support where appropriate

Staff should speak to the LSO/DLSO, their line manager, or another appropriate senior person if they feel affected by a safeguarding concern.

Managers and senior staff should remain alert to signs of stress, burnout, secondary trauma, or emotional impact following safeguarding incidents. Support may be needed immediately after an incident or later, as the impact may appear over time.

Seeking support is a professional responsibility. There is no stigma attached to asking for help after dealing with difficult or distressing safeguarding matters.

Support for staff does not replace the need to report, record, or escalate safeguarding concerns in line with this policy.

5. Responding to Abuse

5.1 How to Approach Conversations About Safety or Wellbeing

TCF staff often build strong relationships with participants and may notice when something does not feel right.

If a participant appears withdrawn, distressed, upset, unusually quiet, anxious, aggressive, or not themselves, staff should check in calmly and respectfully.

Use open questions such as:

"How have things been for you lately?"
"You don't seem quite yourself today, how are you feeling?"
"Is everything okay, or is there anything you want to talk about?"
"Can you tell me how safe you are feeling at the moment?"

Staff should:

- Listen carefully
- Give the person time to speak
- Avoid making assumptions
- Avoid asking leading or investigative questions
- Remain calm and non-judgemental
- Explain that concerns about safety may need to be shared

If a concern about safety or wellbeing arises, it must be reported in line with safeguarding procedures.

5.2 Handling Safeguarding Disclosures

A disclosure is when someone shares information about harm, abuse, neglect, exploitation, or something that is making them feel unsafe.

Disclosures may be:

Direct -where the person clearly states what has happened
Indirect - where the person hints, uses unclear language, changes behaviour, or shares partial information

When a disclosure is made, staff must:

- Listen calmly and without judgement
- Take the person seriously
- Allow them to speak at their own pace
- Use simple clarification only
- Reassure them they have done the right thing by speaking up
- Explain that the information must be shared with the safeguarding team to help keep them safe

Staff must not:

- Investigate
- Ask detailed, leading, or repeated questions
- Express shock, disbelief, or personal opinions
- Promise confidentiality
- Confront the alleged person causing harm
- Take photos or collect evidence unless specifically advised by safeguarding leads, police, or statutory agencies

5.3 Responding to a Direct Disclosure

When someone discloses abuse or harm:

Do:

- Stay calm and listen
- Thank them for telling you
- Reassure them they are being taken seriously
- Explain what will happen next
- Record the information as soon as possible
- Report to the LSO/DLSO immediately

Do not:

- Promise to keep it secret
- Ask "why" questions
- Interrupt or rush them
- Attempt to investigate
- Take photos
- Delay reporting
- Discuss the concern with people who do not need to know

All disclosures must be reported to the LSO/DLSO as soon as possible.

5.4 Recording Information

Accurate recording is essential.

Staff must:

- Write down what was said as soon as possible
- Use the individual's own words where possible
- Clearly separate facts from opinion
- Include dates, times, locations, and context
- Include who was present
- Record any immediate action taken
- Complete the appropriate safeguarding report form

Records must be shared securely with the safeguarding team.

Completed forms must be submitted securely to:

safeguarding@changefdn.org.uk

5.5 What Happens Next

Once a concern is reported:

- The LSO/DLSO will assess the information
- Immediate safety needs will be considered
- Appropriate action will be taken
- Referrals may be made to external agencies where required
- The individual will be supported throughout the process where appropriate
- Actions and outcomes will be recorded

TCF will:

- Work with relevant agencies
- Attend meetings where required
- Share information appropriately
- Take internal action where necessary
- Maintain confidentiality on a need-to-know basis

5.6 Safeguarding Children

For children and young people under 18:

- All safeguarding concerns must be reported, even without proof
- Staff must not wait for the child's permission to share concerns
- The child's safety is the priority
- Concerns may need to be shared with Children's Services, police, or other agencies
- Parents/carers should not be informed where doing so may increase risk

If a child is in immediate danger:

Call 999
Inform the LSO/DLSO as soon as possible

5.7 Safeguarding Adults

For adults:

- Consent should be sought before sharing information where appropriate
- The adult's views and wishes should be considered
- Staff should support autonomy and dignity
- Concerns must still be reported where risk exists

Information may need to be shared without consent where:

- There is risk of serious harm
- Others may be at risk
- The adult lacks capacity
- A crime may have been committed
- There is coercion, control, abuse, or exploitation
- There is a safeguarding duty to act

Staff should seek guidance from the LSO/DLSO if unsure.

5.8 Online Safeguarding Concerns

Safeguarding concerns may arise through online activity, including:

- Harmful or inappropriate content
- Grooming or exploitation
- Bullying or harassment
- Unsafe communication
- Coercion or threats
- Image sharing
- Sexualised communication
- Radicalisation or extremist content
- Encouragement of self-harm or suicide

Online concerns must be treated in the same way as offline concerns and reported to the LSO/DLSO.

Where appropriate:

- Screenshots or message logs should be preserved
- Content should not be shared unnecessarily
- Immediate risk should be escalated without delay
- Platforms may need to be reported to
- Police may need to be contacted where a crime has occurred or is suspected

5.9 Responding to Mental Health Safeguarding Concerns

If a participant appears to be experiencing emotional distress, self-harm, suicidal thoughts, or a mental health crisis, staff should respond calmly and without judgement.

Staff should:

- Listen and give the person time to speak
- Use clear, simple, and supportive language
- Ask direct but sensitive questions where there are concerns about immediate safety
- Avoid making promises that cannot be kept
- Avoid trying to provide counselling or therapy
- Stay with the person if there is immediate risk and it is safe to do so
- Seek support from the LSO/DLSO as soon as possible

Staff may ask questions such as:

"Are you feeling safe right now?"
"Are you thinking about hurting yourself?"
"Have you made a plan to harm yourself?"
"Is there someone you trust who can support you?"

If there is immediate risk of harm, staff must call 999.

Where the concern involves a child or young person, staff must report the concern to the LSO/DLSO even if the child asks them not to share it.

Where the concern involves an adult, staff should involve the adult in decisions where possible. However, information may still need to be shared without consent where there is serious risk, risk to others, lack of capacity, or a safeguarding concern.

All mental health safeguarding concerns must be recorded and reported in line with this policy.

Staff involved in responding to a mental health crisis, self-harm concern, suicide risk, or distressing disclosure should be offered a debrief and appropriate support through TCF's staff wellbeing support systems.

5.10 Immediate Risk and Emergency Situations

Immediate risk includes risk of harm to self, risk of harm to others, medical emergency, serious mental health crisis, or immediate safeguarding danger.

If someone is at immediate risk of harm:

- Call 999 without delay
- Follow instructions from emergency services
- Inform the LSO/DLSO as soon as possible
- Complete the safeguarding concern form as soon as safe to do so

Do not delay emergency action to follow internal processes.

Following an emergency or serious safeguarding incident, staff involved should be offered a debrief and access to appropriate support, including line manager support, Employee Assistance Programme support, counselling, or other wellbeing support where appropriate.

6. Reporting and Referral Procedures

6.1 Safeguarding Reporting Procedures

All safeguarding concerns must be reported promptly.

If a concern arises:

- Report it to the LSO/DLSO as soon as possible
- Complete the appropriate safeguarding report form
- Submit the report within 24 hours where possible

If working in a partner setting, such as a school, college, community venue, sports setting, or crèche environment, staff must:

- Follow the host organisation's safeguarding procedures where required
- Inform TCF's LSO/DLSO as soon as possible
- Ensure TCF's internal reporting process is also followed

Staff must not delay reporting while waiting for more information.

6.2 Internal Reporting and Escalation

The LSO/DLSO is the first point of contact for all safeguarding concerns.

They will:

- Review the concern
- Assess risk
- Decide on next steps
- Make or coordinate referrals where required
- Consult with the CEO, Safeguarding Trustee, LADO, police, local authority, or other agencies where required

Staff must not:

- Investigate concerns
- Decide whether a concern is serious enough
- Make safeguarding decisions alone
- Delay reporting

6.3 External Referrals

Referrals to external agencies may be made by the LSO or DLSO.

External agencies may include:

- Children's Services
- Adult Social Care
- Police
- Local Authority Designated Officer
- Prevent / Channel contacts
- Safeguarding partnerships
- Health services
- Other relevant local or national agencies

The LSO/DLSO will:

- Assess the level of risk
- Determine whether a referral is required
- Make the referral in line with local safeguarding procedures
- Record the referral and outcome

In urgent situations where neither the LSO nor DLSO is available, staff may contact emergency services or relevant authorities directly and must inform the LSO/DLSO as soon as possible.

6.4 Mental Health Referrals and Signposting

Where a safeguarding concern involves mental health, self-harm, suicidal thoughts, or emotional crisis, the LSO/DLSO will consider appropriate support and referral routes.

This may include:

- Emergency services, where there is immediate risk
- NHS urgent mental health support
- GP or health services
- Child and Adolescent Mental Health Services where relevant
- Adult mental health services
- School, college, or partner safeguarding leads
- Specialist support organisations
- Family, carers, or trusted adults where appropriate and safe

Staff must not attempt to manage serious mental health concerns alone.

Where a person is at immediate risk of harm, staff must call 999 and inform the LSO/DLSO as soon as possible.

All actions, referrals, signposting, and decisions must be recorded.

6.5 Information Sharing and Confidentiality

Safeguarding information must be shared appropriately to protect individuals from harm.

TCF follows the principles of the Data Protection Act 2018 and UK GDPR.

Key principles:

- Information should be shared on a need-to-know basis
- Safeguarding concerns must not be kept confidential from safeguarding leads
- Consent should be sought where appropriate, particularly with adults
- Information shared should be relevant, necessary, and proportionate
- Decisions to share information should be recorded

Information must be shared without consent where:

- There is risk of serious harm
- A child is involved
- Others may be at risk
- A crime may have been committed
- The person lacks capacity
- There is coercion, control, abuse, neglect, or exploitation

Staff should be open and honest about why information is being shared, unless doing so would increase risk.

This includes information received from external professionals, such as therapists or specialist practitioners, where there is a safeguarding risk.

6.6 Record Keeping

All safeguarding concerns must be recorded accurately and securely.

Records must:

- Be completed using TCF safeguarding forms
- Be clear, factual, and timely
- Include dates, times, and actions taken
- Use the person's own words where possible
- Separate fact from opinion
- Be stored securely
- Be shared only with authorised individuals

Safeguarding records will be retained in line with legal and organisational requirements.

6.7 Sharing Concerns with Parents and Carers

Where appropriate, safeguarding concerns should be shared with parents or carers.

However, this must not be done where:

- It may place the child or individual at further risk
- There are concerns involving the parent or carer
- It may affect a police or statutory investigation
- The LSO/DLSO advises against it

Decisions about sharing information with parents/carers will be made by the LSO/DLSO.

6.8 Safeguarding Tracking and Case Management

TCF maintains a secure safeguarding tracking system to record, monitor, and manage safeguarding concerns and cases.

This system is used to:

- Log safeguarding concerns and actions taken
- Track progress and outcomes of cases
- Identify patterns or recurring concerns
- Support effective safeguarding decision-making
- Record low-level concerns and monitor patterns
- Support safeguarding review meetings

Access to safeguarding records is strictly limited to the LSO, DLSO, and authorised senior staff on a need-to-know basis.

All information is handled in line with the Data Protection Act 2018 and UK GDPR.

The LSO is responsible for ensuring safeguarding records are accurate, up to date, and reviewed appropriately.

6.9 Safeguarding Review and Oversight

TCF operates a Safeguarding Review Team to ensure consistent oversight and management of safeguarding practice.

The Safeguarding Review Team will meet at least every two months to:

- Review safeguarding concerns and active cases in line with confidentiality requirements
- Identify risks, trends, and areas for improvement
- Ensure appropriate actions have been taken
- Review low-level concerns and patterns
- Support organisational learning
- Inform training and policy updates

The Safeguarding Review Team may include:

LSO
DLSO
relevant senior staff

6.10 UK-wide and International Working

TCF operates across different regions of the UK and internationally.

While this policy sets a consistent organisational approach:

- Staff must follow local safeguarding procedures and referral pathways relevant to the area of delivery
- Local authority processes may vary depending on location
- International delivery must consider local law, local referral routes, cultural context, and participant safety
- Staff must seek guidance from the LSO/DLSO where unsure

TCF maintains a separate Referral Contacts Document containing up-to-date safeguarding contacts and referral pathways for each area of delivery across the UK and internationally.

This document will be reviewed and updated regularly to reflect changes in local authority contacts, safeguarding arrangements, and international requirements.

The LSO/DLSO is responsible for ensuring the Referral Contacts Document is maintained and up to date.

The most current version of this document must always be used when making or supporting safeguarding referrals.

6.11 Emergency Situations

If someone is in immediate danger or requires urgent medical attention:

- Call 999 immediately
- Follow instructions from emergency services
- Inform the LSO/DLSO as soon as possible
- Record the concern and action taken as soon as safe to do so

Do not delay emergency action to follow internal processes.

6.12 Allegations Against Staff, Volunteers, Contractors, Therapists, Partners, or Trustees

All allegations must be reported immediately to the LSO/DLSO.

The LSO/DLSO will:

- Assess the concern
- Consider immediate safety actions
- Consult the LADO where required
- Consult police, social care, HR, CEO, or trustees where appropriate
- Ensure records are kept securely
- Take appropriate action, which may include suspension or restriction of duties

If the concern involves:

The LSO/DLSO: report to the CEO or Safeguarding Trustee
The CEO: report to the Chair of Trustees or Safeguarding Trustee
A trustee: report to the Chair of Trustees or Safeguarding Trustee, unless they are involved
The Chair of Trustees: report to the Safeguarding Trustee or another appropriate trustee

All allegations will be handled confidentially and in line with safeguarding procedures.

7. Safeguarding in Practice

7.1 Age-Appropriate Practice

All safeguarding practice at TCF must be age-appropriate and suitable to the developmental stage of participants.

Staff must consider:

- The age and maturity of participants
- The suitability of language, tone, and subject matter
- The level of independence and responsibility expected
- Group dynamics, including mixed age groups
- Whether content, activities, or discussions are suitable
- Whether digital platforms are appropriate for the age group
- Whether additional support is required due to communication needs, disability, trauma, or vulnerability

Staff must not expose participants to content, environments, or expectations that are not appropriate for their age or level of understanding.

Inappropriate exposure to content, language, or environments that are not suitable for a participant's age may constitute a safeguarding concern and must be reported.

7.2 Online Safeguarding and Digital Practice

TCF recognises the increasing role of digital platforms in programme delivery and communication.

Online safeguarding must be treated with the same level of importance as face-to-face safeguarding.

Staff must:

- Use only approved and monitored platforms
- Communicate through official channels only
- Avoid using personal accounts to contact participants
- Prioritise group communication over one-to-one messaging
- Always maintain professional boundaries
- Follow TCF guidance on digital communication

Platform Use and Risk

Before using any digital platform, staff must consider:

- Whether the platform is appropriate for the age group
- Whether it allows private or unmonitored communication
- Whether participants can be contacted by unknown individuals
- Whether it includes chat, livestreaming, image sharing, or gaming functions
- Whether age restrictions apply
- Whether the platform has appropriate reporting and moderation tools

Age Verification and Access

Staff must:

- Follow platform age restrictions
- Respect platform age verification and safety controls
- Not encourage participants to bypass restrictions or verification
- Not support workarounds such as false ages, shared accounts, or unsafe access methods
- Use alternative methods where platforms are not suitable or accessible

Live Sessions

Live online sessions must be appropriately supervised and, where possible, delivered in group settings rather than one-to-one.

Staff must ensure that:

- Sessions are planned and supervised
- Participants understand expectations
- Inappropriate behaviour is addressed
- Concerns are reported in line with safeguarding procedures

Online Harm

Online safeguarding concerns may include:

- Exposure to harmful or inappropriate content
- Grooming or exploitation
- Bullying or harassment
- Unsafe communication
- Coercion or threats
- Image-based abuse
- Sexualised content or contact
- Self-harm or suicide-related content
- Extremist or radicalising material

All online concerns must be reported in line with safeguarding procedures.

Where appropriate:

- Evidence such as screenshots or message logs should be preserved
- Content should not be shared unnecessarily
- Immediate risks should be escalated without delay
- Harmful content may need to be reported to the platform or police

7.3 Communication and Use of Devices

To protect participants:

- Staff must use TCF-approved devices or systems where possible
- Personal devices must not be used to communicate with participants unless explicitly authorised in exceptional circumstances
- Personal social media accounts must not be used to contact participants
- Private messaging with under-18s or adults at risk must be avoided
- Communication must remain transparent, appropriate, and professional

Where communication is necessary:

- It must be through official channels
- It should include another adult where appropriate
- Boundaries must be clear
- Communication must be relevant to programme delivery or support

Breaches of communication expectations may be treated as a safeguarding or conduct concern.

7.4 Safeguarding in Early Years and Crèche Environments

This section applies to work with children under the age of 5, including crèche provision, family-based programmes, and sessions involving babies and toddlers.

Supervision and Responsibility

Appropriate staff-to-child ratios must be maintained in line with EYFS guidance or host setting requirements.

Responsibility for each child must be clearly understood at all times
Clear handover procedures must be followed for arrival and collection
Children must only be collected by authorised individuals
Any concerns regarding collection must be reported immediately

Parents, carers, or nannies remain responsible for children unless the child has been formally handed over to TCF staff.

Where nannies or external carers are present, they are not considered part of the TCF workforce and must not be left solely responsible for groups of children unless formally agreed and risk assessed.

Staff must not assume that external carers are trained in safeguarding to TCF standards.

Personal Care

Personal care, including toileting, nappy changing, changing clothes, or comfort following distress, must:

Only be carried out where necessary
Be conducted safely, respectfully, and with dignity
Take place in an open or observable environment where possible
Be carried out only by trained and authorised staff
Be recorded where appropriate

Physical Contact with Very Young Children

Physical contact with young children may be necessary, for example to comfort, guide, support movement, or keep a child safe.

Physical contact must:

- Be appropriate to the child's age and needs
- Be minimal and proportionate
- Take place in visible settings
- Never be secretive or prolonged
- Never be used to control, punish, intimidate, or restrain unless immediate safety requires intervention

Recognising Risk

Staff must be alert to non-verbal signs of distress, discomfort, harm, or neglect, as very young children may not be able to communicate concerns clearly.

Any concern relating to the care, supervision, treatment, or safety of a child in an early years or crèche setting must be reported in line with safeguarding procedures.

7.5 Working with Partner Organisations

TCF works with partners to deliver programmes and activities.

Before working with partners, TCF will:

- Carry out safeguarding due diligence
- Ensure safeguarding expectations are clearly understood
- Clarify reporting routes
- Confirm responsibility for participants
- Ensure information sharing expectations are understood

Partners must:

- Have appropriate safeguarding policies and procedures
- Cooperate with safeguarding concerns and investigations
- Share relevant information where required
- Report concerns promptly
- Ensure their staff understand safeguarding expectations

If a partner fails to meet safeguarding standards, TCF may:

- Pause or suspend activity
- Restrict involvement
- End the partnership
- Take appropriate action to protect participants

7.6 Physical Contact and Safe Practice in Activities

Physical contact may be necessary in sport and physical activity settings.

Contact must:

- Have a clear purpose, such as safety, support, or demonstration
- Be explained where possible
- Be consented to where appropriate
- Be appropriate to age, context, and need
- Take place in an open and observable environment
- Be minimal and proportionate

Unacceptable contact includes:

- Secretive, prolonged, or unnecessary contact
- Contact involving intimate areas
- Contact intended to control, intimidate, punish, or harm
- Any contact that makes a participant uncomfortable

Concerns about physical contact must be reported in line with safeguarding procedures.

7.7 Visitors and External Individuals

All visitors, including media representatives, guests, funders, contractors, and external individuals attending TCF activities, must:

- Be supervised where appropriate
- Follow TCF safeguarding expectations
- Not be left alone with participants unless authorised and risk assessed
- Report any concerns immediately to TCF staff

Appropriate consent must be obtained before:

- Photography
- Filming
- Recording
- Sharing media
- Using participant stories or identifying information

Any concerns involving visitors must be reported immediately.

7.8 Environment and Safety

TCF environments must be:

- Safe, secure, and suitable for the activity
- Appropriately supervised
- Set up to minimise risk
- Accessible where possible
- Age-appropriate
- Managed to prevent unauthorised access to participants

Staff must remain aware of:

- Access and exit points
- Supervision levels
- Potential hazards
- Privacy risks
- Mixed-age settings
- Safe use of changing, toileting, or private spaces

Any safety concerns must be addressed immediately and reported where appropriate.

Staff must also consider their own safety and wellbeing when responding to incidents. Where there is aggression, violence, serious distress, mental health crisis, or immediate risk, staff should seek support and contact emergency services where required. Staff should not manage unsafe situations alone.

7.9 Working with External Therapists and Specialist Practitioners

TCF may work with external therapists, counsellors, or specialist practitioners as part of programme delivery or participant support.

While these individuals may operate under their own professional frameworks, safeguarding remains a shared responsibility.

Roles and Responsibilities

External therapists are responsible for safeguarding within their professional role
TCF remains responsible for safeguarding within its programmes and environments
Responsibilities must be clearly agreed before delivery begins
Safeguarding reporting expectations must be clearly understood

Safeguarding and Information Sharing

External therapists must share safeguarding concerns with TCF where there is a risk of harm to the individual or others, or where the concern impacts the safety of participants within TCF activities.

This includes concerns relating to abuse, neglect, exploitation, self-harm, suicidal ideation, coercion, unsafe relationships, or any situation where an individual may be at risk.

Therapists are not required to share general therapeutic content. However, confidentiality must not prevent the sharing of safeguarding concerns where there is a risk of harm.

Where there is uncertainty, therapists should seek advice from the TCF LSO/DLSO.

Boundaries and Communication

Clear boundaries must be maintained between therapeutic work and programme delivery
Staff must not take on therapeutic roles
Therapists must not take on responsibilities outside their agreed role
Communication routes and record keeping expectations must be agreed before delivery begins

Consent and Clarity

Participants, and parents/carers where appropriate, must understand:

- The role of the therapist
- How information may be shared
- The limits of confidentiality
- How safeguarding concerns will be managed

Risk Management

TCF will:

- Carry out appropriate due diligence
- Confirm qualifications and insurance
- Ensure safeguarding expectations are understood
- Ensure appropriate checks are completed where required
- Take action where concerns arise

Concerns about a therapist's practice must be reported in line with safeguarding procedures and may result in suspension of work while concerns are reviewed.

7.10 Safeguarding Adults and Older People in Practice

TCF delivers activities and programmes involving adults of all ages, including adults aged 25+, adults aged 55+, and older people.

Staff must recognise that safeguarding concerns for adults and older people may present differently from concerns involving children and young people.

This may include:

- Social isolation or loneliness
- Changes in physical or mental health
- Reduced mobility or increased dependency
- Financial abuse or coercion
- Domestic abuse or controlling relationships
- Neglect or self-neglect
- Pressure from family members, carers, or others
- Confusion, memory concerns, or reduced capacity
- Unexplained injuries, fearfulness, or withdrawal
- Sudden changes in attendance, mood, or confidence
- Poor hygiene, malnutrition, or untreated health issues
- Concerns about unsafe living conditions
- Over-reliance on a particular person or carer

Staff should not assume that an adult is safe because they appear independent, confident, or do not ask for help.

Where concerns arise, staff must report them to the LSO/DLSO in line with this policy. Adults should be involved in decisions about their safety wherever possible, unless doing so would increase risk, others may be at risk, or the adult may lack capacity to make the relevant decision.

8. Safer Recruitment and Workforce

8.1 Recruitment Approach

TCF is committed to safer recruitment practices to ensure that all individuals working with participants are suitable and safe to do so.

Recruitment processes are designed to:

- Protect children, young people, and adults
- Deter unsuitable individuals from applying
- Identify and manage risk appropriately
- Ensure safeguarding responsibilities are clear from the start

All recruitment decisions are made in line with safeguarding responsibilities and organisational values.

8.2 Safer Recruitment Process

TCF applies a safer recruitment process for all staff and relevant roles, which includes:

- Clear role descriptions outlining safeguarding responsibilities
- Transparent advertising where roles involve working with children or adults
- Completion of an application form, including employment history
- Structured interviews to assess suitability
- Verification of identity, qualifications, and right to work
- Obtaining and reviewing references
- Exploring employment gaps or concerns
- Completing appropriate DBS checks where eligible
- Safeguarding induction and training

Any gaps in employment or concerns identified during recruitment will be explored.

8.3 DBS Checks and Vetting

TCF operates in environments where children and young people are regularly present. As a result, the majority of roles within the organisation involve direct or indirect contact with participants.

TCF will require an Enhanced DBS check, including barred list check where applicable, for all roles that meet the eligibility criteria under DBS legislation. This includes delivery staff, programme staff, and office-based roles where there is regular access to participants.

The level of DBS check required will be determined based on:

- The nature of the role
- Frequency and nature of contact with participants
- Level of supervision
- Access to delivery environments
- Whether the role involves regulated activity

In practice, the majority of roles involving direct delivery, supervision, regular contact with participants, or access to settings where participants are present will require an Enhanced DBS check.

DBS checks must be completed before individuals begin unsupervised work with participants.

No individual will be permitted to work unsupervised in environments where participants are present unless appropriate safeguarding checks have been completed.

Where a role is not legally eligible for an Enhanced DBS check, TCF will implement appropriate safeguarding controls, including:

- Supervision
- Restricted access to participants
- Clear role boundaries
- Risk assessment
- Safeguarding briefing or training

All individuals, regardless of DBS eligibility, must complete safeguarding training appropriate to their role.

8.4 DBS Update Service

Where appropriate, staff are encouraged or required, depending on role, to register with the DBS Update Service.

This allows TCF to:

- Carry out ongoing status checks
- Confirm continued suitability
- Support safer recruitment and ongoing vetting

TCF will support access to the Update Service where applicable.

8.5 Volunteers, Coaches, Sessional Staff, Contractors, and Ambassadors

Safeguarding requirements apply to all individuals working with or on behalf of TCF, including:

- Volunteers
- Sessional coaches
- Freelancers
- Contractors
- Ambassadors
- Specialist practitioners
- External delivery staff

Depending on the role, individuals may be required to:

- Complete safeguarding training
- Undergo appropriate DBS checks
- Receive safeguarding briefings before delivery
- Work under supervision
- Follow TCF safeguarding procedures

Volunteers or one-off staff must:

- Be supervised appropriately
- Not be left alone with participants unless authorised and checked
- Report concerns immediately
- Follow the TCF code of conduct and safeguarding expectations

8.6 Induction, Training, and Ongoing Suitability

All staff and relevant volunteers will:

- Receive safeguarding training as part of induction
- Understand their responsibilities before working with participants
- Receive ongoing training and updates
- Understand reporting routes
- Understand professional boundaries

TCF may require:

- Periodic DBS re-checks
- Confirmation of continued suitability
- Additional training where risks or roles change
- Annual suitability declarations
- Increased supervision where concerns arise

8.7 Managing Risk and Unsuitable Behaviour

If concerns arise about an individual's suitability:

- Appropriate action will be taken to manage risk
- This may include supervision, role adjustment, suspension, or removal from activity
- Safeguarding concerns will be reported in line with this policy
- Low-level concerns will be recorded and monitored
- Allegations will be managed through the appropriate safeguarding process

Where required, TCF will:

- Refer individuals to the DBS
- Contact the LADO
- Report concerns to police or statutory agencies
- Take internal disciplinary or management action

8.8 Working with External Organisations and Contractors

Where TCF works with external providers or contractors:

- Safeguarding responsibilities must be clearly agreed
- Appropriate checks must be in place
- Expectations must be communicated before delivery
- Concerns must be reported promptly
- Access to participants must be risk assessed

TCF reserves the right to:

- Request evidence of safeguarding compliance
- Restrict access
- Stop delivery
- End working arrangements where standards are not met

9. Supporting Documents and Appendices

The following supporting documents sit alongside this Safeguarding Policy and should be used to support day-to-day safeguarding practice.

These documents are maintained separately from the main policy so they can be reviewed and updated regularly without requiring a full policy review.

Supporting documents include:

- Referral Contacts Document
- Safeguarding Tracking System
- Online Safety and Digital Communication Guidance
- Early Years / Crèche Guidance
- Low-Level Concerns Guidance
- Safeguarding Flowcharts
- Safeguarding Reporting Forms

The LSO/DLSO is responsible for ensuring these documents are maintained, reviewed, and accessible to relevant staff.

Staff must use the most up-to-date version of each supporting document when responding to safeguarding concerns.

Appendix 1 — Safeguarding Reporting Forms

This appendix includes:

- Safeguarding Concern / Incident Form
- Low-Level Concern Form
- Early Years / Crèche Incident Form

SAFEGUARDING CONCERN / INCIDENT FORM

(Universal Form — Children, Young People, Adults, Adults at Risk, Online Concerns)
To be completed as fully as possible if you have concerns regarding anyone involved in The Change Foundation activities or services.

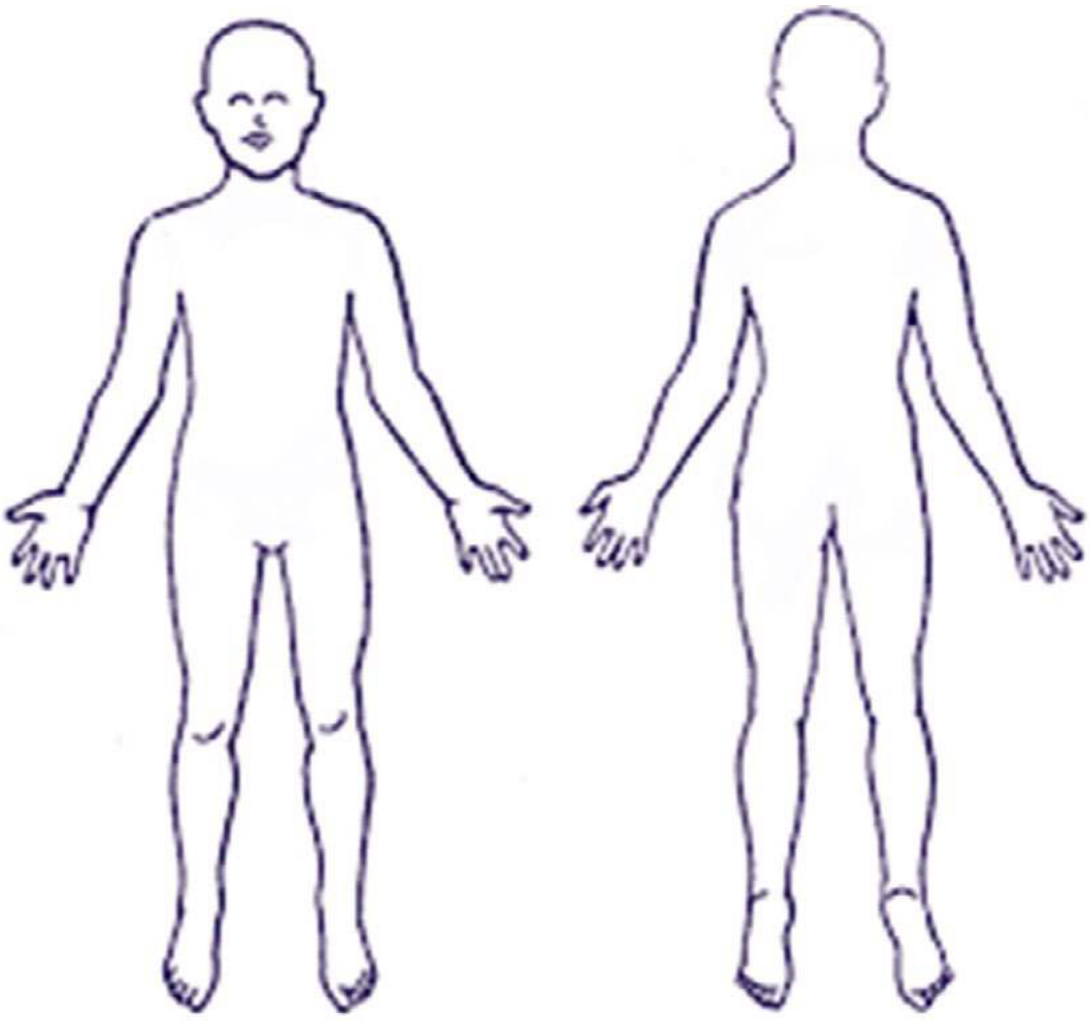
Explain you have a duty to pass any concerns onto the Lead Safeguarding Officer (LSO). The LSO will then look at the information and start to plan a course of action.

SECTION 1 — REPORT DETAILS	
Date of report:	Time of report:
Name of Person Completing Form:	
Role:	
Contact Number:	
Email Address:	

SECTION 2 — PERSON(S) INVOLVED	
Name of Individual:	Age / DOB:
Gender (if relevant / disclosed):	
Programme:	
Parent / Carer Details (if applicable):	
Concern relates to: O Child / Young Person O Adult O Adult at Risk O Multiple Individuals O Concern About Staff / Volunteer	

SECTION 3 — TYPE OF CONCERN
O Physical Abuse O Emotional Abuse O Sexual Abuse O Neglect O Bullying O Online Safeguarding Concern O Grooming / Exploitation O Domestic Abuse O Mental Health Concern O Self-Harm / Suicidal Ideation O Radicalisation / Extremism O Low-Level Concern O Boundary Concern O Other (please specify)
Other please add

SECTION 4 — DETAILS OF CONCERN	
What happened? (Use exact words where possible)	
Date/Time of Incident or Concern:	Location:
How did the concern come to your attention? O Observed directly O Reported by another person O Disclosure by participant O Online activity O Other	
If other please give details	

SECTION 4.1 — BODY MAP (IF APPLICABLE)
Use the body map to record the location of visible injuries, marks, or areas of concern. Do not take photographs unless specifically authorised through safeguarding or police procedures.
Guidance: Record factual observations only Do not guess causes of injuries Use exact words where possible Include size, colour, and location if visible
Completion of a body map does not replace the need to report concerns immediately.
Body map 
Any additional notes

SECTION 5 — IMMEDIATE RISK
Is anyone currently at immediate risk of harm? O Yes O No If yes, what action was taken? Who is currently at risk?
Is there concern about self-harm, suicidal thoughts, or mental health crisis? O Yes O No O Unsure If yes or unsure, what action was taken?
Were emergency services contacted? O Yes O No If yes: Provide details/reference number:

SECTION 6 — ONLINE SAFEGUARDING (IF APPLICABLE)
Platform/App involved: Was digital evidence retained? O Screenshot O Message Log O Image/Video O Other
If other, please tell us
Was content removed/reported?” O Yes O No O N/A

SECTION 7 — OTHER PEOPLE INVOLVED
Were any other participants affected? O Yes O No
If yes, provide details:

SECTION 8 — EXTERNAL PROFESSIONALS INVOLVED
O Therapist O Social Worker O School / College O Police O Other Agency
Please give details

SECTION 9 — ACTION TAKEN
Who was the concern reported to? O LSO O DLSO O DSL O ESLO
Date/Time Reported: Initial Action Taken:

SECTION 10 — ADULT SAFEGUARDING CONSIDERATIONS (IF APPLICABLE)
Was consent discussed? O Yes O No
If not why?
Does the adult appear to have capacity to make decisions regarding their safety? O Yes O No O Unsure Please give details
Are others potentially at risk? O Yes O No Please give details

SECTION 11 — REFERRAL DETAILS	
Was an external referral made? O Yes O No If yes: please fill out below	
Agency Referred To:	Name of Referrer:
Date/Time of Referral:	
Outcome / Action Taken:	

SECTION 12 — INFORMATION SHARING AND INTERNAL COMMUNICATION	
Who else has been informed of this issue? – and what was the reason for information sharing	
Consultation with Lead Safeguarding Officer	Dates and times
Completed Form copied to Lead Safeguarding Officer; Date and time	
Name of LSO/DLSO Completing Office Review:	
Signed:	Date:

SECTION 13 — CONFIDENTIALITY
Information recorded within this form will be handled confidentially and shared only on a need-to-know basis in line with safeguarding and data protection requirements.

SECTION 14 — SUBMISSION
Completed forms must be submitted securely to: **safeguarding@changefdn.org.uk**

RETENTION NOTICE
Records will be retained securely in line with TCF safeguarding and data protection procedures.

OFFICE USE ONLY
Sharing the concerns (To be completed by Lead Safeguarding Officer) Details of your contact with the person at risk of harm. Have they consented to information being shared outside of The Change Foundation?
Details of contact with the Local Authority Safeguarding Team/MASA where the person at r isk of harm lives – advice can be still sought.
Details of any other agencies contacted:
Details of the outcome of this concern:
Case Status: O Open O Monitoring O Closed
Date Closed:
Closed By:
Signed

LOW-LEVEL CONCERN FORM

(Universal Form — Children, Young People, Adults, Adults at Risk, Online Concerns)
To be completed as fully as possible if you have concerns regarding anyone involved in The Change Foundation activities or services.

Explain you have a duty to pass any concerns onto the Lead Safeguarding Officer (LSO). The LSO will then look at the information and start to plan a course of action.

SECTION 1 — REPORT DETAILS	
Date of report:	Time of report:
Name of Person Completing Form:	
Role:	
Contact Number:	Email Address:

SECTION 2 — INDIVIDUAL OF CONCERN
Name of Individual:
Programme:
Concern relates to: O Child / Young Person O Adult O Adult at Risk O Multiple Individuals O Concern About Staff / Volunteer

SECTION 3 — NATURE OF CONCERN
Examples may include: boundary concerns inappropriate language or behaviour unprofessional conduct inconsistent safeguarding practice communication concerns failure to follow safeguarding procedures concerning behaviour online or in person
Type of Concern O Boundary Concern O Communication Concern O Professional Conduct O Online Behaviour O Safeguarding Practice Concern O Other
If other, please provide details:

SECTION 4 — DETAILS OF CONCERN	
What happened? (Provide factual details only)	
Date/Time of Concern:	Location:
Was anyone else present? O Yes O No	
If yes, provide details:	

SECTION 5 — ACTION TAKEN
Was this discussed with the individual concerned? O Yes O No
If yes, provide details:
Was advice sought from: O LSO O DLSO O DSL O ESLO
Immediate action taken (if any):

SECTION 6 — FOLLOW-UP
Does this concern require follow-up? O Yes O No
If yes, provide details:
Are there previous concerns relating to this individual? O Yes O No O Unknown

SECTION 13 — CONFIDENTIALITY
Information recorded within this form will be handled confidentially and shared only on a need-to-know basis in line with safeguarding and data protection requirements.

SECTION 14 — SUBMISSION
Completed forms must be submitted securely to: safeguarding@changefdn.org.uk

RETENTION NOTICE
Records will be retained securely in line with TCF safeguarding and data protection procedures.

OFFICE USE ONLY
Sharing the concerns (To be completed by Lead Safeguarding Officer) Reviewed By: O LSO O DLSO
Outcome: O No Further Action O Monitoring Required O Advice / Guidance Given O Escalated to Safeguarding Concern O Referred to HR / Management O Other
Details of Outcome:
Case Status: O Open O Monitoring O Closed
Date Closed: Closed By: Signed

EARLY YEARS / CRÈCHE INCIDENT FORM

To be completed for incidents, concerns, injuries, supervision issues, or safeguarding concerns relating to children in early years, crèche, or family-based provision.

SECTION 1 — REPORT DETAILS	
Date of report:	Time of report
Name of Person Completing Form	
Role:	
Contact Number:	
Email Address:	

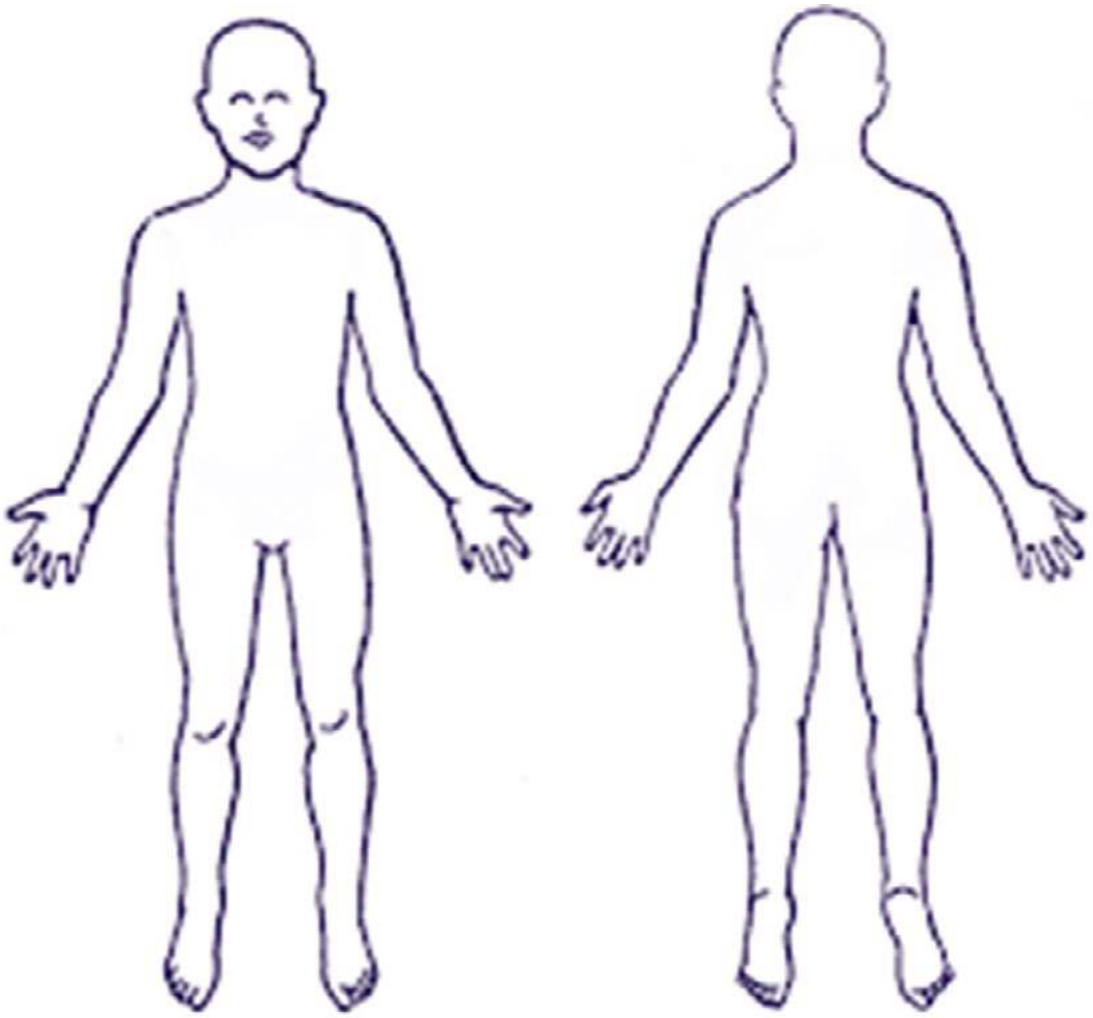
SECTION 2 — CHILD DETAILS	
Child Name:	Date of Birth / Age:
Session / Programme	
Date:	Time:

SECTION 3 — INCIDENT TYPE
O Collection Concern
O Injury / Accident
O Distress / Upset
O Supervision Issue
O Personal Care Concern
O Missing Child Concern
O Behaviour Concern
O Safeguarding Concern
O Other
Other please add

SECTION 4 — DETAILS OF CONCERN
What happened? (Use exact words where possible)
Date/Time of Incident or Concern: Location:
How did the concern come to your attention? O Observed directly O Reported by another person O Disclosure by participant O Other
If other, please give details

SECTION 5 — RESPONSIBILITY / HANDOVER
Who was responsible for the child at the time? Was the child formally handed over to TCF staff? O Yes O No
Was the child collected by an authorised individual? O Yes O No
If no or concerns raised, provide details:

SECTION 6 — PERSONAL CARE (IF APPLICABLE)
Did the incident involve personal care? O Yes O No
If yes: O Toileting O Nappy Changing O Changing Clothes O Comfort / Emotional Support O Other
Provide details:

SECTION 6 — BODY MAP (IF APPLICABLE)
Use the body map to record the location of visible injuries, marks, or areas of concern. Do not take photographs unless specifically authorised through safeguarding or police procedures.
Guidance: Record factual observations only Do not guess causes of injuries Use exact words where possible Include size, colour, and location if visible
Completion of a body map does not replace the need to report concerns immediately.
Body map 
Any additional notes

SECTION 7 — ACTION TAKEN
Was parent/carer informed? O Yes O No
If yes please give date: Any Immediate action taken?
Was medical attention required? O Yes O No
If so, what was done?

SECTION 8 — REPORTING
Who was the concern reported to? O LSO O DLSO O DSL
Date/Time Reported:
Initial Action Taken:

SECTION 9 — CONFIDENTIALITY
Information recorded within this form will be handled confidentially and shared only on a need-to-know basis in line with safeguarding and data protection requirements.

SECTION 10 — SUBMISSION
Completed forms must be submitted securely to: **safeguarding@changefdn.org.uk**

RETENTION NOTICE
Records will be retained securely in line with TCF safeguarding and data protection procedures.

OFFICE USE ONLY
Reviewed By: O LSO O DLSO
Outcome / Follow-Up:
Case Status: O Open O Monitoring O Closed
Date Closed:
Closed By:
Signed

Appendix 2 — Safeguarding Flowcharts

The following safeguarding flowcharts support the practical application of this policy and should be used alongside safeguarding procedures and reporting requirements.

This appendix includes:

Child Safeguarding Concern Flowchart
Adult Safeguarding Concern Flowchart
Mental Health Safeguarding Concern Flowchart
Session / Activity Safeguarding Flowchart
Allegation Against Staff / Volunteer Flowchart
Early Years / Crèche Safeguarding Flowchart
Child Safeguarding Concern Flowchart

Child Safeguarding Concern Flowchart



Immediate escalation required for:

- immediate danger
- serious injury or medical emergency
- self-harm or suicidal thoughts
- mental health crisis
- risk of harm to self or others
- disclosure of abuse or exploitation
- missing child concern
- serious online harm or grooming concern

Adult Safeguarding Concern Flowchart

Concern identified

Immediate risk assessed

Adult views and consent considered where appropriate

Concern reported to LSO/DLSO

Safeguarding form completed

Referral made where appropriate

Ongoing support and monitoring

Immediate escalation required for:

- immediate danger
- serious injury or medical emergency
- self-harm or suicidal thoughts
- mental health crisis
- risk of harm to self or others
- abuse, neglect, coercion, or exploitation
- concern that the adult may lack capacity to keep themselves safe
- risk to other adults or children
- significant concern involving isolation, self-neglect, coercion, dependency, or unsafe living conditions
- concern that an older person may be unable to keep themselves safe
- concern involving financial abuse, pressure, or control by another person

Mental Health Safeguarding Concern Flowchart

Mental health concern identified

Check immediate safety

If immediate risk call 999

Stay with the person if safe to do so

Inform LSO/ DLSO as soon as possible

Record concern factually

LSO/DLSO considers support, refferel, or signposting

Ongoing monitoring and follow-up

Immediate escalation required for:

- suicidal thoughts with plan or intent
- self-harm or suspected self-harm
- immediate risk to self or others
- serious emotional distress
- mental health crisis during a session
- concern that the person cannot keep themselves safe
- concern linked to abuse, coercion, exploitation, or neglect

Staff must:

- listen calmly
- use clear and simple language
- ask direct but sensitive safety questions where needed
- not try to provide therapy
- not promise confidentiality
- not leave someone alone if there is immediate risk and it is safe to stay
- report and record the concern

Session / Activity Safeguarding Flowchart

Concern arises during activity/ session

Immediate safety addressed

LSO/DLSO informed

Safgeguarding concern recorded

Appropriate actrion taken

Immediate escalation required for:

- immediate danger
- medical emergency
- self-harm or suicidal thoughts
- mental health crisis
- serious disclosure
- unsafe behaviour creating risk to self or others
- online harm during session
- concern involving staff, volunteer, therapist, or partner

Allegation Against Staff / Volunteer Flowchart

Concern or allegation identified

Immediate report to LSO/DLSO

Risk assessed

LADO/external agencies contacted where required

Appropriate management action taken

Ongoing monitoring and outcome recorded

Immediate escalation required for:

- allegation of abuse
- unsafe professional boundaries
- inappropriate physical contact
- inappropriate communication
- concern involving online behaviour
- concern involving mental health risk caused or worsened by staff conduct
- repeated low-level concerns
- any behaviour that may place participants at risk

Early Years / Crèche Safeguarding Flowchart

Incident, concern, injury, or safeguarding issue identified

Immediate safety and supervision of child ensured

Parent/carer informed where appropriate

Immediate risk assessed

Emergency services contacted if required

Concern reported to LSO/DLSO/ DSL

Early Years / Crèche Incident Form completed

Further safeguarding action or referral considered

Ongoing monitoring and support

Immediate escalation required for:

- missing child concerns
- unauthorised collection attempts
- unexplained injuries
- serious supervision failures
- safeguarding disclosures or concerns
- medical emergencies
- serious distress or signs of trauma
- concern linked to neglect, abuse, or unsafe care

Staff must:

- maintain clear responsibility for children at all times
- follow handover and collection procedures
- record incidents factually and promptly
- seek support from LSO/DLSO if unsure

Key Safeguarding Principles for All Flowcharts

- Do not investigate concerns yourself
- Do not delay reporting
- Do not promise confidentiality
- Record factual information only
- If in doubt, seek advice from the LSO/DLSO
- Immediate risk should always be treated as an emergency
- Mental health concerns must be escalated where there is risk of harm to self or others
- Staff are not expected to provide therapy or clinical support
- Staff should not manage distressing or unsafe situations alone
- Staff involved in serious or distressing incidents should be offered a debrief and support

All safeguarding concerns should be reported securely to:
safeguarding@changefdn.org.uk

Appendix 3 — Referral Contacts Document

TCF maintains a separate Referral Contacts Document containing up-to-date safeguarding contacts and referral pathways for areas of delivery across the UK and internationally.

This document is held separately from the main policy and must be used when making or supporting safeguarding referrals.

Appendix 4 — Online Safety and Digital Communication Guidance

TCF maintains separate Online Safety and Digital Communication Guidance to support safe digital practice, including approved platforms, online communication, age restrictions, live online delivery, digital boundaries, professional conduct, digital evidence, and reporting.

This guidance is held separately from the main policy and should be followed by all relevant staff.

Appendix 5 — Safeguarding Tracking and Case Management

TCF maintains a secure safeguarding tracking system to record, monitor, and review safeguarding concerns, actions, outcomes, and patterns.

This system is held separately from the main policy. Access is restricted to authorised safeguarding personnel only.

Appendix 6 — Early Years / Crèche Guidance

TCF maintains separate Early Years / Crèche Guidance covering supervision, handover, collection, personal care, ratios, and environment safety.

This guidance is held separately from the main policy and should be followed wherever TCF delivers early years or crèche provision.

Appendix 7 — Low-Level Concerns Guidance

TCF maintains separate Low-Level Concerns Guidance to support staff in recognising, reporting, and responding to behaviour that may indicate poor practice, boundary concerns, or emerging safeguarding risk.

This guidance is held separately from the main policy and should be used alongside the Low-Level Concern Form.

10. Document Control

Policy Owner:
Lead Safeguarding Officer

Approved By:
The Change Foundation Board of Trustees

Policy Review Frequency:
Annually or sooner if required due to:

legislative change
Safeguarding incidents
Organisational change
Updated guidance or best practice

Last Reviewed: September 2026

Next Review Due: October 2027

Approved Date: September 2026