Safeguarding Children and Vulnerable Adults at Risk

1. **Purpose of this policy**

1.1. All charities have a responsibility to ensure they do not cause harm to anyone who has contact with them. Charities working with children or adults at risk have extra responsibilities. As such, Learn English at Home (LEAH) acknowledges a duty of care to include safeguarding and promoting the welfare of children, young people, and adults at risk of harm. This policy sets out the responsibilities and procedures used to meet this duty of care and to ensure accountability.

1.2. LEAH is committed to safeguarding and promoting the welfare of children, young people, and adults at risk of harm and expects all Trustees, staff, and volunteers to share this commitment.

1.3. LEAH will work with its partners in line with the statutory guidance *Working Together to Safeguard Children 2023, a guide to inter-agency working to safeguard and promote the welfare of children*.

2. **Scope**

2.1. This policy applies in respect of:

- children aged under 18, and
- adults aged 18 or over in need of care and support (whether or not those needs are being met), who are experiencing or at risk of abuse or neglect, and because of those needs are unable to protect themselves against the abuse or neglect or the risk of it

2.2. This policy covers all LEAH staff, volunteers, and our board of trustees.

3. **The six key principles of safeguarding**

Empowerment - Support individuals to make their own decisions and give informed consent.

Protection - Support and representation for those in greatest need.

Prevention - It is better to act before harm occurs.

Proportionality – Proportionate and least intrusive response appropriate to the risk presented.

Partnership - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.

Accountability - Accountability and transparency in delivering safeguarding decisions and practices.

4. **Definitions: types of harm**

4.1. Harm can occur in person and online; and be current or historic. The following are potential harms:

- Physical abuse (including domestic violence)
- Sexual abuse (including harassment, grooming etc.)
- Psychological or emotional abuse
- Coercive control
- Financial or material abuse
- Cyber abuse
- Neglect
- Self-neglect or self-harm
- Organisational abuse (abuse within an institution as a result of structure, policies, processes or operating practices)
- Criminal exploitation (pressured into crimes like stealing, drug trafficking)
- FGM (mandatory to report)
- Modern slavery (people trafficking, forced labour etc.)
- Radicalisation
- Personal data breaches

4.2. Some children and adults are more vulnerable because of their previous experiences, level of dependency, communication needs, mental capacity, or other issues.

4.3. LEAH has a responsibility, along with and in partnership with others, to protect the welfare of children and adults at risk.

4.4. Adults are autonomous and make their own decisions. Our role is to support them in their independence, well-being, and choice.

5. **Roles and Responsibilities**

5.1. LEAH is committed to protecting children and adults at risk by ensuring that all staff & volunteers receive an induction, and training to ensure they are fully aware of

their safeguarding responsibilities & LEAH's policies. All suspicions & allegations of abuse must be taken seriously, and responded to appropriately, in a timely way.

The following responsibilities apply in respect of this policy:

5.2. **Head of Charity – Designated Safeguarding Lead**

The Head of Charity is responsible for the successful operation of this policy and is the DSL. In the absence of the head of Charity, the Designated Safeguarding Lead is Barbara Davies, Trustee, who can be contacted at bdavies@leah.org.uk. Alternatively contact or call the LEAH office on 020 8255 6144.

The Head of Charity will:

- Be trained to Level 3
- Respond swiftly to all safeguarding concerns and disclosures.
- Keep suitable and sufficient records.
- Keep up to date with safeguarding practice and policy; and provide advice and support to staff, and volunteers.
- Manage safeguarding referrals.
- Ensure beneficiaries are aware of the safeguarding policy, to aid understanding of LEAH's role in a possible referral.
- Ensure that LEAH staff and volunteers receive effective management and supervision; and can recognise and report potential harm.
- Ensure all staff and volunteers receive safeguarding training and are kept up to date with any changes in practice or policy.
- Report to trustees on LEAH safeguarding matters on an annual basis at the appropriate Board meeting.

5.3. **Board of Trustees**

Trustees have overall responsibility for safeguarding matters within LEAH. They implement appropriate controls to direct and oversee progress, performance, and record-keeping in respect of safeguarding.

Safeguarding is a standard agenda item for quarterly board meetings. All safeguarding incidents are reported to the Board each quarter. A summary of all safeguarding incidents is presented to the Board in an annual safeguarding policy review. Safeguarding is included in the LEAH Risk Register.

The Trustees have designated a lead trustee for safeguarding, Sharon Landa who can be contacted at slanda@leah.org.uk.

The lead trustee is responsible for:

- Collaborating with the Head of Charity to ensure that policies and procedures relating to safeguarding are fit for purpose, robust and adhered to.

- Acting as the Safeguarding Officer in the absence of the DSL (Designated Safeguarding Lead).
- Keeping up to date with the latest guidance, policies, and procedures.
- Acting in the event of an allegation of abuse being made against the Head of Charity.
- Liaising with the Local Authority Designated Officer (LADO) if an allegation is made against a member of staff.

5.4. **Staff and volunteers**

- All staff and volunteers are expected to implement good safeguarding practice across the organisation and report concerns. As such, staff and volunteers must:
- prioritise the safeguarding of children and adults at risk of harm.
- attend safeguarding training when required; and learn how to recognise and report potential harm.
- ensure they are familiar with and understand this policy.
- at all times work professionally, use only appropriate language, and respect boundaries in accordance with our *Code of Good Conduct* (Appendix 2).

5.5. **LEAH students**

Students are given their nominated LEAH Coordinator's name and phone number at the initial pairing stage and are encouraged to contact them with any concerns or questions. The Coordinator calls the beneficiary within the first month of lessons to ensure that all is going well.

LEAH beneficiaries are always responsible for their children during lessons. When the Coordinator introduces the beneficiaries to their volunteer tutor for the first time, they will indicate to the beneficiary that any children should be looked after by the parent and not the volunteer tutor.

6. DBS Checks

There is a robust recruitment and selection process to ensure that all staff and volunteers have the necessary competencies and empathy for their roles.

From 2026 enhanced checks are undertaken for all staff, volunteers, creche workers who directly support the children of beneficiaries in community class settings

Prior to 2026, all staff and volunteers were required to undertake basic DBS checks. These may be rolled over on the DBS system.

DBS check which will be repeated every three years.

7. Safeguarding Training

7.1. The following training is to be undertaken:

- Level 3 safeguarding training: is to be done by the Head of Charity and Lead Trustee, repeated every 3 years.

- Level 2 safeguarding training: is to be done by LEAH coordinators who encounter children.

- All other LEAH staff and LEAH volunteers (including Trustees) are required to complete an online adult safeguarding module and receive an introduction to LEAH's safeguarding processes during their induction.

7.2. All staff and trustees are required to sign LEAH's *Code of Good Conduct* (*Appendix 2*) which shows that they have read and understood LEAH's Safeguarding Children and Vulnerable Adults at Risk policy.

7.3. Volunteers are required to sign a Volunteer Agreement which includes a statement that they have read and understood this policy. Volunteers are not permitted to commence tutoring unless they have successfully completed the safeguarding module, attended the induction session, and signed the Volunteer Agreement. Records are maintained of who has completed these sessions. All LEAH volunteers are required to attend Safeguarding training every three years.

8. **Reporting Concerns or Disclosures about Possible Harm**

8.1. At the initial assessment the LEAH Coordinator indicates if there is a potential safeguarding issue, (see section 4) and records on Lamplight, the level of risk according to a traffic light system:

- Low vulnerability = ESOL support is provided, and the concerns discussed by LEAH Coordinator and Volunteer

- Medium vulnerability = Coordinator contacts the referrer, with client consent, to find out more detailed information.

- High vulnerability = LEAH Head of Charity (DSL) is informed who will contact the appropriate local authority officer immediately.

8.2. If either medium or high vulnerability, a beneficiary will not be paired until the outcome is resolved by the LEAH staff team. If a beneficiary is then paired, all relevant information will be shared with the volunteer.

The *Guidance on Raising a Concern and the LEAH Traffic Light* Tool is in Appendix 1.

8.3. For all students, the Coordinators are expected to check with the volunteer whether there has been any sign of a safe-guarding issue. If an issue arises:

- Volunteers are required to inform their coordinator, immediately.

- If it is believed that a child or adult is in immediate danger and/or in immediate need of medical attention, the matter must be reported to the police and, if

needed, the ambulance service. The DSL then needs to be immediately notified.

- If there is no immediate danger, the Coordinator undertakes an assessment (based on the LEAH Traffic Light tool) of the concern which is recorded on Lamplight. The DSL automatically receives an email summarising this concern, which includes details of what was said/seen, any referrer, the alleged perpetrator, dates and times, age and any other relevant information concerning the child or adult at risk/being harmed.

8.4. The Head of Charity assesses the safeguarding concern and further information, and clarification may be sought. If the concern is allayed, the safeguarding concern will be closed on Lamplight with the appropriate follow-up actions. These actions will be agreed with the Coordinator on a case-by-case basis.

8.5. If the concern is assessed to be serious, the case must be referred to the local authority safeguarding team (see Appendix 3). If the Head of Charity believes criminal activity may have taken place, the matter will also be reported to the police.

8.6. Where appropriate, the volunteer/member of staff will be informed of any outcome to this procedure.

9. **Record Keeping**

9.1. All concerns are recorded within the Safeguarding module on Lamplight.

9.2. Where a child is known to be on a Child Protection Plan, the LEAH Coordinator dealing with the case, and the Head of Charity will review any changes in circumstances every two weeks (or an alternative timeframe as appropriate). Action points from these meetings are recorded and stored on Lamplight.

10. **Sharing information, including with other agencies**

10.1. In operating this policy, staff and volunteers should be aware that, to protect children or adults at risk of harm, it may well be necessary in some circumstances to share what might normally be regarded as confidential information. The following principles will be adhered to:

- Information will only be shared on a need-to-know basis.
- Information will only be shared when it is in the best interests of those at risk.
- Normally, informed consent should be obtained, but if this is not possible, and a child or adult is at risk, it may be necessary to override it.

10.2. LEAH volunteers will be informed of any challenges their student is facing relating to mental health or a history of domestic abuse. If a beneficiary's child is recognised as a child at risk, the volunteer will be told (see LEAH's Confidentiality and Information Sharing Policy). Where a child is known to be on a Child Protection

Plan, the LEAH Coordinator who is dealing with the case will review any changes in circumstances every two weeks (or as agreed) and advise the Head of Charity and volunteer as appropriate.

10.3. It is important that agencies working to safeguard children and adults at risk of harm can share relevant information when necessary to do so. While consent to share is desirable, a lack of consent will not prevent the sharing of information where safeguarding is the priority. Such sharing is permitted under the *Data Protection Act 2018*.

10.4. When LEAH works in partnership with, or as a contractor to, another organisation, it will be defined beforehand which organisation and member of staff will be responsible for leading on safeguarding issues and this will be formalised in the partnership agreement or contract.

11. **Allegations made against LEAH staff or volunteers.**

11.1. LEAH will act promptly to deal with any allegation(s) made against a member of staff or a volunteer.

A failure to act upon a suspected safeguarding concern, or an allegation of perpetrating harm, will result in an internal investigation. Note: this will not prevent or delay separate action under the procedure above (see *Reporting Concerns or Disclosures about Possible Harm*).

The internal investigation will take the following format:

11.2. The Head of Charity will discuss the allegation with the Local Authority Designated Officer (LADO). The Head of Charity will act on the advice given by the LADO, record all information, and keep it secure and confidential.

11.3. If the allegation is made against:

- A member of staff or volunteer the process will be managed by the Head of Charity
- The Head of Charity – process is managed by the Lead Trustee for safeguarding
- A Trustee – process is managed either by the Lead Trustee or the Chair of the Board.

The Trustees may enlist the help of a suitable external investigator. In either case, neither the Head of Charity or Trustee concerned will be involved in any discussion or decision-making in step 11.4 below.

The individual will be asked to account for their actions and the observations of any witnesses will be considered. If there is prima facie evidence that they may have caused harm or put someone at risk because of poor practice, then the matter will be referred immediately to the Trustees.

11.4. The Trustees, in liaison with the Head of Charity:

- consider whether the circumstances warrant a person being suspended from contact with children and/or adults at risk of harm, or whether alternative arrangements can be put in place until the matter is resolved.

- whether the matter should be dealt with through the disciplinary procedure (staff only) or in some other way. In either case, the individual concerned will have the right to be accompanied in the process by a colleague or if applicable, a trade union official (staff only).

- The Trustees will act fairly and ensure that the process that is used can consider the necessary information and evidence to reach a decision.

11.5. Alongside or before any internal process, a child protection investigation (externally led by the LADO), an Adult Safeguarding Enquiry (led by the local authority) and/or a criminal investigation (externally led by the Police) may be held.

11.6. If the staff member or volunteer is charged with a criminal offence by the police, they may be suspended from their role during any internal process. If criminal charges are not brought, then an internal performance review will be undertaken by the Head of Charity to determine next steps.

12. **Monitoring and Review**

12.1. This Policy will be reviewed annually to ensure that it complies with legislative and regulatory requirements and best practice.

It is subject to approval by the Trustees of LEAH and will be presented to the Trustees for approval after each review.

12.2. Performance against the policy will be monitored through:

- Discussions of safeguarding issues as part of staff and volunteer supervision processes

- Annual reporting and quarterly discussions of safeguarding issues presented to the Board.

Appendix 1: Guidance on Raising a Concern

Is it a concern?

Deciding if there is a concern will always be subjective unless you have been a direct witness to the harm. Do not: make assumptions, be blinkered; or avoid asking difficult questions. Try to decide:

- What might happen? Is there an immediate danger?
- What is the likelihood of harm?

What should I do?

- Remain calm and reassuring.
- If you are being told of possible harm, listen without interrupting.
- Always ask open questions
- In the case of a disclosure by a child, modify your responses above in relation to the age of the child and the situation. A very young child may not be aware of the significance of a disclosure they are making and could be alarmed by more than a brief acknowledgement.
- Do not make promises of confidentiality.
- Be open and honest. Say you have concerns about their well-being; and that you may need to share the information with your manager.
- Wherever possible you should seek consent from the person involved about what information you will be sharing, and with whom; explain why.
- Remember, it is not your job to investigate. Always follow this safeguarding procedure.
- Record information about the person, alleged abuser, indicators, disclosures (what was said using their own words) or incidents.
- Include dates. Clarify what you have been told. Record if they have or haven't given you permission to share their information. Record the reason given by the individual if consent was not given.
- Do not keep concerns to yourself. Discuss with your LEAH Coordinator, Head of Charity (the DSL) or other Safeguarding Lead when necessary.
- If there is any immediate danger, act straight away. Contact the police & health services.

Do not

- Allow your shock or distaste to show.
- Ask leading questions, make assumptions/judgements, or speculate.
- Make negative comments about the alleged abuser or anyone.
- Make promises you cannot keep or agree to keep the information secret.
- Take your own action. Stick to this procedure.

Appendix 1 continued: The LEAH Traffic Light Tool

Low vulnerability	Medium Vulnerability	High Vulnerability
POTENTIAL INDICATORS		
• May be socially isolated but has some friends or family nearby. • Able to leave the home independently. • Stable domestic arrangements (housing, finance, family structure)	• Anxiety about leaving the house • May have mental health needs but engaged with services/stable and able to function within limits • Anxious/finds it hard to stay on topic • History of domestic abuse, MDS or trafficking • Lack of appropriate clothing • May be a child in home recognised by social services as a 'child in need'	• Adult mental health crisis e.g. can't stop crying, extremely agitated (can't sit still), poor self- care, talk of self-harm • Children in acute crisis e.g. overtly distressed, rejecting of parent, unable to be reassured, appears neglected • Child in home on child protection plan • Disclosure of abuse or recent incident of domestic violence • Unexplained or oddly explained injuries • Evidence of substance abuse • Crisis in home environment e.g. imminent eviction, lack of service, no bedding or food.
ACTIONS		
• Continue ESOL support as normal • Talk through any concerns with your LEAH coordinator	• Volunteer will be briefed about the beneficiary's situation when you are paired • If anyone notices any changes, clarify levels of concern by asking client about their difficulties and what would help • Volunteer will discuss any changes or concerns with your LEAH coordinator who will: • Coordinator will discuss with their line manager.	• Complete safeguarding model on Lamplight, details of which will automatically be sent to DSL • Let client know you will be making this report, unless this may increase risk to client or child, or cause undue delay • Head of Charity will contact Single Point of Access? or Adult Safeguarding team • Where a client's child or a child in their home is on the child protection plan, your LEAH Coordinator will contact you fortnightly to review the case (or as appropriate).

Appendix 2: Code of Good Conduct

This Code has been developed to provide advice that will help to protect children and adults at risk of harm. It will also help you and your colleagues identify any practices which could be mistakenly interpreted and perhaps lead to false allegations of abuse. It is always important that firm appropriate boundaries are adhered to. Politeness and helpfulness in your role are good things, over familiarity is not.

- Do not engage in, or allow any sexually provocative games, involving or observed by children or adults at risk of harm, whether based on talking or touching.
- Do not become friends with a child or adult at risk of harm, always keep the relationship professional.
- Never make suggestive remarks or discriminatory comments
- Never take photographs of a child without the explicit consent of a parent or appropriate adult, or of adults at risk of harm without their explicit consent
- Do not engage in or tolerate any bullying of a child or adult, either by other children, adults at risk of harm, or other people. Report the bullying to the Head of Charity.
- Do not engage in or tolerate inappropriate physical activity involving children and adults.
- Respect all individuals, regardless of their age, gender, ethnicity, disability or sexual identity.
- Never trivialise abuse.
- Never let allegations by a child or adult go unreported, including any made against you

There is always a commitment to work in partnership with parents/carers where there are concerns about their children or adults in their care. However, if you believe the parent/carer may be engaging in abuse, do not say anything to them that might put the child or adult at greater risk. Use the procedure to report your concerns.

I confirm that I have read LEAH's policy on Safeguarding Children and Vulnerable Adults at Risk; and that I will adhere to this Code of Good Conduct.

Signed…… Date…….

Appendix 3: Local Authority safeguarding contacts

Merton

1. Adults

To report a concern about an adult you can fill in a referral form:

Safeguarding adults referral form

Concerns can also be reported by calling:

First Response Team **-** 020 8545 4388 (9am to 1.30 pm, excluding bank holidays)

The Crisis Line - 07903 235 382 (1.30pm to 5pm Monday to Friday)

Emergency Duty Team (Out of Hours – after 5pm and bank holidays)
020 8770 5000 or 0345 6189762

Email: safeguarding.adults@merton.gov.uk

2. Children

Monday to Friday 9.00am – 5.00pm - Children and Families Hub: 020 8545 4226/4227

Email (general enquiries): candfhub@merton.gov.uk

Out-of-hours emergencies (evenings and weekends) - Emergency Duty Team 020 8770 5000

Kingston

1. Adults

Call the Access and Safeguarding Team • between 9.00am - 5.00pm on 020 8547 5005.

After 5pm, call 020 8770 5000

2. Children

Contact the Single Point of Access Team (SPA):

0208 547 5008 between 8:00am - 5:15pm, Monday - Thursday, and Friday between 8:00am - 5:00pm

Or call the out of hours duty team (evenings and weekends) - as above

Richmond

1. Adults

Report concerns by completing this **online form**.

Or Telephone: 020 8891 7971
Or email: adultsocialcare@richmond.gov.uk

For immediate assistance, call 020 8891 7999

2. Children

Contact the Single Point of Access (SPA) at 020 8547 5008 (8am to 5.15pm, Monday to Thursday, and 8am to 5pm on Friday). Out of hours, call:

020 8770 5000.

Complete the Single Point of Access online referral form:

Make a referral to the Single Point of Access - London Borough of Richmond upon Thames

Emergency Duty Team: For urgent concerns outside of office hours call 01344 351999.

Hounslow

1. Adults

Email: adultsocialcare@hounslow.gov.uk

Phone: 020 8583 3100 (Monday to Thursday 9am to 5pm, Friday 9am to 4.45pm)

Out-of-hours emergency, contact the Emergency Duty Team - 0208 583 2222

2. Children

Contact the Hounslow Council's children's social care team: 020 8583 6600, selecting option 2, then option 3. The line is open Monday to

Friday from 9am to 5pm. Outside these hours, you call 020 8583 2222.

London Borough of Hounslow