



# Safeguarding & Prevent Policy

Version: 6

Date: 2025-2026

Protected

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| Policy Lead/ Author + Job Title:   | Claire Penny - Designated Safeguarding Officer<br>Daisy Dady – Deputy Designated Safeguarding Officer |
| Company Lead (if different to above)   |   |
| Priority Level:<br>Red - within 1 year; Amber – within 2 years; green - within 3 years | <b>Red</b>  |
| Review Date:   | <b>Review due: December 2026</b>  |
| Whom applicable to:  | All The Social Action Hub Staff, volunteers and subcontractors  |

**Approval of policy (including revisions if required)**

| Name         | Position | Signature (if required) | Policy Version No. | Date       |
|--------------|----------|-------------------------|--------------------|------------|
| Claire Penny | CEO      | N/A                     | 2019 – V2          | 08.04.2019 |
| Claire Penny | CEO      | N/A                     | 2019 – V3          | 6.11.19    |
| Claire Penny | CEO      | N/A                     | 2020– V3           | 29.01.20   |
| Claire Penny | CEO      | N/A                     | 2020– V4           | 29.01.21   |
| Claire Penny | CEO      | N/A                     | 2024 – V5          | 23.01.24   |
| Claire Penny | CEO      | N/A                     | 2025 – V6          | 8.07.25    |

All policies are located in the policy zone of the intranet.

**Policy: Revision History and distribution**

| Policy Version No. | Date – revision/ distribution | Summary: Revisions and distribution   | Updated by – initials |
|--------------------|-------------------------------|---|-----------------------|
| 2019 V2            | 08.01.2019                    | Formal Review and contact changes   | CP                    |
| 2019 V3            | 29.10.2019                    | Review and Changes to reflect local policy  | EJG                   |
| 2020 V3            | 29.01. 20                     | Reviewed and no changes required  | CP                    |
| 2020 V4            | 29.01. 21                     | Reviewed and no changes required  | CP                    |
| 2023 V4            | 19.01.23                      | Added Social Media & Internet Use Policy in, changed some contact details. Changed from 2yrs to 1yr | DD                    |
| 2024 V5            | 23.01.24                      | Added clauses under definition and added in Contact details.  | DD                    |
| 2025 V6            | 31.06.25                      | Added deputy policy lead/designated SO/Conflict of Interest   | CP                    |
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## 1. Safeguarding & Prevent Context/Policy Statement

- 1.1. **For information:** The Social Action Hub – which we'll refer to as 'The Social Action Hub' in this policy – is made up of a number of related projects, The Community Learning College, The Tree House Project, The Social Supermarket. To keep things simple throughout this document, 'we' and 'us' means the Group and its projects.
- 1.2. This policy statement outlines The Social Action Hub values, commitment and role in safeguarding and promoting the welfare of children, young people and adults at risk. The aim of the policy is ensure the safety and protection of all service users by ensuring that all our staff and volunteers are clear about their responsibilities and act promptly when dealing with allegations or suspicions of abuse or neglect.
- 1.3. To protect and safeguard young children and families deemed at risk of radicalisation with the intent to prevent from being drawn into terrorism.
- 1.4. This Policy is intended to serve as a guidance for Managers and Practitioners to recognise the signs of those who are at risk and also to inform parents of our legal requirement to put this policy into operation.
- 1.5. The prevent of duty care policy is part of our wider safeguarding duties in keeping children safe from harm, and this new policy reinforces our existing duties by spreading understanding of the prevention of radicalisation

## 2. Overall Aim and Objectives

- 2.1. **SAFEGUARDING IS EVERYBODY'S Responsibility.** We will work together to prevent and minimise abuse. If we have concerns that someone is being abused our loyalty to the person at risk comes first.
- 2.2. **DOING NOTHING IS NOT AN OPTION** – If we know or suspect that a person is being abused, we will do something about it, we will report it to the relevant authority.
- 2.3. This policy and associated procedures set out measures that have been put in place by The Social Action Hub to minimise the risk of harm to all service users. It includes our role within Prevent which is to challenge and support service users who are vulnerable to radicalisation.
- 2.4. This policy applies to all staff and volunteers who may be working at any time on any contract with any service user. Service users include children, young people and adults at risk regardless of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity.
- 2.5. It is a requirement for all subcontractors to have their own safeguarding policies and procedures in place and to have due regard of the procedures in this policy depending on the contract they are delivering on behalf of The Social Action Hub. Specific safeguarding requirements will be written into individual contracts with subcontractors where applicable e.g. In Custody provision. Subcontractors not adhering to safeguarding practices and principles included in their contracts will be in breach and contracts will be withdrawn. Failure to comply with the policy will result in an investigation and the company disciplinary procedures being instigated against staff if there has been a breach.

2.6. This policy has utilised best practice safeguarding approaches from the legislative requirements and Ofsted common inspection framework. It sets out the definitions of children and adults at risk, infrastructure, roles and specific responsibilities so that The Social Action Hub sets and achieves ambitious targets to promote safeguarding in all areas of our work.

### **3. Definitions**

3.1. These procedures apply to:

- a) All children under 18
- b) Unborn children who may be at risk of harm at birth
- c) Vulnerable adults who fall within The Social Action Hub remit
- d) Vulnerable children who are in care or being looked after
- e) Any young person or adult who has shown vulnerability to radicalisation

#### **Adults at risk**

3.2. An adult at risk of abuse or neglect is defined as someone who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs - is unable to protect themselves. Please note the reference above regarding radicalisation

3.3. An adult at risk may be classified as follows:

- a) A person aged 18+ who is or may be in need of community care services by reason of learning, physical or mental disability, age or illness
- b) A person who may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation

3.4. An adult at risk may be a person who:

- a) Is elderly and frail
- b) Is physically frail or has a chronic illness
- c) Has a physical or sensory disability
- d) Has a mental illness or dementia
- e) Has a learning disability
- f) Misuses drugs or alcohol
- g) Has social or emotional problems
- h) Exhibits challenging behaviour
- i) Is a victim of domestic violence
- j) Is being bullied
- k) Lives in residential accommodation or sheltered housing
- l) Is detained in lawful custody
- m) May be at risk of radicalisation

3.5. Types of Abuse may include (but may not be restricted to):

- a) Physical abuse – Including assault, hitting slapping, pushing, kicking, shaking, inappropriate physical sanctions
- b) Domestic Violence – Including psychological, physical, sexual, financial, emotional abuse, so called 'honour' based violence
- c) Sexual abuse - Including rape, attempted rape, indecent exposure, sexual assault, harassment, inappropriate touching, non-contact abuse, internet grooming, sexual teasing or innuendo, sexual photography, subjection to pornography, sexual acts to which the person has not consented or was pressured into consenting
- d) Emotional/Psychological e.g. fear, humiliation, ridicule, forced marriage, threats of punishment, intimidation , coercion, verbal abuse, cyber bullying

- e) Financial or material abuse - . theft of money, misuse of money, fraud, extortion, internet scamming
  - f) Neglect and acts of omission - failure to keep the person clean, warm, provide reasonable care, give prescription medication
  - g) Self-neglect - This covers a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding
  - h) Discrimination - Racial harassment, gender, sexual orientation, insults based on a person's age, race, disability, gender, gender identity, religion or sexuality
  - i) Modern slavery – Encompasses slavery, human trafficking, forced labour and domestic servitude.
  - j) Organisational Abuse – Including neglect and poor care practice within an institution or specific care setting, or in relation to care provided on one's own home.
  - k) Encouraging and grooming for radicalisation and terrorism (Prevent)
- 3.6. In respect of safeguarding individuals from radicalisation The Social Action Hub works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for customers through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others. See the organisations Prevent Policy for more information.
- 3.7. For more information about support agencies and definitions etc. please refer to Safeguarding Resources in the Safeguarding section of Policies Zone on the Intranet.

#### **4. Roles, Responsibilities and Structure**

- 4.1. This section sets out the roles and responsibilities of staff in responding to safeguarding issues and the infrastructure (including CPD) in place to ensure staff are supported in their role.
- 4.2. All staff delivering services to our customers have a responsibility under the Children Act, Safeguarding Vulnerable Groups Act and Prevent Duty, to safeguard and promote the welfare of all customers.
- 4.3. All practitioners must be able to identify children and adults who may be vulnerable to radicalisation.
- 4.4. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology, but staff should be alert to changes in children or adults behaviour, including even very young children, which could indicate they may be in need of help or protection.
- 4.5. These behaviours can be evident during circle time, Role play activities and quiet times. Quiet times is a good time for children to make disclosures as this is the period that children are closest to their key persons.
- 4.6. People from any walks of life can be drawn into radicalisation and not necessarily from a religion or ethnicity. Terrorism is not promoted by any religion.
- 4.7. The Prevent duty does not require care providers to carry out unnecessary intrusion into family life but we are required to take action when observe behaviour of concern.

- 4.8. There are certain terminology used by Muslim families such as, Inshallah, alhumdillah, marshallah, allah ho akbar. These phrases are not an indication of any form of radicalisation. (This is worth mentioning as it is one of the concerns from the muslim community).
- 4.9. People dress codes like hijabs, nikabs, abayas and jilbabs are not indicative factors that they are at risk of being radicalised
- 4.10. Staff also have a duty to safeguard each other, challenge unacceptable behaviours, and have regard for the health and safety of themselves and others. Therefore, as a company we will
- a) Ensure that safeguarding and our prevent duty underpins the way that we organise, deliver and manage services
  - b) Raise the awareness and knowledge of staff about the importance of safeguarding & prevent
  - c) Ensure that staff know what action to take if concerns arise
  - d) Create a climate that will enable service users and staff to raise any safeguarding issues they have concerning colleagues/staff
  - e) Ensure our service users know how to make a complaint
  - f) Share information and refer concerns to appropriate agencies if there is a risk of harm
  - g) Ensure that there are trained staff and/or managers (designated people responsible for dealing with allegations or suspicions.)
  - h) Exemplify British Values in everything we do i.e. democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.
- 4.11. As a company we are totally committed to the Governments Prevent Strategy and will do all we can to identify customers who may be vulnerable to radicalisation and build resilience to radicalisation by promoting fundamental British Values and challenge extremist behaviour.

### **Designated Staff with Responsibility for Safeguarding and Best Practice**

- 4.5. The Social Action Hub is committed to the principle of multi-agency working in order to safeguard young people and adults at risk. All senior managers must work proactively to ensure we are fully aware of and involved in local reporting procedures and attend training and updates in safeguarding procedures delivered by the local authority.
- a) The Social Action Hub Designated Strategic lead for Safeguarding – Claire Penny, Chief Executive Officer/Chair of Trustees and Deputy Safeguarding Lead – Daisy Dady
- |   |                                       |
|---|---------------------------------------|
| CP: Tel: 01623 490498                   | DD: Tel: 01623 490498                 |
| Mob: 07709353071                        | Mob: 07                               |
| Email: Claire.Penny@socialactionhub.com | Email: Daisy.Dady@socialactionhub.com |
- b) Key duty to take a lead responsibility for raising awareness within the staff of issues relating to the promotion of a safe environment of The Social Action Hub service users and staff. Provides reports to the Board on how The Social Action Hub discharges its duty with regards to safeguarding, reporting deficiencies in procedure or policy and reporting of major concerns and referrals. In a conflict of interest situation the Chair of the Trustees and the Programme Manager will be designated DSL and Deputy DSL Respectively.
- c) Providing advice on Safeguarding policy and procedures. A visual copy of the Safeguarding Policy, the green card containing signs of abuse, the Pathway to Provision document and MASH contact details are present for all staff and volunteers to access in centre and on the charities intranet. Maintaining a proper record of any protection referral, complaint or concern (even where that concern does not lead to a referral).

- d) Ensure that all staff and volunteers are aware of The Social Action Hub Safeguarding Policy and Procedures and who the designated safeguarding lead is.
- e) Overseeing the referral of cases of suspected abuse/radicalisation allegations to the Multi Agency safeguarding Team (MASH). Providing advice and support to other staff on issues relating to child/adults at risk protection. Liaising with the Children and Young People's Services Department of the Local Authority, the Local Safeguarding Children's Board and other appropriate agencies. Attending case conferences where necessary.
- f) Ensuring that all staff and volunteers working with young people receive basic training in child protection/adults at risk issues and are aware of The Social Action Hub protection procedures. Responsibility for the company procedures on staff recruitment and vetting. Responsibility for investigation of staff allegations and where required reporting to LADO within the local authority.

4.6 The Referrer is the person in the organisation who is responsible for referring to the Multi Agency Safeguarding Team (MASH)

The referrer is responsible for deciding as to whether they believe there is an allegation of abuse. The referrer must use the threshold criteria and assessment framework outlined in the Pathway to Provision document to help them decide if a referral needs to be made.

At The Social Action Hub, the role of the referrer is usually the Line Manager. The following principles apply to this role:

- The Line Manager will be the first point of reference for staff in the team
- Line Managers need to be fully aware of procedures, and to ensure their staff are aware of procedures
- Line Managers have the responsibility to ensure that the procedures are being followed in individual cases, cases are clearly and thoroughly recorded and staff are supported throughout the process
- Line Managers should offer the external counselling service to staff who have had a particularly disturbing disclosure (for information contact the Chair of Trustees)
- If the Line Manager feels the procedures have not covered a particular case, or feel that other changes need to be made then this should be passed on to the Designated Safeguarding Officer

**Alerter**

- 4.7. The person who alerts the Referrer. Alerters are usually front line staff including Playworkers, Volunteers, Youth Workers, Community Workers, Administrative Workers and have a responsibility for the identification and reporting of abuse and for safeguarding the welfare of customers.
- 4.8. Alerters can seek advice and support from the Line Manager or Designated Safeguarding Officer especially with regard to consent and referral issues. If the Line Manager is not available or is unable to provide the required information, staff can contact the relevant Senior Manager for support
- 4.9. Any of The Social Action Hub staff who have a concern that a child, young person or adults is at risk of significant harm, abuse or neglect must take the role of 'Alerters' under the procedure for safeguarding service users

- 4.10. Note that if the member of staff has a significant or immediate concern in line with the Prevent Statutory requirement they must take on the role of referrer and immediately contact the Police on 101 or the terrorist hotline on 0800 789321**

### **Subcontractors**

- 4.11. There are clear procedures for Safeguarding which need to be followed (see company intranet and extranet – for external staff and subcontractors). Subcontractors should have their own policy and procedures to safeguard customers, however, they should be in line with the The Social Action Hub policy and procedures as stated in their contract. All subcontractors are also required to provide evidence to The Social Action Hub regarding the safe vetting of staff who are working on The Social Action Hub contracts, together with safeguarding risk assessments of customers and the service they provide.

## **5. Safeguarding & Prevent Procedures**

- 5.1. There are clear processes in place to recognise, respond, record and report safeguarding and concerns. Additional information to support the process includes links to further guidance and resources for external agencies. All staff must be aware and follow the company safeguarding procedures which are available in printed format in the staff office and internal intranet under Safeguarding and Prevent. Additional procedures to consider are;
- a) Safeguarding Procedure
  - b) Pathway To Provision
  - c) Reporting a Concern/Safeguarding report
  - d) Allegations of Abuse Against Staff Policy and Complaints Log

## **6. Safeguarding Training and continuous professional development**

- 6.1. All staff and volunteers will receive training on company policies and procedures relating to safeguarding and will be made aware of the local safeguarding arrangements as part of the company induction.
- 6.2. All staff will be required to undertake Safeguarding training depending on their role as part of their induction with a refresher undertaken every three years. This includes all managers who are involved in managing teams who are customer facing.
- 6.3. All operational staff will also be required to undertake Government Side by Side Prevent duty training with modules on Radicalisation and Extremism, Staying Safe Online, What can you Trust and British Values to enable staff to be able to identify possible signs of radicalisation and how to protect themselves from potential online grooming
- 6.4. All staff will receive regular updates on local arrangements via the intranet or through staff meetings and have the opportunity to discuss case studies during team meetings
- 6.5. Managers and those responsible for referrals will receive training on the application of the Company's policy and procedures, understand how referrals are made, be familiar with the requisite record keeping procedures and undertake safeguarding training at the appropriate level.

6.6. CEO, Board and designated offices will undertake training commensurate with the role in safeguarding in relation to the company

## **7. Recruitment and Selection Procedures**

7.1. The Social Action Hub has written recruitment and selection procedures which can be found on the Intranet. The policy and procedures are designed with the aim of safe recruitment and vetting of staff. Key Aspects are as follows

- a) Applicants are made aware that our positions are exempt from the provision of the Rehabilitation of Offenders Act (1974)
- b) Job descriptions are available for all roles, all jobs contain responsibility for safeguarding
- c) Person specification setting out the key selection criteria for all roles
- d) Explanations at Interview will be sought for gaps in employment or rapid moves from one job to another
- e) A requirement for two references and evidence of qualifications
- f) All staff will work a pre-agreed probationary period
- g) A statement on obtaining satisfactory Disclosure and Barring Service disclosure and barred list check for appropriate positions as a condition of employment.

## **8. Policy Monitoring and Evaluation**

8.1. The Designated Persons and Operations Managers will conduct an annual review of our Safeguarding systems and Policies. This will include consideration of specific cases dealt with by staff in the last year. The resulting information, including feedback from staff, will be used by the designated person to inform any improvements necessary. Quarterly Safeguarding reports will be reviewed at The Social Action Hub Board level.

8.2. The Social Action Hub Safeguarding Policy and procedures will be clearly communicated to staff, volunteers, subcontractors, Board Members and Service Users through the use of the company intranet and visually in the building, through team meetings, staff supervisions and emails. The Designated Safeguarding Officer: Policy and Procedures named person will be responsible for ensuring this is done.

## **9. Contact Details for further support and advice**

- Claire Penny (Safeguarding Officer and Chair of Trustees) 07709353071  
[claire.penny@socialactionhub.com](mailto:claire.penny@socialactionhub.com)
- Local Authority Designated Officer (LADO) 01709 336080
- MASH (Multi-Agency Safeguarding Hub) 0300 500 8090 for children who live in Nottinghamshire.
- Children and Families Direct 0115 8764800 for children who live in Nottingham City.
- Nottingham Police (Child Abuse Investigation Unit) 999
- City Emergency Duty Team 0300 456 4546
- NSPCC Free Advice Helpline (open 24/7) 0808 800 5000
- Adult Social Services Team

## **10. List of Related Strategies, Policies and Procedures**

10.1 The policy should be read in conjunction with related strategies, policies and procedures (all located in the Policy Zone or available in the Handbook)

- a) Pathway to Provisions
- b) Safeguarding & Prevent Procedure
- c) Managing allegations of abuse against staff Policy
- d) The Social Action Hub Online Safety Policy
- e) Harassment and bullying Policy
- f) HR policies/handbook on Safer Recruitment, Disclosure and Barring Service Checks, Ex-Offender, staff allegations, Whistleblowing, prayer room policy.
- g) CPD Policy and Training Plan
- h) Commissioning and procurement Policy
- i) GDPR and data security Policy
- j) Data Protection Policy
- k) Equality and Diversity Policy
- l) Health and Safety Policy
- m) Events Policy
- n) Terrorism Policy
- g) Complaints Policy and Procedures.
- h) Social Media & Internet Use Policy

## **11. Legal framework**

Primary legislation § Children Act § Protection of Children Act (1999) § Data Protection Act (1998)  
§ The Children Act (Every Child Matters) (2004) § Safeguarding Vulnerable Groups Act (2006)

Secondary legislation § Sexual Offences Act (2003) § Criminal Justice and Court Services Act (2000) § Equalities Act (2010) § Data Protection Act (1998) Non Statutory Guidance