



Safeguarding Children and Adults Policy

Version Control - Approval and Review

Version No	Approved By	Approval Date	Main Changes	Review Period
1.0	Board	20/03/2026	Initial draft approved	Annually

1. Purpose

The purpose of this policy is to set out how Free to Fly safeguards and promotes the welfare of children, young people, and adults at risk who engage with our services. Safeguarding is not an isolated activity; it is a fundamental part of our culture, values, and daily practice. This policy ensures that everyone connected to Free to Fly understands their safeguarding responsibilities, recognises signs of abuse or neglect, and knows how to respond appropriately, proportionately, and confidently.

Free to Fly is a specialist service supporting expectant mothers to leave relationships where they are experiencing domestic abuse, in order to protect both themselves and their unborn babies. As a result of the nature of our work, the individuals we support are likely to be experiencing heightened vulnerability, trauma, coercive control, financial hardship, housing insecurity, and increased risk of harm.

Those we work with generally are considered to be at high risk, given that pregnancy combined with domestic abuse represents a high-risk safeguarding situation. Safeguarding is therefore central to all of our services and decision making.

We provide a range of services including:

- Awareness raising and education
- Practical aid and support including hardship/aid packages and accommodation
- Befriending, emotional support and mentoring
- Advocacy

Safeguarding is embedded into every aspect of our work, from frontline service delivery to governance, leadership, and strategic planning.

2. Applicability

This policy applies to all staff, volunteers, trustees, contractors, and anyone working on behalf of or representing Free to Fly.

We are committed to identifying and responding safely to any safeguarding concerns relating to:

- Unborn babies, children and young people under the age of 18
- Adults at risk, as defined by the Care Act 2014.

Relevant Legislation:

This policy is informed by and complies with relevant UK legislation, statutory guidance, and local safeguarding arrangements, including but not limited to:

- Children Act 1989 and Children Act 2004
- Working Together to Safeguard Children (2023)
- Care Act 2014
- Mental Capacity Act 2005
- Domestic Abuse Act 2021
- Human Rights Act 1998
- Equality Act 2010
- Local Safeguarding Children Partnerships and Safeguarding Adults Boards procedures across Hampshire.

Unborn Babies and Children:

For the purposes of this policy, a child is defined as any person who has not yet reached their 18th birthday. This definition is consistent with the Children Act 1989 and the statutory safeguarding guidance Working Together to Safeguard Children.

Safeguarding responsibilities apply to all children regardless of gender, ethnicity, disability, religion, sexual orientation, or background.

Safeguarding responsibilities may also arise before a child is born. Concerns about the welfare of an unborn baby may occur where there are indicators that the baby, once born, may be at risk of significant harm. In such circumstances, safeguarding concerns should be shared with appropriate statutory services in line with local safeguarding procedures so that assessment and support can begin at the earliest possible stage.

Where safeguarding concerns relate to a child or unborn baby, the organisation will follow relevant child protection procedures and work in partnership with statutory agencies, including children's social care and other safeguarding partners, to promote the safety and welfare of the child.

Adults at Risk:

At present, we predominantly operate in England, and as such the most relevant definition of an "adult at risk" for safeguarding purposes, is that provided under The Care Act 2014, which is the relevant law for England, which says that an adult at risk is a person aged 18 or over who:

- Has needs for care and support (whether or not these are being met by the local authority), **and**
- Is experiencing, or is at risk of, abuse or neglect, **and**
- Is unable to protect themselves from the abuse or neglect because of their care and support needs.

Care Leavers:

Free to Fly recognises that some of the individuals who access our services may be care leavers.

In England, a care leaver is generally defined as a young person aged 18–25 who has previously been looked after by a local authority, as set out in the Children Act 1989, the Children (Leaving Care) Act 2000 and the Children and Social Work Act 2017.

Care leavers are legally adults once they reach the age of 18. As an organisation, our service users are adults. As such, our safeguarding responses relating to care leavers will fall under adult safeguarding.

We recognise that individuals leaving care may face particular challenges during their transition to independent adulthood. These may include limited family or support networks, housing instability, financial hardship, mental health difficulties, or increased risk of exploitation. For this reason, care leavers may experience heightened vulnerability and may require additional safeguarding awareness and support.

Care leavers are not automatically considered adults at risk. However, some care leavers may meet this definition depending on their circumstances. Where this is the case, safeguarding concerns will be managed in accordance with the organisation's adult safeguarding procedures and relevant statutory guidance.

The organisation is committed to ensuring that staff and volunteers working with care leavers adopt a **trauma-informed, respectful, and empowering approach**, recognising the potential impact of earlier life experiences while also supporting individuals' independence and autonomy.

Where appropriate, the organisation will work in partnership with relevant agencies, including local authority leaving-care services and adult safeguarding teams, to ensure that care leavers are appropriately supported and protected from harm.

3. Principles

Safeguarding is central to the work of Free to Fly and underpins all our services, decision making, and interactions. We recognise that safeguarding is everyone's responsibility and that a strong safeguarding culture requires clear values, shared accountability, and consistent practice.

Safeguarding Children and Unborn Babies

Welfare of the Child is Paramount

The welfare of the child is paramount, in line with the Children Act 1989 and 2004. This

includes unborn babies, children, and young people under the age of 18. All safeguarding decisions and action are made in the child's best interests, with their safety, health, and development as the primary consideration.

We acknowledge that in Hampshire, the Unborn/Newborn baby protocol sets out how to respond to concerns for unborn babies with an emphasis on clear and regular communications between professionals working with the pregnant person and their family where risk is identified. Unlike many safeguarding situations the antenatal period gives a window of opportunity before the baby arrives for practitioners and families to work together to:

- Form relationships
- To identify protective factors as well as risk and vulnerabilities
- To agree a multi-agency safety planning for the unborn / newborn baby.

An unborn baby has no legal standing in the UK.

Law cannot force an expectant person to have any medical intervention at birth unless they lack capacity, which has been assessed in line with the Mental Capacity Act, and if there is an unassisted delivery; the lack of professional involvement may lead to undiagnosed complications which could have serious outcomes for mother and/or baby where medical intervention is judged to be necessary and in the person's best interest. It is only possible to make appropriate contingency plans and to ensure that the individual is fully aware of the consequences of their actions. In all cases, legal advice should be sought.

Where a person is in the third trimester (more than 27 weeks pregnant) and there are concerns about late presentation or lack of engagement, a referral to MASH needs to be considered. Our internal training materials support decision-making with this if you are a member of our staff team.

Prevention

We are committed to preventing harm to children through safe practice, early identification of concerns, and timely intervention. We promote a safeguarding culture in which children are protected from abuse, neglect, exploitation, and harm, and where staff and volunteers are trained to recognise and respond to concerns at the earliest opportunity.

Partnership

We work in partnership with children, families, and relevant statutory and voluntary agencies

to safeguard children effectively. We follow local safeguarding children partnership procedures and share information appropriately to ensure that children receive the protection and support they need.

The Voice of the Child

We recognise the importance of listening to children and taking their views seriously. Children are supported to express their wishes and feelings, and their voices are considered in safeguarding decisions, in line with their age, understanding, and best interests.

Accountability

We ensure that safeguarding concerns relating to children are recorded accurately, reported promptly, and managed in accordance with statutory guidance and organisational procedures. Clear lines of accountability and governance arrangements support effective oversight of safeguarding practice.

Safeguarding Adults at Risk

Promoting Wellbeing and Safety

We are committed to promoting the wellbeing, safety, and rights of adults at risk, as defined by the Care Act 2014. Safeguarding adults means protecting a person's right to live in safety, free from abuse and neglect, while also respecting their independence and autonomy where possible.

Prevention

We aim to prevent harm to adults at risk by identifying safeguarding concerns early, providing appropriate support, and reducing risks through safe practice. We recognise that adults receiving support through Free to Fly have experienced abuse in the context of domestic abuse, but also could have experienced FGM, exploitation, isolation, stalking and harassment, suicidal ideation, use of substances, child abuse, and we must respond with a trauma-informed and person-centred approach.

We also acknowledge that there may be a high level of vulnerability and risk of further abuse, and we must ensure Free to Fly colleagues and volunteers do not present a risk to these adults.

We aim to ensure that we respond appropriately to all safeguarding concerns, whether the risk is presented by a member of our team, others beyond our organisation, or by the adults at risk who may be putting themselves at risk and their mental capacity is in question.

Partnership

We work in partnership with adults at risk and with statutory agencies, including adult social care, health services, and the police. We follow local safeguarding adults board procedures that share information appropriately to support effective safeguarding responses.

Empowerment

We support adults at risk to make informed choices and to be involved in decisions about their own safety and wellbeing. Where an adult has capacity, their views, wishes, and consent is central to safeguarding responses. Where capacity is in question, we act in accordance with the Mental Capacity Act 2005.

Accountability

Safeguarding adults' concerns are taken seriously, recorded accurately, and reported in line with Free to Fly procedures, and local procedures. We ensure clear accountability, reflective practice, and ongoing learning to improve safeguarding outcomes.

4. Types of Abuse

Abuse can take many forms, and individuals may experience multiple types of abuse at the same time. Recognising the range and impact of abuse is essential to effective safeguarding practice.

Abuse Relating to Children and Unborn Babies

Children and unborn babies may experience abuse or neglect in a range of ways, including:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Unborn babies can also experience abuse and risk from parental harms such as domestic abuse, alcohol and substance use, neglect of physical health including malnourishment, severe mental ill health, learning disability, history of previous child removal, and concealed pregnancies. Please see Appendix A for more information.

We acknowledge that concerns may exist regarding the mother's ability to protect and/or

abuse is thought to be affecting the health of the unborn baby.

Children may also be at risk of, or exposed to, specific safeguarding concerns such as:

- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Online abuse
- Child-on-child abuse
- Female genital mutilation (FGM)
- Forced marriage and other forms of so-called “honour-based abuse”
- Domestic abuse within the family
- Fabricated or induced illness.

Also, if expectant parents are themselves deemed as children/ young people (under the age of 18yrs), there are additional considerations.

We primarily work with those aged 18 and over, so these considerations do not predominantly apply to our work, however in the event that a referral is made inappropriately to us, or an individual self-refers who is under the age of 18, these considerations must be kept in mind and appropriately responded to, to ensure the safety of parent/s and unborn:

- Where expectant parents are under the age of thirteen, a referral regarding expectant parent/s and unborn baby must be submitted immediately.
- Where a previous child in the family has been removed because they have suffered harm or been at risk of significant harm. However, referrals for second or subsequent unborn babies (with siblings who are already living at home) only need to be made where concerns exist that another child in the home may increase risk of harm.
- Where the expectant parents are currently open to Social Care and/or they have children who are currently active to Social Care, a referral is needed.
- Where a previous child/children have experienced neglect, emotional, physical or sexual abuse and these concerns continue to be evident and would impact on the unborn baby in pregnancy and once born by virtue of the child being dependant on their caregiver, a referral is needed.
- Where a person who has been convicted of an offence against a child or is believed by professionals to have abused a child, has joined the family, a referral is needed.

- Where there are professional concerns regarding parenting capacity, particularly where the parents have either severe mental health problems or learning disabilities, a referral is needed.
- Where the child is believed to be at risk of significant harm due to domestic abuse, a referral is needed.

Referrals are to be made in relation to the above to the local MASH, in accordance with our organisational procedures and local safeguarding processes. Details of the local MASH may be found below in Section 5 of this policy.

Abuse Relating to Adults at Risk

Adults at risk may experience abuse or neglect in a variety of settings, including their own homes, supported accommodation, or the wider community. Abuse may include:

- Physical abuse
- Emotional or psychological abuse
- Sexual abuse
- Neglect or acts of omission
- Financial or economic abuse
- Domestic abuse
- Modern slavery
- Organisational abuse
- Self-neglect
- Discriminatory abuse.

Abuse may be perpetrated by family members, intimate partners, carers, professionals, or members of the community.

Please see Appendix A for a comprehensive list of definitions.

Key Risks Relevant to Free to Fly

Domestic abuse arises from unequal power and control within relationships. It is often rooted in entitlement and can affect individuals across all communities, regardless of age, gender, ethnicity, sexuality, religion, or socio-economic background.

Under the Domestic Abuse Act 2021, domestic abuse occurs where:

- Both individuals are aged 16 or over and are personally connected, and
- The behaviour is abusive

Abusive behaviour includes, but is not limited to:

- Physical abuse
- Sexual abuse
- Psychological or emotional abuse
- Economic abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour

Domestic abuse may consist of a single incident or a pattern of behaviour over time.

Children who see, hear, or otherwise experience the effects of domestic abuse are recognised as victims in their own right. This includes unborn babies, who may be at increased risk due to violence, maternal stress, or neglect during pregnancy. Children affected by domestic abuse may require safeguarding intervention and access to appropriate support services.

Domestic abuse may also be experienced by a parent or carer at the hands of a child or young person, and such situations will be managed in line with safeguarding procedures.

Given the nature of our work at Free to Fly, we are particularly alert to safeguarding risks associated with:

- Homelessness and housing insecurity
- Mental health crises, including suicidal ideation
- Financial exploitation and economic abuse
- Potential risk of homicide/physical harm posed to expectant mothers who leave abuse during pregnancy just by virtue of them having left or planning to leave
- Digital coercion and online control
- Social isolation
- Dependency on staff or volunteers
- Vulnerability due to care leaver status, trafficking and modern slavery, asylum seeking/refugee status, visa status and lack of English as a spoken language

Staff and volunteers are expected to remain vigilant to these risks and to respond appropriately in line with this policy and safeguarding procedures.

We also recognise that perpetrators of abuse may themselves be children or adults at risk and this creates complexity when considering a safeguarding response. Staff and volunteers must ensure they respond to all safeguarding concerns in line with this policy and our safeguarding procedures.

5. Reporting Concerns

Listening and Responding

Safeguarding concerns must always be taken seriously. No concern is too small, and no staff member should ever feel they must decide alone whether something constitutes abuse.

Staff and volunteers must:

- Listen carefully and reassure the individual
- Avoid making promises of confidentiality
- Record concerns accurately and promptly
- Report concerns immediately in line with organisational procedures.

Immediate Danger

If a child or adult is in immediate danger, emergency services must be contacted without delay by calling 999.

Internal Reporting

All safeguarding concerns must be reported to the Designated Safeguarding Lead (DSL) on the same day they arise. You must record concerns factually, using the individual's own words wherever possible, and avoid assumptions or personal interpretations. The DSL will assess the information, determine the level of risk, and decide on the appropriate course of action.

You must report your concerns using our safeguarding form, which is also available in the public domain via our website: www.freetofly.org.uk and you must also alert the DSL directly by telephone.

External Reporting

Depending on the nature of the concern, the DSL may refer the matter to Children's Social Care, Adult Social Care, the Police, other domestic abuse services, or other relevant agencies. We work in partnership with local safeguarding bodies to ensure concerns are

addressed promptly and effectively.

In the event of a serious incident, which is defined as “an adverse event, whether actual or alleged, which results in or risks significant harm to (your) charity’s beneficiaries, staff, volunteers, or others who come into contact with (our) charity through its work”, there is a responsibility to report this to the Charity Commission promptly. The responsibility to report to the Charity Commission rests with the Trustees, although they may delegate this to the DSL at their discretion. Guidance on when to report, and how to report, including what to provide, may be found [here](#).

Reporting Serious Wrongdoing as a Worker or Volunteer

If something has happened, is happening, or is likely to happen, and could seriously harm the people our charity helps, our staff or volunteers, this should ideally be reported internally. However you can report this to the Charity Commission under their whistleblowing procedures. Information on how to do this can be found [here](#).

Consent and Capacity

For children, consent is not required to make a safeguarding referral. For adults, decisions must be guided by the Mental Capacity Act 2005.

Adults have the right to refuse support unless they lack capacity, others are at risk, a crime has been committed, or coercion is suspected.

Allegations Against Staff or People in Positions of Trust

Any allegation or concern involving a member of staff, volunteer, trustee, or contractor must be reported immediately to the DSL and senior leadership.

This report can be made via our safeguarding referral form on our website:

www.freetofly.org.uk, which notifies our DSL via email, however we also ask you to contact the DSL directly.

Concerns involving children will be referred to the Local Authority Designated Officer (LADO).

Concerns involving adults will be referred through the People in Positions of Trust (PIPOT) process. Staff must not investigate allegations themselves.

The PiPoT framework is used when there is an allegation that a person, whether paid or voluntary, has behaved in a way that suggests they may pose a risk to adults with care and

support needs. This includes actions that have harmed or may harm an adult, potential criminal offenses, or behaviour indicating they are unsuitable to work with this group.

Any concerns should be referred to adult social care safeguarding team as per the contacts below as a normal safeguarding adults referral, quoting a reference to PiPoT.

Our Designated Safeguarding Lead (DSL)

As a charity, our Designated Safeguarding Lead (DSL) is Nicola Tapley, who is our Chair of Trustees. Please contact the DSL on 03300 573273 where there is an allegation against a staff member of a Person in Positions of Trust and/or if you are a member of Free to Fly team (whether voluntary or paid).

Please email safeguarding@freetofly.org.uk which is an inbox managed specifically by our DSL if you wish to follow up a safeguarding concern that you have raised via telephone and/or via our online reporting form..

External Key Contacts:

Portsmouth Safeguarding Teams:

- Email: adultsafeguarding@portsmouthcc.gov.uk , Tel: 02392680810, Out of hours: 03005551373
- Portsmouth Children's MASH: Email: mash@portsmouthcc.gov.uk , Tel: 02392688793, Out of hours: 03005551373
- Portsmouth LADO (Children's Services): Lydia Bowles, Email: Lado@portsmouthcc.gov.uk , Tel: 023 9288 2500

Hampshire Safeguarding Teams:

- Online Referral:
<https://www.hants.gov.uk/socialcareandhealth/adultsocialcare/contact/professional-referral> Tel: 0300 555 1386 during office hours 8:30am to 5pm Monday to Thursday, 8:30am to 4:30pm on Friday, 0300 5551373 at all other times to contact the Out of Hours service.
- Hampshire Children's MASH: Online Referral
<https://childrenandfamiliesportal.hants.gov.uk/s4s/FormDetails/FillForm?formId=279> , Tel: 0300 555 1384 during office hours 8:30am to 5pm Monday to Thursday, 8:30am to 4:30pm on Friday, and 0300 555 1373 at all other times to contact the Out of

Hours service

- Hampshire LADO (Children's Services): Email: LADO@hants.gov.uk , <https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/allegations>

6. Responsibility

Safeguarding is a shared responsibility, and everyone connected to Free to Fly has a role to play in protecting children and adults at risk. While all staff and volunteers have a duty to safeguard, different roles carry different levels of responsibility and accountability.

We are committed to:

- Creating a safe and supportive environment for all children and adults who engage with our services
- Promoting wellbeing, dignity, and respect
- Taking all safeguarding concerns seriously and responding promptly
- Working in partnership with statutory agencies and local safeguarding partnerships
- Ensuring safer recruitment, appropriate supervision, and ongoing safeguarding training.

Safeguarding is everyone's responsibility.

Trustees

Trustees hold ultimate accountability for safeguarding within the organisation. They are responsible for ensuring that:

- Effective safeguarding policies and procedures are in place and kept up to date
- Appropriate systems, resources, and reporting mechanisms support safe practice
- Safeguarding is embedded at a strategic and governance level
- Safeguarding practice and concerns are regularly reviewed and monitored
- Serious safeguarding concerns are appropriately escalated.

Senior Leadership

Senior leaders are responsible for the operational oversight of safeguarding and for creating a culture where safeguarding is prioritised and understood. Their responsibilities include:

- Ensuring safeguarding policies and procedures are implemented in practice
- Making sure staff and volunteers receive appropriate safeguarding training and supervision
- Supporting the Designated Safeguarding Lead (DSL) in managing concerns
- Ensuring concerns are responded to promptly and in line with statutory requirements
- Promoting safe systems of work across all services.

Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead has lead responsibility for safeguarding within the organisation. This includes:

- Providing advice, guidance, and support to staff and volunteers
- Receiving and managing safeguarding concerns and disclosures
- Liaising with statutory agencies and local safeguarding partnerships
- Ensuring safeguarding concerns are recorded, stored, and managed appropriately
- Overseeing safeguarding training and contributing to supervision and learning
- Keeping safeguarding knowledge and practice up to date.

Staff and Volunteers

All staff and volunteers have a responsibility to safeguard children and adults at risk. They must:

- Follow this policy and related safeguarding procedures
- Be alert to signs of abuse, neglect, or exploitation
- Report safeguarding concerns promptly and appropriately
- Maintain professional boundaries and act in a respectful, trauma-informed manner
- Attend required safeguarding training and updates.

Failure to follow safeguarding policy and procedures may result in disciplinary action.

Professional Conduct and People in Positions of Trust

All staff, volunteers, trustees, and anyone working on behalf of Free to Fly are expected to uphold the highest standards of professional conduct at all times. Those in positions of trust have a responsibility to act in a way that protects children and adults at risk from harm and maintains confidence in the organisation.

Professional boundaries must be clear, appropriate, and consistently maintained.

Positions of Trust

A position of trust exists where an individual has power, authority, or influence over a child or adult at risk. This may arise through professional roles, volunteering, befriending, advocacy, or support relationships.

Individuals in positions of trust must:

- Act in the best interests of children and adults at risk at all times
- Avoid any behaviour that could be misinterpreted, exploitative, or abusive
- Never misuse their position for personal, financial, emotional, or sexual gain
- Maintain appropriate boundaries in all interactions.

Professional Boundaries

Staff and volunteers must:

- Maintain clear professional boundaries at all times
- Avoid developing dependent or exclusive relationships with beneficiaries
- Not engage in personal relationships with children or adults at risk they support
- Use professional judgement when offering support, gifts, or assistance
- Not share personal contact details unless authorised and appropriate.

Any concerns about boundary blurring must be discussed with a manager or the Designated Safeguarding Lead (DSL)

Use of Power and Authority

We recognise that power imbalances may exist, particularly within domestic abuse contexts. Staff and volunteers must be mindful of this and ensure that their conduct promotes empowerment, choice, and dignity. Abuse of power, coercion, or manipulation by staff or volunteers will not be tolerated.

Allegations Against Staff, Volunteers, or People in Positions of Trust

Any concern or allegation that a member of staff, volunteer, trustee, or person in a position of trust has:

- Behaved in a way that has harmed, or may have harmed, a child or adult at risk
- Possibly committed a criminal offence against a child or adult at risk
- Behaved in a way that indicates they may pose a risk of harm.

This must be reported immediately to the Designated Safeguarding Lead or senior leadership.

Such concerns will be managed in line with statutory guidance, local authority procedures, and organisational disciplinary processes. Where required, referrals will be made to the Local Authority Designated Officer (LADO) or relevant safeguarding bodies.

Confidentiality and Professional Integrity

Staff and volunteers must handle information sensitively and in line with data protection requirements. Confidentiality must never be used as a reason to withhold safeguarding concerns. Please see S.13 of this policy for more information on Information Sharing.

Professional integrity, honesty, and accountability are essential to maintaining a safe and trusted service.

7. Fundraising

Safeguarding applies equally to all fundraising activities. Free to Fly is committed to ethical fundraising practices that protect children, adults at risk, donors, staff, and volunteers.

We ensure that fundraising activities are conducted with dignity, respect, and transparency. We do not exploit or place pressure on vulnerable individuals for the purposes of fundraising.

Any images, case studies, or personal stories used in fundraising materials are handled sensitively and only with informed and appropriate consent.

We are committed to protecting the privacy and wellbeing of beneficiaries and will never use fundraising approaches that compromise their safety, confidentiality, or dignity.

Staff and volunteers involved in fundraising must remain vigilant to the risk of financial exploitation and report any concerns in line with safeguarding procedures.

8. Online Safety

Free to Fly recognises that online and digital environments present specific safeguarding risks for children and adults at risk. We are committed to ensuring that all digital communication is safe, professional, transparent, and conducted within clear boundaries.

All staff and volunteers must:

- Use Free to Fly accounts and approved platforms for all communication with beneficiaries

- Avoid private messaging, personal social media contact, or informal online relationships with beneficiaries
- Maintain professional boundaries at all times when communicating online.

We take appropriate steps to:

- Protect personal data in line with data protection legislation
- Monitor and respond to online safeguarding risks, including grooming, coercive control, harassment, and exploitation
- Avoid private messaging, personal social media contact, or informal online relationships with beneficiaries
- Ensure that any online befriending or emotional support is delivered safely, appropriately, and in accordance with organisational guidance.

Any online safeguarding concerns must be reported promptly in line with safeguarding procedures.

9. Working with Other Organisations

We recognise that safeguarding is most effective when organisations work together. The organisation is committed to working collaboratively with statutory agencies and partner organisations to safeguard children and adults at risk.

Before entering into partnerships or joint working arrangements, we carry out appropriate due diligence to ensure that partner organisations have effective safeguarding policies, procedures, and safe working practices in place.

Where appropriate, written agreements are used to:

- Clarify roles and responsibilities
- Set out safeguarding expectations
- Support safe information sharing.

Information is shared lawfully, proportionately, and in line with statutory guidance to promote the safety and wellbeing of individuals.

Free to Fly will follow local safeguarding procedures and work in partnership with children's social care, adult social care, the police, health services, and other relevant agencies as required.

10. Safer Recruitment

We are committed to safer recruitment practices to ensure that staff and volunteers are suitable to work with children, care leavers, and adults at risk.

Our safer recruitment process includes:

- DBS checks, where required by role
- Identity verification
- Reference checks
- Employment history checks
- Support safe information sharing
- Safeguarding-focused interview questions

All new staff and volunteers undergo a probationary period and receive appropriate supervision to ensure they are safe, competent, and supported in their roles.

11. Training Requirements

All staff and volunteers receive safeguarding training appropriate to their role and level of responsibility.

This may include:

- Induction training on our policy and procedures
- Training on safeguarding children and vulnerable adults
- Regular safeguarding updates and refresher training
- Training on domestic abuse and coercive control
- Training on the Prevent Duty, where applicable
- Training on the Mental Capacity Act 2005

Ongoing supervision and support is available to all staff and volunteers from their manager, whilst training is regularly reviewed to ensure it reflects current legislation, guidance, and best practice. It is the responsibility of managers to ensure that their team members are appropriately trained and that training records are kept up to date.

12. Safer Working Practice

Safer working practice protects both beneficiaries and staff. All staff and volunteers must adhere to professional standards and safe working practices at all times.

This includes:

- Working transparently and avoiding secrecy
- Using organisational devices, systems, and accounts
- Keeping doors open during meetings where possible
- Avoiding lone working unless authorised and risk-assessed
- Maintaining professional language, behaviour, and boundaries
- Avoiding inappropriate personal disclosure
- Being mindful of power imbalances and never exploiting a position of trust.

All safeguarding concerns and boundary breaches must be recorded and reported immediately in line with safeguarding procedures.

13. Information Sharing

Information sharing is essential to effective safeguarding. Free to Fly shares information lawfully, proportionately, and in line with statutory guidance.

Information may be shared without consent where:

- A child or adult is at risk of harm
- A crime has been committed or may be committed
- Other individuals are at risk
- The individual lacks capacity to give consent.

Information sharing is carried out in accordance with the Data Protection Act 2018 and UK GDPR, ensuring that only relevant information is shared, and only with appropriate agencies.

Tipping Off

When a safeguarding concern is raised, staff and volunteers must not inform the person suspected of causing harm that a report or concern has been made. Doing so could place the child or vulnerable adult at further risk, influence their behaviour, or compromise an investigation.

Safeguarding concerns should only be shared with those who need to know in order to protect the individual or carry out an investigation.

Information about a safeguarding concern must be handled sensitively and confidentially.

Staff, volunteers, and anyone involved in handling safeguarding concerns on behalf of Free to Fly, should not discuss concerns with others, including colleagues, friends, family members, or the person involved, unless authorised to do so by the Designated Safeguarding Lead (DSL) or relevant safeguarding authority.

If there is any uncertainty about what information can be shared, staff should seek guidance from our DSL.

14. Record Keeping

Accurate, timely, and secure record keeping is essential to safeguarding practice.

All safeguarding concerns must be:

- Recorded on the same day
- Written using clear, factual language and the individual's own words where possible.

Records must include:

- Date and time of the concern
- Details of what was observed or disclosed

- Actions taken
- Decisions made and rationale
- Referrals completed and outcomes.

Safeguarding records are stored securely and are only accessible to authorised staff.

As a charity, we utilise a safeguarding record-keeping and management system, through which all referrals are submitted and managed. Team will be trained on this where required.

15. Policy Review

This policy will be reviewed annually, or sooner if there are changes to legislation, statutory guidance, local safeguarding arrangements, or organisational practice. Free to Fly is committed to continuous learning and improvement in safeguarding to ensure the highest standards of protection for children, and adults at risk.

Appendix A- Categories of abuse and safeguarding issues

Please note that the lists of signs and symptoms described below are not an exhaustive list.

Category of Abuse	Signs and Symptoms
<p>Physical Abuse is harm by causing physical injury to another person and this could include punching, kicking, scratching, suffocating, pulling hair, spitting, biting, slapping, pushing, rough handling, or scalding.</p>	<p>Bruising, scratches, marks on the body or broken bones. Anxiety, fear, self-harm, unexplained injuries, fractures, sprains, unexplained burn marks, flinching or cowering.</p>
<p>Sexual Abuse is the unwanted and/or forced sexual behaviour towards another person. This would include inappropriate comments, inappropriate touching, inuendo, sexual harassment, or rape.</p>	<p>Bruising and injury to genital areas, distress, STI's, unexpected pregnancy, stained or torn underwear. Severe distress, changes in behaviour, lack of trust, over sexualised behaviours, substance abuse.</p>
<p>Psychological and Emotional is the belittling of a person whether intended or unintended. Making a person feel uncomfortable, hurt, distressed by the actions/words of another person.</p>	<p>Shouting, swearing, harassing, belittling, threatening, and insulting behaviours, humiliating a person, talking in a different language on purpose, or devaluing a person. Aggression or passivity, disturbed sleep patterns, talking a lot about a particular person, depression, acting withdrawn, unusual weight loss/ gain, fear, confusion, running away, or low self-esteem.</p>
<p>Neglect or act of omission is the act of not completing whether intentionally or unintentionally care for a person that needs support or relies on you to care for them.</p>	<p>Failing to provide food, drink, shelter, privacy and dignity, access to health services, medication, and healthcare needs. Weight loss, dirty clothes, unwashed, regular infections, poor hygiene, or untreated illness.</p>
<p>Financial or Material Abuse is the abusive use of money that does not belong to you. This could include pressuring a person to provide money, stealing money or misusing money. It can include fraud, rogue trading, and scamming.</p>	<p>Not having money, they thought they had, a person handing money to other people, a person struggling to buy food and other necessities. Feeling worried or anxious, signatures that do not match the person's own financial records.</p>
<p>Discriminatory Abuse is to single out a person or a group for special favour or disfavour. Discrimination can be shown on the 9 Protected Characteristics of the Equality Act 2010.</p>	<p>Showing lack of respect to an individual, not allowed to access services, education, healthcare. Being withdrawn, fearful, isolated, exhibiting fear, anxiety, or anger.</p>

<p>Organisational or Institutional Abuse is when a person is subjected to routines and rules and strict boundaries over a prolonged period that have a significant effect on their day-to-day life. This would include people who have been in prison for a long time and people who have been in the armed forces for a sustained period and can occur in care type settings.</p>	<p>Doing whatever a person says, not being able to make their own decisions. Low confidence, fearing what may happen, reassurance often, discouraging visits or the involvement of relatives or friends, authoritarian management, or rigid regimes, not taking account of individuals' cultural, religious, or ethnic needs, or failure to respond to or report abuse.</p>
<p>Self-Neglect is an extreme lack of self-care; it is sometimes associated with hoarding and may be a result of other issues such as addictions.</p>	<p>Lack of self-care to an extent that it threatens personal health and safety, neglecting to care for one's personal hygiene, health or surroundings, inability to avoid self-harm, failure to seek help or access services to meet health and social care needs, inability, or unwillingness to manage one's personal affairs.</p>
<p>Modern Slavery is a crime which results in an abuse of a person's human rights. It can include slavery, exercising powers of ownership over a person.</p>	<p>Human trafficking, forced labour, domestic servitude, sexual exploitation, such as escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that realistically they never will be able to. Fear, depression, suicidal ideation, poor accommodation, physical injury.</p>
<p>Domestic Violence or Abuse is any type of controlling, coercive, threatening behaviour, violence, economic abuse, or abuse between people who are, or who have been in a relationship, regardless of gender or sexuality and can also be carried out by a family member or carer. Witnessing domestic abuse as a child or young person or adult at risk can have a detrimental impact upon wellbeing and development. The Company Domestic Abuse Policy can be accessed for additional support and information.</p>	<p>Physical injury, sexual injuries, answering a high volume of phone calls at work. Depression, suicidal ideation, fear, low self-esteem, confusion.</p>

Key risks include maternal substance use (alcohol, drugs, or medication misuse), domestic abuse, mental health difficulties, poor engagement with antenatal care, homelessness or unstable living conditions, poverty, and previous involvement with children's social care or history of child removal. Additional concerns may arise from young or vulnerable parents, learning disabilities, lack of support networks, or lifestyles that increase the risk of neglect or harm after birth. Early identification and multi-agency working between health professionals, midwives, social care, and other services are essential to assess risk, support parents, promote a safe environment, and ensure the baby's health, development, and wellbeing are protected from the earliest stage.

Online Abuse

Online Abuse is when a person uses digital technology, such as the internet, social media or mobile devices to harm, harass, exploit or expose them to harmful content or contact.

Sexual Exploitation

Sexual Exploitation is a type of sexual abuse whereby a person is exploited and given things such as gifts, drugs or alcohol, food, money, status, and affection, in exchange for performing sexual activities or acts. People at risk can be 'groomed' into believing that they are in a relationship and may not understand that the abuse/ exploitation is taking place.

Sexual Harassment

Sexual harassment occurs when a person engages in unwanted conduct of a sexual nature that has the purpose of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. It can happen to anyone at any time, in any place. Some examples of sexual harassment are unwelcome behaviour of a sexual nature, this may be either physical or verbal, inappropriate or suggestive remarks or verbal sexual advances, indecent comments, jokes or innuendos relating to a person's looks or private life, unwanted physical contact such as hugging, kissing or inappropriate touching, requests for sexual favours, and the display or circulation of pornography or indecent images.

Sexual Harm

Sexual Harm is a form of abuse that involves enticing or forcing a child or adult to take part in sexual activities or acts, and they may not be aware of what is happening. Acts of harm may include physical contact, penetration, or non-penetrative acts such as rubbing, touching outside of clothing, kissing and masturbation. Non-contact activities such as being made to look at or the production of sexual images, watching sexual activities, or grooming (including online), and encouraging the person to behave and participate in sexually inappropriate ways and behaviours.

Female Genital Mutilation (FGM)

FGM is known as female circumcision or genital cutting. It is important to note that there are no medical reasons for FGM. FGM is usually performed by someone with no medical training using instruments such as knives, scissors, razor blades or glass and victims are rarely administered with anaesthetic or antiseptic treatment and are often restrained by force. This type of abuse is used to control female sexuality and can cause severe long-lasting damage to a person's physical and emotional health and wellbeing throughout adult life.

Radicalisation and extremist views

Radicalisation is the process whereby a person or a group adopts radical views that are opposed to their current social, political and/or religious situations. The person or group goes on to support terrorism and extremist ideologies that are associated with terrorist group. Indicators of radicalisation or extremism may include showing sympathy for extremist causes, glorifying violence, especially to other faiths or cultures, making remarks or comments about being at extremist events or rallies outside of work, evidence of possessing illegal or extremist literature.

County Lines Criminal Exploitation

Criminal exploitation is where adults and children are manipulated and coerced into committing crimes. County Lines is the police term for “urban gangs” that exploit adults at risk and children into moving drugs, normally a large city, into other suburban areas.

Fabricated or induced illness

Fabricated or induced illness is an exceedingly rare form of abuse where a parent or carer can exaggerate or cause symptoms of illness within a child or adult at risk.

So-called ‘honour-based’ violence (HBV)

HBV is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community. HBV can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their perceived honour code.

Forced marriage

Forced marriage is a criminal offence and is when a person has a pressure to marry, and this relationship may have been chosen by the family. Behaviours may include threats, physical violence or sexual violence, or emotional and psychological pressure. The person may be made to feel they have brought shame on their family which can cause severe emotional harm, or they may lack the mental capacity to be aware of what is happening. This can also include being taken to another country to marry.

Gender-based violence (GBV)

GBV is directed at a person based on their biological sex or gender identity. It can include physical, sexual, verbal, emotional, and psychological abuse, threats, coercion, and economic or educational deprivation.

Bullying including Cyber-bullying

Bullying is a behaviour that hurts another person and can include physical and emotionally abusive acts such as name calling, spreading rumours, threatening, hitting, or undermining someone. It can cause significant harm both physically and emotionally if repeated over time. Cyberbullying occurs online and can follow a person wherever they may be, it can be done via mobile phone, texting, social media networks or gaming platforms.

Self-Harm

Self-harm is when a person intentionally causes damage or injury to their body, usually to cope with or express overwhelming emotional distress. Self-harm can be linked to thoughts of suicide or an intention to end their life, to punish themselves or release unbearable tension or to express extreme distress and could also be a cry for help.

Modern Slavery and Human Trafficking

Modern slavery is a crime which results in an abuse of a person's human rights. It can include slavery, exercising powers of ownership over a person, servitude- the obligation to provide services is imposed using coercion, forced or compulsory labour- work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily, and human trafficking- arranging or facilitating the travel of another person with a view to their exploitation. Employees are required to communicate the Company's zero-tolerance approach to modern slavery to all suppliers, subcontractors, and business partners at the outset of any business relationship and reinforce this approach as appropriate thereafter. The Company's Anti-Slavery, Exploitation and Human Trafficking policy should be read in accordance with this Policy.

Homelessness

Homelessness can have a significant impact upon a person's wellbeing and welfare. A person may be living on the streets, moving between temporary accommodation or shelters, including houses of friends, family, and emergency accommodation.

Peer-on-peer Abuse/ Child-on-child Abuse

People can be vulnerable to abuse from their peers. It can include physical, sexual harassment and violence, 'sexting,' emotional, via on and offline bullying, via relationship abuse and can even include grooming for sexual and criminal exploitation. Abusive behaviour should not be tolerated and passed off as "work banter" and should be dealt with appropriately using the Company's Code of Conduct and Anti- Bullying and Anti-Harassment policies.

Gangs and Serious Violence

There are many types of gangs and not all are illegal however some gang membership can be linked to illegal activity such as drugs, violent crime, or trafficking. It is important to be alert to your local area and information about local gangs and any serious violence incidents.

The Voyeurism Act

Upskirting is when a picture is taken under a person's clothing without their knowledge to view their genitals or buttocks to obtain sexual gratification. Upskirting can also be carried out to cause humiliation or distress.

Cuckooing

Professional criminals can target the homes of young people with care and support needs so that the property can be used for drug dealing. This process is known as cuckooing. It allows criminals to operate from a discreet property, out of sight and an appealing option to stay off

radar. The inhabitant of the property may be extremely fearful of speaking up for fear of being suspected to be involved, identified as a member of the group and at risk of eviction.

Missing Persons

If you have concerns regarding a 'missing' child or young person you must speak with the Line Manager.

Medical conditions

Medical conditions can present as a wellbeing and welfare issue if the child or young person does not have access to the appropriate medication if they are in a high-risk situation or role.

Substance Use

The use of substances such as drugs and/or alcohol. If this abuse leads to dependency, it can lead to cognitive, physical, and behavioural issues. The Company's Alcohol and Substance Dependency policy should be read in accordance with this policy.

Faith abuse

Abuse can also be linked to faith or belief. It can include belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray.

Private Fostering

Many private fostering arrangements can be 'hidden' and are not brought to the attention of local authorities, even though it is an offence not to inform them. This may be a significant cause for concern when not declared and leaves children and young people vulnerable to abuse or ill-treatment.

Mate Crime

A mate crime is when some people pretend to be friends with someone who has learning disabilities but then go on to exploit and/or abuse them. This has led to people losing their independence, financial, physical, and sexual abuse, exploitation and even murder. The way they are exploited may not be illegal, but it still has a negative impact on the individual. Mate crime is carried out by someone the person knows and often happens in private. In recent years there have been several serious cases relating to people with a learning disability who were murdered or seriously harmed by people who claimed to be their friend.

Appendix B- Relevant Legislation and Guidance

- [The Care Act 2014](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Mental Capacity Act 2005](#)
- [The Children Act 2004](#)
- [Children Act 1989](#)
- [The Equality Act 2010](#)
- [The Worker Protection Act 2024](#)
- [Mental Health Act 2007](#)
- [Children and Families Act 2014](#)
- [Modern Slavery Act 2015](#)
- [Serious Crime Act 2015](#)
- [Domestic Abuse Act 2021](#)
- [Crime and Disorder Act 1998](#)
- [Female Genital Mutilation Act 2003](#)
- [Children and Social Work Act 2017](#)
- [Sexual Offences Act 2003](#)
- [Prevent duty guidance: England and Wales 2023](#)
- [Working Together to Safeguard Children 2023](#)

[GOV.uk \(DOE\): Information sharing advice for safeguarding practitioners](#)

[GOV.UK Guidance: How to report a serious incident in your charity](#)

[Hampshire, Isle of Wight, Portsmouth and Southampton \(HIPS\) Safeguarding Children Procedures Manual](#)

[HIPS Unborn Baby Safety Protocol](#)

[Information Commissioner's Office: 10 Step Guide to Sharing Information to Safeguard Children](#)

[GOV.uk Report serious wrongdoing at a charity as a worker or volunteer](#)