Child Safeguarding Policy

Owner: Designated Safeguarding Lead
Relevant to: Staff, Volunteers and Trustees

Office Use only:

DEPARTMENT FAMILY:	SLT OWNER:	APPROVAL/RE-APPROVAL DATE:	IMPLEMENTATION DATE:	NEXT REVIEW DATE:
Goverance	Director of Services	09 July 2026	01 February 025	July 2027

NEW POLICY OR SUBSTANTIVE POLICY REVIEW

Version	Date	Policy development agreed by *(SLT owner)*	Policy development author	Draft policy verified by	Policy approval	Impact assessment *(if applicable)*
V1	01 February 2025	Director of Services	Designated Safeguarding Lead and Head of Services	Head of HR	CEO	N/a

Rationale for new or substantive policy review	As part of Headway UK's review of policies it was determined that it was best practice to have a separate safeguarding policy for children.

Please make explicit if change/review relates to procedures, guidelines and associated documents only

PERIODIC POLICY REVIEW / CHANGE HISTORY

Version	Date of review / revision	Description of change	Reviewed by	Approved by *(SLT owner)*
V2	July 2026	Review of policy	AP	SLT

COMMUNICATION

To be agreed by SLT Team

All staff email	x	Team meetings	
Newsletter		External website	

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1. Policy statement

Headway – the brain injury association (Headway UK) recognises that while fulfilling their duties, members of staff and volunteers may come into contact with children and adults at risk of harm.

Headway UK is committed to ensuring that it can fulfil its safeguarding responsibilities both for adults at risk and children that may be at risk of harm or exploitation. Although Headway UK works with adults aged over 18, it recognises that staff and volunteers, during the course of their work, may become aware of children experiencing or at risk from abuse. Headway UK also recognises that it has a duty to report incidents or suspected safeguarding concerns to the appropriate authorities.

This document will focus on safeguarding children – please refer to the Headway UK's Safeguarding policy for issues relating to adults at risk.

2. Definitions

SERVICE USERS: Includes individuals that use Headway UK services, such as people directly impacted by brain injury, including survivors, their family members and carers, professionals accessing Headway UK support via the website, publications or helpline, or corporate and individual members of Headway UK.

STAKEHOLDER: Includes volunteers, fundraisers, professionals, contractors, corporate partners, and others that come into contact with Headway UK.

SAFEGUARDING: Means 'protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect'.

The term is used to refer to four main areas of abuse relating to children, including:

PHYSICAL ABUSE: Includes hitting, shaking, throwing, drowning, burning or scalding, poisoning, suffocating, or otherwise causing physical harm to a child or failing to protect a child from that harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

EMOTIONAL ABUSE: Includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or support networks.

SEXUAL ABUSE: Involves someone forcing or enticing a child to take part in sexual activities. It may involve physical contact including both penetrative and non-penetrative acts such as masturbation, kissing rubbing and touching the outside of clothing. It may also include non-contact activities such as watching sexual activities, encouraging children to behave in sexually inappropriate ways, involving children in

looking at, or in the production of, sexual images and grooming a child in preparation for abuse (including via the internet).

NEGLECT: This is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. The physical signs of neglect may include constant hunger, sometimes stealing food from other children constantly dirty, have poor hygiene, loss of weight, or being constantly underweight and inappropriate clothing for the conditions. The following changes in behaviour in a child or young person may indicate neglect and these include complaining of being tired all the time, not requesting medical assistance and/or failing to attend appointments, having few friends and mentioning being left alone or unsupervised.

Within these four categories, children may be vulnerable to the same types of abuse as adults at risk:

EXPLOITATION: (abuse including sexual, psychological or financial)

- Examples of sexual exploitation include rape, sexual assault, being tricked or manipulated into having sex or performing a sexual act, being trafficked into, out of, or around the UK for the purpose of sexual exploitation, and being forced to take part in or watch pornography.
- Financial includes theft, fraud, internet scamming, and coercion in relation to finances (this may include being coerced into accessing an adult's finances).
- Psychological abuse can be defined as behaviour used to control, isolate or frighten.

RADICALISATION: The aim of radicalisation is to inspire new recruits, embed extreme views and persuade children to the legitimacy of a cause. This may be through a relationship or through social media.

PHYSICAL ABUSE OR NEGLECT: Includes hitting, slapping, pushing, kicking, restraint, and misuse of medication. It can also include inappropriate sanctions and withdrawal of basic needs, such as food. **Female genital mutilation (FGM)** is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK.

EMOTIONAL ABUSE OR NEGLECT: Includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling behaviour, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or support networks (such as school).

DISCRIMINATORY ABUSE: Abuse that centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act.

ORGANISATIONAL ABUSE: Includes neglect and poor care practice within an institution or care setting, such as a hospital, school or care home, or in relation to care provided in one's own home.

DOMESTIC ABUSE: Includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person's family. It also includes so-called 'honour-based violence'. Even if a child is not directly involved, witnessing domestic abuse is also child abuse.

MODERN SLAVERY: Encompasses slavery, human trafficking, forced labour, and domestic servitude.

SELF-NEGLECT: Neglecting to care for one's own personal hygiene, health, or surroundings (may be more applicable to older children).

CHILD-ON-PARENT VIOLENCE (CPV) OR ADOLESCENT-TO-PARENT VIOLENCE AND ABUSE (APVA): Is any behaviour used by a young person to control, dominate or coerce parents. It is intended to threaten and intimidate and puts family safety at risk. Whilst it is normal for adolescents to demonstrate healthy anger, conflict and frustration during their transition from childhood to adulthood, anger should not be confused with violence. Violence is about a range of behaviours including non-physical acts aimed at achieving ongoing control over another person by instilling fear. A child who is inflicting violence or abuse on an adult is a safeguarding concern due to the need for them to receive support and maintain their own safety. If the violence is towards an adult at risk, such as a brain injury survivor, then both the child and adult should be identified as safeguarding concerns.

DEFINITION OF A CHILD IN ENGLAND: A child is defined as anyone who has not yet reached their 18th birthday. Child protection guidance points out that even if a child has reached 16 years of age and is:

- living independently
- in further education
- a member of the armed forces
- in hospital; or
- in custody in the secure estate

they are still legally children and should be given the same protection and entitlements as any other child (Department for Education, 2023).

DEFINITION OF A CHILD IN NORTHERN IRELAND: The Children (Northern Ireland) Order 1995 defines a 'child' as a person under the age of 18.

DEFINITION OF A CHILD IN SCOTLAND: The definition of a child varies in different legal contexts, but statutory guidance that supports the Children and Young People (Scotland) Act 2014 includes all young people up to the age of 18.

Where a young person between the age of 16 and 18 requires support and protection, services will need to consider which legal framework best fits each person's needs and circumstances. The *National guidance for child protection in Scotland* gives more detail about this and explains how professionals should act to protect young people from harm in different circumstances (Scottish Government, 2023a).

DEFINITION OF A CHILD IN WALES: Section 3 of the Social Services and Well-being (Wales) Act 2014 states that a child is a person who is aged under 18. The 'Duty to report' in Wales is explained HERE.

DEFINITION OF A CHILD FOR HEADWAY UK: For the purposes of this policy, a child/children will be used to define all individual/s under the age of 18, with reference to the above statutory definitions.

3. Principles

Headway UK will take all safeguarding concerns seriously and will fully consider and report any concerns in a timely manner to the relevant person or authority.

Headway UK will ensure it maintains confidential records of any safeguarding concerns and any referrals made as a consequence. Any records will be kept in accordance with the Data Protection Policy and current legislation.

The statutory guidance enshrines the six principles of safeguarding:

- **Empowerment:** Presumption of person-led decisions and informed consent
- **Prevention:** It is better to take action before harm occurs
- **Proportionality:** Proportionate and least intrusive response appropriate to the risk presented
- **Protection:** Support and representation for those in greatest need
- **Partnerships:** Local solutions through services working with their communities
- **Accountability:** Accountability and transparency in delivering safeguarding

At Headway UK, we recognise that:

- The welfare of children is paramount.

- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- Extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse.

4. Scope and limitations

This policy applies to safeguarding concerns regarding children that you may have contact with whilst carrying out your duties as an employee/volunteer or trustee of Headway UK.

5. Responsibilities

The Chief Executive and the board of trustees are ultimately responsible for the overall compliance of Headway UK in relation to safeguarding.

The Designated Safeguarding Lead (DSL) is responsible for supporting staff and volunteers in safeguarding matters and will receive information and, when necessary, support staff and volunteers to make referrals.

Role	Name	Email	Number
Designated Safeguarding Lead (DSL)	Alex Power	alex.power@headway.org.uk	07765 352042

At Headway UK we also have a Deputy Designated Safeguarding Lead (DDSL) who will is responsible for supporting staff and volunteers in safeguarding matters in the absence of the Designated Safeguarding Lead.

Role	Name	Email	Number
Deputy Designated Safeguarding Lead (DDSL)	Ffion Jones	Ffion.Jones@headway.org.uk	0115 6950389

The Departmental Safeguarding Leads are responsible for supporting staff and volunteers in safeguarding matters when required within their department/area of responsibility. They will also work closely with the Designated Safeguarding Lead to

address areas of concern and identify improvements that can be made to ensure effective compliance in relation to safeguarding.

Role	Name	Email	Number
Charities and branches across the Headway network	Ffion Jones	Ffion.Jones@headway.org.uk	0115 6950389
Retail	David Byrne	David.Byrne@headway.org.uk	07917 214956
Services	Ruth Owens	ruth.owens@headway.org.uk	07887454289
Network	Marie Peacock	marie.peacock@headway.org.uk	07920 528600

The Children's Society proposed the **RADAR code**, which may be particularly relevant if you are in direct contact with the child:

- **Respect:** Value all children – it may be extremely difficult for them to disclose abuse or exploitation.
- **Approach:** Show warmth from the start - give the child a chance to build a relationship with you.
- **Discover:** Be pro-active – stay alert and on the lookout for potential signs of abuse
- **Ask:** Be 'professionally curious' - ask questions and take the child's answers seriously.
- **Respond:** Follow safeguarding procedures - keep the child informed and supported.

All staff and volunteers within Headway UK have a responsibility to ensure that they act in line with this policy.

6. Examples of potential safeguarding concerns

Some examples of types of situations that may present a safeguarding concern and result in implementation of the procedure detailed are provided below. This list is not

exhaustive, and staff and volunteers will need to exercise professional judgement in determining whether there are safeguarding concerns that need to be considered.

- Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.
- Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.
- Abuse can take place online, or in person.
- Children may be abused by an adult or adults, or another child or children.
- Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships

The Designated Safeguarding Lead, or in their absence one of the Deputy Safeguarding Leads, should be informed of concerns as soon as possible, and where necessary, seek advice. Advice can also be sought from the contacts detailed above.

Headway UK staff or volunteers may become aware of a child experiencing, or at risk of experiencing, abuse in various ways, for example:

- A volunteer at a shop or branch undertaking work experience or Duke of Edinburgh award.
- A service user or colleague who has children at home.
- A service user or colleague who is in contact with children through their work or social activities.

7. Making a report

The duty to investigate suspected abuse or harm rests with statutory authorities: primarily adult social care, children services, safeguarding and the police. If staff or volunteers become aware of a safeguarding matter, whether from an alleged victim or a third party, the below guidance should be followed:

i. Don't ignore it.

ii. Identify any immediate health and safety concerns, **contact emergency services if required**.

iii. For accuracy and speed of response, it is essential that you provide records and information, as soon as possible, after you are first made aware.

iv. Listen carefully, stay calm and make notes of times and details – this may need to be done after the event, so times may be approximate. If times are approximate, please clarify this in your report.

v. Reassure the child making the disclosure that what they have reported will be handled appropriately and sensitively. However, this will involve sharing information, on a needs to know basis, with other agencies.

vi. Keep questions to the minimum required to understand what is being reported. Avoid the child making the disclosure feeling that they are the subject of an interrogation.

vii. Explain to the child that you will need to report the matter and explain the process. **Consent to report is not necessary when the matter concerns a child,** however where possible their understanding is useful.

viii. Make a detailed record of the incident immediately. Where no immediate and significant risk to safety has been identified the safeguarding concern should be reported to the Designated Safeguarding Lead using the internal safeguarding reporting form - https://www.tfaforms.com/5105500 In addition, you can report and or discuss the matter, by phone or email with the Designated Safeguarding Lead, the Deputy Designated Safeguarding Lead or a Departmental Safeguarding Lead.

ix. It is important that reports are raised with local Social Services safeguarding teams as soon as possible. This should be undertaken by a Headway UK safeguarding officer (i.e. the Designated Safeguarding Lead, the Deputy Designated Safeguarding Lead or a Departmental Safeguarding Lead).
Staff and volunteers therefore must report to the Designated Safeguarding Lead, the Deputy Designated Safeguarding Lead or a Departmental Safeguarding Lead as soon as possible after you are made aware of the concern, so they can support you and liaise with social services.

x. If a volunteer or staff member has an **immediate and significant** concern for a child's **immediate safety** and they cannot contact the Designated Safeguarding Lead / Deputy Designated Safeguarding Lead or a Departmental Safeguarding Lead, they should report the matter to their line manager (**after** any necessary emergency services and/or local safeguarding team have been

contacted). The matter should then be reported at the earliest opportunity, using the internal safeguarding reporting form - https://www.tfaforms.com/5105500

xi. If an allegation concerns the line manager of the person making the report, or the Designated Safeguarding Lead, the report should be made to the Director of Services or the Chief Executive. The Designated Safeguarding Lead, the Director of Services or the Chief Executive will refer the matter directly to children's social care, safeguarding, or the police where appropriate to do so. If you remain concerned that your allegation is not being acted upon appropriately, please refer to Headway UK's Whistleblowing Policy for clarification on next steps.

When a concern is reported, Headway UK will evaluate and assess the information received to determine any need for further action. This will be led by the Designated Safeguarding Lead.

On receipt of a referral, the Designated Safeguarding Lead, or Deputy Designated Safeguarding Lead, will limit their enquiries to those necessary to undertake a risk assessment and:

i. Address any serious and immediate risk to the child, adult at risk or any other party.

ii. Preserve any evidence likely to be lost before external agencies can respond.

iii. Determine the need for referral to children's social care, safeguarding or the police (if not already undertaken) and provide sufficient information to the relevant external agency to enable an effective response.

iv. Determine any further procedures that should be invoked.

v. Identify any internal support required

This risk assessment may be carried out in conjunction with appropriate colleagues. If a referral to children's social care, safeguarding or the police is deemed appropriate, the Designated Safeguarding Lead or their nominee will support you to make the referral (if not already undertaken).

Where the suspected abuse is alleged to have been carried out by a staff member, Headway UK will work alongside external agencies during any investigations. Where appropriate the discplinary process will also be instigated.

The Designated Safeguarding Lead will be responsible for ensuring that a full record is kept of the risk assessment process and of any subsequent action taken. This will be done in accordance with Headway UK's Data Protection Policy and current legislation.

8. Implementation arrangements

All new members of staff and volunteers are made aware of the policy and requirements during the staff/volunteer induction process. Updated and amended procedures are disseminated in accordance with the policy review dates. Regular, mandatory training and updating of information to be completed by relevant staff.

9. Monitoring and review

This policy will be reviewed annually or in line with any changes to legislation.

Supporting/related documents

Appendix one - Devolved Nations and legal guidance.
Appendix two - Sources of information and support

The Data Protection Policy provides guidance in relation to Headway UK's approach to the General Data Protection Regulation.
Headway Safeguarding policy and procedure
Headway's Safer Recruitment Policy

Appendix one - Devolved Nations and legal guidance.

England • The Department for Education (DfE) is responsible for child protection in England. It sets out policy, legislation and statutory guidance on how the child protection system should work. • The main legislation in England is the Children Act 1989, the Children Act 2004 and the Children and Social Work Act 2017. • Local safeguarding partners are responsible for child protection policy, procedure and guidance at a local level. • The local safeguarding arrangements are led by three statutory safeguarding partners: - the local authority - the integrated care board (ICB, previously clinical commissioning group or 'CCG' - the police.	**Northern Ireland** • The Northern Ireland Executive, through the Department of Health (DoH), is responsible for child protection in Northern Ireland. They set out policy, legislation and statutory guidance on how the child protection system should work • The Safeguarding Board for Northern Ireland (SBNI) co-ordinates and ensures the effectiveness of work to protect and promote the welfare of children. • The board includes representatives from health, social care, the police, the probation board, youth justice, education, district councils and the NSPCC.
Scotland • The Scottish Government is responsible for child protection in Scotland. It sets out policy, legislation and statutory guidance on how the child protection system should work. • The key guidance for anyone working with children in Scotland is the National guidance for child protection in Scotland (Scottish Government, 2023a). • Child Protection Committees (CPCs) are responsible for multi-agency child protection policy, procedure, guidance and practice. • Within each local authority, CPCs work with local agencies, such as children's social work, health services and the police, to protect children.	**Wales** • The Social Services and Well-being (Wales) Act 2014 came into force in April 2016. It provides the legal framework for social service provision in Wales. • At a local level regional safeguarding children boards co-ordinate and ensure the effectiveness of work to protect and promote the welfare of children. They are responsible for local child protection policy, procedure and guidance. • Each board includes any: - local authority - chief officer of police - local health board - NHS trust - provider of probation services that falls within the safeguarding board area.

Appendix two – Sources of information and support

Headway UK Helpline – 0808 800 2244 helpline@headway.org.uk

Find the contact details for your local authority - enter the postcode via the following links :

England - https://www.gov.uk/report-child-abuse-to-local-council

Wales - https://www.gov.wales/find-your-local-authority

Scotland - https://www.mygov.scot/report-child-protection-concern

N. Ireland - https://www.nidirect.gov.uk/articles/reporting-child-abuse-and-neglect

Child Exploitation and Online Protection (CEOP) Centre - the UK's national police agency set up to tackle child sexual abuse and exploitation. If you are worried about someone's behaviour towards a child, either online or offline, you can report this to them

www.ceop.police.uk/Safety-Centre/

Childline – a free 24/hr service for children and young people

0800 1111

www.childline.org.uk

Kidscape - Information and advice for parents, carers and young people with concerns about school bullying and abuse

0207 823 5430

www.kidscape.org.uk

Lucy Faithfull Foundation - for individuals and families looking for help, advice, support and intervention with issues relating to child sexual abuse

lucyfaithfull.org.uk

NSPCC – UK charity dedicated to stopping child abuse.

Helpline - 0808 800 5000

www.nspcc.org.uk/

Parents Against Child Sexual Exploitation (PACE) - works alongside parents and carers whose children are or are at risk of being sexually exploited by perpetrators external to the family. They also offer guidance and training to professionals on how child sexual exploitation affects the whole family

www.paceuk.info

PARENTLINE PLUS - a national charity that works for, and with, parents. It works to offer help and support through an innovative range of free, flexible, responsive services - shaped by parents for parents.

www.parentlineplus.org.uk

Helpline: 0808 800 2222

Police Disclosure Scheme (Sarah's Law)

If you are worried about someone in your child's life, you can get them checked by the police to see if they have a record of child sexual offences.

www.gov.uk/police-check-someone-involved-with-child

Shore – for teenagers worried about matters such as sexual behaviour, thoughts, and grooming

www.shorespace.org.uk

Stop It Now! UK and Ireland - The confidential helpline supports any adult with concerns including those worried about the sexual behaviour of another adult towards

children, those worried about their own thoughts or behaviour towards children and those concerned about the worrying sexual behaviour of a child or young person.

Helpline - 0808 1000 900

www.stopitnow.org.uk/

The Hide Out - Information to help young people understand domestic abuse, and what to do if it's happening to them. (Run by domestic abuse charity Women's Aid).

www.thehideout.org.uk

YoungMinds - Provides advice and support to young people for their mental health, as well as supporting parents and carers

0808 802 5544 (Parents Helpline)

85258 (text the word 'shout')

www.youngminds.org.uk