



## **Children, Young People, and Adults at Risk Safeguarding Policy**

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## 1. Policy Statement

The Soil Association is committed to safeguarding and promoting the welfare of children, young people and adults at risk. We want every individual that has contact with us to feel safe and protected from maltreatment. We work in line with our values of Grounded, Inclusive and Nourishing and expect our colleagues to treat all those they engage with in this way.

We are committed to:

- Valuing, listening to and respecting the views of children, young people and adults at risk.
- Implementing safeguarding best practice through our policies, procedures and our Safeguarding Behaviour Code.
- Recruiting employees and volunteers safely, ensuring that a robust recruitment process is followed that supports fair and responsible selection decisions and all necessary checks are made to the appropriate level.
- Ensuring all Soil Association colleagues (our employees, Trustees, volunteers, contractors and agency workers) are aware of their responsibility to be alert to the possibility of maltreatment and to know what to do if they suspect it.
- Considering all the different environments where we interact with children, young people and adults at risk, including online.
- Providing effective management for colleagues through supervision, support and training so that everyone in our organisation knows about and follows our policies, procedures and our Safeguarding Behaviour Code confidently and competently, and understands and accepts their responsibilities to safeguard and promote the welfare of children, young people and adults at risk in any context they may interact with these groups.
- Reporting any safeguarding concerns to relevant agencies and involving third parties appropriately.
- Demonstrating our commitment to safeguarding children, young people and adults at risk by reviewing good practice and our policies in this area regularly at a senior management level.
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure in place to help us deal effectively with any bullying that does arise.
- Promoting a culture of openness within the organisation and making efforts to ensure colleagues feel able to raise concerns.

## 2. Scope

This Policy applies to Soil Association the registered charity, Soil Association Certification, Soil Exchange and SA Sales and Services, together referred to here after as 'Soil Association'.

This Policy applies to all those that work for and on behalf of the Soil Association whether paid or unpaid. This includes all trustees, employees, casual workers, volunteers, as well as contractors including self-employed or limited companies, temporary workers, agency workers, non-executive directors, together referred to as 'colleagues' in this Policy).

All colleagues must conduct themselves in accordance with this Policy and the Safeguarding Code of Behaviour (Appendix 3) in all your work for Soil Association. Any breach of the Safeguarding Policy or Behaviour Code may result in disciplinary action including dismissal, or the termination of your working agreement or involvement as a volunteer with Soil Association, as appropriate. We may also report you to Regulatory bodies, relevant Local Authorities and/or the police, as appropriate.

### **3. Associated Soil Association Policies**

The following Soil Association policies will be relevant when considering some of the issues outlined in this Policy (available internally via PeopleHR):

- Disclosure and Barring Service (DBS) Policy
- Recruitment Policy
- Whistleblowing Policy
- Recruitment of Ex-Offenders Policy
- Bullying and Harassment Policy
- Social Media Policy

### **4. Responsibilities**

The safeguarding of children, young people and adults at risk is everyone's responsibility, regardless of their role within the organisation. Everyone should:

- Be alert to and recognise issues relating to the welfare of children, young people and adults at risk
- Raise concerns appropriately and to the appropriate people
- Share information with others where necessary
- Challenge poor practice and support a safeguarding culture

The Safeguarding Lead Trustee, the Chair of the Audit & Risk Committee, is responsible for overseeing this Policy.

The appointed Designated Safeguarding Lead (DSL) is responsible for implementing this Policy and ensuring any safeguarding concerns are dealt with appropriately.

**The Group's Designated Safeguarding Lead is:**

**Nicola Spencer** – Group Resources Director  
Email: [nspencer@soilassociation.org](mailto:nspencer@soilassociation.org) Tel: +441173145162

**If unavailable, the Group's Deputy Designated Safeguarding Lead is:**

**James Cashmore** – Charity Managing Director  
Email: [jcashmore@soilassociation.org](mailto:jcashmore@soilassociation.org) Tel: +441179142445

They are supported by a Deputy Designated Safeguarding Lead (DDSL) in each part of the business. Together with the Group Head of People and the Health, Safety and Environment Lead, they are the Safeguarding Team who meet no less than three times a year to monitor and support safeguarding across the business.

The role and responsibilities of the DSL, with support from the Safeguarding Team, is to:

- Advise and support the executive teams in developing and establishing the Group's approach to safeguarding.
- Play a lead role in maintaining and reviewing the organisation's plan for safeguarding.
- Coordinate the distribution of policies, procedures and safeguarding resources throughout the organisation.
- Advise on training needs and development, providing training where appropriate.
- Provide safeguarding advice and support to colleagues and volunteers.
- Ensure that all those working on behalf of or for the Soil Association who may come into contact with children, young people or adults at risk are aware of what they should do and who they should go to if they are concerned that an individual may be subject to abuse or neglect.
- Ensure that any concern about a child, young person, or adult at risk is acted upon, clearly recorded, referred on to the relevant bodies where necessary and followed up to ensure the issues are addressed.
- Record any reported incidents in relation to a child, young person or adult at risk or a breach of our Safeguarding policy and procedures. This will be kept in a secure place and its contents will be confidential in accordance with the Data Protection Act 2018.

## 5. Definitions

**Child or Children:** "Child" or "Children" means anyone up to the age of 18 years including an unborn child. The fact that a child has reached 16 years of age, and maybe living independently, does not change their entitlement or status to services or protection.

**Adult at Risk:** Under the Care Act 2014, safeguarding duties apply to any adult who:

- Has needs for care and support (whether or not the local authority is meeting any of these needs); and
- Is experiencing, or at risk of, abuse or neglect; and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

**Maltreatment:** Maltreatment is the abuse and neglect of children, young people or adults at risk. It includes all forms of ill-treatment, abuse, neglect and exploitation and it can seriously impair a person's health, dignity and development. A list of the different types of maltreatment is provided in Appendix 1.

## **6. Culture of Safeguarding**

Soil Association is committed to supporting an effective culture of safeguarding, to create an environment that keeps children, young people and adults at risk safe from all forms of harm and prevent maltreatment from happening. This means accepting that safeguarding issues can and may well occur in settings and other environments where we interact with children, young people and adults at risk. We should all be vigilant and not make assumptions or accept things at face value.

## **7. Working With Children, Young People and Adults at risk in settings**

When working in schools, early years, community, hospital, care or catering settings and any other setting with children or young people or adults at risk, Soil Association colleagues must ensure that they understand and always follow the setting's safeguarding policies and procedures alongside our own. We will only work with children, young people and adults at risk with the supervision of the setting's colleagues or responsible adult as recognised by the setting's policy.

Whilst it is always the primary responsibility of the setting to ensure the welfare of children, young people or adults at risk in their care, we will make sure that it operates its own risk assessments and measures to safeguard and promote the welfare of children and young people we may work with.

Soil Association colleagues must never and will never spend time with an individual child/young person alone or with groups of children/young people alone. When meetings with individual or groups of children/ young people may be required to seek their feedback, such meetings must and will take place as openly as possible with the supervision of the responsible adult in accordance with the setting's safeguarding policies.

When working with a setting, we may suggest the setting invite special guests, speakers, members of the community to take part in Soil Association activities or volunteer to support a programme. It is the setting's responsibility to make sure these individuals are always supervised, and children are not left alone with these guests.

At the commencement of activity in schools or any settings with children and young people, the Designated Safeguarding Lead for the setting will be made aware of and offered a copy of our Safeguarding Children, Young People and Adults at Risk Policy.

When working with children, young people or adults at risk, Soil Association colleagues should always act as a role model of good and appropriate behaviour by following the Safeguarding Behaviour Code in Appendix 3.

## **8. Use of social media, mobile phones and other digital technology**

Soil Association colleagues must never communicate directly with the children, young people or adults at risk that they have met during the course of their work by email, text messages or via social media. You should never share your phone number, address or contact details with children, young people and adults at risk. This includes friending or following on social media platforms, liking posts or messaging them. Clear boundaries should be set and communicated. All employees, trustees and volunteers and contractors should be aware of the Soil Association social media policy. This includes the use of mobile phones and any digital technology. Colleagues should be aware and understand that it is unlawful to photograph children and young people without the explicit consent of the person with parental responsibilities.

## **9. What to do if you suspect maltreatment**

If you are made aware of abuse or have any grounds for concern about the welfare of a child, young person or adult at risk your first act must be to minimise any further harm if possible / appropriate. This may include first aid or removal of personnel.

In an emergency situation, where you believe there may be immediate danger or risk of injury to a child, young person or adult at risk, you must always call 999 to contact the emergency services if in the UK, or appropriate emergency services number if overseas.

You must then report this suspected maltreatment immediately, following the procedures below.

Under no circumstances should a member of Soil Association personally investigate the child, young person or adult at risk's claim or their own concerns.

### **9.1. Procedure for reporting concerns in the UK**

If you have a concern regarding a child, young person or at risk adult, or they confide in you on a matter relating to abuse or other maltreatment, you must attempt to seek the consent of the individual (if consent was not obtained please record reasons why) and then the concerns must be immediately reported to:

- Safeguarding Lead for the setting or organisation (please check and follow the safeguarding policies for the setting), and
- the Soil Association DDSL (Deputy Designated Safeguarding Lead) for your department (see diagram in Appendix 2), and
- your Line Manager

within 24 hours of the concerns being raised, by completing the Safeguarding Concern Report Form (Appendix 4).

## **9.2. Inspectors, auditors and employees working internationally**

Soil Association colleagues including contractors undertake work at international locations. Safeguarding is, in a number of situations, included as part of the audit or inspection and will be raised as a non-conformance (breach in conforming), and in turn reported to the Safeguarding Team. In the event that there is a concern not reported through a non-conformance, the Safeguarding Concern form (Appendix 4) should be completed and immediately reported to the Soil Association DDSL (Deputy Designated Safeguarding Lead) for your department (see diagram in Appendix 2). The relevant DDSL will assess the situation and report appropriately based on site location.

## **9.3. Reporting concerns about Soil Association colleagues**

If any Soil Association colleague has or suspects concerns about the behaviour, conduct of Soil Association colleagues with children, young people, or adults at risk, this must be reported immediately to one of the Soil Association's Deputy Designated Safeguarding Leads (see Appendix 2 for organisational chart) within 24 hours by completing the form in Appendix 4. If the relevant DDSL is not available, please contact the DSL (Designated Safeguarding Lead) whose contact details are in section 4.

If a member of the public has or suspects concerns about the behaviour, conduct of Soil Association colleagues they should contact the Designated Safeguarding Lead (contact details in section 4) or they can follow our Whistleblowing Policy.

## **9.4. Whistleblowing**

If you feel unable to report concerns following the procedures above, you should follow the procedures outlined in the Whistleblowing Policy, available on our website. All concerns should be reported immediately.

## **9.5. Recording and record keeping**

A written record (form in Appendix 4 or non-conformance report as detailed in section 9.2) must be completed about any safeguarding concern regarding a child, young person or adult at risk.

The record must include details of the person involved, the nature of the concern and the actions taken, decision made and why they were made. All records must be signed and dated.

Once you have confirmed acknowledgement that your report has been received by the DSL / DDSL, do not retain a copy of it and ensure you securely and confidentially dispose of any emails, electronic or paper copies



of this form. All records must be securely and confidentially stored or disposed of in line with the Data Protection Act 2018.

## **9.6. Confidentiality and data protection**

All individuals that access our services or encounter us have the right to expect that all Soil Association colleagues will deal sensitively and sympathetically with their situation. Information will be treated as confidential and handled with sensitivity and, subject to the paragraph below, only shared with external agencies where consent has been requested or agreed. Any information and data connected to safeguarding will always be handled under the Data Protection Act 2018.

However, if a safeguarding concern is raised, the need to safeguard the child, young person or adult at risk overrules the right to confidentiality and information that has been given in confidence may in such instances be shared with the relevant authorities. The Data Protection Act 2018 does not prevent the appropriate disclosing of information in this instance; the welfare of children, young people and adults at risk must always take precedence.

## **9.7. Support**

Suspecting or witnessing abuse or other forms of maltreatment can be very upsetting and you are encouraged to seek the support of your line manager, and/or the relevant DDSL or DSL to assist you with managing the situation and reporting concerns. If you are an employee and you need further support, please contact the People Team or access our Employee Assistance Programme (login details are found in the Employee Handbook). Volunteers should contact their coordinator, Soil Association main contact or the People team.

## **9.8. In the event of a reported concern**

The DSL or DDSL receiving the report will review it, which may include asking for more information and discussing with other members of the Safeguarding Team. They will decide if the concern requires reporting externally to an appropriate body and, in the instance of a concern raised about a Soil Association employee, whether a disciplinary procedure is also required.

If you have raised the concern and you are not happy with the decision made by the Safeguarding Team and you believe more action needs to be taken, you should feel confident to raise your concerns. The welfare of the child, young person or adult at risk is paramount.

All safeguarding concerns and the actions taken will be reported to the Safeguarding Lead Trustee and, if necessary, the Board of Trustees or relevant Board of Directors (maintaining appropriate confidentiality regarding the details of the concern).

The Safeguarding Lead Trustee will determine whether a report to the Charity Commission is required.

## **10. Prevention**

### **10.1. Recruitment and selection procedures**

To help safeguard children, young people and adults at risk that access our services, we will ensure that robust and fair recruitment procedures are followed for the recruitment and selection of all Soil Association colleagues that come into contact with children, young people and adults at risk.

To ensure a robust process we will request a criminal record check processed through the Disclosure Barring Service (DBS) for all Soil Association colleagues working in the UK whose role is eligible for a check in accordance with the guidance on the UK Government website.

The People Team has a list of roles which require DBS checks and they ensure the checks are completed for the relevant employees.

For further information on these procedures, please refer to the above named related policies (available on PeopleHR or by request to the Soil Association People team).

### **10.2. Safeguarding training**

The Soil Association's DSL, DDSLs, Health, Safety & Environmental Lead and Group Head of People will complete level 3 safeguarding training and subsequent refresher training every two years.

All Soil Association colleagues working with children, young people or adults at risk, will be made aware of their responsibilities for safeguarding as part of their induction. They will be provided with a copy of this policy through PeopleHR and a copy of the guidelines on working with these groups will be provided.

All Soil Association colleagues who may encounter children, young people or adults at risk as part of their job are recommended to complete safeguarding level 1 training online. For Soil Association colleagues whose roles are subject to Enhanced DBS + Barred for Children checks, level 2 training is mandatory and to be completed within the probationary period. They will be required to maintain their CPD in relation to Safeguarding, with refresher training every 2 years, and attend any local safeguarding training available to them.

Any colleagues who require these checks and training for their role must keep them up to date. Any training or checks that expire must be refreshed

within 6 weeks of the expiry date. If this is not completed within 6 weeks then the disciplinary procedure may be initiated or a contractors services terminated.

### **10.3. Working with other organisations**

We will carry out proper due diligence when we work with, or make grants to, any other bodies (including delivery partners, trading subsidiaries of the charity, organisations we fund or connected charities), checking their suitability and that they have in place appropriate safeguarding policies and procedures. We will have processes to ensure there are documented clear lines of responsibility and reporting between all bodies involved.

#### **Document control:**

<b>Date of current issue</b>	<b>July 2024</b>
<b>Date of next review</b>	<b>July 2025</b>
<b>Owner</b>	<b>Designated Safeguarding Lead and Safeguarding Team</b>
<b>Reference number</b>	<b>HRP0017</b>
<b>Version</b>	<b>4</b>

## **Appendix 1**

Please be aware that these are not exhaustive lists.

### ***Types of Maltreatment of Children***

- **Child Sexual Exploitation (CSE):** CSE is when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity.
- **Child Criminal Exploitation (CCE):** CCE is where drug networks or gangs groom and exploit children to carry drugs, guns, money and other items that are used in criminal activity.
- **Grooming:** Grooming is when somebody builds an emotional connection with a child either online or face to face – gaining their trust for the purpose of sexual abuse, exploitation, radicalisation or trafficking.
- **Harmful Sexual Behaviour (HSB):** HSB is developmentally inappropriate sexual behaviour displayed by children. It is seen as a continuum, from behaviour which is deemed to be inappropriate to that which is abusive and violent. It can happen in person or online (or both).
- **Forced marriage:** In a forced marriage, one or both people do not or cannot consent to the marriage (due to age or disability), duress may have been used and actions may have been taken to coerce one or both of the people into the marriage.

**Online abuse:** Online abuse is any type of abuse that happens over the internet or a mobile network.

- **So-called 'honour-based' abuse:** Radicalisation is the process by which someone comes to believe or support extremist ideologies that are associated with terrorist groups. Extremist views can be political, religious or ideological.
- **Modern slavery:** Modern slavery is a type of abuse that is more likely to be associated with adults, but children can also be victims of modern slavery. It encompasses slavery, human trafficking, forced labour and domestic servitude. It can also be linked to exploitation, such as CSE and CCE.
- **Child trafficking:** Child trafficking is when children are recruited, moved or transported and then exploited, forced to work or sold. Children are trafficked for many reasons, including sexual abuse, benefit fraud, forced marriage, domestic servitude, forced labour in factories or agriculture, criminal activity and low-wage labour.

### ***Types of Maltreatment & Abuse of Adults at Risk***

- **Physical abuse:** usually the use of force to cause pain and injury and signs might include burns, bruising, scratches, or accidents that cannot be explained. Also included is misuse of medication or forcing someone, for example, to stay in a care home against their wishes.

- **Neglect and acts of omission:** where basic needs are not met, such as adequate food or warmth or help with personal hygiene. Signs might include deteriorating health, appearance or mood.
- **Financial or material abuse:** where an individual is exploited for financial or material gain. Often valuables will go missing or there may be a change in financial circumstances that cannot be explained.
- **Sexual abuse:** this includes rape and sexual assault or sexual acts which the adult at risk has not or could not consent to or was pressurised or manipulated into. Signs can include changes in behaviour or physical discomfort.
- **Psychological abuse:** this might be emotional abuse such as threats of harm or abandonment, enforced isolation, blaming or controlling behaviour, or verbal and racial insults. Signs may be fear, confusion or disturbed sleep.
- **Discriminatory abuse:** any sort of abuse based on their race, gender or impairment such as their mental or physical health.
- **Institutional abuse:** poor professional practice, including neglect, which can take the form of isolated incidents right through to ill treatment or gross misconduct.
- **Domestic Violence:** including psychological, physical, sexual, financial, emotional abuse.
- **Modern Slavery:** encompasses slavery, human trafficking, forced labour and domestic servitude.
- **Self-neglect:** this covers a wide range of behaviour including neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

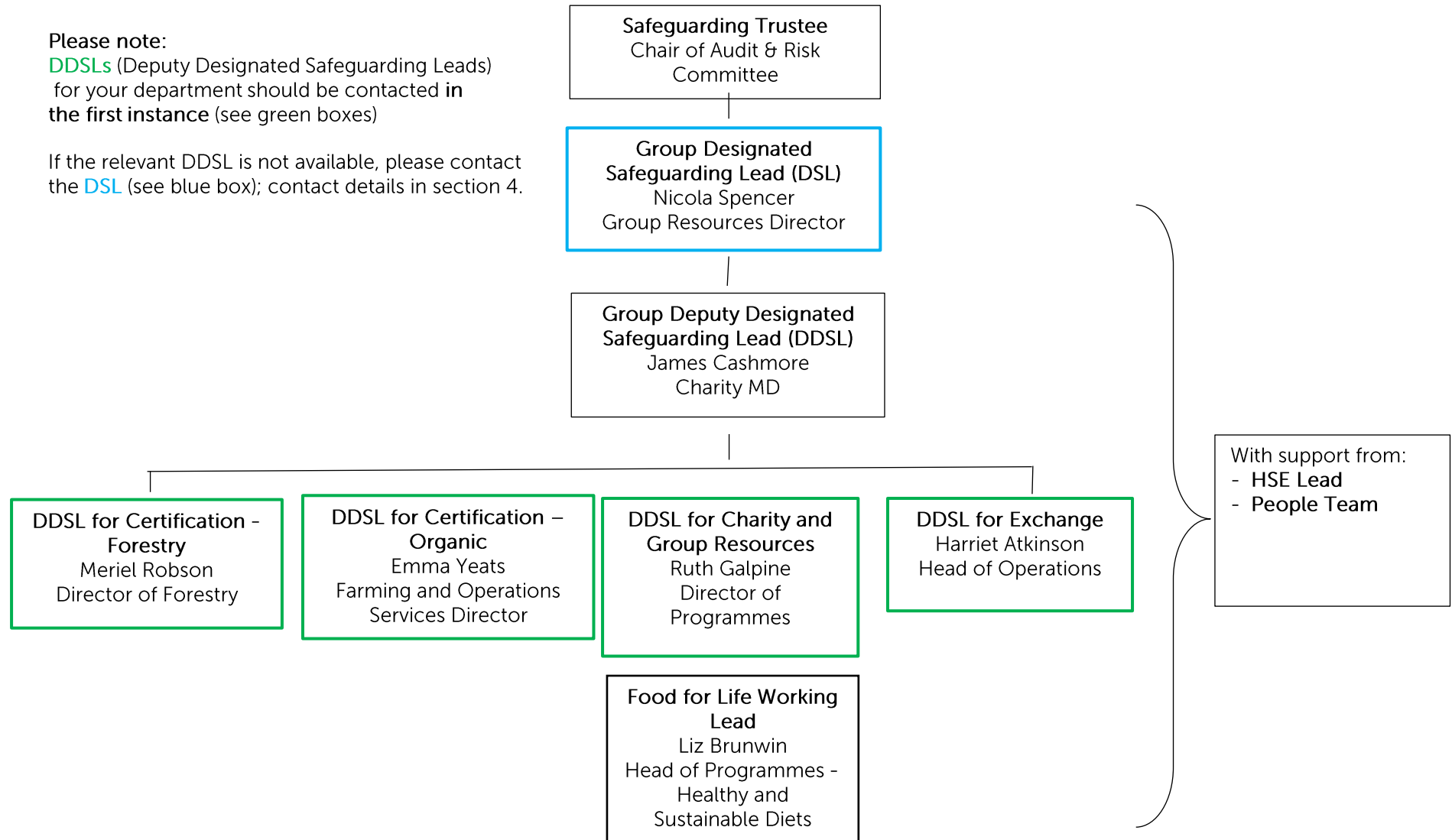
## Appendix 2

# Safeguarding Leads Chart

Please note:

**DDSLs** (Deputy Designated Safeguarding Leads) for your department should be contacted in the first instance (see green boxes)

If the relevant DDSL is not available, please contact the **DSL** (see blue box); contact details in section 4.



## Appendix 3

### **Soil Association Safeguarding Behaviour Code**

This Code of Behaviour sets out what is expected from everyone working for Soil Association – all trustees, employees, casual workers, volunteers, as well as contractors including self-employed or Ltd companies, temporary workers, agency workers, non-executive directors are required to adhere to this Code.

Please speak to your manager if you are unclear or require further clarification.

It is a requirement to promote the safety and welfare of Children and Adults at Risk at all times.

**It is not permissible (and in some instances may be unlawful) for you to:**

- use your position to intimidate, bully, threaten, discriminate against, coerce or undermine children and young people, adults at risk, volunteers or colleagues.
- behave or communicate with children, young people or adults at risk in ways which seek to build inappropriate relationships in order to abuse or put them at risk.
- take photos or video of a child or young person without written permission of the parent/ guardian of the child.
- take photos or video of a child or young person on your personal mobile phone. Any images taken on a colleague's work mobile must be submitted to the organisation and deleted from the colleague's work mobile. All photos or video of children and young people taken must be decent and respectful.
- give children and young people your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account.
- have contact with a child or young person using their personal contact details or hold these details. engage in, or attempt to engage in, sexual or inappropriate relationships with children, young people or adults at risk for whatever reason, including the use of suggestive conversations, comments, texting or emails.
- possess indecent images of children; this will always be reported to the police regardless of the explanation provided.
- use a relationship with a service user or their family for personal gain. Gift-giving and the acceptance of presents should only take place in agreement with your manager.
- give special rewards or privileges in an attempt to build inappropriate relationships with children and young people or adults at risk.
- encourage or assist others to break the law in any way.
- distribute or promote extremist material

This may not be a definitive list but demonstrates the core unacceptable behaviours or actions.

## Appendix 4

### Safeguarding Concern Report Form - private and confidential

To comply with the Soil Association's policy and procedure on Safeguarding and promoting the welfare of children, young people and adults at risk it is important that we record details of any suspicions or disclosures of maltreatment.

Information provided on this form will only be used for this purpose and will be stored confidentially in accordance with the Data Protection Act 2018.

Please send this form to the Deputy Designated Safeguarding Lead for the relevant area (see Appendix 2 for a diagram of the Safeguarding Leads) and for data protection purposes, once you have confirmed receipt of this form do not retain a copy of it - securely and confidentially dispose of any emails, electronic or paper copies of this form.

Your Name:

Your contact details:

Address:

Email:

Tel:

Date/Time and location of incident/conversation:

Name of individual(s) involved in incident/conversation:

Organisation where individual is registered / concern was raised or witnessed:

Brief description of incident/conversation/what you witnessed. Focus on facts and make a clear distinction between fact/opinion/hearsay. Please try to record exact quotes where possible, even if the language is unpleasant/unprofessional. If relevant, draw a diagram to show any marks or injuries you saw and where they were on the person's body. Be as specific as you can and use an extra sheet if necessary:



Please detail if you obtained consent or record reasons why consent was not obtained from the individual:

Details of any witnesses to incident/conversation including names:

Brief outline of actions/advice taken, including any other services/people contacted at this point:

Date form was completed:

Any further actions needing to be taken by the Soil Association or Designated Safeguarding Lead? If yes, please give details below of action taken:

Signed by:

..... Date ..... (Soil Association representative)

..... (Name)

..... Date ..... (Organisation)

..... (Name)