SAFEGUARDING POLICY AND PROCEDURES

Thrive Youth Ministries
Thrive Youth Ministries Office
Rear of Whitnash Methodist Church
Murcott Road East
Whitnash
Leamington Spa
CV31 2JJ
Other contact details for Thrive in connection with safeguarding are included in Section 14. Contact details for external agencies are included in Section 16.

This document was developed with reference to policies published by Thirtyone:eight.

Thrive's Trustees are responsible for the approval of this Safeguarding Policy. Thrive's Trustees approved this document on 17 July 2025.

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Introduction, definitions and when this Safeguarding Policy applies

1 Introduction

1.1 Thrive supports churches and other groups to promote its main objects of inspiring and equipping youth and children's ministry across Warwickshire and Coventry. Its objectives are to build on existing, good youth work; to help churches reach more young people; to train and equip leaders to be effective; to mentor youth ministers and leaders; to run a website for all youth ministry needs and to see more young people come to faith in Jesus. Thrive is a charitable organisation operated by Thrive Workers (who are paid staff and unpaid volunteers).

1.2 This Safeguarding Policy describes Thrive's requirements in relation to the safeguarding of children and young people and other vulnerable people, such as adults at risk. The policy is designed to protect everybody involved with Thrive. Thrive believes that all people are of equal

worth in the sight of God and aims to follow biblical principles in all that we do. Thrive is committed to nurturing and protecting the general welfare of children and young people and to treating them with respect and dignity. These principles should be reflected in the approach taken by Thrive Workers and in their attitude, behaviour and communications.

1.3 If any Thrive Worker has *any* suspicions or concerns that a person may be being abused (or knowledge of actual abuse) or is otherwise at risk of harm, an appropriate report should be made. More details are included in Sections 10 to 12. The first point of contact for such a report should be the relevant Event Safeguarding Lead. If the Event Safeguarding Lead is not available, or discussion with the Event Safeguarding Lead may compromise any part of this Safeguarding Policy, please contact Thrive's Safeguarding Lead, Thrive's CEO or Thrives' Trustee With Responsibility For Safeguarding (see Section 14 for contact details). Reports should be written but in exceptional cases may be made orally. Whenever a report is made it is important to ensure that the person to whom the report is made understands that a safeguarding notification is being made.

1.4 Thrive's Safeguarding Lead is nominated by Thrive's CEO to deal with any allegation or suspicion of harm, including referring the matter on to the statutory authorities. If there is any doubt as to what to do in connection with any safeguarding concern contact Thrive's Safeguarding Lead (or Thrive's CEO or Thrive's Trustee With Responsibility For Safeguarding). Thrive will never be critical of a person for asking for guidance.

1.5 This Safeguarding Policy may be reviewed at any time, and should formally be reviewed by Thrive's Safeguarding Lead and Thrive's Trustee With Responsibility For Safeguarding at least annually.

1.6 Thrive is currently a member of thirtyone:eight (https://thirtyoneeight.org/), an independent Christian charity, which advises Thrive in relation to safeguarding issues and concerns.

1.7 This Safeguarding Policy is implemented in line with the Charity Commission's encouragement to demonstrate awareness of governance responsibilities and Thrive's commitment to fostering healthy culture. In particular, Thrive recognises that people with whom it works (whether as a Thrive Worker or as children or young people) may themselves have been subjected to abuse and aims to support them directly or through signposting them to services that may assist them.

1.1 This Safeguarding Policy is designed to reflect what Thrive considers to be best practice, but it is recognised that in particular circumstances it may not be practicable or desirable to implement all aspects fully, and the policy may (at the discretion of Thrive's CEO, Thrive's Safeguarding Lead, Thrive's Trustee With Responsibility For Safeguarding and/or the relevant Event Safeguarding Lead, as in each case appropriate given the circumstances) be amended or deviated from to take account of specific circumstances. In cases of such amendment or deviation it is best practice for a note of the circumstances and reasons for amendment or deviation to be made and shared with Thrive's Safeguarding Lead and Thrive's Trustee With Responsibility For Safeguarding.

2 Definitions

2.1 In this Safeguarding Policy the following definitions apply:

"**Candidate**"	a person applying to be a Thrive Worker (that is to be employed by or to volunteer to represent Thrive in any capacity dealing with children or young people);
"**child**" and "**children**"	a person who appears to the Event Safeguarding Lead to be under the age of 11 or not yet at secondary school;
"**children and young people**"	persons who are under the age of 18 and others who are vulnerable (which may include adults at risk);
"**DBS**"	HM Government's Disclosure & Barring Service and in assessing whether a "DBS check" is appropriate reference should be made to the guidance issued by the Government in relation to level of check (Basic, Standard, Enhanced or Enhanced with Barred Lists) applicable to the function to be fulfilled;

"**Event Log**"	the log of information held by Thrive relating to Thrive Events maintained in accordance with this Safeguarding Policy;
"**Event Safeguarding Lead**"	the Thrive Worker(s) nominated by Thrive's Safeguarding Lead or Thrive's Executive to act as an Event Safeguarding Lead of a Thrive Event or for another specific purpose (and who is responsible for ensuring compliance with this Safeguarding Policy at any Thrive Event). If there is only one Thrive Worker present at a Thrive Event, that person shall be the Event Safeguarding Lead (if more than one Thrive Worker is present and none has been appointed as Event Safeguarding Lead, any Thrive employees will be deemed to be the Event Safeguarding Leads, and if there are no Thrive employees present all Thrive Worker shall be Event Safeguarding Leads unless they agree otherwise amongst themselves);
"**Partner Leader**"	the leader who represents a Partner at a Thrive Event who (subject as stated in Section 3.3) the Partner has confirmed has a current appropriate DBS check and has satisfied the Partner's own Safeguarding Policy;
"**Partners**"	churches and other groups which Thrive works with or supports;
"**Responsible Person**"	in relation to children and young people, a person who has a legal responsibility for the welfare of children and young people (such as parents, grandparents, adult siblings, social services, a guardian, carer or representative of an appropriate governmental, medical or police authority);
"**Safeguarding Policy**"	the policies set out in this document or incorporated into it by reference as (in each case) amended and supplemented from time to time;
"**Safeguarding Register**"	the log of information maintained by Thrive's Safeguarding Lead relating recording safeguarding concerns maintained in accordance with this Safeguarding Policy;
"**Thrive**"	Thrive Youth Ministries, a charity constituted by a trust deed dated 14 November 2011 to advance the Christian faith among young people in England and registered with the charity commission with number 1145794.
"**Thrive's CEO**"	the person employed by Thrive (acting through Thrives Trustees) appointed to act as Chief Executive Officer of Thrive from time to time (who at the date of adoption of this Safeguarding Policy is Andy Castle);
"**Thrive Event**"	a meeting or communication (whether physical or virtual) between any Thrive Workers and children and/or young people;
"**Thrive's Executive**"	the Thrive management team led by Thrive's CEO (at the date of adoption of this Safeguarding Policy this comprises the CEO alone);
"**Thrive's Safeguarding Lead**"	Thrive Worker nominated by Thrive's CEO to assume responsibility for addressing safeguarding issues and when appropriate liaising with Thrive's contracted safeguarding advisors (if that person is not available his or her function shall be assumed by Thrive's CEO);
"**Thrive's Trustee With Responsibility For Safeguarding**"	the member of Thrive's Trustees who has specific responsibility for this policy and safeguarding (at the date of adoption of this Safeguarding Policy the relevant Thrive's Trustee is Sam Davis);
"**Thrive's Trustees"**	the trustees of Thrive at the relevant time and the "*Chair of Thrive's Trustees*" is the person who is nominated as such by the trustees from time to time; and
"**Thrive Workers**"	each person who is employed by Thrive or who has been approved by Thrive to work with children or young people in (in each case) their capacities as such (as distinct from being involved as a result of

employment by, or volunteering with, a Partner) see Section 3.4 for further clarification.

2.2 In this Safeguarding Policy:

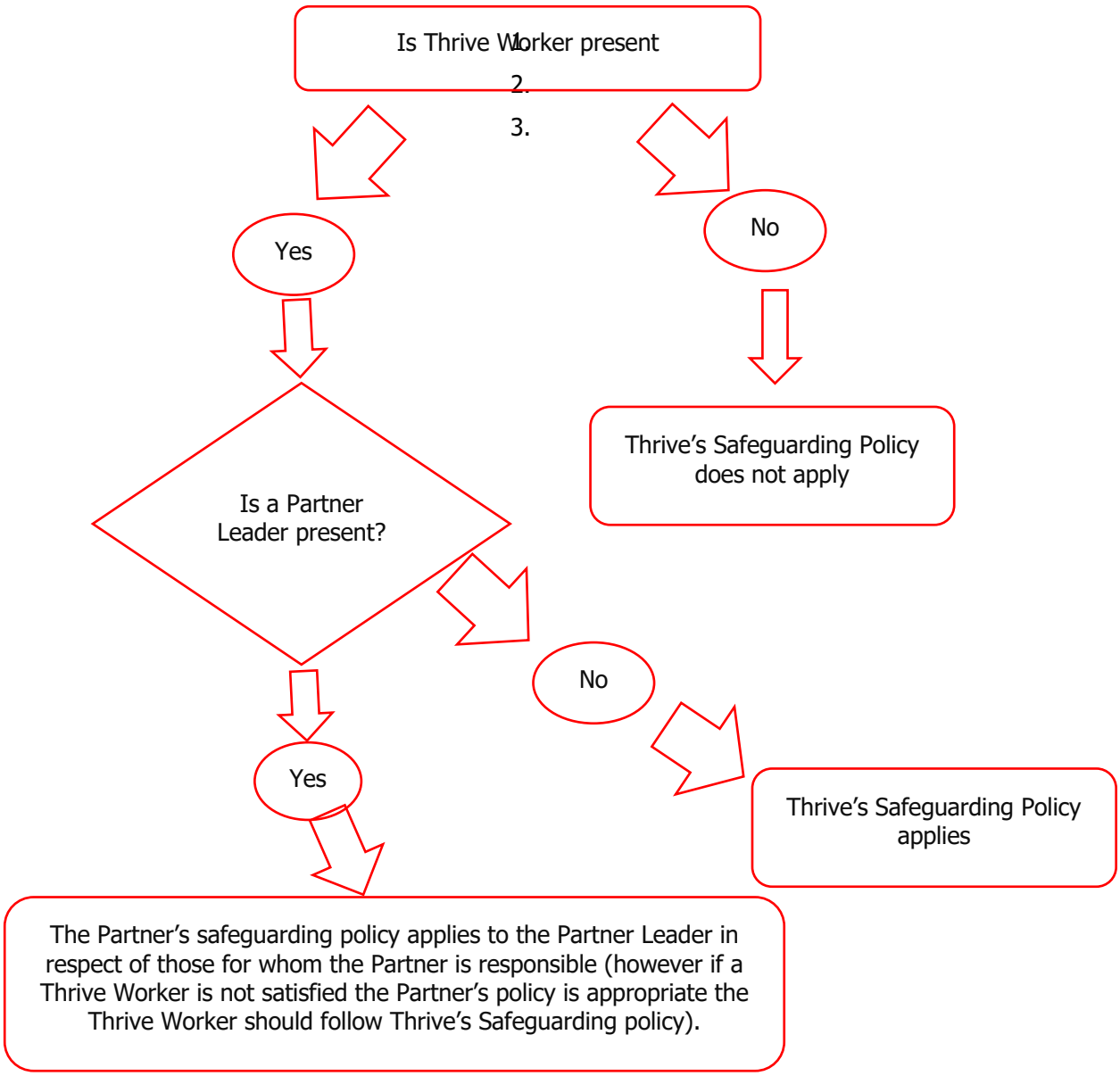
2.2.1 reference to any gender includes all genders and (unless the context otherwise requires) reference to the singular includes the plural and vice versa;

2.2.2 the expressions "*harm*", "*abuse*" and "*neglect*" are (unless the context requires otherwise) used interchangeably and in each case include the widest application of each of those words.

2.3 This Safeguarding Policy incorporates other forms, statements and policies which have been adopted by Thrive. References to these documents are **emphasised in the text**. The policies are listed in Schedule 2.

3 **When this Safeguarding Policy applies**

3.1 **Partners' policies prevail**: This Safeguarding Policy applies to any Thrive Event where a Partner Leader is not involved. If a Partner Leader is present, the Partner's Safeguarding Policy will apply to that Partner Leader and the Partner Leader should be notified of that fact by the Event Safeguarding Lead. However, if any Thrive Workers has any concerns about the efficacy of the Partner's Safeguarding Policy Thrive's Safeguarding Policy should be followed (and if appropriate Thrive's Safeguarding Lead will make any necessary notification to the Partner). Thrive Workers will not be criticised for following this Safeguarding Policy.



3.2 **Partner adherence to this Safeguarding Policy**: The Event Safeguarding Lead must ensure that each Partner has received the **Partner Organisation Safeguarding Letter**.

3.3 **Partner Lead**: Unless Thrive's Safeguarding Lead otherwise agrees (or Thrive's CEO or Thrive's Trustee With Responsibility For Safeguarding agrees), the Event Safeguarding Lead must ensure that Thrive's Safeguarding Lead (or the Event Safeguarding Lead) has received independent confirmation from the relevant Partner that each Partner Leader (i) has a current appropriate DBS check, and (ii) has satisfied the Partner's own Safeguarding Policy. Thrive requires that an Enhanced Disclosures with Barring DBS check is required for any Partner Leader who may be with young people overnight at any Thrive Event.

3.4 **Clarification of capacity**: A person involved in a Thrive Event is deemed not to be a Thrive Worker if he or she:

3.4.1 has not agreed to act in his or her capacity as an employee of, or volunteer with, Thrive in the context of the Thrive Event;

3.4.2 works or volunteers with both Thrive and the Partner (unless he or she clearly confirms that he or she is attending in his or her capacity as a representative of Thrive), or

3.4.3 is acting in his or her capacity as a Responsible Person (unless the Event Safeguarding Lead and Responsible Person agree that he or she is attending as one of Thrive Workers).

Safeguarding in practice

4 Event Safeguarding Leads and planning

4.1 **Identify the Event Safeguarding Lead**: Each Thrive Worker should ensure they know who the Event Safeguarding Lead is at any Thrive Event. Event Safeguarding Leads are the first line of report for any concerns involving (i) children or young people, or (ii) relating to the safety or well-being of any of Thrive Workers.

4.2 **Planning**: Where this Safeguarding Policy applies, Thrive Events should be planned and implemented with a view to minimising risks of:

4.2.1 any children or young people being abused or harmed, and

4.2.2 any of Thrive Workers being perceived to have abused or harmed any person.

4.3 **Period of responsibility**: In relation to each Thrive Event this Safeguarding Policy continues to apply until all children or young people have left. Thrive Workers may assume that arrangements will have been made for children or young people to leave the event at the time notified to the relevant Responsible Persons that the event will end (and that such arrangements are safe). However, these assumptions may be rebutted by the facts known at the time and appropriate measures should then be taken to safeguard the children and young people. For example, children should not usually be left unaccompanied while awaiting collection. If such a child is not collected at the end of an event, one of Thrive Workers should consult with the Event Safeguarding Lead or Thrive's Safeguarding Lead (or, if they are not available, a member of Thrive's Executive or Thrive's Trustee With Responsibility For Safeguarding) and agree arrangements for the child to be handed over to a competent Responsible Person.

4.4 **Application to all vulnerable people**: References in this Safeguarding Policy to children and young people are deemed to include references to any vulnerable person (so if a Thrive Worker is aware that an adult may be vulnerable, this Safeguarding Policy applies to dealings with that adult as it applies to dealings with children and young people).

5 Thrive Events

5.1 **Necessary documentation**: Where this Safeguarding Policy applies the Event Safeguarding Lead is responsible for ensuring that:

5.1.1 the **Event Log** is completed;

5.1.2 a **Safeguarding Poster** is clearly displayed (unless otherwise agreed by Thrive's Safeguarding Lead);

5.1.3 all Thrive Workers have received a copy of the **Workers' Pocket Guide** and **Thrive's Behaviour Code**;

5.1.4 a **Consent Form** has been completed (within the last 12 months) for each child and young person attending the Thrive Event;

5.1.5 **Thrive's Behaviour Code** is clearly communicated to all children or young people; and

5.1.6 the **Children and Young Persons Attendance Register** (unless Thrive's Safeguarding Lead confirms that this is not required for the particular Thrive Event, such as young persons' drop in event) is completed to identify all children and young persons attending the Thrive Event;

5.1.7 an **Adult Attendance Register** is completed for every adult attending the Thrive Event; and

5.1.8 a **Visitor Details Form** is completed by every adult who is not (i) a Thrive Worker, or (ii) recognised by the Event Safeguarding Lead as a Partner Leader for that Thrive Event.

5.2 **Supervision**: Activities should be organised to ensure that children and young people are always under the supervision of more than one Thrive Worker and/ or Partner Leader and/ or (where necessary and deemed appropriate on a case-by-case basis at the discretion of the Event Safeguarding Lead) a Responsible Person.

5.3 **Attendees**: If the Event Safeguarding Lead becomes aware that a person (in whatever capacity, including as a child or young person) attending a Thrive Event has abused others the Event Safeguarding Lead should implement a risk assessment with a view to putting into place measures to mitigate the risk. Those measures may include refusing the relevant person the right to attend the Thrive Event, or terminating the Thrive Event, if the risk cannot otherwise be managed in a manner that appears appropriate to the Event Safeguarding Lead.

5.4 **Behaviour Code**: If any attendee at a Thrive Event appears to have insufficient competence to abide by **Thrive's Behaviour Code** then a concerned Thrive Worker should (i) take reasonable steps to protect that person and other children or young people, and (ii) notify the Event Safeguarding Lead.

5.5 **Access to children and young people**: Visitors should not be given unsupervised access to children and young people in respect of whom they are not the Responsible Person.[1]

5.6 **Safe working places**: Thrive Workers are encouraged to ensure that where this Safeguarding Policy applies they work in public areas so that contact between children or young people and Thrive Workers is in sight of another of Thrive Workers, a Partner Leader or another Responsible Person. If a Thrive Worker needs to leave an area where he or she was requested to be by the Event Safeguarding Lead or becomes aware that a child or young person is leaving an area that he or she is expected to be in (perhaps to go to the toilet or to talk with somebody) the Thrive Worker should seek to ensure that other Thrive Workers who may be affected are made aware of the circumstances. Generally children should be encouraged not to leave an area unless accompanied by one of Thrive Workers (although the practical requirements and difficulties involved are acknowledged).

5.7 **Conduct**: Thrive Workers should adhere to **Thrive's Behaviour Code** and not drink or smoke or consume, use, promote or share any recreational substance or any pornographic or illegal material in their capacity as Thrive Workers or act at any time in a way that may bring them or Thrive into disrepute.

1.2 **Photography**: Photographs (which for these purposes includes video and other images showing a recognisable likeness of an individual) should only be taken by a person authorised by Thrive (and who has agreed to provide all copies of the photographs to Thrive) and young people and guardians of children should have the opportunity to request that they (or the children of whom they have guardianship) should not be photographed and, if they request that photographs are not taken of them, such requests should be respected (and notified to those who may otherwise take photographs). Publication of photographs from which individuals may be identified should only be made with the consent of the individuals or (where appropriate, their guardians).

5.8 **Transport**: Children or young people should not usually be offered transport by Thrive or a Partner unless a Responsible Person has given written consent (which may be given on Thrive's **Transport Consent Form**). Unless the Responsible Person (or Thrive's Safeguarding Lead) clearly agrees to the contrary, where transport is provided to a child or young person that person must be accompanied by at least two adults at least one of whom must be a Thrive Worker or a Partner Leader. If Thrive's **Transport Consent Form** is not completed then in exceptional circumstances a Thrive Worker may decide that arranging transport presents a lower risk than not arranging transport. Before making such a decision, the Thrive Worker should, attempt to consult with the Responsible Person, Thrive's Safeguarding Lead, the Event Safeguarding Lead or other competent representative of the Partner. In those exceptional cases, details of the reasons for the decision, the arrangements made (including the start and destination, time of the journey, others in the vehicle and steps to ensure that the journey transport is appropriate) should be provided to the Event Safeguarding Lead (who will then advise Thrive's Safeguarding

[1] An exception may be made for a person who is collecting a child or young person where (i) that collection is anticipated, expected and accepted by the relevant child or young person, and (ii) there is nothing outwardly untoward in the collection arrangement.

Lead). In all cases that transport is arranged by Thrive for a child or young person, the Thrive Worker responsible for making the arrangements should ask the driver to confirm that he or she has a full UK driving licence, is lawfully able to drive the relevant vehicle, has appropriate insurance, is over 21 years old and that the vehicle is roadworthy. The fact that these questions have been asked, and the responses, should be recorded in the Event Log (together with details of the driver and all other persons sharing the transport).

5.9 **After the event**: Complete and send the Event Log to Thrive's Safeguarding Lead.

6 Communications with children or young people

6.1 **Introduction**: Children or young people may seek to confide in Thrive Workers. This Section 6 includes guidance as to what Thrive Workers should do in such circumstances.

6.2 **Do not make a promise that cannot be kept**: Thrive Workers should not agree to any arrangement which may result in a confidence being breached as a result of something which is disclosed being reported to Thrive's Safeguarding Lead (i.e. do not "*promise to keep a secret*" – instead, consider saying "*if I am concerned by what I hear I will have to notify colleagues or others who may be able to help*" or "*I am not allowed to give you that assurance, but I will only share things that I am required to share by Thrive's policy for keeping people safe*", by saying this sort of thing a notification may still properly be made in accordance with Section 11.2). If the relevant person insists that the information may not be passed on, then refer to Thrive's Safeguarding Lead, but do not accept a restriction on any ability to provide a notification which may be required by this Safeguarding Policy.

6.3 **Where to listen**: Thrive Workers should not agree to listen in a way which may put them in a compromising position (for example, it may be inappropriate to hold a discussion in a private place where it is not possible to have independent verification that the Thrive Worker acted appropriately). If we cannot arrange a suitable place and means to listen we may refer the child or young person to one of the agencies referred to in Section 16 (*External agencies which may be consulted*).

6.4 **How to listen**: Thrive Workers are encouraged to give the time to listen without being judgmental. When listening, Thrive Workers should allow the person time to talk freely, without concern that anybody (other than Thrive Workers and identified Partner Leaders) may hear what they say. It is, however, in these circumstances wise to have more than one responsible adult present (see next Section). The child or young person should be treated sympathetically, with respect and acceptance and allowed to continue until it appears that they have said all they want to say. However, care should be taken not to put words into the person's mouth or use a tone of voice indicating shock, anger or disbelief. Thrive Workers and Partner Leaders should accept what is being said at "face value" (and not ask questions, other than to clarify what is being said). Any of Thrive Workers or Partner Leader should remain as a companion for so long as the children and young people appears distressed.

6.5 **Seek support**: As soon as it becomes apparent that any form of counselling or potentially compromising or revealing discussion may evolve, Thrive Workers should seek to ensure that another Thrive Worker, Partner Leader or another independent, competent and trusted adult is made aware of the circumstances and able to monitor by sight (even if not hear) the discussion.

6.6 **Records:** Wherever possible contemporaneous notes should be taken. Where that is not practical the pertinent information from the relevant interaction should be noted in writing as soon as practicable. The **Safeguarding Concern Notes** template may be helpful. Such notes should be shared with Thrive's Safeguarding Lead (or provided to the relevant Event Safeguarding Lead who shall liaise with Thrive's Safeguarding Lead).

6.7 **Sharing communications**: Thrive Workers must (if requested to do so by Thrive's Safeguarding Lead, Thrive's Executive or the Thrive Trustee With Responsibility For Safeguarding) share all communications available to them with or involving children or young people (and not willingly delete any such communications which may reasonably be expected to be requested to be so shared).

6.8 **Concern of abuse**: Any concern that a child or young person may have been abused or be at risk of abuse should be reported in accordance with the requirements of Section 12 of this Safeguarding Policy.

7 Relationships, gender and sexual concerns

7.1 **The risk**: Thrive Workers are in a "relationship of trust" with children and young people and at risk of allegations of sexual or other abuse. Thrive Workers should take action to reduce the risks of such abuse occurring (or being alleged to have occurred). Thrive Workers having this position of trust may have significant power, authority and influence over children and young people and other vulnerable persons and it is vital that they do not, even unknowingly, use that power, authority or influence inappropriately. It is important always to maintain professional boundaries and avoid behaviour which could be misinterpreted. Thrive Workers should specifically be aware that it is illegal for those in "Positions of Trust in a faith setting" to engage in sexual activity with a person who is under 18 years old who is under their care or supervision.

7.2 **Respect and dignity**: Thrive Workers should respect the dignity of others at all times and encourage others to deal with one another in a similar way (for example, bullying and ridiculing are discouraged, and constitute a breach of the **Thrive's Behaviour Code**). Thrive Workers should always use appropriate language and tone of voice and ensure that their body language is also appropriate, and take care not to do or say things which children and young people may perceive as constituting rejection of them or of a person with whom they may have any relationship or dealing. Anything that is sexually suggestive, discriminatory, demeaning, unreasonably threatening, invades personal space, provocative, derogatory, rough or ridiculing should be expected to be treated as inappropriate (even if intended as a joke or to be humorous). Thrive Workers should not endorse anti-social, unlawful or non-Christian behaviours. Everybody who attends a Thrive Event (including Thrive Worker, Partner representatives and children and young people) should adhere to the applicable behaviour code (that a person may be vulnerable does not of itself operate to exonerate that person from adhering to the applicable code, however exceptions may have to be identified for children and young people who are identified as not being competent to have sufficient self-control).

7.3 **Avoid appearance of special relationships**: Thrive Workers should avoid forming "exclusive" or "special" relationships or behaving in a way which may be construed as showing inappropriate favouritism toward or discrimination against individual participants (or groups of participants who share gender, age or other notable characteristics). Relationships (and perception of relationships) between Thrive Workers and children and young people which may be construed as being inappropriate (whether as a being of a sexual nature or otherwise) should be avoided. Thrive Workers should not seek to meet with children and young people outside of Thrive Events unless such meeting is clearly approved by a Responsible Person (and then it is recommended that such meetings are held in open venues with the Responsible Person in attendance or with another adult approved by the Responsible Person).

7.4 **Be aware of how relationships develop**: Relationships may develop through any communication, whether in person, orally or in writing (including telephone, text messaging and social media). To mitigate risk, communications should be avoided other than to the extent necessary to make logistical arrangements relating to a Thrive Event, communicate information to a group or to provide polite acknowledgement of unsolicited communications. Such communications should be polite, dispassionate and prepared mindful of **Thrive's Data Protection Policy and Privacy Notice** and this Safeguarding Policy and it may be appropriate (for the protection of the person sending the communication) to copy such communications (and acknowledgements) to another Thrive Worker. Where there is any doubt as to the appropriateness of the communication, copies should be sent to Thrive's Safeguarding Lead.

8 Physical contact

8.1 **Corporal punishment prohibited**: The use of any corporal punishment is strictly prohibited i.e. any form of physical discipline is not acceptable.

8.2 **Physical contact**: It is normally inappropriate for adults to initiate physical contact with participants. Thrive Workers should be cautious of contact initiated by children and young people

(see Section 8.5). Physical contact may be warranted (subject always to the requirements of Section 8.3) in certain circumstances, such as to the extent required to:

8.2.1 provide comfort, reassurance or condolence (for example by way of holding hands or "side-ways hug": sitting all but the very youngest children on an adult's knee or lap is not generally encouraged);

8.2.2 provide medical assistance or assistance after an accident;

8.2.3 manage "incidents" where a child or young person is at risk (or puts another person at risk) or otherwise prevent harm which cannot otherwise reasonably be mitigated in a timely and efficient manner.

8.3 **Minimum contact**: Any physical contact should be an appropriate response and proportionate to the need and involve the minimal touch reasonably required for the minimum time necessary to achieve the objective. Wherever possible physical contact should be witnessed by another of Thrive Workers (or a Partner Leader or another independent, competent and trusted leader or volunteer). Where physical contact which could possibly be deemed inappropriate or a cause for concern is made or alleged by any person at a Thrive Event, details should be recorded in the Event Log.

8.4 **Securing consent**: Subject to overriding health and safety concerns, Thrive Workers should obtain consent from the child and young person (or, if a Responsible Person in relation to that child and young person is present, from that Responsible Person) before initiating any physical conduct (a nod of assent or reaching out a hand may constitute consent). It is recommended that the giving of consent is confirmed orally in a way which would allow anybody in close proximity to hear that consent has been requested and given. The giving of consent by a Responsible Person for children and young people should be recorded in the Event Log.

8.5 **Children and young people initiated physical contact**: Great care should be taken if a child young person seeks physical contact. Ensure that there is no risk of impropriety in accepting such a request and ensure that any such physical contact is in plain view of other Thrive Workers. If a Responsible Person in relation to that child or young person is present, that Responsible Person should be asked to provide the physical reassurance or comfort or assent to the Thrive Worker member doing so. Section 8.3 applies equally to physical contact initiated by children and young people. Thrive Workers should be aware that children and young people may seek excessive attention (or seek overtly physical or sexual attention) as a result of abuse or neglect.

8.6 **Action to take following physical contact**: If following physical contact a Thrive Worker has any concerns that an allegation of inappropriate behaviour may be made, the incident, including details of all relevant circumstances, should be recorded (preferably in writing) by all Thrive Workers with any knowledge of the incident and reported to Thrive's Safeguarding Lead as soon as practicable (and consideration should be given to requesting others who are not children or young people who were involved to provide an account, too). Thrive's Safeguarding Lead will keep a record of such concerns.

9 Exclusion

9.1 **Event Safeguarding Lead may ask others to leave**: It may sometimes be appropriate for an Event Safeguarding Lead to ask a person to leave a Thrive Event to which the Safeguarding Policy applies. Event Safeguarding Leads may ask any person (including Thrive Workers) to leave an event in order to protect the interests of anyone. There are various circumstances in which an Event Safeguarding Lead may consider it appropriate to ask a person to leave a Thrive Event, including for (i) protection of the person who is asked to leave or (ii) where the person who is asked to leave is in breach of **Thrive's Behaviour Code**. If a person is asked to leave this should be recorded in the Event Log.

9.2 **What to do if asked to leave (adults)**: Thrive Workers and other adults asked by an Event Safeguarding Lead to leave should do so without demur. An adult may be asked to leave even if they have not contravened any rule (and the fact that a person has been asked to leave should not of itself be construed as censure of that person).

9.3 **What to do if asked to leave (children and young people)**: If an Event Safeguarding Lead asks a child (or a young person for whose safety the Event Safeguarding Lead is concerned) to

leave before the scheduled end time of a gathering, arrangements should be made for transfer of the duty of care for the child (or, where relevant, young person) to a Responsible Person.

Identifying notifiable risks and taking appropriate actions

10 Identifying risk of neglect, abuse or harm

10.1 **Suspicion of risk of neglect, abuse or other harm**: Children and young people may disclose circumstances giving rise to a suspicion that a person (who may or may not be present at the time of the discussion) may be at risk of abuse or other harm. Relevant circumstances may reveal physical, emotional, sexual, spiritual or peer-to-peer abuse, neglect, slavery, bullying or self-harm. This is not a definitive list: Schedule 1 includes assistance in identifying neglect, abuse or other harm.

10.2 **Privacy and "tipping-off"**: Thrive Workers should recognise individuals' rights to privacy and respect and also avoid "tipping-off" (i.e. alerting to the fact of a concern) a person who may be involved in any suspected abuse or harm (or who may have an interest in denying that such abuse or harm is occurring). If contact with the child or young person continues after disclosure, contact should be maintained on as 'normal' a basis as possible, and Thrive Workers should avoid seeking to return to the subject (unless the child or young person initiates further discussion).

11 What to do

11.1 **What to do if imminent risk is suspected**: If it is suspected that there is an immediate risk of harm to a child or young person a Thrive Worker should seek to separate the relevant person from the immediate or acute risk (taking care not to expose yourself to risk) and make a notification as described in Section 12. If dictated by common sense (which would apply absent this Safeguarding Policy) seek immediate assistance from an appropriate external government, medical or care agency. Do not take any other action unless instructed to do so by your Event Safeguarding Lead (or Thrive's Safeguarding Lead, a member of Thrive's Executive, Thrive's Trustee With Responsibility For Safeguarding, the police or other Governmental agency). For these purposes a person is in "*immediate risk*" if remaining in the current environment or allowing the person to leave the current environment would result in a risk of immediate or imminent harm (for example, risk posed by another person with whom they have contact).

11.2 **What to do if abuse is suspected**: Sections 13 and the information in Schedule 1 are designed to assist Thrive Workers to identify whether circumstances may constitute abuse (or risk of abuse). If in doubt, Thrive Workers are encouraged to be cautious and make a notification in accordance with this Safeguarding Policy. If it is suspected that a person may have been abused or may be at risk of harm (or that another person is at risk of criticism in relation to the safeguarding of children and young people) make a notification as described in Section 12.

12 Making a notification

12.1 **Who to notify**: Thrive Worker's should usually (unless either of Sections 12.2 and 12.3 applies) first notify the relevant Event Safeguarding Lead. If it is not possible (or potentially inappropriate) to notify the Event Safeguarding Lead, notification may instead be given to Thrive's Safeguarding Lead, a member of Thrive's Executive or Thrive's Trustee With Responsibility For Safeguarding (contact details are included in Section 14.1).

12.2 **Where suspicion implicates a Thrive employee**: If suspicions implicate an employee of Thrive then the report should be made to Thrive's Trustee With Responsibility For Safeguarding or the Chair of Thrive's Trustees.

12.3 **Where suspicion implicates a Thrive Trustee**: If suspicions implicate any of Thrive's Trustees then the report may be made in the first instance to thirtyone:eight who can be contacted 0303 003 1111 (address: PO Box 133, Swanley, Kent, BR8 7UQ), or alternatively Social Services or the police may be contacted.

12.4 **Who not to notify**: Except to the extent that an Event Safeguarding Lead requests a "debrief" amongst those members of Thrive Workers and Partner Leaders involved in (or who have knowledge of) the relevant circumstances, suspicions of harm, abuse or other safeguarding related concern must not be discussed by any Thrive Worker (or Partner Leader) with anyone other than the Event Safeguarding Lead, Thrive's Safeguarding Lead, Thrive's Trustee With

Responsibility For Safeguarding, Thirtyone:eight, the police, social services or other government agency.

12.5 **What to notify**: When notifying a concern please make sure that the person to whom the report is being made (see Section 12.4) understands that that your communication constitutes notification of a safeguarding concern. The concern should be recorded in a **Safeguarding Concern Note**. As much information as possible should be provided, this will probably include identification of all relevant persons, details of concern, relevant circumstances and reasons for the notification. The notification may be based on no more than an "uncomfortable feeling" and that is sufficient reason. If a child or young person communicated things giving rise to the concern, include what was actually disclosed, others who may have relevant information and who else has been informed (or it is suspected may be aware of the circumstances or concerns). Ideally the notification will record what was said in as verbatim a way as is possible. A notification may initially be made orally, but it is always helpful if details are written down and provided to the Event Safeguarding Lead, as soon as practicable.

12.6 **What to do next**: There should not be any reason for Thrive Workers to go beyond notification mentioned in Sections 12.1 to 12.3 (it is for the person to whom the notification is given to make further enquiries and notifications). Thrive Workers should not expect to hear anything further – safeguarding must be discrete, and this discretion may mean that the person making the report is not told of any outcome. Please do not be discouraged by this.

12.7 **Support for Thrive Workers**: If a Thrive Worker is emotionally affected by a safeguarding concern which arises whilst working with Thrive they should tell Thrive's Safeguarding Lead (or a member of Thrive's Executive or Thrive's Trustee With Responsibility For Safeguarding). Thrive may recommend that counselling or other support is appropriate.

12.8 **Concerns about process**: Any Thrive Worker who is concerned about the way an allegation or disclosure has been handled should contact Thrive's Trustee With Responsibility For Safeguarding or the Chair of Thrive's Trustees (see Section 14).

13 What the person to whom notification is made should do

13.1 **Upward reporting**: If a notification of suspected abuse or harm is made to an Event Safeguarding Lead (or other person pursuant to Section 12.1) that person should forward the report to Thrive's Safeguarding Lead.

13.2 **What the person receiving the notification should do**: Thrive's Safeguarding Lead (or where appropriate Thrive's Trustee With Responsibility For Safeguarding or the Chair of Thrive's Trustees) will (to the extent possible) be able to assimilate the information provided with other relevant information and, where appropriate, refer the necessary details to Thrive's safeguarding advisors (currently Thirtyone:eight) and/ or take such other action as they consider to be appropriate.

13.3 **Allegations against a Thrive Worker**: If the allegation relates to action by a Thrive Worker, then Thrive's Safeguarding Lead (or where appropriate Thrive's Trustee With Responsibility For Safeguarding or the Chair of Thrive's Trustees) should consider liaising with the Adult Social Services and/ or referring the circumstances to the Local Authority Designated Officer and/or notifying HM Government's Disclosure & Barring Service.

13.4 **Safeguarding Register:** Thrive's Safeguarding Lead should note any notification of safeguarding concern (and any action, advice received or steps taken in relation to it) in the **Safeguarding Register** as soon as practicable. If a concern is notified to Thrive's Trustee With Responsibility For Safeguarding or the Chair of Thrive's Trustees then the recipient should keep a note of all relevant details, advice received and steps taken and shall share those notes with at least one of (i) Thrive's Safeguarding Lead, (ii) another Thrive Trustee and/or (iii) the CEO of Thrive (as in each case appears appropriate to the person receiving the notification of concern, having regard to Section 10.2, which relates to "tipping-off").

13.5 **Notifying insurers**: Where appropriate (for example, where, were an allegation to be substantiated, it could result in Thrive incurring financial liability), Thrive's Safeguarding Lead should recommend to Thrive's Trustee With Responsibility For Safeguarding (or the Chair of Thrive's Trustees) that a matter is referred to insurers (and a note of that recommendation should maintained in the **Safeguarding Register**).

13.6 **Notification to Thrive's Trustee With Responsibility For Safeguarding:** Thrive's Safeguarding Lead should notify Thrive's Trustee With Responsibility For Safeguarding (or the Chair of Thrive's Trustees) of any safeguarding concerns (this may, but does not need to, include confidential information). Thrive's Trustee With Responsibility For Safeguarding (or the Chair of Thrive's Trustees) should consider reporting the circumstances to Thrive's insurers. Details of such referrals should be kept in the **Safeguarding Register** by Thrive's Safeguarding Lead.

13.7 **Consideration of appropriateness of external referral**: It is not the role of any Thrive Worker (other than Thrive's Safeguarding Lead, Thrive's Trustee With Responsibility For Safeguarding or the Chair of Thrive's Trustees, as in each case appropriate) to determine if a threshold of abuse has been reached in relation to a disclosure or allegation, nor (except to reduce the risk of immediate harm as contemplated in Section 11.1) to make a decision about the disclosure based on their assessment of other information held.

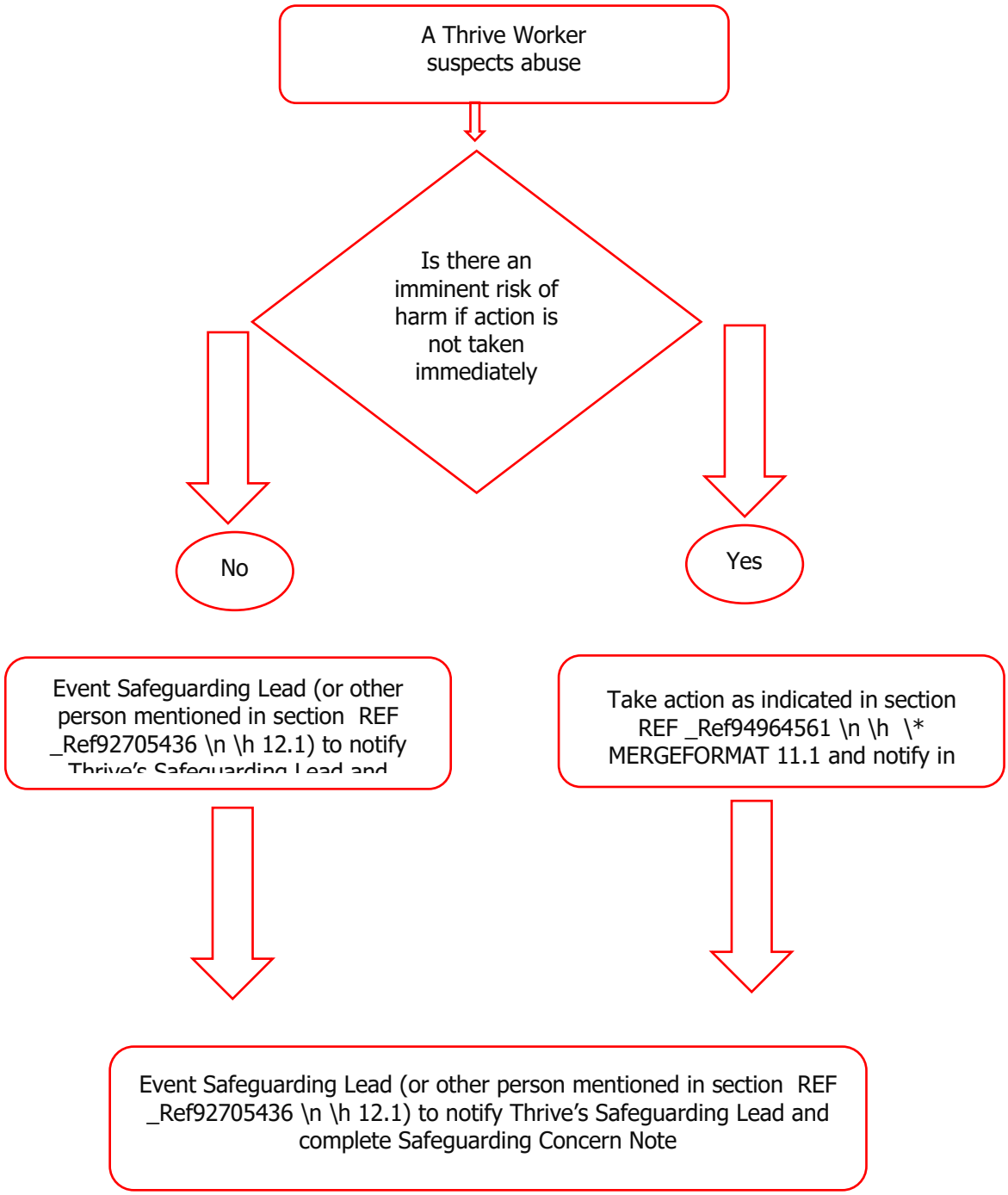
13.8 **Notification of referral**: If a referral is made to an external agency the fact of the referral (with, where appropriate, the details anonymised) should be reported to Thrive's Executive and Thrive's Trustees. Details of such referrals should be kept in the **Safeguarding Register** by Thrive's Safeguarding Lead.

13.9 **Log of notifications**: Thrive's Safeguarding Lead should ensure that a comprehensive written record of all concerns of abuse notified by Thrive Workers, and actions taken as result of the notification are kept in the **Safeguarding Register** by Thrive's Safeguarding Lead. This record should be maintained in confidence and in accordance with applicable Data Protection laws and **Thrive's Data Protection Policy and Privacy Notice** (available at https://www.thriveym.org.uk/privacy-policy/).

13.10 **Disclosure of notifications**: Notifications of safeguarding concerns may be shared with Thrive's CEO or Thrive's Trustee With Responsibility For Safeguarding, or with any other person to the extent required by law. With the consent of Thrive's CEO or Thrive's Trustee With Responsibility For Safeguarding, and with details anonymised (except to the extent that they are required in order to satisfy the purpose of disclosure), notifications may also be disclosed to an Event Safeguarding Lead (or Partner Leader) to the extent that Thrive's Safeguarding Lead (or Thrive's CEO or Thrive's Trustee With Responsibility For Safeguarding) believes that such disclosure is appropriate in order to implement appropriate safeguarding arrangements. The Thrive Leader may exercise discretion to communicate relevant information to Thrive Workers to the extent that he or she deems it appropriate to implement appropriate safeguarding arrangements. Information included in a notification should be shared in a strictly limited way on a "need to know" basis.

13.11 **Follow up action**: Following discussion with Thrive's safeguarding advisors it may be agreed to consult or give notification to other external specialist agencies. Examples and contact details of these are included in Section 16.

Flowchart for notification process



Contact details

14 **Thrive internal contacts**

14.1 At the time of publishing this document (Summer 2024), the following contact details apply:

14.1.1 **Thrive's Safeguarding Lead** is Fiona Stutton, tel 07901 776222 or fiona@thriveym.org.uk

14.1.2 **Thrive's Trustee** with overall responsibility for safeguarding is Sam Davis, 07738 097707 or safeguarding@thriveym.org.uk; and

14.1.3 **Thrive's CEO** is (at the date of adoption of this Safeguarding Policy) Andy Castle, tel 07904 070658 or andy@thriveym.org.uk

14.2 **Thrive's Trustees** and other groups within Thrive may share generic email addresses, these should **not** be used for safeguarding concerns. Please be aware that such emails may be forwarded automatically to other members of the Thrive team and Thrive Workers.

14.3 **Thrive's details:**

14.3.1 **main office** address is Rear of Whitnash Methodist Church, Murcott Road East, thr Leamington Spa, CV31 2JJ

14.3.2 **telephone** 01926 257118

14.3.3 **email info@thriveym.org.uk**We do not encourage use of generic Thrive email contact addresses for making safeguarding requests of reports

14.3.4 **charity number**: 1145794

15 **Thrive's insurance brokers: Markel International Insurance Company Limited**

15.1 Tel: 0800 640 6600 or Legal Expenses 0333 2342 046
Email: customerservice@markeldirect.co.uk. Or claimsuk@markel.com
Policy number: CD30573
Policy summary: Insurance policy for Charities and Community Groups: Public Liability, Employer's Liability, Property Damage, Portable Damage

15.2 **Updated details**: Please check these contact details by referring to Thrive's website https://www.thriveym.org.uk/.

16 **External agencies which may be consulted**

16.1 **thirtyone:eight:** Thrive's safeguarding advisers:

PO Box 133, Swanley, Kent, BR8 7UQ.
Tel: 0303 003 1111
Email: info@thirtyoneeight.org

16.2 **Childline**. If a child or young person is distressed and unwilling to talk with a Thrive Worker, a Thrive Worker may refer them to Childline. The contact details are:

Tel: - 0800 1111
Web: - www.childline.org.uk

16.3 **National Whistleblowing Advice Line**

Tel: 0800 028 0285

16.4 **Non-Emergency NHS**

Tel: 111

16.5 **Warwickshire Children's Social Services**

Tel: 01926 414144.
Lines are open Monday to Thursday 8.30am - 5.30pm, Friday 8.30am - 5.00pm.
Out of hours Emergency Duty Team Tel: **01926 886922**.

Website Address: https://www.safeguardingwarwickshire.co.uk/safeguarding-children

16.6 **Warwickshire** Adult Social Services

Tel: 01926 412080.

Website Address: https://www.warwickshire.gov.uk/safeguardingadults

16.7 **Police – Non-Emergency**

Tel: 101

16.8 **Coventry Children's Social Services**

Tel: If there is no immediate danger or you need advice or information, you should call the Multi-Agency Safeguarding Hub on 024 7678 8555.
Out of hours Tel: 024 7683 2222
Website Address: https://www.coventry.gov.uk/coventry-local-safeguarding-children-board/coventry-safeguarding-children-board/4

16.9 **Coventry Adult Social Services**

Tel: 024 7683 3003 or email ascdirect@coventry.gov.uk.

Website Address: https://www.coventry.gov.uk/safeguarding-adults-1/worried-someone-know-harmed-neglected/2

16.10 **Coventry Police Protection Team**

Tel: 101
Out of hours Tel: 999
binleyandwillenhall@westmidlands.police.uk

Website Address: https://www.west-midlands.police.uk/ and

https://www.west-midlands.police.uk/team-postcodes-search?field_post_code_areas_value=cv35

Coventry Central Police Station
Little Park Street
Coventry
CV1 2JX

16.11 **Designated officer or LADO (Local Authority Designated Officer)** (if the allegation concerns a worker or volunteer working with someone under the age of 18).

Tel: 01926 745376
Email: lado@warwickshire.gov.uk

Website Address: https://www.warwickshire.gov.uk/childrens-social-care/child-safeguarding-procedures-professionals/4

16.12 **Charity Commission**:

Tel: 0300 066 9197
Email Address: enquiries@charitycommission.gov.uk

https://www.gov.uk/government/organisations/charity-commission

Charity Commission for England and Wales PO Box 211 Bootle L20 7YX

Approving Thrive Workers to work with children or young people

17 **Thrive Workers engagement**

17.1 **Standards**: Thrive seeks to uphold the best standards in relation to working with children or young people. These standards (as updated from time to time) are deemed incorporated in this Safeguarding Policy. This includes complying with:

17.1.1 HM Government "Working Together to Safeguard Children (2023)";[2]

17.1.2 safeguarding duties under the Care Act 2014;[3]

17.1.3 the Code of Practice established by the DBS.[4]

17.2 **Overall responsibility**: Unless otherwise stipulated by Thrive's Executive (or Thrive's Trustee With Responsibility For Safeguarding) Thrive's Safeguarding Lead has overall responsibility for safeguarding to oversee the "due diligence" (or "vetting") process ahead of approving the appointment of any Thrive Worker. This includes identity verification and the online processing of appropriate DBS checks. Thrive requires Enhanced Disclosures with Barring DBS check is required for any Thrive Worker who may be with young people overnight at any Thrive Event. Thrive's Executive or Thrive's Trustee With Responsibility For Safeguarding may appoint another person to undertake this "due diligence" (and are likely to do so if Thrive's Safeguarding Lead is an employee and the relevant person is applying to be an employee of Thrive).

17.3 **Vetting**: Unless otherwise agreed by Thrive's Safeguarding Lead (after consulting Thrive's CEO or Thrive's Trustee With Responsibility For Safeguarding) no Candidate may become a Thrive Worker until the vetting procedures outlined in this Part have been completed satisfactorily. If dispensation from the requirements of the vetting procedures set out in this Part is given, that dispensation may be granted subject to conditions and on the basis that the full vetting process is completed subsequently.

17.4 **Consent**: Before the vetting process starts, Thrive's Safeguarding Lead should ensure that any Candidate who may be employed by Thrive has received a copy of this Safeguarding Policy and agreed to the vetting processes contemplated in it being undertaken and signing the **Application Form**. In other instances Candidates must be given access to this Safeguarding Policy.

17.5 **Pre engagement vetting -** A person may not usually (see Sections 17.3 and 17.6) be employed by or volunteer to represent Thrive in any capacity dealing with children or young people (a "**Candidate**")[5] unless and until:

17.5.1 a satisfactory Enhanced Disclosure barring check (including 'Child Workforce') has been obtained from the HM Government's Disclosure & Barring Service; and

17.5.2 at least two references have been obtained from people who Thrive's Safeguarding Lead, Thrive's CEO or Thrive's Trustee With Responsibility For Safeguarding believe it is reasonable to rely on to give a fair assessment of the Candidate's character and

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[2] See - https://assets.publishing.service.gov.uk/media/65cb4349a7ded0000c79e4e1/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf

[3] See - Care Act 2014 (legislation.gov.uk) https://www.legislation.gov.uk/ukpga/2014/23/part/1/crossheading/safeguarding-adults-at-risk-of-abuse-or-neglect/enacted, and Care and support statutory guidance - GOV.UK (www.gov.uk) https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance

[4] DBS code of practice - GOV.UK (www.gov.uk) https://www.gov.uk/government/publications/dbs-code-of-practice

[5] People in supporting roles (such as catering teams) will be deemed not to be dealing with children or young people if they will not at any stage be engaged in face-to-face activity with a vulnerable person when one of Thrive's Representatives (or properly authorised Partner Leader) is not also present. Note some roles, such as cleaners and first aid providers, may be expected to have access to unaccompanied vulnerable persons, and so should be considered to be dealing with vulnerable people.

experience. Communication with referees should be in the form of the **Reference Request Form.** If a requested reference is not forthcoming or a reference is caveated that may constitute a "red flag" which should (if the Candidate's application to become a Thrive Worker is otherwise likely to be approved) be brought to the attention of Thrive's CEO and Thrive's Trustee With Responsibility For Safeguarding before the Candidate's application is approved;

17.5.3 in the case of a Candidate who is applying for an employed role with Thrive:

17.5.3.1 the veracity of any professional qualifications, previous employment history or other material claims made by the Candidate have been established;

17.5.3.2 Thrive's Executive team (with the approval of the Chair of Thrive's Trustees (or Thrive's Trustee with responsibility for human resources, if any)) has determined via interview that the Candidate has appropriate experience, aptitude and motivation for working with Thrive and having involvement with children or young people; and

17.5.4 in the case of a Candidate who is not applying for an employed role with Thrive, Thrive's Safeguarding Lead following consultation where appropriate with other members of Thrive's Executive or Thrive's Trustee With Responsibility For Safeguarding has determined that the Candidate has appropriate aptitude and motivation for the relevant volunteer role and may safely be appointed to have involvement with children or young people.

17.6 In extraordinary circumstances a person may be approved by Thrive's Safeguarding Lead to deal with children or young people before the vetting process has been completed (the approval may be subject to conditions and must be recorded in writing, email is sufficient, and noted as required in Section 17.7). Unless otherwise agreed by Thrive's Safeguarding Lead, the approval must be based on a written risk assessment specifying the role that the individual may assume.

17.7 Thrive's Safeguarding Lead shall maintain in the **Safeguarding Register** details of all Thrive Workers who have been approved by the vetting process (or who have been given extraordinary approval in accordance with Section 17.6, and any applicable conditions) (including in each case the date of approval) and shall keep in the **Safeguarding Register** a note of all training provided to each of Thrive Workers. If an approval is withdrawn or lapses, that fact should be clearly recorded in the **Safeguarding Register**. The **Safeguarding Register** should also include details of Candidates who have not been approved. The **Safeguarding Register** should be maintained in confidence and in accordance with **Thrive's Data Protection Policy and Privacy Notice**.

18 Role specification

18.1 All Thrive Workers should ensure that they understand the nature and scope of their role in each given situation.

18.2 All Thrive's employees will be issued with written job descriptions. Volunteer members of Thrive Workers may also be given formal job descriptions or profiles but this is not a requirement, if no profile is given the volunteer should nevertheless ensure that they are comfortable that they know their role in the context of dealing with children or young people.

19 Probation, guidance, training and review

19.1 **Probationary period**: Volunteers who join Thrive Workers may be appointed subject to a probationary period during which it is expected that they will be supervised in their conduct and dealings with children or young people. Thrive Workers who are employed by Thrive will be appointed with a probationary period of at least three months. Any probationary period may be extended.

19.2 **Training**: Thrive's Safeguarding Lead will assist Thrive's Executive to ensure that appropriate training is made available to all Thrive's Trustees and Thrive Workers regarding the safe care of children and young people, including improving understanding of the prevalence of, and signs, symptoms and indicators of, abuse. What is appropriate in the context of each Thrive Worker will be determined by Thrive's Safeguarding Lead, having reference to the role undertaken and the supervision expected to be provided. Any Thrive Worker may request additional training.

Training may include updates on current best practice, consultation in relation to situations encountered by Thrive Workers in practice and encouragement for the sharing of ideas and concerns. If as a Thrive Worker it appears that training may be helpful or necessary, please notify Thrive's Safeguarding Lead. Thrive's Safeguarding Lead should maintain details of all Thrive Workers safeguarding training in the **Safeguarding Register**. Thrive Workers who receive safeguarding training otherwise than from Thrive, are requested to notify Thrive's Safeguarding Lead so that the fact of the training can be noted in the **Safeguarding Register**.

19.3 **Guidance**: It is Thrive's responsibility to offer Thrive Workers guidance and supervision, Thrive Workers should ask for assistance whenever in need of it. Updates, training and instructional materials produced by Thirtyone:eight should be signposted to all Thrive Workers and links to these included in communications to Thrive Workers. A Thrive Worker who requires guidance or supervision should request it from Thrive's Safeguarding Lead.

1.3 **Whistleblowing**: Thrive is committed to the highest standards of integrity, transparency, and accountability. Thrive encourages Thrive Workers to raise safeguarding, health and safety and related concerns with Thrive's Safeguarding Lead (or Thrive's CEO or Thrive's Trustee With Responsibility For Safeguarding) rather than overlooking a potential problem. Thrive Workers are requested to provide notifications in writing. Notifications will be handled in accordance with **Thrive's Whistleblowing and Concerns Policy**.

19.4 **Full review after break**: Thrive Workers who have had a break in service of more than 13 months will be treated as new Candidates (however if there is no reason to question the ongoing validity of a pre-existing appropriate DBS check previously undertaken by Thrive which would otherwise not need to be reviewed, that DBS check may be relied on).

20 Reviews and updates

20.1 **Regular reviews of Thrive Workers**: Thrive's Safeguarding Lead is responsible for ensuring that Thrive's Executive or Thrive's Trustee with Responsibility For Safeguarding reviews the continued appropriateness of Thrive continuing to work with all members of the Thrive Workers who interact with children or young people at least once every six months. In addition Thrive's Safeguarding Lead should ensure that renewed Enhanced Disclosures with Barring list (DBS) are made in respect of all Thrive Workers at least once every three years. These reviews and any updated check should be noted in the **Safeguarding Register**. If any of Thrive Workers suspects that vetting has not been carried out or reviewed in relation to any person as required by this Safeguarding Policy, that team member should notify Thrive's Safeguarding Lead. The **Annual Safeguarding Self-Declaration** should be reviewed annually by each of the Thrive Workers and any changes communicated to Thrive's Safeguarding Lead who will update the **Safeguarding Register**.

20.2 **Reporting to trustees**: Thrive's CEO should ensure that Thrive's Safeguarding Lead reports to Thrive's Trustee who has responsibility for safeguarding regularly (at least once every six months). These reports should include:

20.2.1 consider whether this Safeguarding Policy should be reviewed (as required by Section 1.5); and

20.2.2 confirmation that the reviews required by Section 20.1 have been completed; and

20.2.3 a review of the matters noted in the **Safeguarding Register** and details of training that has been provided and recommendations as to what additional training should be provided (and to whom).

21 Confidentiality

21.1 **Extent of confidentiality**: Except as otherwise agreed in the **Application Form** and **Annual Safeguarding Self-Declaration,** information obtained about a Candidate learned as a result of the vetting process is confidential and should not be shared otherwise than on a legitimate "need to know basis":

21.1.1 in connection with the process of reviewing the Candidate's application for approval to deal with children or young people, or

21.1.2 to protect children or young people who may come into contact with, or otherwise be at risk of harm from, the Candidate, or

21.1.3 otherwise as reasonably beneficial to give effect to the principles promulgated in this Safeguarding Policy or any other policy adopted by Thrive.

21.2 **Required disclosure**: In some circumstances a police force or other Government or regulatory agency may require certain steps to be taken (which may include enforced confidentiality). Thrive expects to comply with such requirements. Thrive will also avoid disclosure of information (commonly referred to as "tipping off") if Thrive's Safeguarding Lead, Thrive's Executive or two or more of Thrive's Trustees consider that making such a disclosure may reduce the prospect of preventing further abuse or of apprehending a suspected perpetrator.

Schedule 1:
Identifying neglect, abuse and risk of harm

2

This Schedule is based on information provided by Thirtyone:eight.

1 **Abuse, neglect and risk of harm – all people**

1.1 This Section is designed to help Thrive Worker identify what constitutes abuse. This is no substitute for common sense, but may help Thrive Workers form a view. We also recommend consideration of the government's guidance "*Working Together to Safeguard Children (2018)*".[6]

1.2 **Abuse and neglect** - Abuse and neglect are forms of maltreatment of children and young people. Somebody may abuse or neglect a child or young person by inflicting harm, or by failing to act to prevent harm. Children or young people may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another child or young person.

1.3 **Physical abuse** - Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

1.4 **Emotional abuse** - Emotional abuse is the persistent emotional maltreatment of a child or young person such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child or young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child or young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

1.5 **Sexual abuse** - Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or young person s aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child or young person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

1.6 **Neglect** - Neglect 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. It may also include neglect of, or unresponsiveness to, a person's basic emotional needs. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child or young person is born, neglect may involve a parent or carer failing to:

1.6.1 provide adequate food, clothing and shelter (including exclusion from home or abandonment);

1.6.2 protect a child or young person from physical and emotional harm or danger;

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6 See - Working Together to Safeguard Children 2018 (publishing.service.gov.uk) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf

1.6.3 ensure adequate supervision (including the use of inadequate care-givers); or

1.6.4 ensure access to appropriate medical care or treatment.

1.7 **Spiritual abuse** - There is no formal, agreed definition of spiritual abuse and understanding of this area is still evolving. Thirtyone:eight describe the key characteristics of spiritual abuse as "*coercion and control, manipulation and pressuring of individuals, control through the misuse of religious texts and scripture and providing a 'divine' rationale for behaviour*".

1.8 **Peer-on-peer abuse and bullying** - Peer-on-peer abuse is any form of physical, sexual, emotional abuse, and coercive control between children. It is an issue of serious concern throughout England and is a significant risk facing children. Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. It can happen face to face or through cyberspace.

1.9 **Other abuse** – Section 2 describes other sorts of abuse to which children and young people who is an adult may be subjected. These examples may be just as applicable to any children and young people, including children.

2 Adults

2.1 **Adult at risk of harm** A person who is aged 18 or over and who has care and support needs as defined by the Care Act 2014. The safeguarding duties apply to an adult who;

2.1.1 has need for care and support (whether or not the local authority is meeting any of those needs) and;

2.1.2 is experiencing, or at risk of, abuse or neglect; and

2.1.3 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.

2.2 **Thrive's approach**: In common with all organisations Thrive aims to promote the wellbeing and safeguarding of adults at risk of harm (who are included within Thrive's definition of "*children and young people*"). People have complex lives and being safe is only one of the things they want for themselves. Thrive will work with professionals to assist children and young people who are adult establish what being safe means to them and how that can be best achieved. Professional and other staff should not be advocating 'safety' measures that do not take account of individual well-being, as defined in Section 1 of the Care Act[7] (this legislation considers the different types and patterns of abuse and neglect and the different circumstances in which they may take place. This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour which could give rise to a safeguarding concern).

2.3 **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

2.4 **Domestic violence** – including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.

2.5 **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting. Psychological abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

2.6 **Financial or material abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

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7 See http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted
https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance

2.7 **Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

2.8 **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

2.9 **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

2.10 **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

2.11 **Self-neglect** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. Incidents of abuse may be one-off or multiple, and affect one person or more. More advice is available at https://thirtyoneeight.org/help-and-resources/help-guides/how-can-i-support-someone-who-self-neglects/ (Thirtyone:eight's support page headed "*How can I support someone who self neglects?*").

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Schedule 2:
Safeguarding Documents

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Document title	Section number
Adult Attendance Register	5.1.7
Application Form	17.4 and 21.1
Children and Young Persons Attendance Register	5.1.6
Consent Form	5.1.4 and 5.9
Event Log	5.1.1, 5.9, 5.10, 8.3, 8.4 and 9.1
Partner Organisation Safeguarding Letter	3.2
Reference Request Form	17.5.2
Safeguarding Concern Notes	6.6 and 12.5
Safeguarding Poster	5.1.2
Safeguarding Register	13.1, 13.4, 13.5, 13.6, 13.8, 13.9, 17.7, 19.2, 20.1 and 20.2.3
Annual Safeguarding Self-Declaration	20.1 and 21.1
Thrive's Behaviour Code	5.1.3, 5.1.5, 5.2, 5.7 and 9.1
Thrive's Data Protection Policy and Privacy Notice	7.4, 13.9 and 17.7
Transport Consent Form	5.9
Visitor Details Form	5.1.8
Thrive's Whistleblowing and Concerns Policy	19.4
Workers' Pocket Guide	5.1.3