

Safeguarding Policy



Contents

1. **Aim of this Policy**
2. **Definitions**
 - a) Definition of children
 - b) Definition of vulnerable adults
 - c) Definition of abuse
3. **Rights & Responsibilities**
 - a) Responsibilities of Karma Nirvana
 - b) Responsibilities of Employees & Volunteers
 - c) Support for those who report abuse
 - d) Rights of children and vulnerable adults
4. **Good Practice**
 - a) Recruitment
 - b) Management and Supervision
 - c) Training
 - d) Record Keeping
 - e) Planning
 - f) Abuse Perpetrated by Employees or Volunteers
5. **Identification of Abuse**
6. **Responding to an Allegation or Concern**
7. **Designated Safeguarding Officer**
8. **Whistleblowing**
9. **Information Sharing**
10. **Procedures**
11. **Legislation and Legal Framework**
12. **Glossary**

1. Aim of the Policy

The purpose of this policy is to protect people, particularly children, at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with Karma Nirvana. This includes harm arising from:

- The conduct of staff or personnel associated with Karma Nirvana
- The design and implementation of Karma Nirvana's activities

The policy lays out the commitments made by Karma Nirvana, and informs staff and associated personnel¹ of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under Karma Nirvana's Personal Harassment Policy and Procedure.
- Safeguarding concerns in the wider community not perpetrated by Karma Nirvana or associated personnel.

This Safeguarding Policy will be made available to all staff as part of the induction process. A copy will also be available to view in the relevant shared drive.

2. Definitions

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. Safeguarding is an umbrella term that includes child and adult protection.

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or activities. Karma Nirvana are committed to the safety and wellbeing of all of those who access our services as well as the staff, volunteers and trustees.

a) **Definition of children:** For the purposes of this policy, a child refers to any individual under the age of 18. HM Government's *'Working Together to Safeguard Children'* (2018) defines safeguarding as:

- providing help and support to meet the needs of children as soon as problems emerge

- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

b) **Definition of vulnerable adults:** The Care Act (2014) defines an adult at risk as 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support'.

Adult safeguarding is aimed at people with care and support needs who may be in vulnerable circumstances and at risk of abuse or neglect. In these cases, local services must work together to spot those at risk and take steps to protect them.

c) **Definition of abuse:** somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. Abuse encompasses physical, emotional, sexual, financial, or psychological abuse, as well as neglect or exploitation. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Neglect

Neglect is the persistent failure to meet a child or adult's basic needs both physical and or emotional/psychological. It may involve failure to provide clothes, shelter and food or failure to keep them clean or protect them from physical harm or danger. It may also include neglect of, or unresponsiveness to, the person's basic emotional needs and their developmental needs.

Disclosures of neglect should be discussed with Senior Leadership Team at the earliest opportunity and no later than 24 hours after the disclosure has been made. Call Handlers should log the call as normal. If Call Handlers believe someone's life is in danger, they should consider calling the emergency services with guidance from SLT.

Physical abuse

Physical abuse is causing **physical harm** to a child or adult such as hitting, shaking, pushing, beating, pinching, burning, restraining unnecessarily or other form of physical

harm. Harm can also be caused when a parent or carer fabricates symptoms of ill health or causes actual ill health in a child or young person in their care.

Please note that parents or others in “loco parentis” in the UK are currently allowed to use “reasonable chastisement” (mild forms of physical punishment) when disciplining their children (unless, as is the case of schools, for example, they are forbidden to do so by virtue of other regulations). However, the Crown Prosecution Service charging standard, means that hitting a child hard enough to leave a visible bruising, grazes, scratches, minor swelling or cuts, now constitutes the criminal offence of actual bodily harm. This carries a maximum sentence of 5 years in prison. The first task should be to ask the young person or adults at risk to describe the incident and any resultant injuries.

If you are worried that the young person’s or adult at risk’s life is at immediate risk then you will need to speak to the Designated Safeguarding Lead who will make a decision with respect to calling the emergency services (see Confidentiality and Information Sharing Policy). If not, then you should make sure the person is aware of services that may be able to help them and ensure you log the call/session as usual.

Sexual abuse

Sexual abuse is forcing a child or adult to engage in sexual activities. May include rape, sexual assault, and may also include non-contact abuse, such as involving the person in creating or looking at pornographic material. Includes activities such as sending inappropriate messages and online or face to face grooming.

Sexual abuse usually comes to light in a different way from physical abuse or neglect. The most usual route is that the child or young person confides in someone; this is usually referred to as ‘disclosure’. The same disclosure would be treated for adults at risk of sexual abuse.

The staff member’s role is not to discuss the detail of the case with victim or with a parent/carer or adult at risk but to listen, reassure and support the victim in taking action. If you are concerned that the person is being sexually abused then you must discuss this with SLT who will then take appropriate action which could include taking advice from social services or contacting the police if it is felt there is an immediate danger to a child or young person. Log the call/session as usual.

Emotional or psychological abuse

Children –(emotional) persistently emotionally or psychologically ill-treating a child to the point where it causes severe and long-lasting adverse effects in their emotional development. May involve making a child feel they are worthless, unloved or unvalued,

insulting the child ignoring them, making them feel guilty. May involve making unacceptable demands on the child in relation to their age and capabilities, or causing children frequently to feel frightened or in danger.

Adult – (psychological) emotional and psychological abuse involves a pattern where a person consistently rejects, belittles, controls, frightens or deceives another, often within a 'caring' or 'loving' relationship. There can be extra difficulty in identifying an emotionally abusive relationship because emotional or psychological abusers may be unaware of what they are doing. They may believe they do and say the abusive things they do for the benefit of their victim.

If you feel the person's life is in danger, then talk to SLT and you may wish to consider contacting the police. If not, then ensure the person is aware of agencies that may be able to provide advice or support. Log the call/session as usual.

Discriminatory abuse

Discriminatory abuse may manifest itself as any of the other categories of abuse previously stated. What is distinctive, however, is that discriminatory abuse is motivated by oppressive and discriminatory attitudes towards a person's disability, physical or learning disability, mental ill-health or sensory impairment, race, gender, age, religion, cultural background, sexual orientation, political convictions, appearance or other aspects.

If you feel the person's life is in danger, then talk to SLT and you may wish to consider contacting the police. If not, then ensure the person is aware of agencies that may be able to provide advice or support. Log the call/session as usual.

Significant harm

The Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Physical Abuse, Sexual Abuse, Emotional Abuse and Neglect are all categories of Significant Harm.

3. Rights & Responsibilities

Child safeguarding

Karma Nirvana staff and associated personnel must not:

- Abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking
- Engage in sexual activity with anyone under the age of 18

Adult safeguarding

Karma Nirvana staff and associated personnel must not:

- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect

Protection from sexual harassment and abuse

Karma Nirvana staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

a) Responsibilities of Karma Nirvana: We are committed to creating a safe environment for children and vulnerable adults accessing our services. We will ensure the implementation of robust safeguarding procedures, provide appropriate training and support to staff and volunteers, and actively promote awareness of safeguarding issues.

b) Responsibilities of Employees & Volunteers: All employees and volunteers have a duty to safeguard children and vulnerable adults and must be vigilant in identifying signs of abuse or neglect. They are obligated to report any concerns promptly to the designated safeguarding officer and adhere to Karma Nirvana's safeguarding policies and procedures. Associated personnel whilst engaged with work or visits related to Karma Nirvana, including but not limited to the following: consultants; volunteers; trustees and patrons.

c) Support for those who report abuse: Karma Nirvana will offer comprehensive support and guidance to individuals who report abuse, ensuring confidentiality, sensitivity, and protection from victimization or retaliation.

d) Rights of children and vulnerable adults: Children and vulnerable adults accessing Karma Nirvana's services have the right to be treated with dignity, respect, and autonomy. They have the right to make their own choices and decisions, free from coercion or undue influence, and to receive support and protection from abuse or exploitation.

Karma Nirvana expects all its staff to read a copy of the Safeguarding policy, which covers contact with children, young people and vulnerable adults through various activities, notably the helpline and advocacy (face to face) service. Safeguarding is an umbrella term that includes child and adult protection.

4. Good Practice

a) Recruitment: Karma Nirvana operates a robust, consistent and fair recruitment process. If a job offer is made and accepted, then references will be checked and at point of successful appointment a DBS checks will be carried out and photo ID is taken in the form of a passport or driving licence on induction. If the post requires then staff will undergo an enhanced DBS check.

It is our policy that no-one shall work within Karma Nirvana who:

- Has been convicted of or has received a formal police caution concerning an offence against children; or
- Has been convicted of or has received a formal police caution concerning sexual offences against adults; or
- Is notified to us as having a red flag in relation to safeguarding by a former employer.

If Karma Nirvana are recruiting from abroad some additional checks may need to be undertaken before employment is confirmed.

All staff and volunteers to have a duty to declare any existing or subsequent convictions. Failure to do so will be regarded as gross misconduct, possibly resulting in dismissal.

b) Management and Supervision: Effective management and supervision practices will be maintained to ensure staff and volunteers are adequately supported, trained, and monitored in their safeguarding responsibilities.

c) Training: Regular safeguarding training will be provided to all staff and volunteers, equipping them with the knowledge and skills necessary to recognise, respond to, and prevent abuse.

Awareness of this safeguarding policy/procedure is covered within the induction programme of all new employees and their understanding checked within supervision meetings. All staff will receive training on safeguarding at a level adequate with their roles. Further training will be required for those supporting victims and survivors directly covering risk assessment & management, types of abuse, recognising signs of abuse, confidentiality and safeguarding adults and children.

d) Record Keeping: Accurate and detailed records of safeguarding concerns, incidents, and actions taken will be recorded on the relevant management systems in accordance with data protection laws and Karma Nirvana's procedures.

e) Planning: Safeguarding considerations will be integrated into all aspects of Karma Nirvana's planning and service delivery, including risk assessments, policies, and procedures.

f) Abuse Perpetrated by Employees or Volunteers: Allegations or concerns regarding abuse perpetrated by employees or volunteers will be taken seriously and investigated promptly and impartially, in line with Karma Nirvana's disciplinary procedures and legal obligations.

5. Identification of Abuse

Karma Nirvana staff and volunteers will be trained to recognise the signs and indicators of abuse, including physical injuries, changes in behaviour, financial exploitation, and coercive control, and to respond appropriately.

Signs and symptoms of abuse

When an individual is experiencing abuse, they may display signs or symptoms. These can include (but are not limited to):

- Becoming withdrawn
- Withdrawing from friends and family
- Losing interest in hobbies, job etc
- Evident bruising, scratches, cuts or other marks and injuries
- Low self-esteem/confidence
- Depression
- Anxiety
- Self-harm
- Suicidal thoughts
- Suicide attempts
- Other mental health issues
- Slower than normal development
- Unusual interaction with parent
- Unusual or erratic behaviour
- Running away from home
- Rapid weight loss or gain
- Repeated illnesses
- Bed wetting
- Bed sores
- Sudden changes in behaviour – becoming too withdrawn or erratic
- Decline in educational work and grades
- Alcohol misuse
- Drug misuse

It is important to remember that the above list is not exhaustive. It is also important to remember that individually these signs may not present a concern but persistence and a combination of a number of the above can offer further indication that abuse may be taking place.

Call Handlers on the helpline must remember that not all of the above signs will be evident to them as the Helpline is not a face-to-face service. It is also important to remember that Service Users retain the right to share as much or as little information as they wish, so they may choose not to share information which alludes to abuse taking place. Our role is to support the individual and not to intelligence gather.

6. Responding to an Allegation or Concern

Karma Nirvana has clear procedures in place for responding to safeguarding concerns or allegations of abuse, including reporting mechanisms, risk assessment, investigation processes, and support for all parties involved.

If you are concerned about the safety of a child or vulnerable adult i.e. you see/hear or suspect abuse, an allegation of abuse is made or a report is made, discuss your concerns with the DSL.

If any member of trustee/staff/volunteer/associated personnel has reason to believe that abuse is or may be taking place you have a responsibility to act on this information. It does not matter what your role is, doing nothing is not an option.

No abuse is acceptable, and some abuse is a criminal offence and must be reported to the police as soon as possible. It is not the job of a Karma Nirvana staff member or volunteer to investigate any concerns they may have regarding abuse of a vulnerable adult. If they have such concerns, they must first discuss these with their Line Manager/Designated Safeguarding Lead who will then seek advice from Social Services and/or the Police.

How to report a safeguarding concern?

Staff members who have a complaint or concern relating to safeguarding should report it immediately to the designated Safeguarding lead (DSL) or line manager. If the staff member does not feel comfortable reporting to their Safeguarding lead or

line manager, they may report to any other appropriate Senior Management staff member or to the trustee contact.

Safeguarding and Suicidal Service Users

Service Users displaying suicidal ideation may contact the Helpline or the organisation. These individuals may be in a state of distress and/or crisis. They may be facing additional mental health issues and external factors, which may be contributing towards their current state of mind.

On the helpline call handlers must establish whether such callers are talking about their thoughts and feelings, or whether they have an active plan to complete suicide. At this stage, the Call Handler must inform the Service User of the Safeguarding Policy and explain that Karma Nirvana may need to take action if they believe the individual is at immediate risk.

If they are only speaking about their thoughts and feelings, but are not at immediate risk, then it is important we give them the space and time to explore these feelings and provide them with emotional support. We should also provide them with the number for Samaritans and explain to them that they should call 999 in an emergency situation.

If the caller discloses that they have a plan and we have information to believe they are at immediate risk of carrying this out, or if they are carrying this out whilst they are on the call, then we must immediately inform the DSL in charge at the time. The DSL will then make the decision around safeguarding. The Call Handler will inform the service user at this stage that we will be safeguarding and calling the emergency services. Where possible we must remain on the phone to the caller, or remain with the service user if in a face to face capacity.

In the event that a Call Handler has reason to believe that a Service User is deliberately withholding information relating to suicidal plans and/or self-harm, perhaps in an attempt to circumvent Karma Nirvana's safeguarding protocol, the Call Handler should use their professional judgement and take the necessary actions to safeguard the individual. This may involve sharing information with other relevant authorities.

Further guidance notes within the Support Services Policy for the procedure to follow when a caller discloses a suicide plan.

7. Designated Safeguarding Officer

Karma Nirvana has designated a trained safeguarding officer who is responsible for overseeing the implementation of this policy, providing advice and support, and liaising with relevant authorities and agencies as required.

Staff – Designated Safeguarding Lead

Anup Manota - a.manota@karmanirvana.org.uk / 01138870281/ 08005999247

CEO: Natasha Rattu

Trustee

Nasreen Quayum

8. Whistleblowing

We encourage a culture of openness and transparency, where staff and volunteers feel empowered to raise concerns or report wrongdoing without fear of reprisal. Whistleblowing procedures will be followed to ensure concerns are addressed effectively.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Karma Nirvana's Whistleblowing Policy.

Karma Nirvana will also accept complaints from external sources such as members of the public, partners and official bodies.

The need to report arises in the following instances:

- Abuse is observed or suspected
- An allegation of abuse is made
- Someone discloses abuse

9. Information Sharing

The Helpline offers Service Users the opportunity to discuss issues in a non-judgemental and confidential setting. However, there are times when Helpline staff may have to break confidentiality with or without consent for the purposes of safeguarding an individual. These are outlined in detail in the Confidentiality and Information Sharing Policy.

Information sharing is essential for effective safeguarding and promoting the welfare of children, young people and adults at risk. The General Data Protection Regulations and Data Protection Act 2018 place a greater duty on organisations to be open and honest in relation to the use of people's data; however, the acts "do not prevent, or limit, the sharing of information to keep children and young people safe".

Where possible, staff should gain consent from children and families before sharing and storing information; however, you may continue to share information without consent if you believe an individual's safety is at risk. Sharing information with professionals who need to know ensures that problems are identified early and action is taken when children are thought to be at risk of abuse.

10. Procedures

Detailed procedures for safeguarding children and vulnerable adults, responding to safeguarding concerns, whistleblowing, and other relevant processes will be outlined in separate documents, which will be readily available to staff, volunteers, and stakeholders.

- Our role is not to intelligence gather if a disclosure of abuse is made, but we will need to gather certain amounts of information. The information that we gather should only be identifiable information that is appropriate to that situation. We must offer reassurance, support and guidance to the individual. If you are concerned that a disclosure of abuse has been made that may warrant a safeguarding referral, then you must speak with the DSL or a member of SLT.
- If a staff member feels they have been given information that falls into a category as listed in the safeguarding policy they will firstly consult with the DSL or SLT.
- They will use all available information to make an assessment about the extent to which the disclosed information meets the outlined clauses. If the Helpline call handler and DSL need further input, another member of SLT may be contacted and consulted.
- If the decision is made to call the emergency services then all available information will be passed to them along with the name and number of the staff member for further consultation.
- A written record of the incident which led to a breach in confidentiality and subsequent discussions and decisions will then be made and logged on to management system. Any incident that involved the breaking of confidentiality will

be reviewed by a member of SLT or DSL not involved in the initial process to ensure correct procedures have been adhered to.

- If a decision is made to disclose confidential information to another professional, the staff member should always seek the consent of the person before the disclosure. A careful explanation of why the disclosure is to be made and assurance of the service user's safety, including what will happen following the disclosure, may assist the service user. If consent is not given but the decision is made to disclose the information, know that the law protects us in breaking confidentiality.
- In the instance that you need to make a call to children's or adult social services out of hours you should use the out of hours' emergency contact details for that local authority, which can usually be found on the local authority website. Out of hours' referrals will usually be dealt with by the emergency duty team.

When considering the decision as to whether to refer elsewhere (e.g. to Police, Social Services) the following should be taken into account:

- The wishes of the individual
- Known indicators of abuse
- Level of risk to this individual
- The seriousness of the abuse
- The effect of the abuse on the individual
- Level of risk to others
- Whether a criminal offence has been committed
- Whether other statutory obligations have been breached
- The ability of others (e.g. Police, Social Services) to make a positive contribution to the situation

Issues of Mental Capacity and Consent

The consent of the vulnerable adult must be obtained except where

- The vulnerable adult lacks the mental capacity to make a decision, and a risk assessment indicates that referral would be in their best interests
- Others may be at risk
- A crime has been committed

11. Legislation and Legal Framework

This policy is in line with:

- The Children Act 1989,
- The Children Act 2004,
- The Children and Social Work Act 2017
- The Care Act of 2014
- The Safeguarding Disabled Children Act of 2009
- Working Together to Safeguard Children 2023
- Modern Slavery Act 2015
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- Serious Crime Act 2015

Associated Karma Nirvana policies:

Support Services Policy

Complaints Policy

Confidentiality Policy

Whistleblower policy

This policy was approved by Karma Nirvana's management team including trustees in April 2023.

Signed by CEO: Natasha Rattu



Dated: 24/04/2023

12. Glossary

Child protection

Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Children

Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.

Domestic abuse

The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse (section 1 of the Act). The statutory definition is clear that domestic abuse may be a single incident or a course of conduct which can encompass a wide range of abusive behaviours, including a) physical or sexual abuse; b) violent or threatening behaviour; c) controlling or coercive behaviour; d) economic abuse; and e) psychological, emotional, or other abuse.

Emotional abuse

The persistent emotional maltreatment of a child and vulnerable adult so as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to an individual that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

Harm

Psychological, physical and any other infringement of an individual's rights

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Physical Abuse

Causing physical harm to a child or adult such as: Hitting, shaking, pushing, beating, pinching, burning, restraining unnecessarily or other form of physical harm. Harm can also be caused when a parent or carer fabricates symptoms of ill health or causes actual ill health in a child or young person in their care.

Safeguarding

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or activities.

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our activities, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centered and also protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

At risk adult

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be

unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

