



Safeguarding Policy

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1. Introduction

At Zest of Mind, safeguarding is everyone's responsibility. We are committed to creating a safe and secure environment for all children, young people, and vulnerable adults who engage with our services. All children, young people and vulnerable adults have the right to protection from abuse regardless of their ethnicity, immigration status, religion or belief, sex, gender identity, sexual orientation, or disability. Safeguarding is embedded throughout our organisation to ensure individuals are protected from harm, abuse, and exploitation.

This policy provides a framework to guide all staff, volunteers, trustees and anyone representing our organisation in safeguarding practices and defines clear procedures for addressing concerns. Our approach is underpinned by the principle of "it could happen here" and a culture of vigilance.

2. Purpose and Scope

This policy applies to:

- All staff (paid and unpaid), volunteers, trustees, and contractors working on behalf of Zest of Mind.
- All activities undertaken by Zest of Mind, including those involving external partners.

Objectives

1. Provide a safe environment for children, young people, and vulnerable adults to thrive.
 2. Identify and respond promptly to safeguarding concerns.
 3. Ensure staff are equipped to recognise risks and act appropriately.
 4. Promote a culture where safeguarding is prioritised, and individuals feel safe and supported.
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3. Relevant Legislation

This policy is informed by the following:

- [Children Act 1989](#) and [Children Act 2004](#)
- [Working Together to Safeguard Children 2023](#)
- [The Care Act 2014](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Safeguarding Disabled Children 2009](#)
- [Prevent Duty Guidance 2015](#) and [Prevent Duty Guidance 2023](#)

- [Data Protection Act 2018](#) and [UK General Data Protection Regulation](#)
 - [The Public Interest Disclosure Act 1998](#)
 - [The Police Act 1997](#) and [Protection of Freedoms Act 2012](#)
 - [Rehabilitation of Offenders Act 1974](#)
 - [NHS and Community Care Act 1990](#)
 - [Mental Health Act 1983](#)
 - [The Adoption and Children Act 2002](#)
 - [Equality Act 2010](#)
 - [Human Rights Act 1998](#)
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4. Definitions

Safeguarding

Safeguarding is:

- Providing help and support to meet the needs of children, young people and vulnerable adults as soon as problems emerge
- Protecting children, young people and vulnerable adults from maltreatment, whether that is within or outside the home (including online)
- Preventing the impairment of children, young people and vulnerable adults mental and physical health or development
- Ensuring that children, young people and vulnerable adults grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children, young people and vulnerable adults to have the best outcomes.

Abuse

Abuse is the misuse of power or authority that harms another person. Abuse can occur across any gender, age, culture, or socio-economic group. It can occur in any setting and includes harm caused deliberately or through negligence. (*see also Appendix 1*)

Child

Anyone under the age of 18.

Vulnerable Adult

A person aged 18+ who may be unable to protect themselves from harm due to factors such as disability, illness, or vulnerability (e.g., frailty, mental illness, substance misuse, homelessness).

Types of Abuse and Indicators Below are definitions, examples and indicators of key abuse types

Physical Abuse

- **Definition:** Deliberate physical harm or injury.
- **Examples:** Hitting, shaking, burning, restraint, fabricated illness.
- **Indicators:** Bruises, burns, fractures, fear of physical contact, withdrawn behaviour.

Emotional Abuse

- **Definition:** Persistent emotional maltreatment causing severe adverse effects on emotional development.
- **Examples:** Rejection, verbal abuse, witnessing domestic violence, bullying.
- **Indicators:** Anxiety, low self-esteem, depression, developmental delays, self-harm.

Sexual Abuse

- **Definition:** Forcing or enticing someone to take part in sexual activities.
- **Examples:** Sexual assault, inappropriate touching, grooming, online exploitation, exposure to pornography.
- **Indicators:** Knowledge of sexual acts inappropriate for age, nightmares, withdrawal, physical discomfort and/or pain in genital areas.

Neglect

- **Definition:** Persistent failure to meet basic physical or psychological needs.
- **Examples:** Lack of food, clothing, shelter, or supervision.
- **Indicators:** Malnutrition, poor appearance and/or hygiene, untreated medical issues, frequent absences.

Financial or Material Abuse

- **Definition:** Exploitation involving theft or misuse of financial resources property (particularly relevant for vulnerable adults)
- **Examples:** Theft, coercion in financial decisions, fraud, exploitation.
- **Indicators:** Sudden loss of money, unpaid bills, reluctance to discuss finances.

Bullying (Including Online Abuse aka Cyberbullying)

- **Definition:** Deliberate acts of intimidation, humiliation, or harm inflicted by people in person or online, including emotional, physical, or sexual abuse
- **Examples:** Name-calling, threats, physical violence, cyberbullying, harassment, sharing indecent or abusive images, grooming, exposure to harmful content.
- **Indicators:** Unexplained injuries, anxiety or fear of certain peers, loss of belongings, withdrawal, sudden behaviour changes, distress after being online, secretive use of devices.

Contextual Safeguarding: Recognises that **external factors** (e.g., peers, neighbourhoods, online) impact safety (*see also Appendix 2*).

Child Sexual Exploitation (CSE)

- **Definition:** Exploiting a child through coercion or manipulation into sexual activity, often for something in return.
- **Examples:** Grooming, sexual acts for gifts or money, online exploitation, sextortion.
- **Indicators:** Unexplained gifts, older relationships, secrecy, going missing, inappropriate sexual behaviour.

Child Criminal Exploitation (CCE)

- **Definition:** Forcing or tricking a child into criminal activity for someone else's benefit.
- **Examples:** Drug dealing, theft, carrying weapons, gang involvement.

- **Indicators:** Money or items with no explanation, missing episodes, fearfulness, association with older peers.

County Lines (form of CCE)

- **Definition:** Gangs exploiting children to move, store or sell drugs using mobile 'deal lines'.
- **Examples:** Drug running, transporting money or weapons across areas.
- **Indicators:** Travel to unfamiliar places, multiple phones, staying in hotels, signs of intimidation or control.

Peer-on-Peer Abuse

- **Definition:** Abuse where a child, young person, or vulnerable adult is harmed by another in their peer group, either in person or online.
- **Examples:** Bullying (including online or discriminatory), physical violence, sexual harassment or violence, coercion into sharing sexual images.
- **Indicators:** Unexplained injuries, anxiety around peers, withdrawal, aggression, reluctance to attend sessions, or inappropriate language or behaviour.

Other Key Safeguarding Issues

Radicalisation and Extremism (Prevent Duty)

- **Definition:** The process by which someone comes to support extremist views or terrorist acts. Vocal or active opposition to fundamental British values like democracy and tolerance.
- **Examples:** Supporting terrorist groups, promoting extremist views online or in person. Hate speech, promoting intolerance, encouraging violence, anti-armed forces rhetoric.
- **Indicators:** Sudden changes in behaviour or beliefs, isolation, use of extremist language, obsession with ideology. Intolerant views, justifying violence, rejecting the rule of law or other beliefs.

Female Genital Mutilation (FGM)

- The illegal practice of altering or injuring female genital organs. FGM is illegal and constitutes physical abuse. Staff must report concerns to the authorities.

Mental Health

- Mental health issues in children, young people, and vulnerable adults may be a sign that they have experienced or are at risk of abuse, neglect, or exploitation. While only trained professionals can diagnose mental health conditions, staff should be alert to behaviours that suggest someone may be struggling—such as withdrawal, low mood, anxiety, aggression, or sudden changes in behaviour. Past trauma, including abuse or neglect, can have a long-term impact on emotional wellbeing and should be considered when offering support.

5. Reporting Procedures

To ensure that safeguarding concerns are reported promptly and appropriately, Zest of Mind has developed a clear Reporting Process. All staff and volunteers are expected to follow these steps when they encounter safeguarding concerns.

Step-by-Step Reporting Process:

1. **Recognise:** Staff should remain vigilant and adopt a “**it could happen here**” mindset. Any staff member who identifies a safeguarding concern regarding a child, young person or vulnerable adult must report it immediately. This could include signs of abuse, neglect or changes in behaviour, direct disclosures made by the individual or information shared by a third party
2. **Respond:**
 - a. Reassure the individual that they are right to share their concerns.
 - b. Avoid asking leading questions.
 - c. Do not promise confidentiality.
3. **Report:**
 - a. Contact the **Designated Safeguarding Lead** to report concern
 - b. **Is the DSL available?**
 - i. If **Yes**, the DSL will review the concern and take appropriate action.
 - ii. If **No**, the concern should be escalated to the **Deputy DSO**
 - iii. For concerns about the DSL report to the **Safeguarding Trustee Lead**
 - c. **Immediate Danger to the Individual?**
 - i. If there is **immediate risk of harm** to the individual, **contact emergency services** (999) immediately.
 - ii. Contact **MASH (Multi-Agency Safeguarding Hub) team** or the **Emergency duty team** (if outside office hours) for the Borough
 - iii. After addressing the immediate danger, the concern must still be formally reported and logged using the **Safeguarding Incident Report form** (see also Appendix 3)
4. **Record:**
 - a. Complete a detailed account using the **Safeguarding Incident Report Form**.
 - b. Listen carefully and take the individual seriously.
 - c. Note exact words and emotional states, distinguishing fact from opinion.
5. **Refer:** The following actions may be taken following investigation
 - a. Where applicable, escalate to the Local Authority Safeguarding Team within **24 hours** of receiving the concern
 - b. Where applicable make a MASH referral
 - c. If the concern is related to Radicalisation and Extremism make a Prevent referral
 - d. If allegations are made against staff, volunteers and contractors working on behalf of Zest of Mind escalate the concern to the appropriate LADO and follow Local Authority procedures

6. Follow-Up:

- a. Document all actions taken and responses received
 - b. Follow through with necessary referrals and support plans
 - c. Ensure applicable feedback is received from the Local Authority.
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6. Confidentiality and Information Sharing

All safeguarding information is confidential but may be shared if necessary to protect individuals. Safeguarding concerns override the duty of confidentiality.

Informing Service Users About Confidentiality

All children, young people, and vulnerable adults will be informed about confidentiality and its limits at the beginning of their engagement with our services. This includes:

- Providing clear, age-appropriate information about when information will be kept confidential
- Explaining circumstances where confidentiality may need to be broken
- Outlining the procedures we follow when sharing information
- Ensuring they understand their rights regarding confidentiality

Service users will receive our **Your Privacy Matters poster** (see Appendix 4), which explains our approach in accessible language.

Circumstances Where Confidentiality May Be Broken

Zest of Mind respects confidentiality, but it **may be broken** when:

- a. A person is at risk of serious harm or in immediate danger
- b. There is a legal requirement to disclose information
- c. Sharing is necessary to safeguard others
- d. The person requires additional support that we cannot provide alone

Information Sharing Procedures

When confidentiality needs to be broken, staff must follow these procedures:

1. Assessment and Decision-Making

- The DSL (or Deputy DSO) will assess the situation and make decisions about information sharing
- The decision will be based on the level of risk and the person's best interests

2. Involving the Individual

- Where possible and safe to do so, individuals will be informed before information is shared
- They will be involved in decisions about what information is shared and with whom
- Support will be provided throughout the process

3. Information Sharing Principles

- Information will only be shared on a '**need-to-know**' basis
- Only the minimum information necessary will be shared
- Information will be shared with appropriate external agencies when required to safeguard an individual
- Parents or carers will be informed unless this increases risk to the individual

4. Documentation

- All decisions about information sharing will be documented
- Records of what information was shared, with whom, and why will be maintained
- Records are stored securely in line with the Data Protection Act 2018

Staff Responsibilities

Staff must:

- Inform service users about confidentiality limits during initial contact
- Avoid promising absolute confidentiality to service users, their parents/carers or colleagues
- Report safeguarding concerns to the DSL immediately
- Follow data protection guidelines when handling sensitive information
- Support individuals throughout any information sharing process
- Document all safeguarding concerns and actions taken

Ongoing Communication

Staff will ensure that individuals continue to receive appropriate information and support throughout any safeguarding process, including:

- Explanations about what has been shared and why
- Ongoing emotional support
- Updates about any actions being taken

This approach ensures transparency while prioritising the safety and wellbeing of all individuals in our care.

7. Roles and Responsibilities

All Staff and Volunteers

All staff and volunteers are responsible for:

- Acting in the best interests of individuals.
- Being vigilant and reporting any safeguarding concern promptly to the DSL and/or appropriate staff/authorities
- Promoting safe practices
- Maintaining professional boundaries and adhering to the code of conduct

Trustees

Trustees have oversight responsibility for Safeguarding and must:

- Ensure Zest of Mind Ltd has effective Safeguarding policies.
- Review Safeguarding policies annually.
- Ensure safer recruitment practices are implemented.
- Monitor safeguarding compliance and address identified deficiencies
- Undertake Safeguarding training

Designated Safeguarding Personnel

Designated Safeguarding Lead (DSL):

Alastair Coward

- Call: 07956 478 393
- Email: alastair@zestofmind.com
- The Designated Safeguarding Lead is responsible for:
Overseeing safeguarding implementation.
Leading safeguarding investigations.
Liaising with external agencies such as social services and the police.
Ensuring staff receive regular safeguarding training.

Deputy Designated Safeguarding Officer (Deputy DSO):

Dilusha Dimunge

- Call: 07391 612 537
- Email: safeguarding@zestofmind.com
- The Deputy Designated Safeguarding Officer is responsible for the above in the absence of the DSL

Safeguarding Trustee:

Dilusha Dimunge

- Call: 07391 612 537
- Email: admin@zestofmind.com
- Responsibilities include overseeing safeguarding strategy, compliance, and supporting the DSL.

Local Safeguarding Partnership Details

Brent Local Authority Designated Officer (LADO):

- Brent Family Front Door
- Office hours Monday – Friday 9am - 5pm: Call 020 8937 4300
Outside office hours: Call emergency duty team 020 8863 5250
- Email: familyfrontdoor@brent.gov.uk

Brent Local Safeguarding Partnership:

- Brent Safeguarding Children Partnership (BSCP)
- Call: 020 8937 4300
- Email: Brent.Safeguardingpartnerships@brent.gov.uk
- Brent Safeguarding Adults Board (BSAB)
- Call: 020 8937 4098 or 020 8937 4099
- Email: Brent.Safeguardingpartnerships@brent.gov.uk

Harrow Local Authority Designated Officer (LADO):

- Rosalind South
- Office hours Monday – Friday 9am – 5pm: Call 020 8901 2690
Outside office hours: Call 020 8424 0999
- Email: lado@harrow.gov.uk

Harrow Local Safeguarding Partnership:

- Harrow Safeguarding Children Board (HSCB)
- Call: 020 8901 2690
- Email: duty.assess@harrow.gov.uk
- Harrow Safeguarding Adults Board (HSAB)
- Call: 020 8901 2680
- Email: AHadults@harrow.gov.uk

(See Appendix 5)

8. Training and Development

All staff, volunteers, and trustees must complete safeguarding training:

- **Induction Training:** Upon joining Zest of Mind.
- **Refresher Training:** Annually
- **Specialist Training:** Designated Safeguarding Leads, Officers and Trustees must attend advanced safeguarding training every two years

Records of training will be maintained and reviewed regularly.

9. Professional Boundaries

All staff and volunteers must adhere to our **Code of Conduct** and retain appropriate relationships with service users:

- Act professionally and maintain professional boundaries.
- Act responsibly
- Avoid behaviours that could be misinterpreted.
- Avoid relationships with past or current service users.
- Do not exchange personal contact details including but not limited to personal social media handles.

*(See **Code of Conduct** for further details)*

10. Safer Recruitment

Zest of Mind follows safer recruitment practices to ensure the suitability of staff and volunteers, including:

- Enhanced DBS checks for all relevant roles
- Vetting, interviews, and references before employment begins
- Inclusion of safeguarding responsibilities in role descriptions.
- Mandatory safeguarding training for new recruits.
- Ongoing supervision and training.
- Evaluating safeguarding arrangements with partner organisations including confirmation appropriate vetting and checks have been performed on their staff

At least one panel member during recruitment will have undertaken Safer Recruitment training.

(See **Safer Recruitment Policy** for further details.)

11. Whistleblowing

Staff and volunteers must report any concerns about the behaviour of colleagues that may compromise the safety of children, young people, or vulnerable adults. Zest of Mind's whistleblowing procedures ensure all reports are treated confidentially and acted upon appropriately.

This procedure should be used in any case in which it is alleged that a member of staff, visiting professional, third-party staff or volunteer has:

- Behaved in a way that has harmed or may have harmed a child/young person/vulnerable adult
- Possibly committed a criminal offence against or related to a child/young person/vulnerable adult
- Behaved or may have behaved in a way that indicates s/he is unsuitable to work with children, young people or vulnerable adults

The process for raising and dealing with allegations is as follows:

1. Any member of staff (paid or unpaid) is required to report any concerns in the first instance to the **Designated Safeguarding Lead**. A written record of the concern will be completed
2. **Is the DSL available?**
 - i. If **Yes**, the DSL will review the concern and take appropriate action.
 - ii. If **No**, the concern should be escalated to the **Deputy DSO**
 - iii. For concerns about the DSL report to the **Safeguarding Trustee Lead**
3. Contact the **Local Authority Safeguarding Partnerships** for advice. This can be done for example via the Local Authority Designated Officer (LADO) when the concern relates to children
4. Follow the Local Authority advice provided

If staff have a safeguarding concern or an allegation about another member of staff that does not meet the harm threshold, then this should be treated as a low-level concern. Low-level concerns may arise in several ways for example: suspicion; complaint; or disclosure

made by a child, young person, vulnerable adult, parent or other adult within or outside of our setting; or as a result of vetting checks undertaken.

Learning lessons applies to all cases not just those which are concluded and found to be true. The Designated Safeguarding Lead will ensure evaluation and recommendations are completed in every case of allegation against staff.

(See **Whistleblowing Policy** for further details.)

12. General Consent

All staff must ensure that **informed consent** is obtained from individuals or, where applicable, their legal guardians before sharing personal information. This includes any details that could identify a person, such as names, contact details, or other sensitive data.

Consent should be:

- **Voluntary** – given freely without pressure.
- **Informed** – individuals must understand what they are consenting to and how their information will be used.
- **Specific** – covering the particular information or activity being proposed.
- **Recorded** – consent must be documented either in writing or through secure digital systems.

Where consent cannot be obtained (e.g., in an emergency), information should only be shared if it is legally justified and in the best interest of the individual, in line with safeguarding or data protection regulations.

Media Consent

Permission must be obtained before using any individual's image, voice, or personal information for publicity, promotional materials, or external communications, including social media, websites, and printed materials.

All staff and volunteers are expected to:

- Seek **explicit, written consent** from individuals or guardians before taking and using images, video, or personal stories.
- Clearly explain the **purpose**, intended **audience**, and potential **distribution platforms** for any media used.
- Respect an individual's right to refuse consent without consequence.
- Ensure all permissions are **appropriately recorded and stored**.

Photographing and Recording Children, Young People and Vulnerable Adults

Visual documentation can play a valuable role in celebrating achievements and creating lasting memories. However, safeguarding considerations must always take precedence.

The following guidelines must be adhered to when photographing or recording children, young people or Vulnerable Adults:

1. Obtain Prior Consent

- Verbal or written permission must be obtained from the child, young person or vulnerable adult (if appropriate) and their parent or guardian.
- Children, Young People, Vulnerable adults and their parents/carers should be informed about:
 - i. Why the images are being taken.
 - ii. How they will be used.
 - iii. Who will have access to them.

2. Minimise Risk of Misuse

- Avoid including personal details (e.g., surnames, addresses, emails, phone numbers) with images.
- Take care not to identify those in vulnerable circumstances or in a way that could facilitate harm.
 - Where possible, **group photos** should be used rather than individual close-ups.

3. Public Events

- At large, public events (e.g., sports competitions), general crowd shots do not require individual permissions. However, extra care should be taken if individuals are the focus of an image.

4. Sensitive Contexts

- Special consideration should be given in small or rural communities where even first names may identify a child, young person or vulnerable adult.
- Youth leaders must check whether any parents/carers have objected to their child, young person or vulnerable adult being photographed in group or individual settings.

5. Online Use

- Always obtain **written and specific parent/carers consent** before publishing any images of children, young people or vulnerable adults on websites or social media platforms.

(See also Appendix 6)

13. Adult to Child, Young Person or Vulnerable Adult Ratios

To ensure the safety and wellbeing of children and young people, Zest of Mind will maintain appropriate adult-to-child ratios based on the age, needs, and context of each group.

Minimum Recommended Ratios:

We recommend having at least two adults present when working with or supervising children and young people. The following adult to child ratios represent the minimum numbers to help keep children safe:

- **Under 2 years** - one adult to three children (1:3)
- **2-3 years** - one adult to four children (1:4)
- **4-8 years** - one adult to six children (1:6)
- **9-12 years** - one adult to eight children (1:8)
- **13-18 years** - one adult to ten children (1:10)

Additional Considerations:

- We recommend having at least two adults present, even with smaller groups
 - Depending on the needs and abilities of the children, young people/vulnerable adults and the nature of the activity, more adults than the minimum may be required
 - If young people are helping to supervise younger children, only people aged 18 or over should be included as adults when calculating adult to child ratios
 - Staffing levels will be determined through risk assessments and adjusted accordingly to reflect the nature of the activity, the environment, and any behavioural or support considerations
 - While it may not always be possible to meet recommended ratios exactly, we are committed to taking all reasonable steps to provide adequate supervision at all times
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14. Monitoring and Review

Zest of Mind commits to regular monitoring of safeguarding practices to ensure compliance and relevance, including:

- Annual policy reviews
- Reviews in response to changes in legislation or guidance
- Auditing training records and recruitment processes.
- Evaluating safeguarding incidents to identify learning opportunities.

Confirmation of Reading

All staff and volunteers are required to confirm they have read and understood the Safeguarding Policy.

Employee Acknowledgement

I confirm that I have read, understood, and will comply with Zest of Mind's Safeguarding Policy and Procedures.

- Name:
- Signature:
- Date:

This form must be completed and submitted to the Designated Safeguarding Lead or Operations Administrator on paper or electronically