North Devon Mental Health Service Users Forum
Clarity
104a Boutport Street
Barnstaple
EX31 1SY
Charity Number 1055224

Clarity Mental Health Services

Policy for:	P12 Safeguarding
V 1	08 2021
V2	08 2022
V3	08 2023
V4	01 2024
V5	07 2024
V6	11 2024
V7	06 2025
V8	08 2026

Clarity acknowledges that not all sections of this policy will be relevant due to the nature of the work conducted. We will endeavour to uphold the values and principles set out within this document, and where appropriate, and when circumstances arise, amend our policy to include and reflect changes as required.

Approved By:

Name	Role	
Clare Fowler	Charity Manager	25.06.2025

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Safeguarding Policy

Clarity is committed to maintaining the highest standards of honesty, openness, and accountability and we are committed to protecting people who come into contact with our charity, from abuse, harm and mistreatment.
This policy is designed to enable staff, volunteers, trustees, and others connected with Clarity to raise concerns about safeguarding in a confidential and constructive way and sets out how we recognise, prevent, respond to and report safeguarding concerns. It protects individuals who speak up in the public interest.
We encourage all employees, volunteers, partners, and other stakeholders to raise any concerns they may have about safeguarding, improper conduct, wrongdoing or malpractice in a confidential and constructive way.
This policy can be read in conjunction with the following:

P1 - Anti Harassment	**Code of Conduct**
P2 - Complaints	**P10 – Modern Slavery**
P3 – Confidentiality	**P14 – Risk Management**
P6 - EDI	**P15 - Whistleblowing**
P8 – Health & Safety	**P18 – Supervision**

BACP Good Practice in Action materials

Working with risk in the counselling professions GPiA 120	working-with-risk-fs-gpia120-jan-24.pdf
Suicide risk when working in the counselling professional GPiA 126	bacp-suicide-risk-ro-gpia-126.pdf
Safeguarding children and young people GPiA 031	bacp-safeguarding-children-and-young-people-lr-gpia031-july25.pdf
Safeguarding vulnerable adults GPiA 030	bacp-safeguarding-vulnerable-adults-lr-gpia030-feb25.pdf
Suicide: issues for counselling professions GPiA 057	bacp-suicide-issues-for-the-counselling-professions-lr-gpia057-aug25.pdf
Working with domestic abuse within counselling profession GPiA 116	bacp-working-with-domestic-abuse-fs-gpia116-july24.pdf

1. Roles and Responsibilities

- Board of Trustees: The Board has ultimate responsibility for ensuring this policy complies with legal obligations.
- Charity Manager: Will be responsible for implementing and monitoring procedures to enable accurate and timely reporting.
- All Staff & Volunteers are expected to adhere to the principles and procedures outlined in this policy.

  Designated Safeguarding Lead

  Clare Fowler 07857 464027 manager@claritynorthdevon.org.uk

  Deputy Safeguarding Leads

  Sam Webber 01271 267 474 samw@claritynorthdevon.org.uk &
  Maria Julian 01271 267 474 maria@claritynorthdevon.org.uk

2. Clarity's Responsibilities

Clarity is committed to supporting any individuals who raise risk or safeguarding concerns and includes:

- Offering guidance and support throughout the reporting and investigation process
- The charity will take appropriate action to protect the safety and well-being of the individual raising the concerns as well as the parties concerned.
- An appropriate person will assess and, if needed, investigate the matter.
- You will be kept informed of progress, subject to legal and confidentiality limits.
- You can raise concerns anonymously, though this may limit our ability to respond fully.
- Following a safeguarding incident, support will be offered to service users, staff, volunteers and Trustees, as appropriate.

2a. Designated Safeguarding Lead (DSL)

Responsible for receiving safeguarding concerns, assessing risk, consulting statutory agencies, making referrals, maintaining safeguarding records and providing safeguarding advice.

Deputy DSL - Acts in the absence of the DSL.

3. Staff Responsibilities

Report any safeguarding concern immediately to the Designated Safeguarding Lead or Deputy DSL.

Staff, volunteers and counsellors must:

- Complete safeguarding training.
- Record concerns promptly.
- Participate in supervision.
- Understand confidentiality limits.
- Escalate concerns without delay.
- Treat any raised issues or concerns with respect and in confidence.

3a. Clinical Supervisors

Support counsellors in assessing and managing safeguarding and clinical risk concerns.

4. Purpose and scope

- **Adults at risk (18+).** We follow the Care Act 2014 and *Care and Support Statutory Guidance* (DHSC).
- **Everyone who interacts with us** (beneficiaries, staff, volunteers, trustees, contractors, visitors), consistent with Charity Commission guidance for trustees.
- This policy applies to both face-to-face and remote service delivery

5. Our safeguarding commitments

We will ensure that counsellors are supported through supervision and safeguarding consultation when managing risk relating to suicide, self-harm, abuse, exploitation or serious mental health deterioration.

1. **Promote welfare and prevent harm** through safe environments, safe practice, and early help.
2. **Identify, assess and respond** promptly to concerns about abuse or neglect (inside or outside the home, including online)
3. **Work in partnership** with local safeguarding partners (local authority, police, Integrated Care Board) and relevant agencies.
4. **Follow adult safeguarding duties**: make or support Section 42 enquiries via the local authority when criteria are met.
5. **Create an open, safe culture** where concerns can be raised and are addressed, and serious incidents are reported.
6. **Share information lawfully and confidently** to protect people, following DfE information sharing advice (updated 1 May 2024).

6. Legal and guidance framework

- **Children:** Children Act 1989/2004; *Working Together to Safeguard Children 2023* (statutory).
- **Adults:** Care Act 2014 (Sections 42–46); *Care and Support Statutory Guidance* (updated July 22, 2025).
- **Charities:** Charity Commission *Safeguarding and protecting people for charities and trustees*.
- **Information sharing:** DfE *Information sharing advice* (2018, updated Apr/May 2024).
- **Local arrangements:** led by three statutory safeguarding partners; LADO manages allegations against people in positions of trust.
- Mental Capacity Act 2005
- Counter-Terrorism and Security Act 2015
- Modern Slavery Act 2015
- Human Rights Act 1998

7. Definitions and types of harm

- **Child:** anyone under 18.
- **Adult at risk:** an adult with care and support needs, at risk of abuse or neglect, and unable to protect themselves because of those needs.
- **Abuse/neglect:** physical, emotional/psychological, sexual, domestic abuse, financial/material, organisational, discriminatory, neglect/acts of omission, self-neglect; including online harms, exploitation and grooming, Radicalisation, County Lines Exploitation, Modern Slavery, Human Trafficking, FGM, Forced Marriage, Child Exploitation, both sexually and criminally.

8. Roles and responsibilities

- **All trustees, staff and volunteers** must read, understand and follow this policy; complete induction and refresher training; and report concerns immediately.
- **Designated Safeguarding Lead (DSL)**: Leads on day-to-day safeguarding; advises staff; liaises with statutory partners; oversees referrals and records.
- **Deputy DSL(s):** Provide cover and support.
- **Supervisors/Managers:** Ensure safer practice, supervision, file audits, incident escalation, and staff wellbeing.
- **All counsellors (including students/placements):** Adhere to this policy and relevant professional codes; manage confidentiality in line with safeguarding and information-sharing guidance.

9. Safer recruitment and suitability checks

We will:

- Use fair, transparent recruitment with role descriptions, application forms, interviews, references, and gaps-in-employment checks.
- **DBS**: Obtain appropriate Disclosure and Barring Service checks for roles working with children or adults at risk; maintain a secure check register and renewal/Update Service arrangements.
- Verify identity, qualifications, registration (where applicable), and right to work; and provide safeguarding induction before unsupervised contact.

10. Training, supervision, and culture

Induction: All personnel receive safeguarding induction, code of conduct, boundaries, lone-working, record-keeping, and information-sharing.

Refresher: At least every **2 years** (or sooner if guidance changes), with annual updates/briefings.

Clinical supervision: Counsellors receive regular safeguarding-aware supervision to discuss risk, thresholds, and escalation.

Promote a whistleblowing culture; ensure people feel safe to raise concerns.

11. Conduct, boundaries, and safe practice

- Maintain professional boundaries and avoid dual relationships; use approved communication channels; keep accurate, timely case notes.
- **Online safety:** Manage risks of *content, contact, conduct* on digital platforms; moderate and monitor organisational channels; protect client privacy; follow online risk guidance referenced by Charity Commission.
- **Data protection:** Apply UK GDPR and the Data Protection Act 2018, recognising these do **not** prevent sharing to protect someone from harm.
- **Counsellors** must not engage in personal social media relationships with current clients
  should avoid relationships that could impair professional judgement.
- Accept gifts and hospitality without first referring to a Clinical Manager or Supervisor.

12. Recognising concerns

Indicators may include disclosures, behavioural changes, injuries, controlling relationships, financial exploitation, neglect, self-neglect, online grooming, or third-party reports. If in doubt, **share your concern** with the DSL.

Suicide Risk

Suicidal ideation

- Suicide planning
- Suicide intent

Self-Harm

- Current self-injury
- Escalating self-destructive behaviour

Mental Health Deterioration

- Psychosis
- Extreme distress
- Loss of contact with reality

13. Responding to concerns (children)

If a child is at risk or being harmed:

1. **Immediate safety:** If urgent, call **999**.
2. **Do not investigate.** Listen, reassure, avoid leading questions; note the facts (date/time/who/what/where).
3. **Inform the DSL** ASAP (and within the same working day).
4. **Referral:** DSL will refer to Children's Social Care via the local Multi-Agency Safeguarding Hub (MASH) following *Working Together 2023* thresholds and practice standards.
5. **Positions of trust:** If the concern involves someone working/volunteering with children, DSL will contact the **Local Authority Designated Officer (LADO)**.
6. **Record-keeping:** Keep secure records of concerns, decisions and actions.

7. **Parents** should normally be informed unless doing so would increase risk to the child.
8. **All referrals** should be documented using the organisation's safeguarding recording procedures.
9. **Counsellors** must continue to consult their supervisor throughout the safeguarding process.

14. Responding to concerns (adults at risk)

Where an adult appears to meet Care Act criteria and is at risk of abuse/neglect:

1. **Immediate safety:** If urgent, call **999**.
2. **Mental capacity and wishes:** Consider the adult's views, desired outcomes, and capacity; support their choice unless risk of serious harm, coercion, or children affected.
3. Where capacity is lacking, decisions should be made in the person's best interests
4. **Inform the DSL.**
5. **Section 42 enquiry:** DSL will raise a safeguarding concern with the local authority; cooperate with enquiries; involve advocacy if required.
6. **Record-keeping:** As above.

15. Information sharing and confidentiality

- Safeguarding **takes priority** over privacy where failure to share may place a child at risk of harm; similar principles apply when protecting adults at risk.
- Follow the **seven golden rules** and lawful bases under UK GDPR/DPA; consent is not usually the most appropriate basis in safeguarding contexts.
- Share necessary, proportionate, relevant, accurate, timely and secure information with agencies; record decisions and rationales.

15a. Limits of Confidentiality

Counsellors will explain confidentiality and its limits during assessment and contracting.

Include:

- safeguarding concerns
- risk to self
- risk to others
- terrorism offences
- court orders
- serious crime
- Any disclosure without consent must be recorded with rationale.

16. Managing allegations against staff/volunteers

Children: Notify the DSL immediately; DSL consults the **LADO** and follows local procedures.

Adults: Notify the DSL; DSL refers to the local authority adult safeguarding team if Care Act criteria are met and manages HR processes accordingly.

Trustees: ensure fair processes, suspension where necessary, secure records, and referral to DBS where appropriate. Inform professional bodies where appropriate.

17. Serious incident reporting (Charity Commission)
Trustees must consider reporting **serious incidents** (actual or alleged) to the Charity Commission where there is significant harm, risk of harm, or reputational damage to the charity (including safeguarding incidents).
Decisions regarding Charity Commission reporting should be documented.

18. Working with partners and referrals
We will cooperate with:

- **Local safeguarding partners** (local authority, police, ICB) for children; publish our arrangements and contribute to multi-agency practice standards.
- **Safeguarding Adults Board** processes and reviews, providing information as requested under the Care Act.

Local contact details

- Children's Social Care/MASH:
- Adult Safeguarding (local authority
- Police: 999 (emergency) / 101 (non-urgent).

19. Risk management and governance

- Maintain a **safeguarding risk register**; review regularly at board level; ensure appropriate policies (code of conduct, lone-working, online safety, data protection, complaints & whistleblowing).
- Annual **policy review** and assurance report to trustees, including training, incidents, actions and learning.
- Present quarterly to Trustees any :- incidents, training, complaints, policy updates and risk register updates.

20. Counselling-specific provisions

- **Consent and confidentiality:** Explain limits of confidentiality (safeguarding, serious harm, terrorism, court orders) during contracting; obtain informed consent for therapy while clarifying mandatory reporting routes.
- **Case notes:** Keep factual, contemporaneous notes; store securely; restrict access on a need-to-know basis.

- **Remote sessions:** Verify identity, ensure private spaces, manage emergency plans, and follow online safety guidance.
- **Supervision & escalation:** Supervisors ensure timely escalation of safeguarding risks; DSL available for consultation.

20a. Clinical Risk Management

Procedures should be in place to address the following:

Clients who present a risk of:

Suicidal Ideation or intent.

- Assessment
- Safety planning
- Escalation routes
- Emergency procedures

Self-Harm

- Assessment process
- Escalation thresholds

Domestic Abuse

- Risk assessment
- MARAC referrals where appropriate

Missing Clients

- Welfare check arrangements

Online Counselling

- Verify client location at each session where risk is identified
- Emergency contact details retained
- Procedure for sudden disconnection

21. Complaints, concerns and whistleblowing

We encourage any person to raise concerns about practice or safety. Complaints are handled under Clarity's complaints procedure; whistleblowing is protected and concerns can be escalated to external bodies where appropriate.

Safeguarding concerns should be reported through safeguarding procedures.

Concerns relating to misconduct, fraud or malpractice should be reported through the Whistleblowing Policy.

22. Monitoring and continuous improvement

We will review incidents and near-misses, gather feedback, and implement improvements. Where appropriate, we will participate in multi-agency reviews and act on recommendations.

We will review :

- safeguarding records
- referral quality
- supervision records
- training compliance
- lessons learned

Findings will be reported to trustees and incorporated into service improvement plans.

A) Quick guide: what to do if you're worried about a child or adult at risk

1. **Is anyone in immediate danger?** Call **999**.
2. **Preserve evidence** (do not investigate).
3. **Tell the DSL** immediately.
4. **Record** the concern (facts only, signed/dated).
5. **DSL acts:** referrals to statutory services; consult LADO for positions of trust; consider serious incident reporting; ensure support for the person affected and staff involved.
6. National LADAO Network

B) Information sharing – the essentials

- UK GDPR/DPA and human rights law **do not** prevent sharing when needed to safeguard.
- Share **necessary and proportionate** information with relevant agencies; document your lawful basis and decision.

References

Care and support statutory guidance - GOV.UK

Information sharing advice for safeguarding practitioners - GOV.UK

national-lado-network.co.uk – The Website of the NLN. Working for Safer Children's services

safeguardingmatters.co.uk/safeguarding-bodies/

Trustees' safeguarding duties | NCVO

Aims and Principles of all Adult Safeguarding

Child Protection Services « | Devon Services

Devon has a duty to keep vulnerable adults safe and away from harm