

Talkback UK

Safeguarding Adults at Risk

Policy & Procedures

Nov 2025

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Policy Accountability	Trustees and Chief Executive Officer
Policy Owner	Head of Operations
Lead Contact	Yasmin Ahmed
Procedure Available:	Shared Drive and Breathe HR Online

AIM

Talkback UK Ltd is dedicated in providing its members access to services that build skills, provide positive engagement with others, offer person centred support, advocacy and a learning journey all within a culture that promotes safety and takes the wellbeing of each and every member to its heart.

The procedures outlined in this policy will be followed alongside the Safeguarding Procedures, Absent and Missing Persons, Talkback Prevent Policy, Whistleblowing Policy and Procedures, Talkback Positive Behaviour Support Policy, Data Protection Policy, Employee Toolkit and Talkback Health and Safety Handbook.

SCOPE

This policy applies to all trustees, staff, volunteers, members, and professional partner agencies. It is the responsibility of Talkback Management to make all staff, volunteers, members and parents/carers aware of this policy and any related procedures.

POLICY

Safeguarding is defined as 'protecting an adults right to live in safety, free from abuse and neglect'. (Care and Support statutory guidance, chapter 14 ii)

Adult safeguarding is about preventing and responding to concerns of abuse, harm or neglect of adults. Staff should work together in partnership with adults so that they are:

- Safe and able to protect themselves from abuse and neglect
- Treated fairly and with dignity and respect
- Protected when they need to be
- Able easily to get the support, protection and services that they need.

We recognise our responsibility to take all reasonable steps to promote safe practice and to protect adults at risk from harm, abuse and neglect. Talkback UK Ltd acknowledges its duty to act appropriately with regards to any allegations towards a member of staff or volunteer, or towards any disclosures or suspicion of abuse.

Talkback UK Ltd believes that:

- Safeguarding adults is everyone's business and responsibility.
- The welfare of all our members is paramount and no abuse is acceptable.
- All Talkback members, whatever their age, culture, ability, gender, language, ethnicity, religious or spiritual beliefs and/or sexual identity, have the right to protection from abuse and neglect.
- We have a duty to promote positive wellbeing for our members as well as act as a preventative measure against the risk of abuse and neglect.
- All allegations, reports or suspicions of abuse should be taken seriously and responded to in a swift and appropriate manner.

Talkback UK Ltd will ensure that:

- All members will be treated equally and with respect and dignity.
- The welfare of each member will always be of highest priority.
- Bullying (in any form) is neither accepted nor condoned.
- Action will be taken to stop any inappropriate verbal or physical behaviour.
- There is a clear line of accountability with regards to safeguarding concerns.
- Staff and volunteers will be kept updated with regard to changes in legislation and policies for the protection of adults at risk.
- Staff and volunteers will undertake relevant and appropriate development and training in relation to safeguarding adults at risk.
- All staff and volunteers within the organisation are fully aware of their responsibilities to safeguarding and their duty to members accessing Talkback services and that they fully understand the correct process for reporting concerns.
- Staff are aware of their duty to be vigilant and the procedures within their programmes on how to raise **wellbeing concerns**, so that action can be taken before harm can occur.
- Where abuse or neglect has occurred, steps should be taken to prevent it from reoccurring wherever possible, doing so within relevant parameters but sharing intelligence to support a holistic partnership approach to prevention.

All staff and volunteers working within Talkback UK Ltd must:

- Understand the different categories of abuse and neglect, and how to recognise the signs.
- Understand their responsibility to report any concerns that an adult is being or is at risk of being abused or neglected. This includes reporting any concern they may have regarding another staff member or volunteer's behaviour towards an adult.
- Understand the line of accountability for reporting safeguarding concerns and be fully aware of the organisation's Safeguarding and Wellbeing Teams.
- If appropriate, liaise with other agencies, contribute to safeguarding assessments and attend adult at risk meetings/core groups/ conferences.

All Talkback UK Ltd staff must attend regular safeguarding training and be alert to the possible signs of abuse. Abuse of an adult at risk may consist of a single act or repeated acts. It may occur as a result of a failure to undertake action or appropriate care tasks. It may be an act of neglect or an omission to act, or it may occur where a vulnerable person is persuaded to enter a financial or sexual transaction to which they have not, or cannot, consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the individual.



TYPES OF ABUSE:

We should not limit our view of what constitutes abuse or neglect, as they can take many forms, and the circumstances of the individual should always be considered.

Below are illustrations of abuse and abusive behaviours, however, is not an exhaustive list and has been included for guidance only.

Location of abuse

Abuse can take place anywhere. For example:

- the person's own home, whether living alone, with relatives or others
- day or residential centres
- supported housing
- work settings
- educational establishments
- care homes
- clinics hospitals
- prisons
- other places in the community.

Who might abuse?

Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the adult with care and support needs. A wide range of people may harm adults. These include:

- a spouse/partner
- an adult with care and support needs
- other family members
- neighbours
- friends
- residents
- people who deliberately exploit adults they perceive as vulnerable to abuse
- paid staff or professionals and
- volunteers and strangers.

Making Safeguarding Personal (MSP)

'Making Safeguarding Personal' (MSP) approach, aims to promote responses to safeguarding situations in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety. It is about seeing people as experts in their own lives and working alongside them to identify the outcomes they want, with the aim of enabling them to resolve their circumstances and support their recovery.

Making Safeguarding Personal is also about collecting information about the extent to which this shift has a positive impact on people's lives. Therefore, Talkback will work in partnership with statutory agencies once a referral is made to ensure our members' voice is heard and they are supported in making choices that impact their lives.

The 'Wellbeing Principle'

The Care Act 2014 introduces a duty to promote wellbeing when carrying out any care and support functions in respect of a person. This is sometimes referred to as "the wellbeing principle" because it is a guiding principle that puts wellbeing at the heart of care and support.

The wellbeing principle applies in all cases where carrying out any care and support function, or making a decision, or safeguarding. It applies equally to adults with care and support needs and their carers.

"Wellbeing" is a broad concept, and it is described as relating to the following areas in particular:

- personal dignity (including treatment of the individual with respect)
- physical and mental health and emotional wellbeing
- protection from abuse and neglect
- control by the individual over day-to-day life (including over care and support provided and the way it is provided)
- participation in work, education, training, or recreation
- social and economic wellbeing
- domestic, family, and personal
- suitability of living accommodation
- the individual's contribution to society

Promoting "wellbeing" means actively seeking improvements, at every stage in relation to the adult with care and support needs (regardless of whether they have eligible needs or not) and carers.

At Talkback we believe that early intervention and positive wellbeing support is vital to help address our members' needs, which can reduce risk factors and increase protective factors in our members' lives. Early help can offer members the support needed to reach their full potential, improve their quality of life and enable them to support their mental and emotional wellbeing.

Staff are encouraged to flag concerns or worries they may have or feel to Senior Team members, who can offer practical advice and support and work closely with parents/carers and other agencies to ensure appropriate support is in place. Further details of what types of wellbeing concerns should be flagged can be found in **Talkback Raising a Concern Procedure** on BreatheHR.

The Talkback UK Ltd Safeguarding Team

All organisations working with adults at risk should have a Designated Safeguarding Lead in place. The Designated Safeguarding Lead (DSL) at Talkback UK Ltd is Head of Operations, Governance and Quality Assurance and Assistant Designated officers are Head of Programmes, together they will also ensure that correct action is taken, following a concern raised and that the Talkback UK Ltd Safeguarding Adult at risks Policy is being fully adhered to.

At Talkback any safeguarding or wellbeing concerns can be discussed with the relevant programme senior team members. Senior staff will give advice and guidance and support staff member to raise a safeguarding concern. Staff should follow the procedures on how to raise a concern.



The Head of Programme will assess and discuss the concern with Talkback DSL and will contact the local authorities Safeguarding Teams, dependent on the region, if the concern needs to be escalated.

DISCLOSURES

If an adult makes a disclosure, then staff/ volunteers will ensure that **Talkback Safeguarding and Wellbeing Raising a Concern Procedures** will be followed.

Head of Programmes will help to determine the correct course of action based on the level of need, discuss with DSL and will take action in line with the local authorities Safeguarding Adults Board procedure and will refer to the Thresholds Document to inform decision making.

ALLEGATIONS OR CONCERNS REGARDING A MEMBER OF STAFF OR VOLUNTEER WITHIN YOUR ORGANISATION

Staff members or volunteers may have concerns regarding behaviour they have witnessed from another member of staff or volunteer towards adult at risks. Staff should follow the Talkback Whistleblowing Policy and Procedure. If you do not wish to report concerns to your line manager, then these concerns should be reported to:

Designated Safeguarding Lead: Yasmin Ahmed Yasmin.ahmed@talkback-uk.com Tel: Amersham Office : 01494 434448 / Mobile 07419989005

Talkback People Services will be consulted at the earliest opportunity in order that appropriate support can be provided via the organisation's employee welfare arrangements.

Talkback People Services will follow procedure under Legislation and Guidance / Managing allegations against staff and volunteers working with adults in the document below:

<https://www.buckssafeguarding.org.uk/adultsboard/wp-content/uploads/sites/3/2020/08/Managing-Concerns-or-Allegations-Against-Staff-and-Volunteers-Working-with-Adults-who-have-Care-and-Support-Need.pdf>

Talkback is committed to following safer recruitment practices in line with the Buckinghamshire Safer Recruitment Toolkit.

TRAINING

All Talkback staff are required to undertake mandatory safeguarding training within their probation period.

All Talkback staff and volunteers must undertake online Level 1 Adults Safeguarding training and attempt refresher training every three years.

Talkback UK Ltd also has a duty to prevent adults at risk from being drawn into terrorism. Therefore, PREVENT training is provided to all Talkback staff via e-learning. All staff have a duty to keep themselves up to date with all Talkback UK Safeguarding Policies and Procedures and follow timely information and advice given by Safeguarding Lead.

RECORDING & RECORD RETENTION and CONFIDENTIALITY & INFORMATION SHARING

When a staff member is dealing with a disclosure and shares that information with the Talkback Safeguarding Teams, it is the Talkback Designated Safeguarding Lead's and Deputy DSL (Head of Programmes) , responsibility to ensure that the information is shared, recorded and stored in a confidential way on Talkback Safeguarding system CPOMS.

Talkback recognises that information sharing is vital to safeguarding and promoting the welfare of adults. It is also an intrinsic part of any frontline practitioner's job when working with adults. Decisions about how much information to share, with whom and when, can have a profound impact on individuals' lives, therefore in the first instance Staff members SHOULD NOT share information with other colleagues, volunteers and members when raising a concern. At Talkback UK Ltd, it is the Designated/ Deputy Safeguarding Leads responsibility to brief staff and teams and share relevant information.

Designated / Deputy Safeguarding Leads will follow guidance from:
Safeguarding Adults Multi Agency Policy and Procedures / Record Keeping and Sharing :
<https://www.bucksadultsmapp.co.uk/>

Allegations against Staff

All Talkback staff should take care not to place themselves in a vulnerable position with a member.

We understand that a member may make an allegation against a member of staff. If such an allegation is made, the member of staff notified of the allegation will immediately inform their Line Manager, who will inform the Head of People Services and Head of Safeguarding, who will contact the Local Authority Designated Officer (LADO). The purpose of an initial discussion is for the LADO and the Head of Safeguarding to consider the nature, content and context of the allegation and agree a course of action.

The Head of Safeguarding and Head of People Services will:

- Follow all advice given by the LADO throughout the investigation process, including how to manage the staff member or volunteer against whom the allegation is made, as well as supporting other staff and volunteers within the workplace.
- Follow all advice given by the LADO relating to supporting the member(s) making the allegation, as well as other members and young people connected to the Programme at Talkback.
- Ensure feedback is providing to the LADO about the outcome of any internal investigations within Talkback

If the allegation made to a member of staff concerns the CEO or Leadership Team member, the person receiving the allegation will immediately inform the Chair of Trustees who will consult the LADO as above without notifying the CEO first.



Transfer of Risk and People in Position of Trust (PIPOT)

Should an individual staff member or volunteer be involved in child protection, other safeguarding procedures or Police investigations outside of their Talkback role then they must immediately inform the Head of People Services. In these circumstances, the Head of People Services working closely with the Head of Safeguarding will need to assess whether there is any potential for risk of transfer to the workplace and the individuals' own work with Talkback members or vulnerable people.

Talkback is committed to following safer recruitment practices in line with the Buckinghamshire Safer Recruitment Toolkit and Talkback UK Ltd Safeguarding Lead will discuss with LADO whether a referral should be made to the Disclosure and Barring Service (DBS) for consideration of inclusion on the barred lists; or to refer to relevant regulatory body e.g. the Teaching Agency.

It is a legal requirement for Talkback UK Ltd to make a referral to the DBS where they think that an individual has engaged in conduct (including inappropriate sexual conduct) that harmed (or is likely to harm) an adult at risk; or if a person otherwise poses potential harm to an adult at risk.

Escalation, Challenge and Whistleblowing

At Talkback we have a separate Whistleblowing Policy which can be found on BreatheHR and all Talkback sites. Staff are required to familiarise themselves with this document during their induction period.

All staff are aware of their duty to raise concerns about the attitude or actions of colleagues within Talkback or staff/ volunteers within other professional agencies. If staff are concerned regarding malpractice or misconduct in a workplace, they should speak to the designated 'Whistleblowing' Officer which at Talkback is the Head of Safeguarding or the designated Safeguard Trustee, whose details can be obtained from the Business Operations Coordinator & Contract Lead.

The safety of adults at risk is the paramount consideration in any professional disagreement and any unresolved areas should be addressed with due consideration to the risks faced by the vulnerable person. All Talkback staff should feel to be able to challenge decision-making and to see this as their right and responsibility in order to promote the best multi-agency safeguarding practice.

Any concerns should be raised with the Designated Safeguarding Lead – who will follow guidance from the Bucks Adult Safeguarding Board:

<https://www.buckssafeguarding.org.uk/adultsboard/resources/reviews-annual-reports-policies-procedures/>

E-SAFETY

Information and Communications Technology (ICT) covers a wide range of resources including web-based and mobile learning. It is also important to recognise the constant and fast-paced evolution of ICT within our society.

At Talkback UK Ltd we understand the responsibility to educate our members in e-Safety issues; teaching them the appropriate behaviours and critical thinking to enable them to remain both safe and legal when using the internet and related technologies, in and beyond the context of the sessions within Talkback Projects.

All staff should follow good practice on E-safety and adhere to the following policies and procedures in terms of the internet, use of social media and electronic contact with adults: **Talkback Employee Toolkit, Data Protection Policy and Talkback Health and Safety Handbook.**

Talkback recognises the Online Safety Act 2023, which introduces new criminal offences such as cyberflashing, sharing 'deepfake' intimate images without consent, and controlling or coercive behaviour via technology. Staff must be aware that these are now criminal offences and should report any concerns through the safeguarding procedures outlined in this policy.

Any concerns should be raised with Designated Safeguarding Lead or Business Team.

Visitors

Talkback staff arranging visits must follow the Visitors Policy and Procedures within Talkback Health & Safety Handbook. There is also specific guidance around Managing VIPs, Celebrity visitors and media and these need to be managed by Senior Management at all times.

Visitors should always be escorted to their point of contact OR their point of contact will be asked to come to reception to receive the visitor. The contact will then be responsible for them while they are on site. The visitor should not be allowed to move around the site unaccompanied or meet with a member unaccompanied unless consent had been gained in advance and relevant identity checks (Organisation details / DBS / purpose meeting) have been made.

Visitors should be given a copy of Talkback Safeguarding Adults Policy upon request. These will contain the names of the Designated and Assistant Safeguarding Officers and be encouraged to report any incidents or concerns about the conduct of any adult on the site.

PHOTOGRAPHY AND USE OF IMAGES

As confirmed in the Talkback UK Ltd Data Protection Policy, Programme Senior Teams will ensure written consent is sought from the adult at risk or their carer before any photographs are taken. If consent is given, Talkback will make a clear agreement with the adult at risk or their carer as to how the image will be used (for example, in a brochure or on our website) and how widely (as part of a newsletter for all parents, on the partner website). Due consideration will be given to appropriate clothing and posture, and details such as a name or age will not be shared unless integral to the use of the image (such as the acceptance of an award).

It is the responsibility of the staff member taking the image to establish that appropriate permission has been received from the adult at risk/their carer. If staff has any concerns regarding images taken or being used, they should raise their concerns to their Senior teams or the Talkback Designated Safeguarding Lead.



Definitions

Who do Adult Safeguarding duties apply to?

In the context of the legislation, specific adult safeguarding duties apply to any adult who:

- Has care and support needs, and
- Is experiencing, or is at risk of, abuse or neglect, and
- They are unable to protect themselves from either the risk of, or the experience of abuse or neglect, because of those needs.

These adults may be known as 'Adult at Risk' and are any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and/or support. Where someone is over 18 but still receiving children's services and a safeguarding issue is raised, the matter will be dealt with by the Adult Safeguarding Team.

Forms of abuse are:

Neglect: Examples of neglect and acts of omission include 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.

Self-neglect: The Care Act 2014 has introduced a broader concept of 'adults in need of care and support' and is explicit that self-neglect falls within the remit of Adult Safeguarding policies and procedures, if the person concerned has care and support needs. Statutory guidance states 'self-neglect covers a wide range of behaviour - neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.'

It is good practice to consider the following aspects in relation to self-neglect:

- A lack of care for self to an extent it threatens personal health & safety,
- Neglecting to care for personal hygiene, health or surroundings,
- An inability to avoid harm to self,
- A failure to seek help or access services to meet health or social care needs,
- An inability or unwillingness to manage personal affairs.

Physical abuse: Including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions. Indicators of physical abuse are often evident, but they may also be hidden by either the abuser or the person concerned. All unexplained injuries should always be fully investigated.

Female Genital Mutilation (FGM) is another form of physical abuse. This involves procedures that intentionally alter or injure female genital organs for non-medical reasons. There are no health benefits to the procedure for either girls or women. The Female Genital Mutilation Act 2004 makes it illegal to practice FGM in the UK or to take girls who are British Nationals or permanent residents of the UK abroad, for FGM, whether or not it is lawful in another country.

Domestic Abuse: This type of abuse can include, but is not limited to psychological, physical, sexual, financial or emotional contexts. Common features where Domestic Abuse is occurring are the presence of Coercion and Control. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Honour Based' Abuse: 'Honour Based' abuse is a crime and should be reported to the Police. It occurs in circumstances where a family or community feel that dishonour has been brought to them. Both women and men can be victims, and the violence is often committed with a degree of collusion from family members and/or the community.

Forced Marriages: Forced marriage is a term used to describe a marriage in which one or both parties are married without their consent and against their will. This differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse. The UK Government describes this as taking someone, usually overseas, to force them to marry (whether the forced marriage takes place) or marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not). Breaching a Forced Marriage Protection Order is also a criminal offence.

Sexual Abuse: Examples of sexual abuse include 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 individual has not consented or was pressured into consenting.

Psychological Abuse: Examples of psychological abuse include 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.

Financial or Material Abuse: Examples of financial or material abuse include theft, fraud, internet scamming, coercion in relation to an adult financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Modern Slavery: This definition 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 or inhumane treatment.
<https://www.buckssafeguarding.org.uk/adultsboard/information-for-the-public/modern-slavery/>
<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

Discriminatory Abuse: Examples of discriminatory abuse include forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.



Organisational Abuse: The Care Act statutory guidance defines organisational abuse as; “the mistreatment or abuse or neglect of an adult at risk by a regime or individuals within settings and services that adults at risk live in or use, that violate the person's dignity, resulting in lack of respect for their human rights”

Exploitation

Exploitation is the deliberate manipulation or abuse of power used to have control over another person, usually for some form of gain. This can be for a range of reasons including personal, financial or sexual.

- **Sexual Exploitation:** Adult Sexual Exploitation (ASE) is a form of sexual abuse that involves someone taking advantage of an adult, sexually, for their own benefit through threats, bribes, and violence. Adults can be exploited in many ways, and anybody can be a victim of sexual exploitation, including men.
- **Cuckooing:** Cuckooing is a practice where criminals take over a person's home and use the property to facilitate exploitation. It takes its name from cuckoos who take over the nests of other birds. The most common form of cuckooing is where drug dealers or gang members take over a person's home and use it to store or distribute drugs. They may begin by befriending the adult at risk and will then offer the adult at risk something of interest to them, this could be a relationship, friendship, drugs or alcohol (or both), money or clothing.
- **County Lines:** County lines is when criminals from larger cities expand their drug networks to other areas of the country – usually rural and suburban areas. The 'lines' refer to mobile phones that are used to control a vulnerable person who is delivering drugs, often to towns outside their home county. These criminals often exploit adult at risks to move and store drugs and money and regularly use coercion, intimidation, violence (including sexual violence) and weapons. County lines activity can still be classed as exploitation even if it appears consensual. It can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.

Prevent and Radicalisation: PREVENT is a key element of the Government's Counter Terrorism Strategy and is aimed at stopping people from supporting or participating in terrorism. The Counter Terrorism and Security Act 2015 contains a PREVENT duty for statutory agencies. At its heart, is the concept of early intervention to divert people away from being drawn into terrorist activity. Radicalisation is defined by the UK Government within this context as “the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups”.

Relevant Legislation and Information sources

This policy has been developed in accordance with the principles established by:

- The Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005 and the Code of Practice
- Managing Concerns or Allegations against Staff and Volunteers Working with Adults who Have Care and Support Needs
- Buckinghamshire Multi-Agency Information sharing for Adults, Information-Sharing Code of Practice Sept 2025
- [Buckinghamshire Safeguarding Adults Board \(buckssafeguarding.org.uk\)](https://www.buckssafeguarding.org.uk)

- Statutory Guidance issued under section 29 of the Counter Terrorism and Security Act 2015/ Revised Prevent duty guidance for England and Wales, updated March 2025
- Serious Crime Act 2015, Mandatory Reporting of Female Genital Mutilation, January 2020
- The Equality Act 2010
- The United Nations Convention on the Rights of the Child (UNCRC)

We will take account of further guidance issued by the DfES, Police and the Local Authority.

Monitoring and Reviewing

This policy has been developed in accordance with Bucks County Council Safeguarding Adults Multi-Agency Adult Policy and Procedures and will follow all legislation, principles and guidance with Working in Partnership Multi Agency Policy and Procedures from the Safeguarding Adults Board: <https://www.bucksadultsmapp.co.uk/contents/>

Talkback has declared its commitment to establishing, developing, implementing and reviewing this policy. Effective record keeping and monitoring, and acting on information gathered, are essential in order to measure effectiveness and develop safeguards. Talkback Trustees and management will review the policy annually, unless there are legal requirements to do so sooner.

The Executive overall responsibility for ensuring adherence to and implementation of this policy lies with the Board of Trustees and Chief Officer.



APPENDIX: 1 –

Local Authorities Safeguarding Teams and useful contact details:

Talkback UK Ltd works across Buckinghamshire, Milton Keynes and Berkshire. Advice should be sourced from the relevant Local Authority Team:

Buckinghamshire:

Adult:

Report a Concern for Adults via the Buckinghamshire Council Referral Portal Link
<https://www.buckssafeguarding.org.uk/adultsboard/report-a-concern/report-a-concern-professionals/>

During Office Hours:

9am – 5.30pm Monday to Thursday or 9am – 5pm on Friday
Tel: 0800 137 915

Outside office hours:

Emergency Out of Hours Tel: 0800 999 7677

E-mail: ascfirstresponse@buckinghamshire.gov.uk

Children:

BSCB - Bucks Safeguarding Children Board

Consult the BSCB threshold document in the first instance:

<https://www.buckssafeguarding.org.uk/childrenpartnership/professionals/continuum-of-need/>

<https://www.buckssafeguarding.org.uk/childrenpartnership/wp-content/uploads/sites/2/2021/04/A3-COFN-incorporating-the-Threshold-guidance-April-2021-Version-3.0.pdf>

If it is thought that the need has reached level 3 or 4, submit a concern via the online portal:

<https://www.buckinghamshire.gov.uk/care-children-and-families/child-protection-and-safeguarding/#report-a-concern-about-a-child>

You can also discuss any concerns by calling: **First Response Team** Tel: 01296 383962
Monday to Thursday 9am to 5.30pm, Friday 9am to 5pm

If you need an urgent response outside of these hours, call the Emergency Duty Team (EDT) on 0800 999 7677

If a child is in immediate danger, call 999 or report a crime on 101

Education Safeguarding Advisory Service	01296 382 912
Education Safeguarding Advisor	01296 382 732
Local Authority Designated Officer (LADO)	01296 382 070
RU Safe? (Barnardo's – Child Exploitation Service)	01494 461 112
NSPCC: Call 0800 389 5347 or email help@nspcc.org.uk	

Milton Keynes:

Adults: Follow the guidance and use the online portal from the link below

<https://www.milton-keynes.gov.uk/adult-social-care/safeguarding-adults-and-children/worried-about-adult>

Tel: 01908 252835

Email: safeguardingadults@milton-keynes.gov.uk

Adult Social Care Out of Hours and Bank Holidays contact information

Tel: 01908 725005 - 5:00pm -9:00am Monday-Friday Weekends & Bank holidays 24 hrs,

Children:

For information advice and Guidance use the link below:

<https://www.milton-keynes.gov.uk/children-young-people-and-families/childrens-social-care/worried-about-child>

Report your concerns about the safety and wellbeing of a child to the Multi-Agency Safeguarding Hub (MASH) 9am-5pm Mon-Thurs and 9am-4.30pm on Fri by:
calling 01908 253169 or 01908 253170

email: children@milton-keynes.gov.uk

Outside these hours contact the Emergency Social work team on 01908 265545.

Berkshire (Reading)

Safeguarding Adults - 0118 937 3747 / 01344 786 543 out of hours

Child Protection

Children's Single Point of Access - 0118 937 3641

Domestic Abuse

BWA Helpline - 0118 950 4003

National Domestic Violence helpline: 0808 2000 247



Talkback UK Ltd
Raising Safeguarding/Wellbeing
Concerns Procedures November 2025

Prevention – Positive Wellbeing – When to Raise a Wellbeing Concern

At Talkback we believe that early intervention and positive wellbeing support is vital to help address our members' needs, which can reduce risk factors and increase protective factors in our members lives. Early help can offer members the support needed to reach their full potential, improve their quality of life and enable them to support their mental and emotional wellbeing.

Staff are encouraged to flag concerns or worries they may have or feel to Senior Team members, who can offer practical advice and support and work closely with parents/carers and other agencies to ensure appropriate support is in place.

Therefore, staff are expected to log these concerns in their end of day session or daily report and then flag this to their Senior Team member. Below are some examples of when wellbeing concerns should be flagged; this list is not exhaustive and if at any time you feel something is not right, then contact a Senior Team member to discuss.

- A member is absent from sessions or regularly late to their sessions.
- A member displays a change in behaviour, or behaviour that has not been recognised in their support plan.
- A member does not have the resources to access sessions.
- A member is experiencing emotional and mental difficulties that are impacting their engagement at Talkback – for example, bereavement.
- A member displays poor personal hygiene or arrives in dirty, scruffy, or otherwise unsuitable clothing.
- If regularly a member arrives without lunch or any money to purchase lunch.

Once you have raised a concern, Senior Team members will work closely with you and their Programme Heads to assess the situation, provide appropriate support and advice, and log all wellbeing concerns on CPOMS, so that the situation can be monitored and appropriately escalated, if ongoing.

Safeguarding Concerns

A safeguarding concern can be anything from a feeling that something is not right to a disclosure made by an individual or an incident either witnessed or heard. There are no hard and fast rules for raising safeguarding or wellbeing concerns; if you have a feeling that something isn't right then you **must** raise it. However, if there are signs of abuse or if a member has disclosed information that gives you cause for concern, then please follow the procedures below.

Dealing with Incidents and Disclosures

Disclosure: If a member discloses to you that abuse or inappropriate behaviour has taken/is taking place, you should:

- Listen to the person. Allow them to tell you what has happened in their own way, and at their own pace.
- Remain calm. Be reassuring and supportive and try not to respond emotionally.
- Do not ask leading questions. Only ask questions if you are seeking clarification about something they have said. **Use TED: Tell, Explain, Describe.**
- When you are able to, make an accurate record of what you have been told, taking care to note any times, dates or locations mentioned. Use the person's own words where possible. Do not substitute anatomically correct names for body part names used by the person. (For example, if the term 'my tummy' is used, don't change it to 'stomach' when



reporting.) Make some very brief notes at the time and write them up in detail as soon as possible.

- Reassure the person that they did the right thing in telling someone and that you are glad they told you. Reassure the person that they have not done anything wrong.
- Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns, however, reassure the young person that you will only share the information with the right people, who will be able to help them. Explain what you will do next.
- At your earliest opportunity, contact a member of your Senior Team to discuss the disclosure; **do not discuss with others**. Follow this up by submitting a Safeguarding/ Wellbeing Concern (SWC) Form.

How to deal with the following Incidents

Sexting / Sharing of nude or semi nude images - For someone of the age of 18 years old, Sexting is known as Image-based sexual abuse – This is when someone sends or receives a sexually explicit image, video or text on their mobile phone, computer or tablet. It can include sexual chat or requests for pictures/images of a sexual nature.

The creation, taking, and sharing of intimate images without consent (often referred to as "revenge porn") are criminal offences in the UK. This includes sexually explicit "deepfakes". The law considers the intent and impact of the behaviour, and severe cases can constitute significant illegal activity. Due to the vulnerabilities of adult members at Talkback, they are at risk of exploitation so careful support and assessment needs to take place by the Safeguarding teams to establish if consent has been given and the members have the understanding of the impact of sharing of the images.

If Staff become aware that a sexually explicit image, video or text is on a member's mobile phone, computer or tablet and is being shared, then they must:

- Try to find out a bit more about what's happened, including who sent the image and who has seen it. Never view or save explicit images, videos or messages.
- Notify a member of the Senior Team or Head of Safeguarding immediately.
- If you have already seen the image by accident (e.g., if a member has shown it to you before you could ask them not to), this must be reported to the Head of Safeguarding and appropriate support will be made available.
- Never view, copy, print, share, store or save the image yourself, or ask a member to share or download – **this is illegal**.
- Do not delete the image or ask the member to delete it.
- Do not ask the member(s) who is/are involved in the incident to disclose information regarding the image to others.
- Do not share information about the incident with other members of staff, students, parents or carers.
- Do not say or do anything to blame or shame any young person involved.
- For Under 18 year old members, the Head of Programmes and Head of Safeguarding will assess the situation, call the police and follow guidance in the provided by NSPCC: <https://learning.nspcc.org.uk/safeguarding-child-protection/safeguarding-examples-issues-concerns#sexting>
- For over 18 years old members, Head of Programmes and Head of Safeguarding will provide help and support and call the Police if they believe an offence may have been committed. (<https://safeline.org.uk/be-informed/information-resources/sexting/>)

Sexual Harassment – Peer to Peer

If staff witness or become aware of any of the below, then staff must intervene immediately and ask the member to stop as it could be deemed as sexual harassment and this then also needs to be reported to a member of the Senior Team:

- Sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance or calling someone sexualised names,
- Sexual 'jokes' or taunting,
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature,
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include sharing of sexual images and videos,
- Sexualised online bullying; unwanted sexual comments and messages, including on social media; sexual exploitation; coercion and threats.

Senior Teams will inform Head of Programme & Head of Safeguarding and who will assess to see if this is a one-off incident or have there been other concerns. In all cases, where bullying is taking place, action should be taken to address the needs of the victims and the perpetrator and to provide appropriate support and services. Bucks Safeguarding Teams should be contacted for appropriate advice.

Assault and Acts of Violence

If staff witness an incident of assault between members whilst on a Talkback site then they must act immediately, always keeping their own safety in mind. They must:

- Seek support from other staff to help diffuse the situation, and alert Senior Team members,
- Seek medical help if there are injuries,
- If minor injuries (scrapes/bruises) then the Senior Team member must arrange a meeting with parent/carers and follow the Positive Behaviour Support Policy to understand why the behaviour took place,
- Monitor the situation and escalate if they see signs/risks of this happening again,
- If injuries require medical assistance and/or there is a weapon involved, then Head of Programmes/Head of Safeguarding must report to the Police (see below),
- In all cases, disclosures of Domestic Violence/Gang-related violence must be reported to the Police by Head of Safeguarding/Head of Programmes,
- At all times a SWC/AIH must be completed and submitted accordingly.

Incident involving weapons/possession of illegal substances

If Staff become aware that a member is carrying a weapon (e.g., knife/knuckle duster/any other sharp object that could cause injury) carrying illegal substances, such as drugs, or consuming inappropriate substances such as alcohol on a Talkback site or in a Talkback programme, then they must take the following action:

- Inform a member of the Senior Team/Head of Programme immediately,
- Undertake a search of the individual **by asking them** to empty their pockets and bag, ensuring that another member of staff is present to act as witness and that the search takes place in a safe and secure environment away from other members,
- Record all actions taken including times of each discussion and steps taken.
- Head of Programmes/Head of Safeguarding must call the Police if a weapon/ illegal substance is found,
- Any weapons/illegal substance found in the member's possession should be taken from them, secured and sealed into a bag and handed to the Police. The member needs to be advised that this is against Talkback Policies as it is illegal to carry such items and Talkback have a legal duty to hand over any 'weapons' and illegal substances to the Police.



- Parents/Carers will need to be notified and will need to come and collect the member from Talkback, once a police report has been made. A follow up meeting will be arranged by the Head of Programme with the member and parent/carer to assess the situation and make a decision on the next steps.
- It will be the duty of the Police to investigate the matter further to determine whether an offence has been committed.

Whistleblowing

If you witness behaviours/actions towards people with a learning disability by another member or by a member of staff, a volunteer or a visitor, that make you uncomfortable, then you must let a manager know immediately. It is a dismissible offence to mistreat a person with a learning disability and/or Autism in any way and we cannot emphasise enough how seriously these matters are taken. Please rest assured that we welcome concerns being raised and would encourage you to do so. For example, if you become aware that a staff member has befriended a member on social media or is in contact after work hours. It could be that the way a member of staff is engaging / communicating with a member is inappropriate or could be seen as bullying behaviour. Any and all allegations or witness reports will be taken seriously and treated in complete confidence. Please refer to Talkback Whistleblowing Policy and Procedures on Breathe HR for further advice and guidance.

Completing a Report of Disclosures/Incidents

Once you have followed the procedures above on how to deal with a disclosure/ incident then, you must complete a written report with details of all actions taken, by completing a **SWC**.

- **All witnesses must complete a separate SWC**, giving their account of the disclosure/ incident.

The completed SWC Form must be submitted to:

- safeguarding.team@talkback-uk.com;
- **The Senior Team Member to whom you initially reported the incident,**
- **The Head of the Programme that the member attends.**

What happens next?

The Head of Programme or a member of the Programmes Senior Team may need to make contact with you again to gather further information. The matter will first be assessed by the Heads of Programmes to establish the safest course of action for the person/people concerned; they will escalate to Head of Safeguarding if the level of concern is high and requires Social Care/Police intervention. Decisions on the correct course of action will be made using the Threshold Document from the Local Safeguarding Board as well as relevant advice and guidance from the Local Authority Safeguarding teams for Adults/Children.

Feedback to Staff

At all times it is the responsibility of the Senior Team member/Head of Programme to keep you informed of the actions taken. However, there are times when it may not be possible to disclose details due to Police investigations or as advised by Social Care. If this is the case, you will be informed of the situation.

Confidentiality and Sharing Information

Once you have raised the concern, confidentiality needs to be maintained. Therefore, when submitting an end of day report for the person, details of the disclosure should NOT be given at any time. A statement of action should be given, such as 'safeguarding concern raised to the Safeguarding/Wellbeing Team'. A member of the Senior Team will provide guidance on what can be shared internally and externally.

If you have any concerns or clarification needed on any aspect of this policy, please talk to your manager.