

Talkback UK Ltd

Safeguarding Children and Young People

Policy and Procedures

Nov 2025

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Policy Owner	Head of Operations
Lead Contact	Yasmin Ahmed
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AIM

Talkback is fully committed to safeguarding and protecting the welfare of all children and young people.

We recognise our responsibilities to take all reasonable steps to promote safe practice and to protect children and young people from harm, abuse and neglect. Talkback UK acknowledges its duty to act appropriately with regard to any allegations towards a member of staff or volunteer, or in response to any disclosures or suspicion of abuse.

This policy refers to all children and young people under the age of 18 years accessing Talkback services. Talkback UK Ltd recognises its duty of care to safeguard children and young people.

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

Talkback UK believes that:

- The welfare of all children and young people is paramount.
- All children, whatever their age, culture, ability, gender, language, ethnicity, religious or spiritual beliefs and/or sexual identity, have the right to protection from abuse.
- All allegations, reports or suspicions of abuse should be taken seriously and responded to in a swift and appropriate manner.

Talkback aims to provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of our members. Talkback, therefore, will ensure that:

- All children and young people will be treated equally and with respect and dignity.
- The welfare of each child will always be of the highest priority.
- Bullying (in any form) is neither accepted nor condoned.
- Action will be taken to stop any inappropriate verbal or physical behaviour that affects a young person's mental, emotional and physical health.
- There is a clear line of accountability with regard to safeguarding concerns.
- Staff and volunteers will be kept updated with regard to changes in legislation and policies for the protection of children and young people.
- Staff and volunteers will undertake relevant and appropriate development and training in relation to safeguarding children and young people.
- All staff and volunteers within the organisation are fully aware of their responsibilities for safeguarding and their duty to the children and young people in their care and fully understand the correct process for reporting concerns.
- Positive action is taken to enable all young people to have the best outcomes.

Responsibilities

Talkback Board of Trustees understands and fulfils its safeguarding responsibilities by:

- Ensuring that measures are in place to have oversight of how Talkback delivers its responsibilities.
- Ensuring safeguarding is an agenda item at each Board meeting and a report is presented by the Head of Safeguarding, highlighting any gaps and concerns.
- Nominating a Safeguarding Trustee, who will support the Head of Safeguarding and the CEO in compiling these reports and be available as and when required for cases that have been escalated due to sensitivity or Police investigations.
- Ensuring the Chair or, in their absence, the Nominated Safeguarding Trustee makes themselves available to liaise with relevant agencies if an allegation is made against the CEO.

The Board will ensure that Talkback's procedures for safeguarding and protecting members from harm are in line with Buckinghamshire County Council and Buckinghamshire Safeguarding Children Board Child Protection Procedures, *Working Together to Safeguard Children 2018* and *Keeping Children Safe in Education 2023*, and statutory guidance issued under section 29 of the *Counterterrorism and Security Act 2015*.

The CEO will ensure that Talkback has a Designated Safeguarding Lead in place. At Talkback the following Safeguarding Team structure has been put in place:

Designated Safeguarding Lead: Head of Operations Governance and Quality Assurance

Deputy Safeguarding Leads: All Heads of Programmes

Wellbeing Teams: Senior Managers and Co-ordinators.

The Designated Safeguarding Lead (DSL) and Deputies will ensure that correct action is taken following a concern being raised, and that the Talkback UK Ltd Safeguarding Children and Young People Policy is being fully adhered to.

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

Senior Team members will discuss concerns with Heads of Programmes who will assess, action and if necessary, escalate the concern to the Talkback DSL. Together a decision will be made about whether to escalate the concern to the local authority's Safeguarding Teams or the police, depending on the assessment and if deemed necessary.

The CEO and the Head of Safeguarding understand and fulfil their responsibilities by:

- Ensuring the Children and Safeguarding Policies are implemented and understood across the organisation and reviewed annually.
- Ensuring that safe and effective recruitment policies and disciplinary procedures, which adhere to Safer Recruitment Practices, are in place.
- Ensure that Talkback meets local authority Safeguarding Audit requirements.



- Ensure that relevant resources and adequate training is provided across all levels of the organisation to meet safeguarding responsibilities as required within the Local Authority Training Frameworks.

Heads of Programmes and their Senior Teams understand and fulfil their responsibilities by ensuring that:

- Staff and volunteers have been given an opportunity to access, read and understand their responsibilities as set out in the Talkback Children and Young People's Policy.
- Staff and volunteers are allocated time to complete Safeguarding training.
- Staff and volunteers are supported in raising a concern and feedback is given in a timely manner.
- Any wellbeing concerns raised by a member are addressed, logged and monitored.
- All wellbeing and safeguarding concerns are logged on Talkback Record keeping Software, CPOMS.
- They escalate to the Head of Safeguarding any concerns that may need Social Care or Police intervention.

All staff and volunteers working within Talkback UK Ltd understand that safeguarding children and young people is **everyone's responsibility**. Everyone who comes into contact with children and their families has a role to play. This means that they should always consider what is in the best interests of the child / young person. In order to do this all staff and volunteers will:

- Read, understand and adhere to the Talkback Safeguarding Children and Young People Policy, and all related policies as mentioned, so that a safe working environment is created.
- Complete all relevant safeguarding training within the required timeframes.
- Understand the different categories of abuse and neglect, and how to recognise the signs, as listed in Appendix 1.
- Recognise that some parents/carers may require additional support in raising their children, for example because of mental health issues, substance misuse or domestic abuse.
- All staff should be prepared to identify children/young people who may benefit from early help. Early help means providing support as soon as a problem emerges.
- Understand their responsibility to report and flag any concerns that a child/young person is being, or is at risk of being, abused or neglected. This includes reporting any concern they may have regarding the behaviour of another staff member or volunteer towards a child or children.
- Understand the line of accountability for reporting safeguarding concerns and be fully aware of the organisation's Safeguarding Lead and deputies and their role within the organisation.
- If appropriate, liaise with other agencies, contribute to safeguarding assessments and attend child protection meetings/core groups/conferences.

Training

At Talkback the Head of Safeguarding will work closely with HR to ensure appropriate training is provided to All Senior Teams, staff and volunteers. It is mandatory that:

- All staff and volunteers working with children and young people undertake Level 1 Safeguarding Awareness training and attend refresher training every two years.
- All staff undertake mandatory safeguarding training during their probation period.
- Staff/Volunteers also complete PREVENT training via e-learning on the BSCB website, as well as with relevant partner agencies.
- Staff/Volunteers complete more focused training as rolled out by the Head of Safeguarding in relation to issues such as Knife Crime, County lines etc.
- Senior Management Teams attend events/workshops recognised as part of their CPD within their safeguarding and wellbeing role.

In addition, the Head of Safeguarding will give regular safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide staff with relevant skills and knowledge to safeguard children and young people effectively.

Prevention

We recognise that Talkback plays a significant role in the prevention of harm to our members by providing effective lines of communication with trusted adults, supportive friends and an ethos of protection.

Positive Wellbeing – Supporting Members

We recognise that the young minds of our members can be vulnerable and may be exploited by others. Therefore, staff will be alert to the signs of vulnerability and/or susceptibilities to violent extremism, grooming or indoctrination and report concerns via our safeguarding and child protection procedures.

We recognise that Talkback may provide the only stability in the lives of young people who have been abused or who are at risk of harm; we therefore take our responsibilities seriously.

We accept that research shows that the behaviour of a young person in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn. Research also tells us that young people with special needs are at an increased risk of abuse. Changes in mood, patterns of behaviour and responses to stimuli around them may be wrongly attributed to their disability. Staff are therefore trained to question behaviours and be **professionally curious** about changes noticed; all staff are required to be prepared to 'think the unthinkable', raise concerns and ensure safeguards are in place. We recognise that members with communication difficulties may be especially vulnerable, and for this reason we link behaviour with safeguarding; '**listening to behaviours**', acknowledging that not all members will be able to verbalise what may be troubling them.

Staff understand the need for a culture of vigilance to be present in Talkback to support safeguarding. This includes awareness of, and sensitivity to changes in the attitudes of members that may indicate that they are at risk of radicalisation.



Through training, staff and volunteers are aware that members' behaviours may pose a risk to themselves and their peers. When a member of staff or a volunteer becomes aware of this type of behaviour, they must flag it to a member of the Senior Team who will assess it and give appropriate advice. All concerns will be dealt with sensitively, confidentially and in line with Talkback Procedures and Policies.

At Talkback we will support all members by:

- Encouraging the development of self-esteem, resilience and critical thinking in every aspect of Talkback life, including through the curriculum of our programmes.
- Promoting a caring, safe and positive environment within Talkback.
- Monitoring all absences and promptly addressing concerns about irregular attendance with the parent/carer and the young person, as per the Talkback Absent and Missing Person Policy.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of young people and using the expertise and resources of colleagues in the other service areas, to promote the welfare of members.
- Ensuring staff work with Thames Valley Prevent Officers and the Channel Panel to support and safeguard a member if they are thought to be vulnerable to or espousing radical political ideologies.
- Ensuring staff are sensitive to the needs of members who are 'looked after', recognising that they are likely to have encountered difficulties and challenges which may mean they are disproportionately affected by the behaviours of their peers, e.g., teasing, bullying or when negotiating relationships.
- Seeking appropriate advice, support and guidance to enable us to critically evaluate safeguarding information and concerns, and to act on them appropriately.

We include within this the emotional wellbeing of our members and recognise the role Talkback plays in identifying vulnerability and preventing the political indoctrination of members either by self-radicalisation or through exposure to extremist views. We are aware of the Prevent duty to protect young people from radicalisation and extremism and all staff are expected to understand and adhere to the Talkback Prevent Policy and Procedures.

We recognise that many of our members may be socially vulnerable and be affected by the behaviours of their peers or vulnerable to the influence of others. We will work in partnership with colleagues in other agencies to promote the wellbeing of members. We understand that safeguarding and protection of members must be viewed within the context of the member's lived experience and the factors around him/her which may affect this – friends, family, college and their community.

We will also provide learning opportunities to build the skills of our members to enable them to stay safe from both physical and emotional harm and to know to whom they should turn for help. Members are encouraged to seek help and support and are provided with information about how to access this if they are encountering problems at home or elsewhere.

Whilst we strive to work together with families, staff understand that sharing information with parents may not always be appropriate; we ensure that decisions of this nature are made in partnership with Children's Social Care or the police.

Talkback will also work effectively with partner agencies, seeking advice, support and guidance, drawing on multi-agency expertise, knowledge and experience to support members at risk of harm, including emotional and intellectual harm via social media and use of the internet.

Disclosures

If a young person/child makes a disclosure, then the ***Talkback Safeguarding Raising a Concern Procedures*** will be followed.

The Head of Programmes, working closely with the Head of Safeguarding, will help to determine the correct course of action based on the level of need, and, where appropriate, can assist with making a referral to Children's Social Care or Police

Action will be taken in line with the Safeguarding Children's Board procedure for, 'What to do if you are concerned about a child', and reference will be made to the Threshold Document for decision making.

Confidentiality and Information Sharing

We recognise that all matters relating to child protection are confidential.

The Talkback Safeguarding Team will disclose personal information about a member to other members of staff on a need-to-know basis only. This will be governed by BSCB Information Sharing Protocols.

We are aware that we have a professional responsibility to share information with other agencies in order to safeguard children. Child protection concerns will be uploaded securely on the Talkback Safeguarding Record keeping system CPOMS by Senior Team members. These records are kept separately from the member's records. Duplicate records should NOT be kept by any member of staff.

All staff are aware they cannot promise a member to keep secrets which might compromise their safety or wellbeing, or that of someone else. Staff will however reassure the member that information will only be shared with those people who will be able to help them and therefore need to know.

We will always share our intention to refer a young people person to Social Care (First Response) with their parents/carers, unless to do so could put them at greater risk of harm or impede a criminal investigation. In any situation where a child is at risk of harm, consent is not required.

The *Data Protection Act 2018* and UK GDPR do NOT prevent the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent where there is a good reason to do so, and where the sharing of information will enhance, in a timely manner, the safeguarding of a child but it is not possible to gain consent, cannot be reasonably expected that a practitioner gain consent or if consent would place a child at risk.

We will also follow guidance from:

- BSCB Multi Agency Information Sharing Code of Practice August 2017
- HM Government Information Sharing Guidance July 2018
- Seven Golden Rules for Information Sharing

Supporting Staff and Volunteers

We recognise that staff who have become involved with a member who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their



anxieties with a member of the Senior Team, receive supervision and seek further support, if necessary, from HR. Talkback also provides an Employee Assistance Programme (EAP) that offers expert advice, invaluable information, specialist counselling and support. Volunteers are supported by a buddy, their Line Manager and HR throughout their placement at Talkback.

Our Code of Conduct forms part of the Employee Toolkit and is provided at staff induction. It gives detailed advice on the boundaries of appropriate behaviour in order to define and underpin the safe working practices adhered to within Talkback. All staff are required to sign to indicate that they have read, understood and agree to comply with the standards of practice set out in the Employee Toolkit.

The Head of Safeguarding and the CEO are supported appropriately by the Board and nominated Safeguarding Trustee, as well as having access to support as above and appropriate workshops, courses or Forums as organised by the County Council.

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 to another member of staff, that member of staff 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 LADO and the Head of Safeguarding will 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 making the allegation, as well as other members and young people connected to the Programme at Talkback.
- Ensure feedback is provided 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 a Leadership Team member, the person receiving the allegation will immediately inform the Chair of Governors who will consult the LADO as above, *without* first notifying the CEO.

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

Should an individual staff member or volunteer be involved in a child protection issue, 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 individual's own work with members or vulnerable people.

Talkback is committed to following safer recruitment practices in line with the Buckinghamshire Safer Recruitment Toolkit, and the Talkback UK Ltd Safeguarding Lead will discuss with LADO whether a referral should be made to the Disclosure and

Barring Service (DBS) for consideration for inclusion on the barred lists, or to refer to a 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) a child, or if a person otherwise poses a risk of harm to a child.

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 within other professional agencies. If staff are concerned about malpractice or misconduct in a workplace, they should speak to the designated Whistleblowing Officer, who at Talkback is the Head of Safeguarding, or the designated Safeguarding Trustee, whose details can be obtained from the Business Operations Coordinator and Contract Lead.

The safety of children and young people at risk is the paramount consideration in any professional disagreement, and any unresolved areas should be addressed with due consideration to the risks that might exist for the child/young person. All Talkback staff should feel 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 Head of Safeguarding, who will follow Bucks Safeguarding Children Board Escalation, Challenge and Conflict Resolution Procedure.

<http://bscb.procedures.org.uk/pkalg/joint-working-procedures-and-guidance/escalation-challenge-and-conflict-resolution-procedure/>

Anti-Bullying

At Talkback we have an agreed definition of bullying which is: 'an action by a person who habitually seeks to harm or intimidate those whom they perceive as vulnerable'. Members, staff, parents and carers are supported to understand this definition. We have measures in place to prevent and respond to all forms of bullying, which acknowledges that to allow or condone bullying may lead to a review under child protection procedures. This policy is available to all staff, volunteers, members and their parents and carers.

Staff, volunteers, members and their parents/carers are made aware of how mobile technologies are increasingly being used to bully young people. Cyberbullying is therefore referenced within our E-Safety section.

Talkback recognises its responsibility for E-Safety and expects staff to create a safe online environment for members. In line with Keeping Children Safe in Education 2025, online safeguarding now includes wider digital risks such as misinformation, disinformation and conspiracy theory content, as well as traditional risks (sexual exploitation, grooming, cyberbullying). Staff should therefore:

- keep up to date with the Talkback Online Safety policy and the DSL's guidance on filtering and monitoring;
- be alert to the growing risks from rapidly evolving technology, including AI



tools and deepfakes, and follow DfE and local authority resources on safe technology use;

- report online harms to the Senior Team and DSL

Talkback will review our filtering and monitoring arrangements in light of DfE tools and guidance, and we will signpost members and families to approved support resources.

Physical Intervention/Positive Handling

Our policy on physical intervention/positive handling by staff is set out separately as part of our Positive Behaviour Support Policy. It complies with the Department for Education Guidance, *The Use of Reasonable Force: Advice for Headteachers, Staff and Governing Bodies*, July 2013. This policy states that staff may only use 'reasonable force', meaning no more force than is needed, to prevent young people from hurting themselves or others, from damaging property, or from causing disorder. It is always unlawful to use force as a punishment.

Staff will follow risk assessments and will get authorisation before use of such force, if it is deemed reasonable to do so in the circumstances, in order to conduct a search for the following 'prohibited items': knives and weapons, alcohol, illegal drugs, stolen items, cigarettes and tobacco, fireworks, pornographic images, or any article that has been or is likely to be used to commit an offence, cause personal injury or damage property. If the use of such force is necessary, it will be done sensitively and reasonably, taking into account members' sensory and communication needs. This will be recorded and signed by a witness, and the parent/carer will be informed of the incident.

All Talkback Staff are trained to use appropriate non-abusive psychological interventions and positive physical intervention. We understand that physical intervention of a nature which causes injury or unnecessary distress to a young person may be reviewed under child protection or disciplinary procedures.

Racist Incidents

Talkback Equalities and Diversity Policy references how racist incidents will be dealt with and acknowledges the serious nature of these events and their impact on the individual or group of members involved, including those who may witness the incident. All incidents will be taken seriously, and consideration will be given as to whether a multi-agency approach using child protection procedures is required.

Cultural Issues

At Talkback we are aware of the cultural diversity of the community around us and seek to work sensitively to address the unique culture of each member and their family in relation to safeguarding and child protection.

As a staff team we are aware of the harm to children and young people that can be caused by practices linked to culture, faith and beliefs. We promote awareness through training and access to resources. Staff will report concerns about abuse linked to culture, faith and beliefs in the same way as they would report other child protection concerns.

At Talkback we are aware of a range of practices and beliefs which can be classified as honour-based violence; we include within this female genital mutilation, forced marriage and breast ironing. We recognise both male and female pupils may be

subject to honour-based abuse, for instance where a young person's cultural background is at odds with their behaviour, such as homosexuality, under-age sex, relationships or lifestyle choices. Whilst a belief may be a part of a long-held tradition within communities, we categorise honour-based abuse as child abuse and will act according to our safeguarding and child protection processes to safeguard the member concerned.

At Talkback we understand that whilst we try always to work in partnership with families, sharing information with a parent or member of the family is not appropriate in some instances where there may be cultural differences of opinion on abuse. Staff have a duty to report concerns to the Talkback Senior Teams who will liaise with the Head of Safeguarding, working closely with First Response, the police or the Forced Marriage Unit, and follow the advice given regarding protective strategies to safeguard the member.

Health and Safety

Young members who leave the site during their Talkback Day do so only with the written permission of their parent/carer. In the event of a member going missing during the course of their Talkback day, we will carry out immediate checks to verify that the member is not on site; staff will follow procedures as per the Talkback Absent and Missing Vulnerable Persons Policy.

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 as a whole. At Talkback we follow and adhere to The Children's Code (or Age-Appropriate Design Code, as it is formally known), a statutory code of practice under the *Data Protection Act 2018* (DPA 2018).

Talkback recognises its responsibilities for E-Safety and expects staff to:

- Create a safe online learning environment.
- Attend appropriate training to gain skills, knowledge and understanding to help members and young vulnerable people stay safe online, question the information they are accessing and develop critical thinking.
- Inspire and educate for safe and responsible use of, and behaviour in relation to, mobile technologies, to combat online behaviours which may make members vulnerable, including sexting.
- Ensure safe and secure use of camera equipment, including camera phones.
- Be aware of what steps to take if there are concerns, and where to go for help.
- Be aware of policy on staff use of social media as set out in the Staff Social Media section in the Employee Toolkit.

Cyberbullying via texts and emails will be treated as seriously as any other type of bullying and will be managed within the safeguarding and wellbeing procedures. This includes sexting and image exchange under threat, or the use of coercion.



In addition, 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. The DSL will ensure staff are briefed on the implications of the Act and how it interacts with KCSIE 2025 requirements.

Members, staff and volunteers are supported to understand the risks posed by the CONTENT accessed by members – their CONDUCT online – and who they have CONTACT within the digital world.

Talkback UK Ltd will follow good practice and will report any e-safety safeguarding concerns by following BSCB Bullying and E-safety Guidance: <https://www.bucksscp.org.uk/professionals/e-learning/>

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

Sexting or sharing of nudes or semi nudes

'Sexting', also referred to as 'youth-produced sexual imagery', including the sharing of nudes and semi nudes, is one of a number of risk-taking behaviours associated with the use of digital technologies, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with online activity can never be completely eliminated.

Staff, volunteers and members are supported via training to understand that the creation and sharing of sexual imagery, such as photos or videos, of someone under 18 is illegal. This includes imagery made by pupils themselves if they are under the age of 18.

Any youth-produced sexual imagery disclosures will follow the normal safeguarding procedures. We will seek guidance from Child Exploitation and Online Protection, which requires us to share reports of sexting with the Police. If the incident meets the threshold, it may be necessary to refer it to the police promptly; we will always endeavour to speak to the parents/carers of the member involved prior to any report being made to the police.

Peer-to-Peer Abuse

At Talkback we believe all our members have the right to attend our services to learn and develop in a safe environment free from harm. We recognise that some safeguarding concerns can occur via peer-to-peer abuse.

All Talkback staff recognise that peer-to-peer issues may include, but are not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying),

- Abuse in intimate personal relationships between peers,
- Physical abuse, such as hitting, hair-pulling, shaking, biting or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and or/encourages sexual violence),
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse,
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth-produced imagery)
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm – this is a criminal offence under the *Voyeurism Act 2015*
- Initiation/hazing-type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element)

At Talkback we will ensure that we deal with all incidents appropriately and fairly. We shall educate members on how to keep safe and understand what acceptable behaviour looks like, ensuring that all members know that all staff/volunteers will listen to them if they have concerns, and that appropriate action will be taken. Talkback Citizenship Programme will raise awareness of peer-to-peer abuse, sexual harassment, cyberbullying and how to get help. The Talkback Student Code of Conduct clearly states what is acceptable behaviour and how young people can seek help if they do not feel safe at Talkback.

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding and responding to members' experiences of significant harm beyond their families. It recognises that the various relationships that a member forms in their neighbourhoods, colleges and online can feature violence and abuse. Parents and carers may have little influence over these contexts, and member experiences of extra-familial abuse can undermine parent/carer-member relationships.

- At Talkback we recognise that members may encounter safeguarding issues that happen in the wider community, and we will respond to such concerns, reporting to the appropriate agencies in order to support and protect them.
- All staff, and especially the DSLs and their deputies, will consider the context of incidents that occur outside of Talkback to establish if environmental factors may be putting the member's welfare and safety at risk of abuse or exploitation in situations outside their families. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.



- Members who may be alleged perpetrators will also be supported to understand the impact of contextual issues on their safety and welfare.
- In such cases the individual needs and vulnerabilities of each member will be considered.

Serious Violence

- All staff are aware of signs and indicators which may indicate that members are at risk from, or are involved with, serious violent crime. These may include increased absence from college/Talkback, a change in friendships, relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries. Staff are aware that unexplained gifts or new possessions could also indicate that members have been approached by, or are involved with, individuals associated with criminal networks or gangs.
- At Talkback we are aware of the risks to members and will take appropriate measures to manage any situations arising.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, at Talkback, staff have been given awareness training so that they are well placed to observe and identify those whose behaviour suggests that they may be experiencing a mental health problem or are at risk of developing one.

Where children and young people have suffered abuse or neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a concern about a young person's mental health, then they should immediately seek help, advice and guidance from a member of their Senior Team.

Visitors

When Talkback staff are arranging visits, they must follow the Visitors Policy and Procedures in the Talkback Health and Safety Handbook. There is also specific guidance around visits by VIPs, celebrities and media, which need to be managed by Senior Management at all times.

Visitors should always be escorted to their contact person, OR their contact person 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 child/young person unaccompanied unless consent has been obtained from the parent/carers and relevant identity checks (Organisation details/DBS/purpose of meeting) have been made.

Visitors should be given a copy of the Talkback Safeguarding Children and Young People Policy upon request. This contains the names of the Designated and Deputy Safeguarding Officers and encourages the reporting of any incidents or concerns about the conduct of any adult on the site.

Use of Photography

We will often use photographs and film to capture achievements and help promote and celebrate successes within Talkback via our website and Facebook page. We like to be able to share these events with parents. We are, however, mindful of the safety of our members.

As required by the *Data Protection Act 2018*, we will ensure written consent is sought from the member, or the parent or carer of any member under the age of 18, before any photographs are used for publicity and marketing purposes. If consent is given, we will make a clear agreement with the parent or carer as to how the image will be used (for example, in a brochure or website) and how widely (as part of a Talkback newsletter etc.). Our agreement with parents and members includes how images will be stored, for how long they will be stored and how they will be disposed of.

Due consideration will be given to the appropriateness of clothing and posture. Details such as a member's name or age will not be shared unless integral to the use of the image (such as the acceptance of an award), in particular when additional identifiers are being shared. We acknowledge the right of parents/carers and members to withhold or withdraw consent at any point during the time the member is at Talkback.

Retention of Records

When a disclosure of abuse, or an allegation against a member of staff or volunteer has been made, Talkback will have a record of this. These records will be maintained in a manner that is confidential and secure, in accordance with Talkback Retention Policy and Data Protection legislation. We have a duty to pass on any records if requested by the Police or Social Care, especially if the information is required as part of a serious case review.

There is a statutory requirement for Talkback to pass any safeguarding and child protection records to the educational establishment of the member with whom we work, or to the Local Authority. We are required to have an auditable system in place to evidence that we have done so. Any transfer of records will be carried out within the bounds of confidentiality. We are also required to retain a copy of any child protection records we generate until the member reaches the age of 25 years. These records will be stored securely.

If an allegation is made against a member of staff, a comprehensive, confidential summary of the allegation will be kept on their personnel file. This record will be kept by Talkback until the normal retirement age of the staff member involved, or 10 years after the allegation if longer. This record will include a clear outcome, including when cases have been investigated and found to be without substance.

For cases in which an allegation has been proven to be false, unsubstantiated or malicious, the allegation will not be included in employer references, even if that person has been the subject of repeated allegations.

In the instance of repeated allegations, however, Talkback retains the right, in the interests of safeguarding members, to retain a record of concern.

We have a system for reviewing our archives of information held and will only retain information for the agreed time span. All information will thereafter be disposed of via confidential waste management.



Relevant Legislation and Information sources

This policy has been developed in accordance with the principles established by the Children Act 1989 and 2004 and in line with the following:

- Keeping Children Safe in Education – statutory guidance for schools and further education colleges, September 2025 (comes into force 1 September 2025). Talkback will have regard to the updated guidance and any associated DfE resources and links contained within it. Note: KCSIE 2025 introduces technical updates including strengthened references to online harms (for example, misinformation, disinformation and conspiracy theory content) and signposts additional resources; this policy will be reviewed accordingly.
- Working Together to Safeguard Children, 2018
- The Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Buckinghamshire Multi-Agency Information sharing for Children, Young People & Families, Information-Sharing Code of Practice August 2017
- Guidance from Bucks Safeguarding Children Partnership:
<https://www.buckssafeguarding.org.uk/childrenpartnership/>
- Children Missing Education: Statutory Guidance for Local Authorities, September 2016
- Statutory Guidance issued under section 29 of the Counter Terrorism and Security Act 2015/ Revised Prevent duty guidance for England and Wales, updated 10 April 2019
- Sexual Violence and Sexual Harassment between Children – September 2021
- Serious Crime Act, 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.buckssafeguarding.org.uk/blog/2025/10/online-multi-agency-policy-and-procedures/>

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 ONE – Safeguarding Children & Young People – Categories of Abuse

Everyone who works with Children/young people have a duty to safeguard and promote their welfare. They should be aware of the signs and indicators of abuse and know what to do and to whom to speak if they become concerned about a member or if a member discloses to them.

The following is intended as a reference for Talkback staff and parents/carers if they become concerned that a young person / vulnerable adult is suffering or likely to suffer significant harm.

The Children and Act 1989 defines abuse as when a child/ young person is suffering or is likely to suffer 'significant harm'. Harm means ill treatment or the impairment of health or development.

Categories of Abuse - Child/ young person abuse is a form of maltreatment. Somebody may abuse or neglect a young person by inflicting harm, or by failing to **act to prevent harm**. A child/ young person may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place physically as well online, or technology may be used to facilitate offline abuse. Child/ Young person may be abused by an adult or adults, or another young person.

The following are categories and indicators of abuse:

Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person.

Emotional Abuse

The persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on the young person's emotional development. It may involve conveying to a young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on young person. These may include interactions that are beyond a young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social



interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing young person frequently to feel frightened or in danger, or the exploitation or corruption of young person. Some level of emotional abuse is involved in all types of maltreatment of a young person, though it may occur alone.

Sexual Abuse

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

Neglect

The persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a young person is born, neglect may involve a parent or carer failing to: a. provide adequate food, clothing and shelter (including exclusion from home or abandonment) b. protect a young person from physical and emotional harm or danger c. ensure adequate supervision (including the use of inadequate caregivers) d. ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs.

Exploitation

Exploitation is a form of child abuse and may take a number of forms.

Children Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a young person into any criminal activity

- In exchange for something the victim needs or wants, and/or
- for the financial or other advantage of the perpetrator or facilitator and/or
- through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include any child/ young person being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- young person who appears with unexplained gifts or new possessions,
- young person who associate with other young people involved in exploitation,

- young person who suffer from changes in emotional wellbeing,
- young person who misuse drugs and alcohol,
- young person who go missing for periods of time or regularly come home late,
- young person who regularly miss school or education or do not take part in education.

It is important to note that the experiences of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk if criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at a higher risk of sexual exploitation, as set out in the Serious Violence Strategy, published by the Home Office. <https://www.gov.uk/government/publications/police-crime-sentencing-and-courts-bill-2021-factsheets/police-crime-sentencing-and-courts-bill-2021-serious-violence-duty-factsheet>

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children young people in the production of sexual images, forcing young people to look at sexual images or watch sexual activities, encouraging young people to behave in sexually inappropriate ways or grooming a young person in preparation for abuse (including via the internet).

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child/ Young person sexual exploitation does not always involve physical contact; it can also occur through the use of technology. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

We recognise that exploitation includes the trafficking of young people and Modern-Day Slavery. Further guidance can be found: <https://www.gov.uk/government/collections/modern-slavery>

Preventing Radicalisation

Young people are vulnerable to extremist ideology and radicalisation. Similar to protecting young people from other forms of harm and abuse protecting young people from this risk is part of Talkbacks safeguarding approach and addressed in sessions with young people, within the Citizenship Programme.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.



Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

County Lines

As set out in the Serious Violence Strategy (see link below), published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'.

Exploitation is an integral part of the county lines offending model with young person and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Young person can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, young person's homes and care homes. Young people are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. A young person can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and college), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁰³ should be considered. If a young person is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

<https://www.gov.uk/government/publications/serious-violence-duty/serious-violence-duty-accessible>

Cyber -Crime

Cyber-crime is a criminal activity committed using computers and/or the internet. Young people with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependant crime.

If staff have concerns about a young person, they should advise the Senior Team Member and Head of Programme. Working closely with Safeguarding Lead they should consider referring into the Cyber Choices programme. In addition, the Online Safety Act 2023, introduced new criminal offences such as cyberflashing, sharing 'deepfake' intimate images without consent, and controlling or coercive behaviour via technology which are forms of online abuse.

Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

All young people can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on young people. In some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result.



Appendix 2:

Local Authorities Safeguarding Teams and useful contact details:

Talkback work across Buckinghamshire 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? (Barnardos – 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
Talkback Raising Safeguarding/Wellbeing
Concerns Procedures
November 25



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 or sharing of nudes or semi nudes – Sexting 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.

It is against the law for anyone under the age of 18 to possess, share or send explicit or sexual images, even of themselves. For any over the age of 18 years the creation, taking, and sharing of intimate images **without consent** (often referred to as "revenge porn") are also 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 members over 18 years old then Sexting is known as Image-based sexual abuse and this is also a crime, 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://www.victimsupport.org.uk/crime-info/types-crime/image-based-sexual-abuse>)

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.

Cyber Crimes – what are they and what to do

- **Cyberflashing:** Unwanted, indecent images or videos sent to someone.
- **Deepfakes:** AI-generated videos that can be used to create fake, harmful, or embarrassing content.
- **Grooming:** A predator's attempts to build a relationship with a child for sexual purposes.
- **Coercion:** Using threats or pressure to make someone do something they don't want to do online.
- **Harmful Content:** Content that is dangerous, illegal, or not age-inappropriate.

You don't have to gather 'evidence' like screenshots, text messages, videos or photos before you report the incident. All you need to do when you report is tell Your DSL/Senior Teams what happened and include details of the platform etc including senders name. Even if the photo is no longer available, you should still report cyberflashing. The police may be able to recover the image. If you have any screenshots, text messages, videos or photos, details like these can be useful to the police however staff should only screenshot an intimate image if they are sure the person is over 18. If you are unsure, don't screenshot, record, or share it with anyone, even the police. It could be a criminal offence.

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.

