



YHA (England & Wales)
Safeguarding Adults at Risk Policy & Procedures
V1 January 2026

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Part 1 – Safeguarding Policy

1.1 Document Control

Document Control	
Author/s Designated Safeguarding Lead	Contact email safeguarding@yha.org.uk

Version	Comments	Reviewed by	Date
1	Newly created policy - separated from Safeguarding Children Policy		

1.2 Safeguarding Statement

YHA (England and Wales) is committed to providing a safe environment for all who come into contact with our activities or services. By the very nature of our work, many employees and volunteers have contact with children and adults at risk visiting our sites.

YHA will ensure that safeguarding and promoting the welfare of children and adults at risk is embedded across our network. We believe that safeguarding is everyone's responsibility and will strive to deliver a safe and trusted environment.

YHA believes that abuse or neglect of any kind is unacceptable and we recognise our responsibility to safeguard the welfare of all children and adults at risk, by committing to policy, procedures and practices that seek to prevent and protect them from harm.

YHA is a partner of Sports England and is committed to upholding the [Safeguarding Adults in Sport framework](#), to deliver the best possible outcomes to everyone accessing our activities and services.

1.3 Application of Policy & Procedures

Anyone encountering adults at risk in our setting, no matter what position they hold, or whether they are paid or voluntary, must abide by this policy. This includes third parties and sub-contractors.

Failure to follow the principles and requirements of these policies may lead to formal action, which could include disciplinary procedures, investigation, or where an adult at risk has been harmed or is at risk of harm, referral to statutory agencies such as the police or adult social care.

Everyone in our organisation, including the Board of Trustees, has a duty to uphold the highest standards of safer working practice. This means modelling safe behaviours, challenging poor or unsafe practice, and always acting in the best interests of adults at risk.

A full list of contacts can be found in **3.1 Appendix 1 – Safeguarding Contacts**.

If you have an immediate concern about the safety or welfare of an adult at risk, contact the Designated Safeguarding Lead:

Nicky Smith	07977 635663 or 01629 702483 safeguarding@yha.org.uk
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This document is structured in **three parts**:

1. **Safeguarding Policy** – defines our organisational commitment to protecting adults at risk and promoting their welfare.
2. **Safeguarding Procedures** – outlines the required actions when responding to safeguarding concerns, disclosures, and specific situations.
3. **Appendices**- provides additional guidance, definitions and detailed operational procedures relevant to safeguarding within YHA.

1.3.1 Associated Documents

Safeguarding and promoting the welfare of adults at risk covers many areas.

To make sure we keep people safe, we have a range of policies and procedures in place. These should be read alongside this document and followed as appropriate to your role and responsibilities.

Document title	Version	Date
Whistleblowing policy	1.3	May 2024
Safeguarding Children Policy	3.7	January 2026
Safer Recruitment Policy	2.3	June 2024
Employee Handbook	1.3	May 2024
Volunteering Policy		
OHS 31 Event Lost Child Procedure	Unknown	2017
Exclusion Register Policy	3.0	May 2023
YHA Use of Fleet Vehicles Policy	1.1	July 2024
Use of Private Vehicles Policy	1.0	July 2024
HK001 How to Clean a Bedroom	-	-
Use of images (film and photograph)	Unknown	Unknown
DBS Policy & Code of Practice	-	November 2015
OHS 15 Admissions guidance	TBC	TBC
OHS 14a Security Procedure	TBC	TBC
Social Media Policy	1.1	March 2023
YHA ICT Acceptable Usage Policy	1.2	September 2024
Equity, Diversity and Inclusion Policy	1.3	May 2024

Managing Performance Policy	1.5	August 2024
Risk Management Policy	5.2	March 2024
Volunteering policy	1	March 2016

1.3.2 Safeguarding Responsibilities at YHA

At YHA, safeguarding is everyone's responsibility. Formal safeguarding duties are built into every role so that all sites, services and activities are prepared to recognise and respond appropriately to any concerns relating to safeguarding or welfare. This ensures that all employees and volunteers, no matter their role, work in line with best practice and strict expectations for behaviour and conduct.

Safeguarding is considered at both a **governance** and **operational level**. The Board of Trustees and Executive Team provide oversight, resources and a clear strategy to ensure safeguarding remains a key organisational priority. Designated safeguarding staff are in place across the organisation to provide specialist guidance, advice and operational support.

To strengthen this, YHA operates a **Safeguarding Panel** which brings together representation from the sites, as well as from key organisational functions including but not limited to safety, operations, volunteering and youth development and directors. This panel reviews practice, shares learning, monitors risks and ensures safeguarding remains embedded across all areas of our work.

This structure ensures that safeguarding is consistently embedded in decision-making, service delivery and daily practice, and that the welfare of adults at risk is always at the centre of our activities.

Role / Group	Key responsibilities
Board of Trustees	• Ultimate accountability for safeguarding and compliance with <u>Charity Commission</u> requirements • Appointed 'Lead' to act as board champion for safeguarding • Provide strategic oversight and ensure safeguarding is adequately resourced and prioritised by executive team • Promote a positive, open culture where concerns can be raised safely • Review & endorse safeguarding policies, procedures, and practice regularly • Receive and act on outcomes from audits and safeguarding reports • Ensure statutory notification and review requirements are met
Director Responsible for Safeguarding	• Holds strategic leadership for safeguarding across the organisation • Ensures policies and procedures are up to date and robust • Appoints and supports the Designated Safeguarding Lead (DSL) and deputies • Alerts senior leaders to safeguarding risks, issues, or developments

	Oversees safeguarding audits and reports findings to the Board of Trustees
Executive Team & Heads of Department	- Implement safeguarding policies and procedures within their operational areas - Ensure safer recruitment, vetting & workforce management procedures are applied - Support staff and volunteers through supervision, training, and guidance - Promote a culture where concerns can be raised safely - Consider safeguarding in planning, development and review of services, programmes, and activities
Designated Safeguarding Lead (DSL) & Deputies	- Lead day-to-day safeguarding practice and oversight of safeguarding concerns and allegations - Chair the Safeguarding Panel and ensure policy dissemination and understanding - Provide advice, guidance, and training to staff and volunteers - Maintain accurate records and report serious incidents to the Director responsible for Safeguarding - Stay up to date with legislation and best practice
Safeguarding Panel	- Provide expert advice and oversight on safeguarding practice and strategy - Monitor and review safeguarding across the organisation, including audits and serious incident - Advise on safeguarding implications of new projects or identified gaps in policy/practice
Operations Managers & Hostel Managers	- Ensure safeguarding policies are implemented in operational setting - Supervise and support staff and volunteers in safeguarding practice - Manage and report concerns, allegations, and incidents appropriately - Ensure staff and volunteers understand their safeguarding responsibilities and complete regular training
Third-Party Providers (Activity Providers)	- Responsible for assessing reasonable adjustments and supporting inclusion in line with YHA's Inclusion Policy - Operate within the organisation's safeguarding framework and report concerns appropriately

1.3.3 Key Definitions

For the purpose of this policy the following definitions apply:

Adult at Risk	As defined in the Care Act 2014 and the Social Services and Wellbeing (Wales) Act 2014, an adult at risk is an individual aged 18 years and over who: - has needs for care and support (whether or not the local authority is meeting any of those needs) and; - is experiencing, or at risk of, abuse or neglect, and;
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	as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.
Abuse & Neglect	Abuse is the violation of an individual's human and civil rights by any other person or persons. The abuse can vary from treating someone with disrespect in a way which significantly affects the persons enjoyment of life, to causing actual physical suffering. Neglect is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of a person's health or development. There are different types and patterns of abuse and neglect and different circumstances in which they may take place.
Safeguarding adults at Risk	Safeguarding of adults at risk refers to the protection of individuals aged 18 and over from abuse and neglect, ensuring their right to live safely and with dignity.
Historical abuse	Any disclosure or concerns that relate to abuse that happened more than a year ago. Whether it involves anyone working within or outside of the YHA it must still be taken seriously and acted upon in line with the procedures in this document. Often victims of abuse take many years to come forward due to shame and a fear of being disbelieved, however the alleged perpetrator may remain a risk to others and therefore all non-recent historic allegations have to be examined. YHA will report such cases and concerns to the local authorities and/or the police.
Safeguarding Adults Boards (SABs)	In England, Adult Safeguarding Boards (SABs) are responsible for coordinating safeguarding efforts to protect vulnerable adults from abuse, neglect, and exploitation. They work closely with statutory and non-statutory organizations, including local authorities, the police, and healthcare providers, to ensure adults at risk are safeguarded effectively. In Wales, Regional Safeguarding Boards operate under the Social Services and Well-being (Wales) Act 2014 and are responsible for identifying appropriate, confident, qualified, and experienced trainers to provide learning programs. They also meet their legislative responsibilities under the Social Services and Well-being Act (Wales) 2014.
Third Parties	External organisations contracted by YHA to provide services on site (e.g. activity providers or contractors).
Designated Safeguarding Lead (DSL) / Deputies	The appropriate and named individual responsible for overseeing proper adherence to safeguarding policies and procedures and responsible for the management of concerns in line with local and national procedures. The team of Regional Safety Managers deputise the role of DSL at YHA to adequately cover the wide remit.

1.4 Principals of Safeguarding Adults at Risk in England and Wales

The Care Act 2014 (England) and the Social Services and Wellbeing (Wales) Act 2014 defines safeguarding as protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including,

working in a person-centred way and having regard to their views, wishes, feelings and beliefs in deciding on any action.

Although not every adult accessing our programmes and activities will be considered an Adult at Risk, we recognise our responsibility to promote the wellbeing and safety of all programme participants and are committed to fostering a supportive culture, proactively seeking to support our participants on a person-centred basis and responding appropriately to any challenges they may face. This will be done appropriately and proportionately, and may include signposting participants to reputable support services, or working with the adult to make a referral to statutory agencies where a concern is significant.

Examples of issues which may negatively impact adults and place them at risk of harm may include, but are not limited to:

- Poor mental health
- Illness/poor health/long term medical conditions
- Impairments or disabilities (including physical/learning/sensory issues)
- Low income/financial difficulties
- Social isolation
- Limited access to services (including health, education etc.)
- Age
- Deprivation
- Drug or Alcohol Misuse
- Homelessness
- Seeking asylum / refuge

The two Acts define the principles of safeguarding adults at risk in both England and Wales:

The Care Act 2014 (England)		The Social Services and Well-being (Wales) Act 2024	
1	Empowerment – Adults are to be supported and encouraged to make their own decisions and informed consent.	1	Voice and control – ensuring the needs of the individual are at the centre of their care, giving them voice and control over the outcomes that will help them achieve well-being.
2	Prevention – Acting before harm occurs.	2	Prevention and early intervention – accessing advice and support at an early stage. This helps people maintain a good quality of life and reduces or delays the need for long term care.
3	Proportionality – The least intrusive response to the risk presented.	3	Well-being – supporting people to achieve well-being in all aspects of their lives.

4	Protection – Support and representation for those in greatest need.	4	Co-production – involving people in deciding what support and services they need and recognising their expertise.
5	Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.	5	Multi agency – strong partnership working between all agencies is essential to improve the well-being of people and carers in need of support.
6	Accountability – Accountability and transparency in delivering safeguarding.		

We are committed to upholding these principles in our interactions with adults and adults at risk, and in the event a safeguarding concern arises.

Abuse & Neglect of Adults at Risk

We recognise that **the vulnerabilities of adults and adults at risk differ from those of children and young people**, however, the definitions of abuse and neglect remain the same.

Abuse is the violation of an individual's human and civil rights by any other person or persons. The abuse can vary from treating someone with disrespect in a way which significantly affects the persons enjoyment of life, to causing actual physical suffering.

Neglect is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of a person's health or development.

There are different types and patterns of abuse and neglect and different circumstances in which they may take place.

The Care Act 2014 (England) and the Social Work and Wellbeing (Wales) Act 2014 both recognise the following categories of harm to adults at risk:

- Physical
- Sexual
- Emotional or Psychological
- Neglect and acts of Omission
- Financial or Material

Wesh procedures recognise that all these forms of abuse can take place in different contexts, such as domestic abuse, modern slavery, institutional abuse, and so on. The act therefore does not define these as standalone categories of harm in the same way that the Care Act 2014 (England) does.

The Care Act 2014 (England) also recognise a further 5 categories of harm :

- Discriminatory
- Organisational or Institutional
- Self-neglect
- Domestic (including coercive control)
- Modern slavery

A full description of the indicators of each category of harm can be found in **3.2 Appendix 2**.

Despite the differences in each nation's acts, YHA are prepared to recognise any type of harm or risk faced by adults engaging with our services and activities, and respond appropriately. **For sites and visitors in Wales**, this includes following the [Working Together to Safeguard People: Code of Safeguarding Practice](#), which clearly states that all organisations (including community organisations) have a duty to report all safeguarding concerns to the relevant local authority.

Adults may be vulnerable to abuse, harm, or exploitation through their relationships and interactions both within and beyond the wider community. The organisation's safeguarding responsibilities are not confined to incidents that occur on YHA premises. This duty also extends to responding appropriately to disclosures, allegations, or concerns that an adult may be experiencing abuse or neglect in any setting

1.5 Responding to a Concern or Disclosure

Employees and volunteers working within the YHA network are prepared to recognise and respond to safeguarding and welfare concerns arising in a number of different ways through continuous learning and development tailored to their role. The indicators of harm are highlighted via policy, training, reflection and learning from individual incidents and cases and through regular support sessions, including team meetings and one-to-one sessions. **An extensive list of the types of risks faced by adults at risk and the associated indicators can be found in 3.2 Appendix 2.**

Safeguarding and welfare issues are most commonly brought to the attention of YHA employees and volunteers through recognising these indicators, however, adults can at times disclose issues directly, and YHA is committed to ensuring all employees and volunteers are prepared to respond appropriately to support the individual in a person-centred way and achieve the best possible outcome.

Dos and Don'ts when responding to a disclosure:

Do	Don't
✓ Be accessible and receptive ✓ Listen carefully ✓ Take it seriously ✓ Reassure the person that they are right to tell you ✓ Say what will happen next ✓ Notify your hostel or line manager ✓ Make a careful record of what was said ✓ Where appropriate, signpost the individual to support services	✗ React strongly ✗ Jump to conclusions, especially about the abuser ✗ Speculate or accuse anybody ✗ Tell the person you will keep their secret ✗ Ask leading questions ✗ Make promises you cannot keep ✗ Stop a person who is speaking freely

Whether a disclosure has been made or an employee or volunteer has recognised a potential safeguarding or welfare issue in any other way, they must report to their hostel manager or line

manager immediately and make a record of the concern at the earliest possible opportunity. Where the concern is of a serious nature, or where advice is needed, the hostel manager or line manager will seek support from a DSL immediately.

1. Respond

Take appropriate and immediate action if the individual requires urgent medical attention or protection (call 999 for the relevant emergency service).

Where appropriate, signpost the individual to relevant support services.

2. Report

Notify the hostel manager or line manager as priority. Where the hostel manager or line manager is unavailable, notify the individual in charge.

The hostel or line manager will seek advice from the operation manager or regional safety manager (Deputy DSL) as required.

3. Record

Collect information about the situation and make a thorough and accurate record. Records should include the date and time of the incident or disclosure, parties who were involved, what was said or done and by whom and any further actions taken.

All concerns, whether minor or significant will be recorded on an OSHENS safeguarding form at the earliest possible convenience, and before the end of the shift.

Where further action is taken by either hostel staff or the regional safety manager (Deputy DSL) the record will be update as appropriate.

4. Refer

The regional safety manager (Deputy DSL) will consider the appropriate action to take, taking the following into account:

- The individual's wishes and preferred outcome.
- The safety or wellbeing of other young people or adults with care and support needs.
- Whether an employee, volunteer or third party is involved.
- Whether a crime has been committed.
- Whether the concern meets the threshold for the intervention of Local Authorities.
- Whether the concerns are about an adult at risk living in Wales or Northern Ireland (where there is a duty to report to the Local Authority).

The regional safety manager (Deputy DSL) will use their expertise and experience to decide upon the relevant action to take to achieve the best possible outcome for the adult, consulting with the DSL as appropriate. Actions decided upon can range from assisting hostel staff to signpost the individual to the appropriate support services in the case of more minor events, to making a referral to their Local Authority and/or other statutory agencies such as the police in the event of more significant concerns.

1.6 Recording Keeping & Information Sharing

YHA recognise that information about concerns of abuse include personal data and comply with the Data Protection Act (DPA) and the General Data Protection Regulations (GDPR) when collecting, recording, storing, and sharing information.

We recognise that Data Protection legislation does not prevent information sharing, but does ensure that personal information is only shared appropriately. This legislation allows information sharing within an organisation. For example:

- Anyone who has a concern about harm can make a report to an appropriate person within the same organisation.
- Case management meetings can take place to agree to co-ordinate actions by the organisation.

Where records of a safeguarding concern relating to an adult are kept, they are done so thoroughly and accurately, and stored confidentially with access only to those who require it. Information relating to the safeguarding of an adult is only shared with the relevant authorities, where it meets the criteria for referral, and/or where the adult consents to it being shared.

The adult may not always want information to be shared. Their wishes should be respected unless there are over-riding reasons for sharing information, such as:

- it is not safe to contact the adult to gain their consent – i.e. it might put them or the person making contact at further risk.
- you believe they or someone else is at risk, including children.
- you believe the adult is being coerced or is under duress.
- it is necessary to contact the police to prevent a crime, or to report that a serious crime has been committed.
- the adult does not have mental capacity to consent to information being shared about them.
- the person causing harm has care and support needs.
- **the concerns are about an adult at risk living in Wales or Northern Ireland (where there is a statutory duty to report concerns about an adult to the Local Authority).**

When information is shared without the consent of the adult this must be explained to them, when it is safe to do so, and any further actions should still fully include them.

Information will only be shared with family and/or carers with the consent of the adult or if the adult does not have capacity to make that decision and family/carers need to know to help keep the person safe.

Where there is a safeguarding concern relating to an adult, a Deputy DSL must be notified. Even when the adult has expressed that they do not wish for the information to be shared with anyone else.

If there is any doubt as to whether we should share information, we will consult with appropriate organisations for advice.

Any decision to share or not to share information with an external person or organisation will be recorded together with the reasons to share or not share information.

Where the concern meets the criteria above for referral to the local authority, the DSL will formally notify the Adult Social Services Team and, where a crime has or may have been committed, the police.

Where an allegation has been made about the conduct of an employee or volunteer, the DSL will follow the procedure for managing allegations, outlined in 2.2 Employee Conduct and Managing Poor Practice or Allegations. **For employees and volunteers working in Wales, this may include a referral to the Local Authority Designated Officer (LADO).**

1.7 Compliance (England and Wales)

Legislation for the safeguarding of adults at risk in England and Wales is compliant with United Nations directives on the rights of disabled people and commitments to the rights of older people. It is covered by:

- The Human Rights Act 1998
- The Data Protection Act 2018
- General Data Protection Regulations 2018

The practices and procedures within this policy are based on the relevant legislation and government guidance.

- The Care Act 2014
- Social Services and Well-being (Wales) Act 2014
- Working Together to Safeguard People: Code of Safeguarding Practice (Wales)
- The Mental Capacity Act 2005

1.8 Ownership and Authority

This policy has been authorised by the Designated Safeguarding Lead who is the owner of this policy.

1.8.1. Accountabilities

The Safeguarding Policy is ultimately the responsibility of the Designated Safeguarding Lead in conjunction with the Safeguarding Panel, Executive Director responsible for Safeguarding and the Board of Trustees.

All employees, relevant volunteers, franchise hostels and managers of all business functions are required to comply with this Safeguarding Policy.

1.8.2 Managing Policy Breaches

YHA is committed to taking all appropriate action, including disciplinary, legal or other action in response to any breaches of its safeguarding policy and procedures.

It is the responsibility of our employees and volunteers to act if there is a cause for concern about a child or adult at risk, or the behaviour of an adult towards a child or adult at risk, but it is not their responsibility to determine if abuse has occurred or what action is required to protect them.

Responsibility for deciding whether to escalate a concern to the appropriate authority lies with the Designated Safeguarding Lead in conjunction with the Safeguarding Panel, Executive Director responsible for Safeguarding and the Board of Trustees.

1.9 Policy Review

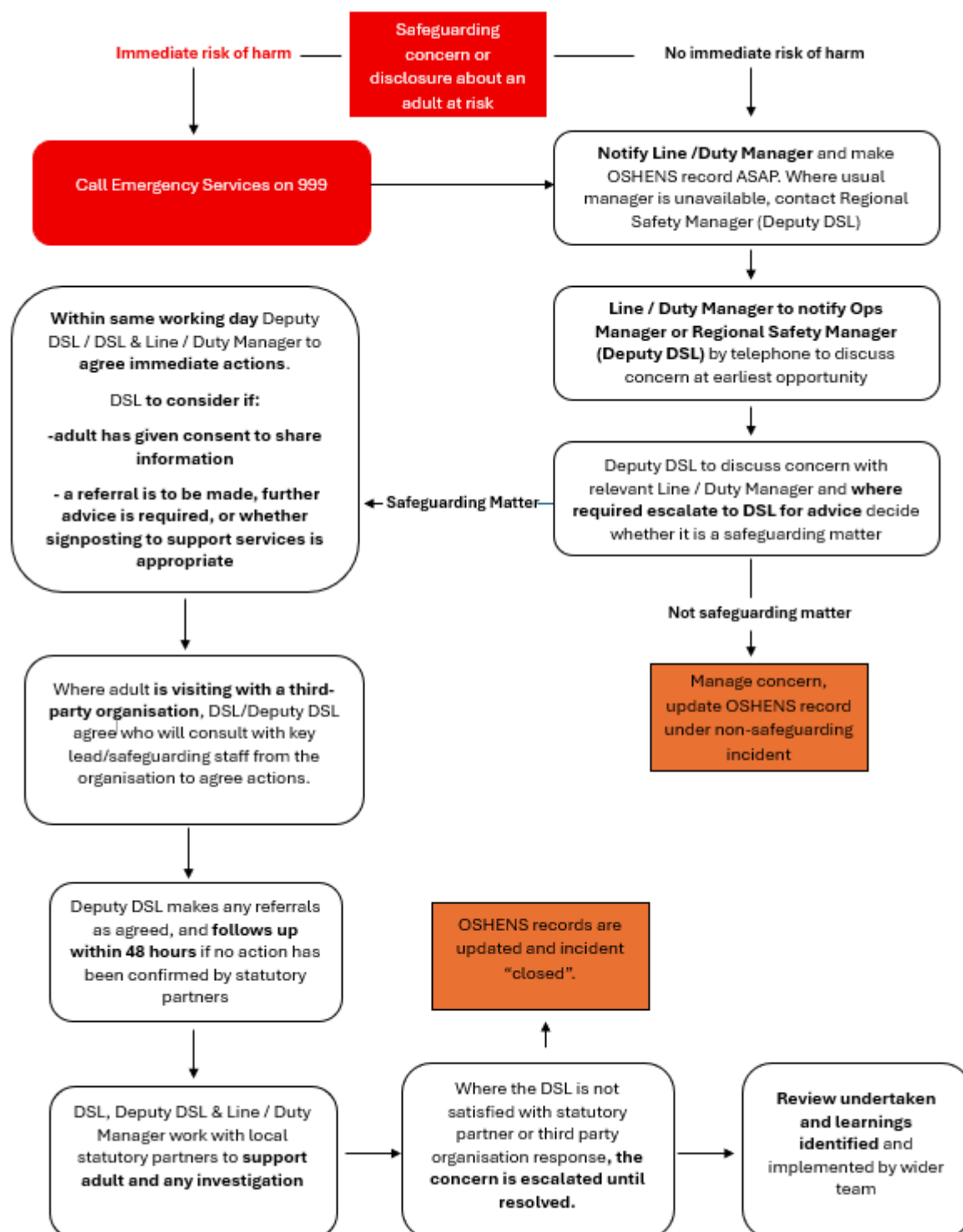
This policy and the associated procedures is endorsed by the YHA Board of Trustees. The policy will be reviewed annually as a minimum, and more frequently as appropriate. A review will be triggered where lessons are learned from individual incidents or cases, and where legislation, guidance (statutory or non-statutory) and best practice evolves throughout England and Wales as part of our commitment to continual improvement.



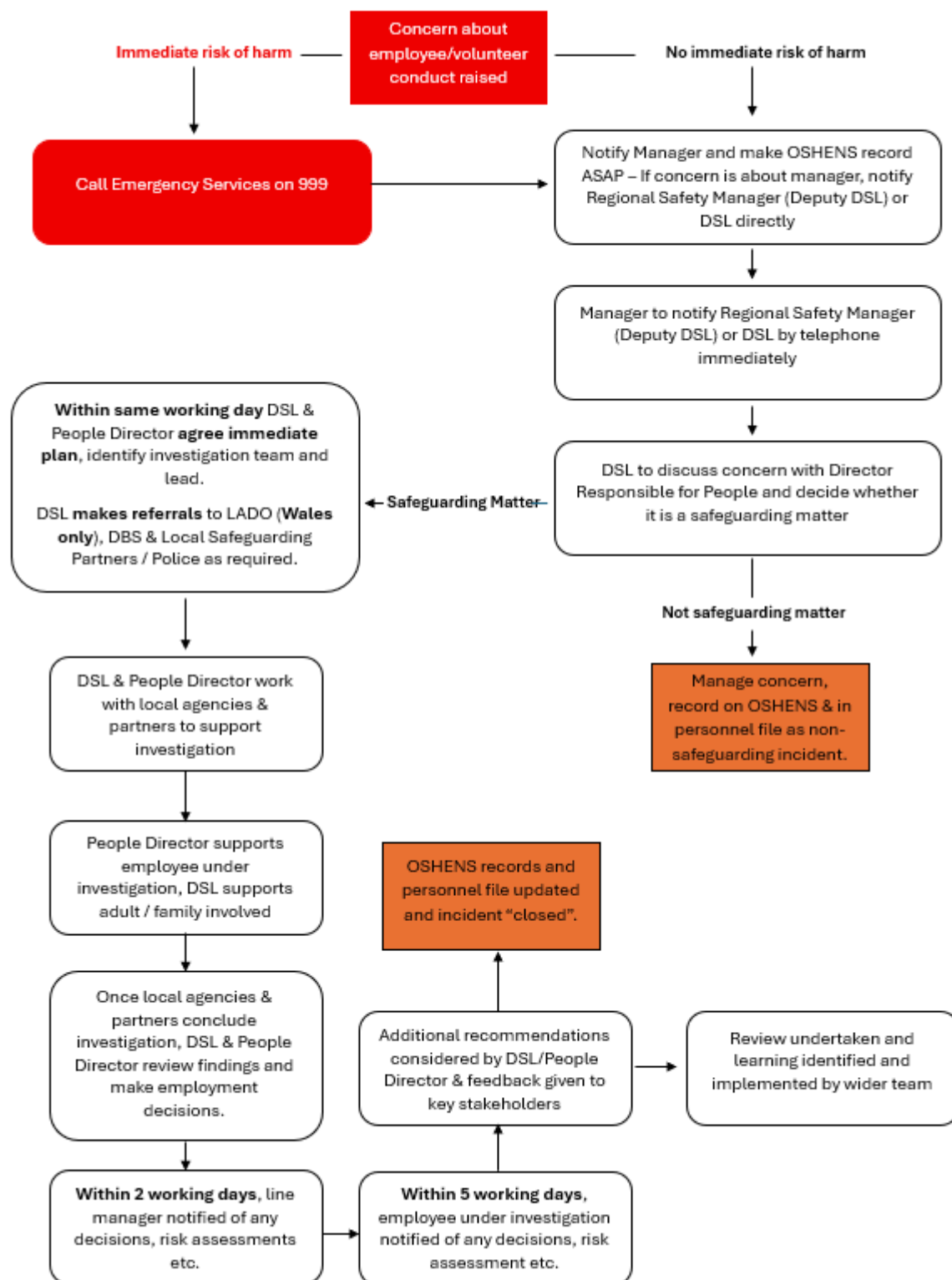
James Blake – Chief Executive Officer for YHA – February 2026

Part 2 – Safeguarding Procedures

2.1 Managing a Safeguarding Concern or Disclosure about an Adult at Risk



2.2 Employee Conduct and Managing Poor Practice or Allegations



YHA operates robust policies and procedures for the safer recruitment, vetting and onboarding of employees and volunteers. These extend to the way employees and volunteers are supervised, supported and managed throughout their time with the organisation.

Expectations relating to employee and volunteer behaviour and conduct are clearly defined in the **3.3 Appendix 3 -YHA Employee and Volunteer Code of Conduct** The experience, safety and welfare of children, young people and adults engaging in YHA services and activities is paramount, and all employees and volunteers are held to the highest standards.

Onboarding processes such as induction, mandatory safeguarding training, and role-specific education, together with workforce management procedures (including regular team meetings, supervision, and one-to-one appraisals) ensure that there is an ongoing focus on safeguarding, organisational culture, and best practice. Employees and volunteers are encouraged and expected to challenge poor practice at any point.

YHA operate a formal process for managing allegations and poor practice, including where concerns arise about employees and volunteers associated with third-parties, sub-contractors and site visitors responsible for groups of children and adults at risk.

2.2.1 Allegations and Poor Practice

An **allegation** is any information which suggests that an employee, volunteer, or person acting on behalf of YHA may have:

- Behaved in a way that has harmed, or may have harmed, an adult at risk;
- Behaved in a way that indicates they may pose a risk of harm to adults with care and support needs;
- Behaved in a way that calls into question their suitability to work with adults or children in regulated activity;
- Committed a criminal offence against or related to an adult at risk.

Poor practice refers to behaviour that falls below the expected standards set out in the YHA Employee and Volunteer Code of Conduct, but does not necessarily meet the threshold of abuse or neglect. Examples include:

- Failing to respect an adult's dignity, privacy or choice;
- Using inappropriate language or behaviour, even where no harm is intended;
- Not following agreed policies, procedures, or care/support plans;
- Neglecting professional boundaries, such as over-familiarity or favouritism;
- Inconsistencies in supervision, record-keeping, or professional standards.

Both allegations and poor practice must always be taken seriously. Even where a concern does not meet the statutory threshold for a safeguarding referral, it must be addressed through appropriate management action, training, or supervision. Where concerns do meet the threshold, YHA will report them without delay to the relevant **Local Authority Safeguarding Adults Board** (England), or

in Wales, in line with the statutory **duty to report** under the **Social Services and Well-being (Wales) Act 2014** and the **Wales Safeguarding Procedures (2019)**.

2.2.2 Additional Requirements in Wales

Where employees, volunteers or visitors (adults) are living or working in Wales, YHA will comply fully with the **Social Services and Well-being (Wales) Act 2014** and the **Wales Safeguarding Procedures (2019)**. This includes the statutory **duty to report** where there is reasonable cause to suspect that an adult is at risk of abuse, neglect, or harm.

All concerns relating to the conduct of a YHA employee, volunteer or other adult acting on behalf of YHA will be reported to the relevant **Local Authority Designated Officer (LADO)** in line with Welsh guidance.

Where there is an immediate risk of harm, the matter will also be reported to the **Police (999 in an emergency)**.

Referrals to the **DBS** will be made where an individual is removed from regulated activity due to safeguarding concerns.

2.3 Partnership and Multi-Agency Working

YHA recognise there may be a need to cooperate with the Local Authority and the Police in the event of a concerns and are prepared to:

- Provide further information or details relating to a concern or individual.
- Provide a safe place for the adult to meet with other professionals e.g. Police/Social Workers/Advocates.
- Attend safeguarding meetings.
- Coordinate internal investigations (e.g. complaints, disciplinary) with investigations by the police or other agencies.
- Share information about the outcomes of internal investigations.
- Provide a safe environment for the adult to continue their activity/ their role in the organisation.

2.4 Safeguarding Requirements for Third Parties and Sub-Contractors

2.4.1 Third Party Services (Activity Providers)

YHA regularly contracts with third party organisations to provide services on site (e.g. activity providers) and we are committed to our responsibilities to ensure that those who work with, or for us, can deliver safe and quality services and have robust safeguarding arrangements in place. To achieve this, we outline our expectations and agree terms within a formal contract or Service Level Agreement. As a minimum, we expect that all third party services operate:

- A safeguarding policy and reporting procedures

- A safer recruitment policy and procedures
- A policy and procedure for managing low-level concerns and allegations of poor practice / abuse
- Safer working practice procedures, outlining their expectations of employees and volunteers working for them. This is to include a code of conduct and stance on safe supervision ratios and lone working arrangements
- A formal procedure for conducting safeguarding Inductions and ongoing training
- Risk assessment procedures for activities and supporting individual participant needs

Responsibility for ensuring these requirements have been shared with third party activity providers, and that assurances are in provided by a person with relevant authority rests with the Director of Operations and Impact. Responsibility for other service providers resides with the department or team commissioning the service.

2.4.2 Third Party Visitors (Community and Residential Groups)

A significant number of guests visit YHA as part of residentials, educational trips, and other organised activities arranged by third parties such community organisations and residential homes.

YHA is committed to maintaining the highest standards of safety for everyone staying on our sites, including the safeguarding and welfare of adults at risk. However, where adults at risk are visiting as part of a group organised and supervised by another organisation, **the safeguarding and supervision of those adults at risk remains the full responsibility of the visiting organisation** at all times.

To support safe and positive experiences for all guests, YHA sets out clear safeguarding expectations as part of our booking arrangements and, where relevant, within formal contracts or Service Level Agreements. Visiting organisations are expected to operate and uphold the following as a minimum standard:

- A safeguarding policy and reporting procedure, including arrangements for managing concerns
- Safer recruitment policy and procedures
- A procedure for managing low-level concerns and allegations of poor practice or abuse
- Safer working practice guidance, including a code of conduct, supervision ratios, and lone working expectations
- Safeguarding induction and ongoing training for all accompanying adults
- Risk assessments for activities and for individual participant needs
- A mechanism for collecting and holding parental/carers consent, emergency contact and medical information
- Appropriate supervision arrangements at all times during travel, overnight stays, and on-site activity
- An information-sharing agreement with YHA to ensure relevant safety information is provided prior to arrival

YHA expects visiting organisations to conduct their own due diligence and to take full responsibility for ensuring their staff and volunteers understand and follow these arrangements.

YHA reserves the right to request evidence of safeguarding documentation where it is deemed necessary to support the safety of visitors and may refuse or withdraw bookings if appropriate standards are not met or assurances cannot be provided.

YHA receives bookings through **Travel Trade Partners for groups visiting from the UK and overseas**. These requirements are shared with Travel Trade Partners and must be adhered to and incorporated into the Partner's own booking processes. YHA reserves the right to refuse or cease accepting bookings from a Partner where safety concerns are identified.

2.4.3 Responsibilities Summary Table

Area of Responsibility	YHA	Visiting Organisation (e.g. Community Group, Residential Home)
Overall Safeguarding Responsibility	Maintains a safe environment and upholds safeguarding standards on site.	Holds full safeguarding responsibility for adults at risk and staff within their group.
Policies & Procedures	Ensures YHA policies and expectations are communicated.	Ensures robust safeguarding, safer recruitment, and conduct policies are in place and followed.
Supervision	Provides safe accommodation and oversight of YHA staff.	Provides active supervision of adults at risk at all times, including overnight.
Room & Bed Allocation	Allocates beds safely and reserves right to refuse unsafe arrangements.	Ensures adults at risk are placed safely in rooms, following their own safeguarding and consent processes.
Information Sharing	Requests relevant information to support site safety.	Provides required participant, medical, and emergency contact details prior to arrival.
Incident Reporting	Manages and reports any site-related incidents involving YHA staff or environment.	Manages and reports any incidents involving their group, and informs YHA of any serious occurrences during the stay.
Training & Induction	Ensures YHA staff complete safeguarding training.	Ensures all accompanying adults are trained and briefed in their safeguarding responsibilities.

2.4.4 Subcontractors and Visiting Workers

From time to time, YHA engages subcontractors and other visiting workers to undertake work at our sites, such as maintenance, building, cleaning, catering, or specialist consultancy. While these individuals and organisations are not directly responsible for guest supervision, YHA recognises its duty to ensure that anyone working on our premises upholds our standards of safety and conduct.

To achieve this, we require that all subcontractors and visiting workers:

- Are engaged through approved procurement or commissioning processes that include **appropriate due diligence and vetting checks**, proportionate to the nature of the work being carried out.
- Have read and agreed to comply with YHA's **Safeguarding Policy, Code of Conduct**, and **Health and Safety procedures** prior to beginning work on site.
- Are supervised by YHA staff or an appointed responsible person where work takes place in operational areas of a hostel, or where children or vulnerable adults may be present.
- Wear visible identification at all times while on site.
- Report any safeguarding, health and safety, or security concerns immediately to the Duty Manager or Site Manager.

Where subcontractors are engaged by a third-party provider (for example, as part of a larger works contract), YHA expects the lead contractor to ensure that:

- All personnel deployed to YHA sites have undergone **relevant background and identity checks**.
- Safeguarding and Health & Safety expectations are clearly communicated and contractually binding.
- A designated point of contact is provided for YHA to raise concerns or request information regarding compliance.

YHA reserves the right to request evidence of vetting and training, to restrict access to certain areas, or to remove any subcontractor from site where safety, conduct, or safeguarding standards are not met.

2.5 Reasonable Adjustments & Inclusion

Where adults at risk are participating in any YHA programme, activity or event, it is the responsibility of the organisation delivering the activity including third-party providers to carry out a person-centred assessment of needs. This assessment should identify and implement any reasonable adjustments to activities, the environment, or staffing to support safe and meaningful participation. Adjustments may include individual support plans, personal risk assessments, bespoke equipment, or consideration of venue suitability. Relevant medical or support information may be requested from the adult at risk or their carers and will be handled in line with data protection best practice. Providers can refer to YHA's Inclusion Policy for guidance on facilitating inclusion and participation.

Part 3 – Appendices

3.1 Appendix 1 - Key Contacts & Useful Resources

Name & Title	Safeguarding Role	Contact details
Jane Price Executive Director of Income, Impact, Operation & People	Executive Director responsible for Safeguarding	07850515050
Nicky Smith Head of Health, Safety & Compliance (HOHSC)	Designated Safeguarding Lead (DSL)	07977 635663
Will Brown Regional Safety Manager	Deputy DSL	07841341908
Nicola Baker Regional Safety Manager	Designated Safeguarding Officer (DSO)	07966 903212
Out of Hours H+S Support – Weekends and 18.00 - 08.00 Monday - Friday		01629 702483
YHA Whistleblowing Helpline	Confidential reporting route for staff to raise concerns about wrongdoing, unsafe practice, or breaches of policy within the organisation, without fear of reprisal.	0800 915 1571 www.safecall.co.uk/report
External Agencies		
Safeguarding Adults Boards England & Wales	Report concerns of an Adult at risk of being abused or neglected in England.	Access local authority database here.
NSPCC Whistleblowing Helpline	Advice can be sought from NSPCC if using the YHA whistleblowing procedure has not resolved the concern	0800 028 0285
Supportline	Helpline for people who are isolated, experiencing or at risk of abuse. Only open Tuesdays, Wednesdays or Thursdays 6pm- 8pm.	01708 765200 info@supportline.org.uk
Internet Watch Foundation	Investigates and removes images of child sexual abuse content and criminally obscene content online. Can be used to report concerns.	Report here.
Samaritans	24 hours a day helpline for mental health concerns. www.samaritans.org.uk	116 123
National Domestic Violence Helpline.	24 hours a day helpline. For survivors, friends and families and professionals in contact with DV survivors	0808 2000 247

Salvation Army	24 hours a day – referrals and advice for modern slavery and human trafficking.	0300 3038151
Modern Slavery National Helpline	24 hours a day – advice for modern slavery and human trafficking.	08000 121 700 File a report
Hourglass	To discuss concerns and get advice for older people who are at risk of, experiencing or recovering from any form of abuse or neglect.	0808 808 8141 helpline@wearehourglass.org
Metropolitan Police Anti-Terrorism Hotline	If you're suspicious of something that could identify a terrorist threat anywhere in the UK, report it online or call the Anti-Terrorism Hotline.	0800 789 321 online tool to report possible terrorist activity
Karma Nirvana	Support for victims of Honour Based Violence or Forced Marriage.	0800 5 999 247 www.karmanirvana.org
Hub of Hope	The UK's largest mental health support directory.	www.hubofhope.co.uk
National FGM centre	Resources and training for organisations, and signposting support for those who have undergone female genital mutilation.	www.nationalfgmcentre.co.uk
Disclosure & Barring Service (DBS)	Advice line for criminal records checks & to make barring referrals.	03000 200 190
The Charity Commission	The regulator for charities in England and Wales.	Make a notification here .

3.2 Appendix 2 – Definitions and Indicators of Harm for Adults at Risk

Key acts of legislation in **England and Wales** define specific categories of harm that pose a risk to adults. All YHA employees and volunteers are trained to recognise the signs and indicators of these categories of harm and respond appropriately.

In instances where adults may benefit from the support of specialist agencies to prevent minor concerns from escalating into harm, we encourage employees and volunteers to use signposting appropriately.

The definitions of harm and their associated indicators have been adapted from the Care Act 2014 (England) and the Social Work and Well-being (Wales) Act 2014.

The following **5 categories of harm are recognised by both acts**, although there are differences in how they are defined in each:

Physical Abuse

Physical abuse involves the non-accidental infliction of physical harm or injury on an adult at risk. This may include assault, hitting, slapping, pushing, misuse of medication, inappropriate restraint, or unlawful deprivation of liberty.

Possible indicators include:

- Unexplained injuries, bruising, burns, or fractures
- Injuries at different stages of healing
- Fear of physical contact or flinching when approached
- Deterioration in health without clinical explanation
- Signs of restraint, such as marks on wrists or ankles
- Reluctance to be examined or receive medical treatment
- A carer's refusal to allow access to the adult alone

Relevant support:

- Seek immediate medical attention where required
- Raise safeguarding concerns through the Local Authority Safeguarding Adults process
- Contact the police if a crime is suspected (**999** in emergencies)
- **Hourglass (0808 808 8141)** provides confidential support to older people experiencing or at risk of abuse
- Independent advocacy may be provided under the Care Act 2014 and Social Services and Well-being (Wales) Act 2014 to support the adult in safeguarding processes

Sexual Abuse

Definition:

Sexual abuse involves an adult at risk experiencing sexual activity without consent, or where consent has been coerced or manipulated. It includes rape, indecent exposure, sexual harassment,

inappropriate looking or touching, sexual photography, sexual acts to which the adult has not consented or was pressured into consenting, or where the adult lacked capacity to consent.

Possible indicators include:

- Unexplained injuries to intimate areas
- Difficulty walking or sitting
- Sudden changes in behaviour, withdrawal, or anxiety
- Reluctance to be left alone with particular individuals
- Sexually transmitted infections, pregnancy, or urinary infections without clear cause
- Inappropriate or unusual sexualised behaviour or language
- Torn, stained, or bloody underclothing

Relevant support:

- Immediate safeguarding referral to the Local Authority
- Contact police in all cases of suspected sexual assault (**999** in emergencies)
- **Rape Crisis England & Wales (0808 500 2222)** offers free, confidential support to survivors
- **Survivors UK (0203 598 3898)** provides support to male survivors of sexual violence
- Independent Sexual Violence Advisers (ISVAs) can support adults through the criminal justice process

Emotional or Psychological Abuse

Definition:

Emotional or psychological abuse is the use of threats, humiliation, bullying, control, intimidation, or other verbal/non-verbal behaviour to cause emotional distress, undermine self-esteem, or erode autonomy. It may also include isolation from family, friends, or community.

Possible indicators include:

- Low self-esteem or self-worth
- Withdrawal, anxiety, or depression
- Difficulty forming or maintaining relationships
- Fearfulness around certain individuals
- Changes in eating or sleeping patterns
- Reluctance to engage in decision-making or activities
- Reports of being shouted at, ridiculed, or controlled

Relevant support:

- **National Domestic Abuse Helpline (0808 2000 247)** – 24/7 confidential support provided by Refuge
- **Mind (0300 123 3393)** for mental health advice and support
- **Samaritans (116 123)** for free emotional support to anyone in distress
- Independent advocacy to support decision-making and rights under the Care Act and Social Services and Well-being Act

Neglect or Acts of Omission

Definition:

Neglect is the persistent failure to meet an adult's basic needs, either by ignoring or disregarding physical, emotional, or medical needs. It includes withholding access to adequate food, shelter, clothing, heating, personal or medical care, assistance with daily living, or denying access to services.

Possible indicators include:

- Malnutrition, dehydration, or weight loss without medical cause
- Poor personal hygiene, untreated medical conditions, pressure ulcers
- Unsafe or hazardous living environment
- Inappropriate clothing for weather conditions
- Missed medical appointments or lack of access to medication
- Carers failing to meet essential needs despite resources being available

Relevant support:

- **Age UK Advice Line (0800 678 1602)** for older people at risk of neglect
- **Carers UK (0808 808 7777)** offers advice and support for carers struggling to meet needs
- Local **Healthwatch services** can help raise concerns about health or social care provision

Financial or Material Abuse

Definition:

Financial or material abuse involves the unauthorised, improper, or fraudulent use of an adult's funds, property, or resources. This may include theft, fraud, exploitation, undue pressure in connection with wills, property, inheritance or financial transactions, or misuse of benefits or allowances.

Possible indicators include:

- Unexplained loss of money or possessions
- Sudden inability to pay bills or afford essentials
- Reluctance to discuss financial matters or secrecy around finances
- Sudden changes to wills, deeds, or financial documents
- Lack of basic amenities despite adequate income
- Unexplained withdrawal of large sums of money
- An individual expressing concern about pressure to give money or possessions

Relevant support:

- Police referral where theft, fraud, or exploitation is suspected (**Action Fraud: 0300 123 2040**)
- **Hourglass (0808 808 8141)** for concerns about elder financial abuse
- **Citizens Advice (0800 144 8848)** for debt, consumer, and money advice
- **Office of the Public Guardian (OPG)** for concerns about misuse of power of attorney or deputyship

The Procedures recognise that all these forms of abuse can take place in different contexts, such as domestic abuse, modern slavery, institutional abuse, and so on.

The further 5 categories of harm are recognised by the Care Act 2014 (England):

Self-Neglect

Self-neglect encompasses a broad spectrum of behaviours in which an individual fails to adequately care for their own personal hygiene, health, or living environment.

There are generally two recognised forms of self-neglect:

- **Active (Intentional) Self-Neglect:** Where an individual makes a conscious decision not to attend to their basic needs. For example, a person may deliberately refuse medical assistance when unwell.
- **Passive (Non-Intentional) Self-Neglect:** Where physical or mental health conditions contribute to the neglect of personal needs. For example, someone with a learning disability may unintentionally neglect hygiene routines due to lapses in concentration or memory.

Possible indicators of self-neglect may include:

- Poor personal hygiene and unkempt appearance
- Malnutrition and/or dehydration
- Lack of adequate food, clothing or shelter
- Living in unsafe, unsanitary, or squalid conditions
- Hoarding behaviours, including animal hoarding in inappropriate environments
- Neglect of household maintenance
- Non-compliance with health or care services
- Inability or unwillingness to take prescribed medication or manage illness/injury

Domestic Violence and Abuse

Domestic abuse is defined by *Women's Aid* as:

“An incident, or pattern of incidents, of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer.”

It also encompasses so-called “*honour-based violence*”.

Forms of domestic violence and abuse include:

- **Emotional** – e.g. belittling, isolating from support networks, controlling movements and contacts.
- **Threats and Intimidation** – e.g. threats of harm or death, stalking, harassment.
- **Physical** – e.g. assault, hitting, shoving, strangulation, throwing objects.
- **Sexual** – e.g. sexual assault, coercion into sexual activity, unwanted touching.
- **Financial** – e.g. restricting access to money, denying financial independence.
- **Coercive Control** – a sustained pattern of intimidation, threats, humiliation, and assault used to dominate and erode autonomy.

Research by *Public Health England (2015)* confirms that disabled people are disproportionately affected, experiencing abuse that is often more severe, more frequent, and of longer duration. Dynamics of abuse may include:

- Withholding or destroying medication or medical equipment
- Restricting access to personal care, meals, or communication
- Abuse by carers, including invasion of privacy

If you are concerned that someone is experiencing domestic abuse:

- The *National Domestic Abuse Helpline* is available 24/7 on **0808 2000 247**.
- In cases of immediate danger, always call **999**.

Modern Slavery

Modern slavery includes slavery, human trafficking, forced labour, and domestic servitude. Perpetrators exploit, coerce, or deceive individuals into conditions of abuse, servitude, and inhumane treatment.

The *Home Office (Modern Slavery: How the UK is Leading the Fight)* identifies contributory factors that increase vulnerability, such as poverty, lack of education, unemployment, political instability, economic disparity, and conflict.

Adults and children with learning disabilities may be at heightened risk due to social isolation, limited access to services, or being overlooked as low-profile concerns.

Possible indicators of modern slavery include:

- Signs of physical, emotional, or psychological abuse
- Malnourishment or poor personal hygiene
- Appearing withdrawn, fearful, or under control of others
- Living in overcrowded or substandard housing, often at same site as work
- Lack of identification documents or personal possessions
- Wearing the same clothes repeatedly
- Avoidance of eye contact, fear of authorities
- Reluctance to engage with others

Support is available:

- In emergencies, contact the police on **999**.
- The Modern Slavery Helpline operates 24/7: **08000 121 700**

Discriminatory Abuse

Discriminatory abuse involves harassment, slurs, or unfair treatment directed at an individual because of a characteristic that is legally protected under the *Equality Act 2010*.

Protected characteristics include:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

Discrimination may be:

- **Direct** – less favourable treatment based on a protected characteristic.
- **Indirect** – policies or practices that disadvantage a protected group.
- **Harassment** – unwanted behaviour that violates dignity or creates a hostile environment.
- **Victimisation** – unfair treatment for raising or supporting a complaint.

Possible indicators include:

- Withdrawal, isolation, or fearfulness
- Expressions of frustration, anger, or anxiety
- Lack of provision that reflects individual needs in relation to protected characteristics

Organisational (Institutional) Abuse

Organisational abuse refers to neglect or poor care practice within institutional settings (such as hospitals or care homes) or in domiciliary care. It can be the result of systemic failures in structures, policies, procedures, or culture. Abuse may occur as isolated incidents or as part of sustained ill-treatment.

Examples include:

- Misuse of power, authority, or control
- Inappropriate confinement or restraint
- Lack of choice in daily living (e.g. food, clothing, routines, environment)
- Failure to respect religious, cultural, or personal identity
- Financial exploitation
- Verbal, physical, or emotional abuse

Indicators of organisational abuse include:

- Unsafe, unhygienic, or overcrowded conditions
- Inflexible or rigid routines
- Lack of privacy, dignity, or autonomy
- Discouragement of visits or family involvement
- Evidence of neglect, unexplained injuries, or inappropriate restraint
- Infantilising treatment or arbitrary decision-making

Organisational abuse is often associated with:

- Inadequate training or supervision
- Poor management oversight and accountability
- Weak communication within teams
- A culture that tolerates or ignores poor practice

Concerns should be raised with the Care Quality Commission (CQC), who regulate and inspect services to ensure standards of safety and quality.

3.3 Appendix 3 - YHA Code of Conduct

(for employees and volunteers – Children, Adults, and Adults at Risk)

This Code of Conduct sets out the standards of behaviour expected from everyone working or volunteering with YHA. It exists to:

- Safeguard and protect all guests, particularly children and adults at risk.
- Create safe, respectful, and inclusive environments.
- Protect employees and volunteers from situations that could lead to misunderstandings or false allegations.

By following this Code, you help maintain the safety, reputation, and values of YHA.

General Principles

All employees and volunteers must:

- Treat all guests with dignity, fairness, and respect.
- Always maintain professional boundaries. Remember, **you are acting in a 'relationship of trust'** as defined within YHA's safeguarding policies.
- Act responsibly and avoid behaviour that could harm YHA's reputation.
- **Report concerns or disclosures about abuse or neglect to your line manager immediately**, including concerns of abuse, poor practice or inappropriate **behaviour relating to staff members or volunteers** working for YHA or any visiting organisation.
- Immediately report any concerns about the **poor conduct or inappropriate behaviour of guests**, including where there is a concern that their behaviour is causing harm, or a risk of harm to other guests, both inside or outside of their group.
- Report any **inappropriate or overly familiar behaviour from guests or staff/volunteers from visiting organisation** towards YHA staff or volunteers, to your line manager (e.g. giving gifts, asking for number, asking for a date etc.) without delay.
- Recognise that **safeguarding is everyone's responsibility** – both on and off duty.

Expected Standards of Behaviour

Respect and Inclusion

- Promote an environment that is safe, welcoming, and free from discrimination.
- Listen to and respect the wishes, choices, and feelings of children and adults, including adults at risk.
- Respect privacy and confidentiality, sharing information only when necessary to protect someone from harm.

Professional Relationships

- Keep **relationships with guests professional**. Avoid over-familiarity, gifts, or personal contact outside of work.
- **Avoid situations where you are alone with a guest** whenever possible. If unavoidable, ensure others are aware. Plan activities that involve more than one other adult present, or at least within sight of others. **1-2-1 working with a child is against YHA policy.**
- Be mindful that **guests (both children and adults) may develop inappropriate attachments**. If this happens, inform your manager immediately and respond in a way that protects dignity.
- **Report any concerning or boundary-crossing behaviour from guests** (e.g., gifts, personal contact requests, invitations).

Conduct and Behaviour

- Act as **positive role models in behaviour and appearance**, including when off duty on YHA premises. Ensure that any dangerous or otherwise unacceptable behaviour, including bullying by children, is challenged, addressed and reported
- **Avoid unnecessary physical contact**. If comfort or assistance is required, seek consent and ensure it is appropriate, respectful, and in view of others.
- **Challenge unacceptable behaviour** such as bullying, harassment, or discriminatory remarks.
- Only access or **move guest belongings** when absolutely necessary and in the presence of someone else or with others.
- **Respect guest and colleague privacy**. Do not search online or share personal information without a safeguarding or operational reason.
- To protect guests and employees from false accusation, **individual members of staff should generally not enter bedrooms when in use**. Room entry should be carried out in line with guidance HK001 How to Clean a bedroom.
- When bedrooms are in use, **employees must only enter unaccompanied in the case of medical emergency**.
- Employees who must enter bedrooms during the day **for cleaning/maintenance purposes may access any room after ensuring that it is unoccupied**.
- **In case of only one employee being available** to attend an alleged maintenance issue in a room (or other physical standards item), the employee should **politely ask the guest to vacate the room and wait in reception** wherever reasonable to do so until the issue can be resolved.
- Should an **emergency require access to a bedroom**, especially at night, an **employee of the same sex as that of the occupants of the room** should knock on the door first. If this is not possible, employees of the opposite sex should get assistance from another employee or other adult before entering.

Health, Safety, and Safeguarding

- Follow all **safeguarding procedures and risk assessments** for activities involving children and adults at risk.
- Record and **report incidents, disclosures, concerns, or allegations** without delay.
- **Never promise to keep information about harm confidential**.
- **Use social media responsibly**. Never post or share images, details, or opinions about guests or colleagues, or opinions which may be considered as extreme or against the principals of safeguarding.

Unacceptable Behaviour

It is **never acceptable** for YHA employees or volunteers to:

- **Abuse, neglect, exploit, or mistreat any guest or colleague.**
- **Engage in sexual or intimate relationships with guests**, in particular, children and adults at risk.
- Use offensive, **discriminatory, threatening, or sexually suggestive** language or gestures.
- Work or volunteer under the influence of alcohol or drugs.
- **Drink alcohol, smoke, or vape in non-designated areas**, or in ways that undermine professionalism.
- **Give or accept gifts, substances, or personal favours from guests.**
- Share **inappropriate personal information** or have intimate conversations with guests.
- **Take or post photographs of guests** without appropriate written consent.
- Invite or allow guests into **staff-only or private areas**.
- **Enter a bedroom, including shower spaces**, where you will then be alone with a child or children.
- **Assume responsibility for the discipline or ongoing management of children or young people's behaviour**, as this is the responsibility of the visiting organisation's group leader or line manager. YHA staff should avoid shouting at children and young people; raising your voice should only occur where it is necessary to gain immediate attention to prevent harm or respond to an emergency.
- **Play any audio and/or visual material** (CDs, DVDs, videos, photos, films, computer or games etc.) that has **inappropriate content for children**.
- **Use any job title or role**, at any level of the organisation, to **gain access to children** when not in the presence of a parent, teacher, guardian, group leader or carer.
- Meet or socialise with guests **outside of work duties**.
- **Steal or condone theft.**
- Allow or **encourage behaviour that supports extremism, radicalisation, or terrorism.**

Your Responsibility

Every employee and volunteer has a duty to:

- Act in line with this Code of Conduct.
- Report any breaches, concerns, or allegations immediately.
- Seek guidance from a manager if unsure how to act.

By working together, we create a safe, respectful, and positive environment for all children, adults, and adults at risk.

3.4 Appendix 4 – DSL & Deputy DSL Practical Guide

Responding to Safeguarding Concerns, Low-Level Concerns and Allegations

(Adults and Adults at Risk – England and Wales)

This appendix provides operational guidance for Designated Safeguarding Leads (DSLs) and Deputy DSLs when responding to safeguarding concerns raised by Hostel Managers, Operations Managers, staff, volunteers, or third parties.

This appendix should be read alongside the policy as a whole, and specifically:

- **Safeguarding Roles and Responsibilities at YHA** [see Section 1.3.2]
- **Principals of Safeguarding Adults and Adults at Risk England & Wales** [see Section 1.4]
- **Managing Allegations and Low-Level Concerns relating to staff and volunteers** [see Section 2.2]
- **Information Sharing and Record Keeping** [see Section 1.6]

1. Receiving a Safeguarding Concern About an Adult or Adult at Risk

(Concern raised by a Hostel Manager, Site Manager, staff member, volunteer, or third party)

Step 1: Receive and clarify the concern

- Listen carefully and remain calm and professional
- Clarify:
 - **Who** is involved – ask for identifiers such as full name, DOB and address (where possible) in case a referral is to be made
 - **What** has happened (facts only, no opinion)
 - **When and where** the concern occurred
 - **How** the concern came to light
- Do **not** investigate, ask leading questions, or promise confidentiality
- Ensure the concern is recorded in line with YHA procedures (e.g. OSHENS safeguarding form)
- **Consider whether the adult or adults at risk is part of a visiting group** and whether there is an appropriate group leader available to discuss concerns with or pass concerns on to.

Step 2: Consider immediate risk

Ask:

- Is the adult at **immediate risk of harm**?
- Is urgent medical or police intervention required?

If yes:

→ Has **999** been contacted?

→ Have site staff and / or group leaders taken reasonable steps to protect the individual?

→ Where Deputy DSL has taken the report, Inform the DSL as soon as practicable

If no:

→ Proceed to Step 3

Step 3: Visiting groups, support workers and group leaders

Where an adult is visiting YHA as part of an organised group and is accompanied by a support worker, carer or group leader, DSLs should consider:

- the adult's care and support needs and whether these are being appropriately met by the group
- whether the concern relates to the group's practice, oversight or support arrangements

Where appropriate and safe to do so, concerns may be:

- raised promptly with the group leader or support worker
- escalated within the group's own safeguarding arrangements

All actions and decisions must be clearly recorded on **OSHENS**.

Passing a concern to a group or support provider **does not remove YHA's safeguarding responsibility**. DSLs must retain oversight and be prepared to escalate where concerns are not managed appropriately or risk increases.

If the concern requires escalation or management from YHA, proceed to Step 4.

Step 4: Is this an Adult at Risk?

If Step 3 does not apply, and/or the concern requires escalation or management from YHA, consider whether the adult is an adult at risk under the following definitions:

England – Care Act 2014

An adult aged 18+ who:

- Has needs for care and support, **and**
- Is experiencing or at risk of abuse or neglect, **and**
- Is unable to protect themselves because of those needs

Wales – Social Services and Well-being (Wales) Act 2014

An adult aged 18+ who is experiencing or at risk of abuse or neglect
(*Care and support needs may be broader; apply a lower threshold*)

If unsure, **do not delay** – seek advice from the Local Authority.

Step 5: Consent and information sharing

- Establish the adult's wishes and preferred outcomes where safe to do so
- Explain what information may need to be shared and why
- Consent is **not required** where:
 - There is risk of serious harm
 - Others may be at risk (including children)
 - A crime has been or may be committed
 - The adult lacks capacity or is under coercion
 - There is a **statutory duty to report** (Wales)

Step 6: Referral decision (England and Wales)

England

Make a referral to the **Local Authority Adult Safeguarding Team** where:

- Care Act criteria are met, or
- Abuse or neglect is suspected, or
- Advice indicates referral is appropriate

Wales

- There is a **statutory duty to report** any concern where there is reasonable cause to suspect abuse, neglect or harm
- Report to the **Local Authority Adult Safeguarding Team without delay**
- Under the requirements and standards of the [Welsh Language Measure 2011](#), adults have the right to request information in the Welsh language. Where there is a request from an adult to understand what information has been shared with them in the Welsh language, the DSL team should liaise with the relevant local authority for advice and support to honour this request.

Contact the Police where a crime is suspected (999 in emergencies).

Step 7: Record, review and monitor

- Record:

- Decisions taken and rationale
- Advice sought
- Referrals made and outcomes
- Agree any internal actions or support required with YHA team
- Monitor ongoing risk and escalate where concerns persist

2. Receiving a Low-Level Concern or Allegation About a Staff Member or Volunteer

(Including YHA staff/volunteers and those from visiting partners or third parties)

Step 1: Determine the nature of the concern

[Ref: Managing Low-Level Concerns and Allegations – Section 2.2]

Is the concern:

- **A low-level concern / poor practice, or**
- **An allegation?**

If unclear → **treat as an allegation** until advice is obtained.

A. Low-Level Concerns (Poor Practice)

Examples include:

- Boundary issues or over-familiarity
- Inappropriate language or conduct
- Failure to follow safeguarding procedures
- Poor supervision or professional judgement

DSL / Deputy DSL actions

- Ensure the concern is recorded accurately
- Assess context, frequency, and impact
- Take proportionate action:
 - Advice or guidance
 - Supervision or training
 - Management action
- Monitor for patterns or escalation
- Escalate if thresholds are met

B. Allegations of Abuse or Risk of Harm

An allegation is where a person has:

- Harmed or may have harmed an adult at risk
- Behaved in a way that indicates they may pose a risk
- Behaved in a way that questions suitability to work with adults at risk
- Committed or may have committed a criminal offence

Step 2: Immediate safeguarding actions

- Consider:
 - Immediate risk to individuals
 - Temporary changes to duties
- Do **not**:
 - Investigate internally
 - Interview witnesses
 - Promise confidentiality

Step 3: External reporting (England and Wales)

The DSL should work with the Executive Director of Income, Impact, Operations and People to establish who will lead on the actions outlined below.

England

- Refer to **Local Authority Adult Social Care**
- Follow advice regarding:
 - Police involvement
 - Employer action
 - DBS or regulatory referrals

Wales

- **All allegations must be reported to the relevant local authority**
- Refer to:
 - Local Authority Adult Safeguarding Team
 - Allegations management process (LADO-equivalent)

- Contact Police where a crime is suspected

Step 4: Visiting partners and third parties

Where the concern relates to:

- Visiting group leaders
- Activity providers
- Contractors or partner organisations

The DSL must:

- Notify the employer organisation promptly
- Clarify lead responsibility with the Local Authority
- Ensure YHA safeguards its premises, staff, and guests
- Retain oversight of safeguarding actions on YHA sites

Step 5: Recording, oversight and reporting

- Maintain confidential, secure records
- Record advice, decisions, and actions
- Consider:
 - DBS referrals
 - Serious Incident reporting to the Charity Commission
- Ensure learning is captured through internal review processes

Out-of-Hours Guidance for DSLs and Deputies

Where a concern arises **outside normal working hours**:

- Immediate risk → **Call 999**
- Statutory safeguarding thresholds met:
 - Contact the **Local Authority Emergency Duty Team**
- Allegations involving potential criminal behaviour:
 - Contact Police as advised
- Record actions taken and decisions made
- Notify the DSL **at the earliest opportunity**
- Ensure follow-up actions are completed the next working day

Out-of-hours decisions must prioritise safety and should not be delayed pending internal consultation.