



Safeguarding Policy & Procedure

Ref:2WISH-POL-30

Support for those affected by sudden death
in young people



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Policy Statement and Purpose

2wish is committed to creating a safe, respectful environment and to preventing and responding to abuse, neglect or harm involving children and [DC1] adults who come into contact with our services. We recognise safeguarding as everyone's responsibility and will work in partnership with people, families and multi-agency partners to promote well-being and protect from harm.

(Wales: the Social Services and Well-being (Wales) Act 2014 Part 7 sets statutory safeguarding duties; England: Working Together to Safeguard Children 2026 and Care Act 2014 set duties for children and adults respectively.)

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Scope

This policy applies to all 2wish activities, across England and Wales, including in-person, telephone, online, home and community-based work, and partnership/commissioned activity.



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Legal and Practice Framework

Wales

- Social Services and Well-being (Wales) Act 2014 – Part 7 (Adults/Children at Risk, duty to report & enquire; Safeguarding Boards).
- Wales Safeguarding Procedures (children & adults) – digital procedures and practice pointers.

England

- Working Together to Safeguard Children (2026) – statutory multi-agency guidance.
- Care Act 2014 – adult safeguarding duties (s.42 enquiries, Safeguarding Adults Boards).

UK-wide/General

- Prevent Duty Guidance (2023) – duties to prevent radicalisation.
- Data Protection Act 2018/UK-GDPR – including Schedule 1 Part 2 para 18 (“safeguarding of children and individuals at risk”) and appropriate policy document requirements.
- Information sharing advice for safeguarding practitioners (DfE, 2024 update) – seven golden rules and lawful basis.
- DBS duty to refer (SVGA 2006 as amended; DBS guidance).
- Charity Commission – Safeguarding for charities and trustees (trustee accountability).



4 Definitions (Summary)

- **Child:** anyone under 18.
- **Adult at risk (Wales):** experiencing/at risk of abuse or neglect; has care and support needs; unable to protect oneself.
- **Significant harm:** the threshold for multi-agency child protection action; serious or cumulative impact on health/development.
- **Abuse/neglect:** forms include physical, emotional/psychological, sexual, domestic abuse, financial, discriminatory, modern slavery, neglect/self-neglect.



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Roles and Responsibilities

- **Board of Trustees (collectively):** Hold ultimate accountability for safeguarding; assure effective policies, risk oversight, appropriate resources, and culture.
- **Trustee Safeguarding Lead (TSL):** Provides strategic oversight; receives serious incident notifications; liaises with regulators/commissioners as required.
- **CEO: Accountable officer for operational delivery;** ensures reporting/escalation; approves serious incident notifications.
- **Designated Safeguarding Person (DSP):** Provides expert advice, triage and decision support; ensures referrals are made; quality assures records; coordinates learning reviews; maintains the safeguarding risk register and training matrix.
- **Deputy DSP:** Supports the DSP in their role and fulfils DSP functions in DSP's absence.
- **Managers/Team Leads:** Ensure staff compliance, supervision, reflective practice, and safe caseload management.
- **All staff/volunteers/contractors:** Duty to recognise, respond, report, record concerns promptly, following this policy.



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Safer Recruitment and Disclosure

- Use role-appropriate DBS checks (including Barred List checks where eligible), verify identity and right-to-work, take up references that specifically ask about safeguarding concerns, and risk-assess any positive disclosures.
- Where conduct meets the DBS duty to refer criteria and an individual is removed from regulated activity or would have been but for resignation, make a barring referral in addition to any regulatory reporting.
- For information relating to contractors working with 2wish (including counsellors, complementary therapists and play therapists) see section 12 of this document.



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Training, Learning & Supervision

- Minimum standards:
 - **Group B (Level 2)** for colleagues who have regular contact with service users;
 - **Group C (Level 3)** for DSP/Deputy, managers and staff with enhanced safeguarding roles. Refresher training will be arranged through HR at least every 3 years.
- HR will maintain a central training matrix (expiry alerts), mandatory Prevent awareness for frontline staff, and role-specific CPD per the national standards. HR will inform managers with updates on teams training needs (e.g. out of date/ completed). Managers will then follow up with individuals as required during monthly 121s.
- Provide regular supervision and reflective learning after incidents, using Wales Safeguarding Procedures practice pointers. [1] 'Debriefs' will be arranged by the DSL or deputy with all parties involved within 1 week of disclosure. Additional clinical supervision will be offered and arranged to any staff members or volunteers involved in a case.
- All staff are able to feed directly into the safeguarding committee to inform them of training needs, best practice, challenges or concerns surrounding safeguarding and any related topics. Any responses will be reviewed at the next safeguarding committee meeting following the submission of form.



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Recognising Abuse and Responding to Concerns

Anyone may witness or suspect abuse/neglect. If someone is at immediate risk, call 999. For non-emergencies, follow the steps below using the Wales Safeguarding Procedures (in Wales) or local authority/partnership procedures (in England)

8.1

Immediate actions

1. Listen, reassure, do not promise confidentiality.
2. Record word-for-word where possible; note date/time, who was present, and your assessment of risk.
3. Report without delay to the relevant local authority and/or police as appropriate. You do not need DSP permission to report, but you must inform the DSP/Deputy as soon as practicable.

8.2

Making a report (referral)

1. Wales: Use the Wales Safeguarding Procedures and local board information for contact/out-of-hours numbers[1]; document on the organisational [safeguarding register](#).
2. England: Follow local safeguarding partnership procedures[3]; for children, follow Working Together 2026 flowcharts; for adults, consider Care Act s.42 criteria. document on the organisational [safeguarding register](#)



8.3

Allegations Concerning 2wish People (staff/volunteers/contractors/trustees)

- Children (England): Notify the Local Authority Designated Officer (LADO) and follow local procedures; also inform DSP → CEO → TSL.
- Wales: Follow the “Duty to report concerns (including abuse/neglect) about a practitioner” process within the Wales Safeguarding Procedures; liaise with regional board processes.
- Adults: Follow local adult safeguarding processes and consider s.42 Care Act thresholds in England; Wales Part 7 duties apply.
- Police/social care directions take precedence. Where risk indicates, the CEO (or delegate) may suspend pending enquiries. Consider the DBS duty to refer at case conclusion.



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Information Sharing, Data Protection and Confidentiality

- 2wish shares information lawfully, proportionately and promptly to protect people from harm. Consent is not required where there is a lawful basis and sharing is necessary to safeguard a child or adult at risk. Decisions and rationales are recorded
- For special category data, we may rely on DPA 2018 Schedule 1 Part 2, part 18 (“safeguarding of children and of individuals at risk”) and will maintain an Appropriate Policy Document as required by Schedule 1 Part 2.
- Staff must follow the DfE seven golden rules for information sharing.



10 Prevent (counter-radicalisation)

2wish will have due regard to the Prevent duty and:

- Ensure staff complete Prevent awareness training and understand local referral pathways (e.g., Channel).
- Risk assess events/activities and escalate concerns using local multi-agency processes.
- Keep records and cooperate with authorities.

11 Online and Digital Safety

- Apply the same safeguarding standards for telephone/online support as for face-to-face.
- Use approved platforms, protect personal data, avoid personal devices/accounts, and manage social media boundaries with service users.
- Report online harms (e.g., grooming, exploitation, extremist content) as safeguarding concerns via Section 8.
- See 2wish Online Safeguarding policy



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Whistleblowing and Speaking Up

We foster a culture where concerns can be raised without fear. Staff and volunteers can raise safeguarding or conduct concerns through their manager, DSP, or directly to the CEO or TSL. Where internal routes feel unsafe or ineffective, contact: Charity Commission or Protect (whistleblowing charity).

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Partnership and Commissioning

Before working with partners/contractors (including counsellors, complementary therapists and play therapists), 2wish will ensure equivalent safeguarding standards, including policies, DBS where relevant, training, information sharing, and incident reporting.

Agreements will include safeguarding clauses and escalation routes. Any partner/contractor (including counsellors, complementary therapists and play therapists) must follow their own companies' policies and procedures and inform 2wish at their earliest opportunity.



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Record Keeping

- Make contemporaneous records (dated, timed, signed), capturing facts, analysis, decisions, and actions.
- Store securely withing the organisation's database and Safeguarding Referral Register with access on a need-to-know basis.
- Retain per data retention schedules and legal/statutory requirements

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Learning, audit and assurance

- Safeguarding is a standing agenda item at team, Full Staff Meetings (FSM) and board meetings.
- The Safeguarding Committee meets bimonthly to review cases, themes and actions. While supporting the embedding of the safeguarding policy, procedures and training requirements.
- An annual safeguarding audit is presented to the Board (including training compliance, referrals, incidents, DBS referrals, Prevent activity, partnership assurance), alongside the risk register. [1] Learning from this audit is used to update safeguarding and relevant policies, as well as training needs for the following year.



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Equality, Diversity, Inclusion and Welsh Language

We uphold equality and non-discrimination, adjust practice to meet diverse needs, and in Wales provide access to the Wales Safeguarding Procedures (English/Welsh).

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Related Policies and Documents

Code of Ethics; Data protection; Raising a concern; Volunteering; Lone Working;
Prevent guidance; Appropriate Policy Document (DPA)

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Governance, Version Control and Approvals

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Governance, Version Control and Approvals

- Review frequency: Annually, and after; any serious incident, safeguarding review, external guidance or legislation update (e.g., [Wales Safeguarding Procedures](#) or [Working Together](#) updates).
- Approvals: Safeguarding Committee → Executive → Board.
- Change log: maintained on secure internal system.

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Practical Appencacies

1. **Reporting flows:** See Reporting a Concern below (for external contacts including emergency/out-of-hours numbers follow links within reference)
2. **Contacts directory:** local authorities, police, LADOs (England), Regional Safeguarding Boards (Wales), Channel/Prevent, [DBS referral portal](#).
3. **Training matrix** (Group A/B/C; refreshers; [Prevent](#)).
4. **Online safeguarding policy**



Guidance for Reporting a Concern

2wish Staff

- Immediate danger? Call 999. Record facts.
- Concern identified (child/adult at risk). Make a timely referral to local authority/police. Inform DSP/Deputy asap (do not delay referral)
- If allegation about 2wish person → follow LADO/practitioner-concerns route; consider suspension; take HR advice; police/social care directions first; at outcome, consider DBS referral.
- Record everything in 2wish's secure database + safeguarding register; restrict access; update the training/learning log if relevant.
- Attend debrief and clinical supervision as required.

Partner agencies

including; Therapists associated with 2wish

- Immediate danger? Call 999. Record facts.
- Follow own company or organisations safeguarding policy.
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Contact us If you would like further support or information about our services and safeguarding

E: Support@2wish.org.uk

T: 01443 853125



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