

EMPOWERING NEURODIVERGENCE AUDHD COACHING

Safeguarding Policy

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Terminology

‘Provider’ in this context refers to the organisation Empowering Neurodivergence.

‘Company’ in this context refers to the organisation Empowering Neurodivergence.

‘Us, we or our’ in this context refers to the organisation Empowering Neurodivergence.

‘Empowering Neurodivergence’ in this context is the company Empowering Neurodivergence led by its founder and owner Amanda Shepherd.

‘Owner’ in this context refers to the owner and founder Amanda Shepherd.

‘Clients’ in this context refers to individuals accessing the services provided by Empowering Neurodivergence.

Introduction and Policy Statement

Empowering Neurodivergence is an Autism and ADHD coaching service dedicated to supporting adults and children who face challenges in society. We work with individuals across the neurodivergent spectrum to help build skills, increase confidence and achieve personal goals. Through personalised support, practical strategies and one-to-one guidance, we empower our clients to navigate challenges and thrive in all areas of life including personal development, academic success, social interactions and professional growth.

Empowering Neurodivergence is a company founded and led by Amanda Shepherd. We have adopted the Safeguarding Policy in line with *Working together to Safeguard Children* (DfE, 2023), Protecting Vulnerable Adults (OPG, 2023) and the NSPCC Safeguarding Policies and Procedures (2024). Empowering Neurodivergence expects every adult working with or on behalf of the company to fully comply this policy. Accordingly, it applies to all managers, employees, contractors and volunteers working for us. We recognise our responsibility to ensure that effective arrangements are in place to safeguard and promote the welfare of children and adults with additional needs.

All staff and volunteers are required to read and understand Empowering Neurodivergence's Safeguarding Policy and to be fully aware of their duties and responsibilities which include:

- Identifying concerns early to prevent them from escalating.
- Providing a safe and supportive environment for all children and adults.
- Recognising those who may benefit from early intervention.
- Responding appropriately if a child discloses abuse or neglect.
- Following the correct referral process when concerns arise.

By working together and remaining vigilant, we aim to create a safe and inclusive environment for every individual we support.

1.0 Prevention

1.1 We recognise that high self-esteem, confidence, supportive friendships and open communication with a trusted adult are protective factors that help safeguard children.

1.2 We will therefore:

- Establish and maintain an environment where children and vulnerable adults feel safe and are encouraged to speak openly, knowing they will be listened to.
- Ensure that all children and vulnerable adults understand that there are trusted adults within Empowering Neurodivergence whom they can approach if they are worried or facing difficulties and that their concerns will be taken seriously and responded to appropriately.
- Ensure that all adults employed or volunteering at Empowering Neurodivergence receive appropriate training to respond effectively to any disclosures made by clients.

2.0 Procedures and Accountability

2.1 We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Children and Adults Partnership Board's Inter-Agency Procedures. A copy of these procedures can be found at: www.safeguardingcambspeterborough.org.uk/children-board and <https://www.safeguardingcambspeterborough.org.uk/adults-board/>

2.2 The Designated Safeguarding Lead (DSL) is Amanda Shepherd. They can be contacted through on 07356 241600.

2.2.1 The DSL must hold sufficient status and authority within Empowering Neurodivergence to fulfil the responsibilities of the role effectively. They must be provided with the necessary time, training, resources and support to offer guidance to staff and volunteers on all matters related to child welfare and protection.

2.2.3 The lead responsibility for child protection rests with the DSL. This responsibility **cannot** be delegated.

2.2.4 The DSL must undertake appropriate safeguarding training to carry out their responsibility effectively. This training should be updated every two years.

2.2.5 The DSL must be available during Empowering Neurodivergence's hours of operation to discuss safeguarding concerns.

2.3 DSL responsibilities are as follows:

- 2.3.1 The DSL must ensure that all employees and volunteers are aware of:
- The name and role of the DSL.
 - Signs of abuse and neglect.
 - How to report and record concerns.
 - Their individual responsibility to be alert to abuse and refer concerns to the DSL.
 - Their responsibility to help provide a safe environment for children and vulnerable adults.
- 2.3.2 The DSL must ensure that all employees and volunteers:
- Receive safeguarding and child protection training as part of their induction.
 - Undertake refresher training every two years.
 - Receive regular safeguarding updates as needed.
 - Understand their duty to raise concerns about poor or unsafe practice.
 - Feel supported in doing so.
 - Have their concerns handled sensitively and promptly.
- 2.3.3 The DSL must ensure that this safeguarding policy is publicly accessible when requested.
- 2.3.4 Empowering Neurodivergence will:
- Work to develop effective links with relevant services to promote the safety and welfare of all clients.
 - Co-operate with key agencies in their enquiries regarding safeguarding matters in line with Working together to safeguard Children (2023) and Protecting vulnerable adults (2023)

2.4 Record keeping

Empowering Neurodivergence will:

- Keep clear, detailed, accurate written records of concerns about children and vulnerable adults (noting the date, event and action taken), even where there is no need to refer the matter to Social Care immediately.
- Ensure that all records are kept securely, separate from the main client files and in a locked location.
- Make parents/guardians/carers aware that such records exist (where applicable) except where to do so would place the client at risk of harm.
- All actions and decisions will be led by what is considered to be in the best interest of the client.

2.5 Confidentiality and information sharing

- 2.6.1 The Data Protection Act 2023 does not prevent Empowering Neurodivergence from sharing information with relevant agencies, where that information may help to protect a child or vulnerable adult.
- 2.6.2 The DSL will take advice from relevant authorities and together, a decision will be made about what information to share. The decision will consider the balance between the potential risk to the client and the principle of working openly and honestly with parents/guardians/carers.

Empowering Neurodivergence will:

- Ensure staff, volunteers and contractors adhere to confidentiality protocols and that information is shared appropriately.
- Ensure that the DSL only discloses information about a client on a 'need to know' basis including domestic violence notifications.
- Make all employees and volunteers aware that they have a responsibility to share information with other agencies in order to safeguard children and vulnerable adults.
- Ensure that if an employee or volunteer receives a Subject Access Request (under the Data Protection Act 2023) from a client, parent, carer or guardian, they will refer the request to the DSL.
- Ensure that all staff and volunteers are clear with clients that they cannot promise to keep secrets.

2.6 Communication with Parents/Carers/Guardians

Empowering Neurodivergence will:

- Ensure that parents/carers/guardians are informed of the responsibility placed on the company, its staff and volunteers in relation to safeguarding by providing a copy of this policy upon request.
- Undertake appropriate discussion with parents/carers/guardians prior to involvement of another agency unless the circumstances preclude this action. If Empowering Neurodivergence believes that notifying parents/carers/guardians could increase the risk of harm to the client, advice will be sought from Social Care.
- Particular circumstances where parents/carers/guardians **may not** be informed include any disclosure of sexual abuse or physical abuse where the child has an injury.
- Record what discussions have taken place with parents/carers/guardians on the log of concern about a client's welfare or if a decision has been made not to discuss with parents/carers/guardians, recording the reasons why.

3.0 Supporting vulnerable children and adults.

3.0.1 We recognise that abuse or witnessing violence may have an adverse impact on children and vulnerable adults which may last a lifetime without appropriate intervention and support.

3.0.2 We recognise that some clients may develop abusive behaviours and that these individuals may need to be referred on for appropriate support and intervention.

3.0.3 Empowering Neurodivergence recognises that **any** child or vulnerable adult may be subject to abuse and neglect and as such, will support all clients by:

- Creating an ethos which actively promotes a positive, supportive and safe environment.
- Liaise with other agencies which can support a client such as Social Care.
- Strive to develop productive and supportive relationships with parents/carers/guardians.
- Recognising that children and vulnerable adults living in a home environment where there is domestic abuse, drug or alcohol abuse or mental health issues are vulnerable and in need of support and protection.
- Keeping accurate, unbiased records and notifying Social Care where needed.

3.1 Clients of substance misusing parents/carers/guardians

- 3.1.1 Misuse of drugs and/or alcohol is strongly associated with significant harm to children and vulnerable adults especially when combined with other features such as domestic violence.
- 3.1.2 When Empowering Neurodivergence receives information about drug and alcohol abuse, they will follow appropriate procedures.
- 3.1.3 This is particularly important if the following factors are present:
 - Use of family/vulnerable adult's resources to finance the parent's/carers'/guardian's dependency, characterised by inadequate food, heat and clothing for the client.
 - Clients exposed to unsuitable caregivers or visitors e.g. customers or dealers.
 - The effects of alcohol use leading to an inappropriate display of sexual and/or aggressive behaviour.
 - Erratic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental/guardianship vigilance.
 - Disturbed moods as a result of withdrawal symptoms or dependency.
 - Unsafe storage of drugs and/or alcohol or injecting equipment.

3.2 Domestic Abuse

- 3.2.1 Where there is Domestic Abuse in a family, the client will always be affected; the longer the abuse continues, the greater the risk of significant and enduring harm, which they may carry with them through their life and relationships.
- 3.2.2 Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial, and emotional.
- 3.2.3 This definition, which is not a legal definition, includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

3.3 Female Genital Mutilation (FGM)

- 3.3.1 "FGM is a procedure where female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways". (Multi-agency statutory guidance on female genital mutilation, April 2016).
- 3.3.2 The age at which FGM is carried out varies enormously according to the community. The procedure may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy.
- 3.3.3 FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries, including the UK.

- 3.3.4 We take these concerns seriously and employees/volunteers will be made aware of the possible signs and indicators that may alert them to the possibility of FGM. Any indication that FGM is a risk, is imminent, or has already taken place will be dealt with under the protection procedures outlined in this policy.
- 3.3.5 The DSLs will make appropriate and timely referrals to Social Care if FGM is suspected. In these cases, parents will not be informed before seeking advice. The case will be referred to Social Care even if it is against the child or young person's wishes.

3.4 Sexual Exploitation

- 3.4.1 Sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, deceive or forcibly engage in sexual activity in exchange for something the victim needs or wants. The victim may have been sexually exploited even if the sexual activity appears consensual. Sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
- 3.4.2 Sexual exploitation can take many different forms from the seemingly 'consensual' relationship to serious organised crime involving gangs and groups.
- 3.4.3 Exploitation is marked out by an imbalance of power in the relationship and involves varying degrees of coercion, intimidation and sexual bullying including cyberbullying and grooming.
- 3.4.4 It is important to recognise that some children/vulnerable adults who are being sexually exploited do not show any external signs of this abuse and may not recognise it as abuse.
- 3.4.5 Empowering Neurodivergence will seek advice from Social Care if there is any concern that a client may be at risk.

3.5 Peer on Peer Abuse

- 3.5.1 Peer on peer abuse can manifest itself in many ways. This can include sexual bullying, being coerced to send sexual images, sexual assault, and relationship abuse. There are clear links between sexual exploitation and domestic abuse.
- 3.5.2 This form of abuse will not be tolerated, and victims will be appropriately supported. Any indication that a client has suffered from peer-on-peer abuse will be dealt with under the protection procedures outlined in this policy.
- 3.5.3 Consideration will always need to be given to both the victim(s) and perpetrator(s) in these situations.

3.6 Financial or Material Abuse

- 3.6.1 This includes theft, fraud, internet scamming, putting pressure on someone about their financial arrangements (including wills, property, inheritance or financial transactions) or the misuse or stealing of property, possessions or benefits.
- 3.6.2 This is particularly important if the following factors are present:
- A change in living conditions.
 - Selling of possessions.

- Being unable to pay bills, or an unexplained lack of money.
- Money being taken out of an account without a reason.
- Financial documents being lost without a reason.
- Someone being cut off from family, friends or their social network.
- The carer having more money to spend on things like clothes, travel or accommodation.
- Sudden changes to a bank account or how someone uses it.
- New, recent authorised signers on a client or donor's account card.
- Money being taken without permission from the adult at risk's ATM card.
- Changes in how the ATM card is being used (such as more frequently or from different locations).
- Sudden or unexpected changes to someone's will or other financial documents.

3.6.3 Any indication that a client has suffered from financial or material abuse will be dealt with under the protection procedures outlined in this policy.

3.7 Modern Slavery

3.7.1 This covers slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment.

3.7.2 Any indication that a client has suffered or is suffering from modern slavery abuse will be dealt with under the protection procedures outlined in this policy.

3.8 Forced Marriage

3.8.1 Forced marriage happens across all cultures. It's when someone is pressured into an arranged marriage or forced to marry someone they haven't freely chosen. It can also happen if someone lacks the mental capacity to make their own choices.

3.8.2 Signs of forced marriage might be:

- Someone having a brother or sister who has been forced to marry.
- Parents/carers/guardians talking about marriage.
- Hearing talk of weddings or parties.
- Talk of family members coming to live with the family, or family trips overseas.
- Wedding photos, clothes, gifts, Mehdi henna.
- Unreasonable restrictions being placed on someone at home.

3.8.3 Any indication that a client has suffered or is suffering from a forced marriage will be dealt with under the protection procedures outlined in this policy.

3.9 Criminal Exploitation

3.9.1 County lines is a type of criminal exploitation. Urban gangs persuade, coerce or force children and vulnerable adults to store drugs and money and/or transport them to suburban areas, market towns and coastal towns.

3.9.2 Criminal exploitation can happen in any part of the UK. County lines is against the law and a form of abuse.

- 3.9.3 Children and vulnerable adults may be criminally exploited in multiple ways including:
- Drug trafficking.
 - Sexual exploitation.
 - Gang and knife crime.
 - Grooming techniques to avoid capture.
- 3.9.4 Cuckooing happens when a county lines gang takes over the home of a vulnerable adult by coercion or force and uses it as a base to deal drugs from. A cuckooed address is sometimes referred to as a 'trap house', 'bando' or 'spot' by county lines gangs.
- 3.9.5 The vulnerable person may have mental health problems, be disabled, or be in debt to the gang. It's important to remember that cuckooed individuals may need support themselves when county lines activity has been discovered.
- 3.9.6 Behavioural signs of criminal exploitation might be:
- Going missing from school or home, an unwillingness to explain their whereabouts and/or being found in areas they have no obvious connections with (out-of-area).
 - School exclusion(s) and/or a significant decline in school attendance, results or performance.
 - Self-harm or significant changes in emotional well-being, personality or behaviour.
 - Anti-social behaviour or involvement in other criminality.
 - Use of drug and county lines-related slang.
- 3.9.7 Possession signs of criminal exploitation might be:
- Unexplained acquisition of money, clothes, or mobile phones.
 - Excessive receipt of texts/phone calls and/or having multiple sim cards or handsets – this could be a 'burner phone', often an older model which uses an unregistered sim card, but it may also be a smart phone which can utilise web-based apps without a phone number.
 - Carrying or storing weapons.
 - Misuse of substances or possession of drugs or drug paraphernalia such as discarded needles, scales, small snappy bags or cling film.
 - Possession of train tickets for unusual train journeys.
 - Possession of a rucksack or a bag that they are very attached to or will not put down.
- 3.9.8 Physical signs of criminal exploitation might be:
- Suspicion of physical assault/unexplained injuries – these tend to be visible but minor injuries which are issued as a threat, such as cigarette burns or small cuts, but can also be much more serious life-threatening injuries, such as stab wounds.
- 3.9.9 Any indication that a client has suffered or is suffering from a criminal exploitation will be dealt with under the protection procedures outlined in this policy.

4.0 Prevention and Radicalisation

- 4.1 Since 2011, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, vulnerable adults, and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable persons to hold extreme views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

- 4.2 The current threat from terrorism in the UK may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and vulnerable adults susceptible to future manipulation and exploitation. Empowering Neurodivergence is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- 4.3 The Counterterrorism and Security Act, 2015 places a duty on authorities 'to have due regard to the need to prevent people from being drawn into terrorism'.
- 4.4 Any employees/volunteers should be made aware of this duty.
- 4.5 When any employee/volunteer has concerns that a child or vulnerable adult may be at risk of radicalisation or involvement in terrorism, they should speak with a DSL.
- 4.6 The DSL should ensure that all employees/volunteers undergo prevent training during induction. All employees/volunteers should undergo prevent training every two years and should receive regular updates as required.

5.0 Children and Adults with Additional Needs

- 5.1 Empowering Neurodivergence provides a service to children and vulnerable adults with additional needs. We recognise that statistically, children and adults with emotional and behavioural difficulties and those with disabilities are most vulnerable to abuse. Staff and volunteers who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

6.0 Preventing Unsuitable People from Working with Children and Vulnerable Adults.

- 6.1 Empowering Neurodivergence will operate safer recruitment practices including that appropriate DBS and reference checks are undertaken on all employees and volunteers working for the company.
- 6.2 Any allegation of abuse made against an employee or volunteer will be reported straight away to the DSL. In cases where the DSL is subject of an allegation, it will be reported to Social Care.
- 6.3 In the event of an allegation being made against an employee or volunteer, Empowering Neurodivergence will adhere to the relevant reporting procedures outlined in this safeguarding policy.
- 6.4 In the event of an allegation being made against an employee or volunteer, the DSL will liaise with the Local Authority. The DSL should **not** seek to interview the client, employee or volunteers involved until advice has been obtained. Doing so may compromise any police interviews that may be necessary.
- 6.5 Employees or volunteers who are subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension of the employee/volunteer is not mandatory nor is it automatic but, in some cases, employees/volunteers may be suspended where this is deemed to be the best way to ensure that the client is protected.

- 6.6 Consideration must be given to the needs of the client and a recognition that a client may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a child/vulnerable adult to make an entirely false or malicious allegation; although, misunderstandings and misinterpretations of events do happen.
- 6.7 Empowering Neurodivergence will ensure that all employees/volunteers are aware of the need for maintaining appropriate and professional boundaries in their relationships with the clients who utilise our services.
- 6.8 Empowering Neurodivergence will ensure that communication between clients and its employees/volunteers, by whatever method, are transparent and take place within clear and explicit professional boundaries.

7.0 Provider Safeguarding Responsibilities

- 7.1 Empowering Neurodivergence fully recognises its responsibilities with regard to child/vulnerable adult protection and safeguarding. It aims to ensure that policies, procedures, and training of its employees/volunteers are effective and always comply with the law and government guidance.
- 7.2 Empowering Neurodivergence will:
- Ensure that this Safeguarding Policy is reviewed and updated every year. It will be made available to all employees, volunteers and upon request of the general public.
 - Ensure that client's wishes, and feelings are taken into account where there are safeguarding concerns.

Appendix A

Four Categories of Abuse

Physical Abuse:

May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a vulnerable person. Physical harm may also be caused when a parent/carer/guardian fabricates the symptoms of or deliberately induces illness in a child.

Neglect:

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

It may occur during pregnancy as a result of maternal substance misuse.

It may involve the neglect of or lack of responsiveness to a vulnerable person's basic emotional needs. It includes parents/carers/guardians failing to:

- Provide adequate food, clothing and shelter including exclusion from home or abandonment.
- Protect a vulnerable person from physical and emotional harm or danger.
- Ensure adequate supervision including the use of inadequate caregivers.
- Ensure access to appropriate medical care or treatment.

Emotional Abuse:

Is the persistent emotional maltreatment so as to cause severe and adverse effects on a person's emotional and psychological development. It may involve conveying to a person that they are:

- Worthless.
- Unloved/Inadequate.
- Valued only insofar as they meet another person's needs.

It may include:

- Not giving the vulnerable person opportunities to express their views.
- Deliberately silencing them.
- 'Making fun' of what they say or how they communicate.

It may also feature age or developmentally inappropriate expectations being imposed on vulnerable people including:

- Interactions that are beyond the vulnerable person's developmental capability.
- Overprotection and limitation of exploration and learning.
- Preventing participation in normal social interaction.

It may involve:

- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying) causing children and vulnerable adults to feel frightened or in danger.
- The exploitation or corruption of children and vulnerable adults.

Sexual Abuse:

Involves forcing or enticing a child or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the vulnerable person is aware of what is happening.

This may involve:

- Physical contact including assault by penetration (e.g. rape or oral sex).
- Non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.
- Non-contact activities involving:
 - Children looking at, or in the production of sexual images.
 - Children in watching sexual activities.
 - Encouraging children to behave in sexually inappropriate ways.
 - Grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetuated by adult males. Women can also commit acts of sexual abuse as can children.

Appendix B

Useful Contacts

Police Child Abuse Investigation Unit	Tel: 101
Early Help Hub (EHH)	Tel: 01480 376666 early.help@cambridgeshire.gov.uk
Childline	Tel: 0800 1111
NSPCC	Tel: 0808 800 5000
Customer Service Centre – Social Care Referrals	Tel: 0345 045 5203
Emergency Duty Team (out of hours)	Tel: 01733 234 724
Local Authority Designated Officer (LADO)	lado@cambridgeshire.gov.uk Tel: 01223 727 967
Prevent Officers	prevent@cambs.police.co.uk Tel: 01480 422 277

Appendix C

Relevant Documents:

- <https://www.safeguardingcambspeterborough.org.uk/children-board/>
- <https://www.safeguardingcambspeterborough.org.uk/adults-board/>
- <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>
- <https://learning.nspcc.org.uk/safeguarding-child-protection>
- <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- <https://www.gov.uk/government/publications/safeguarding-policy-protecting-vulnerable-adults>
- <https://www.gov.uk/government/publications/the-data-protection-fundamental-rights-and-freedoms-amendment-regulations-2023>
- <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>