Women 2 Women CIC | Company No. 17372913
Registered Address: 5 Brayford Square, London, England, E1 0SG

Safeguarding Children, Young People & Vulnerable Adults Policy

1. Policy Statement

Women 2 Women CIC acknowledges its absolute legal and ethical duty to ensure a comprehensive, safe, and protective ecosystem across all our community operations. We provide high-impact training, mentoring, and support to women and young individuals aged 16–24 who are NEET (Not in Education, Employment, or Training). Our safeguarding standards ensure that everyone, irrespective of age, gender identity, disability, sexual orientation, race, or belief network, has the definitive right to be shielded against violence, exploitation, institutional neglect, or systemic abuse.

2. Operational Core & Multi-Hub Framework

Our delivery operates exclusively through specialized external locations, public community spaces, local authorities, and third-party partner hubs. Our lean operational matrix consists of one Director and a dedicated team of freelance, subcontracted delivery staff. Due to this flexible setup, safeguarding enforcement relies on seamless collaboration between our remote delivery teams and the operational leads of our physical host facilities.

3. Regulatory & Statutory Foundations

This framework complies with all key national safeguarding acts and standards, including:
• The Children Act 1989 & 2004
• Working Together to Safeguard Children (Current Guidance)
• The Safeguarding Vulnerable Groups Act 2006
• The Care Act 2014
• Protection of Freedoms Act 2012 (DBS vetting compliance)
• The UK General Data Protection Regulation (UK GDPR) & Data Protection Act 2018

4. Defining Vulnerability & Core Typologies of Abuse

All staff members and freelance agents must maintain active vigilance for signs of abuse or mistreatment, including:
• **Physical Abuse:** Hitting, slapping, burning, shaking, or enforced physical confinement.
• **Sexual Abuse / Exploitation:** Inappropriate sexual contact, digital exploitation, or coercion.
• **Emotional & Psychological Abuse:** Persistent verbal humiliation, intimidation, or social isolation.
• **Financial/Material Exploitation:** Unauthorized acquisition or coercion involving a participant's assets.
• **Neglect & Acts of Omission:** Failure to provide essential medical attention, physical shelter, or basic care.
• **Radicalisation & Extremist Coercion:** Grooming or radicalization targeting vulnerable young people (Prevent Duty).

5. Governance & Clear Accountabilities

Because Women 2 Women CIC operates with a specialized, lean organizational model, key safeguarding management roles are formally assigned to maintain high legal compliance and accountability:

Designated Safeguarding Lead (DSL)	**Sommer Currie** Responsible for initial intake, logging incident profiles, checking compliance rules, coordinating external agency disclosures, and overseeing mandatory subcontractor vetting.
Ultimate Executive Escalate / Director	**Company Director** Holds legal responsibility for all safeguarding governance, reviewing policy updates, managing budget allocations, and handling unresolved complaints.

6. Partner Hub Coordination & Protocols

When delivering training or support within external partner hubs, our subcontracted team members must strictly follow these coordination protocols:

1. **Facility Check-In:** Review the local building layout, safety exits, and specific onsite safeguarding contacts before starting any delivery program.
2. **Joint Accountability:** If a safety incident or disclosure happens on-site, the subcontractor must report it to both the host building's facility manager and our Designated Safeguarding Lead (Sommer Currie).
3. **Escalation Rules:** Local facility guidelines handle immediate physical emergencies or building safety. Meanwhile, our internal policy covers the overall welfare of the participant and our long-term program safety.

7. Action-Oriented Incident Reporting Flow

If a participant discloses abuse or a subcontractor suspects immediate harm, they must follow these four steps:

- **Step 1: Focus on Immediate Safety** – If there is an urgent physical threat, call emergency services immediately (999). Assure the participant they are safe, but clarify that you cannot keep secrets about their well-being.
- **Step 2: Dual Local Notification** – Inform the host facility's onsite operations contact immediately to address any local safety risks.
- **Step 3: Log the Incident** – Write down exactly what happened within 24 hours using clear, objective language (no speculation). Include the time, date, locations, and the specific words used.
- **Step 4: Formal Escalation** – Send the written report directly to our Designated Safeguarding Lead, **Sommer Currie**, to evaluate next steps and handle any necessary referrals to local social services or authorities.

8. Subcontractor Requirements & Vetting Standards

To ensure full protection for our participants, all freelance and subcontracted staff must:

• Hold a valid **Enhanced Disclosure and Barring Service (DBS) check** before starting any delivery work.
• Complete verified safeguarding training at least once every two years.
• Sign and follow the company's code of conduct, which rules out unapproved 1-on-1 private messaging, off-platform communication, or unscheduled private meetings with participants.

9. Data Security, Confidentiality & Compliance

All records concerning safeguarding disclosures, incident reports, and monitoring details are classified as high-risk sensitive data. They are held securely using encryption, matching the UK GDPR. Access is strictly limited to the Designated Safeguarding Lead and the Director. These records are kept separate from general student folders and are shared only with official public health authorities or legal services.

10. Annual Review Cycle

This framework is reviewed annually or sooner if national laws change or we update our work with partner hubs. Continuous feedback from our delivery partners helps ensure these standards remain practical and effective.