



PALMER & PALMER

PSYCHOLOGY SERVICES

Safeguarding

These were updated and effective from 25th January 2025

1. Purpose

This policy sets out how we, Palmer and Palmer Psychology Ltd, will set out to proactively protect children, young people, and vulnerable adults who receive our services, from harm. This is applied equitably to those who directly use our services and those who may be brought to our attention by proxy of others using our services.

2. Summary

- a. Palmer and Palmer Psychology Ltd takes its safeguarding responsibilities seriously. We have a duty of care to safeguard and promote the welfare of children, young people, and vulnerable adults. Our commitment to safeguarding reflects statutory responsibilities, government guidance and complies with best practice requirements. In summary we:
 - i. Recognise the welfare of children, young people, and vulnerable adults is paramount in all the work we do and in all the decisions we take.
 - ii. Are committed to the welfare of all children, young people, and vulnerable adults, regardless of age, disability, gender or gender reassignment, race, religion or belief, or sexual orientation and in the safeguarding of their equal right to protection from all types of harm or abuse.
 - iii. Recognise that some children, young people, and adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other circumstances.
 - iv. Work in partnership with children, young people, their parents, carers, and other agencies to promote their welfare.
- b. In safeguarding children, young people, and vulnerable adults you can expect us to:
 - i. Help you to be healthy.
 - ii. Support you to learn and grow.
 - iii. Help you to keep safe.
 - iv. Make you feel listened to and heard.
 - v. Treat you with respect, dignity, and acceptance.
- c. To enable us to achieve this, we will:
 - i. Keep up-to-date records, including records of any safeguarding concerns.

- ii. Only undertake work which we believe to be appropriate, ethical, and safe for the person.
- iii. Ensure a confidential space to work on the understanding that should we have a safeguarding concern we are legally obliged to pass these concerns on to the appropriate authorities.
- iv. Work in line with our safeguarding processes as detailed below.

3. Legal framework

This policy has been drawn up on the basis of legislation and guidance that seeks to protect children in England and Wales. A summary of the key legislation and guidance is available from www.nspcc.org.uk/childprotection.

Definitions

a. Children and young people:

- i. **The Children Act 1989** defines a ‘child’ as:

Anyone who has not yet reached their 18th birthday, even if they are living independently, are a member of the armed forces, or is in hospital.

- ii. The [Working Together to Safeguard Children 2018](#) defines ‘safeguarding’ as:

Protecting children from maltreatment.

Preventing impairment of children’s health or development.

Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.

Taking action to enable all children to have the best outcomes.

b. Adults

- i. **The Care Act (s.2)** defines an ‘adult’ as:

A person aged 18 or over.

- ii. **The Care Act 2014 (s.42)** defines ‘adults at risk of abuse or neglect’ as someone who:

Has needs for care and support (whether or not the authority is meeting any of those needs).

Is experiencing, or is at risk of, abuse or neglect.

As a result of those needs, is unable to protect himself, herself (*or their self*), against the abuse or neglect or the risk of it.

c. Inter-relational risk

We recognise that children, young people, and adults may have vulnerabilities which are otherwise hidden or changeable. For example, those with caring responsibilities or those exposed to domestic abuse.

- i. We use the definition of **domestic abuse** as provided in the **Domestic Abuse Act 2021 (s.1)**:

Behaviour of a person ('A') towards another person ('B') is 'domestic abuse' if –

A and B are each aged 16 or over and are personally connected to each other.

The behaviour is abusive.

- ii. Behaviour is 'abusive' if it consists of any of the following –

Physical or sexual abuse.

Violent or threatening behaviour.

Controlling or coercive behaviour.

Economic abuse.

Psychological, emotional, or other abuse.

- iii. And it does not matter whether the behaviour consists of a single incident or a course of conduct.
- iv. A's behaviour may be behaviour 'towards' B despite the fact that it consists of conduct directed at another person (for example, B's child).

d. Domestic Violence and Children

- i. In respect to **children** (defined by the Act as a ‘**person under the age of 18**’), the Act (s.3):

Any reference in this Act to a victim of domestic abuse includes reference to a child who –

Sees or hears, or experiences the effects of, the abuse.

Is related to A or B.

- ii. A child is related to a person for the purposes of subsection (2) if –

The person is a parent of, or has parental responsibility for, the child.

The child and the person are relatives.

e. Abuse and Neglect

- i. Children, young people, and adults may be vulnerable to neglect, abuse, or exploitation from within their family and from individuals or organisations they come across in their daily lives. There are three main categories of abuse, namely: sexual, physical, emotional. In addition to neglect. It is important to be aware of more specific types of abuse and neglect that fall within these categories, including:

Bullying, cyberbullying, and online abuse.

Sexual and criminal exploitation, trafficking, and slavery.

Domestic abuse (uni-) or (multi-) directional and (inter-) generational.

Female genital mutilation.

Historical abuse or neglect.

Radicalisation and extremism (see **Counterterrorism and Security Act 2015**, s.26).

This is **not** an exhaustive list and is provided for illustrative purposes only.

4. The Prevent Duty

- a. Some organisations in England, Scotland and Wales have a duty, as a specified authority under the **Counterterrorism and Security Act 2015 (s.26)**, to identify vulnerable

children and young people and prevent them from being drawn into radicalism, extremism, and terrorism. This is known as the Prevent Duty. These organisations include:

- i. Schools.
 - ii. Registered childcare providers.
 - iii. Local authorities.
 - iv. Police.
 - v. Prisons and probation services.
 - vi. NHS trusts and foundations.
- b. Other organisations may also have Prevent Duties if they perform delegated local authority functions.
- c. In the interest of proactive safeguarding practices, we adopt the Prevent Duties whether the piece of work asserts a legal responsibility or not. We do therefore:
- i. Consider how children can be exposed to different views and receive information from various sources. Some of these views may be considered radical or extreme.
 - ii. We may consider certain views, acts, or threats of acts, to fundamentally be a safeguarding duty of care. These will be dealt with in the same manner as all other safeguarding concerns.
- d. In respect to **‘Prevent Duty’** we use the following definitions:
- i. **Radicalisation:** The process through which a person comes to support or be involved in extremist ideologies. A person may get drawn into acts or threats or terrorism. In and of itself, radicalisation is a form of harm.
 - ii. **Extremism:** The vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. There is typically a political or religious basis and is akin to fanaticism.
 - We do not mean simply holding a difference of opinion, but that the opinion is far outside the mainstream attitudes of society that is or can reasonably be considered harmful, hateful, dangerous, illegal, aggressive, or an opinion which is expressed in a manner that is intended (or could reasonably be considered) to incite hate, fear, or violence.

- The formal definition adopted by the [UK government](#) (2024) is:

The promotion or advancement of an ideology based on violence, hatred, or intolerance, that aims to negate or destroy the fundamental rights and freedoms of others; or undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or intentionally create a permissive environment for others to achieve the results (of the above).

- iii. **Terrorism:** The unlawful use or threat of use of violence and intimidation, particularly targeted at civilians in the pursuit of extreme political or religious aims.
- iv. These terms relate to any person or people, regardless of any other personal characteristic or membership (or not) to any community group.

5. Our Processes

a. Record keeping

- i. A written record **must** be kept about any concern regarding a child, young person, or vulnerable adult where safeguarding concerns are observed or suspected. This **must** include details of the person involved, the nature of the concern and the actions taken, decision made and why they were made. Any such records are kept **in addition** to standard session notes.
- ii. All records **will** be signed and dated. All records **will** be [securely and confidentially stored](#) in line with our General Data Protection policy.

b. Information sharing

- i. Palmer and Palmer Psychology Ltd expects all directors, employees, contractors, volunteers, and trustees to maintain confidentiality. Information will only be shared in line with our General Data Protection policy.
- ii. However, information **must** be shared with the relevant authority if a child, young person, or vulnerable adult is deemed to be at risk of harm.
- iii. Where this person is in **immediate danger**, or **a crime has been committed**, we are required to report the matter to the police. In these cases, the child, young person, or adult should be supported whilst a report is made for an emergency response (999).

- iv. The person acting on behalf of Palmer and Palmer Psychology Ltd must **not** question the child, young person, or adult, but continue to make records of any continued *disclosure* and *facts*.
- v. The person acting on behalf of Palmer and Palmer Psychology Ltd must **not** release any information to the parent or carer or any other third party until the police have arrived. The police will then take over.
- vi. The person acting on behalf of Palmer and Palmer Psychology Ltd must ensure their records are stored on the person's file and hand a copy to the appropriate authorities, including the police. The matter must be brought to the attention of the co-directors who also hold Designated Safeguard Lead (DSL) responsibilities.
- vii. In broad terms, information sharing may take place where:

We are told something that puts the person or someone else at risk of harm.

We become aware, from a third party, that the person or others may be at risk of harm.

An accumulation of information indicates the person, or others may be at risk of harm.

We are otherwise directed to release the client's records by appropriately appointed authorities (e.g., by Court Order, the police, or similar). Records must **not** be released to anyone who is or may be implicated in the allegations until authorised by a DSL or, in the event the disclosure involves one of our DSLs, the authorisation of the second DSL.

6. Training and Awareness

- a. Palmer and Palmer Psychology Ltd will ensure an appropriate level of safeguarding training is available to its Trustees, Employees, Volunteers, and any relevant persons linked to the organisation who requires it (e.g., contractors).
- b. For all employees who are working or volunteering with children or vulnerable adults, this requires them as a minimum to have awareness training that enables them to:
 - i. Understand what safeguarding is and their role in safeguarding children, young people, and adults.
 - ii. Recognise a child, young person, and adult's potentially in need of safeguarding and act.

- iii. Understand how to report a safeguarding concern.
- iv. Understand dignity and respect when working with children, young people, and vulnerable adults.
- v. Have knowledge of this Safeguarding Policy and our policies which cover data protection.

7. Safe Recruitment & Selection

- a. Palmer and Palmer Psychology Ltd are committed to safe employment and safe recruitment practices, that reduce the risk of harm to children, young people, and vulnerable adults from people unsuitable to work with them or have contact with them.
- b. All members of our workforce have an Enhanced Disclosure and Barring Service (DBS) Certificate. All members **must** use the DBS update service which allows relevant parties to check the person's DBS status.
- c. Those working on Palmer and Palmer Psychology Ltd business, do **not** have to provide a *copy* of their DBS to schools, parents, or any other person or organisation. In some cases, there will be very legitimate reasons for this refusal, including but not limited to where our service involves litigation (e.g., expert witness services). However, in these cases the person(s) acting on behalf of us, must be cleared by one of the company directors and be provided with a letter of reassurance to the requesting party.
- d. In general, the person(s) acting on behalf of us, should be prepared to provide the necessary details of their DBS for another organisation to check details on the DBS update service. Generally, the person(s) should also be prepared to *show* their certificate if requested by another organisation or agent representing a member of the public (e.g., a solicitor representing a parent).

8. Social Media

Palmer and Palmer Psychology Ltd may, from time to time, use social media now or in the future. However, all members are expected to follow the British Psychological Societies guidance on social media use. This can be found here:

www.bps.org.uk/guideline/supplementary-guidance-use-social-media

Personal views do not necessarily reflect the opinions of Palmer and Palmer Psychology Ltd and should not be taken as such.

9. Use of Digital Technology

- a. Palmer and Palmer Psychology Ltd does **not** permit any Director, Employee, or Associate to use mobile phones or other digital technology to:
 - i. **Photograph** any child, young person, vulnerable adult, or other person.
 - ii. **Video record** any child, young person, vulnerable adult, or other person.
 - iii. **Post on any social media platform available now or that might become available in the future**, about any child, young person, vulnerable adult, or other person with which they have come into contact with whilst performing business on behalf of Palmer and Palmer Psychology Ltd.
 - iv. **Audio record** any child, young person, vulnerable adult, or other person.
 - v. **To use any other mobile device or digital technology to record or store photographs, video recordings, social media posts, and audio recordings** of any child, young person, vulnerable adult, or other person or place with which they have come into contact with whilst performing business on behalf of Palmer and Palmer Psychology Ltd.

- b. Palmer and Palmer Psychology Ltd **do permit** our Directors, Employees, and Associates to use digital technology to make a record of the following:
 - i. Contextual information that is otherwise difficult or impossible to capture but is material to the delivery of any part of the service. Examples include records of serious incidents (e.g., damage caused *following* an aggressive outburst), workstations or areas (e.g., where a client does or it is proposed they will work from), functional materials (e.g., visual timetables, ‘calm’ spaces, and similar).
 - ii. Work, intervention, progress, and similar paper-based material whether this originates internally or externally to Palmer and Palmer Psychology Ltd. Examples include intervention, progress, and in-school activities which are originals or are not easily sent by secure email (e.g., coursework, artwork, trackers, etc.). Another example would be the recording of assessment or intervention work carried out by us, such as photographs or video of play, artwork, attachment (relational) analysis, and dynamic assessments.

- c. These are **examples only**. The psychologist will need to use their own judgement in line with these guiding principles:
 - i. The use of digital technology will be used to record evidence, which is otherwise difficult or impossible to obtain through other means.
 - ii. The record is reasonable and proportionate to the assessment.

- iii. The record is material to any opinion you may form as part of the assessment process. The examples provided are all considered ‘material’ because they are critical to provide a comprehensive analysis or complete record of an event.
 - iv. The record is non-intrusive. This means, the data is collected in a manner that is sensitive, discrete and with verbal agreement from the owner or in-setting lead for your visit. In this case, the name and designation of the person giving consent must be taken.
 - v. The record upholds dignity and anonymity. This means, not taking a recording of the child or any other person or identifiable feature (e.g., school emblem, company name, etc.). Where this is not possible, the data must be edited to remove such information. If this means removing too much information that the record is no longer ‘material’, you must not use digital technology to capture it.
- d. In general, without explicit, **signed consent**, digital technology should only be used to record anonymised documents (e.g., artwork) or scenes (e.g., aftermaths of an event).
- e. There are some examples where capturing a person or other identifying information on a digital record is absolutely necessary. This includes, for example, interactions as part of attachment-based assessment, recordings of dynamic assessments, or training videos (e.g., those activities which will contribute to marked coursework or reflective practice). In these cases, **explicit written and signed consent** of the person and their legal guardian (where the person is under 18 years old) must be obtained. This will clearly identify:
- i. What media will be captured (audio recording, video recording, photograph, etc.).
 - ii. By what means the media will be captured by.
 - iii. How that media will be used.
 - iv. How that media will be stored and disposed of.
 - v. How the person and/or their legal guardian can withdraw consent and any limitations to that consent, or any confidentiality promise that is given.
- f. In these circumstances, if signed consent is not given, then it is very unlikely the service will be deliverable. Where this is the case, a clear explanation should be provided to the client and, where possible and appropriate, an alternative offered.

10. Whistleblowing

It is important that people within Palmer and Palmer Psychology Ltd have the confidence to come forward to speak or act if they are unhappy with anything. Whistleblowing

occurs when a person raises a concern about dangerous or illegal activity, or any wrongdoing within their organisation. This includes concerns about another employee or volunteer. There is also a requirement by Palmer and Palmer Psychology Ltd to protect whistle-blowers. Our colleagues will follow guidance set by the British Psychology Society (BPS) and Health and Care Professions Council (HCPC), as well as any legal requirements and official guidance on whistleblowing.

11. Protecting our team

- a. Nobody goes to work to be abused, insulted, or attacked. Whilst we appreciate there will be many situations where emotions are running high, there is never a reason for one person to act in a way that may cause alarm, distress, or harm to a health and care professional who is trying to help. We will always treat our clients and others with respect. We therefore ask you do the same.
- b. We also understand that, from time to time, words and actions can occur without intention to cause alarm, distress, or harm. This is why our team, and associates will normally reflect back to you, in the first instance, that your words or actions are problematic. However, we take a **zero-tolerance** approach to any form of abuse towards any member of our team, contractors, partners, or agents working with or on our behalf. In this respect, the following **applies unilaterally** for **all** those working with, as part of, or on our behalf:
 - i. Home visits are undertaken at the sole discretion of the psychologist. We will never insist a psychologist will undertake a home visit.
 - ii. Where such lone working takes place, the team member must make at least one other team member (known as a 'Lone Worker Angel') aware of their whereabouts, proposed visit times, purpose of visit, and expected duration.
 - iii. The person undertaking the home visit **must:**

Let their Lone Worker Angel know the name of the client and home address of where the work will take place. They must also let their Lone Worker Angel know the nature of the work and estimated duration.

Phone the Lone Worker Angel to let them know if the session is over running and provide an estimated extension duration.

Allow their Lone Worker Angel to access their 'find my/me' function on their digital device. The Lone Worker Angel will then carry out remote checks if they have not heard from the person within 10 minutes of their expected end time.

At 15 minutes, the Lone Worker Angel will phone the person. If there is no answer, the Lone Worker Angel will make another call no more than five minutes later. If there is still no response, the Lone Worker Angel will make a report to the police to do a welfare check.

- c. We will **refuse to work with you** if:
- i. You make any threats or intimidate any of our team members or associates. Or it comes to our attention that you have a history of threatening, abusive, or intimidating behaviour towards other health and care professionals.
 - ii. You express views which could be considered derogatory to others based on their race, religion, sexual orientation, gender, or other characteristic and that could be considered offensive or abusive towards our team members, other service users, or the general public. In these cases, we will draw your attention to the expression in the first instance, remind you in the second instance, and bring our work to an end on the third occasion. We reserve the right, however, to immediately cease working with you if our team member(s) deem it necessary, or they feel personally threatened, at any time.
 - iii. Any act or threat of an act of violence, either physical or verbal. Or expressed opinions which are, or could be perceived as, inflammatory, slanderous, defamatory, insulting, or degrading to a third party. If these opinions are of a serious nature, but have not been expressed to a third party, our team member may choose to cease our contract with you.
- d. In the case of **any** safeguarding event, including against our team members, **you will remain liable for all associated fees and costs per our Terms and Conditions**. We may also take further action, including, but not limited to:
- i. The shortening or cancellation of part or all remaining services originally contracted with you.
 - ii. A partial or complete ban on accessing our services in the future.
 - iii. Referral or report to external agencies, which may include the police, social care, or other relevant agent.
 - iv. Remedial action such as bringing a civil claim for costs due, for example, as a result of infringement, physical or emotional harm, any loss or reputational damage caused to our business, Directors, employees, contractors, and any other individual or organisation we may work with from time to time, as a result of your actions, whether directly or indirectly caused.

12. Important Contacts

Safeguarding Leads: Dr Nick Palmer & Dr Nicola Palmer

Address: 54 Thorpe Road, Norwich, NR1 1RY

Email: npalmer@papps.org.uk

Phone: 01603 555 670

NSPCC Helpline: 0808 800 5000

Local Authority safeguarding reports: search 'safeguarding' followed by the name of your council to see the most relevant contacts for your area.