

Hidden Strength

Teenage & Young Adult Mental Health Platform

Safeguarding and Child Protection Policy

22nd April 2024

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Safeguarding and Child Protection Policy

Mission Statement

At Hidden Strength we believe that everyone has the right to live free from abuse of any kind. We have a responsibility to keep children and adults, including adults at risks, safe, and we are committed to protecting them in all our activities. We will do everything in our power to ensure children and adults who come into contact with Hidden Strength, in any capacity, are safeguarded.

We will do everything in our power to ensure all those who come into contact with Hidden Strength are safeguarded. Safeguarding is central to our values.

Hidden Strength's priority is to offer a resource that is safe, supportive and inclusive.

Who the policy is for

This policy applies to everyone working or engaged by Hidden Strength, including permanent and temporary employees, volunteers, trustees, self-employed contractors, or anyone else working on behalf of Hidden Strength, or coming into contact with Hidden Strength through its work, henceforth to be referred to as "employees and associates".

This policy also applies to the children and young adults who benefit from the service Hidden Strength provides, henceforth to be referred to as "our community".

For the purpose of this policy, a child is referred to as any individual up to and including their 18th birthday.

We will treat any breach of this policy very seriously. For employees, failure to follow this policy could lead to disciplinary action, which may ultimately result in dismissal. For associates, we reserve the right to immediately terminate your contract and for trustees, removal from the Board. For members of our community it may result in you being barred from using the Hidden Strength platform.

Note to our community users – there is a summary of this policy [refer to User Policies document], do go straight to that, if you just want a straightforward explanation of what this policy is, what it means to you and what to do if you have any worries about your safety or well-being, or anyone in the community's safety or well-being.

Scope

This policy has been developed in accordance with the requirements and principles established by the relevant legislation and statutory guidance in England, including but not limited to:

- The Care Act 2014
- Equality Act 2010
- Human Rights Act 1998
- Data Protection Act 2018
- Mental Capacity Act 2005
- The Children Act (1989) and (2004)
- Working Together to Safeguard Children 2023
- The Charity Commission

This policy should be read alongside Hidden Strength's relevant policies and procedures, including but not limited to:

- Hidden Strength Threshold Document (Appendix Five)
- Hidden Strength Ten Pillars of Safeguarding (Appendix Six)
- Hidden Strength Community Guidelines (Refer to User Policies document)

Objectives

- To ensure that Hidden Strength's employees and associates understand their responsibilities in relation to safeguarding and know how and when to escalate concerns within Hidden Strength and externally
- To ensure our community understands what is meant by safeguarding, what their responsibilities are and what Hidden Strength's responsibilities are to them
- To safeguard and promote the wellbeing all those who come into contact with Hidden Strength, in line with legislation, statutory guidance and local policies and procedures
- To support practitioners who carry out assessments, respond to queries and those who carry out interventions to support children and young adults.

Hidden Strength's Commitment to Children Specifically

- Hidden Strength takes a child-centred approach and recognises the importance of the voice of the child
- The child's welfare is paramount; child protection concerns will always be shared with relevant agencies, even if this is contrary to the child's wishes
- Sexual activity in relation to a child under 13 years of age is a criminal offence and will always lead to a referral to statutory services; underage sexual activity is a possible indicator of vulnerability in children
- Sexual activity in relation to a child deemed to be aged between 13 and 16 will be considered in line with legislation and statutory guidance, including Gillick competence and Fraser Guidelines
- Hidden Strength recognises that the age of consent to sexual activity is 16 however is also mindful that individuals aged 16 and 17 are still children, in law. Hidden Strength recognises the vulnerability of that age group and will therefore consider the individual as a child first

Guiding Principles

This policy is based on the following principles:

- Safeguarding and promoting well-being and welfare means protecting the rights of all individuals to live in safety, free from abuse and neglect
- Safeguarding is everyone's business
- The protection and welfare of individuals is paramount
- All people, regardless of age, ability, gender, racial heritage, religious belief, sexual orientation, culture or identity, have a right to equal protection from all types of harm or abuse and no person or group of people should be treated less favourably than others in being able to access services which meet their particular needs
- Hidden Strength values freedom of speech as a fundamental right underpinning our society's values but recognises that free speech is not an unqualified privilege and must be subject to laws and policies governing equality, human rights, community safety and community cohesion

- Some children and adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs, disability, age or other factors
- Working in partnership with individuals within our community, and statutory services where relevant, is essential in promoting well-being and preventing harm
- Our safeguarding policy will be available for all members of our community to access
- Hidden Strength's priority is to offer a resource to our community that is safe, supportive and inclusive. For that reason, all aspects of the application are moderated.
- Hidden Strength will only work with partners who have aligned objectives in supporting children and young adults and for whom the welfare of individuals is paramount.
- We have a commitment to safer recruitment, selection and vetting that include checks into the eligibility and the suitability of all individuals associated with Hidden Strength who have direct or indirect contact with our community.
- We have a complaints procedure which is an open and well publicised way in which children and adults can voice concerns about unacceptable and/or abusive behaviour.

Code of Conduct

All employees and associates will seek to keep our community safe by:

- Valuing them, listening to and respecting them
- Keeping them at the centre of everything we do
- Adopting safeguarding practices throughout every area of functionality
- Providing effective management for Hidden Strength staff through supervision, support and training
- Sharing child protection/young adult at risk concerns with statutory services if it is deemed that individual, or a child/young adult at risk in their family/community is either suffering abuse, or at risk of abuse, in line with our threshold document

It is an expectation of Hidden Strength that all therapists maintain an up-to-date knowledge of safeguarding both children and adults, including adults at risk and undertake safeguarding training as a minimum every three years.

The purpose of this policy is to:

- protect individuals from harm
- inform our partners, our community and the general public of our overarching principles in relation to safeguarding
- provide all Hidden Strength employees and associates with the overarching principles and procedures that guide our approach to safeguarding

Safeguarding roles at Hidden Strength

All those who work for or with Hidden Strength share the responsibility for safeguarding and protecting our community. In addition there are individuals within the organisation with specific safeguarding responsibilities.

The Trustees are ultimately responsible for ensuring that reasonable steps are taken to protect from harm people who come into contact with Hidden Strength. Trustees must comply with Hidden Strength's policies and procedures on safeguarding.

The CEO has delegated authority for safeguarding to ensure that Hidden Strength's approach to Safeguarding is set out through a policy, operating guidance and associated procedures.

CEO, Linsey Lunny linsey@hiddenstrength.com 07974218662

The Designated Safeguarding Lead is x – **to be added, with contact details.**

Hidden Strength employs an Independent Safeguarding Advisor for day-to-day advice, as well as working closely with a panel of experts, all of whom have considerable knowledge and expertise in safeguarding. Two of the members of the panel have particular and extensive knowledge and expertise in the field of digital safeguarding.

Safeguarding in the Online and Digital Space

Hidden Strength recognises the importance of safeguarding in the online and digital space, facilitating an online community; the unique challenges that brings and the need to put additional safeguarding measures in place to keep our community safe online. Hidden Strength has developed rigorous policies and procedures to reflect this.

What do we mean by digital safeguarding?

Digital safeguarding means: the protection from harm in the online environment through the implementation of effective technical solutions, advice and support and procedures for managing incidents.

Safeguarding children from digital / online risks can be examined in 3 ways: risk from content (inappropriate or mass distribute content), conduct and contact (children being victims of interactive situations)

What Hidden Strength will do to safeguard our community (Please see below at appendix 6)

The reporting process

If you have a safeguarding concern about a member of our community, or a member of staff or associate, or one of these individuals makes a disclosure of possible abuse to you **follow the flowchart** and fill in a Safeguarding Concern Reporting Form. If you are a community member please use the "report something" button on the app.

What to do if you have a safeguarding concern

Staff member has a safeguarding concern about a member of our community or a member of staff or associate, or a child or adult makes a disclosure of possible abuse

With our community this might be within a chat forum, within a therapy session, in a 'life ring' interaction or in any other context in which communication with a community member takes place

- A. If the concern comes from a member of our community clarify if there is anything they need right now

[Someone to talk by text/book a session tomorrow/self-help guidance/immediate protection]

B. In line with the threshold document consider key presenting issue[s] and risk level. If it is a community member ask if they want anyone else involved.



In line with the threshold document, in an emergency, i.e. the child or young adult, deemed to be an adult at risk, is in the process of attempting to take their own life, or is planning to do so imminently, meaning within the next few hours, employee to contact the emergency services by telephoning 999, having accessed the individual's contact details



Inform the Designated Safeguarding Lead in writing by completing the safeguarding concern form, within one hour, if the employee has alerted the emergency services, otherwise within 24 hours

[decision-making timescales for Hidden Strength - low risk = can wait for a decision, medium = decision and action required within 1 week, high = decision and action required within 24 hours]



If necessary the Designated Safeguarding Lead makes contact with the Independent Safeguarding Advisor for advice



Onward referral / notification required

If a referral to an external agency is required, unless it is an emergency and the assistance of the emergency services are required, any referral will be agreed by the CEO, on the advice of the Independent Safeguarding Advisor, who will make the referral and with agreement as to what information needs to be shared (see Appendix 4).

Escalating Concerns

It is important to note that as an employee or associate of Hidden Strength if you raise a safeguarding concern or pass on an allegation, you have a responsibility to ensure your concern is addressed to your satisfaction.

Therefore, if you feel that your concern has not been addressed to your satisfaction by the Designated Safeguarding Lead or the Independent Safeguarding Advisor, you should escalate the matter to the CEO of Hidden Strength and then, if necessary, to the local authority.

Remember

If you are worried do something about it and you will always be protected by the law if you are following the reporting process set out in this policy and you are sharing information in good faith that you think someone is being abused

Allegations against Employees/Associates

If an allegation or disclosure is made about an employee or associate confidentiality needs to be maintained with no discussion regarding the concern/allegation with anyone else. It is essential that any investigation is not compromised by staff sharing information or attempting to investigate before reporting – this would include asking leading questions to the person making the allegation. It is also essential to maintain confidentiality and not to speak to anyone other than the Designated Safeguarding Lead because there may be a misunderstanding and that person may be entirely innocent.

The Designated Safeguarding Lead will inform the Independent Safeguarding Advisor and the CEO and a decision will be made on what action needs to be taken and whether advice needs to be sought from, or a referral made to, statutory services, including the Local Authority Designated Officer. If the concern/allegation is in relation to a therapist, the Lead Psychologist will also be informed and be part of the decision-making team. Legal advice will be taken by the CEO about possible suspension, during any investigation.

If statutory services become involved the outcome of the external investigation will inform the action taken by Hidden Strength. This may result in an internal investigation being conducted by Hidden Strength.

Supporting those involved

- If the allegation is in relation to an employee, the employee will be given a staff liaison point for the period of investigation by statutory services and Hidden Strength.
- The employee will be kept informed about progress and informed of outcome and will be offered appropriate support by the staff liaison point while the case is ongoing
- If the allegation is in relation to a specific community member, they will be supported by the Lead Psychologist

Confidentiality

- If relevant, Hidden Strength will be guided by the police in matters relating to press/media

Information Sharing & Confidentiality

The protection of children and young adults at risk will take precedence over other legal rights. Please be assured that as long as information is shared in an appropriate manner, using internal and local authority protocols, and in good faith, the law will protect you. You should ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and shared promptly. Always follow the seven golden rules of information sharing, as set out in Appendix Four.

Although not a legal requirement, the position of Hidden Strength is the welfare and protection of our community is our priority and information will be shared with statutory services, as set out in our threshold document (see Appendix Five).

Governance

The safeguarding policy will be reviewed, approved and endorsed by the advisory board annually or when legislation changes. Hidden Strength has a safeguarding quality assurance framework, as set out in Appendix Three.

A Summary of the Safeguarding Policy for Our Community

Hidden Strength's community safeguarding principles

In order to uphold these principles our community must follow our community guidelines:

We see it as our job to protect our community – you - the very best we can. It is your job to stick to our rules, which we call the Community Guidelines [User Policies, page 3] and that way we can have a thriving community where everyone looks after each other and helps each other.

What does “Safeguarding” mean?

The very first question people often ask is “What is Safeguarding”? For us it means doing everything we can to keep our community and anyone connected to Hidden Strength safe, in everything we do. This includes all employees and other people linked to Hidden Strength sticking to the Code of Conduct (p.5). For you it means sticking to the rules, the Community Guidelines being kind and considerate, not only to the community, but also to the therapists. For all of us we have to stick to/work to Hidden Strength's Ten Pillars of Safeguarding (Appendix 6).

For us it also means having systems in place where people can share any worries they have about anyone's behaviour in the Hidden Strength community, whether that is a child/young adult or a therapist, or anyone else connected to Hidden Strength.

The Law

All our policies and procedures operate within the law and within guidance that the government publishes.

- The law says you are a child until you are 18
- The law says that sexual activity in relation to a child under 13 years of age is a criminal offence
- The law says the age of consent to sexual activity is 16

Our Priorities & Confidentiality

Our greatest priority is your safety and well-being. The law says that there are particular groups of people who are more vulnerable and need more protection, and that includes children, who the law says is anyone up to the age of 18, and also some adults known as “adults at risk”. For that reason, in some special circumstances, Hidden Strength will get advice from social care, (they used to be called social services) and from the police and if a therapist judges that someone is about to seriously harm themselves, or take their own life, they will call the emergency services. This is all written in Hidden Strength's Threshold Document (Appendix Five).

What to do if you are worried someone in our community is not sticking to the Community Guidelines, or you are worried someone might be being abused, or you are worried about the behaviour of a Hidden Strength staff member, including a therapist

Use the “Report” function. It will take you through what to do step-by-step.

And please remember... we are all responsible for safeguarding each other.

Appendix One

Definitions

“Safeguarding” and “Child Protection”

In terms of adults The Care Act 2014 defines adult safeguarding as “protecting a person’s right to live safely, free from abuse and neglect”. There are more categories of abuse with adults than there are with children. With adults the categories are physical abuse, emotional/ psychological abuse, financial abuse, sexual abuse, organisational abuse, neglect, discriminatory abuse, domestic violence, modern slavery and self-neglect.

In terms of children, the definition of safeguarding is broader and is set out in “*Working Together to Safeguard Children 2023 - A guide to inter-agency working to safeguard and promote the welfare of children*”. This is the statutory guidance that sets out the legislative requirements and expectations of individual services to safeguard and promote the welfare of children.

Working Together to Safeguard Children 2023 does not separate safeguarding and promoting the welfare of children. This is the definition:

- Protecting children from maltreatment;
- Preventing impairment of children’s health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes
-

Separate to safeguarding children is “child protection”. Child protection is defined in the Children Act 1989 as where there is “reasonable cause to suspect a child is suffering, or is likely to suffer, significant harm”. The Children Act 1989 introduced significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Physical abuse, sexual abuse, emotional abuse and neglect are all categories of significant harm. Harm is defined as the ill treatment or impairment of health and development.

In simple terms, safeguarding is the overall well-being of the child and every professional and every organisation is responsible for the safeguarding of children. Within that there is child protection, when it is thought a child is either being maltreated or is at risk of maltreatment.

Age of a Child

A child becomes an adult in law at 18 in the UK, this is in line with the United Nations Convention on the Rights of the Child. Many people use the term “young people” but there is no legal definition for the age of a “young person”. 16 and 17-year-olds are children, in legal terms.

Gillick Competence

Gillick competency and Fraser guidelines help people who work with children to balance the need to listen to children's wishes with the responsibility to keep them safe. When practitioners are trying to decide whether a child is mature enough to make decisions about things that affect them, they often talk about whether the child is 'Gillick competent' or whether they meet the 'Fraser guidelines'.

Although the two terms are frequently used together and originate from the same legal case, there are distinct differences between them:

The Fraser guidelines still apply to advice and treatment relating to contraception and sexual health but Gillick competency is often used in a wider context to help assess whether a child has the maturity to make their own decisions and to understand the implications of those decisions.

Assessing Gillick competence

There is no set of defined questions to assess Gillick competency. Professionals need to consider several factors when assessing a child's capacity to consent, including:

- the child's age, maturity and mental capacity;
- their understanding of the issue and what it involves - including advantages, disadvantages and potential long-term impact;
- their understanding of the risks, implications and consequences that may arise from their decision;
- how well they understand any advice or information they have been given;
- their understanding of any alternative options, if available;
- their ability to explain a rationale around their reasoning and decision making.

Remember that consent is not valid if a child is being pressured or influenced by someone else.

(<https://learning.nspcc.org.uk/child-protection-system/gillick-competence-fraser-guidelines>)

Adult at Risk

An adult at risk is defined by the Care Act 2014 as a person 18 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
- 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.

Local Authority Designated Officer (LADO)

The role of the LADO is set out in Working Together to Safeguard Children 2023 and is governed by local authorities' duties under section 11 of the Children Act 2004. The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence;
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by an employer of disciplinary action in respect of the individual.

Appendix Two

Categories of Abuse

Child Abuse

The categories of abuse of children are set out in the statutory guidance *Working Together to Safeguard Children 2023* and are as follows:

Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as

involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity

- a) in exchange for something the victim needs or wants, and/or
- b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

1. provide adequate food, clothing and shelter (including exclusion from home or abandonment)
2. protect a child from physical and emotional harm or danger
3. ensure adequate supervision (including the use of inadequate care-givers)
4. ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Hidden Strength recognises there are other forms of abuse of children, including female genital mutilation, fabricated or induced illness, child criminal exploitation, including sexual exploitation and county lines, child trafficking, modern slavery, child-on-child/peer-on-peer abuse, domestic abuse, so called "honour-based" violence and abuse and extremism.

Hidden Strength will follow Prevent guidelines if the concern is about extremism.

Adult Abuse

There are ten categories of abuse for adults:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

For details of types of each kind of abuse and possible indicators, see the following link:
<https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse>

Appendix Three

Safeguarding Quality and Assurance Framework

The Designated Safeguarding Lead, working with the Independent Safeguarding Advisor and the CEO is responsible for the monitoring, revision, and updating of this policy. On a quarterly basis, the Designated Safeguarding Lead will produce a report for the CEO which provides assurance for the implementation of this policy across the following areas:

- The number of safeguarding concern forms completed in that quarter and a broad description of what those concerns are
- The number of referrals to external agencies, which those agencies were and what their response was
- How many of the concerns in that quarter are now resolved and how many are outstanding
- A summary of how the organisation is working effectively to safeguard our community
- Robust processes in place to learn lessons from incidents
- Evidence Hidden Strength is appropriately engaged with relevant external agencies, in terms of safeguarding
- The number of staff that has been trained on safeguarding

On an annual basis, the Designated Safeguarding Lead will produce a report which is reviewed and signed off by the board. The report has the dual purpose of not only providing assurance but also enabling any themes, common issues, emerging trends and system-wide learning to be identified from across the organisation.

Hidden Strength is committed to learning and improving in all matters in relation to safeguarding.

Appendix Four

The seven golden rules to sharing information

Source:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk.

You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Appendix Five

Hidden Strength Threshold Document

Definitions

For the purpose of this document it will be the employee's judgement whether a child is the age they say they are, or a young adult is deemed to be an adult at risk, within the definition of the Care Act 2014, rather than this having to be proven.

Consent

If Hidden Strength considers a child or young adult at risk who lacks mental capacity, is at risk of harm, every effort will be made to work in partnership with the child/young adult at risk. In the first instance we will always seek the consent of the individual to share information with the relevant statutory service.

Because, as clearly stated in our safeguarding policy, the welfare and safety of children and young adults at risk is paramount to Hidden Strength there are extreme circumstances in which Hidden Strength would share details of a child, or young adult deemed to be a young adult at risk lacking mental capacity, as defined by the Care Act 2014, even if it is against the wishes of the child/young adult at risk. Those circumstances are as follows:

1. **In an emergency.** If, during a therapy session, a therapist assesses that child/adult at risk lacking mental capacity is either in the process of attempting to take their own life, or are planning to do so imminently, meaning within the next few hours, or is at risk of immediate danger from another person, the therapist will access the child/adult at risk's contact details and make an immediate referral to the relevant healthcare professional, including the emergency services.
2. **In all other circumstances, in respect of children.** If a child is not deemed to be at risk of immediate harm but concerns have been raised in line with the safeguarding policy, and it is the assessment of the Hidden Strength Safeguarding Lead that the child is suffering, or likely to suffer significant harm, as defined by the Children Act 1989, Hidden Strength will follow the Royal Borough of Windsor and Maidenhead's Safeguarding Partnership Procedures

https://proceduresonline.com/berks/windsor_maidenhead/p_info_sharing.html Hidden Strength does not hold home addresses of each community member and it is for that reason the initial contact will be made with the Royal Borough of Windsor and Maidenhead Children's Social Care.

- 3. In all other circumstances, in respect of young adults at risk.** If a young adult at risk is not deemed to be at risk of immediate harm but concerns have been raised in line with the safeguarding policy, the Hidden Strength Safeguarding Lead will follow the Berkshire Safeguarding Adults Board information sharing protocol <http://www.sabberkshirewest.co.uk/media/1407/pan-berkshire-sab-information-sharing-protocol-v10.pdf>
- 4. Information sharing in respect of all other young adults.** If there are no children/adults at risk potentially at risk of harm, and the young adult is deemed by the therapist/Hidden Strength Safeguarding Lead to not be a young adult at risk, and is deemed to have mental capacity, their contact details will not be accessed and Hidden Strength will not share information about the individual with any other service.

Appendix Six

Ten Pillars of Safeguarding

1. Identity and age verification

It is important that we only allow users onto the platform that are real people that can be identified and prove they are who they say they are. This is critical in cases where an emergency intervention is required, or someone breaches our community guidelines. We require every user to take a selfie of themselves during the sign-up process. This proves they are a real person, but we also use AI technology to estimate the age of the individual. If they are deemed too old or too young to be on our platform, they must complete further steps using photo ID verification or review by a human moderator.

2. Emergency interventions

Users can select the Life Ring button on the home page in order to request help. They are guided through a process that gets them to the best and most appropriate help as quickly as possible. If the child/young adult is in crisis and at risk of harming themselves or others, we will contact the emergency services and provide their physical location using GPS co-ordinates and the What3Words platform.

3. No streaming, no commenting, no judgement

The platform does not provide any livestreaming features so children/young people cannot broadcast live, unmoderated pictures or movies of themselves. We do not allow commenting on stories but do allow users to specify whether a story was relevant to them. This is used to improve their content experience in the app and allows us to show them more content they might like. There are therefore no judgement features within the platform which could result in negative feelings in children/young adults.

4. Privacy settings

Our platform is private by default. When children/young adults join the platform, they choose a username to identify them on the platform, so their real name is never visible to another user. By default, they do not share anything, and nobody else on the platform can see them. They can optionally choose friends to connect with, but they must know their mobile number in order to invite them to connect with them on the platform. We do not access the user's contacts and we do not carry out social graph analysis to offer "friends you might know" features.

5. **Age-appropriate content**

The story feed on the app only displays content that is appropriate to the child/young adult's age band. We use three age bands, 13 to 15, 16 to 17, and over 18. Every piece of content is tagged with the age bands that it is applicable to. In this way we can make sure younger viewers do not see adult content, but we can also ensure that age groups are not shown content that has no relevance to them. For example, a secondary school student will not be interested in university student finance, and conversely a university student will not be interested in GCSE exam tips.

6. **Community guidelines**

We provide strict guidelines to all platform users on what is considered appropriate content and behaviour. Our moderation processes are constantly looking for breaches of the guidelines and will ban repeat offenders from the platform for periods of time, or life. Since users must pass strong verification checks when they sign up this is an effective enforcement strategy.

7. **Pre-moderation**

All public feed content is pre-moderated by the HS editorial team. When user generated content is allowed on the platform it will only be allowed from users who have passed a course on content compliance and will be sample moderated before public release. A "four eyes" approach to content publishing is enforced so that at least two different authorised and qualified members of staff review a content item before it is published.

8. **Post-moderation**

In addition to the reporting features, our platform will also provide two further levels of content and behaviour moderation. HS will use a combination of technical tools and humans to detect under or over age profiles, nudity or other offensive images, emojis with hidden meaning and content that promotes negative behaviours. We monitor chats messages for trigger words that might indicate the child/young adult is at risk of harming themselves or others. A percentage of all chat conversations are also selected for human moderation. Post-moderation ensures inappropriate content is swiftly removed and offenders suspended or banned if necessary.

9. **Community reporting**

Our community members can report content and behaviour that they believe breaches our guidelines or age requirements. HS moderators will swiftly remove content and users that breach the platform guidelines. The identity of the reporter is never shared with the offender.

10. **Limited peer-to-peer interaction**



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HS has very limited opportunity for peer-to-peer communication. Users can only chat to people they have connected with as friends on the platform. They cannot connect to strangers on the platform and strangers cannot follow them or see their journal or private story. There is no commenting on stories to ensure HS is a judgement free environment.

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