



**lifeworks**

Learning disability champions

Lifeworks Charity Limited

## **Safeguarding Children and Child Protection Policy V4.1**

September 2025

Notice to staff using a paper copy of this guidance, Breathe holds the most recent version of this guidance. Staff must ensure they are using the most recent guidance.

Owner: Charity Safeguarding Lead

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## **1.0 Equality, Diversity and Inclusion**

- 1.1 Lifeworks is committed to encouraging equality, diversity and inclusion among our workforce and eliminating unlawful discrimination. The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best. The Charity, in providing services, is also committed against unlawful discrimination of young persons or the public.

## **2.0 Introduction**

- 2.1 Promoting the welfare of children and protecting them from harm is everyone's responsibility under Keeping Children Safe in Education 2025 and Working Together to Safeguard Children 2023
- 2.2 All children without exception have the right to protection from abuse regardless of the child's background, culture, parental or pregnancy status, age, disability, gender, racial origin, religious belief, sexual orientation and/or gender identity. They have the right to participate in an environment which is safe and free from violence, fear, abuse, bullying and discrimination.
- 2.3 Children at Lifeworks have the right to be protected from harm, exploitation, abuse and to be provided with safe environments to live, learn and play. Working in partnership with them, and giving them a voice, alongside their parents and carers and other agencies, is essential to the promotion of their welfare.
- 2.4 Lifeworks is committed to keeping children safe from harm and abuse and will always act in the best interest of the child, working to the above key guiding principles in promoting the welfare and protection of children. The welfare of the child is paramount.
- 2.5 Lifeworks College is committed to teaching our students about safeguarding, ~~including~~ online, through various teaching and learning opportunities, within their curriculum. They are taught to recognise when they are at risk, including online, and how to get help when they need it, providing a safe environment for them to learn in.
- 2.6 Anyone under the age of 18 is defined as a child.
- 2.7 All staff have a responsibility to report an incident of abuse, or suspected abuse of any child living at or involved with Lifeworks and its services. Failure to do so will be treated as a disciplinary issue.
- 2.8 Lifeworks has provided a systematic means of monitoring through internal reporting systems such as CPoms, and regular meetings.
- 2.9 It is expected that all staff (including agency staff and contractors), volunteers and trustees know of the requirements placed on them by this policy and accompanying procedures around safeguarding children at risk and what to do if they have concerns.
- 2.10 Lifeworks will take all necessary actions to prevent and stop any harm and neglect experienced by children, in partnership with statutory agencies, no matter whether that harm or neglect is caused by Lifeworks' staff or other representatives, family or other carers, the general public or other users of Lifeworks' services.

2.11 The Board of Trustees is accountable for ensuring effective safeguarding practices are in place with associated quality assurance. Lifeworks is committed to being a learning organisation and therefore any learning from reviews and quality assurance will be taken forward proactively.

2.12 This policy will be subject to annual review to ensure that the policy and associated procedures remain consistent with Devon, Plymouth and Torbay Safeguarding Partnership procedures, relevant legislation and guidance as well as Charity Commission requirements.

### 3.0 Purpose

3.1 This policy is designed to outline the process required when there has been evidence, allegation or suspicion of abuse, harm, neglect or risk of or actual radicalisation by a young person, member of Lifeworks staff, another young person, or any other person.

### 4.0 Scope

4.1 To provide guidance to staff dealing with allegations of abuse, harm or neglect. This policy also contains information regarding the following:

- Categories of Abuse
- Indicators of Abuse
- Reporting

4.2 Lifeworks recognises that a child is anyone between the ages of 0 and 18, and that regardless of age any child has a right to be safe. Where the child concerned is aged between 16 and 18, Lifeworks will aim to work within the requirements of the Mental Capacity Act 2005 and associated guidance (see Appendix C for further information) whilst recognising that the safeguarding of the child is the priority.

### 5.0 Definitions

For the purposes of this document and avoidance of doubt, the following definitions are adopted from Working Together 2023

5.1 Safeguarding and promoting the welfare of children: Defined for the purposes of this guidance as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home including online.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; ~~and taking action to enable all children to have the best life chances.~~
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

5.2 Child Protection: Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including

online. Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

5.3 Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

## 6.0 Responsibilities

### 6.1 Responsibilities of All Staff

Safeguarding is everyone's responsibility. Everyone employed by or volunteering with Lifeworks is responsible for reporting anything that is, or could potentially be abuse, neglect or the risk of abuse or radicalisation and are responsible for implementing these policies and procedures in association with their line managers and other relevant agencies.

#### 6.1.1 All staff have a responsibility to:

- Maintain an attitude of "it could happen here" in order to remain vigilant to the possibility of abuse and ensure that any and all safeguarding concerns are acted upon in the appropriate manner.
- Be clear about their own role and that of others in providing a caring and safe environment for all children and must know how they should respond to any concerns about an individual that may arise.
- Ensure they are aware of and adhere to this policy and all related policies and procedures listed in the reader information chart of this document.
- Ensure they are familiar with and adhere to all relevant procedures involved in recognising and reporting incidents.
- Ensure they have read and understand the contents of [Working together to safeguarding children 2023: statutory guidance](#) and comply with all regulations.
- All college staff must ensure they have read and understood the contents of Part One and Annex B of Keeping Children Safe in Education [Keeping children safe in education 2025](#) and comply with regulations.
- Report all concerns, without judgement about their significance, to the Designated Safeguarding Lead/ Deputy Designated Safeguarding Lead.
- Adhere to appropriate confidentiality.
- Ensure they fulfil the mandatory safeguarding training and induction requirements.
- Maintain professional relationships with young persons at all times. No attempt should be made to build or encourage any friendship with service users or their families outside of work. This includes telephone and personal contact and connecting via social media.
- Ensure that any and all correspondence with young persons and their families is via Lifeworks systems. Staff must not give their personal contact details to young persons including e-mail, home or mobile telephone numbers.

6.1.2 All staff undertake online safeguarding training as part of their induction and this is updated every 3 years. Staff in each service area attend additional safeguarding training and updates throughout the year.

### 6.2 Responsibilities of the Charity Safeguarding Lead

Lifeworks Charity has an overall Charity Safeguarding Lead who is a member of the SLT.

6.2 1 The Charity Safeguarding Lead has a responsibility to:

- Take ownership of all Safeguarding policies and procedures across the Charity, reviewing and monitoring their implementation.
- Provide six weekly group forum to charity DSLs.
- Circulate updates relating to Safeguarding to the charity DSLs.
- Provide an annual formal report to the Board of Trustees on Safeguarding (including items stated in 6.5.4).
- Undertake an annual safeguarding audit/review alongside key staff, and the Trustee Safeguarding Champion.
- Inform the Senior Leadership Team (SLT), Chair of the Board and the Trustee Safeguarding Champion immediately of any notifiable safeguarding incident and ensure an investigation takes place. A notifiable safeguarding incident in this case includes those incidents which meet criteria and are under further investigation by the Local Authority and incidents which involved emergency services.
- Ensure that the Charity's requirements for external reporting of Safeguarding events are fulfilled.

The Charity Safeguarding Lead undertakes Level 3 Safeguarding training and additional safeguarding management training in order to fulfil their role.

### 6.3 **Responsibilities of the Designated Safeguarding Leads (DSL) and their Deputies**

Each service area (Lifeworks College, Day Services, and Sesame) has a Designated Safeguarding Lead (DSL) who has overall responsibility for child safeguarding in the setting. In the absence of the DSL, the Deputy DSL will undertake the DSL's duties.

6.3.1 The DSL has a responsibility to:

- Liaise with the LA, Social Services, Police and other agencies on individual cases of suspected or identified abuse.
- Ensure the Deputy Safeguarding Lead is up to date in terms of training and is fully involved and supported in decisions made.
- Act as the contact person/s within the service area.
- Be responsible for coordinating action within the service area on safeguarding issues.
- Liaise with staff on a 'need to know' basis so that young person's rights to confidentiality are ensured.
- Represent the service area at safeguarding meetings if required.
- Ensure staff and visitors within the service area are familiar with this policy and procedure.
- Ensure all staff receive regular update training on such current safeguarding issues.
- Ensure the staff team is aware of how to identify and respond to risks to students from extreme or radical views.
- Embed a contextual safeguarding approach within the College, working to ensure that environmental and social factors that may impact upon students' welfare and safety are understood, considered and communicated to any safeguarding partners as necessary.
- Discuss concerns and support colleagues to arrive at effective responses within the confidentiality of the Safeguarding Policy.
- Generate timely safeguarding reports, including the top level report identifying trends.
- Notify the Charity Safeguarding Lead of any incidents requiring further actions within 24 hours via CPOMs for relevant service areas, and via an alert from residential services.

- Call multi-agency Best Interest meetings where appropriate.
- Refer cases to the Channel programme as required, for students who have been identified as being vulnerable to being drawn into terrorism.
- Support staff involved in reporting incidents.
- Refer cases to Lifeworks HR Team where a person is dismissed or has left due to risk/harm to a student to the Disclosure and Barring Service as required.
- Refer cases where a crime may have been committed to the Police as required.
- Attend (as appropriate) Local Authority Designated Officer Support Network meetings.

6.3.2 The DSLs and Deputy DSLs undertake additional safeguarding training modules in order to fulfil their role. The Lifeworks College DSLs undertake additional Multi-agency Safeguarding and Child Protection training in order to fulfil their role.

All safeguarding leads across Lifeworks Charity receive updated training at least every two years.

#### 6.4 Responsibilities of College and Day Services staff

**Understand KCSIE Guidance:** Read and understand *Part One of Keeping Children Safe in Education (KCSIE)*.

**Training & Updates:**

- Complete safeguarding and child protection training (including online safety) at induction.
- Participate in regular refresher training and receive at least annual updates (via email, bulletins, meetings, etc.).

**Awareness of Processes:**

- Know the local early help process and their role within it.
- Understand how to report concerns, make referrals to local authority children's social care.
- Be aware of statutory assessments under the Children Act 1989 (Section 17 – children in need, Section 47 – significant harm) and their role in assessments.

**Responding to Concerns:**

- Know what to do if a child discloses abuse, exploitation, or neglect.
- Maintain appropriate confidentiality – never promise to keep concerns secret.
- Reassure victims that their concerns are taken seriously, they will be supported, and kept safe.

#### 6.5 Responsibilities of the HR Department

The HR Department is a centralised team, based at Head Office, who oversee all recruitment across the Charity.

6.5.1 The HR Team has a responsibility to:

- Ensure that an up-to-date Safer Recruitment Policy is in place and procedures within are followed.
- Ensure that Safeguarding children and child protection is implicit throughout any recruitment process and this commitment is clear to all applicants.
- Complete pre appointment vetting checks
- Ensure that an up to date Single Central Record of DBS checks is maintained at all times.
- Ensure that Safeguarding Policies are readily available to staff and external stakeholders.
- Ensure that the College Leadership manage and monitor the safeguarding training of all staff.

6.5.2 The HR Manager and HR Officer are trained in Safer Recruitment, alongside key management personnel in each service area and oversee the recruitment process of all staff members across the Charity.

## 6.6 Responsibilities of the Board of Trustees

6.6.1 Trustees should proactively safeguard and promote the welfare of their charity's young persons. They must take reasonable steps to ensure that their young persons or others who come into contact with their charity do not, as a result, come to harm.

This should be a key governance priority for Trustees. Trustees are responsible for safeguarding even if certain aspects of the work are delegated to staff. It is therefore essential that trustees:

- Know their responsibilities.
- Have adequate measures in place to assess and address safeguarding risks.
- Have adequate safeguarding policies and procedures appropriate for the charity's particular circumstances and which reflect both the law and best practice.
- Make sure that these policies and procedures are effectively implemented and regularly reviewed.

These steps are vital, given that charities are accountable to the public and must operate for the public benefit. Trustees should be familiar with their responsibilities and the Charity Commission guidance:

[Safeguarding and protecting people for charities and trustees \(last updated June 22\)](#)

6.6.2 There is a clear line of responsibility and accountability in the provision of services within Lifeworks to safeguard and protect the welfare of children, young people and adults at risk. Trustees must be confident that young persons, visitors and staff know who they should contact to report any safeguarding concerns they may have. The Charity Safeguarding Lead directly reports to the Lifeworks Board of Trustees.

6.6.3 Safeguarding is every board member's governance responsibility and in addition there is a nominated trustee safeguarding champion. All trustees are appointed in line with safer recruitment practices and undertake level 2 children and child safeguarding as part of their trustee induction programme. The Board of Trustees safeguarding champion will in addition undertake level 3 safeguarding training.

6.6.4 Trustees have legal responsibility for the organisation's safeguarding arrangements and must be informed of any safeguarding incidents and internal investigations. The safeguarding policy will be regularly reviewed, updated and formally ratified at trustee meetings. This enables the trustees to be able to support the senior leadership and staff teams by continually evaluating the information provided and know when they need to become more involved. This includes:

- Allegations made against the most senior members of staff.
- Ensuring safer recruitment practices are carried out for senior staff.
- Disciplinary proceedings for the most senior members of staff.
- Being notified about any complaints made in relation to safeguarding.
- Investigating any whistleblowing allegations made against the most senior members of staff.
- Undertaking, alongside key staff, annual internal safeguarding audits and reviews.

- Agreeing the organisation's risk management framework including how safeguarding risks will be mitigated.
- Ensuring full investigations are conducted in response to any serious notifiable safeguarding incident in line with Charity Commission, Ofsted and CQC regulations.
- Meeting on an annual basis with the Charity Safeguarding Lead to formally review the previous 12-month number and type of incidents and accidents, investigation responses and outcomes.

The overall governance of Lifeworks is critical to underpinning the foundation and development of good safeguarding practice. Trustees will need to be confident effective safeguarding systems and processes are in place and being followed at all times. Children and child safeguarding policies should be formally reviewed annually, or updated with changes in legislation as they happen.

Safeguarding is an agenda item at every quarterly BOT meeting whereby the SLT will formally report on any incidents or accidents including notifiable safeguarding related incidents, investigations and outcomes. In addition, any notifiable safeguarding incident will be reported immediately by the Charity Safeguarding Lead to the Board safeguarding champion and the Chair of the Board and they will be kept fully informed.

See Appendix C for more information and links from The Charity's Commission on the Board's role in Safeguarding.

## 7.0 Abuse, Neglect and Exploitation

The following definitions and explanations are taken ["What to do if you are worried a child is being abused"](#).

- 7.1 Abuse, neglect and exploitation are forms of maltreatment – a person may abuse, neglect, exploit a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects.
- 7.2 Child welfare concerns may arise in many different contexts, and can vary greatly in terms of their nature and seriousness. Children may be abused or exploited in a family or in an institutional or community setting, by those known to them or by a stranger, including, via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children. In the case of female genital mutilation, children may be taken out of the country to be abused. They may be abused by an adult or adults, or another child or children. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse, neglect and exploitation can happen over a period of time, but can also be a one-off event. These can have major long-term impacts on all aspects of a child's health, development and well-being.
- 7.3 The warning signs and symptoms of child abuse, neglect and exploitation, can vary from child to child. Disabled children may be especially vulnerable to abuse, including because they may have an impaired capacity to resist or avoid abuse and exploitation. They may have speech, language and communication needs which may make it difficult to tell others what is happening. Children also develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse, neglect, and exploitation, so you should also be alert to parent-child

interactions which are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health. By understanding the warning signs, you can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

7.4 There are a number of warning indicators which might suggest that a child may be being abused or neglected. (Keeping Children Safe in Education (September 2025) Paragraphs 24 - 29).

Some of the following signs might be indicators of abuse or neglect:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

7.5 There are four main categories of abuse and neglect: physical abuse, emotional abuse, sexual abuse and neglect. Each has its own specific warning indicators, which you should be alert to. Working Together to Safeguard Children (2015) statutory guidance sets out full descriptions.

## 7.6 **Physical abuse**

Physical abuse is deliberately physically hurting a child. It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child.

Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where prevent happens.<sup>1</sup> Babies and disabled children also have a higher risk of suffering physical abuse.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or

deliberately induces, illness in a child. Physical abuse can also occur outside of the family environment.

**Some of the following signs may be indicators of physical abuse:**

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones;
- Children with unexplained:
  - Bruises or cuts;
  - Burns or scalds; or
  - Bite marks.

## 7.7 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development.<sup>2</sup>

Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be in a position to observe it, for example, in the way that a parent interacts with their child. Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate. It may include not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

Emotional abuse may involve serious bullying – including online bullying through social networks, online games or mobile phones – by a child's peers.

**Some of the following signs may be indicators of emotional abuse:**

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

## 7.8 Sexual Abuse

**Sexual abuse** is any sexual activity with a child. You should be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long-term impact on mental health.

Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can commit acts of sexual abuse, as can other children.

**Some of the following signs may be indicators of sexual abuse:**

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

## 7.9 Child on child abuse

All college and day service staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe 8 Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse').
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>11</sup> (also known as sexting or youth produced sexual imagery).
- Upskirting<sup>12</sup> which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and;
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online

element)

## 7.10 Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)

CSE: The statutory definition of Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) can be found in the guidance document Child sexual exploitation: See KCSIE (2024) paragraph 38 – 40. Child sexual exploitation is a form of child sexual abuse. It occurs where an adult male or female 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. **CSE includes young people aged 16 and 17 who are over the age of sexual consent.**

**Indicators of child sexual exploitation may include:**

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation.
- Gang-association and/or isolation from peers/social network.
- Exclusion or unexplained absences from school, college or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours.
- Self-harm or significant changes in emotional wellbeing.

**Potential vulnerabilities include:** (Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.)

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability • Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Sexual identity.

More information can be found in: Child sexual exploitation: Definition & guide for practitioners (DfE 2017).

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late;
- Children who regularly miss school or education or do not take part in education;
- Children who have been exploited will need additional support to help maintain them in education.

It is recognised that some children will suffer multiple forms of abuse, such as criminal exploitation, sexual exploitation and county lines.

**‘County Lines’ is:** County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Several indicators for children involved in county lines are detailed above, for CSE and CCE.

Exploitation is an integral part of the county lines offending model with children exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

**Child sexual exploitation** is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

**Some of the following signs may be indicators of sexual exploitation:**

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation; Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant; Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and Children who regularly miss school or education or don't take part in education.

## 7.11 Neglect

Neglect is a pattern of failing to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of a child's health or development.

Children who are neglected often also suffer from other types of abuse. It is important that practitioners remain alert and do not miss opportunities to take timely action.<sup>3</sup> However, while you may be concerned about a child, neglect is not always straightforward to identify.

Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child.

Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

### **Some of the following signs may be indicators of neglect:**

- Children who are living in a home that is indisputably dirty or unsafe; Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm
- Children who fail to receive basic health care<sup>4</sup>; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

## **8 Record Keeping and Sharing**

Sharepoint: Individual safeguarding records, the Safeguarding Log and historic Safeguarding Records are held securely on Sharepoint with access being restricted to the DSLs and Senior Management Team.

CPoms: Student safeguarding incidents from 2022 academic year onwards are noted within the individual student record on the CPoms system. Each student's safeguarding record contains a chronological summary of significant events and the actions and involvement of the college.

### **8.1.1 Transfer of safeguarding records**

When a student leaves the Lifeworks, consideration will be given to the student's wishes and feelings about their safeguarding / child protection information being passed on, in order that the receiving organisation can provide appropriate support. Due consideration must be given to the sharing of any additional information and any such requests from the receiving establishment. If there is an existing risk management plan/assessment in place for behaviours that are deemed potential harmful to the student or others (i.e. self-harming or harmful sexualised behaviour), the risk management plan/assessment must be shared with the destination provision prior to the student starting, so that appropriate care and control measures can be put in place to mitigate the potential of any risk of further harm occurring.

Student records should be transferred in a secure manner. A receipt of file transfer should be obtained for audit purposes. If sending by post, records should be sent, "Special Delivery". A note of the special delivery number should also be made to enable the records to be tracked and traced via Royal Mail. Electronic transfer should be secure, e.g. password protected documents, with passwords shared in a separate email to the document transfer. For audit purposes a list of the names of all those whose records

are transferred and the name of the organisation they are transferred to must be made and a signature obtained from the receiving organisation as proof of receipt. Likewise, a note of all records received should be kept. Records will be kept in the student's individual file. This will include where and to whom the records have been sent, or from whom they have been received, the date sent and/or received.

#### **8.1.2 Archive of safeguarding records:**

When a student leaves the Lifeworks, we will retain the student's safeguarding record in electronic format as an archived record in accordance with the Data Retention Policy.

#### **8.1.3 Student and Parent access to safeguarding records:**

Student's and parents' access to child protection and/or safeguarding files: Under the Data Protection Act 2018, a student or their nominated representative has the legal right to request access to information relating to them. This is known as a subject access request. Therefore it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner. Any student who has a safeguarding file has a right to request access to it. The student's parent may only have access to records in accordance with the Mental Capacity Act legislation. However, neither the student nor the parent has an automatic right to see all the information held. Information can be withheld if disclosure could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the student or another person, could reveal that the student or another person has been a subject of or may be at risk of abuse, or if the disclosure is not in the best interests of the student, likely to prejudice an on-going criminal investigation, or if information about the student also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the Local Authority.

Reports are available to the student unless the exceptions described above apply. If an application is made to see the whole record, advice should be sought from the Charity Safeguarding Lead and Trustee.

8.1.4 Safe Destruction of the student record: Student data will be retained or destroyed in accordance with the Lifeworks Data Retention Policy. Where records have been identified for destruction, they should be disposed of securely at the end of the academic year (or as soon as practical before that time). Records which have been identified for destruction should be confidentially destroyed. This is because they will either contain personal or sensitive information, which is subject to the requirements of the Data Protection Act 2018 or they will contain information which is confidential to college or the Local Education Authority. Information should be shredded prior to disposal or confidential disposal can be arranged through private contractors. For audit purposes the college should maintain a list of records which have been destroyed and who authorised their destruction.

## **9.0 Specific Safeguarding Policies and Procedures**

### **9.1 Safeguarding children in an adult setting**

This organisation is aware of its obligations under the [Health and Social Care Act 2008 \(Regulated Activities\) Regulations 2010](#) to protect and safeguard children visiting, or in other ways related to, our adult settings.

Refer to our Safeguarding Children in Adult Settings policy. This policy sets out the responsibilities of staff concerning any allegation of abuse involving children that may be witnessed by staff whilst in the employ of this organisation. We are committed to working in partnership with other multi-agency partners so that the protection and safeguarding of children is consistent with current policy and guidance.

### **9.2 Safeguarding Adults**

This organisation is aware of its obligations to protect and safeguard adults within our Further Education College, Sesame and Day Services.

Refer to our Adult Safeguarding Policy for responsibilities and procedures relating to adults at risk.

### 9.3 Prevent and Radicalisation

The overall aim of our counter-terrorism strategy, CONTEST is to reduce the risk from terrorism to the UK, its citizens and interests overseas, so that people can go about their lives freely and with confidence. Prevent remains one of the key pillars of CONTEST, alongside the other three 'P' work strands:

- Prevent: to stop people becoming terrorists or supporting terrorism
- Pursue: to stop terrorist attacks
- Protect: to strengthen our protection against a terrorist attack
- Prepare: to mitigate the impact of a terrorist attack

As part of the Counter Terrorism and Security Act 2015, Lifeworks has a duty to prevent people being drawn into terrorism and supporting terrorism. This has become known as the 'Prevent Duty'. Prevent deals with all kinds of terrorist threats to the UK. It is necessary to ensure that all Prevent delivery and activity is guided by the threat, decision making within the Home Office's Homeland Security Group and Counter Terrorism Policing is informed by the Security Threat Check (STC).

This organisation is aware of its obligations to protect our stakeholders from risk of radicalisation and of the Prevent duty.

Refer to our Prevent and Radicalisation Policy for responsibilities and procedures relating specifically to radicalisation.

### 9.4 Female Genital Mutilation (FGM)

This organisation is aware of its obligations to protect our stakeholders from risk of FGM. [Mandatory reporting of female genital mutilation: procedural information \(accessible version\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/442222/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version.pdf)

Refer to our FGM Policy for responsibilities and procedures relating specifically to this form of abuse.

### 9.0 The Mental Capacity Act 2005

The MCA starts with the presumption that, from the age of 16, we can make our own decisions – including about our safety and when and how services intervene in our lives. People must be assumed to have the capacity to make their own decisions and be given all practicable help to make a specific decision before anyone treats them as not being able to make their own specific decision. Where a child is found to lack the capacity to make a decision then any action taken, or any decision made on their behalf, must be made in their best interests.

Professionals and other staff need to understand and always work in line with the Mental Capacity Act 2005 (MCA). They should use their professional judgement and balance many competing views. They will need considerable guidance and support from their employers if they are to help young people manage risk and put them in control of decision making if possible.

Regular face-to-face supervision from skilled managers is essential to enable staff to work confidently and competently in difficult and sensitive situations.

Mental capacity is frequently raised in relation to safeguarding. The requirement to apply the MCA in safeguarding enquiries for young people of 16 and 17 years of age challenges many professionals and requires utmost care, particularly where it appears a young person has the capacity for making specific decisions that nevertheless places them at risk of being abused or neglected.

The MCA created the criminal offences of ill-treatment and willful neglect in respect of people who lack the ability to make decisions. The offences can be committed by anyone responsible for that child's care and support, such as paid staff but also family carers as well as people who have the legal authority to act on that child's behalf (i.e. persons with power of attorney or court-appointed deputies).

These offences are punishable by fines or imprisonment. Ill-treatment covers both deliberate acts of ill-treatment and also those acts which are reckless which results in ill-treatment. Willful neglect requires a serious departure from the required standards of treatment and usually means that a person has deliberately failed to carry out an act that they knew they were under a duty to perform.

Abuse by an attorney or deputy: If someone has concerns about the actions of an attorney acting under a registered enduring power of attorney (EPA) or lasting power of attorney (LPA), or a deputy appointed by the Court of Protection, they should contact the Office of the Public Guardian (OPG). The OPG can investigate the actions of a deputy or attorney and can also refer concerns to other relevant agencies. When it makes a referral, the OPG will make sure that the relevant agency keeps it informed of the action it takes. The OPG can also make an application to the Court of Protection if it needs to take possible action against the attorney or deputy. Whilst the OPG primarily investigates financial abuse, it is important to note that it also has a duty to investigate concerns about the actions of an attorney acting under a health and welfare LPA or a personal welfare deputy. The OPG can investigate concerns about an attorney acting under a registered EPA or LPA, regardless of the child's capacity to make decisions.

See Appendix C for further information about the MCA.

## **10.0 Recruitment and Disclosure**

- 10.1 Lifeworks recruitment is always conducted in accordance with Safer Recruitment procedures. Every interview panel has at least one member who is Safer Recruitment trained. Once an offer of employment has been made, Lifeworks Charity will apply for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's or Childs Barred List and to obtain other relevant suitability information.

The DBS issues the DBS disclosure certificate to the subject of the check only, rather than to Lifeworks. It is a condition of employment with Lifeworks Charity that the original disclosure certificate is provided to the HR Team as soon as is practical after the certificate is received. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the HR Team.

10.2 Additional pre-employment checks (verification of identity, address and qualifications; references) are carried out as well as (where relevant to the role) checks on prohibition from teaching, EEA Sanction, prohibition from management and childcare disqualification. While Disqualification by Association no longer applies, it remains the case that the relationships and associations that staff have in work and outside (including online) may have an implication for the safeguarding of young persons and as such there is an expectation that staff will speak to their DSL promptly if any such situation should arise. Please refer to our Recruitment & Selection Policy for full details.

## **11.0 Dissemination of policy and procedures**

11.1 As identified in this policy all new staff and volunteers, including any new member of the Board of Trustees, will be required to be familiar with the policy as part of their induction. At mandatory induction all staff are issued with a copy of this policy and given the appropriate time and opportunity to read and digest it, then sign an acknowledgement record to confirm this. The inductee's understanding of the policy and operating procedures will be checked and formally confirmed by their line manager as part of their mandatory training completion and record.

11.2 All practitioners will also undertake Level 2 E-Learning Awareness of Safeguarding Children, Multi-Agency Safeguarding & Child Protection and A2: Level 2 Mental Capacity Act & Deprivation of Liberty Safeguards within week one of their induction.

11.3 In addition to being covered as part of the Induction process this policy will be revisited as part of probation objectives/ supervision/ annual appraisal system to ensure that all staff remain familiar with its contents as well as safeguarding being a standing agenda item on individual supervision and regular staff and Board meetings. Any changes to this policy will be formally cascaded to staff and reinforced in individual supervision meetings.

11.4 Where required the policy will be available in different formats to make it more accessible.

11.5 External contractors will be required to commit to work within the scope of this policy.

11.6 In every service the contact details for the Designated Person and Deputy Person will be displayed prominently.

## **12.0 Visitors/External Service Providers**

Risk assessments are carried out as necessary for visitors or external service providers. Upon arrival, all visitors to the service areas are provided with key safeguarding information and asked to provide confirmation of identity if being left unsupervised by a member of our staff.

## **13.0 Working with families**

Keeping relevant, up-to-date and accurate information about our young persons is a key aspect of effective safeguarding. We will regularly ask all families to provide us with the following information, where relevant to the individual, and to notify us of any changes that occur:

- Names and contact details of persons with whom the young person normally lives.
- Names and contact details of all persons with parental responsibility.
- Names and contact details of emergency contacts for the young person.
- Details of transport arrangements in place (if different from above).
- Any relevant court orders in place including those which affect any person's access to the young person (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.).

- Name and contact detail of the young person's general practitioner.
- Any other factors which may impact on the safety and welfare of the young person.

Information about the young person given to us by the young person themselves, their parents or carers, or by other agencies will remain confidential. Staff will be given relevant information only on a "need to know" basis in order to support the young person if that is necessary and appropriate.

We are, however, under a duty to share any information which is of a child protection or safeguarding nature, as noted in Keeping Children Safe in Education, which states "The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children." We understand that information sharing in this context is in the best interests of the young person and overrides any other duties we have regarding confidentiality and information sharing.

We have a duty to keep any records which relate to child protection/safeguarding work undertaken by us or our partner agencies and to ensure that these are kept apart from the main young person's record, stored securely and only accessible to key members of staff. We also have a duty to send copies of these records to any other provider to which the young person transfers.

If we have a reason to be concerned about the welfare of a young person we will always seek to discuss this with their family in the first instance, subject to the conditions laid out in our Safeguarding Procedure. On occasion, according to the nature of our concern, it may be necessary for us to make an immediate referral to social care services when to do otherwise may put them at risk of further harm either because of delay, or because of the actions of parents or carers.

## 14.0 Online Safety

Use of the Internet and other technologies generates significant opportunities for people with learning disabilities to enhance the accessibility of communication with friends, parents/carers, other learning providers, community activities and employers.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole college approach to online safety should educate students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

**content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

**contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**conduct:** online behaviour that increases the likelihood of, or causes, harm; for example,

making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying

**commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Lifeworks has a clear responsibility to recognise the benefits of technology and the opportunities they present, and to support our young persons to be able to safely navigate the digital world.

The College promotes safe use of technology and ensures that the use of ICT is embedded throughout the curriculum. Our assessments are rigorous and pinpoint what resources and learning materials a student will require in order to fully access our curriculum.

The DSL has responsibility to ensure that additional checks to filtering and monitoring need to be informed by a review process so that Trustees and Senior Leaders have assurance that systems are working effectively and meeting safeguarding obligations.

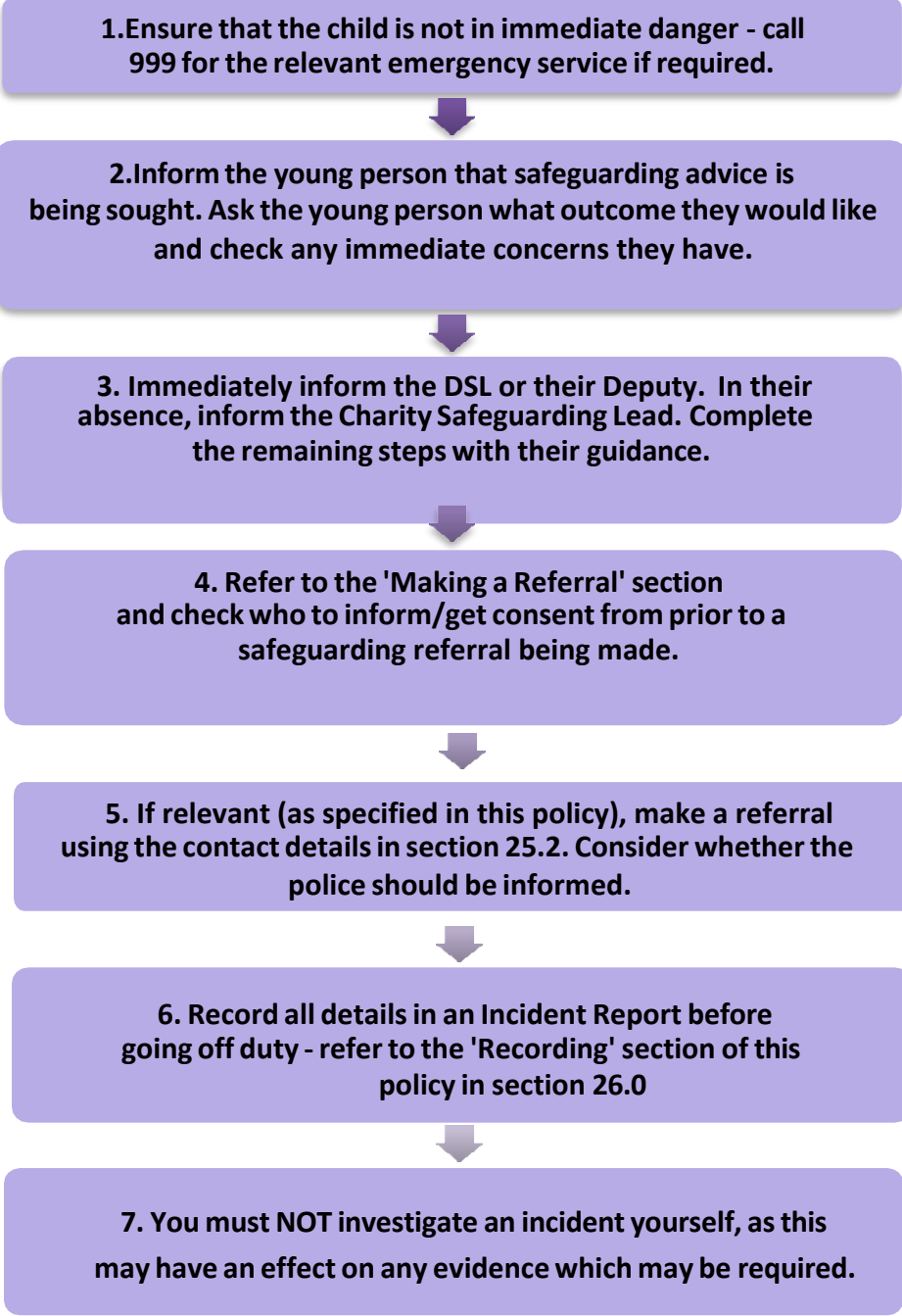
Refer to the colleges Online safety policy which includes appropriate filtering and monitoring on school devices and school networks and Department for Education publication: Generative AI: product safety expectations to support schools to use generative artificial intelligence safely.

## **15.0 Safeguarding Disabled Children**

This policy has been cross-referenced with the practice advice included in 'Safeguarding Disabled Children Guidance 2009' which makes clear that disabled children have exactly the same human rights to be safe from abuse and neglect and to be protected from harm as non-disabled children. Lifeworks recognises that disabled children do however require additional action. This is because they experience greater and created vulnerability as a result of negative attitudes about disabled children and unequal access to services and resources, and because they may have additional needs relating to physical, sensory, cognitive and/ or communication impairments. The 'Guidance for professionals' section of the document is presented in full in appendix D and should be read by staff who work with young people at Lifeworks.

## **16.0 Immediate Actions in the event of a Child Safeguarding Concern Flowchart**

The flowchart below provides a summary of the key steps to take in the event of a child safeguarding incident. Each step is explained more fully in the sections that follow.



## **17.0 What to do in the case of immediate danger**

- 17.1 If there is an immediate risk to life, serious injury or there is the suggestion that a criminal act has been committed the Police should be contacted as a matter of urgency on 999. Criminal investigation by the Police will take priority over all other lines of enquiry.

If staff initially encounter a situation that warrants emergency attention, they should inform their Designated Safeguarding Lead as soon as the immediate danger has been mitigated.

### **17.2 Preserving evidence**

Where possible steps should be taken to preserve and record any physical evidence of abuse, however it is recognised that at times this may not be possible due to the traumatic nature of what is presented.

In cases of physical or sexual assault only touch what you have to and wherever possible leave things as they are. The abused person should be advised not to wash or remove clothing. You should also preserve anything that is used to comfort the person (e.g. blankets).

## **18.0 How to respond to an allegation (disclosure) or risk of harm**

- 18.1 If a young person discloses harm to any staff member it must be remembered that the staff member's role is to recognise and refer abuse, not to investigate. This is to avoid contamination of evidence gained in any subsequent investigation undertaken by Police &/or Children's Services and to ensure that the person is not placed in the stressful position of having to repeat their story over and over again.

'Not investigating' does not mean that the staff member receiving the concern cannot ask any questions. However, careful thought needs to be given to how and what questions are asked, avoiding anything that can be interpreted as 'leading' the young person. The basic rule of thumb is that staff should ONLY ask enough questions of them to clarify whether there is a safeguarding concern. Once the person has clarified that they are being harmed or are at risk (or the staff member is reassured that they are safe), no further questions are required.

If a young person presents with an injury accompanied by a clear allegation that they have been harmed, or makes a clear sexual allegation it should not be necessary to question the child other than perhaps to clarify who was involved and when an incident took place. The young person should be listened to actively and their story carefully recorded. In this situation the staff member should ensure immediate information sharing with the Designated Safeguarding Lead (or Deputy DSL in DSL's absence). It is likely that such a scenario will require immediate consultation about action to be taken and an urgent referral will be necessary.

In other situations where the young person appears to be making a possible allegation or has a suspicious injury, it is reasonable to ask open, non-leading questions in order to establish details. Examples of questions are. "That's a nasty bruise, how did it happen?; Tell me about what happened?; You seem a bit upset and I'm worried about you, is anything troubling you?; Can you tell me more about that?" You may wish to use the acronym 'TED' as a reminder that the person can be encouraged to 'Tell', 'Explain' and 'Describe' the concern. If it is necessary to seek further clarification, staff should keep to open questions such as What? When? Who? How? Where? It is important to remember that questions should only be asked to help clarify whether the person is at risk of harm.

Once clarification is achieved, no further questions should be asked.

## **18.2 Confidentiality and Sharing of Information (Sharing information Policy)**

Where an allegation has been made, staff must let the child know the position regarding their role and what action they will have to take as a result. In the first instance, this will be to inform the DSL and seek advice. Staff, volunteers and trustees have a professional responsibility to share relevant information about the protection of children at risk with other professionals, particularly investigative agencies and child social services.

All personal information regarding a child at risk will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines. Records will only record details required in the initial contact form.

If a child confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the child sensitively that he or she has a responsibility to refer cases of alleged abuse to the DSL and appropriate agencies.

Within that context, the child must, however, be assured that the matter will be disclosed only to people who need to know about it and be asked what they would like to be the outcome.

In the case of a young person aged 16 or 17, where possible, consent should be obtained from the child before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the child at risk is the priority. Decisions will need to be made about the young person's capacity and whether it is possible for them to give consent.

Staff must assure the child that they will keep them informed of any action to be taken and why. The child's involvement in the process of sharing information must be fully considered and their wishes and feelings taken into account.

## **19.0 Who to inform about a safeguarding concern**

- 19.1 The Designated Safeguarding Lead or their Deputy will discuss the concerns and help to form a view as to the next steps. This may include contacting the Police, referring to the local Safeguarding Children's Service or making a record of the concern. Such decisions and reasons for the decision must be recorded and signed. The DSL will take the lead on phone calls to the Safeguarding Boards.
- 19.2 The DSL has access to the safeguarding chronology of individual young persons and so is able to use this knowledge to build a full picture of the situation. They are also trained to a higher level of knowledge in safeguarding and therefore are best placed to support staff members in determining next steps. However, if the staff member is concerned that the suggested outcome will put the child at further risk, they have a duty to escalate their concerns to the Charity Safeguarding Lead.

### 19.3 Internal Contacts

Role	Site	
	College and Day Services	Sesame
Designated Safeguarding Lead	Emma Pindard	Amanda Percival
Deputy Designated Safeguarding Lead	Lesley Newham	Fran Spink
Charity Safeguarding Lead	Karen Dorow	
Trustee Safeguarding Champion	Andrew Vaughan	
Whistleblowing Officer	Operations Manager (Paul Clarkson, Chair of the Board in the case of an allegation against CMT)	

### 20.0 Making a Referral

#### 20.1 Notifying Parents/Carers

Lifeworks will normally seek to discuss any concerns about a young person with their parents/carers. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or allegation. However, if the staff involved believe that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's MASH, e.g. familial sexual abuse.

Where there are concerns about forced marriage or honour-based violence, parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk. In some circumstances it would be appropriate to contact the police.

#### 20.2 Gaining Consent for a Referral

It is the responsibility of the DSL or leading staff member to speak to the child/young person about their concerns before making an enquiry. Children have the same data protection rights as adults over their personal data and can exercise those rights, including being asked for their own consent, as long as they are competent to do so.

If the child or young person is under the age of 13 or is not considered competent, consent should still be sought from a parent or person with parental responsibility to exercise their rights on their behalf, unless this puts the child/young person at risk of harm.

#### 20.03 Making a Referral: Contact Details

For children who live in the Devon Council boundary – Devon Multi-Agency Safeguarding Hub (MASH) can be contacted to make a referral on:  
<https://www.devon.gov.uk/educationandfamilies/child-protection/>

- For children who live in the Torbay Council boundary – Torbay Multi-Agency Safeguarding Hub can be contacted to make a referral on: <http://torbaysafeguarding.org.uk/professionals>.
- For children who live in the Plymouth Council boundary- Plymouth Safeguarding Children Partnership can be contacted to make a referral on: <https://plymouthscb.co.uk/making-a-referral/>
- For children who live in the Cornwall Council boundary – Multi-Agency Referral Unit (MARU) can be contacted to make a referral on: <https://www.cornwall.gov.uk/health-and-social-care/childrens-services/child-protection-and-safeguarding/>

Each council's website has links to the consultation lines, online referrals, email addresses and out of hours numbers for MASH.

### **Out of normal working hours**

The Out of Hours Duty Teams for the respective area should be contacted: Devon – 0345 6000 388  
Torbay – 0300 456 4876  
Cornwall – 01208 251 300

### **Contacting the Police**

If a crime has been, or may have been, committed, the matter should be reported to the police who will then lead an investigation. In the case of an emergency and immediate risk, this should be via 999. Where there is no immediate risk, the relevant Safeguarding Board (see 25.2 for contact details) can advise on police involvement.

## **21.0 Recording and Reporting**

### **21.1 Recording**

It is important to build a chronology of any safeguarding concerns or observations– whether referred or not – to aid the DSL and other agencies in understanding the full picture when making decisions. Therefore, **all** concerns should be logged and passed to the DSL, no matter how insignificant they may seem.

Following a safeguarding incident or allegation, an accurate record should be made using the Lifeworks Incident Reporting Form (Appendix A). This must be completed and forwarded to the DSL before the end of your shift. The form includes:

- The date and time of the incident and location.
- Details of the alleged abuser, if known.
- Details of the suspected abuse or neglect or what has been reported to you. Use factual information, use the young person's own words.
- The appearance and behaviour of the alleged victim, including any injuries. Use a body map to record the location of any injuries.
- All actions you have taken, including those to secure the wellbeing of the young person and who you have notified of the safeguarding incident.
- Whether you have made a referral.

The DSL should ensure that a copy of the form is attached to the young person's safeguarding record. In the case of a referral made by telephone, a copy should be sent to the Safeguarding Board or police (where relevant) no more than 24 hours after the telephone conversation.

## 21.2 Reporting to Stakeholders

In addition to reporting the incident to the DSL, significant safeguarding incidents must be reported by the DSL or Charity Safeguarding Lead to Lifeworks' external stakeholders.

The Charity Safeguarding Lead should immediately inform the SLT, the Chair of the Board and the Trustee Safeguarding Champion of any significant safeguarding incidents. They should also present a quarterly update to the Board of all safeguarding concerns. Safeguarding is a standing item on all SLT/Service Area Management meeting agendas.

## 22.0 Allegations Against Staff

- 22.1 All staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- 22.2 Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction.
- 22.3 We understand that a young person may make an allegation against a member of staff or staff may have concerns about another staff member. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform their DSL.
- 22.4 The DSL must alert the LADO (Local Authority Designated Officer) to 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 children, or related to a child
  - Behaved towards a child or children in a way that indicated they may pose a risk of harm to children.

The DSL on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) at the earliest opportunity and always within one working day and before taking any further action.

Allegations of historical abuse should be responded to in the same way as contemporary concerns. In such cases, it is important to find out whether the person against whom the allegation is made is still working with children and if so, to inform the person's current employer or voluntary organisation or refer their family for assessment.

Where a child from another Local Authority Area is involved, the lead responsibility for action lies with the local authority for the area where the alleged abuse occurred where there is most organisational risk. Therefore, any such incidents at Lifeworks College should be reported to Devon LADO on 01392 384964 and accompanied by a completed referral form which can be found here: <https://www.devon.gov.uk/educationandfamilies/child-protection/managing-allegations-against-adults-working-with-children/>

22.5 If the allegation made to a member of staff concerns the DSL, the person receiving the allegation will immediately inform the Charity Safeguarding Lead who will consult the LADO as above.

22.6 It is essential that any allegation of abuse made against a person who works with vulnerable children, including those who work in a voluntary capacity, is dealt with fairly, quickly and consistently, in a way that provides effective protection for the vulnerable child and, at the same time, supports the person who is the subject of the allegation.

22.7 Staff or volunteers should not:

- Attempt to deal with the situation themselves
- Make assumptions, offer alternative explanations or diminish the seriousness of the behaviour or alleged incidents
- Keep information to themselves or promise confidentiality
- Take any action that might undermine any future investigation or disciplinary procedure (e.g. interviewing the alleged victim or potential witnesses, or informing the alleged perpetrator, parents or carers).

22.8 The DSL/registered manager should ensure that the subject of the allegations is:

- Advised at the outset to contact her/his union or professional association;
- Treated fairly and honestly and helped to understand the concerns expressed, processes involved and possible outcomes;
- Kept informed of the progress of the case and of the investigation;
- Clearly informed of the outcome of any investigation and the implications for disciplinary or related processes;
- Provided with appropriate support (via occupational health or employee welfare arrangements where these exist);
- (If suspended) kept informed about workplace developments.

An investigation will not be seen as an assumption of guilt.

22.9 In order for the matter to be fully investigated, and to ensure that that the young person and the staff member receives equal protection, the staff member may be suspended on full pay until the investigation is complete. The duration of the suspension will be as short as possible.

22.10 It is accepted that the employee may feel isolated and every effort will be made to give them appropriate assistance. If the outcome of the investigation is that there is no case to answer, then the employee should be sensitively inducted back to work and given the appropriate support by their Line Manager. Consideration should also be given to the ongoing relationship between the young person and the member of staff.

### **23.0 Whistleblowing**

23.1 We recognise that young people cannot be expected to raise concerns in an environment where staff fail to do so.

23.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the charity's safeguarding arrangements. In

this instance, staff should follow the procedures in the Whistleblowing policy.

- 23.3 The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **24.0 Monitoring compliance**

1. All reports of abuse, neglect or radicalisation will be monitored as appropriate, and evaluated and reviewed on a regular basis, at least every year by the Lifeworks Safeguarding Steering Group. This includes the Charity Safeguarding Lead, and the Trustee Safeguarding Champion. Following evaluation information being submitted to the Board, actions can be recommended to reduce potential for future occurrences. The effectiveness of the policy will also be evaluated against all case studies as part of the review. As part of this review, completed cases will be evaluated to see how they have been handled.
2. The HR Team manage and monitor the safeguarding training of all staff using a training matrix. This information is recorded in staff personnel files.
3. Supervisors ensure that the mandatory safeguarding training has been completed by new employees and that all safeguarding policies have been read and understood. Safeguarding knowledge and queries, alongside expectations of training, are discussed and recorded at supervision and as part of the appraisal process.
4. The DSL of each service area undertakes 'spot-check' monitoring of staff knowledge and implementation of safeguarding policies and procedures. Outcomes of these spot-checks are discussed during group supervision with the Charity Safeguarding Lead.
5. The Charity Commission includes in its Annual Return a statement, which trustees must make, confirming that there have been no serious incidents in the relevant period that have not been reported previously. It can constitute an offence to make a false statement in this document and trustees who have – however unwittingly – allowed an employee to submit a return without making proper enquiry on this point can find themselves in an uncomfortable position.

Given the Commission's current "no tolerance" approach to regulatory failings of a serious nature, the general advice is to submit a serious incident report if in doubt as to whether one is warranted or not, and to do so promptly.

[How to report a serious incident in your charity](#)

[Deciding what to report](#)

## Appendix A1: Lifeworks Safeguarding Incident Form

Staff, volunteers and regular visitors are required to complete section A and give it or email it to the DSL or Deputy DSL if they have a safeguarding concern about a person in our service area.

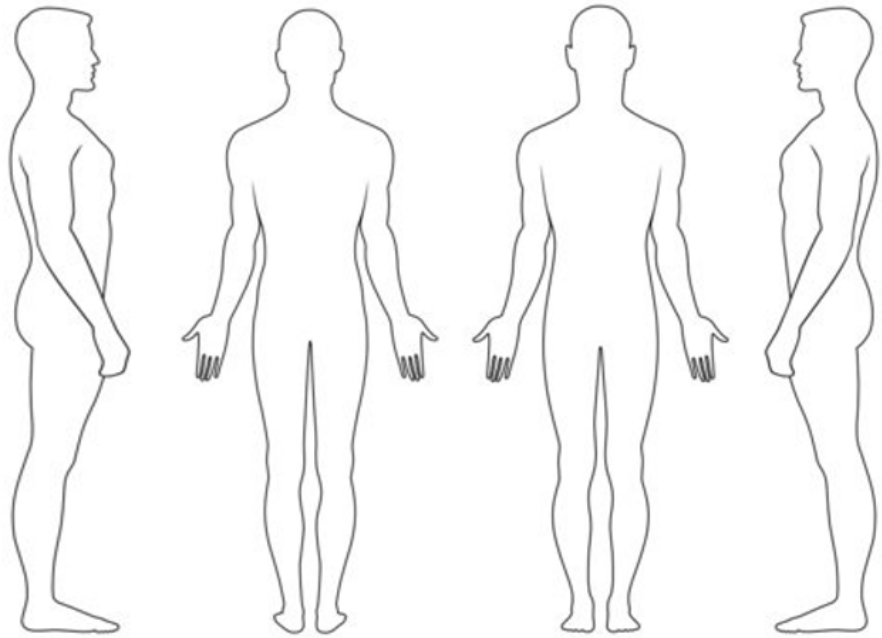
SECTION A: To be completed by person who is reporting the concern	
Information Required	Enter Information Here
Name of person completing the form	
Your Signature	
Job role	
Date of occurrence	
Time of occurrence	
Full name of person involved	
Date of birth	
Gender	
Witness if any	
Incident Details <i>Please include where you were when the person made a disclosure, what you saw, who else was there, what did the person say or do and what you said.</i>  <i>Ensure that if there is an injury this is recorded (size and shape) and a body map is completed</i>  <i>[Make it clear if you have a raised a concern about a similar issue previously]</i>	

Incident Details contd.

Body Map

Describe any injury that was sustained during the occurrence, including what type of injury, where it is, how big it is, what first aid measures were needed, if medical intervention was needed. Also, mark the location and proportion of the injury on the body chart.

Use the body chart for any unexplained or unwitnessed injury



**SECTION B: To be completed by DSL**

Time form received by DSL	
Nature of concern/disclosure	
Parents/Carers Informed [yes/no, date and time]	
Referral made to police [yes/no, date and time]	
Referral Made to Other Agency [yes/no, date and time, name of organisation]	
Feedback given to young person [yes/no, date and time]	
Feedback given to pastoral team/key worker [yes/no, date and time]	
Feedback given to person who recorded disclosure [yes/no, date and time]	
Full Name of DSL	
Signature of DSL	
Date of Signature	

## Policy Information Chart

<b>Title</b>	Safeguarding Children and Child Protection Policy V4.1
<b>Document purpose/summary</b>	The purpose of this policy is to provide clear guidance for all Lifeworks staff on how to identify, raise concerns and respond to safeguarding matters affecting children by implementing this procedure.
<b>Owner</b>	Safeguarding Lead
<b>Policy Department</b>	Safeguarding
<b>Ratification date</b>	September 2025
<b>Review date and frequency</b>	Annually, or earlier if there is a change in evidence
<b>Consultation process</b>	SLT
<b>Ratified by</b>	BOT
<b>Target audience</b>	All Lifeworks Staff and Trustees
<b>Circulation</b>	Electronic: Intranet Written: Upon request to the Policies Administrator Please contact the Policy Administrator if you require this document in an alternative format.
<b>Equality analysis checklist completed</b>	Yes
<b>References/ sources of information</b>	<p>Working Together to Safeguard Children 2018, 2023 update  <a href="https://www.gov.uk/government/publications/working-together-to-safeguard-children--2#full-publication-update-history">https://www.gov.uk/government/publications/working-together-to-safeguard-children--2#full-publication-update-history</a></p> <p>Children who run away or go missing from home or care  <a href="https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care">https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care</a></p> <p>Keeping Children Safe in Education DfE 2025  <a href="https://www.gov.uk/government/publications/keeping-children-safe-in-education--2">https://www.gov.uk/government/publications/keeping-children-safe-in-education--2</a></p> <p>Safeguarding Disabled Children Guidance 2009  <a href="https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance">https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance</a></p> <p>Mental Capacity Act 2005  <a href="https://www.legislation.gov.uk/ukpga/2005/9/contents">https://www.legislation.gov.uk/ukpga/2005/9/contents</a></p> <p>Education Act 2002  <a href="https://www.legislation.gov.uk/ukpga/2002/32/section/175">https://www.legislation.gov.uk/ukpga/2002/32/section/175</a></p> <p><a href="#">Health and Care Act 2022</a></p>

	<a href="#">Home - Torbay Safeguarding Children Partnership</a> <a href="#">Safeguarding Vulnerable Groups Act 2006</a> <a href="#">Mandatory reporting of female genital mutilation: procedural information (accessible version) - GOV.UK (www.gov.uk)</a>
<b>Associated documentation/cross referenced policies</b>	Accessible Information Behaviour that Challenges, Violence and Aggression Confidentiality Data Protection Legislative Framework (GDPR) Deprivation of Liberty Safeguards Female Genital Mutilation Mental Capacity Act 2005 Radicalisation and PREVENT Safer Recruitment Record Keeping Safeguarding Adults Safeguarding Children in a Child Setting Whistleblowing
<b>Supersedes document</b>	College/Community Safeguarding Children and Young People is Everyone's Business V7 Child and Child Protection Safeguarding Policy and Procedure V6.2 College Safeguarding is Everyone's Business V3

**Executive approval is subject to the understanding that the policy Owner has followed the organisation process for policy ratification.**

## Document Review History

Version no.	Type of Change: Major, minor, none or taken out of use	Date	Author of change	Description of change
1.0	New Document	Nov 2015	SLT	Complete revision
1.0	Major	Jan 2016	SLT	Addition of Appendix
1.0	Minor	Nov 2017	SLT	Updated
1.0	Minor	Sept 2020	CEO	Updated
2.0	Major	Sept 2022	Safeguarding Lead	Separation of Adult and Child Policies Creation of overarching charity policy
2.1	Major	May 23	Safeguarding Lead	Names of DSLs, Definition of notifiable events, combining of College and Community, new top level report format
3.1	Minor	Sept 2023	Safeguarding Lead	Names of DSLs and Safeguarding Lead
4.0	Major	Sept 2024	Charity Safeguarding Lead	Name of Charity Safeguarding Lead Update to reflect KCSIE changes and the implementation of the Safeguarding Adults Policy
4.1	Minor	Sept 2025	Charity Safeguarding Lead	Additional details from KCSIE and WTTSC Amendments to record keeping

