

# Child Protection & Safeguarding Policy

## KEY CONTACTS

Lifespace Designated Safeguarding Leads (DSL)			
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Leadership			
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Board members with Safeguarding Responsibilities			
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## FOR ADVICE AND SUPPORT ABOUT ANY SCHOOL RELATED SAFEGUARDING MATTER

MASH Education Lead:  
01926 418608  
[MASHeducationlead@warwickshire.gov.uk](mailto:MASHeducationlead@warwickshire.gov.uk)

## FOR URGENT CONCERNS

MASH  
9am to 5.30pm (5pm on Friday) 01926 414144  
Out of hours: 01926 886922  
[mash@warwickshire.gov.uk](mailto:mash@warwickshire.gov.uk)

## FURTHER INFORMATION, ADVICE AND SUPPORT

Lifespace subscribe to the A&A Safeguarding in Education Advice and Support Subscription Service – contact [advice@asaine.co.uk](mailto:advice@asaine.co.uk) where applicable for additional guidance.

## TABLE OF CONTENTS

	Terminology	Pg 3
1	Policy Statement and Principles	4
2	Child Protection Statement	4
3	Policy Principles	4
4	Policy Aims	5
5	Safeguarding legislation and guidance	5
6	Roles and responsibilities	5
6.1	Designated Safeguarding Lead	5
6.2	Deputy Designated Safeguarding Leads	6
6.3	Board of Trustees	6
6.4	CEO	6
6.5	Staff Team	7
7	Safer working practice	7
7.1	Working in schools	7
7.2	Working Online and/or by phone where the school is the referral agency	8
7.3	Working with students when a parent, carer or another agency makes the referral, including Early Help/MIISC	8
7.4	Self-referrals for 16+	8
7.5	Good Practice to protect against allegations of abuse	
8	Code of conduct	8
9	Abuse of position of trust	9
10	Partnership working	9
11	Children who may be particularly vulnerable	9
12	Children with special educational needs, disabilities or physical health issues	10
13	Children with mental health needs	10
14	Bullying, child on child abuse and harmful sexual behaviour	10
15	How Lifespace will respond to reports of sexual violence and harassment	10
16	Sharing of nude and semi-nude images and videos	10
16.1	Viewing imagery	11
17	Support for children, families and staff involved in a child protection issue	11
18	Complaints procedure	11
19	Reporting concerns about a colleague or other adult who works with children (Whistleblowing)	11
20	Managing allegations against staff	12
21	Staff Training	13
22	Safer recruitment and employment	14
23	Record keeping	15
24	Confidentiality and information sharing	15
25	Offsite arrangements	17
26	Photography, videography and images	17
27	Online safety	17
28	Forms of abuse	18
28.1	Recognising abuse	18
28.2	Physical abuse	18
28.3	Emotional abuse	18
28.4	Sexual abuse	19
28.5	Neglect	19
29	Making a referral to Children's Social Care	19
30	The referral process	19
31	Serious violence	19
32	Extra-familial harms (contextual safeguarding)	19
33	Child sexual exploitation and child criminal exploitation	20
34	So-called 'honour based' abuse	20
35	Protecting children from radicalisation and extremism	20
36	Children who are looked after, were previously looked after or who have a social worker	20
37	Domestic abuse	20
38	Homelessness	21
39	Children with family members in prison	21
40	Elective Home Education	21
41	Related Lifespace Policies	21
42	Reference Sources	21

## TERMINOLOGY

- **Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment; preventing the impairment of children's mental and physical 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.
- **Child protection** refers to the processes undertaken to protect children who have been identified as suffering or at risk of suffering significant harm.
- **Staff** refers to all those working for or on behalf of Lifespace, full-time or part-time, temporary or permanent, in either a paid or voluntary capacity. This includes trustees.
- **Child/children** includes everyone under the age of 18.
- **Parent** refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

## 1 POLICY STATEMENT AND PRINCIPLES

This document describes Lifespace's Safeguarding policy and procedures for the protection of children at risk. A child is defined as up to the age of 18. The document applies to all Lifespace staff, including apprentices, trustees, volunteers, freelancers and consultants. They apply to all of the charity's activities.

All adults who come into contact with children in their work have a duty of care to safeguard and promote their welfare. Child protection refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

The Children Act 2004 places a duty on organisations to safeguard and promote the wellbeing of children. This includes the need to make sure that all adults who work with or on behalf of children in organisations are competent, confident, and safe to do so (Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children, DfE, Feb 2023).

In this policy, safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Making sure children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best life chances.
- The four categories of abuse are: Physical, Emotional, Sexual and Neglect.

This policy is available on our website and all staff are required to read it and confirm they have done so in writing before commencing work. They must attend annual Safeguarding Training and re-read and sign annually.

## 2 CHILD PROTECTION STATEMENT

We, the trustees and staff at Lifespace recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where all children (including those having protected characteristics under the Equalities Act 2010) are respected, valued, feel secure, are encouraged and given opportunities to talk to trusted adults who listen to them. We are alert to the signs of abuse, exploitation and neglect and follow our procedures to ensure that all children receive effective support, protection, and justice.

The procedures contained in this policy apply to all staff and are consistent with statutory guidance and those of the multi-agency safeguarding arrangements put in place by Warwickshire Safeguarding.

## 3 POLICY PRINCIPLES

- Safeguarding is everyone's responsibility.
- Lifespace's responsibility to safeguard and promote the welfare of children is of paramount importance.
- All children, regardless of age, gender, ability, culture, race, language, UK residence status, religion or sexual identity, have equal rights to be safe, feel safe, to protection and to have their welfare promoted.
- Lifespace is committed to safeguarding and promoting the welfare of children and expects all staff share this.
- All staff are carefully selected, and checked by the Disclosure and Barring Service, have two appropriate references and understand and accept their responsibility for the safety of children.
- All staff are expected to build trusted relationships with children, to take all welfare concerns seriously and act in the best interests of children; while remembering that they may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or may not recognise their experiences as harmful.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home or in the community including Lifespace provision.
- All staff members will maintain an attitude of 'It could happen here' where safeguarding is concerned. That includes incidents of child on child abuse.
- If, at any point, there is a risk of serious harm, a referral will be made to Children's Social Care and/or the Police immediately. **Anybody can make a referral.** If the child's situation does not appear to be improving, any staff member with concerns should press the Designated Safeguarding Lead (DSL) for re-consideration.
- If a member of staff remains concerned about a child, they should discuss these with the DSL or DDSL; contact Children and Families Front Door on 01926 414144 or via [triagehub@warwickshire.gov.uk](mailto:triagehub@warwickshire.gov.uk); or the Front Door Education Lead on 01926 418608 or via [MASHeducationlead@warwickshire.gov.uk](mailto:MASHeducationlead@warwickshire.gov.uk) for advice.
- Children and staff involved in child protection issues will receive appropriate support.
- This policy will be reviewed annually unless an incident, new legislation or guidance suggests the need for an interim review. Staff and trustees will be involved in reviewing and developing the policy.

## 4 POLICY AIMS

- To provide all staff with necessary information to meet their safeguarding and child protection responsibilities.
- To always act in the interests of the child.
- To ensure consistent good practice.
- To inform children, parents and other partner agencies about the charity's arrangements for safeguarding.
- To demonstrate the charity's commitment with regard to safeguarding and child protection to parents/carers, children and other partners.
- To respond swiftly and appropriately to all suspicions or allegations of abuse and to ensure that confidential information is restricted to the appropriate external agencies.
- To contribute to the charity's safeguarding portfolio.

## 5 SAFEGUARDING LEGISLATION AND GUIDANCE

The statutory guidance **Working Together to Safeguard Children (DfE 2023)** covers the legislative requirements and expectations of individual services (including schools and colleges) to safeguard and promote the welfare of children. It also provides the framework for the three local safeguarding partners (the local authority; a clinical commissioning group for an area, any part of which falls within the local authority; and the chief officer of Police for a Police area, any part of which falls within the local authority area) to make arrangements to work together to safeguard and promote the welfare of local children including identifying and responding to their needs. The guidance confirms that it applies, in its entirety, to all schools.

**Keeping Children Safe in Education 2024** highlights it is essential that **everybody** working in a school or college understands their safeguarding responsibilities. **All** staff who work directly with children must read Part One, Part Five and Annex B of KCSiE. The CEO and DSL will keep a record of confirmation. This will be gathered through 121 Supervision sessions.

**What to do if you're worried a child is being abused 2015 - Advice for practitioners** is non-statutory advice which helps practitioners (everyone who works with children) to identify abuse, exploitation and neglect and take appropriate action – please see [Child abuse concerns: guide for practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/child-abuse-concerns-guide-for-practitioners).

## 6 ROLES AND RESPONSIBILITIES

A table of Lifespace Safeguarding Roles and Postholders can be found on the cover of this policy. The implementation of this policy is mandatory across all areas of Lifespace. Specific responsibilities are as follows:

### 6.1 DESIGNATED SAFEGUARDING LEAD (DSL)

- Is a senior member of staff from Lifespace's core team and therefore has the status and authority within Lifespace to carry out the duties of the post, including committing resources, supporting and directing staff.
- Takes lead responsibility for safeguarding/child protection, which will not be delegated although activities may be delegated to DDSLs. The role and responsibility are explicit in the role holder's job description.
- Is appropriately trained (including Prevent and online safety training), receives refresher training at 2-yearly intervals and regularly updates (at least annually) knowledge and skills; to keep up with relevant changes.
- Works closely with statutory/voluntary partners including those with designated responsibility for promoting children's mental health and emotional wellbeing.
- Has a working knowledge of multi-agency arrangements put in place by Warwickshire Safeguarding.
- Keeps detailed and accurate records of all concerns, ensuring such records are stored securely and flagged.
- Refers cases of suspected abuse, exploitation or neglect to Children's Social Care or the Police as appropriate; and, where a crime may have been committed, refers cases to the Police.
- Ensures all staff sign to confirm they have read and understand the child protection/other applicable policies.
- Ensures all staff understand that if they have **any concerns** about a child's welfare, they should act on them immediately, either by speaking to the DSL (or a DDSL) or, in exceptional circumstances, taking responsibility to make a referral to Children's Social Care.
- Ensures all staff make a full record of **any** safeguarding concerns using a Green Form, and to, in accordance with partnership agreement, share a copy, with the school DSL and the charity's DSL.
- Has a working knowledge of relevant national guidance in respect of all issues highlighted within this policy.
- Ensures all staff receive regular updated safeguarding training and keeps a record of attendance and training evidence.
- Understands the unique risks associated with online safety and ensures that staff are trained accordingly.
- Understands the relevance of data protection legislation and regulations, especially the Data Protection Act 2018 and General Data Protection Regulation (GDPR) in respect of safeguarding children.
- Ensures that the child protection policy and procedures are reviewed and updated at least annually and that

- the most up-to-date version is available publicly, i.e., on the charity's website or by other means.
- Liaises with the nominated Trustee and CEO with topline information. Informs the CEO of any serious safeguarding enquiries, especially under section 47 of the Children Act 1989 and any Police investigations.
- Ensures schools/parents are aware of Lifespace's role in safeguarding and that referrals about suspected abuse, exploitation and neglect may be made.

## 6.2 DEPUTY DESIGNATED SAFEGUARDING LEADS (DDSL)

- Are appropriately trained (including Prevent and online safety training) to the same standard as the DSL and supports the DSL with safeguarding matters as appropriate.
- In the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children.
- The role and responsibility are explicit in all role holders' job descriptions.
- In the event of the long-term absence of the DSL, DDSLs will assume all the functions of the DSL as above.

## 6.3 BOARD OF TRUSTEES

- Have strategic responsibility for the charity's safeguarding arrangements and **must** have regard to statutory guidance, *Keeping Children Safe in Education (DfE 2024)*; and *must have regard to that guidance*, ensuring policies, procedures and training are effective and comply with the law including the Human Rights Act 1998 and the Equality Act 2010 at all times.
- Facilitates a whole charity approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development; and that ultimately, all systems, processes and policies operate with the best interests of children at their heart.
- Appoints a DSL who is a senior member of staff from the Lifespace Core Team and who has undertaken training in inter-agency working, in addition to basic child protection training.
- Ensures that the DSL and DDSL roles are explicit in the role holder's job description and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff.
- Ensures the charity has policies and procedures in place to safeguard and promote children's welfare.
- Ensures that a DSL or DDSL is always available during delivery hours to discuss safeguarding concerns.
- Develops an induction strategy that ensures all staff, including the CEO, temporary staff, are provided with copies of or access to this and all relevant policies on commencement in post.
- Ensures that Lifespace has procedures for dealing with allegations of abuse made against and about the conduct of staff (within the code of conduct policy); including allegations made against and about the CEO.
- Develops a training strategy that ensures all staff, including the CEO receive appropriate and regularly training (including online safety) and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard children effectively in line with requirements. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.
- Ensures that Lifespace contributes to inter-agency working and plans.
- Ensures that all trustees receive mandatory safeguarding and child protection (including online) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole charity approach to safeguarding. Their training will be updated regularly.
- Nominates a member (normally the Chair) to be responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the CEO.
- Identifies a named trustee to take leadership responsibility for the charity's safeguarding arrangements. That trustee will maintain regular contact with the DSL and will ensure that the Board receives regular reports.
- Ensures the charity's safeguarding, recruitment and allegations management procedures consider the procedures and practice of the Local Authority, local safeguarding partnership and national guidance.
- Ensures that the charity follows safer recruitment procedures and maintains the single central record in accordance with Part 3 of *Keeping Children Safe in Education 2024*.
- Part of the duties of the post involve contacting the Local Authority Designated Officer (LADO) on any matter that the DSL considers cannot be properly dealt with internally.

## 6.4 CHIEF EXECUTIVE OFFICER

- Ensures that the child protection policy and procedures are understood and implemented by all staff.
- Allocates sufficient time, training, support and resources, including cover arrangements, when necessary, to enable the DSL and DDSLs to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedure.

- Ensures that staff do everything they can to support when Children's Social Care become involved. In partnership with the DSL ensure that the charity follows safer recruitment procedures and maintains the single central record in accordance with Part 3 of *Keeping Children Safe in Education 2024*.
- Refers all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff to the Local Authority Designated Officer (LADO) within 1 working day prior to an internal investigation.
- Ensures that anyone who has harmed or may pose a risk of harm to a child is referred to the Disclosure and Barring Service, as advised by the LADO.
- Refers to the Disclosure and Barring Service (DBS) whenever a decision is made to stop using the services of an individual (including supply staff and individuals not employed by the charity but working with children on) because they are considered to be a risk to children, as required by the *Protection of Freedoms Act 2012*.
- Appoints a case officer, from the core team, to investigate allegations concerning members of staff and/or act as a point of contact for the member of staff against whom the allegation is made.
- Responds to all concerns about conduct of staff (encompassing any breach of the code of conduct policy) in a timely and proportionate manner, taking advice from the LADO and our appointed HR advisor as appropriate.

## 6.5 STAFF TEAM

Employed staff are responsible for making sure that:

- Staff are able to discuss safeguarding, child protection and abuse issues confidentially and receive guidance and support on action if situations arise.
- The Safeguarding Policy is fully implemented locally and procedures to support the policy are set up as outlined, complied with and communicated.
- The referral of all safeguarding and child protection issues to the DSL/DDSLs. This may be as simple as discussing a hypothetical issue to protect identities.
- Staff are aware of their roles and responsibilities under this policy.
- Staff undertake appropriate and required induction and refresher training at the required level annually.

All staff, paid or volunteer, are responsible for making sure that:

- Concerns are raised in accordance with this policy.
- That they attend and participate in training in order to refresh and enhance current learning.
- That they attend supervision, in line with the *Supervision Policy*, for their own wellbeing and to ensure a professional and high-quality delivery to children.

## 7 SAFER WORKING PRACTICE

The word "session" is used below to cover all delivery of our work.

- Staff must give due regard to issues of safety at all times. This includes carrying out appropriate risk assessments (see *Lifespace Health and Safety Policy*).
- Staff working with children should be appropriately trained and qualified to make sure the safe provision of services and resources. Each mentor has a supervisor who meets with them twice a term and who is available for guidance across the range of Lifespace mentoring including Safeguarding. As well as an intensive induction course which includes NSPCC and PREVENT online training modules, there is a group supervision and training termly on specific issues for example; LGBTQ+, drug use and addiction.
- Staff are expected to promote, demonstrate and incorporate the values of fairness, trust and ethical practice; showing respect for all individuals regardless of age, development stage, ability, sex, sexual orientation or ethnicity throughout the session.

### 7.1 WORKING IN SCHOOLS

- Mentoring that takes place in schools is in a room or setting that is "overseen but not overheard" – mentors work with children on a one-to-one basis in an allocated room, signing in and out. School staff create appointments and/or have a list of appointments. If student's "drop-in" without an appointment, details are shared as soon as possible.
- Staff should behave and dress in a manner as described in Lifespace's code of conduct. Staff are responsible for familiarising themselves with building/facility safety issues, such as fire procedures, location of emergency exits, location of emergency telephones and first aid equipment. We will adhere to the school's and/or Lifespace's Lone Working Policy, whichever is most stringent.

## 7.2 WORKING ONLINE AND/OR BY PHONE WHERE THE SCHOOL IS THE REFERRAL AGENCY

- Make sure that additional consent from parents/carers and students has been achieved and the details logged in the Lifespace office. Staff should only use the contact information included in that consent i.e., should not email the student to ask for a phone number/another way to make contact.
- Only use the nominated Lifespace email and student's school email address – both of which can be viewed by members of Lifespace and school staff.

## 7.3 WORKING WITH STUDENTS WHEN A PARENT, CARER OR ANOTHER AGENCY MAKES THE REFERRAL, INCLUDING EARLY HELP/MHISC

- Whilst the majority of Lifespace staff make use of existing reporting pathways in the schools they work in, staff providing mentoring or training for children in different settings will not be able to make use of these pathways. In this instance they should follow the guidelines below.
- Make sure a direct referral mentoring request form has been completed and signed by the parent or carer with parental responsibility, and the details logged in the office. Staff should only use the contact information included in that consent i.e., should not email the student to ask for a phone number or another way to make contact and should only use a nominated Lifespace email that can be viewed by members of Lifespace staff.
- Face-to-face mentoring will take place in a public place. Mentors will adhere to our Lone Working Policy.

## 7.4 SELF-REFERRALS FOR 16+

- Where young people, 16+ self-refer, they must supply contact information for two parents, carers or guardians.
- The parent, carer or legal guardian will be contacted in the event of a safeguarding concern.
- In exceptional circumstances e.g. where there is suspected parental abuse, we will go directly to statutory services with any concerns.
- Private emails may be used for appointment booking but NO personal information may be shared and NO online sessions will be permitted unless via a school/college email account.

## 7.5 GOOD PRACTICE TO PROTECT AGAINST ALLEGATIONS OF ABUSE

Staff should not:

- Spend excessive amounts of time alone with children.
- Take children to their own home.
- Offer a lift to a child.
- Share their personal contact information, including social media, with children.
- Bring gifts or items of a personal nature to the child.

When occasions arise where these situations do occur they should be done with the full knowledge and consent of someone in charge of the organisation and/or the parents/carers of children at risk.

Staff should never:

- Allow children to use inappropriate language unchallenged.
- Make sexually suggestive comments about or to a child even in fun.
- Let an allegation that a child makes during a session go unchallenged or unrecorded.
- Do things of a personal nature for children e.g. lending them money or buying gifts.

## 8 CODE OF CONDUCT

To meet and maintain our responsibilities towards children, we set out our expectations of staff in the code of conduct policy. In summary, our expectations include:

- treating all children with respect;
- setting a good example by conducting themselves appropriately;
- involving children in decisions that affect them;
- encouraging positive, respectful and safe behaviour among children;
- being a good listener;
- being alert to changes in children's behaviour and to signs of abuse, exploitation and neglect;
- recognising that challenging behaviour and mental health difficulties may be an indicator of abuse, exploitation or neglect;
- reading and understanding the child protection policy, code of conduct policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, criminal and sexual exploitation, extremism, online safety and information-sharing;



- asking the child's permission before initiating legitimate physical contact, such as administering first aid;
- maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language;
- not participating in, tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- understanding behaviours (potentially criminal in nature) which constitute sexual harassment, such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts;
- being aware that the personal and family circumstances and lifestyles of some children and lead to an increased risk of abuse and exploitation;
- referring all concerns about a child's safety and welfare to the Lifespace DSL and school/setting DSL or, if necessary, directly to the Police or Children's Social Care;
- following our rules regarding communication and relationships with children, including via social media; and
- referring all allegations against members of staff or other adults that work with children and any concerns about staff conduct which breaches the code of conduct policy directly to the CEO; and any similar allegations against or concerns about the CEO directly to the chair of trustees.
- to embody the Lifespace Charter, which sets out how we will behave.

## 9 ABUSE OF POSITION OF TRUST

All staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards children must be beyond reproach. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means any sexual activity between a member of staff and a child under 18 may be a criminal offence, even if that child is over the age of consent.

## 10 PARTNERSHIP WORKING

Lifespace recognises that it has a duty of care to children when delivering collaborative work with

-statutory agencies. We will ensure that each collaboration clearly indicates which party is leading on Safeguarding reporting, whose monitoring system will be used and the mechanism for sharing relevant information.

Where we feel a partner agency may not adequately safeguard children we will 'call out' concerns and, where applicable, escalate as detailed in section 16.

## 11 CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

Some children are more vulnerable to abuse, exploitation and neglect than others. Several factors may contribute to that increased vulnerability, including prejudice and discrimination; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse, exploitation and neglect can occur; as well as an individual child's personality, behaviour, disability, mental and physical health needs and family circumstances.

To ensure that all children receive equal protection, we will give special consideration to those who:

- have a disability, special educational needs, mental health needs or certain medical or physical health conditions.
- do not have English as a first language; and/or who are:
- young carers.
- affected by parental substance misuse, domestic abuse and violence or parental mental health needs.
- asylum seekers.
- looked after by the Local Authority, otherwise living away from home or were previously looked after.
- in receipt of support and services from a social worker.
- vulnerable to being bullied, or engaging in bullying behaviours.
- living away from home or in temporary accommodation.
- living transient lifestyles.
- living in chaotic and unsupportive home situations.
- missing education; or absent from education, particularly on repeat occasions and/or for prolonged periods.
- vulnerable to discrimination and maltreatment on the grounds of race, gender, ethnicity, religion, disability or sexuality (N.B. children who regard themselves or are perceived by other children as lesbian, gay, bi, trans or non-binary can be targeted by other children).
- at risk of child sexual exploitation (CSE) and/or child criminal exploitation.

- at risk from or are involved with serious violent crime.
- at risk of female genital mutilation (FGM).
- at risk of forced marriage.
- at risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive.

## 12 CHILDREN WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES OR PHYSICAL HEALTH ISSUES

Children with special educational needs and/or disabilities (SEND) or certain health conditions are more vulnerable to abuse, exploitation and neglect and can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, exploitation and neglect experienced by this group of children, which can include:

- assumptions that indicators of possible abuse, exploitation or neglect such as behaviour, mood and injury relate to the child's special needs, disability or condition without further exploration;
- the potential for children with SEND or certain medical conditions being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children, possibly without outwardly showing any signs; and
- communication barriers and difficulties for children overcoming those barriers to report their experiences.

## 13 CHILDREN WITH MENTAL HEALTH NEEDS

All staff are trained to be aware that mental health problems can, in some cases, be an indicator that a child has suffered, is suffering or is at risk of suffering abuse, exploitation or neglect. Staff are not expected or trained to diagnose mental health conditions or issues but they will record and report any concerns about a child's mental health to the school/setting and Lifespace Designated Safeguarding Lead as with any other safeguarding concern.

Where children have suffered abuse, exploitation, neglect or other potentially traumatic adverse childhood experiences including child on child abuse, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are trained to be aware of how these can impact children's mental health, behaviour, and education.

Children who are experiencing mental health problems are also more likely to experience isolation and to miss education, which can render them vulnerable to abuse including child on child abuse (online and face to face), grooming, exploitation and radicalisation.

## 14 BULLYING, CHILD ON CHILD ABUSE AND HARMFUL SEXUAL BEHAVIOUR

Bullying is a very serious issue that can cause children considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some children. Staff are expected to address, make a record of and report all incidences of bullying, including cyber-bullying and prejudice-based bullying.

Additional information can be found within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

## 15 HOW LIFESPACE WILL RESPOND TO REPORTS OF SEXUAL VIOLENCE AND HARASSMENT

While it is not possible to anticipate every particular set of circumstances and therefore what the response will be to every case, Lifespace will respond to reports of specific incidents of sexual violence and sexual harassment in accordance with Part 5 of *Keeping Children Safe in Education 2024*.

All responses to disclosures of sexual violence will be reported to the Lifespace and school/setting DSL (or DDSL), using her/his professional judgement and supported by other agencies, such as Children's Social Care and the Police. The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis. Advice may also be sought from the Children and Families Front Door Education Lead on 01926 418608 or via [MASHeducationlead@warwickshire.gov.uk](mailto:MASHeducationlead@warwickshire.gov.uk) or [triagehub@warwickshire.gov.uk](mailto:triagehub@warwickshire.gov.uk).

## 16 SHARING OF NUDE AND SEMI-NUDE IMAGES AND VIDEOS

Children who share nude and semi-nude images and/or videos of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising children unnecessarily. The primary concern at all times will be the welfare and protection of children involved. We will work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

## 16.1 VIEWING IMAGERY

Lifespace staff should **not** view youth produced sexual imagery.

If delivering in school, staff must advise the school DSL immediately as they have additional responsibilities and powers. In all cases, staff must complete a Green Form and contact a Lifespace DSL immediately after the session.

Additional information can be found within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

## 17 SUPPORT FOR CHILDREN, FAMILIES AND STAFF INVOLVED IN A CHILD PROTECTION ISSUE

Child abuse, exploitation and neglect are devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support children, where applicable their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person (usually DSL) who will keep all parties informed and be the central point of contact;
- Where a member of staff is the subject of an allegation made by a child separate link people will be nominated to avoid any conflict of interest;
- responding sympathetically to any request from children or staff for time out to deal with distress/anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals/agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support;
- following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary policies
- co-operating fully with relevant statutory agencies.

## 18 COMPLAINTS PROCEDURE

Our *Complaints Policy* will be followed where a child, parent, co-worker, school or partner agency raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a child or attempting to humiliate them, bullying or belittling a child or discriminating against them in some way. Complaints are managed by the CEO, other members of the core team and Trustees.

Complaints from staff are dealt with under the charity's *Complaints, Disciplinary and Grievance Policies*. Complaints which escalate into a child protection concern will automatically be managed under Lifespace's child protection procedures.

## 19 REPORTING CONCERNS ABOUT A COLLEAGUE OR OTHER ADULT WHO WORKS WITH CHILDREN (WHISTLEBLOWING)

Staff who are concerned about the conduct of a colleague, or any adult working in, with or on behalf of the charity, towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation and they will wonder whether a report could jeopardise a colleague or other practitioner's career. All staff must remember that the welfare of the child is paramount.

The charity's **whistleblowing** procedure enables staff to raise concerns or allegations in relation to any colleague or adult as listed above, initially in confidence, and for a sensitive enquiry to take place.

Staff are trained and expected to report **all** concerns (including concerns that arise online and offsite) about poor practice or possible child abuse, exploitation or neglect by adults to the CEO to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protects children and reduces the risk of serious abuse.

There is no single way in which staff are required to report concerns of this nature. The most important thing is that the concern is brought to the attention of the CEO or nominated Trustee.

All concerns including '*low-level concerns*' should be recorded in writing, to include the details of the concern, the context in which they arose and the action taken; and that the name of the individual sharing their concerns should also be noted but that if the individual wishes to remain anonymous then that should be respected as far as is reasonably possible. NB The term '*low-level concern*' does not mean that the concern is insignificant, it means that the behaviour towards a child may not be deemed to meet the harm threshold or require referral to the Local Authority Designated Officer (LADO).

Written concerns should be passed directly to the CEO. Alternatively staff are free to approach the CEO directly to discuss their concerns. Concerns or complaints about the CEO should be reported to the Chair of Trustees, contact details for whom, are provided on the cover of this policy. Staff may also report concerns about suspected abuse, exploitation or neglect directly to Children's Social Care or the Police if they believe direct reporting is necessary to secure action to safeguard children.

**Staff can also contact the Local Authority Designated Officer (LADO)**, who is responsible for the co-ordination of responses to allegations against people who work with children (see criteria, contact and referral details in section 16 below).

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m., Monday to Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Information is also available on the NSPCC website at <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>.

Contact numbers for the LADO, Children's Social Care and the Police; and the NSPCC whistleblowing helpline are all displayed in the Lifespace office and included in the Mentor Handbook.

N.B. Staff are encouraged to feel confident to self-refer to the CEO where they have found themselves in a situation that could be misinterpreted or might appear compromising to others; or, on reflection they recognise their behaviour might be deemed to have contravened the Staff Behaviour (Code of Conduct) Policy and/or fallen below expected professional standards.

## 20 MANAGING ALLEGATIONS AGAINST STAFF

When an allegation is made against a member of staff set procedures must be followed. The full procedures for dealing with allegations against staff can be found in Part 4 of *Keeping Children Safe in Education 2024* and para 1.14 of Warwickshire Safeguarding Partnership multi-agency safeguarding procedures *Allegations against staff or volunteers* – <https://westmidlands.procedures.org.uk/ykpsy/statutory-child-protection-procedures/allegations-against-staff-or-volunteers>

As required by *Keeping Children Safe in Education 2024*, all allegations in respect of an individual who works (permanently or temporarily) or volunteers at a school that fulfil any of the following criteria (the harm test) will be reported to the Local Authority Designated Officer (LADO) within one working day:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The LADO's contact number is **01926 745376**. Referrals to the LADO will be submitted on a Position of Trust Referral Form and sent to [lado@warwickshire.gov.uk](mailto:lado@warwickshire.gov.uk).

All allegations against former members of staff that meet the criteria will also be referred to the LADO in the first instance. On occasions, the LADO may not be able to advise about and/or co-ordinate the response to historical allegations because the current whereabouts of the former member of staff are unknown and/or it is unknown whether the individual is currently employed or volunteering in a role involving work with children. In any such circumstances and following advice from the LADO, the matter will be reported to the Police.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. However, in some cases staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, the school will provide support and a named contact for the member of staff.

Staff and trustees are reminded that publication of material that may lead to the identification of a staff member who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites. Lifespace will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

NB it is the CEO's responsibility to contact and refer to the LADO when necessary. The only exceptions are when the allegation is against the CEO, in which instance the Chair of Trustees will undertake that responsibility; or where a member of staff is concerned that appropriate action has not been taken by the CEO, in which instance the member of staff should contact the LADO directly in order to safeguard children. The LADO's contact details are above.

In the event of a member of staff being dismissed or removed due to safeguarding concerns or they would have been had they not resigned, the school will fulfil its legal duty to make a referral to the Disclosure and Barring Service (DBS). Failure to refer when the criteria are met is a criminal offence.

Upon receipt of an allegation or concern about a member of staff's conduct that is in breach of the code of conduct policy but may not meet the harm test as above (defined in *Keeping Children Safe in Education 2024* as a 'low level concern'), the CEO will have a decision to make about an appropriate and proportionate response in order to maintain a safe environment for children.

In the event that the CEO is not certain whether or not the allegation/concern meets the harm test, they will always contact the LADO for advice. Once it has been established that the allegation or concern does not meet the harm test, actions are likely to include one or more of the following:

- Seeking advice from the charity's HR advisor about whether or not the allegation/ concern warrants action including the possibility of an internal investigation subject to the charity's disciplinary or capability procedures. That will include establishing whether or not it is necessary and proportionate to suspend the member of staff in the first instance in order to maintain the integrity of any investigation.
- If the allegation/concern does not warrant formal action or investigation, speaking to the member of staff and any other individuals as necessary to clarify the nature of the issues.
- Providing the member of staff with informal management advice. A written record will be made, shared with the member of staff and placed on their personnel file subject to HR advice and the charity's record retention policy.
- Consideration of the need to amend policies, procedures and staff training; and/or briefing all staff to remind them of relevant aspects of policies with particular reference to the Staff Behaviour (Code of Conduct) Policy.

Written records of all concerns and the response to them will be retained securely in compliance with the Data Protection Act 2018.

Concerns about external staff, other third-party providers and contractors **will** be notified to their employers so that any potential patterns of inappropriate behaviour can be identified; but the charity will take responsibility for undertaking any investigation of concerns that arise in the conduct of charity business.

## 21 STAFF TRAINING

It is important that all staff have training to enable them to recognise when a child is upset, worried anxious or in any way different from their usual presentation as a foundation for their understanding of the possible signs of abuse, neglect, exploitation and radicalisation both within and outside home environments; and to know what to do if they have a concern.

New staff, who will have direct contact with children will receive an explanation during their induction which will include:

- the charity's *Child Protection and Safeguarding Policy*
- signs and symptoms of abuse, exploitation and neglect
- online safety
- child on child abuse
- 'children' includes everyone under the age of 18
- extra-familial harms including criminal and sexual exploitation; county lines; serious violence; domestic abuse within intimate teenage relationships; and radicalisation;
- responding to disclosure of abuse, exploitation or neglect by a child
- reporting and recording arrangements including allegations against and 'low level concerns' about the conduct of staff and visiting professionals
- the staff code of conduct policy
- the identity and role of the DSL and all Deputy DSLs

NB all of the above will be explained **before** a new member of staff or trustee has direct contact with children. The child protection policy, staff behaviour policy (code of conduct) and supervision policy will be sent with the letter confirming an appointment with a written requirement that the individual reads the policies in advance of starting work. The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood all policies and undertake to comply with them.

All staff, including the CEO and trustees will receive appropriate and regularly updated safeguarding and child protection training and thematic updates including online safety as required (at least annually) and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children effectively in line with statutory guidance, this policy and any requirements of the Safeguarding Partnership.

The DSL and DDSLs will attend training for newly appointed DSLs to provide them with the knowledge and skills required to carry out the role; and refresher training every two years. The DSL and DDSLs will also undertake Prevent awareness training. Training will provide the DSL and DDSLs with a good understanding of the DSL role, in accordance with Annex C of *Keeping Children Safe in Education 2024* and will include the processes, procedures and responsibilities of other agencies, particularly Children's Social Care. In addition, the DSL and DDSLs will update their knowledge and skills at least annually to keep up with any developments relevant to their role and will be supported to access inter-agency training as part of their continuing professional development.

All Trustees will receive appropriate safeguarding and child protection (including online safety) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the school's safeguarding policies and procedures are effective and support the delivery of a robust whole charity approach to safeguarding. That training will be updated regularly (at least annually).

## 22 SAFER RECRUITMENT AND EMPLOYMENT

Our charity endeavours to ensure that we do our utmost to employ only 'suitable' staff and allow only 'suitable' volunteers to work with children. Safer recruitment means that all applicants will:

- complete an application form which includes their employment history and explains any gaps in that history;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children;
- provide evidence of identity and qualifications;
- if offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include:
  - an enhanced DBS check and a barred list check for those engaged in Regulated Activity, which includes all employed staff and unsupervised volunteers;
  - an enhanced DBS check without a barred list check for all volunteers not involved in Regulated Activity but who have the opportunity of regular contact with children;
  - an enhanced DBS check for all Trustees (not including associate members), which will only include a barred list check for Trustees involved in Regulated Activity;
- if offered employment, provide evidence of their right to work in the UK;
- be interviewed by a panel of at least two core staff/Trustees, if shortlisted.

The charity will also:

- ensure that every job description and person specification includes a description of the role holder's responsibility for safeguarding;
- send a criminal record self-disclosure pro forma to all shortlisted candidates, who will be asked to submit the completed self-disclosure for the attention of the interview panel before the date of interview;
- explore any convictions, cautions and other relevant issues disclosed by the candidate at interview;
- ask at least two value-based questions at interview for every about the candidate's attitude to safeguarding and motivation for working with children;
- explore any issues arising from online searches with the candidate at interview;
- verify the preferred candidate's mental and physical fitness to carry out their work responsibilities;
- consider carrying out an online search in respect of all shortlisted candidates in order to identify any information about incidents or issues of concern that is publicly available online, which the charity might want to explore with the candidate at interview (N.B. recruitment materials will make an explicit statement about the charity's policy in relation to online searches so that all applicants are fully informed. Online searches will only seek to identify information that is publicly available and will not include proactive searches of candidates' social media accounts);
- obtain references for all shortlisted candidates, including, where applicable, internal candidates;
- carry out additional or alternative checks for applicants who have lived or worked outside the UK;

At least one member of each recruitment panel will have attended safer recruitment training.

All new members of staff will undergo an induction that includes familiarisation with the charity's child protection and safeguarding policy, code of conduct policy, supervision policy, other issues as identified in this policy and identification of their child protection training needs.

All staff are required to sign to confirm they have received a copy of this Child Protection and Safeguarding Policy, and *Staff Behaviour "Code of Conduct" Policy*.

The charity maintains a single central record of recruitment checks undertaken.

## 23 RECORD KEEPING

Lifespace will maintain safeguarding (including early help) and child protection records in accordance with the Warwickshire County Council Education Safeguarding Service guidance document *Safeguarding Children - Information and Record Keeping* - [https://www.safeguardingwarwickshire.co.uk/images/downloads/ESS-PB/Record-Keeping/Record\\_Keeping\\_Guidance\\_Sept\\_2019.pdf](https://www.safeguardingwarwickshire.co.uk/images/downloads/ESS-PB/Record-Keeping/Record_Keeping_Guidance_Sept_2019.pdf)

The charity will:

- keep clear detailed written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Children's Social Care immediately;
- keep records in a meticulous chronological order, either on paper or electronically;
- ensure all records are kept secure and in locked locations;
- the DSL will consider whether it is appropriate to share any information with statutory partners as applicable.

Staff will record any safeguarding or child protection observations or concerns about a child by completing a Green Form. This will be applicable whether a child accesses school or community provision. The same format will be used by staff to record and report any observations or concerns that suggest a child might benefit from early help.

Staff are trained and expected to make a full record of all conversations with children relating to safeguarding concerns, whether or not the child makes some form of disclosure.

Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child's behaviour, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. Records will be signed, dated and timed by the member of staff making the record.

Records of safeguarding/child protection observations or concerns can be completed electronically or as a paper version but it is most important that one consistent system for the recording of concerns is readily accessible to every member of staff irrespective of role and that all records are passed to the Designated Safeguarding Lead.

The DSL is responsible for ensuring that the record of all concerns, discussions, decisions made and the rationale for those decisions – including decisions about making and not making referrals to partner agencies such as children's social care, the Police or the Prevent program – provides unequivocal clarity about the nature of concerns and the action taken by the charity in response to safeguard the child when the file is read retrospectively. This will also help if/when responding to any complaints about the way a case has been managed by Lifespace; or in the event of needing to share the record with partner agencies (for example in support of a referral to Children's Services or in a child protection conference); or if the record is required as evidence in any Court proceedings.

The Data Protection Act 2018 and GDPR do not prevent Lifespace staff from sharing information with relevant agencies without the consent of parents, where that information may help to protect a child.

## 24 CONFIDENTIALITY AND INFORMATION SHARING

Lifespace will manage and share confidential information about children in line with *Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (HMG 2018)* - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

In making decisions about whether or not to share information about children for safeguarding purposes, the charity will take particular account of the 'The seven golden rules for sharing information (including personal information)', as follows:

1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them. *The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.*
2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why. *You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).*

3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm. *You need a lawful basis to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.*

4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case. *Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. If staff have such concerns, they are trained to speak to the DSL or a deputy DSL. The DSL will seek advice, which may include contacting the school's legal advisor or Children's Social Care or following the NSPCC's safeguarding guidance.*

5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.

6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services. *Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.*

7. Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information. *When a partner agency requests information from the charity and the DSL decides not to share it, the DSL will explain why they chose not to do so and will reconsider their decision if the requestor shares new information that might cause them to regard the information the school holds in a new light. The DSL will record the rationale for their decision and be prepared to explain their reasons if they are asked.*

All staff are trained to understand that child protection issues warrant a high level of confidentiality, not only out of respect for children, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

The Data Protection Act 2018 (DPA) and the GDPR places duties on Lifespace and individual staff to process personal information fairly and lawfully and to keep the information they hold safe and secure. However, neither the DPA or GDPR prevent or limit the sharing of information for the purposes of keeping children safe. *Keeping Children Safe in Education (DfE 2024) states clearly that "Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children".*

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, CEO or outside agency as required.

It is reasonable for staff to discuss day-to-day concerns about children with colleagues in order to ensure that children's general needs are met. However, staff should report all child protection and safeguarding concerns to the DSL or CEO or – in the case of concerns about the CEO – to the chair of trustees. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

*Keeping Children Safe in Education 2024* emphasises that the DSL or a DDSL should always be available to discuss safeguarding concerns but in exceptional circumstances where neither the DSL or DDSL is available, that should not delay appropriate action being taken and staff should speak to the CEO or take advice from Children's Social Care.

The GDPR and the DPA do not prevent staff from sharing information with relevant agencies for the purposes of keeping children safe and promoting their welfare. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. The DSL will normally obtain consent from the child and/or parents to share sensitive information with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

Any child, or parent wishing to access the safeguarding records will need to submit a subject access request in writing to the charity for consideration. Access to the record will then be arranged but records may be redacted in line with the requirements of the General Data Protection Regulation (GDPR) if releasing information would place the child, or any other person, at risk of significant harm.

Information sharing will take place in a timely and secure manner and where: it is necessary and proportionate to do so; and the information to be shared is relevant, adequate and accurate. Information sharing decisions will be recorded, whether the decision is taken to share.



**All staff must be aware that they cannot promise a child/parent to keep secrets.** All safeguarding and child protection information will be handled in line with the principles of the Data Protection Act 2018, which require that sensitive information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure.

All written child protection and safeguarding information will be stored in a locked facility and any electronic information will be password protected. Child protection records will only be made available to relevant individuals with a valid professional reason to see them; parents/carers subject to a subject access request; and children upon request, subject to consultation with parents/carers and partner agencies as deemed appropriate by the DSL.

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

The charity's policies on *Confidentiality* and *Data Protection & GDPR* are available on request.

## 25 OFFSITE ARRANGEMENTS

All offsite activities are subject of a risk assessment to satisfy health and safety and safeguarding requirements. When children attend offsite activities, including day and residential visits and work-related activities, the charity will ensure that effective child protection and whistleblowing arrangements are in place.

When services or activities are provided by Lifespace under the direct supervision or management of staff, our child protection policy and procedures will apply.

## 26 PHOTOGRAPHY, VIDEOGRAPHY AND IMAGES

The use of photography/videography is NOT permitted within mentoring provision but may, from time to time, be used within wider charity purposes.

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse and exploit children through taking or using images, so we must ensure that we have some safeguards in place.

To protect children we will:

- seek their consent for photographs or video images to be taken;
- seek parental consent;
- ensure children are appropriately dressed; and
- encourage children to tell us if they are worried about any photographs/images that are taken of them.

Furthermore, when using images for publicity purposes (e.g., on our website or social media), we will:

- Obtain a signed photo/video release form
- avoid naming children when possible;
- if it is necessary to name children, use first names rather than surnames;
- if children are named, avoid using their image;
- establish whether the image will be retained for further use, where and for how long;
- ensure that images are stored securely and used only by those authorised to do so.

For the protection of children and staff, only charity owned equipment will be used to record and store images taken by staff. Please seek guidance from a Core Team colleague before obtaining any images.

## 27 ONLINE SAFETY

Children commonly use electronic equipment including tablets, computers and mobile phones on a daily basis to access the internet and share content and images via social networking sites such as Snapchat, Instagram, TikTok, Facebook and Twitter. Online gaming with linked chat function is also popular with many children.

Those technologies and the internet are a source of education as well as communication, entertainment and fun. Unfortunately, however, some adults and young people will use those technologies to harm children and the use of technology has become a significant component of many safeguarding issues.

Technology often provides the platform that facilitates harm through child criminal and sexual exploitation; county lines activity; radicalisation; sexual predation; child on child abuse including sexual harassment and cyber bullying.

Additional information can be found within Lifespace's *Online Safety Policy* and *Safeguarding and Child Protection Procedure and Guidance*.

## 28 FORMS OF ABUSE

For guidance on reporting procedure, and associated forms, please refer to the appendices within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

### 28.1 RECOGNISING ABUSE

To ensure that children are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation. Abuse and neglect are forms of maltreatment of children. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

All staff are trained to understand that children can be at risk of harm inside and outside of school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify situations in which children may be in need of help or protection.

All staff are aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. All staff are trained to consider whether children are at risk of abuse or exploitation in situations outside their families including online.

Abuse, neglect and exploitation are forms of maltreatment of children. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone. 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. 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.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by adult men or women or by another child or children. Staff are trained to understand and recognise indicators of all four categories of abuse as defined below:

### 28.2 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 (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

### 28.3 EMOTIONAL ABUSE

The persistent emotional maltreatment of a child such as to cause severe and 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, although it may occur alone.

## 28.4 SEXUAL ABUSE

Involves forcing or enticing a child 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.

## 28.5 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- a. provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- b. protect a child from physical and emotional harm or danger;
- c. ensure adequate supervision (including the use of inadequate care-givers); or
- d. ensure access to appropriate medical care or treatment; or
- e. Provide suitable education.

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

Definitions taken from *Keeping Children Safe in Education* (DfE 2024).

Our focus is the safety and wellbeing of the child. Therefore, if the charity believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from Children's Social Care.

Additional information can be found within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

## 29 MAKING A REFERRAL TO CHILDREN'S SOCIAL CARE

The DSL will make a referral to Children's Social Care (and if appropriate the Police) if it is believed that a child is suffering or is likely to suffer significant harm.

Additional information can be found within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

## 30 THE REFERRAL PROCESS

Full details of the referral process, including child protection referrals, Reporting directly to child protection agencies and information about what children's social care will do can be found within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

## 31 SERIOUS VIOLENCE

All staff are made aware of indicators that children may be at risk from or are involved with serious violent crime; and are trained to record and report any concern about children at risk of or involved in perpetrating serious violence as with any other safeguarding concern. Indicators may include increased school absence; a change in friendships or relationships with older individuals or groups, a significant decline in performance; signs of self-harm or a significant change in wellbeing; and/or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs and/or criminal exploitation.

All staff are trained to be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male; having been frequently absent or permanently excluded from school, having experienced child maltreatment; and/or having been involved in offending, such as theft or robbery.

## 32 EXTRA-FAMILIAL HARMS (CONTEXTUAL SAFEGUARDING)

Safeguarding incidents and/or behaviours can be associated with factors both outside children's home environments, outside school and online. The DSL, DDSLs and all staff will consider the context within which such incidents and/or behaviours occur. Contextual safeguarding means that assessments of children should consider wider environmental factors present in a child's life that are a threat to their safety and/or welfare.

Staff will listen to children and be vigilant about any signs or indicators that would suggest children may be at risk in the community and/or online and will share intelligence with the Police in order to prevent children suffering harm.

Some extra-familial harms are likely to constitute significant harm and will therefore be referred to Children's Social Care as necessary. Lifespace will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Children's Social Care, thus allowing any investigation or assessment to consider all the available evidence and the full context of any abuse or exploitation.

### 33 CHILD SEXUAL EXPLOITATION AND CHILD CRIMINAL EXPLOITATION

**Child sexual exploitation (CSE)** is a form of child sexual abuse. **Child criminal exploitation (CCE)** is a form of child abuse. Both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child under the age of 18 into sexual and/or criminal 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; and/or
- (c) through violence or the threat of violence.
- (d) The victim may have been sexually and/or criminally exploited even if the sexual/criminal activity appears consensual. CSE and CCE do not always involve physical contact; they can occur through technology.
- (e) CSE and CCE can affect any child, under 18, including those who can legally give consent to have sex.

Additional information can be found within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

### 34 SO-CALLED 'HONOUR BASED' ABUSE

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

While not honour-based abuse as such, the charity recognises that, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Staff are expected to report any information or concern that comes to their attention that indicates a child is in any way being encouraged, persuaded, groomed, coerced or threatened - or is engaging in any plans - to take part in any form of marriage before their eighteenth birthday; to the DSL as with any other safeguarding concern.

Additional information can be found within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

### 35 PROTECTING CHILDREN FROM RADICALISATION AND EXTREMISM

Some children may be susceptible to extremist ideology and radicalisation. Protecting children from the risk of radicalisation is part of the charity's wider safeguarding duties.

Additional information can be found within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

### 36 CHILDREN WHO ARE LOOKED AFTER, WERE PREVIOUSLY LOOKED AFTER OR WHO HAVE A SOCIAL WORKER

The most common reason for children becoming looked after is as a result of abuse or neglect. Children who were previously looked after potentially remain vulnerable.

Additional information can be found within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

### 37 DOMESTIC ABUSE

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Many children see, hear or experience the effects of domestic abuse between family members at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

Exposure to domestic abuse and/or violence can have a detrimental and long-term impact on a child's health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Additional information can be found within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

## 38 HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

Additional information can be found within Lifespace's *Safeguarding and Child Protection Procedure and Guidance*.

## 39 CHILDREN WITH FAMILY MEMBERS IN PRISON

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Lifespace will seek to support children in this position through pastoral care, early help and discussions with parents/carers and other family members as appropriate.

## 40 ELECTIVE HOME EDUCATION

Keeping Children Safe in Education 2024 acknowledges that "Many home educated children have a positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs".

## 41 RELATED LIFESPACE POLICIES

- Bullying Policy
- Complaints Policy
- Disciplinary Policy
- Grievance Policy
- Lone Working Policy
- Online Safety Policy
- Safeguarding and Child Protection Procedure & Guidance
- Staff Behaviour Policy "Code of Conduct"
- Supervision Policy
- Whistleblowing Policy
- Recruitment Policy

## 42 REFERENCE SOURCES

This policy has been developed in accordance with the principles established by the Children's Act 1989, the Education Act 2002 and the Children's Act 2004 and in line with the following government publications and other statutory guidance:

- Keeping Children Safe in Education (DfE 2024)
- Working Together to Safeguard Children (DfE 2023)
- Warwickshire Safeguarding Partnership multi-agency safeguarding procedures
- <https://westmidlands.procedures.org.uk/>
- Safeguarding Children - Information and Record Keeping (WCC Education Safeguarding Service)
- What to do if You're Worried a Child is being Abused 2015 - Advice for Practitioners (HMG 2015)
- Children missing education - Statutory guidance for local authorities (DfE 2016)
- Sharing nudes and semi-nudes – Advice for education settings working with children and young people (UK Council for Child Internet Safety 2020)
- Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings DCSF (Oct 2015, updated May 2019)
- Local Safeguarding Boards (29th September 2019, combined responsibility for safeguarding children and adults under the guidance of Working Together 2018 and the Care Act 2014)
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety 2017)

This Policy is communicated to all staff, trustees suppliers and sub-contractors. It will be published on our website and made available to interested parties.

Date of Issue: August 2024	Joanna Broughton	DSL
	Di Pulley	Trustee (Interim Safeguarding Lead)
Date of Next Review: August 2025		
Policy Owner	Designated Safeguarding Lead	