



ReachOut Safeguarding & Child Protection Policy and Procedures

Version: 8.0

Last reviewed: February 2023

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## 1. Introduction and Ethos

- a. This policy is applicable to anyone working on behalf of ReachOut, including senior managers and the board of trustees, paid staff, volunteers, sessional staff and agency staff.
- b. ReachOut is committed to and recognises the importance of creating and maintaining an environment in which young people involved in our work are safe from abuse. This means that any suspicion or allegation of abuse relating to one of our young people is taken seriously, treated in confidence and appropriately and promptly dealt with. Our safeguarding culture encourages young people to talk openly and enables them to feel confident that they will be listened to. We are committed to providing an environment where children are safeguarded and are enabled to disclose if they are being harmed in some way. We are alert to the signs of abuse and neglect and follow our procedures to ensure that all children receive effective support, protection and justice.
- c. ReachOut requires all staff and volunteers to be aware of this policy, follow it and act with the interests of young people of paramount importance. ReachOut staff and volunteers should show respect and understanding for the rights, safety and welfare of the children and young people they are working with at all times. Safeguarding awareness will be a required part of the induction process and managers must ensure all new staff working directly with young people receive, read and understand this policy, which will be reviewed annually, or upon material changes in practice, or changes in regulation or legislation. Appropriate training and support will be given to staff to enable them to deal with safeguarding issues effectively.
- d. Breaches of this policy will be reported to the Designated Safeguarding Lead.
- e. ReachOut recognises that some children may be especially vulnerable to abuse. We understand that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Children referred to ReachOut may exhibit challenging or concerning behaviours which at times may impact on other children either directly or indirectly. We will always take a considered and sensitive approach in order that we can support all young people in our care.
- f. This policy should be read in conjunction with the following documents:
  - Health and Safety Policy
  - Whistleblowing Policy
  - Behaviour Policy
  - ReachOut Code of Conduct

## 2. Definitions

**Safeguarding:** Working Together to Safeguard Children (DfE 2018) defines safeguarding as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

**Child Protection** is an aspect of safeguarding, but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

**Designated Safeguarding Lead (DSL):** The person responsible for dealing with any safeguarding concerns within ReachOut.

**Children/Young People** refers to all young people who have not reached their 18<sup>th</sup> birthday or Looked After Children and SEND young people who have not yet reached their 25<sup>th</sup> birthday. This will apply to all children and young people referred to ReachOut and some alumni of our programme.

**Staff:** Permanent or sessional workers who are paid employees of ReachOut.

**Volunteers:** Unpaid workers including but not limited to trustees, mentors, intermittent office support workers and fundraisers.

**Workers:** People who work with young people, whether as a staff member or volunteer mentor.

**DBS:** Disclosure and Barring Service.

### 3. Context

- a. This policy serves as statutory guidance for all staff and volunteers working with and for ReachOut.
- b. This policy has been developed in accordance with the principles established by the Children's Acts (1989 and 2004) and related guidance. It adheres to *Working Together to Safeguard Children (DfE 2018)* and *Keeping Children Safe in Education (DfE 2021)*.
- c. The Designated Safeguarding Lead and Senior Management Team will ensure regular reporting on safeguarding activity and systems to the Board of Trustees. The Board of Trustees **will not** receive details of individual situations or identifying features of individuals or families as part of their oversight responsibility.

### 4. Key Responsibilities

ReachOut staff and volunteers alongside partner schools and their staff have a statutory responsibility to safeguard and promote the welfare of children, and must fully understand this policy. All workers, including volunteers, must have access to this policy and follow ReachOut's procedures and guidance at all times.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider what is in the best interests of the child, at all times, and all systems, processes and policies should operate with the best interests of the child at their heart.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

- a. Board of Trustees
  - i. ReachOut's Board of Trustees holds overall responsibility for the child protection and safeguarding functions of ReachOut.
  - ii. The Delivery Sub Committee of the Board of Trustees will review and approve and updates and changes to our Safeguarding policy and related procedures.
  - iii. The Board of Trustees and Senior Management Team are responsible for ensuring ReachOut follows best practice Safer Recruitment processes that help to deter, or identify and reject potential applicants who might be a risk to children. Our recruitment process adheres to statutory responsibilities to check adults working with children and has recruitment and selection procedures in place.
  - iv. If a *serious safeguarding incident* (harm to our beneficiaries, staff, volunteers or others who come into contact with ReachOut through our work) takes place within ReachOut, a prompt, full and frank disclosure is required to be made to the Charity Commission by the trustees.

- b. Senior Management Team (SMT)
- i. ReachOut's SMT is responsible for ensuring that this Safeguarding and Child Protection Policy and other relevant policies and procedures are fully implemented and followed by all ReachOut workers.
  - ii. All concerns about poor or unsafe practice regarding children will be addressed sensitively and in a timely manner in accordance with ReachOut's Whistleblowing Policy. We recognise that it is not the responsibility of children to raise concerns.
  - iii. There are robust systems in place to cover for the DSL's planned and unplanned absences, including having Deputy Designated Safeguarding Leads who have the role added to their job descriptions.
- c. ReachOut Workers
- i. All ReachOut workers have a responsibility to provide a safe environment in which children can benefit from our mentoring programme.
  - ii. Any worker who has a concern about a child's welfare should follow the reporting process outlined in *Section 6 – Safeguarding and Child Protection procedures, part n and o*.
  - iii. The Designated Safeguarding Lead (DSL) at each partner school is most likely to have the most complete safeguarding picture for a young person, including information from school, family, other agencies and social services. All concerns must therefore be reported to the DSL at the relevant partner school.
  - iv. ReachOut's Deputy Designated Safeguarding Leads in each location will communicate any and all reports of concerns and disclosures to the Designated Safeguarding Lead at the relevant partner school and to the Designated Safeguarding Lead at ReachOut.
  - v. ReachOut's Designated Safeguarding Lead will provide support to all workers carrying out their safeguarding duties and liaise closely with other services and agencies.
  - vi. As part of their induction, all workers should be aware of:
    - ReachOut's Safeguarding Policy
    - ReachOut's Behaviour Policy
    - Staff Code of Conduct
  - vii. All workers will receive appropriate safeguarding and child protection training which is regularly updated.
  - viii. In addition, all ReachOut staff will receive safeguarding and child protection updates (for example, via email and staff meetings).
  - ix. All ReachOut staff will be aware of the process for making referrals to children's social care.
  - x. All workers should know what to do if a child tells them they are being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Designated Safeguarding Lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.
- d. Partner Schools
- i. Partner schools will provide ReachOut workers with relevant information for any child referred to the programme who:
    - is disabled and has specific additional needs.
    - has special educational needs (whether or not they have a statutory Education, Health and Care Plan).
    - is a young carer.
    - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
    - is frequently missing/go missing from care or from home.
    - is at risk of modern slavery, trafficking or exploitation.
    - is at risk of being radicalised or exploited.

- is in a family situation presenting challenges for the child, such as drug or alcohol misuse, adult mental health issues and domestic violence.
- is misusing drugs or alcohol themselves.
- has returned home to their family from care.
- is a privately fostered child.

ReachOut workers should be particularly alert to the potential need for early help for a child with any of the above challenges.

- ii. Designated Safeguarding Leads at partner schools will communicate as relevant with ReachOut's Deputy and Designated Safeguarding Leads about action taken regarding incidents or concerns reported to the school. They will share information as appropriate in the interests of the young people.
- e. Designated Safeguarding Lead
- i. Board of Trustees should ensure an appropriate senior member of staff is appointed to the role of Designated Safeguarding Lead (DSL).
  - ii. The DSL takes lead responsibility for safeguarding and child protection and for ensuring that the statutory guidance outlined in this policy, local policy and procedures are followed. This should be explicit in the role-holder's job description.
  - iii. The DSL is aware of the local referral route into children's social care in all operating areas.
  - iv. In the absence of the DSL, then one of the Deputy DSLs will take on the responsibilities until the DSL is available.
  - v. Deputy Designated Safeguarding Leads are trained to the same standard as the DSL and are appointed from the project management teams in each location that ReachOut operates in.
  - vi. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL. This responsibility should not be delegated.
  - vii. During term time, the DSL and/or deputies should always be available during project hours for ReachOut workers to discuss any safeguarding concerns.
  - viii. The Designated Safeguarding Lead and deputies should undergo training to provide them with the knowledge and skills required to carry out the role. The training is updated annually.
  - ix. In addition to their formal training as set out above, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, to keep up with any developments relevant to their role.
  - x. The Designated Safeguarding Lead and/or appropriately trained DSL deputies at ReachOut will liaise with schools, Social Services teams and other professionals as appropriate to ensure co-ordinated approaches and actions.
  - xi. Deputy Designated Safeguarding Leads in each location that ReachOut operates in are responsible for liaising with the ReachOut Designated Safeguarding Lead and must inform them of all safeguarding concerns, reports and incidents involving the children our staff and volunteers are in contact with.
  - xii. The DSL is aware of local criteria for action and the local protocol for assessment.
  - xiii. The DSL will also inform:
    - The police in cases where a crime may have been committed; and
    - The Disclosure and Barring Service *and* Charity Commission where a person is dismissed or leaves their employment as a result of having harmed a child or is considered a risk of harm

## 5. Recognition and Types of Abuse and Neglect

- a. Knowing what to look for is vital to the early identification of abuse and neglect. All workers should be aware of indicators of abuse and neglect so that they are able to identify cases of children who

may be in need of help or protection. If workers are unsure, they should always speak to the DSL (or deputy).

- b. The warning signs and symptoms of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be 'normal' for an older child. Parental behaviours may also indicate child abuse or neglect, so ReachOut workers are alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is sudden change in their mental health.
- c. By understanding the warning signs, we 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 does not automatically mean a child is being abused.
- d. All ReachOut workers must be aware of the definitions and signs and symptoms of abuse. There are four main categories of abuse, as defined in Working Together to Safeguard Children, 2018:

Physical abuse

Sexual abuse

Emotional abuse

Neglect

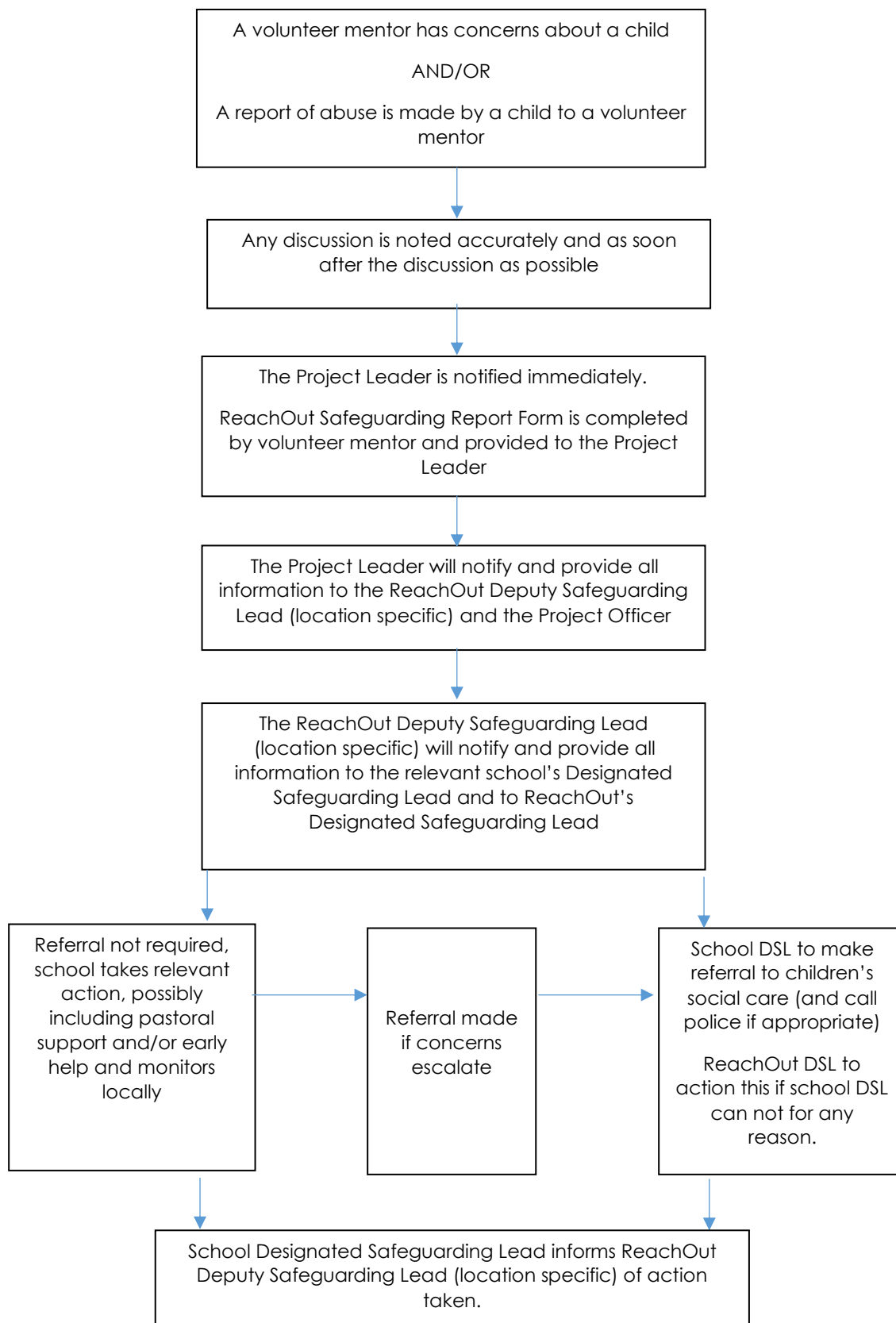
- e. Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- f. The most up to date definitions and possible indicators and signs of abuse are outlined in Appendix 1. Staff and volunteers should also refer to Part 1 and Annex A within Keeping children Safe in education (DfE 2021)
- g. ReachOut workers are also aware of environmental factors which may impact on a child's welfare and safety and understand safeguarding in the wider context (contextual safeguarding).
- h. ReachOut workers are aware that child welfare concerns may arise in many different contexts, and can vary greatly in terms of their nature and seriousness. For example, children may be abused in a family, in an institutional or community setting, by those known to them or by a stranger. They may be abused by an adult or adults, or another child or children. Children may be abused via the internet by their peers, family members or by unknown or in some cases unidentifiable individuals. In the case of honour based abuse, including forced marriage and female genital mutilation, children may be taken out of the country to be abused. An abused child may often experience more than one type of abuse, as well as other difficulties in their lives.
- i. Abuse and neglect can happen over a period of time, but can also be a one-off event. This can have major long-term impacts on all aspects of a child's health, development and well-being.

## **6. Safeguarding and Child Protection Procedures**

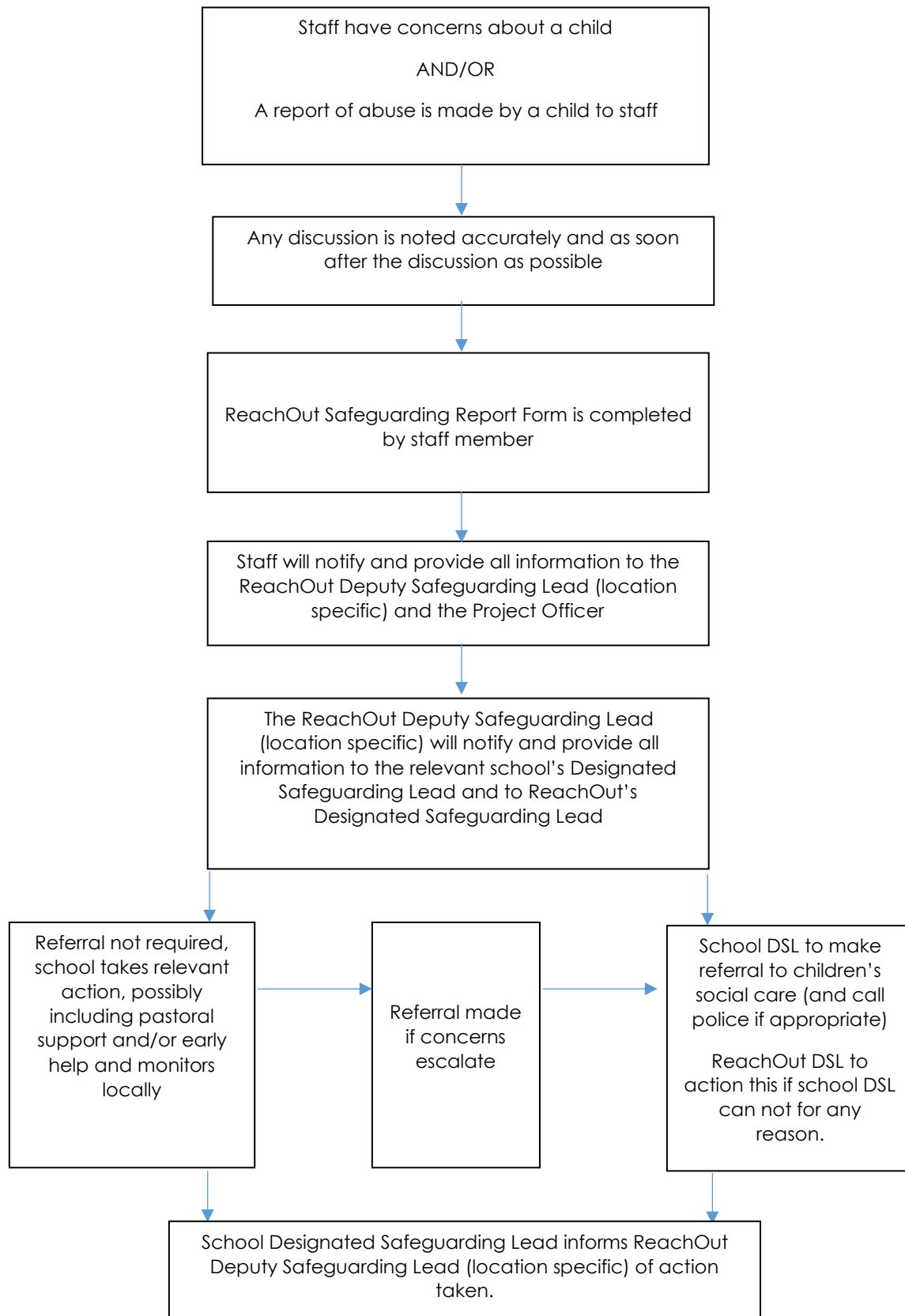
- a. The aim of our procedures is to provide a robust framework which enables staff and volunteers to take appropriate action if they are worried a child is being abused.
- b. Staff and volunteers working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, workers should always act in the best interests of the child.

- c. If workers have any concerns about a child's welfare, they should act on them immediately, following the recording and reporting procedure.
- d. See *part n and o* in this section for flow charts setting out the process for volunteers and staff when they have concerns about a child.
- e. When responding to a divulged concern, ReachOut workers must communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children / young people with special needs and when the preferred language is not English. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.
- f. ReachOut workers should reassure victims that they are being taken seriously. ReachOut workers should never make the victim feel ashamed, or give the impression that the victim is creating a problem by reporting abuse, sexual violence or sexual harassment. The initial response to a report from a child is extremely important and can encourage or undermine the confidence of future victims to come forward.
- g. As ReachOut works in partnership with host schools, it is our staff's duty to report concerns to the school DSL as well as ReachOut's Deputy and Designated Safeguarding Leads.
- h. DSLs at partner schools will take appropriate action and report back to ReachOut's Deputy and/or Designated Safeguarding Leads on the outcomes of the action taken and any further action to be taken by ReachOut staff.
- i. ReachOut workers should refer to their safeguarding training documents for guidance on how to respond to both causes for concern and reports of abuse.
- j. ReachOut's Designated Safeguarding Lead and deputies should always be available to discuss safeguarding concerns. If in exceptional circumstances, the Designated Safeguarding Lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the Senior Management Team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or deputy) as soon as is practically possible.
- k. Workers should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) offer guidance to staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. 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.
- l. ReachOut workers may be required to support the relevant partner school and other agencies and professionals.
- m. Where there is a conflict of interest between a child and an adult, the welfare and interests of the child must be paramount.**
- n. Where a child is in/at risk of immediate harm, ReachOut staff must make a referral to children's social care and if appropriate, the police. Referrals should follow the local referral process.**
- o. Recording and reporting safeguarding concerns for volunteers:





p. Recording and reporting safeguarding concerns for ReachOut staff



## 7. Early Help

- Any child may benefit from early help, but all ReachOut staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
  - has special educational needs (whether or not they have a statutory education, health and care plan);
  - is a young carer;
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
  - is frequently missing/goes missing from care or from home;
  - is misusing drugs or alcohol themselves;
  - Is at risk of modern slavery, trafficking or exploitation;
  - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
  - has returned home to their family from care;
  - is showing early signs of abuse and/or neglect;
  - is at risk of being radicalised or exploited;
  - is a privately fostered child.
- b. All staff are aware of the Early Help process and understand their role within it. This includes identifying emerging problems, liaising with the school's DSL and sharing information with other professionals to support early identification and assessment.

## **8. Consent**

- a. In all but the most exceptional circumstances, partner schools must make parent/carers aware of the concerns for their child at the earliest possible stage. In the event of a referral to Children's Social Care, parents will be informed unless there is a valid reason not to do so; for example, if to do so would put a child at risk of harm and/or would undermine a criminal investigation.

## **9. Record Keeping**

- a. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing on a ReachOut Safeguarding Report Form. Information should be kept confidential and stored securely. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).
- b. Records should include:
- i. A clear and comprehensive summary of the concern;
  - ii. Details of how the concern was followed up and resolved;
  - iii. A note of any action taken, decisions reached and the outcome.
- c. All recordings related to safeguarding issues must be made on the appropriate form. No reference should be put on any general monitoring forms / record sheets, which are normally open to a large number of people.
- d. Where abuse is suspected or witnessed, it is important to record information accurately and fully on the ReachOut Safeguarding Report Form (If you do not have access to the form, workers should still record the information immediately either by hand or a password protected word document.)
- e. When recording safeguarding concerns, reports or incidents, workers should take the following steps:

- Any discussion(s) with the child should be noted accurately and as soon after the discussion as possible.
  - Where an allegation involves a member of staff/volunteer, it is preferable that two members of staff or a senior member of staff is present when taking details of the allegation.
  - Remember that an allegation of child abuse may lead to a criminal investigation so don't do anything that may jeopardise a police investigation such as asking leading questions or attempting to investigate the allegations of abuse.
  - Communicate with the young person in a way that is appropriate to their age, understanding and preference. This is especially important for children / young people with special needs and when the preferred language is not English.
  - Where concerns arise as a result of information given by a child / young person, it is important to reassure the young person but not to promise confidentiality.
- f. Every incident should be recorded by the Deputy Designated Safeguarding Lead as a Safeguarding Log on Salesforce as soon after the incident is reported as possible.
- g. The Designated Safeguarding Lead will review the safeguarding log on Salesforce monthly to ensure that all incidents are being recorded and dealt with appropriately.
- h. All subsequent actions should be added to the safeguarding log on Salesforce.
- i. The Safeguarding Log report is reviewed quarterly by the Delivery Sub Committee of the Board of Trustees.

## **10. Information Sharing**

- a. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. As part of meeting a child's needs, we must recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that set out clearly the process and principles for sharing information within ReachOut and with the three safeguarding partners (local authority, local clinical commissioning group and chief officer of police), other organisations, agencies and practitioners as required. Staff and volunteers should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.
- b. ReachOut is aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- c. 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.

## **11. Inter-agency Working**

- a. ReachOut recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance (WTSC), both to ensure children's needs are met and to protect them from harm.
- b. ReachOut is not the investigating agency when there are child protection concerns and will therefore pass all concerns and incidents on to partner schools who will pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment process as

required, and recognise that a crucial part of this may be in supporting the child while these take place.

- c. Regional Project Managers will work to establish strong and co-operative relationships with partner schools to ensure all young people referred to ReachOut's mentoring programme are safeguarded.
- d. The Senior Management Team, including the Designated Safeguarding Lead will work to establish strong and co-operative relationships with relevant professionals in other agencies.

## **12. Complaints**

- a. ReachOut has a Complaints Policy which is available to all beneficiaries, volunteers and members of staff and parents who wish to report concerns. This document can be found on ReachOut's website.
- b. All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific procedures for Managing Allegations against Staff (Section 17 of this policy).

## **13. Staff and Volunteer Induction, Awareness and Training**

- a. All members of ReachOut staff are provided with a copy of Keeping Children Safe in Education, 2021 which provides an overview of safeguarding duties and responsibilities. ReachOut staff not working directly with children are required to read Annex A of the guidance, alongside the ReachOut Safeguarding and Child Protection Policy and procedures, whilst staff working directly with children should read the full guidance.
- b. Trustees, Senior Management Team and all members of staff working directly with children must also read ReachOut's Safeguarding and Child Protection Policy and procedures as part of their induction and after any changes made.
- c. ReachOut's DSL ensures that all new staff are appropriately inducted in ReachOut's internal safeguarding procedures and communication lines.
- d. ReachOut's DSL ensures that all new staff working directly with children complete internal (online) and external (classroom-based) safeguarding training which will enable them to:
  - Recognise potential safeguarding and child protection concerns involving pupils and adults (colleagues, other professionals and parents/carers)
  - Respond appropriately to safeguarding issues and take action in line with this policy
  - Record concerns in line with ReachOut and their designated schools' policies
  - Refer concerns to the DSL and/or Deputy Designated Safeguarding Leads and be able to seek external support if required
- e. All staff members working directly with children will receive regular safeguarding and child protection updates by attending regular workshops/trainings/bulletins as required, but at least annually to provide them with the relevant skills and knowledge to safeguard children effectively.
- f. All ReachOut volunteer mentors must complete internal (online) safeguarding training as well as live face-to-face or virtual safeguarding training (via induction mentor training) before being assigned to become a mentor to a young person.
- g. All staff and volunteers assigned to an individual school will be made aware of that school's expectations and procedures for safeguarding their pupils.

- h. The DSL will maintain an up to date register of who has received safeguarding and child protection training and at what level and will provide an annual update to the Board of Trustees as part of each end of year safeguarding report.
- i. All members of the Board of Trustees will be provided with appropriate safeguarding training which covers their specific strategic responsibilities annually.

#### **14. Safe Working Practice**

- a. All ReachOut staff and volunteers are required to work within ReachOut's Code of Conduct.
- b. Staff and volunteers must be aware that children may make allegations against them where they feel vulnerable or where they perceive there to be possible risk to their welfare. As such, to minimise the risk, staff and volunteers will adhere to the following guidelines:
  - Workers should never put themselves in a situation where they are on their own with a child/children.
  - Workers should avoid direct physical contact i.e. cuddling, kissing, patting on knee, etc. with any child.
  - Workers should avoid any unnecessary form of physical contact with young people.
  - Physical intervention should only be used when the child is endangering themselves or others and such events should be recorded and signed by a witness. Staff should be aware of ReachOut and the school's behaviour management policies.
  - First Aid should normally only be administered while another adult witness is present.
- c. ReachOut understands the additional vulnerability of children with special educational needs and disabilities and will ensure positive and proactive behaviour support to reduce the occurrence of risky behaviour and the need to use restraint.
- d. Full advice and guidance can be found in *Guidance for Safer Working Practice for Adults Who Work with Children and Young People in Education Settings (2015)*
- e. Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social networking sites etc.) and should familiarise themselves with advice and professional expectations outlined in *Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings*, ReachOut's Online Safety policy and Volunteer Policy and each partner school's Online Safety Policy.
- f. During ReachOut sessions:
  - i. There must always be more than one worker for any regular activity with young people aged 16 and under, including group work, no matter how small the group
  - ii. There must always be at least one worker 18 years old or above
  - iii. Workers should avoid situations where they are on their own with a young person, out of sight of other adult workers. This is particularly important during indoor work, where workers are running activities in different rooms, when moving a group from one room to another and at the beginning and end of the activity.
- g. An attendance register of both young people and volunteer mentors should be completed.
- h. The following guidelines are absolute minimums. When assessing how many workers are needed, workers', young people's safety must be taken into consideration first and then the ability to look after property / buildings being used and workers increased appropriately to ensure this.

- i. Recommended numbers of workers to young people according to their age:
  - i. In a building:
    - For young people aged 9 to 15 years old – 2 workers for the first 14 young people followed by 1:10
    - For young people aged 16 and over – 2 workers for the first 20 young people, followed by 1:12
  - ii. On trips out:
    - For young people aged 10 to 15 years old – 2 workers for the first 14 young people followed by 1:8
    - For young people aged 16 and over – 2 workers for the first 16 young people, followed by 1:12 (Note; number of workers may depend on number of vehicles in use)
  - iii. Residential trips:
    - For young people aged 10 to 15 years old – 2 workers for the first 10 young people followed by 1: 6
    - For young people aged 16 and over – 2 workers for the first 12 young people followed by 1: 8
    - On residential trips, there **MUST** be a worker of the same gender as the young people present.
- j. If a young person needs to speak to a worker privately, this request should usually come from the young person and the worker should assess it carefully; e.g. is it genuinely because they want to discuss something important, which would be difficult in a busier place? In the event that a worker considers it appropriate to speak with a young person alone, they should **FIRST** inform their Project Leader (if involving a volunteer) and make sure this is still done within full view of the Project Leader.
- k. A Project Leader should also have any private conversations in full view of other adults.
- l. All young people in the care of ReachOut workers **MUST** have a consent form (including emergency and medical details) signed by a parent or guardian to participate in all project activities (including sessions, trips out and residential trips).
- m. For trips out, an attendance register should be completed for all young people in the building, as they enter, for Health and Safety purposes which must be easily accessible in an emergency.
- n. Volunteers, particularly those under the age of 18, should never work unsupervised and should be given clear guidance and support. Appropriate application procedures should be followed as outlined in Section 15 and 16.
- o. Casual adult visitors to project sessions, including parents/guardians/older siblings, funders i.e. those who have not been authorised as staff or volunteers, should not have access to young people without the presence of a worker who is deemed to be responsible for the work.
- p. Workers should treat all young people with respect and dignity at all times, expecting, hoping for and looking for the best in young people; holding them in unconditional positive regard, even if the workers are not receiving the same treatment in return. Workers convey this through the way they use their bodies, their language and the way they listen to and work with young people.
- q. Workers communicate respect of young people firstly through body language. Workers should be aware of the way they use their bodies, the attitudes they convey through their body language and how they locate themselves physically in relation to young people. The worker's aim is to

communicate their interest in, availability and willingness to listen to young people, without being intrusive or threatening. Whilst with young people, workers should seek to give their undivided attention and interest to young people, reflecting the positive regard in which we hold them.

- r. Touch is an important part of human relationships: for example, it can be necessary to stop a young person from hurting themselves or others; it can also be a natural way of responding to someone in distress or in celebration. Workers should be sensitive to what both they and the young person / young people may consider is appropriate physical contact in each situation, both in general terms, and in relation to a specific individual. Workers need to be conscious of situations in which their actions, however well intended, could be harmful or misconstrued by others. Where possible and in an appropriate way, a worker should introduce how they are going to touch with a young person and should seek permission (either verbally or non-verbally) where possible.
- s. If a young person sends out any kind of signal that they are uncomfortable with the contact a worker is engaged in with them, it is really important that the worker refrain from contact immediately, however foolish this may make the worker feel / appear, except in the case where a worker is restraining a young person from harming themselves or someone else.
- t. Workers should seek to minimise and not prolong any physical contact with young people and they should not encourage young people to engage in prolonged physical contact with them.
- u. Workers should not instigate rough game playing with young people and should seek to limit and extricate themselves from any such games instigated by young people, whilst recognising that this is a natural part of development.
- v. Workers should NEVER enter into sexually provocative games with young people.
- w. Workers may use no more than reasonable force in order to protect a young person or worker in a critical situation. This should be recorded in the incident book.
- x. How we speak can be more important than what we say, so in general conversation, workers need to consider the tone of their voice, keeping it calm, not shouting/ raising their voice in anger, but keeping it low, speaking slowly and in a controlled manner. Worker should ensure that the language they use is easily understood by the young people they are working with, and they should not use language that is sarcastic, threatening or superior.
- y. Workers should not engage in any of the following:
  - invading the privacy of young people through intrusive questioning.
  - making sexually suggestive comments about or to a young person, even in fun.
  - any scapegoating, ridiculing, sarcasm, or rejecting a young person, or making them look stupid.
  - allowing young people to involve us in excessive attention seeking through long conversation.
- z. During residential/overnight trips:
  - i. Workers should not share sleeping accommodation with young people, except in the unlikely event where not doing so puts young people in a dangerous or vulnerable position. In this instance, a decision should be taken with the Programmes Director as to whether to continue with the trip and how to manage this situation.
  - ii. It may be appropriate for two or more workers to share sleeping accommodation with young people in a large hall / room (e.g. sleepover on an Outward Bound activity). Ideally this would be with a single sex group. If the group is mixed gender, workers should consult with the Programmes Director about the appropriateness of this, in relation to the age and development of the young people and any safeguarding concerns. In this event, young men and young women should each have separate sleeping areas / rooms with two



workers of the same gender as the young people in each area / room. Workers should sleep in a separate, clearly marked part of the room from the young people. Under no circumstances should one worker be left alone in the sleeping accommodation with a young person / young people at any time.

- iii. Wash facilities which should be separate for male/ female or have allotted times for separate male/ female use. Where possible staff should have separate facilities.
  - iv. Staff should monitor interaction between young people to ensure appropriate behaviour.
  - v. If it is necessary for a young person to return home early from a trip activity or residential, then the lead worker should make appropriate provision for the young person's transport home.
  - vi. If the young person is under 16, one worker must accompany them home if they are using public transport or two workers, if using a car or minibus.
  - vii. Staff on a day or residential trip should never be diverted from the activity to accompany a young person home, if to do so would leave the team short of workers on the trip activity / residential. This may require the lead worker to seek assistance from office staff, to travel over to accompany the young person home.
- 
- aa. Workers must manage difficult situations through negotiation and discussion and without using physical contact, abusive violent language or raised voices. In tense situations, or where a young person is upset or angry, it is important for workers to remain calm, to be a calming influence, and to promote a calming environment. Workers should never respond aggressively to a young person and should 'take time out' if necessary, alerting another worker to their need to do this.
  - bb. If a disagreement between young people escalates to violent physical contact between the young people, workers must carefully consider the risks to the young people and themselves of any intervention they may make to stop the fight / violence. Workers may use no more than reasonable force in order to protect a young person or worker in a critical situation. This should be recorded in the incident book.
  - cc. ReachOut workers should treat all colleagues with respect and dignity, reflecting the value and ethos of the charity. Under no circumstances should they ridicule, argue with or scapegoat colleagues, whether with young people or on their own.
  - dd. Wherever possible, workers should not undermine or challenge a colleague in front of a young person. Workers should deal with any disagreement about working procedure discreetly, preferably after the session, if it can wait, or discreetly during the session if not.
  - ee. If a worker sees another worker acting in ways which might be misconstrued, they should be prepared to speak to them or to the person's line manager about their concerns. Workers should encourage an atmosphere of mutual support and care which allows all workers to be comfortable enough to discuss and explore each other's practice, attitudes and behaviour. If the Project Leader is the cause of concern, and the worker feels unable to speak to them directly about this, then the worker should speak to the Project Officer.

## **15. Staff and Volunteer Supervision and Support**

- a. The Senior Management Team including the Designated Safeguarding Lead aim to create a culture and environment where members of staff feel competent and confident to raise concerns and feel supported in their safeguarding role
- b. Any member of staff or volunteer affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

- c. The induction process for project staff and volunteer mentors will include familiarisation with child protection responsibilities and procedures to be followed if members of staff and/or volunteers have any concerns about a child's safety or welfare.
- d. ReachOut will provide appropriate supervision/1:1 support for all members of staff to ensure that:
  - Staff are competent to carry out their responsibilities and support volunteer mentors in the safeguarding and promoting welfare of children.
  - All staff have regular reviews of their own practice to ensure they are providing the highest possible level of support.

## 16. Safer Recruitment

- a. ReachOut is committed to recruiting staff and volunteers who are safe to work with the children and young people referred to our programme and have their welfare and protection as the highest priority.
- b. ReachOut has Safer Recruitment procedures in place to prevent people who pose a risk of harm from working with children, in line with statutory guidance, by ensuring:
  - At least one person on any interview panel has completed Safer Recruitment Training and that interviews include at least one question related to safeguarding practice.
  - All applicants for full-time and sessional roles complete an application form, gaps in education and employment are explored and appropriate pre-appointment checks are carried out, e.g. references and DBS checks.
  - Proportionate decisions on whether to ask for any checks beyond what is required are made by the chair of the interview panel.
  - All volunteers are appropriately recruited and supervised (See ReachOut's Volunteer Policy).
- c. The Senior Management Team is responsible for ensuring that ReachOut maintains an accurate central record of all staff, volunteers and trustees that meets statutory requirements.
- d. The Board of Trustees will ensure that all members of the Senior Management Team, and other management staff responsible for recruitment and one member of the Board of Trustees complete accredited Safer Recruitment Training.
- e. We advise all staff and volunteers to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands and warnings in the application process.

## 17. Allegations Against Members of Staff and Volunteers

- a. ReachOut recognises that it is possible for staff and volunteers to behave in a way that might cause harm to children and takes seriously any allegation received.
- b. Definition of harm threshold:
  - i. Behaved in a way that has harmed a child or may have harmed a child
  - ii. Possibly committed a criminal offence against or related to a child
  - iii. Behaved towards a child/children in a way that indicates they may pose a risk of harm to children
  - iv. Behaved or may behaved in a way that indicates they may not be suitable to work with children

- c. If staff and volunteers have safeguarding concerns, or an allegation is made about another worker posing a risk of harm to children, then for allegations that may meet the harms threshold:
- i. They must report the matter immediately to the Chief Executive Officer
  - ii. If the CEO is absent, reports should be made to the Designated Safeguarding Lead or People Manager.
  - iii. The CEO, DSL or People Manager will inform children's social care, including the Local Authority Designated Officer (LADO), immediately of allegations made against staff. Where the allegation is made out of hours, the report should be made to the emergency duty team or the police.
  - iv. If neither the CEO, DSL, People Manager nor another member of the SMT is available and the matter is urgent, the member of staff or volunteer should contact children's social care or the Police directly.
  - v. In the event of allegations of abuse being made against the CEO, then staff and/or volunteers are advised that allegations should be reported to the Chair of Trustees or directly to the LADO
  - vi. The person to whom the allegation is first made should make a written record of the information (where possible in the child's /adult's own words) using the ReachOut Safeguarding Report Form.
  - vii. Where a volunteer is the subject of the allegation, they may be suspended from any further contact with ReachOut until such time as the matter has been dealt with and the Designated Safeguarding Lead and Senior Management Team have reached a final decision.
  - viii. In the case of staff, consideration may be given to suspension.. It should be considered in any case where:
    - There is cause to suspect a young person is at risk of significant harm; or
    - The allegation warrants investigation by the police; or
    - The allegation is so serious that it might be grounds for dismissal.
  - ix. If the allegations were confirmed, it would be deemed gross misconduct.
  - x. ReachOut will follow guidance agreed at any safeguarding strategy meetings that are called.
  - xi. If the allegation is substantiated and the person is dismissed, the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide their services, ReachOut should agree with local authority services further action to be taken and by whom.
  - xii. ReachOut must inform the Charity Commission in the event that a member of staff is dismissed or leaves their employment as a result of having harmed a child or is considered a risk of harm
  - xiii. ReachOut has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff or volunteer has committed one of a number of listed offences, and who has been removed from working (paid or unpaid).
- d. Low level concerns (concerns that don't meet the harm threshold)
- i. ReachOut will ensure that there is an open and transparent culture to allow any concern, no matter how small, to be raised. Concerns may arise in varied ways e.g. suspicion, complaint, disclosure made by a child, parent or other adult. All concerns raised must be shared responsibly, managed and recorded, and appropriate action taken
  - ii. Examples of low level concerns could be:
    - Behaviour that is inconsistent with the code of conduct, including inappropriate conduct outside work
    - Being over friendly with children, not maintaining appropriate boundaries for mentee-mentor relationships
    - Having favourites
    - Taking photographs of children on their phone

- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
  - Using inappropriate sexualised, intimidating or offensive language
- iii. Through training and induction of staff and volunteers, ReachOut will ensure that staff and volunteers are clear on what appropriate behaviour is and what boundaries must be maintained, whilst empowering staff and volunteers to share low-level concerns and address unprofessional behaviour
- e. Recording and responding to low level concerns
    - i. Low-level concerns should be recorded in writing and passed on to the Regional DSL And the DSL straight away. Records should be stored confidentially, and should detail the concern, the context and the action taken
    - ii. Records should be reviewed regularly by the DSL to learn from potential patterns of concerning or inappropriate behaviour
    - iii. Once a concern has been raised, the Regional DSL should speak directly to the person who raised the concern as well as the individual involved and any witnesses, to collect as much evidence as possible. This information will determine what further action is needed
    - iv. The Regional DSL should inform the relevant school of the concern straight away and the further action being taken

## 18. Whistleblowing

- a. Whistleblowing is when an employee raises a concern about malpractice or a dangerous activity that they are aware of through their work. ReachOut encourages staff to raise concerns about safeguarding young people with us in the first instance.
- b. Staff should follow ReachOut procedures in the Whistleblowing Policy.

## 19. Children in Specific Circumstances

- a. Child on child abuse (allegations of abuse made against other children)
  - i. All ReachOut workers recognise that children are capable of abusing their peers, and that it can happen in school, outside of school and online. ReachOut believes that abuse is abuse and it will never be tolerated, dismissed or minimised. Any incidents of child on child abuse will be managed in the same way as any other child protection concern and will follow the same procedures. We will seek advice and support from other agencies as appropriate.
  - ii. ReachOut will take steps to minimise the risk of all forms of child on child abuse, ensuring staff understand the importance of challenging inappropriate behaviour between peers and do not downplay or dismiss certain behaviours which could lead to a culture of unacceptable behaviour and an unsafe environment.
  - iii. Child on child abuse can take many forms, including (but limited to) bullying, cyberbullying, gender-based abuse, hazing (initiation type violence), sexually harmful behaviour and violence and consensual or non-consensual sharing of nude and semi-nude images and/or videos. ReachOut is mindful that some potential issues may be affected by the gender, age, ability and culture of those involved.
  - iv. See Appendix 1 for how child on child abuse may manifest.
- b. Safeguarding Children with Special Educational Needs and Disabilities
  - i. All ReachOut workers recognise that children with Special Educational Needs and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. Additional barriers can exist when recognising abuse and neglect in the group of children. This can include:

- Being more prone to peer group isolation than other groups and being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability rather than abuse or neglect.
- Speech, language and communication needs which may make it difficult to tell others what is happening.
- ReachOut will ensure that children with SEND, specifically those with communication difficulties will be supported so that their voice is heard and acted upon.

#### c. Online Safety

- ReachOut recognises that the use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation. Technology often provides the platform that facilitates harm. The DSL and Senior Management have read annex D regarding Online Safety within *KCSIE, 2021*.
- ReachOut recognises three areas of risk:
  - Content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
  - Contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
  - Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
- ReachOut recognises the specific risks that can be posed by mobile phone and cameras. Therefore, young people and volunteer mentors are instructed to not use their mobile phones during ReachOut mentoring sessions – this is monitored by Project Leaders.
- Should ReachOut mentoring sessions require the use of internet connectivity, the school's devices are to be used, that have appropriate filters and monitoring systems in place.
- For ReachOut Home sessions, additional training is provided to volunteers regarding the processes for seeking support from their Project Leader in the event of a safeguarding concern, utilising the zoom functionality. Additional measures are in place to safeguard children in these zoom sessions, including waiting rooms, changing the zoom links half-termly, and (limiting access to certain functionality that volunteers can use?).
- The Department has provided additional advice on [safeguarding and remote education](#).
- ReachOut will ensure that the requirement for staff to undergo regular updated safeguarding training will include online safety training.

#### d. Contextual Safeguarding

- Safeguarding incidents and/or behaviours can be associated with factors outside the school/ReachOut sessions and/or can occur between children outside the school/ReachOut sessions.
- All staff, but especially the Designated Safeguarding Lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.
- Contextual Safeguarding consists of 4 component parts:
  - Target: seeks to prevent, identify, assess and intervene with the social conditions of abuse
  - Legislative framework: incorporate extra-familial contexts into child protection frameworks
  - Partnerships: develop partnerships with sectors/individuals who are responsible for the nature of extra-familial contexts

- Outcomes measurement: monitor outcomes of success in relation to contextual, as well as individual, change
- iv. Children's social care assessments should consider such factors so it is important that as much information as possible is provided as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

## **20. Monitoring and Review**

- a. All ReachOut staff and volunteers will have access to a copy of this policy.
- b. This policy has been updated in April 2022 to reflect the new guidance and legislation issued in relation to safeguarding children and promoting their welfare.
- c. The policy will be reviewed annually and additionally in line with any updates or changes to statutory guidance and legislation.
- d. All new staff should have access to this policy and sign to the effect that they have read and understood its contents.
- e. The DSL will review the policy following any child protection concerns (including following learning identified from serious case reviews) or allegations against staff or volunteers to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.

## 21. ReachOut Contacts

### a. ReachOut Designated Safeguarding Leads

#### Alice Cleary

Contact number: 07963 876538

Email: [alice.cleary@reachoutuk.org](mailto:alice.cleary@reachoutuk.org)

#### Joy Upchurch

Contact number: 07840 021701

Email: [joy.upchurch@reachoutuk.org](mailto:joy.upchurch@reachoutuk.org)

### b. ReachOut Deputy Safeguarding Leads

#### Ella Downs - London

Contact number: 07929 731130

Email: [ella.downs@reachoutuk.org](mailto:ella.downs@reachoutuk.org)

#### Nicole Burgess - London

Contact number: 07929 731120

Email: [nicole.burgess@reachoutuk.org](mailto:nicole.burgess@reachoutuk.org)

#### Mehmet Aygun - London

Contact number: 07903 552776

Email: [mehmet.aygun@reachoutuk.org](mailto:mehmet.aygun@reachoutuk.org)

#### Jess Morgan - North West

Contact number: 07584 667215

Email: [jessica.morgan@reachoutuk.org](mailto:jessica.morgan@reachoutuk.org)

#### Ruth Butler - North West

Contact number: 07714 037255

Email: [ruth.butler@reachoutuk.org](mailto:ruth.butler@reachoutuk.org)

### c. ReachOut Regional Office Contact Details

London: 244-254 Cambridge Heath Road, E2 9DA  
0203 489 9797

Manchester:

Beehive Lofts, Beehive Mill, Jersey Street, Manchester, M4 6JG

0161 883 2191

## 22. Local/Regional Support

The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children's social care contact number.

### a. London

#### i. City & Hackney Safeguarding Children Board

General Email: [chscb@hackney.gov.uk](mailto:chscb@hackney.gov.uk)

LADO Email: [lado@hackney.gov.uk](mailto:lado@hackney.gov.uk)

Telephone: 0208 356 4183

Hackney FAST: 0208 356 5500

Out of Hours: 0208 356 2710

Hackney FAST Email: [fast@hackney.gov.uk](mailto:fast@hackney.gov.uk)

#### ii. Tower Hamlets Health and Social Care (Child protection)

Telephone: 020 7364 5006

#### iii. Haringey Council Social Services (Child Protection)

Telephone: 020 8489 4470

Out of hours: 020 8489 0000

Email: [spa@haringey.gcsx.gov.uk](mailto:spa@haringey.gcsx.gov.uk)

#### iv. Camden Social Care and Health (Safeguarding children)

Telephone: 020 7974 3317

Out of Hours No.: 020 7974 4444

#### v. Islington Children's Services Contact Team

Telephone: 0207 527 7400

Out of hours: 020 7226 0992

Email: [csctreferrals@islington.gov.uk](mailto:csctreferrals@islington.gov.uk)



- vi. Lambeth Safeguarding children board
  - Telephone: 020 7926 5555
  - Email: [helpandprotection@lambeth.gov.uk](mailto:helpandprotection@lambeth.gov.uk)
  
- vii. Bromley MASH team
  - Telephone: 020 8461 7373/7309
  - Out of hours: 0300 303 8671
  - Email: [mash@bromley.gov.uk](mailto:mash@bromley.gov.uk)
  
- viii. Barnet MASH team
  - Telephone: 020 8359 4066
  - Out of hours: 020 8359 2000
  
- ix. Enfield MASH team
  - Telephone: 020 8379 5555
  - Out of hours: 020 8379 1000
  
- x. Kingston and Richmond Children's Services
  - Telephone: 020 8547 5008
  - Out of hours: 020 8770 5000
  
- xi. Redbridge Children's Services
  - Telephone: 020 8708 3885
  - Out of hours: 020 8708 5897
  - Email: [CPAT.referrals@redbridge.gov.uk](mailto:CPAT.referrals@redbridge.gov.uk)
  
- xii. Newham MASH team
  - Telephone: 020 3373 4600
  - Out of hours: 020 8430 2000
  
- b. Manchester
  - i. Manchester Children's Services
    - Telephone: 0161 234 5001

Email:

[mcsreply@manchester.gov.uk](mailto:mcsreply@manchester.gov.uk)

ii. Oldham MASH (Multi-Agency Safeguarding Hub)

Telephone: 0161 770 7777

Email: [child.mash@oldham.gov.uk](mailto:child.mash@oldham.gov.uk)

iii. Salford (Bridge Partnership)

Telephone: 0161 603 4500

Out of hours: 0161 794 8888

iv. Trafford Children's First Response

Telephone: 0161 912 5125

Out of hours: 0161 912 2020

c. Liverpool

i. Liverpool CARELINE

Telephone: 0151 233 3700

ii.

d. Nottingham

i. Nottingham Children's Social Care

Telephone: 0115 876 4800

e. Leeds

i. Leeds Children's Social Work Services

Telephone: 0113 376 0336

Out of hours: 0113 535 0600

## 23. Key Supporting Documents

- a. Working Together to Safeguard Children (DfE July 2018)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779401/Working\\_Together\\_to\\_Safeguard-Children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf)
- b. Keeping Children Safe in Education (DfE September 2021)
  - c. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1021914/KCSIE\\_2021\\_September\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf)
- d. London Safeguarding Children Procedures (March 2018)  
<http://www.londoncp.co.uk>
- e. Voluntary safeguarding code of practice – Draft guidance for out-of-school settings providers (December 2018)  
[https://consult.education.gov.uk/regulatory-framework-unit/out-of-school-settings-voluntary-safeguarding-code/supporting\\_documents/Voluntary%20safeguarding%20code%20of%20practiceDraft%20guidance.pdf](https://consult.education.gov.uk/regulatory-framework-unit/out-of-school-settings-voluntary-safeguarding-code/supporting_documents/Voluntary%20safeguarding%20code%20of%20practiceDraft%20guidance.pdf)
- f. Female Genital Mutilation Act 2003 (S. 74 – Serious Crime Act 2015)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)
- g. Criminal Exploitation of children and vulnerable adults – county lines guidance (Home Office 2018)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/741194/HOCountyLinesGuidanceSept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf)
- h. Preventing youth violence and gang involvement (Home Office 2015)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418131/Preventing\\_youth\\_violence\\_and\\_gang\\_involvement\\_v3\\_March2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf)
- i. Multi-agency practice guidelines: Handling cases of Forced Marriage (June 2014)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322307/HMG\\_MULTI\\_AGENCY\\_PRACTICE\\_GUIDELINES\\_v1\\_180614\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf)

## Appendix 1 – Definitions and Indicators of Abuse

1. Although these signs do not necessarily indicate that a young person has been abused, they may help adults recognise that something is wrong. The possibility of abuse should be considered if a young person shows a number of these symptoms, or any of them to a marked degree.
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.

Signs that may indicate physical abuse:

- Unexplained recurrent injuries or burns
- Improbable excuses or refusal to explain injuries
- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for P.E/sports
- Bald patches
- Chronic running away
- Fear of medical help or examination
- Self-destructive tendencies
- Aggression towards others
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive (such as being beaten every night to 'make him study')
- Fear of suspected abuser being contacted

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

Signs that may indicate emotional abuse:

- Physical, mental and emotional development lags
- Sudden speech disorders
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Neurotic behaviour (rocking, hair twisting, self-mutilation)
- Extremes of passivity or aggression

4. Sexual Abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. This policy should be read alongside additional advice in [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#).

Signs that may indicate sexual abuse:

- Being overly affectionate or knowledgeable in a sexual way inappropriate to the young person's age
  - Medical problems such as chronic itching, pain in the genitals, venereal diseases
  - Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
  - Personality changes such as becoming insecure or clinging
  - Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
  - Sudden loss of appetite or compulsive eating
  - Being isolated or withdrawn
  - Inability to concentrate
  - Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder
  - Starting to wet again (day or night), nightmares
  - Become worried about clothing being removed
  - Suddenly drawing sexually explicit pictures
  - Trying to be 'ultra-good' or perfect; overreacting to criticism
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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
  - protect a child from physical and emotional harm or danger;
  - ensure adequate supervision (including the use of inadequate care-givers); or
  - ensure access to appropriate medical care or treatment.
  - It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that may indicate neglect:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Untreated medical problems
- No social relationships
- Compulsive scavenging
- Destructive tendencies

## Appendix 2 – Specific Safeguarding Issues

(See also Annex B of Keeping Children Safe in Education, 2021)

- **Safeguarding children with special educational needs and disabilities**

ReachOut acknowledges that children with special educational needs and disabilities can face additional safeguarding challenges as they may have impaired capacity to resist or avoid abuse.

ReachOut staff are aware of the additional barriers which exist recognising abuse and neglect in this group of children, these include:

Being more prone to peer group isolation than other groups and being disproportionately impacted by things like bullying, without outwardly showing signs of being bullied

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability rather than abuse or neglect

Speech, language and communication needs which may make it difficult to tell others what is happening.

All ReachOut staff will ensure that children with special education needs and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

- **Child sexual exploitation (CSE)**

All ReachOut staff are aware of the most up to date definition of CSE:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

ReachOut identifies that CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

All staff and volunteers and ReachOut recognise that children at risk of CSE need to be identified and issues relating to CSE should be approached in the same way as protecting children from other risks. They are aware that sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation may involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, consensual and non-consensual sharing of nude and semi-nude images and/or videos, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse or recognise this as abuse.

We understand that a significant number of children who are victims of CSE go missing from home, care and education at some point. ReachOut is alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns.

Like all forms of child sexual abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;

- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child 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 do not take part in education.

- **So-called 'honour-based violence' (including Female Genital Mutilation and forced marriage)**

Staff and volunteers at ReachOut are aware that so called 'Honour-based' violence (HBV) encompasses a range of crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

The indicators of HBV and associated factors will be covered with staff within internal and external safeguarding training. All members of staff are alert to the possibility of a child being at risk of HBV, or already having suffered HBV. All members of staff are aware that all forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. Staff will speak with DSL if they are concerned about HBV.

All members of staff will follow the individual schools' and local children safeguarding board's procedures.

Female Genital Mutilation (FGM):

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision, cutting or sunna. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence. There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

Staff and volunteers should be alert to the following indicators:

- Difficulty walking, sitting or standing and may even look uncomfortable
- Spending longer than normal in the toilet due to difficulties urinating
- Long periods of time away from a classroom during the day with bladder or menstrual problems
- Frequent urinary, menstrual or stomach problems
- There may be prolonged or repeated absences from school or college
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.

- A girl may be particularly reluctant to undergo normal medical examinations
- A girl may confide in a professional
- A girl may ask for help, but may not be explicit about the problem due to embarrassment or fear
- A girl may take about pain or discomfort between her legs
- Staff or volunteers may become aware of child because she appears anxious, depressed and emotionally withdrawn. They may be presented with a sudden decline in her performance, aspirations or motivation.

Any information or concern that a child is at immediate risk of or has undergone FGM will result in an immediate child protection referral to the local children's services team. Staff should be alert to the need to act quickly and not to mediate with or alert parents to professional' concerns.

#### Forced Marriage:

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

The Forced Marriage Unit has published guidelines (see Section 23 of this policy). Staff should report concerns regarding forced marriage to the DSL at the relevant partner school who will contact the Forced Marriage Unit if they need advice or information.

#### • **Extremism and radicalisation**

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

Extremism is defined as the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people, serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

ReachOut recognises its duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people being drawn into terrorism'.

ReachOut recognises that exposure of children (and adults) to extremist ideology can hinder their social development and educational attainment alongside posing a significant risk that they could support or partake in acts of violence.

All ReachOut workers recognise that children exposed to radicalisation and extremism should be protected and safeguarded in the same way as protecting children from other risks.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).



It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately.

ReachOut will ensure of members of staff complete an approved training package which includes guidance on how to identify people who may be vulnerable to being drawn into terrorism. This includes Home Office training on the Prevent Duty.

Indicators of vulnerability to radicalisation **(this is not exhaustive nor does it mean that all young people experiencing the below are at risk of radicalisation for the purposes of violent extremism)**:

- Identity Crisis – the young person is distanced from their cultural/religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the young person may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the young person's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the young person may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;
- Special Educational Needs – young people may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Processing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeing to join extremist organisations; and
- Significant changes to appearance and/or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Channel is a support programme focused on providing support at an early stage to people identified as vulnerable to being drawn into terrorism. Prevent referrals can be passed to a multi-agency Channel panel who will consider appropriate support. An individual's engagement is voluntary at all stages.

- **Child on child abuse**

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

- bullying (including cyberbullying);
- abuse in intimate personal relationships between peers;
- 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 physical abuse);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone 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;

- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery); and
- initiation/hazing type violence and rituals

a. Bullying/cyber bullying:

Bullying is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Bullying can take different forms. It could include:

- physical bullying: hitting, slapping or pushing someone
- verbal bullying: name calling, gossiping or threatening someone
- non-verbal abuse: hand signs or text messages
- emotional abuse: threatening, intimidating or humiliating someone
- exclusion: ignoring or isolating someone
- undermining, constant criticism or spreading rumours
- controlling or manipulating someone
- making silent, hoax or abusive calls
- racial, sexual or homophobic bullying
- bullying someone because they have a disability.

Cyber-bullying is bullying that takes place online. Unlike bullying in the real world, online bullying can follow the child wherever they go, via social networks, gaming and mobile phone.

Cyber-bullying can include:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- trolling – the sending of menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- shaming someone online
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- sending explicit messages, also known as sexting
- consensual and non-consensual sharing of nude and semi-nude images and/or videos
- pressuring children into sending sexual images or engaging in sexual conversations.

- **Serious Youth Violence**

All workers should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, 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, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should 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 having been involved in offending, such as theft or robbery.

- **Gangs, County Lines, Violent Crime and Exploitation**

ReachOut recognises the impact of gangs, county lines, violent crime and exploitation on children and young people. We recognise that our initial response is important and so staff will take concerns and allegations seriously and work in ways that support children and keep them safe.

All staff have been trained to recognise the need to be vigilant for the signs that may include, but not exclusively:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
- Increased absence from school.
- Going missing for periods of time or regularly coming home late.
- Change in friendships/relationships with others/groups; association with other children involved in exploitation.
- Significant decline in performance.
- Signs of self-harm/significant change in wellbeing.
- Signs of assault/unexplained injuries.
- Misuse of drugs and alcohol.
- Involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- Have been the victim or perpetrator of serious violence.

b. **Child Criminal Exploitation and County Lines:** Criminal exploitation of children is a geographically wide-spread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county 81 lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>102</sup> should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

It is important note that the experiences of girls who are criminally exploited can be very different to that of boys, and therefore the indicators may be different. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

- **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet, and includes:

- Unauthorised access to computers

- Denial of Service attacks or 'booting'
- Making, supplying or obtaining malware

Children with skill or interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. Concerns about a child in this area can be referred to the Cyber Choices programme.

- **Modern slavery**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

The Modern Slavery Statutory Guidance contains further information on identifying signs of a victim of modern slavery, the support available and how to refer a victim to the National Referral Mechanism.

- **Domestic abuse**

Domestic abuse can take many forms, including psychological, physical, sexual, financial and emotional. ReachOut recognises that exposure to domestic abuse can have a serious, long-term emotional and psychological impact on children. We work with other key partners and will share relevant information where there are concerns that domestic abuse may be an issue for a child or family or be placing a child at risk of harm.

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. This statutory definition ensures that different types of relationships and different types of abuse are captured, including physical, emotional and economic abuse and coercive and controlling behaviour.

- **Mental health**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. ReachOut workers should not attempt to make a diagnosis of a mental health problem but are well placed to identify children whose behaviour suggests they may be experiencing mental health difficulties or be at risk of developing a mental health problem.

If a ReachOut worker has a mental health concern about a child that is also a safeguarding concern, or if a disclosure of a mental health issue is made by a child, the reporting process outlined in *Section 6 – Safeguarding and Child Protection procedures, part n and o* should be followed.