

# REACHOUT

ReachOut Safeguarding Policy and Procedures

Version: 11.1

Last reviewed: December 2025 with update below April 2026

Policy owner: Alice Cleary

## **Update April 2026**

This policy should be considered alongside the recently published Working Together to Safeguard Children (2026). We acknowledge this updated statutory guidance and confirm that it will be utilised to inform our safeguarding practice.

The updated guidance will be fully incorporated into this policy at the next full review point, with publication planned for December 2026. However, the core safeguarding principles and arrangements set out within this document remain in line with our statutory responsibilities and our commitment to safeguarding and promoting the welfare of children.

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## 1. Reporting a concern and contact details

- a. Safeguarding concerns can be reported using our online form: [www.reachoutuk.org/safeguarding](http://www.reachoutuk.org/safeguarding). Responses are monitored by our DSL and deputies during office hours. You can also email the safeguarding team at [safeguarding@reachoutuk.org](mailto:safeguarding@reachoutuk.org).
- b. In an emergency, for example when a crime has been committed or is about to be committed, contact the police on 999 or 101 for non-emergency enquires.

### ReachOut contacts

- c. ReachOut Designated Safeguarding Lead

#### **Alice Cleary**

Contact number: 07379096203

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

- d. ReachOut Deputy Safeguarding Leads

#### **Melissa Clark**

Contact number: 07379 096448

Email: [melissa.clark@reachoutuk.org](mailto:melissa.clark@reachoutuk.org)

#### **Kiran Khela**

Contact number: 07379096232

Email: [kiran.khela@reachoutuk.org](mailto:kiran.khela@reachoutuk.org)

- e. ReachOut Regional Office Contact Details

Contact number (all locations): 0203 489 9797

Postal address: Fivefields, 8-10 Grosvenor Gardens, London, SW1W 0DH

### Local or out of hours support

Use the online tool [Report Child Abuse to Your Local Council](#) to get the contact details for the relevant local children's social care contact. Remember this is based on where the child lives, rather than where they go to school.

## 2. 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 and agency staff.
- b. The purpose of this policy is to protect children and adults at risk (collectively referred to as “young people” - see definitions for more detail) who interact with ReachOut.
- c. 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.
- d. Our safeguarding culture encourages young people to talk openly and enables them to feel confident that they will be listened to and under no circumstances should any staff member or volunteer inflict physical or psychological harm on a young person. We are committed to providing an environment where young people 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 young people receive effective support, protection and justice.
- e. ReachOut recognises that some young people may be especially susceptible to abuse due to their gender, ethnicity, sexual orientation, religious beliefs, speaking English as an additional language or their special education needs and disabilities. We understand that young people 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. Young people referred to ReachOut may exhibit challenging or concerning behaviours which at times may impact on others 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. 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 young person is being abused. Staff and volunteers are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned. When concerned about the welfare of a young person, workers should always act in the best interests of the young person. If workers have any concerns about a young person's welfare, they should act on them immediately, following the recording and reporting procedure in this document.
- g. 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 young people they are working with at all times. Safeguarding awareness is a required part of the induction process and managers must ensure all new staff 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.
- h. Breaches of this policy will be reported to the Designated Safeguarding Lead.
- i. This policy should be read in conjunction with the following documents:
  - Health and Safety Policy (including fire safety)
  - Whistleblowing Policy
  - Volunteer Code of Conduct
  - Employee Handbook

### 3. Definitions

**Safeguarding:** Keeping Children Safe in Education (2025) defines safeguarding and promoting the welfare of children as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

**Young Person:** This term is used as an overarching term throughout the policy to describe all of those that we have a safeguarding duty towards.

- Under the Children Act 1989 (2004), a child is legally defined as anyone who has not reached their 18th birthday. Child protection legislation and guidance therefore applies to our mentees (aged 9-14) and any of our volunteers who are under the age of 18.
- Under the Care Act (2014), an adult at risk is someone who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs is unable to protect themselves. Adult safeguarding guidance therefore applies to mentees, volunteers or ambassadors who meet this criteria and are 18 or over. Most commonly in our context, these individuals will be under the age of 25 hence the overarching definition of 'young person' used throughout this policy however it is important to note that they may be older.

**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.

**Designated Safeguarding Lead (DSL):** The person responsible for dealing with any safeguarding concerns within ReachOut. A deputy may often assume many of the DSLs responsibilities.

### 4. Context

- a. This policy serves as statutory guidance for all staff and volunteers working with and for ReachOut.
- b. This policy adheres to Working Together to Safeguard Children (DfE 2023) and Keeping Children Safe in Education (DfE 2025) as well as After-school clubs, community activities, and tuition Safeguarding guidance for providers (DfE 2023).
- c. This policy has been drawn up on the basis of law and guidance that seeks to protect children and adults at risk namely:
  - Children Acts 1989 and 2004
  - Data Protection Act 2018 – General Data Protection Regulation (GDPR)
  - Equality Act 2010
  - The Care Act and support statutory guidance 2023
  - Sexual Offences Act 2003
- d. 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.

## 5. Key Responsibilities

ReachOut staff and volunteers alongside partner schools and their staff have a statutory responsibility to safeguard and promote the welfare of young people 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 young people is everyone's responsibility. Everyone who comes into contact with young people and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is centred around the young person considering what is in their best interests at all times.

No single practitioner can have a full picture of a young person's needs and circumstances. If young people 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

- ReachOut's Board of Trustees holds overall responsibility for the child protection, adults at risk and safeguarding functions of ReachOut.
- The Board of Trustees will review and approve any updates and changes to our Safeguarding policy and related procedures.
- 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 young people. Our recruitment process adheres to statutory responsibilities to check adults working with young people and has recruitment and selection procedures in place.
- 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)

- ReachOut's SMT is responsible for ensuring that this Safeguarding Policy and other relevant policies and procedures are fully implemented and followed by all ReachOut workers.
- All concerns about poor or unsafe practice regarding young people 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 young people to raise concerns.
- There are robust systems in place to cover for the DSL's planned and unplanned absences, including having trained Deputy Designated Safeguarding Leads.

### c. ReachOut Workers

- All ReachOut workers have a responsibility to provide a safe environment in which young people can benefit from the programme.
- Any worker who has a concern about a young person's welfare should follow the reporting process.
- 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.
- ReachOut's Designated Safeguarding Lead will provide support to all workers carrying out their safeguarding duties and liaise closely with other services and agencies.
- As part of their induction, all workers will read and sign this policy as well as completing safeguarding training. Staff update their training annually along with additional refreshers which might take place via email or staff meetings.
- All workers should know what to do if a young person makes a disclosure. 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). Staff should never promise a young person that they will not tell anyone about a report, as this may ultimately not be in the best interests of the young person.

d. Partner Schools

- Partner schools will provide ReachOut workers with relevant information about any young person referred to the programme and will also collaborate with ReachOut DSLs to manage safeguarding cases.

e. Designated Safeguarding Lead

- The Board of Trustees should ensure an appropriate senior member of staff is appointed to the role of Designated Safeguarding Lead (DSL).
- The DSL takes lead responsibility for safeguarding 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.
- In the absence of the DSL, then one of the Deputy DSLs will take on the responsibilities until the DSL is available but the ultimate responsibility for safeguarding lies with the DSL.
- Deputy Designated Safeguarding Leads are trained to the same standard as the DSL.
- 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 every 2 years.
- 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.
- The DSL will review procedures 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.
- The Designated Safeguarding Lead and deputies will liaise with schools, Social Services teams and other professionals as appropriate to ensure co-ordinated approaches and actions.
- The DSL is aware of local criteria for action and the local protocol for assessment as well as the local referral route into children and adult's social care in all operating areas.
- 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 young person or is considered a risk of harm.

## 6. Recognition and Types of Abuse, Neglect and Exploitation

- a. Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. All workers should be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of young people 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 abuse, neglect and exploitation can vary from person to person. Young people develop and mature at different rates, so what appears to be worrying behaviour for someone younger, might be 'normal' for an older young person. Parental behaviours may also indicate abuse, neglect and exploitation, 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 young person and their family. It is important to recognise that a warning sign does not automatically mean a young person is being abused.

- d. All ReachOut workers must be aware of the definitions and signs of abuse, neglect and exploitation. For children and adults at risk, definitions and possible indicators and signs of abuse are outlined in Appendix 1 and 2. Staff and volunteers should also refer to Keeping Children Safe in Education (DfE 2025).
- e. ReachOut workers are also aware of environmental factors which may impact on a young person's welfare and safety and understand safeguarding in the wider context ([contextual safeguarding](#)).
- f. ReachOut workers are aware that welfare concerns may arise in many different contexts:
- Young people may be abused in a family, in an institutional or community setting
  - Young people may be abused by an adult, a group of adults, another young person or a group of young people (child on child abuse).
  - The abuser may be known to the young person or a stranger.
  - Abuse can also take place via the internet and in this case, the abuser can sometimes be an unidentifiable individual.
  - In the case of honour based abuse, including forced marriage and female genital mutilation, young people may be taken out of the country to be abused.
  - An abused young person may often experience more than one type of abuse, as well as other difficulties in their lives.
- g. Abuse, neglect and exploitation 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 young person's health, development and well-being.
- h. Mental health problems can, in some cases, be an indicator that a young person 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 follow the reporting procedure if they are concerned about the wellbeing of a young person. Common signs include:
- becoming withdrawn from friends and family
  - persistent low mood and unhappiness
  - tearfulness and irritability
  - sudden outbursts of anger
  - loss of interest in activities they once enjoyed
  - problems eating or sleeping
- i. Young People with special educational needs and disabilities can face additional safeguarding challenges. Staff will ensure that young people with special education needs and disabilities, specifically those with communication difficulties, are supported to have their voice heard and acted upon. Additional barriers to recognising abuse, neglect and exploitation in this group 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 young person's disability rather than abuse, neglect or exploitation.
  - Speech, language and communication needs which may make it difficult to tell others what is happening.
- j. ReachOut plays a crucial role in preventative education that prepares mentees for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. ReachOut's programme is designed to be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and disabilities and other vulnerabilities). A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff and volunteers endeavour to reduce the

additional barriers faced and create a culture where they can speak out or share their concerns with an adult.

## 7. Online Safety

- a. The online world provides everyone with many opportunities; however it can also present risks and challenges. 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 young people; and
  - Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
- b. Online safety is a running and interrelated theme through ReachOut's approach to safeguarding and we consider how online safety is reflected as required in all relevant policies, our curriculum design, staff and volunteer training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement. The programme provides opportunities to teach safeguarding with mentees being taught how to keep themselves and others safe, including online.
- c. We have a duty to ensure that all young people involved in our organisation are protected from potential harm online by:
- the DSL taking responsibility of online safety coordinator
  - providing training in line with our code of conduct for staff and volunteers on how to behave online
  - supporting and encouraging young people to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
  - reviewing and updating the security of our information systems regularly
  - ensuring that user names, logins, email accounts and passwords are used effectively
  - ensuring personal information about the adults and young people who are involved in our organisation is held securely and shared only as appropriate
  - ensuring that images of young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given
  - providing supervision, support and training for staff and volunteers about online safety
  - risk assessing any social media platforms and new technologies before they are used within the organisation
  - Instructing young people, staff and volunteer mentors personal mobile phones during ReachOut sessions. This is monitored by staff who are issued with work phones and have received guidance on their use.
  - Should sessions require the use of internet connectivity, the school's devices are to be used, that have appropriate filters and monitoring systems in place.
  - including online safety as a key part of the regular training for staff and volunteers
  - ensuring all parties are made aware that any incidents of inappropriate online behaviour or online safety concerns, whether by an adult or young person should be reported through the usual safeguarding procedure outlined in this document.
- d. ReachOut sessions do not regularly take place online but there may be circumstances where a group moves online for a limited period. In this case:
- For ReachOut Online sessions, measures are in place to safeguard young people in these zoom sessions, including waiting rooms, changing the zoom links termly, and limiting access to certain functionality such as screen sharing and private messaging.
  - Additional training is provided to delivery staff on these functions to keep sessions safe
  - All participants are asked to use a neutral background

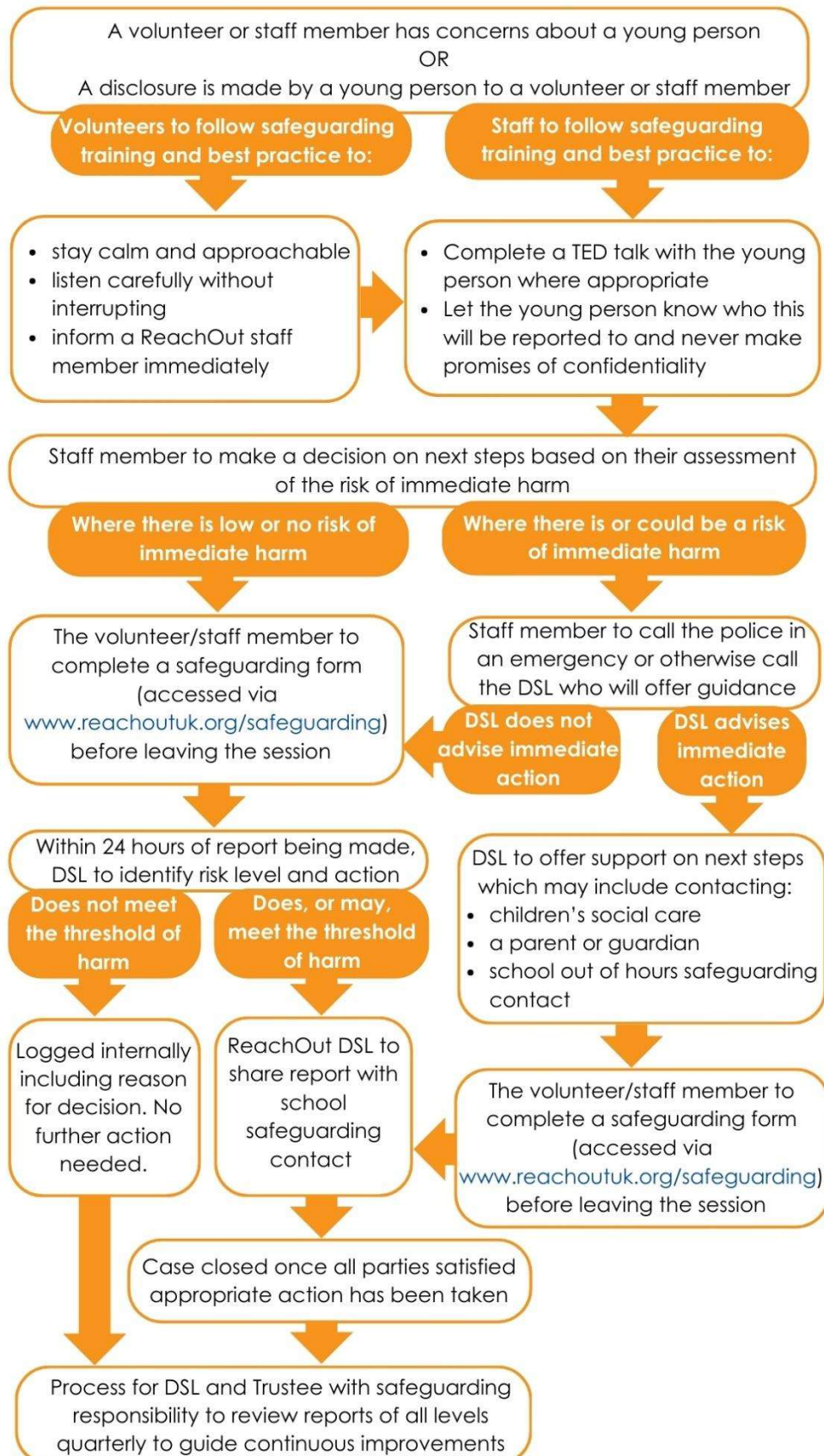
- Mentors and young people are aware of how to get the attention of staff and can contact them to get support in the event of a safeguarding concern

## **8. Adults at Risk**

- a. ReachOut Is committed to the six principles of safeguarding adults at risk which includes: empowerment, protection, prevention, proportionality, partnership and accountability.
- b. Staff understand that whether somebody is an adult is at risk is something which changes with their circumstances – it's not fixed. We have a duty to ensure that all adults at risk involved in our organisation are protected from potential harm.
- c. Staff and volunteers are aware of their role and responsibility to follow the code of conduct and how this extends to working with adults at risk. This is also a key part of regular safeguarding training.
- d. Concerns about an adult at risk should be reported following the reporting procedure (usually used for concerns about Young People). The DSL will ensure that the adult's wellbeing is promoted taking fully into account their views, wishes, feelings and beliefs in deciding on any action as adults at risk have the right to make decisions for themselves.
- e. Where an adult at risk is in/at risk of immediate harm, ReachOut staff must make a referral to adult's social care and if appropriate, the police. Referrals should follow the local referral process.

## 9. Safeguarding Procedure for concerns about Young People

a. The diagram shows the reporting procedure for concerns about young people and the table below that gives examples of different levels of concern.



Level of risk	Examples
<b>Doesn't meet the threshold of harm</b>	<ul style="list-style-type: none"> <li>• Young person aware of content/media inappropriate for their age but following a discussion, there does not seem to be a risk of harm for the young person and they know what to do if they were upset by something they saw</li> <li>• An issue that is resolved eg. a disagreement between young people in the session</li> <li>• Something that is known to the school that they have already shared with us eg. young person says parents are divorcing and conversation brings no further concerns</li> <li>• More information reduces the concern about a comment made eg. a sibling hitting a young person turns out to be a baby with the parent stepping in to help</li> </ul>
<b>Low</b>	<ul style="list-style-type: none"> <li>• Young person exposed to content/media inappropriate for their age that raises concern about their wellbeing or the circumstances in which they were exposed</li> <li>• Vaping, drugs, alcohol</li> <li>• Wellbeing – self-esteem, exam stress, poor sleep</li> <li>• Young person expected to take on adult responsibilities</li> <li>• Deterioration of living conditions</li> <li>• Self-harm has taken place historically with no imminent danger of it taking place</li> <li>• Friendship issues that are impacting wellbeing or indicating bullying</li> </ul>
<b>Medium</b>	<ul style="list-style-type: none"> <li>• Abuse has taken place or there is reasonable cause to believe that it could take place imminently</li> <li>• It is unsafe for a young person to leave the session without supervision eg. they were followed by a stranger on their way there</li> <li>• Concerns around the care-givers mental health with potential for imminent danger</li> <li>• A young person under 13 will be left unsupervised for an extended period</li> </ul>
<b>High</b>	<ul style="list-style-type: none"> <li>• Young person and/or family member are in immediate danger, including posing a risk to themselves.</li> <li>• Self-harm has taken place or there is reasonable cause to believe it will take place</li> <li>• A crime has been committed</li> <li>• An injunction or restraining order is in breach</li> </ul>

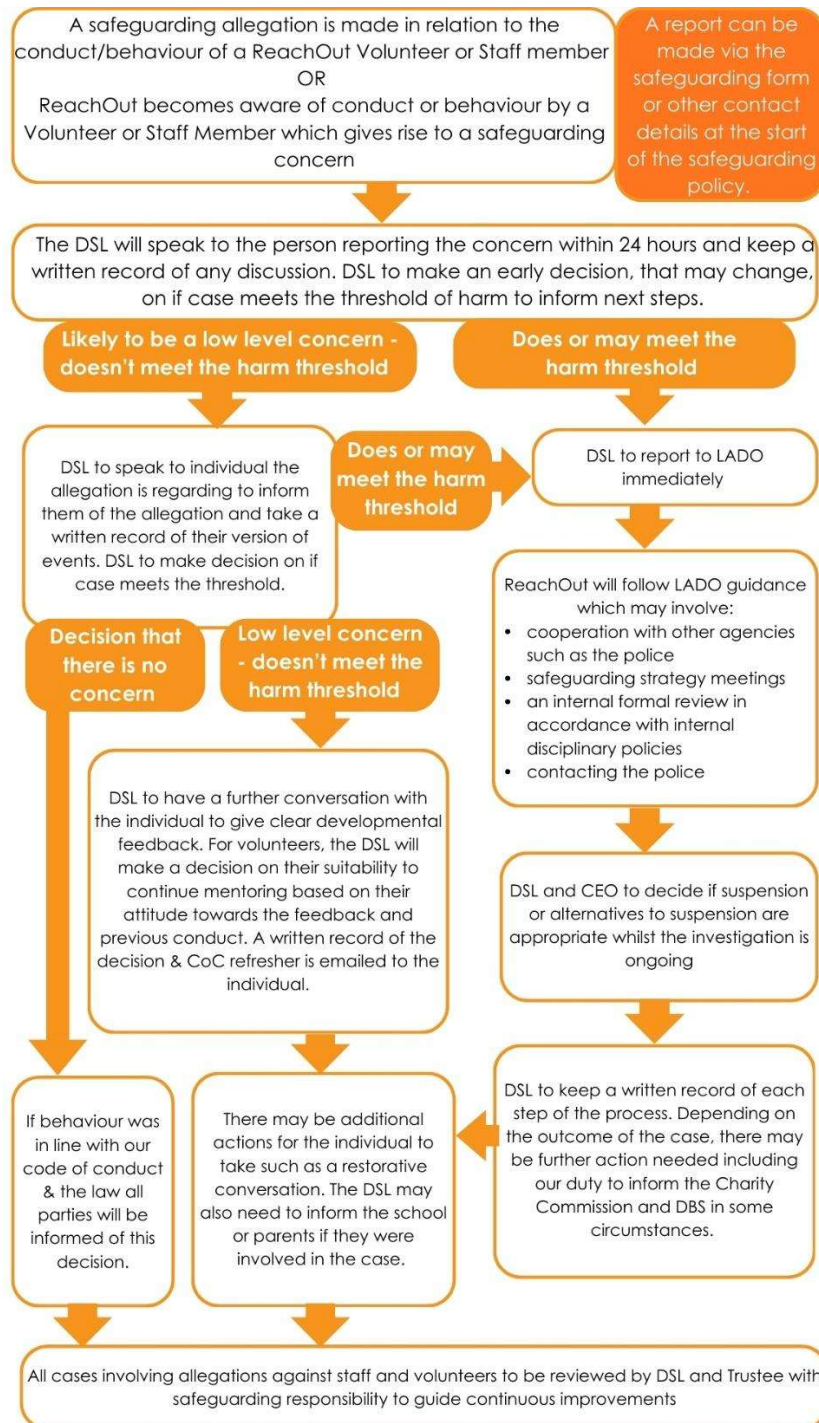
- b. It is the responsibility of the DSL and Deputy DSLs to report to DSLs at partner schools so that they can take appropriate action. School DSLs will then report back on the outcomes of the action taken and any further action to be taken by ReachOut staff.
- c. ReachOut's DSL and deputies should always 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 or adult social care. In these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or deputy) as soon as is practically possible.
- d. Where there is a conflict of interest between a child and an adult, including an adult at risk, the welfare and interests of the child must be paramount.
- e. 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.
- f. In all but the most exceptional circumstances, parent/carers must be made 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 asked to give consent, 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.
- g. Deputy DSLs will be trained in judging the appropriate action to be taken according to the level of risk and are able to seek advice from the DSL. Concerns listed in the table below act as examples, but decisions will always be made depending on the full context of the case.
- h. A concern may be deemed to 'not meet the threshold of harm' by the Deputy DSL.
  - a. This would be where there is an extremely low risk, or potential risk, to a young person.
  - b. This categorisation allows us to take a proportional response and to maintain efficient communications with school partners that prioritise concerns where action is needed.
  - c. It allows us to maintain a cautious culture of staff and volunteers being encouraged to report anything that 'may' constitute a concern whilst allowing the Deputy DSL to make the judgement
  - d. Cases that 'not meet the threshold of harm' are recorded internally, including the reason the decision was made and are reviewed as part of the DSL and Safeguarding Trustee's quarterly review. Previously these cases may not have been logged but they now give us information like

a 'near miss' accident report, allowing us to identify potential training needs with monitoring around DSL decision making.

- e. Whilst not shared as safeguarding reports with the school, the issue may be raised in other communications so that teachers are aware of something that has happened in the session, but we do not require follow up in the way that we'd manage other categorisations of concerns.

## 10. 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 young people and takes seriously any allegation received. The diagram below shows the reporting procedure for allegations against members of staff and volunteers



- b. 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 they must report the matter immediately to the DSL.
- If the DSL is absent, or the allegation is regarding them, reports should be made to the CEO or other senior manager.
  - If neither the CEO, DSL 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.
  - 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
  - The DSL will inform 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.
  - The person to whom the allegation is first made should make a written record of the information using the ReachOut Safeguarding Report Form.
- c. Definition of harm threshold:
- Behaved in a way that has harmed a child or may have harmed a child
  - Possibly committed a criminal offence against or related to a child
  - Behaved towards a child/children in a way that indicates they may pose a risk of harm to children
  - Behaved or may behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside ReachOut that might make an individual unsuitable to work with children, this is known as transferable risk)
- d. Suspension should not be seen as an automatic response to an allegation as a decision to suspend without careful thought could impede a police investigation. Suspension should be considered in every case where:
- There is cause to suspect a young person is at risk of Significant harm;
  - The allegation warrants investigation by the police; or
  - The allegation is so serious that it might be grounds for dismissal.
- e. It may be appropriate to use an alternative to suspension when an allegation is first made. This would allow time for an informed decision regarding suspension to be made and possibly reduce the initial impact of the allegation. This may be achieved by:
- The individual undertaking duties which do not involve direct contact with the young person concerned or other young people e.g. office work;
  - Providing a colleague to be present when the worker has contact with young people
- f. ReachOut will follow guidance agreed at any safeguarding strategy meetings that are called including an internal formal review in accordance with disciplinary policies where:
- A LADO meeting has concluded that disciplinary action should be considered by the employer;
  - The matter has been referred to the employer after the police or Crown Prosecution Service (CPS) has determined that a charge or prosecution may not be appropriate; or
  - Following the conclusion of legal proceedings
- g. If the allegation is substantiated and the person is dismissed, ReachOut should agree with local authority services further action to be taken and by whom.
- 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
  - 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).

- h. Low level concerns (concerns that don't meet the harm threshold)
- 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
  - Some examples of low level concerns are listed below however the context should always be taken into account when deciding if it is in fact a low level concern and any case that may meet the harm threshold should be referred to the LADO for advice.
    - 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
  - 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
- i. Responding to low level concerns
- Low-level concerns should be recorded in writing and passed on to the DSL straight away. On receipt of the concern, the DSL will take the following actions (not necessarily in the order set out):
    - speak to the person who raised the concern, regardless of whether a safeguarding form has been provided
    - speak to any potential witnesses (unless advised not to do so by the LADO or equivalent professional and/or other relevant external agencies, where they have been contacted)
    - speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO or equivalent professional and/or other relevant external agencies, where they have been contacted)
  - The DSL will review the information and determine whether the behaviour:
    - is entirely consistent with the ReachOut code of conduct and the law
    - constitutes a low-level concern
    - is not serious enough to consider a referral to the local authority – but may merit consulting with and seeking advice from them
    - when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO or equivalent local authority professional
    - in and of itself meets the threshold of an allegation and should be referred to the LADO or equivalent local authority professional.
  - If the behaviour is found to be entirely consistent with the ReachOut Code of Conduct and the law, the DSL will:
    - update the individual in question and inform them of the action taken as above
    - speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the ReachOut Code of Conduct and the law
    - consider if the situation may indicate that the Code of Conduct are not clear enough, or if further training is needed
  - If the behaviour is found to constitute a low-level concern, it will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff and

volunteers from any potential false allegations or misunderstandings. Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Other concerns may most appropriately require management guidance and/or training including a refresher about the Code of Conduct and Professional Boundaries. Conversations will include:

- being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, using examples. The approach should be positive and avoid critical, threatening or blaming language or behaviour.
- explaining clearly what change is required in their behaviour
- discussing what, if any, support they might need in order to achieve and maintain the required behaviour
- being clear about the consequences if they fail to be consistent with the Code of Conduct and/or repeat the behaviour in question
- what follow up is required such as informing the school and ongoing and transparent monitoring of the individual's behaviour if appropriate

j. References following allegations

- ReachOut will only share safeguarding concerns/allegations that meet the harm threshold in references. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.
- Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records unless the individual gives their consent for retention of the information.
- For all other allegations, i.e. substantiated, unfounded and unsubstantiated it is important that the information is kept on the file of the person accused including a declaration on whether the information will be referred to in any future reference. Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references.

## **11. Allegations Against Young People (Child on Child Abuse)**

- a. 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.
- b. All ReachOut workers recognise that children are capable of abusing their peers, and that it can happen in school, outside of school and online. 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.
- c. If a Mentee discloses child on child abuse, this should be reported by the adult using the standard reporting procedure above and ReachOut will collaborate with the school partner to conduct a thorough investigation as appropriate. We will seek advice and support from other agencies where needed and the response should treat all children involved as being at potential risk – and be mindful that there may be other victims who have not yet been identified.

## **12. 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 DSL (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.
  - iv. Rationale for those decisions (eg. instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program)
- c. All recordings related to safeguarding issues must be made on the ReachOut Safeguarding 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 young person 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 abuse may lead to a criminal investigation so do not 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 young people with special needs and when the preferred language is not English.
  - Reassure the young person that they are being taken seriously. ReachOut workers should never make the reporter feel ashamed or give the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. The initial response to a report from a young person is extremely important and can encourage or undermine the confidence of future victims to come forward.
  - Where concerns arise as a result of information given by a 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 on our safeguarding system as soon after the incident is reported as possible. All subsequent actions should be added to the safeguarding log on Salesforce.
- g. The Designated Safeguarding Lead will review the safeguarding log monthly to ensure that all incidents are being recorded and dealt with appropriately.
- h. An anonymised sample of the safeguarding log report is reviewed quarterly by the member of the Board of Trustees responsible for safeguarding.

### **13. Information Sharing**

- a. Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting young people's welfare, including their educational outcomes. As part of meeting a young person'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 other organisations, agencies and practitioners as required.
- b. Following the information sharing advice for safeguarding practitioners (2024) 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 young people, whether this is when problems are first emerging, or where a young person is already known to the local authority.
- c. 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.
- d. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping young people 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 young people.
- e. Workers should not assume a colleague or another professional will take action and share information that might be critical in keeping young people safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.
- f. 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 young people.

### **14. Inter-agency Working**

- a. ReachOut recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance, both to ensure young people'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 young person while these take place.
- c. Deputy DSLs 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.
- e. 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.
- f. Any young person may benefit from early help, but all ReachOut staff should be particularly alert to the potential need for early help for a young person 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 young person, 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 young person

## 15. 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.
- 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 detailed in this document.

## 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 the process for safer recruitment is followed:
  - Job description and person specification is approved including the skills and attitudes required for the post and safeguarding requirements
  - Job/role is advertised
  - CV and cover letter or application are submitted
  - Interview or meeting held with prospective employee/volunteer (to ensure suitability to work with children). At least one person on any interview panel has completed Safer Recruitment Training and for delivery roles, interviews to include at least one question related to safeguarding practice.
  - Shortlisted candidates or volunteers who reach this part of the process are given the option to complete a self-declaration. 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 this point in the application process.
  - Check documents to confirm a person's identity and verify the person's right to work in the UK
  - At least two references obtained for successful applicants and these checked by those who have completed safer recruitment training & following internal guidance on acceptable references. Staff will follow up on any partial information or cause for concerns.
  - An enhanced DBS check with children's barred list information will be completed.
  - Regular supervision and performance review procedures for staff and regular feedback & support for volunteers

- c. Disclosure and Barring Service (DBS) checks
- Any positive disclosures from a DBS check will be risk assessed and a decision will be made if an individual is suitable to take up their role. If this is a delivery role, approval will then be sought from the school/s that the candidate is looking to attend.
  - For volunteers, we are able to accept a DBS check that has been completed by another organisation within the last 6 months providing it is enhanced and includes the children's barred list.
  - If the candidate is on the update service they will need to show their certificate, and staff will check their status using the online portal.
  - Through 2025/26 academic year, we are moving towards all volunteers and staff registering on the update service to have a more regular DBS renewal schedule
    - To enable this transition, until June 2026 a volunteer that returns to our programme for a new academic year, can use the same DBS as long as it was issued after Aug 2023.
    - From July 2026, volunteer DBSs will be checked against the update service each academic year and staff will also be asked to join the update service with DBSs being checked annually.
- d. 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.
- e. The Board of Trustees will ensure that all members of the Senior Management Team, and other staff responsible for recruitment and one member of the Board of Trustees complete accredited Safer Recruitment Training.

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

- a. All members of ReachOut staff are provided with a copy of Keeping Children Safe in Education, 2025 which provides an overview of safeguarding duties and responsibilities. ReachOut staff not working directly with children are required to read Part 1 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. ReachOut's DSL ensures that all new staff are appropriately inducted in ReachOut's internal safeguarding procedures and communication lines.
- c. ReachOut's DSL ensures that all new staff complete 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
- d. All staff members 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.
- e. All ReachOut volunteer mentors must complete online safeguarding module as well as live face-to-face safeguarding training during the mentor induction training.
- f. All members of the Board of Trustees will be provided with appropriate safeguarding training which covers their specific strategic responsibilities annually.

## **18. 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. Volunteers will always be 16 or over and where they are under 18, measures are put in place to protect them:
  - Having a Volunteer Officer as a point of contact so that they have somebody trusted to talk to if they have a concern.
  - As part of their volunteer training and through the code of conduct, ensuring that they are clear on the context of their role and that they know and understand their responsibilities and boundaries.
  - Delivery staff understanding additional measures they should put in place for example, making sure the mentor is not left alone with another mentor.
- e. 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 young people.
  - All staff have regular reviews of their own practice to ensure they are providing the highest possible level of support.

## 19. 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 young people 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 avoid any situation where they are on their own with a young person wherever possible
  - Workers should avoid any unnecessary form of physical contact with young people.
  - Physical intervention should only be used when the young person 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. An attendance register of both young people and volunteer mentors must be completed for each session.
- d. During ReachOut sessions there must always be at least one adult (over 18) to eight children as a minimum
  - Sessions will naturally tend to exceed this minimum due to the nature of the programme.
  - If a worker finds themselves close to or below this ratio, they should follow guidance provided by line managers including joining up with another group where possible or informing school site staff.
  - Workers should avoid situations where they are on their own with a young person, out of sight of other adult workers.

- On trips out for young people, a ratio of 1:6 should be maintained and may include school staff as well as ReachOut staff or volunteers.
- e. 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 do this in sight of the group and/or staff member.
  - f. All young people in the care of ReachOut workers must have a consent form (including 2 emergency contacts, health conditions and/or medical requirements) signed by a parent or guardian to participate in all project activities.
  - g. Volunteers should never work unsupervised and should be given clear guidance and support.
  - h. Adult visitors to project sessions or adults present for other programme activities such as trips, (including parents/guardians, funders i.e. those who have not been authorised as staff or volunteers) will be provided with a safeguarding brief and should not have access to young people without the presence of a ReachOut staff member who is overseeing the activity.
  - i. Workers should always treat all young people with respect and dignity, 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. The guidance set out in the respective Staff and Volunteer Code of Conduct documents must be adhered to at all times.
  - j. 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 reported to the DSL.
  - k. 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. Workers should deal with any disagreement about working procedure discreetly, preferably after the session.
  - l. 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.
  - m. If it is discovered a child is missing, the leader of the session should send volunteers in pairs to conduct a search whilst they stay with the main group. The parent or carer should be contacted to establish whether they have returned home and the ReachOut DSL should be contacted if the young person is not found within 10 minutes. Parents or carers are responsible for contacting the police when appropriate. ReachOut staff can contact the police on the parent's/carers' behalf with agreement, or without agreement if the child is at significant risk of harm.

## 20. Key Supporting Documents

- a. Keeping Children Safe in Education (2025)  
[https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping\\_children\\_safe\\_in\\_education\\_from\\_1\\_September\\_2025.pdf](https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf)

- b. Working Together to Safeguard Children (2023)  
[https://assets.publishing.service.gov.uk/media/65803fe31c0c2a000d18cf40/Working\\_together\\_to\\_safeguard\\_children\\_2023\\_-\\_statutory\\_guidance.pdf](https://assets.publishing.service.gov.uk/media/65803fe31c0c2a000d18cf40/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf)
- c. After-school clubs, community activities, and tuition Safeguarding guidance for providers (2023)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1185885/After-school\\_clubs\\_community\\_activities\\_and\\_tuition\\_safeguarding\\_guidance\\_for\\_providers.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1185885/After-school_clubs_community_activities_and_tuition_safeguarding_guidance_for_providers.pdf)
- d. Information sharing advice for safeguarding practitioners (2024)  
[https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info\\_sharing\\_advice\\_content\\_May\\_2024.pdf](https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf)
- e. Contextual Safeguarding  
<https://www.contextualsafeguarding.org.uk/>
- f. Multi-agency statutory guidance on female genital mutilation (Home Office, Department for Education, and Department of Health and Social Care 2020)  
[https://assets.publishing.service.gov.uk/media/613f26d5e90e07044435c949/6.7166\\_HO\\_FBIS\\_BN\\_O\\_Leaflet\\_A4\\_FINAL\\_080321\\_WEB.pdf](https://assets.publishing.service.gov.uk/media/613f26d5e90e07044435c949/6.7166_HO_FBIS_BN_O_Leaflet_A4_FINAL_080321_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)
- j. The prevent duty: for schools and childcare providers (Department for Education June 2015)  
<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>
- k. NSPCC Safeguarding and Child Protection Standards for the Voluntary and Community Sector  
<https://learning.nspcc.org.uk/media/1079/safeguarding-standards-and-guidance.pdf>
- l. Care Act and support statutory guidance (2023)  
<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

## Appendix 1 – Definitions and Indicators of Abuse, Neglect and Exploitation for Children

Definitions of abuse as defined on the NSPCC website. Visit <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/> for further explanations and support with spotting the signs of abuse.

**1. Physical Abuse:** When someone hurts or harms a child or young person on purpose. It includes:

- hitting with hands or objects
- slapping and punching
- kicking
- shaking
- throwing
- poisoning
- burning and scalding
- biting and scratching
- breaking bones
- drowning

Signs that may indicate physical abuse:

- bruises
- broken or fractured bones
- burns or scalds
- bite marks
- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures
- breathing problems from drowning, suffocation or poisoning

**2. Emotional Abuse:** Any type of abuse that involves the continual emotional mistreatment of a child. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child. Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own. Emotional abuse includes:

- humiliating or constantly criticising a child
- threatening, shouting at a child or calling them names
- making the child the subject of jokes, or using sarcasm to hurt a child
- blaming and scapegoating
- making a child perform degrading acts
- not recognising a child's own individuality or trying to control their lives
- pushing a child too hard or not recognising their limitations
- exposing a child to upsetting events or situations, like domestic abuse or drug taking
- failing to promote a child's social development
- not allowing them to have friends
- persistently ignoring them
- being absent
- manipulating a child
- never saying anything kind, expressing positive feelings or congratulating a child on successes
- never showing any emotions in interactions with a child, also known as emotional neglect

Signs that may indicate emotional abuse:

There might not be any obvious physical signs of emotional abuse or neglect. And a child might not tell anyone what's happening until they reach a 'crisis point'. That's why it's important to look out for signs in how a child is acting. As children grow up, their emotions change. This means it can be difficult to tell if they're being emotionally abused. But children who are being emotionally abused might:

- seem unconfident or lack self-assurance
- struggle to control their emotions

- have difficulty making or maintaining relationships
- act in a way that's inappropriate for their age.

**3. Sexual Abuse:** When a child or young person is sexually abused, they're forced, tricked or manipulated into sexual activities. They might not understand that what's happening is abuse or that it's wrong for the abuser to do this to them. They might be afraid to tell someone or behave as though this is normal for them to experience, both are valid for the child to be displaying. Sexual abuse can happen anywhere – and it can happen in person or online including:

- sexual touching of any part of a child's body, whether they're clothed or not
- using a body part or object to rape or penetrate a child
- forcing a child to take part in sexual activities
- making a child undress or touch someone else.
- exposing or flashing
- showing pornography
- exposing a child to sexual acts
- making them masturbate
- forcing a child to make, view or share child abuse images or videos
- making, viewing or distributing child abuse images or videos
- forcing a child to take part in sexual activities or conversations online or through a smartphone.

Signs that may indicate sexual abuse:

- Avoiding being alone with or frightened of people or a person they know.
- Language or sexual behaviour you wouldn't expect them to know.
- Having nightmares or bed-wetting.
- Alcohol or drug misuse
- Self-harm
- Changes in eating habits or developing an eating problem
- Changes in their mood, feeling irritable and angry, or anything out of the ordinary.
- Change in normal behaviour for the child, for example suddenly not attending education or avoiding wanting to go home/running away.
- Bruises.
- Bleeding, discharge, pains or soreness in their genital or anal area.
- Sexually transmitted infections, including in the throat.
- Pain/soreness in throat
- Pregnancy.
- Difficulty in walking/sitting that are not usual for the child.

If a child is being or has been sexually abused online, they might:

- spend a lot more or a lot less time than usual online, texting, gaming or using social media
- seem distant, upset or angry after using the internet or texting
- be secretive about who they're talking to and what they're doing online or on their mobile phone
- behaving as though they have to be online at a certain time, or rushing to get on their phone
- have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet
- Expressing the need for money, this may be used if they are being blackmailed.

**4. Neglect:** The ongoing failure to meet a child's basic needs and the most common form of child abuse. A child might be left hungry or dirty, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger. And it can also have long term effects on their physical and mental wellbeing. Neglect can be a lot of different things, which can make it hard to spot. But broadly speaking, there are 4 types of neglect.

- Physical neglect -A child's basic needs, such as food, clothing or shelter, are not met or they aren't properly supervised or kept safe.
- Educational neglect -A parent doesn't ensure their child is given an education.

- Emotional neglect - A child doesn't get the nurture and stimulation they need. This could be through ignoring, humiliating, intimidating or isolating them.
- Medical neglect - A child isn't given proper health care. This includes dental care and refusing or ignoring medical recommendations.

Signs that may indicate neglect:

- being smelly or dirty
- being hungry or not given money for food
- having unwashed clothes
- having the wrong clothing, such as no warm clothes in winter
- Having health and developmental problems
- living in an unsuitable home environment, such as having no heating
- being left alone for a long time
- taking on the role of carer for other family members
- change in behaviour

**5. Child sexual exploitation (CSE):** a type of sexual abuse. It happens when a child or young person is coerced, manipulated or deceived into sexual activity in exchange for things that they may need or want like gifts, drugs, money, status and affection. Children and young people are often tricked into believing they're in a loving and consensual relationship so the sexual activity may appear consensual. This is called grooming and is a type of abuse. They may trust their abuser and not understand that they're being abused. CSE does not always involve physical contact, and can also occur through the use of technology.

Signs that may indicate CSE:

- Unhealthy or inappropriate sexual behaviour.
- Being frightened of some people, places or situations.
- Being secretive.
- Sharp changes in mood or character.
- A sudden change in their family relationships/dynamics.
- Having money or things they can't or won't explain, such as hotel key cards or unexplained gifts.
- Physical signs of abuse, like bruises or bleeding in their genital or anal area.
- Sudden change in physical appearance including clothes and hygiene levels.
- Alcohol or drug misuse.
- Sexually transmitted infections.
- A sudden and urgent request to go onto contraception or to obtain the 'morning after pill'.
- Pregnancy

Other things you might notice:

- Having an older person they view as their boyfriend or girlfriend
- Staying out late or overnight
- Having a new group of friends
- Missing from home or care, or stopping going to school or college
- Hanging out with older people, other vulnerable people or in antisocial groups
- Involved in a gang
- Involved in criminal activities like selling drugs or shoplifting

**6. Female Genital Mutilation (FGM):** is when a female's genitals are deliberately altered or removed for non-medical reasons. It's also known as 'female circumcision' or 'cutting' but has many other names.

Signs FGM might happen:

- A relative or someone known as a 'cutter' visiting from abroad.
- A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'.
- A female relative, like a mother, sister or aunt has undergone FGM.
- A family arranges a long holiday overseas or visits a family abroad during the summer holidays.

- A girl has an unexpected or long absence from school.
- A girl struggles to keep up in school.
- A girl runs away – or plans to run away - from home.

Signs FGM might have taken place:

- Having difficulty walking, standing or sitting.
- Spending longer in the bathroom or toilet.
- Appearing quiet, anxious or depressed.
- Acting differently after an absence from school or college.
- Reluctance to go to the doctors or have routine medical examinations.
- Asking for help – though they might not be explicit about the problem because they're scared or embarrassed.

Any information or concern that a child is at immediate risk of or has undergone FGM should be reported by calling 101 as soon as possible, by the very latest the end of the next working day following the guidance set out in [Mandatory Reporting of Female Genital Mutilation – procedural information](#) (Home Office and DfE 2022).

**7. 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. Cyberbullying is bullying that takes place online. Unlike bullying offline, online bullying can follow the child wherever they go, via social networks, gaming and mobile phone.

Signs of bullying or cyber bullying:

- belongings getting 'lost' or damaged
- physical injuries, such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- a change in how they are doing at school, including a dip in grades or not handing homework in
- asking for, or stealing, money (to give to whoever's bullying them)
- a change in behaviour, including being nervous, losing confidence, or becoming distressed and withdrawn
- a change in eating or sleeping habits
- bullying others

**8. Criminal exploitation (including county lines and gangs):** Criminal exploitation is child abuse where children and young people are manipulated and coerced into committing crimes. It's not illegal for a young person to be in a gang – there are different types of 'gang' and not every 'gang' is criminal or dangerous. However, gang membership can be linked to illegal activity, particularly organised criminal gangs involved in trafficking, drug dealing and violent crime.

County Lines is the police term for urban gangs exploiting young people into moving drugs from a hub, normally a large city, into other markets - suburban areas and market and coastal towns - using dedicated mobile phone lines or "deal lines". Children as young as 12 years old have been exploited into carrying drugs for gangs. This can involve children being trafficked away from their home area, staying in accommodation and selling and manufacturing drugs. This can include Airbnb and short term private rental properties, budget hotels or the home of a drug user, or other vulnerable person, that is taken over by a criminal gang- this may be referred to as cuckooing.

Signs of criminal exploitation

- Frequently absent from and doing badly in school.
- Going missing from home, staying out late and travelling for unexplained reasons.
- In a relationship or hanging out with someone older than them.
- Being angry, aggressive or violent.
- Being isolated or withdrawn.

- Having unexplained money and buying new things.
- Wearing clothes or accessories in gang colours or getting tattoos.
- Using new slang words.
- Spending more time on social media and being secretive about time online.
- Making more calls or sending more texts, possibly on a new phone or phones.
- Self-harming and feeling emotionally unwell.
- Taking drugs and abusing alcohol.
- Committing petty crimes like shop lifting or vandalism.
- Unexplained injuries and refusing to seek medical help.
- Carrying weapons or having a dangerous breed of dog.

**9. Domestic abuse:** any type of controlling, bullying, threatening or violent behaviour between people who are or have been in a relationship. It can also happen between adults related to one another. It can seriously harm children and young people, and experiencing domestic abuse is child abuse. Domestic abuse can be emotional, physical, sexual, economic, coercive or psychological, such as:

- kicking, hitting, punching, cutting or throwing objects
- rape (including in a relationship)
- controlling someone's finances by withholding money or stopping someone earning
- controlling behaviour, like telling someone where they can go and what they can wear
- not letting someone leave the house
- reading emails, text messages or letters
- threatening to kill someone or harm them
- threatening to another family member or pet.

Signs that a child has experienced domestic abuse can include:

- aggression or bullying
- anti-social behaviour, like vandalism
- anxiety, depression or suicidal thoughts
- attention seeking
- bed-wetting, nightmares or insomnia
- constant or regular sickness, like colds, headaches and mouth ulcers
- drug or alcohol use
- eating disorders
- problems in school or trouble learning
- tantrums
- withdrawal

**10. Child trafficking:** where children and young people tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold. Children are trafficked for:

- sexual exploitation
- benefit fraud
- forced marriage
- domestic slavery like cleaning, cooking and childcare
- forced labour in factories or agriculture
- committing crimes, like begging, theft, working on cannabis farms or moving drugs

Signs of child trafficking

- spend a lot of time doing household chores
- rarely leave their house or have no time for playing
- be orphaned or living apart from their family
- live in low-standard accommodation
- be unsure which country, city or town they're in
- can't or are reluctant to share personal information or where they live
- not be registered with a school or a GP practice

- have no access to their parents or guardians
- be seen in inappropriate places like brothels or factories
- have money or things you wouldn't expect them to
- have injuries from workplace accidents
- give a prepared story which is very similar to stories given by other children.

**11. Grooming:** when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked. Anybody can be a groomer, no matter their age, gender or race. Grooming can take place over a short or long period of time – from weeks to years. Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative.

Signs of grooming:

- being very secretive about how they're spending their time, including when online
- having an older boyfriend or girlfriend
- having money or new things like clothes and mobile phones that they can't or won't explain
- underage drinking or drug taking
- spending more or less time online or on their devices
- being upset, withdrawn or distressed
- sexualised behaviour, language or an understanding of sex that's not appropriate for their age
- spending more time away from home or going missing for periods of time

**12. Online abuse:** any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones. Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming. Or the abuse might only happen online. Online abuse can include:

- cyberbullying
- emotional abuse
- grooming
- sexting
- sexual abuse
- sexual exploitation

Signs of online abuse:

- spend a lot more or a lot less time than usual online, texting, gaming or using social media
- seem distant, upset or angry after using the internet or texting
- be secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.

## Appendix 2 – Definitions and Indicators of extremism or radicalisation

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

[The government provides guidance for behaviour that could constitute extremism](#) and the [DfE's guidance on managing risk of radicalisation](#) should be referred to for further indicators. Any concerns around radicalisation or extremism should be reported using the standard reporting procedure. The DSL will take appropriate action which may include a Prevent Referral, in most cases with the consent of parents and carers.

The process of radicalisation may involve:

- being groomed online or in person
- exploitation, including sexual exploitation
- psychological manipulation
- exposure to violent material and other inappropriate information
- the risk of physical harm or death through extremist acts.

Anyone can be radicalised but there are some factors which may make a young person more vulnerable including:

- being easily influenced or impressionable
- having low self-esteem or being isolated
- feeling that rejection, discrimination or injustice is taking place in society
- experiencing community tension amongst different groups
- being disrespectful or angry towards family and peers
- having a strong need for acceptance or belonging
- experiencing grief such as loss of a loved one.

If a child or young person is being radicalised their day-to-day behaviour may become increasingly centred around an extremist ideology, group or cause. For example, they may:

- spend increasing amounts of time talking to people with extreme views (this includes online and offline communication)
- change their style of dress or personal appearance
- lose interest in friends and activities that are not associated with the extremist ideology, group or cause
- have material or symbols associated with an extreme cause
- try to recruit others to join the cause

## Appendix 3 – Types of harm that may be experienced by Adults at Risk

As defined on the Ann Craft website. Visit <https://www.anncrafttrust.org/resources/types-of-harm> for further explanations and support with spotting the signs of abuse.

### Categories of Abuse in the Care Act

- a. **Self-neglect** - This covers a wide range of behaviour, but it can be broadly defined as neglecting to care for one's personal hygiene, health, or surroundings. An example of self-neglect is behaviour such as hoarding.
- b. **Modern Slavery** - This encompasses slavery, human trafficking, forced labour, and domestic servitude.
- c. **Domestic Abuse** - This includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person's family. It also includes so-called "honour" based violence.
- d. **Discriminatory** - Discrimination is abuse that centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act.
- e. **Organisational** - This includes neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, or in relation to care provided in one's own home. Organisational abuse can range from one off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- f. **Physical** - This includes hitting, slapping, pushing, kicking, restraint, and misuse of medication. It can also include inappropriate sanctions.
- g. **Sexual** - This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented, or was pressured into consenting.
- h. **Financial or Material** - This includes theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions. It can also include the misuse or misappropriation of property, possessions, or benefits.
- i. **Neglect and Acts of Omission** - This includes ignoring medical or physical care needs and failing to provide access to appropriate health social care or educational services. It also includes the withdrawing of the necessities of life, including medication, adequate nutrition, and heating.
- j. **Emotional or Psychological** - This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.

### Additional Types of Harm

- a. **Cyber Bullying** - Cyber bullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages. It can also involve using online forums with the intention of harming, damaging, humiliating, or isolating another person. It includes various different types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities. The main difference is that, instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.
- b. **Forced Marriage** - This is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-Social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.
- c. **Mate Crime** - A "mate crime" is when "vulnerable people are befriended by members of the community who go on to exploit and take advantage of them" (Safety Network Project, ARC). It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the adult knows, and it often happens in private. In recent years there have been a number of Serious Care Reviews relating to people with a learning disability who were seriously harmed, or even murdered, by people who purported to be their friend.

- d. Radicalisation - The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause. This may be direct through a relationship, or through social media.
- e. Non-recent child abuse, sometimes called historical abuse, is when an adult was abused as a child or young person under the age of 18.