

ESP Foundation – Safeguarding and Child Protection Policy

SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN IS EVERYONE’S RESPONSIBILITY

Policy owner	ESP Foundation Trustee Board / Designated Safeguarding Lead
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Policy Statement

ESP Foundation is committed to safeguarding and promoting the welfare of children and young people. Safeguarding and promoting the welfare of children is everyone’s responsibility. All staff, volunteers, trustees and visitors must ensure their approach is child-centred, keeping the child’s best interests at the heart of all actions and decisions.

This policy is designed to:

- Raise awareness with all ESP Foundation staff, trustees, volunteers and regular visitors of the need to safeguard all children and of their responsibilities in identifying and reporting possible cases of abuse without delay.
- Emphasise the need for good communication between all members of staff, volunteers, trustees and partner organisations in matters relating to child protection.
- Develop a structured procedure that will be followed by all members of the ESP Foundation community in cases of suspected abuse.
- Provide a systematic means of monitoring young people known or thought to be at risk of significant harm or where there are ongoing concerns.
- Work openly and in partnership with parents in relation to child protection or safeguarding concerns.

- Support all young people's development in ways that will foster security, confidence and independence.
- Promote safe practice and challenge poor and unsafe practice.
- Further develop and promote effective working relationships with other agencies involved with safeguarding and promoting the welfare of children.
- Ensure that all adults working within ESP Foundation programmes have been checked as to their suitability to work with children, in line with safer recruitment guidance, including appropriate identity checks, references, role risk assessment, DBS checks where required, and induction before unsupervised contact with children.
- Integrate opportunities into the curriculum for children to develop the skills they need to recognise and stay safe from abuse, allowing for continuity and progression through the key stages; and
- Take account of and inform policy in related areas, such as anti-bullying, online safety, discipline and behaviour, health and safety, child-on-child abuse, missing children, child sexual exploitation, FGM, violence in the name of honour, anti-radicalisation, positive handling and physical intervention, procedures for dealing with allegations against staff, and safer recruitment practice.

ESP Foundation will endeavour to safeguard children and adults by:

- Adopting child protection guidelines through procedures and a code of conduct for staff and volunteers
- Sharing information about child protection and good practice with children, parents and carers, staff and volunteers
- Sharing information about concerns with agencies that need to know, and involving parents and children appropriately.
- Carefully following procedures for the recruitment and selection of staff and volunteers.
- Providing effective management for staff and volunteers through regular supervision, support and safeguarding training.
- Reviewing this policy and good practice at regular intervals, and at least once every 12 months.

WHAT STAFF SHOULD LOOK OUT FOR

It is important that all staff are aware of the signs of abuse and neglect, child sexual exploitation, FGM, honour-based abuse, forced marriage and radicalisation so that they can identify children who may need help or protection.

We recognise that knowing what to look for helps staff identify concerns early. Staff members working with children should maintain an attitude of “it could happen here” where safeguarding is concerned. When concerned about the welfare of a child, staff members must always act in the interests of the child.

Signs or indicators of children at risk include, but are not limited to, a child who:

- is disabled and/or has specific or 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 into antisocial 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.

Local Safeguarding Children's Boards have been replaced by Multi-Agency Safeguarding Partnerships. These local safeguarding arrangements are led by the three statutory safeguarding partners: the local authority, the chief officer of police and the relevant health body, in line with the Children and Social Work Act 2017 and Working Together to Safeguard Children. Staff should follow the relevant local safeguarding partnership procedures and seek advice from the Designated Safeguarding Lead where there is any uncertainty.

CONFIDENTIALITY

We recognise that matters related to Child Protection are of a confidential nature. The DSL will therefore share detailed information about a participant with other staff members on a need-to-know basis only. All staff must be aware that they have a professional responsibility to share information with the designated leader and with other relevant agencies where necessary to safeguard and promote the welfare of children. All staff must be aware that they cannot promise a child that they will keep certain information secret.

LOOKED AFTER CHILDREN, CARE LEAVERS and OTHER CHILDREN LIVING AWAY FROM HOME

ESP Foundation will:

Ensure there is a designated staff member whose role is to promote the welfare and achievement of children who are looked after, previously looked after, care leavers and other children living away from home, and that the identified person has received appropriate training in line with current statutory guidance and the Children and Families Act 2014 where applicable.

Ensure that appropriate staff have the information they need in relation to a child's looked-after legal status, including whether they are looked after under voluntary arrangements with parental consent or under an interim or full care order. Staff should also have relevant information about contact arrangements with birth parents or others with parental responsibility, the child's care arrangements, the level of authority delegated to the carer by the local authority, and the details of the child's social worker and virtual school head.

Inform the local authority if ESP Foundation believes a child is being privately fostered. Recognise that children who were previously looked after, care leavers and other children living away from home may also be additionally vulnerable and may continue to require higher levels of support.

CHILDREN WITH SPECIAL EDUCATIONAL NEEDS / DISABILITIES

We recognise that children with SEN / Disabilities may be especially vulnerable to abuse and expect staff to take extra care to interpret apparent signs of abuse or neglect.

We will not assume that indicators of abuse, such as behaviour, mood or injury, relate to the child's disability without further exploration.

We will provide an environment in which all children, including those with SEND, can feel confident and able to discuss their concerns. We will provide support with communication difficulties where needed and make appropriate adjustments.

We recognise that children with SEN and disabilities are at higher risk of peer group isolation and may experience a disproportionate impact from bullying. We will provide proactive support to reduce these risks.

CONTEXTUAL SAFEGUARDING

Safeguarding incidents or behaviours can be associated with factors outside ESP Foundation delivery and can occur between children outside ESP Foundation activities.

All staff, especially the Designated Safeguarding Lead or Deputy DSL, should consider the context in which such incidents 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.

Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process.

This allows any assessment to consider all available evidence and the full context of the child's circumstances.

Legal and Statutory Framework

This policy and all related procedures are based on and informed by current legislation and statutory guidance, including:

- The Children Act 1989 and 2004
- The Children and Social Work Act 2017
- The Children and Families Act 2014
- Working Together to Safeguard Children, current statutory guidance
- Keeping Children Safe in Education, current statutory guidance where applicable
- The Equality Act 2010
- The Human Rights Act 1998
- The United Nations Convention on the Rights of the Child (UNCRC)
- London Child Protection Procedures and relevant local Multi-Agency Safeguarding Partnership procedures

ALLEGATIONS AGAINST STAFF

We recognise that there will be occasions when a young person, or a parent or another person may make an allegation against a member of staff. The term "allegations" refers to concerns reported or raised that might indicate a person has caused harm to a child, acted in a way that created potential serious risk to a child or would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity.

This means it has been alleged that a member of staff (including volunteers) has behaved in a way that has, or may have, harmed a child.

This includes allegations that a member of staff, volunteer, contractor or trustee has possibly committed a criminal offence against or related to a child, behaved towards a child or children in a way that indicates they may pose a risk of harm, or behaved in a way that indicates they may be unsuitable to work with children. The Designated Safeguarding Lead must be informed immediately. The DSL must contact the Local Authority Designated Officer (LADO) and follow the relevant local procedures for

managing allegations against adults who work or volunteer with children. Staff must not investigate allegations themselves or discuss the matter more widely than necessary.

If the allegation is against the Designated Safeguarding Lead or the CEO then the Chair of the Board of Trustees must be informed.

The LADO process must be followed where an allegation may meet the threshold for harm, risk of harm, criminal conduct, or suitability concerns. Records must be factual, dated, signed and stored securely. Where there is an immediate risk to a child, emergency services must be contacted without delay.

TRUSTEE BOARD INVOLVEMENT IN SAFEGUARDING

In line with Charity Commission guidance, the Trustee Board has the following responsibilities for ensuring effective safeguarding at ESP Foundation:

- Ensuring the charity has an adequate policy, code of conduct and procedures.
- Reviewing the policy annually and updating policy and procedures so they remain fit for purpose.
- Regularly evaluating safeguarding training to confirm that it is current and relevant.
- Identifying significant safeguarding risks and working to mitigate them as part of the Board's wider responsibilities for risk management.
- Reviewing any serious incidents or near misses so that the organisation learns from safeguarding concerns and shares learning appropriately.
- Making sure all staff, volunteers, participants and wider stakeholders know how to raise a safeguarding concern. The executive team must inform the Trustee Board of any serious incidents or allegations made against staff or the executive team that require an internal investigation.

PEER TO PEER ABUSE

We recognise that children can abuse their peers. As an organisation, we work to minimise the risk of child-on-child abuse and will investigate and respond to any allegations promptly and appropriately. Where needed, risk assessments will be completed and strategies put in place to protect and support the child who has experienced abuse. Concerns will be treated seriously and followed up in a timely and sensitive way.

It is important to be aware that any child who engages in abusive behaviour towards others may also have experienced abuse from other children or adults. Abusive

behaviour can take a variety of forms, including sexual abuse or activity, physical harm, emotional abuse or verbal abuse.

Children who abuse others should be held responsible for their behaviour, while also being responded to in a way that meets their needs and protects others.

In such incidents, ESP Foundation will follow relevant guidance and local procedures, and will make referrals to children's social care, CAMHS and/or the police as appropriate.

Instances of sexual violence and sexual harassment will be taken seriously and responded to promptly. ESP Foundation will consider relevant statutory guidance, including Part 5 of Keeping Children Safe in Education where applicable.

ON THE GROUND STRATEGY - OVERVIEW

- a. ESP Foundation works in partnership with organisations and therefore follows their established referral routes for allegations regarding their participants.
- b. Generally, where a practitioner suspects that a child is being abused, they should disclose this to both the partner organisation's Designated Safeguarding Lead and ESP Foundation's Designated Safeguarding Lead.
- c. Where the partner organisation cannot be contacted and ESP Foundation knows or suspects that a child or vulnerable adult is suffering, or is at risk of suffering, significant harm, ESP Foundation has a duty to refer the concern to a statutory agency, such as children's social care, the NSPCC or the police.
- d. In cases where a worker or volunteer suspects a child is being abused, they should inform ESP Foundation's Designated Safeguarding Lead, who will inform the statutory agency accordingly.
- e. All staff and volunteers are to be aware of the signs of abuse and what to do if concerns arise.
- f. All concerns must be recorded on the confidential incident form on the same day the concern is identified, as soon as reasonably possible. The form must be stored securely in the agreed safeguarding records location. If in doubt, staff and volunteers must seek advice from the DSL.

Related safeguarding forms, incident records, lone working guidance, missing child procedure, media consent forms and safer recruitment records are held in ESP Foundation's agreed safeguarding policy folder and must be explained to staff and volunteers during induction.

- g. Confidentiality is of the utmost importance and incidents should only be discussed with the relevant persons e.g. the ESP Foundation Project Manager or Social Services. See Data Protection Policy.

- h. To comply with London Child Protection Procedures and safer recruitment guidance, every programme worker who has regulated activity or substantial access to children must undergo an appropriate Disclosure and Barring Service (DBS) check.
- i. One of the main philosophies of the Children Act 1989 is that local authorities should work in 'partnership' with parents wherever possible. Social Services guidelines stress: All referrals are taken seriously and are considered with an open mind. Once the local authority has been informed it has a duty to investigate. Any enquiry should be conducted in such a way that the parents are not unnecessarily antagonised. Parents are entitled to know what is going on and to be helped to understand the steps that are being taken.

ON THE GROUND STRATEGY - GUIDELINES

- a. Make ESP Foundation's position on child protection clear and visible. Display information so that staff, volunteers, children, parents and carers understand that safeguarding is taken seriously.
- b. Operate an "open door" environment. Keep parents and children informed about what the youth workers/volunteers are doing. Advise parents that volunteers will go through a screening process.
- c. Establish procedures through which all complaints or concerns can be raised and handled confidentially.
- d. Keep a record of any medical conditions that may affect a child and any medication they require. As part of the course registration process, ESP Foundation obtains permission from parents or carers to administer first aid treatment in the event of an accident.
- e. Keep an accident book and record all injuries, however minor, with details of any treatment given. Record how and where the accident happened, including dates, times, action taken and details of any witnesses. This information may be relied upon in the event of an insurance claim.
- f. Make sure two adults arrive for a session ahead of time so that children are not left alone. Staff and volunteers must not leave until the last child has been collected.
- g. Monitor staff training needs, keep a training record, and make sure all staff, youth workers and volunteers complete mandatory safeguarding training during induction or onboarding. Safeguarding training must be refreshed at least annually, or sooner where legislation, guidance, local procedures or role responsibilities change. Technical skills and child protection training should also be reviewed through supervision and annual appraisal.
- h. When recruiting new staff, whether volunteers or paid staff, make sure the correct procedures are followed in the advertising and selection process.
- i. Make sure all adults with substantial access to children and vulnerable adults agree to undergo enhanced DBS checking where required.

- j. Make sure all adults with substantial access to children and vulnerable adults attend child protection awareness training.
- k. Where a volunteer or staff member does not have a DBS check, the DSL must complete a risk assessment to determine whether an enhanced DBS check is required.
- l. Lone working must be avoided wherever possible. Where it cannot be avoided, a written risk assessment must be completed in advance, approved by the DSL or senior lead, and include clear arrangements for supervision, contact, emergency escalation and recording. Staff must follow ESP Foundation's lone working guidance and must not place themselves or a child in an avoidable one-to-one isolated situation.
- m. If a child is missing during, before or after a session, staff must follow the missing child procedure immediately. This includes checking the immediate area, alerting the session lead and DSL, contacting parents or carers, recording the time and circumstances, and contacting the police on 999 where there is an immediate risk or the child cannot be located quickly.
- n. First aid must be administered only by trained staff where possible. An ambulance must be called immediately if a child has a serious injury, breathing difficulty, loss of consciousness, suspected fracture, seizure, severe allergic reaction, head injury with concerning symptoms, or any condition requiring urgent medical attention. Parents or carers must be informed as soon as practicable after emergency action has been taken. All accidents, treatment, decisions, witness details and parent or carer notifications must be recorded.

MEDIA GUIDELINE FOR ALL STAFF AND VISITORS

Photographs, video or audio recordings of children and young people must only be taken on authorised ESP Foundation devices, and only where there is a clear work-related purpose and appropriate consent. Staff, volunteers and visitors must not use personal phones, personal cameras or personal devices to take images or recordings of children or young people. Images must be stored only on approved ESP Foundation systems, shared only where consent and safeguarding requirements allow, and deleted from the capture device once transferred securely. Visitors must not take images or recordings during sessions unless this has been agreed in advance by ESP Foundation and is covered by consent and safeguarding arrangements. Content must not be shared on websites, social media or printed materials without written authorisation from the ESP Foundation CEO or Trustee Board and appropriate consent from the child's parent or carer, and, where suitable, the child or young person.

CODE OF CONDUCT

Staff and volunteers should:

- a. Treat all children and vulnerable adults with respect
- b. Provide an example of good conduct you wish others to follow.
- c. Ensure that whenever possible there is more than one adult present during activities with children and vulnerable adults, or at least that you are within others' sight or hearing.
- d. Respect a child's right to personal privacy and encourage children and adults to feel comfortable enough to challenge attitudes or behaviours they do not like.
- e. Remember that someone else might misinterpret your actions, no matter how well intentioned.
- f. Be aware that even physical contact with a child or vulnerable adults may be misinterpreted.
- g. Adopt extra caution when discussing sensitive issues with children or vulnerable adults.
- h. Operate within ESP Foundation's Safeguarding Policy.
- i. Challenge unacceptable behaviour and report allegations and suspicions of abuse.

Staff and volunteers should never:

- a. Strike a child.
- b. Use profane, insulting, harassing or otherwise offensive language.
- c. Engage in rough, physical or sexually provocative games, including horseplay.
- d. Spend an excessive amount of time alone with a child or vulnerable adult, away from others. Meetings with individual children or young people should take place as openly as possible. If privacy is needed, the door should be left ajar and other staff and volunteers should be informed of the meeting.
- e. Take children alone on car journeys, no matter how short, without first consulting the parents or carers. Where such a journey is necessary, two adults should travel in the car.
- f. Take children to your home where they will be alone with you.
- g. Have direct 1 to 1 contact via social media or text message with a young person. If this does happen, the Designated Safeguarding Lead should be informed of this exchange at the earliest possible opportunity.
- h. Share a bedroom with a child or vulnerable adult.
- i. Meet children outside organised activities. If this is unavoidable, inform a senior member of the team and always be contactable by phone.
- j. Do things of a personal nature for children or vulnerable adults that they can do for themselves.
- k. Intrude into the private life of a child.
- l. Allow or engage in any unnecessary physical contact with a child (physical contact should only take place with the consent of the child and the purpose of the contact should be clear)
- m. Make sexually suggestive comments in front of, about, or to, a child, even in fun.

- n. Allow a child to use inappropriate language unchallenged, and in particular racist or homophobic language.
- o. Reduce a child to tears as a form of control.
- p. Allow allegations of abuse or poor practice to go unreported or unrecorded.
- q. Jump to conclusions about others without checking facts.
- r. Rely on their good name to protect them.
- s. Enter into, encourage, facilitate or allow any sexual, intimate or inappropriate relationship with a young person aged 16 to 18, or with any child, young person or service user where the member of staff or volunteer holds a position of trust or responsibility.
- t. Staff and volunteers must understand that in England and Wales, it may be a criminal offence for an adult in a position of trust to engage in sexual activity with a young person under 18 where that position of trust exists. Breaches may lead to safeguarding investigations, referral to the LADO, police involvement, suspension, dismissal, referral to the Disclosure and Barring Service, barring from working with children, and referral to any relevant professional regulator or governing body.

SIGNS OF ABUSE

This policy recognises four broad categories of abuse, as set out in NSPCC guidance.

For further detail on definitions and indicators of abuse, staff should refer to Appendix 1. Children may also be exposed to or harmed through domestic abuse, online abuse, sharing of sexual images, child sexual exploitation, child criminal exploitation, trafficking, female genital mutilation, non-recent abuse, radicalisation or Prevent-related concerns, and other forms of harm outside the home. Child trafficking is an offence and may be prosecuted even where exploitation or abuse has not yet occurred. Staff must report any concern immediately to the DSL, even where they are unsure which category applies.

Physical Abuse: This may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child who they are looking after.

Emotional Abuse: This is the persistent emotional ill-treatment of a child, which can cause severe and long-lasting effects on the child's emotional development. It may involve conveying to children that they are worthless, unloved, inadequate, or valued only in so far as they meet the needs of another person. It can also involve inappropriate expectations being imposed on children, or causing children frequently to feel frightened or in danger. Some level of emotional abuse is involved in many types of ill-treatment of a child, though it may occur alone.

Neglect: This is the persistent failure to meet the child's basic physical and/or psychological needs, likely to result in serious impairment of the child's physical or cognitive development. This may include inadequate care and supervision, which leaves a child in a dangerous situation where harm could occur and where this could have been avoided.

Sexual Abuse: This involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening or gives consent. The activities may involve physical contact, including penetrative acts such as rape, or non-penetrative acts. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images or material, watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Other types of abuse, such as commercial sexual exploitation and trafficking, are complex manifestations of a combination of the four categories above. Bullying may also be a form of abuse where it is intended to hurt another person physically, emotionally or sexually.

Abuse can take place in many settings, including within the family, community or online. Abuse can also occur through digital technology, including smartphones, messaging platforms, social media and gaming platforms. Staff should remember that adults can abuse children and children can also harm other children.

Signs of abuse

The signs of abuse in this policy are informed by NSPCC guidance. This policy includes general signs of abuse. Volunteers and staff must also receive more detailed safeguarding training and information on age-specific and category-specific indicators of abuse. Abused children may be afraid to tell anybody about the abuse. They may experience guilt, shame or confusion, particularly if the abuser is a parent, caregiver, close family member or friend. Anyone working with children or young people must remain alert to the signs listed below.

While these signs do not necessarily mean that a child is being abused, they may indicate that the child or family needs support or that further enquiries are required.

- a. Regularly experiencing nightmares or sleeping problems.
- b. Changes in personality.
- c. Outbursts of anger.
- d. Changes in eating habits.
- e. Showing inexplicable fear of particular places or making excuses to avoid particular people.
- f. Self-harming (includes head banging, scratching, cutting).
- g. Not receiving adequate medical attention after injuries.
- h. Showing violence to animals, toys, peers or adults.

- i. Knowledge of adult issues, such as alcohol, drugs or sexual behaviour.
- j. Lacking confidence or often wary/anxious.
- k. Regressing to the behaviour of younger children.
- l. Regular flinching in response to sudden but harmless actions, e.g., someone raising a hand quickly.

Whether a child's behaviour or appearance is concerning depends on their age and stage of development. Staff should consider signs of potential abuse in the context of the child's circumstances. Children with learning difficulties, physical disabilities or health-related needs may be at a different developmental stage from their peers. Children who have experienced abuse or neglect from an early age may also display developmental delays. Where there is no clear medical or developmental explanation, this may indicate abuse or neglect.

RECRUITMENT AND VETTING OF STAFF AND VOLUNTEERS

ESP Foundation follows safer recruitment practice for the recruitment of all staff and volunteers. Recruitment must be planned, documented and proportionate to the role, and must follow current statutory and good practice guidance, including safeguarding checks, identity verification, references, interview assessment, DBS checks where required, and induction before any unsupervised contact with children. Recruitment and vetting of staff and volunteers checklist:

1. Wide publicity for vacancies
2. Written application form
3. Shortlisting of applicants against a written job description identifying the roles and responsibilities of the post
4. Approach two referees with specific questions about the applicant's suitability to work with children. References should be in writing and on headed paper. A follow-up phone call should be made to verify that they are genuine.
5. Obtain a written declaration from the applicant confirming that there is no reason why they would be considered unsuitable to work with children.
6. Interview, including a question about whether the applicant has any criminal convictions, cautions, legal restrictions or pending cases that may affect their suitability to work with children. Applicants must be asked to bring photographic ID.
7. Identification check, using appropriate documents such as a full birth certificate, photocard driving licence or passport, and completion of an enhanced DBS check where required for the role.
8. All safer recruitment decisions must be recorded. Any concerns arising from application forms, interviews, references, identity checks, DBS information or gaps in employment must be risk assessed and escalated to the DSL or senior lead before an appointment is confirmed.

Key Principles

ESP Foundation believes that:

- All children have a right to be protected from harm and abuse.
- The welfare of the child is paramount and takes precedence over the needs of parents or carers.
- Safeguarding requires vigilance, openness, respect and professional curiosity.
- All staff and volunteers should feel confident to raise concerns about poor or unsafe practice.

Reporting Concerns

Safeguarding is everyone's responsibility. Any concern, no matter how small, must be reported immediately.

Step 1 – Report to the Designated Safeguarding Lead (DSL):

- DSL: Eartha Pond, CEO
- If unavailable, report to the Deputy Safeguarding Lead or the Safeguarding Trustee, Cristalina Fernandes-Bates.

Step 2 – If the DSL or Deputy DSL cannot be reached:

- Contact the relevant Local Authority Children's Social Care team directly.
- If a child is in immediate danger, call the police on 999.

Step 3 – Record the concern:

- All concerns must be recorded on the confidential incident form and stored in the agreed secure safeguarding records location.
- Records must be factual, dated, signed and stored securely.

Allegations Against Staff, Volunteers or Trustees

ESP Foundation takes all allegations against staff, volunteers, contractors, or trustees extremely seriously.

An allegation is where it is claimed that an individual has:

- behaved in a way that has harmed a child, or may have harmed a child
- committed a criminal offence against or related to a child
- behaved in a way towards a child or children that indicates they may pose a risk of harm
- behaved in a way that indicates they may be unsuitable to work with children

Procedure:

- Any allegation must be reported immediately to the DSL.

- The DSL will inform the Local Authority Designated Officer (LADO) and follow local procedures for managing allegations against adults who work or volunteer with children.
- If the allegation is against the DSL or CEO, the matter must be referred directly to the Chair of Trustees, who must seek LADO advice.
- Staff must not investigate allegations themselves. Investigations will follow statutory and local authority processes.
- Records must be factual, dated, signed and stored securely.

Reassurance for Reporters

- Anyone raising a concern will be treated with respect and their concern taken seriously.
- Concerns can be raised in confidence. Whistleblowing protections apply.
- Confidentiality is respected, but safety of the child will always come first.

Responsibilities

- Trustees: Maintain safeguarding policy oversight and review safeguarding arrangements.
- Designated Safeguarding Lead (DSL): Hold lead responsibility for safeguarding practice and referrals.
- All staff and volunteers: Complete safeguarding training and report concerns immediately.

KEY CONTACTS

Designated Safeguarding Lead – Eartha Pond – 07388911983

Tri-Borough LADO: Rochelle-Ann Naidoo on 020 7641 1610 or LADO@westminster.gov.uk. NSPCC helpline: 0808 800 5000.

Westminster Access Team – Tel: 020 7641 4000

Tri-Borough MASH Business Support Officer (Karen Duncan) - Telephone: 020 7641 3991 Email: kduncan1@westminster.gov.uk

Police: call 999 in an emergency. For non-emergency police matters, call 101.

APPENDIX 1: GUIDANCE DOCUMENTS AND ADDITIONAL SAFEGUARDING RISKS

Relevant local Multi-Agency Safeguarding Partnership procedures and London Child Protection Procedures should be followed where safeguarding concerns arise. Staff should use the most current version available from the relevant local safeguarding partnership.

Keeping Children Safe in Education, current statutory guidance from the Department for Education, should be considered where applicable to ESP Foundation's work with children and young people.

Working Together to Safeguard Children, current statutory guidance, sets out multi-agency expectations for organisations and agencies working with children and families. Staff should also refer to guidance on what to do if they are worried a child is being abused.

Additional safeguarding risks staff must be aware of include domestic abuse and violence, online safety, sharing of nude or semi-nude images, child sexual exploitation, child criminal exploitation, trafficking and modern slavery, female genital mutilation, honour-based abuse, forced marriage, non-recent abuse, radicalisation and Prevent concerns, bullying, missing children, and harm outside the home. Staff must seek advice from the DSL and follow reporting procedures where any of these risks are suspected.

APPENDIX 2: Guidance on potential signs of abuse and neglect. Staff should refer to current London Child Protection Procedures and relevant Multi-Agency Safeguarding Partnership guidance when recognising and responding to concerns.

Monitoring and Review

The Trustee Board will review this policy annually. Updates will be made sooner if new statutory guidance is issued. All staff and volunteers will be informed of changes and required to follow the updated policy.

The annual review must include confirmation that safeguarding training requirements, safer recruitment procedures, media and device use rules, lone working arrangements, missing child procedures, first aid escalation, LADO referral arrangements and statutory guidance references remain current and understood by staff, volunteers and trustees.