

# SAFEGUARDING FRAMEWORK

**Policy:** Safeguarding Framework

**Policy Owner:** DSL team

**Date Published:** September 2018 **Date Amended:** August 2025

**Policy Aim:**

- This policy is made in accordance with AllChild's Mission that all children arrive at the end of the education setting on track to flourish in adulthood.
- AllChild believes that it is always unacceptable for a person to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all people by a commitment to practice which protects them from harm and abuse (as defined in Appendix 1).

**Employee Contract Context:**

- This policy does not form part of AllChild's contract of employment
- At the absolute discretion of the employer, this policy may be amended at any time as considered appropriate and in keeping with employment legislation

**Policy Application:** This policy applies to all staff, contractors and volunteers at AllChild

**Policy Templates/Forms:**

- Cause for concern form
- Delivery Partner reporting process

**Further Reading:**

- AllChild Managing Allegations Against Staff
- Code of Conduct
- Confidential Information Policy
- AllChild Professional Boundaries and Protecting Self
- AllChild Positive Handling
- Safer Recruitment Policy

Please contact the DSL team should you have any queries

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## 1. Introduction

In line with KCSIE 2025 updates – emphasis on early intervention, protection from harm (both online and offline) and promoting the best outcomes for all children, including: Providing help and support to meet the needs of children as soon as problems emerge.

This policy is made in accordance with AllChild's Mission that all children arrive at the end of the education setting on track to flourish in adulthood.

AllChild believes that it is always unacceptable for a person to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all people by a commitment to practice which protects them from harm and abuse (as defined in Appendix 1).

AllChild has a duty to ensure children are safeguarded and their wellbeing promoted in line with the Children's Act 1989 and 2004 and the Children's and Social Care Act 2017. As our work is based in schools we also work within the statutory guidance from the DfE 'Keeping Children Safe in Education (HM Government 2023).

AllChild's Safeguarding Framework should be read alongside the statutory guidance [Working together to safeguard children - GOV.UK](https://www.gov.uk/government/publications/working-together-to-safeguard-children-2) [https://www.gov.uk/government/publications/working-together-to-safeguard-children—2](https://www.gov.uk/government/publications/working-together-to-safeguard-children-2) and the DfE advice What to do if you are Worried a Child is Being Abused – Advice for Practitioners <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused>

Furthermore, relevant Local Authority policies and procedures, including LSCB protocols, are adhered to through our policy, and also by ensuring that all Delivery Staff are trained by their LSCB in advanced level Safeguarding and multi-agency working (see later in policy for list of local authorities).

We recognise the welfare of any person is paramount and all children and vulnerable young adults, regardless of age, disability, gender, ethnicity, religious belief and sexual orientation or identity have the right to protection from all types of harm and abuse. Being subjected to harassment, violence and/or abuse may also breach children's rights, as set out in the Human Rights Act. All staff should understand the importance of the Equality Act 2010 and ensure no child is unlawfully discriminated against, they should consider how they are supporting children with protected characteristics and take positive action, where proportionate, to deal with the disadvantages these children face. This includes a need to be conscious that children with protected characteristics may be more at risk of harm.

AllChild will therefore:

- Raise awareness of the need to protect children and vulnerable young adults and reduce risks to them
- Work in partnership with stakeholders and other agencies to promote and safeguard welfare
- Ensure that staff in contact with children and vulnerable young adults will have the requisite knowledge, skill and qualifications to carry out their jobs safely and effectively
- Ensure safe practice when working in partnership with other organisations · Maintain an organisation that is safe for staff and children and vulnerable young adults and an environment where poor practice is challenged
- Ensure that all staff, delivery partners, associates, volunteers, young people and board members who will be undertaking Regulated Activity undertake the required checks outlined in AllChild's Safer Recruitment Policy
- Ensure that when abuse is suspected or disclosed, that clear and appropriate action is taken as outlined in this Safeguarding Framework

- Ensure that the board, chief executive officer and members of the senior leadership team are accountable for the effective implementation of this policy and framework
- Ensure that all staff are able to access AllChild's Safeguarding Framework and are provided a briefing in induction and understand their responsibilities.
- Ensure self-audit activities, using the NSPCC standards of good practice, identify where the application of safeguarding procedures and good practice are being applied
- Ensure all delivery staff read Part 1 and Annex A of 'Keeping Children Safe in Education' 2025

### **Purpose of the policy**

To safeguard and promote the welfare of all children, defined as:

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

To ensure that all employees and others covered by this policy understand and comply with AllChild's Safer Recruitment Policy.

To provide all employees with guidance on how they should behave if they suspect that a child and or vulnerable young adult may be experiencing, or be at risk from some form of abuse.

To guide employees on how to respond to and report protection concerns.

### **To whom the policy applies**

This policy applies to all paid employees, volunteers and contracted staff working on behalf of AllChild in any capacity and in any setting.

## **2. Recruiting and supporting staff**

Staff have a responsibility to safeguard and promote the welfare of the children and vulnerable adults with whom they work. It is the responsibility of staff to promote good practice and minimise and manage potential risks. All staff, including contract staff and associates, must be aware of the requirements within these procedures.

It is the responsibility of managers to ensure that the staff they line-manage are aware of and understand the procedures and have levels of knowledge and skills commensurate to the level and nature of their direct involvement with children and vulnerable young adults.

Therefore:

- All AllChild staff will be aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that staff are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to a member of the DSL team and/or the director of people and culture regarding Safer Recruitment or CEO regarding Managing Allegations Against Staff
- All AllChild staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will

overlap with one another, therefore staff should always be vigilant and always raise any concerns with the designated safeguarding lead team

- Professionals should be alerted for the need for early help for children who:
- Frequently go missing from education
- Have experienced multiple suspensions, or is at risk from permanent exclusion
- Has a parent or carer in custody or is affected by parental offending
- All AllChild staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead team should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines
- All AllChild staff should be aware that technology is a significant component in many safeguarding and welfare issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
- All AllChild staff are subject to the checks outlined in AllChild's Safer Recruitment Policy and are encouraged to sign-up for the DBS update service. All new delivery staff starting at AllChild will obtain an update or new certificate regardless of the date of their previous issue. These will be updated at a maximum of every three years.
- All staff are supervised and supported in their work
- Link Workers receive specialist supervision from a qualified, external supervisor
- All staff work to AllChild policies and procedures, which are reviewed and updated as necessary
- All staff receive training in child and vulnerable young adult protection at a level appropriate to their role
- All staff have training and support as required to effectively discharge their responsibilities.
- All staff should receive appropriate safeguarding and child protection training (including online safety, which, among other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

### 3. Code of Conduct and Required Behaviours

The role of the Designated Safeguarding Lead team (DSL's) Responsibilities include:

- Being the first point of contact for reports of concerns
- Providing advice and support to employees reporting disclosures or concerns

See AllChild Professional Boundaries policy for full guidance on required behaviours for working with children, young people and their families.

The most senior designated safeguarding leads (Jenny Muter and Mark Evans, Kate Welsh on maternity leave 2025/26) should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

#### **The role of the Safer Recruitment Lead (People and Culture Director)**

Responsibilities include:

- Ensuring that all employees and volunteers in regulated roles undertake the checks required in AllChild's Safer Recruitment Policy

### Staff

It is important that staff work to a high standard of professional conduct and act with integrity at all times, to minimise the risk of abuse from within AllChild. It is important to create a work environment where the risk of abuse is minimised.

Staff should make sure that they have a working knowledge of the different forms of abuse and possible indicators. Please see Appendix 1.

## 4. Procedures for managing disclosures and allegations

### AllChild's role in protection of children and vulnerable adults

AllChild staff have no powers to investigate abuse. Nonetheless AllChild, staff and volunteers have a duty to safeguard and promote the welfare of children and vulnerable young adults and a responsibility to work closely and co-operatively with other agencies in order to achieve this. Staff may have a role as referrers, witnesses or supporters of people involved in child and vulnerable young adult protection processes.

### Confidentiality and the possible impact on the person

In any work with children and vulnerable young adults it is important to be clear about confidentiality. Personal information held by AllChild is subject to a legal duty of confidence, and should not normally be disclosed without the subject's consent. However, the Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. It is particularly important for staff to provide LGBTQ+ children with a safe space for them to speak out or share their concerns with members of staff.

### Do not promise to keep secrets

Should it become necessary to pass on personal information to another party, this decision should always be discussed with the subject and where possible their cooperation sought beforehand. Explanations of the reasons; the processes; the likely sequence of events; who to contact for information or for support should also be provided.

### Confidential record-keeping

All concerns and any discussions about a subject's welfare should be recorded in writing whether or not further action is taken. It is important that concerns raised are recorded accurately and in detail. All discussions should end with clear and explicit recorded agreement about who will be taking what action. Where no further action is the outcome the reason for this should be clearly recorded. At AllChild all records are made and kept on CPOMS, a secure digital safeguarding platform. Where CPOMS can't be used staff and delivery partners should immediately complete a Cause for Concern form and send it password protected to [safeguarding@westlondonzone.org](mailto:safeguarding@westlondonzone.org)

### Designated Safeguarding Lead Team

Name	Title	Work no.
Mark Evans	Director of Delivery Excellence	07741900288/07980312530

<b>Kate Welsh</b>	Communities Director	02079984044/07387015515
<b>Rebecca Farrell</b>	Head of Community Delivery	02079984044/07388994198
<b>Rebecca Bryce</b>	Head of Community Delivery	02079984044/07999027636
<b>Denni Sandells</b>	Delivery & Safeguarding Officer	02079984044/07483965932
<b>Jenny Muter</b>	Regional Director	07896194988
<b>Amy O'Toole</b>	Head of Community Delivery	07754558912
<b>James Dunbar</b>	Head of Delivery Partner Success	07771413010

All relevant Local Authority / Local Safeguarding Children Board / LADO contacts are found at:

- London Borough of Hammersmith and Fulham: <https://www.lbhf.gov.uk/children-and-young-people/children-and-family-care/child-protection>
- Royal Borough of Kensington and Chelsea <https://www.rbkc.gov.uk/lscp/information-professionals-and-volunteers/useful-safeguarding-contacts-professionals>
- Westminster City Council <https://www.rbkc.gov.uk/lscp/information-professionals-and-volunteers/useful-safeguarding-contacts-professionals>
- London Borough of Brent <https://www.brent.gov.uk/services-for-residents/children-and-family-support/keeping-children-safe/contact-our-protection-team/>
- Wigan Council <https://www.wigan.gov.uk/Business/Professionals/Early-Years-and-Childcare/Safeguarding-and-Welfare.aspx>

The responsibilities of the Designated Safeguarding Lead team include:

- Developing AllChild's approach to Safeguarding, reviewing the policy and procedures on a regular basis, annually as a minimum
- Monitoring and auditing referrals/cases reported and working with the Senior Management
- Team to ensure resolution, referring concerns to Social Services when appropriate
- Auditing the operation of the policy and procedures
- Arranging training for staff to ensure that the policy and procedures are implemented throughout the organisation
- Liaising with other agencies
- Retaining all records of referrals/cases for at least 10 years.

### What to do if someone discloses an abusive act or experience

All staff should always consider that children and young people may not feel ready or know how to tell someone they are being abused.

However, if a child or vulnerable young adult confides to a member of staff that they are being, or have been, abused, the staff member should:

- React calmly and tell the person they were right to tell
- Take what is said seriously. Be clear that they cannot keep secrets and that they have to pass on information if they think the person has been or is being harmed in some way
- Only ask questions if they need to clarify what they are being told—they should not ask about explicit details
- Do not ask leading questions

- Make a full written record of what is being said, heard and seen as soon as possible, including information in relation to the date, the time, the place where the alleged abuse took place, the name of the person receiving the information or who has the concern and the names of others present, the name of the complainant and, where different, the name of the child or vulnerable young adult who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation. If there is an immediate danger, seek further advice from the Designated Safeguarding Lead at the school and/or at AllChild before recording a written record, or call the police yourself immediately if warranted.
- Immediately pass the information onto the AllChild Designated Safeguarding Lead team and to the Designated Safeguarding Lead at the school which the child or vulnerable young adults attends (children's centre, school, job centre or any other institution). The school DSL will take the decision to record and monitor the allegation, or refer to Social Services.
- It is likely that the school will have its own Cause for Concern or Safeguarding referral form, which should be used where possible and submitted to the school DSL in addition to entering the concern on the AllChild CPOMS system which alerts the AllChild Designated Safeguarding Lead team.

### **Process and recording and referral**

Where concerns relate to someone below their 18th birthday, any suspicion, allegation or incident of abuse must be reported to the AllChild Designated Safeguarding Team via a written record on CPOMS and the DSL at the school immediately and certainly on the same working day. In the unlikely event that a member of AllChild's Designated Safeguarding Lead team is not available the matter should be reported to another member of AllChild's Senior Management Team. If the school DSL is not available, they should report the matter to another member of the Senior Management Team at the school. The school will take the lead on the immediate decision as to whether to monitor and record the allegation, or refer to Social Services.

### **Follow-up**

If the AllChild DSL team considers the concern to be of a seriousness that may warrant further referral by the school to social care, they will ask the Link Worker to report back to them on what action the school DSL has taken. In circumstances where the school DSL does not make a further referral, the AllChild DSL team may discuss this directly with the school DSL, and make a social care referral themselves if they feel the situation demands it.

### **Process and recording and referral – outside of school term time, evenings and weekends**

If a concern is raised about a child/young person outside of term time, it is most likely that the school Designated Safeguarding Lead will not be available. In this case, concerns should be recorded on CPOMS on the same day and the AllChild Designated Safeguarding Lead team will decide whether to refer directly to Social Services or to seek further advice from the Local Area Designated Officer (LADO).

## **5. Responding to allegations of abuse or inappropriate or dangerous behaviour by a member of staff**

Regardless of the age of the person in question, if an allegation of abuse or inappropriate conduct is made against a member of staff (school or AllChild), or person in a position of trust, then this must be reported to AllChild's CEO Louisa Mitchell immediately, or the school Headteacher in relation to school staff (depending on what the school's policy states). Please refer to the AllChild Managing Allegations Against Staff policy for more detail.

## **6. Child and vulnerable adult protection and safeguarding arrangements when working with other organisations**



### **Overriding principles**

It is important that all staff and associates recognise the importance of working co-operatively with other agencies in managing situations where children and vulnerable young adults may be at risk.

When AllChild is working in partnership with another organisation, in whatever capacity, it must be determined beforehand which organisation and member of staff will be responsible for leading on child and vulnerable young adult protection issues. Once that has been determined, the process described above in 'What to do if someone discloses an abusive act or experience' should be followed, with the school Designated Safeguarding Lead being informed immediately so as to follow the schools Safeguarding policy as well as this framework. In cases where the Delivery Partner works in a school, they can make contact directly with the school's designated safeguarding lead (DSL) without informing the AllChild Link Worker or AllChild DSL team.

### **Ensuring partner organisations have arrangements in place**

When AllChild works with another organisation, we will ensure that the partner organisation has appropriate safeguarding policies in place, which will include child and vulnerable young adult protection policies and procedures and gain written confirmation that they will work within AllChild Safer Recruitment Policy: Section on Delivery Partners and formal complaints procedures for service users.

Procedures for addressing child and vulnerable young adult protection and any other poor practice concerns are detailed in contracts and service level agreements. AllChild will have a standard statement to this effect in all contracts.

If a member of staff becomes aware of allegations of abuse relating to a partner organisation, this should be discussed in the first instance with the Designated Safeguarding Lead (Kate Welsh, Communities Director)

## **7. Media and publications**

Please refer to AllChild Media Policy and Procedure.

## **8. Policy review**

AllChild undertakes to review this safeguarding policy and related policies and procedures annually and update them on the basis of developing practice, learning and experience and when there are changes in relevant Government legislation and guidance.

## **9. Other significant aspects of safeguarding**

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

Other safeguarding issues all staff should be aware of include:

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or

facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Child Criminal Exploitation**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### **Child Sexual Exploitation**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

## **PREVENT**

The current threat from Terrorism and Extremism in the United Kingdom is 'substantial' and can involve the exploitation of vulnerable people, including children and young people.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Also included in the definition of extremism are calls for the death of members of our armed forces, whether in the UK or overseas (HM Government Prevent Strategy, 2011).

PREVENT is a key part of the Government's strategy to stop people becoming terrorists or supporting terrorism. Early intervention is at the heart of PREVENT in diverting people away from being drawn into terrorist activity.

PREVENT happens before any criminal activity takes place. It is about recognising, supporting and protecting people who might be susceptible to radicalisation.

All staff should have an awareness of the PREVENT agenda and the various forms of radicalisation takes in being able to recognise signs and indicators or concern and respond appropriately. Any identified concerns as the result of observed behaviour or reports of conversations to suggest that the young person supports terrorism and/or extremism, must be reported to the named designated safeguarding professional immediately and no later than the end of the working day.

### **Violence Against Women and Girls (VAWG)**

The term "Violence Against Women and Girls (VAWG)" defines the range of serious violent crime types which are predominantly, but not exclusively, experienced by women and girls.

The Shared Services Violence Against Women and Girls (VAWG) Strategic Partnership is committed to delivering a coordinated community response to violence against women and girls in the London Borough of Hammersmith & Fulham, the Royal Borough of Kensington and Chelsea and the City of Westminster. This includes providing multiagency support for people experiencing a range of issues including:

- domestic violence and abuse (including coercive control)
- sexual violence including rape
- sexual exploitation
- sexual harassment
- stalking
- 'honour'-based abuse
- forced marriage
- faith-based abuse
- female genital mutilation (FGM) or cutting
- prostitution and human trafficking

AllChild recognises the significance of this strategy, and ensures that staff are aware of and will understand its principles.

### **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All delivery staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Any Cause for Concern reporting should consider such factors so it is important that school DSL's and or AllChild DSL team are provided with as much information as possible as part of the reporting process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

### **Female Genital Mutilation**

All staff should speak to the designated safeguarding lead team with regard to any concerns about female genital mutilation (FGM) so that they can speak to the school DSL as there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### **Child-on-child abuse**

The DfE's advice on Sexual violence and sexual harassment between children in schools and colleges (DfE, 2021) is now incorporated in the statutory guidance Keeping Children Safe in Education (DfE, 2022) and the term peer-on-peer abuse is no longer used.

All staff should be aware that children can abuse other children. And that it can happen both inside and outside of school or college, at home, in the community and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. If staff have any concerns regarding child-on-child abuse they should speak to the designated safeguarding lead team.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children and young people, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up", or "boys being boys" can lead to a culture of unacceptable behaviour, an unsafe environment for children and, in worst-case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. It is important to explain to children and young people that the law is in place to protect rather than criminalise them.

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

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

Response to child on child abuse:

Follow the schools anti-bullying policy. If the incident happens outside of term time then complete an incident and accident form and speak to the DSL on duty.

### Attendance

In the event that a child does not attend a session, activity or meeting that they were expected to attend, this should be treated seriously and dealt with urgently. Immediate efforts should be made to contact the child and/or parents, and other relevant professionals (e.g. school staff) should be alerted quickly. For example, if a child does not attend an after-school tutoring session, and you have seen them walking out the gate towards home, do not assume they are going (or will arrive) home. You must contact parents immediately to inform them their child is missing from their expected session.

See AllChild 'Managing Consents and After School Activities' process for further step by step detail on monitoring and responding to attendance issues.

### **Children who are absent from education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further information and support, includes:

- Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children having unexplainable and or persistent absences from education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education.

### **Serious violence**

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

### **Mental health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. AllChild staff are not trained mental health professionals, however, Link Workers are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child, immediate action should be taken, following the AllChild Safeguarding Framework, and speaking to the designated safeguarding lead team and school DSL

### **Domestic abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours and can be

psychological, physical, sexual, financial and/or emotional. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act). Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Children and young people can be impacted through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. Depending on the age of the young people, a domestic abuse experience in their own intimate relationship may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

### Online safety

Children and young people on the AllChild programme do not use/have access to AllChild hardware or software, therefore Link Workers in school should adopt the school Online Safety policies. AllChild supports school communication with parents and carers to reinforce the importance of children being safe online and may share school information with parents/carers about: what systems the school has in place to filter and monitor online use, what the school are asking children to do online and who from the school (if anyone) their child is going to be interacting with online.

AllChild may need to adapt its programme delivery to remote delivery in exceptional circumstances (as with the COVID19 pandemic), it may be desirable to maintain contact with children and families using telephone, social media, or video conferencing platforms.

These can present additional considerations for safeguarding children and young people, and many of the following guidelines are taken from the Local Safeguarding Children Partnership’s advice to providers in the Tri-Borough issued in March 2020.

There is a renewed focus on filtering and monitoring systems within schools, to prevent children and young people access to inappropriate online content. It is important for AllChild link workers to know what the school systems are, and be confident that their cohort’s internet usage is being monitored and filtered. If there are any concerns, these should be flagged to the school DSL.

It is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group

In the Keeping Children Safe in Education update (2025) the of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and



- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

**Live webcam contact sessions / online messaging:**

- All practitioners should be mindful of professional standards when using online messaging platforms (such as WhatsApp) or live webcam sessions (such as Facetime)
- Practitioners should not use personal devices and should use work provided equipment
- Practitioners and children/young people must wear suitable clothing, as should anyone else in the household
- Language must be professional and appropriate, including any family members who may be in the background
- Any computers/devices used should be in appropriate areas, for example, not in bedrooms; and where possible be against a neutral background. Practitioners should ensure there are no identifying features that would allow the practitioner's home address to be identified
- The live contact should be recorded and backed up elsewhere, so that if any issues were to arise, the video can be reviewed. This should be made clear to all participants · Remote and live quality assurance should be able to take place to monitor video conferencing sessions in real time – participants to be made aware of this at start of any session
- Live contact should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day
- All practitioners must continue to be aware of safeguarding obligations and to report safeguarding concerns if they arise
- Data Controllers (in ALLCHILD and Delivery Partners) need to reassure themselves that any contact software and/or platforms selected are suitable and raise no privacy issues; or use cases against the provider's terms and conditions (for example, no business use of consumer products)

**Looked after Children and Previously Looked after children**

Although it may not be common to have Looked after children and previously looked after children on the AllChild Program – it is important that staff have the skills, knowledge and understanding to keep looked after children safe. The most common reason for children becoming looked after is as a result of abused and/or neglect and staff should continue to monitor the children's wellbeing with the school. It is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group

In particular, they should ensure that appropriate staff have access to the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

- It is crucial that Salesforce is updated with accurate information of current carers contact details to ensure the safety of the child.

## APPENDIX 1: DEFINITIONS AND CONCEPTS IN CHILD AND VULNERABLE ADULT PROTECTION CHILDREN

As per Children Act 1989 and Children Act 2004, a child is anyone who has not yet reached his or her 18th birthday.

### Vulnerable adult

An adult at risk could be a person who is 18 years or older and who has a dependency on others, or a requirement for assistance from others, in the performance of basic physical functions or is in need of community care services by reason of mental or other disability, age or illness; has a severe impairment in their ability to communicate with others or has an impairment in their ability to protect themselves from assault, abuse, neglect, harm or exploitation. This may include a person who:

- is a substance misuser
- is homeless
- is isolated with minimal interaction with friends and family

### Significant harm

There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes a single traumatic event may cause significant harm e.g. violent assault, suffocation, poisoning. More often however, it is the cumulative effect of incidents and/or behaviours which over time significantly impair the child's or young adult's physical and psychological development.

### Indicators of abuse and neglect

#### Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

#### Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

#### Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.



It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### Sexual abuse

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

The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse)

In addition, sexual abuse includes abuse of children through sexual exploitation. Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. However, where a child is under the age of 13 it is classified as rape under s5 [Sexual Offences Act 2003](#). See [Part B1, Practice Guidance](#).

### Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Further detail on types of abuse can also be found in Annex A of 'Keeping Children Safe in Education' (HM Government 2025)

## **APPENDIX 2: DELIVERY PARTNER CAUSE FOR CONCERN PROCESS**

1. Please report your concern immediately in school, to the school Designated Safeguarding Lead, following the school safeguarding reporting procedure. If for any reason you are unable to notify the school DSL, you must call the AllChild DSL team as soon as possible:
  - Kate Welsh (DSL) 07387015515
  - Mark Evans (DSL) 07741900288
2. Make a full written record of what was said, heard and seen as soon as possible, on either the school or the AllChild cause for concern form\*.
  - Please e-mail the completed form (ensuring this is password protected) directly to the school's Designated Safeguarding Lead. Please copy in [safeguarding@allchild.org](mailto:safeguarding@allchild.org). You are not required to inform the Link Worker before doing so. The completed form should be provided to the school DSL immediately so they can take any action necessary.

(\*Delivery partners may have their own safeguarding reporting procedures but, while working in schools, points

1 and 2 must be followed immediately - you are likely to simultaneously be completing your organisation's safeguarding reporting procedure. As Delivery Partners are contracted by AllChild not the school, please ensure these steps are followed to adhere to our safeguarding policy).