

Bespoke Mentoring

Safeguarding, Child Protection and Adult Safeguarding Policy

BESPOKE MENTORING

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BESPOKE MENTORING

Safeguarding, Child Protection and Adult Safeguarding Policy

Supporting Children, Young People and Adults Through Alternative Provision, Mentoring and Community-Based Services

This policy applies to all children, young people and adults accessing Bespoke Mentoring's Alternative Provision, mentoring, community-based and transition-to-adulthood services and reflects our commitment to providing safe, inclusive and person-centred support across all areas of service delivery.

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Introduction

This policy sets out Bespoke Mentoring's commitment to safeguarding and promoting the welfare of all children, young people and adults who access our services. It provides the framework through which staff, volunteers, contractors and partner agencies work together to identify, respond to and manage safeguarding concerns effectively.

Bespoke Mentoring delivers Alternative Provision, mentoring, community-based interventions and transition-to-adulthood support across Gloucestershire, Herefordshire, Worcestershire and Monmouthshire. We recognise that many of the individuals we support

may have experienced trauma, adversity, disrupted education, exploitation, social care involvement, mental health difficulties or other complex life circumstances that increase their vulnerability.

This policy applies to all children, young people and adults receiving support through Bespoke Mentoring, including vulnerable young people aged 16–18 and adults who may require safeguarding support. It reflects our commitment to child-centred and person-centred practice, transitional safeguarding and effective partnership working to promote safety, wellbeing and positive outcomes.

The policy has been developed in accordance with current legislation, statutory guidance and recognised safeguarding best practice. It should be read alongside Bespoke Mentoring's related policies, procedures and operational guidance.

All staff share responsibility for safeguarding. Every member of the organisation is expected to understand their safeguarding responsibilities, remain professionally curious, act promptly on concerns and contribute to a culture in which safeguarding is everyone's responsibility.

1. Policy Statement

At Bespoke Mentoring, safeguarding is everyone's responsibility. Guided by our core values of **Love, Support and Guidance,** we are committed to safeguarding and promoting the welfare of all children, young people and adults who access our services.

We provide Alternative Provision, mentoring, community-based support and transition-to-adulthood services. We recognise that many of the individuals we support may experience vulnerability due to trauma, exploitation, disability, special educational needs and disabilities (SEND), mental health difficulties, social care involvement or other complex life circumstances. We therefore adopt a child-centred, person-centred and transitional safeguarding approach, recognising that safeguarding responses should be informed by an individual's needs, strengths and circumstances rather than age alone.

We are committed to creating safe, trusting and inclusive environments where the voice, wishes and feelings of children, young people and adults are listened to, respected and acted upon. Concerns will always be taken seriously and responded to promptly through effective partnership working with families, carers, commissioning schools, local authorities and safeguarding partners.

This policy sets out Bespoke Mentoring's arrangements for safeguarding and protecting children, young people and adults at risk. It should be read alongside relevant legislation,

statutory and non-statutory guidance, organisational procedures and related safeguarding policies.

2. Scope

This policy applies to all individuals working for or on behalf of Bespoke Mentoring, including:

- Employees
- Managers
- Mentors
- Sessional Staff
- Volunteers
- Agency Staff
- Contractors
- Consultants
- Students on Placement

Safeguarding responsibilities apply regardless of role, location or contractual status.

Services Covered by this Policy

This policy applies to all activities delivered by Bespoke Mentoring, including:

Outreach

- Mentoring
- Educational support
- Vocational interventions
- Employability support
- Community-based programmes
- Transition to adulthood support
- Home-based learning support (where authorised)
- Online and remote mentoring

Group-Based Provision

- Alternative Provision programmes
- Group mentoring
- Therapeutic interventions
- Educational group sessions
- Behaviour and engagement programmes
- Employability and life-skills programmes
- Vocational learning
- Personal development programmes
- Group interventions delivered within Alternative Provision settings

Alternative Provision and Community-Based Delivery

This policy applies to safeguarding activity taking place within:

- Alternative Provision settings
- Learning centres
- Partner educational settings
- Vocational training venues
- Community venues
- Outdoor learning environments
- Public spaces
- Work experience and vocational placements
- Online environments

Where group work takes place within Alternative Provision settings, staff must remain alert to safeguarding risks including child-on-child abuse, bullying, sexual harassment, harmful sexual behaviour, peer influence, group conflict, exploitation, online harms, attendance concerns and disengagement from education.

Appropriate staffing ratios, supervision arrangements, risk assessments and safeguarding procedures must be in place to ensure the safety and welfare of all individuals accessing our services.

Transport and Off-Site Activities

This policy applies when:

- Transporting children, young people or adults
- Attending external activities

- Undertaking educational visits
- Delivering community-based sessions
- Supporting individuals in public spaces
- Delivering off-site learning or vocational activities

Digital and Online Environments

This policy applies to all online interactions undertaken on behalf of Bespoke Mentoring, including:

- Virtual learning
- Online mentoring
- Digital communication
- Learning platforms
- Remote engagement activities
- Use of digital technologies and Artificial Intelligence (AI)

Individuals Covered by this Policy

This policy applies to:

- Children under the age of 18
- Young people aged 16–18 attending Alternative Provision
- Young people preparing for adulthood
- Care experienced young people
- Young adults aged 18+
- Adults with care and support needs
- Adults who may be vulnerable to abuse, neglect, exploitation or harm

Where an individual is under the age of 18, child protection procedures will apply. However, Bespoke Mentoring recognises that safeguarding risks frequently continue beyond the age of 18. Staff must therefore adopt a transitional safeguarding approach and consider both child and adult safeguarding frameworks where appropriate to ensure continuity of protection and support.

Safeguarding responsibilities apply regardless of where services are delivered and whether support is provided on an outreach basis, in groups, online, within Alternative Provision settings or within the wider community.

3. Key Principles

Bespoke Mentoring adopts the following safeguarding principles, which underpin all aspects of our practice, decision-making and service delivery.

Child-Centred and Person-Centred Practice

The welfare, safety and wellbeing of children, young people and adults accessing our services is central to all safeguarding activity.

We are committed to ensuring that every individual is seen, heard and understood. The voice, wishes and feelings of children, young people and adults will be sought, listened to, recorded and taken into account when making decisions about their safety, wellbeing and support.

Individuals will be encouraged and supported to participate in decisions that affect them wherever appropriate.

All safeguarding concerns will be taken seriously and acted upon without delay.

Transitional Safeguarding

Bespoke Mentoring recognises that vulnerability does not suddenly end at age 18.

We adopt a transitional safeguarding approach that recognises the needs of older adolescents and young adults who may continue to experience risks associated with exploitation, abuse, neglect, mental health difficulties, social isolation, criminality, homelessness, substance misuse, adverse childhood experiences and other vulnerabilities.

Safeguarding responses will consider an individual's developmental stage, lived experience, support networks, mental capacity, level of independence and presenting risks, rather than relying solely on chronological age.

Trauma-Informed Practice

We recognise that behaviour is a form of communication and may reflect trauma, adversity, unmet need, emotional distress or previous experiences of harm.

Staff will seek to understand the reasons behind an individual's behaviour and respond in a way that promotes safety, trust, resilience, empowerment and positive relationships.

Contextual Safeguarding

We recognise that harm may occur in a range of environments beyond the family home, including schools, Alternative Provision settings, workplaces, peer groups, communities, public spaces, transport networks and online environments.

Safeguarding assessments and interventions will consider the wider contexts in which individuals live, learn, work and socialise.

Professional Curiosity

Staff are expected to remain professionally curious, actively seek to understand the lived experiences of those they support and respectfully challenge assumptions where concerns exist.

We recognise the importance of looking beyond presenting behaviours and considering the wider circumstances that may impact upon an individual's safety, wellbeing and vulnerability.

Early Intervention and Timely Action

Safeguarding concerns should be identified and responded to as early as possible.

Where concerns arise, staff are expected to take prompt action, report concerns immediately and follow safeguarding procedures without delay. Early identification, intervention and support can significantly improve outcomes and reduce the risk of harm.

Partnership Working

Effective safeguarding relies upon strong partnership working.

Bespoke Mentoring is committed to working collaboratively with parents, carers, families, commissioning schools, local authorities, children's services, adult social care, health services, police and other relevant agencies to promote safety, wellbeing and positive outcomes.

Information will be shared appropriately, lawfully and proportionately to ensure individuals receive the right support at the right time.

Equality, Diversity and Inclusion

All children, young people and adults have an equal right to protection, support and opportunity regardless of age, disability, sex, race, religion or belief, sexual orientation, gender identity, cultural background or personal circumstances.

We recognise that some individuals may face additional barriers to recognising abuse, reporting concerns or accessing support and will take reasonable steps to ensure safeguarding arrangements are inclusive, accessible and responsive to individual needs.

Empowerment and Independence

Bespoke Mentoring is committed to supporting individuals to develop confidence, resilience, independence and self-advocacy skills.

Where appropriate, safeguarding practice will empower individuals to make informed choices, understand risk, build protective factors and achieve positive outcomes whilst ensuring that appropriate action is taken where there is a risk of harm.

4. Legal Framework and Guidance

Bespoke Mentoring will have regard to the most current versions of all relevant legislation, statutory guidance and recognised safeguarding best practice. References within this policy relate to the versions in force at the time of publication and should be read as including any subsequent updates or replacements.

Statutory Legislation

Children and Young People

- Children Act 1989
- Children Act 2004
- Education Act 1996
- Education Act 2002
- Children and Families Act 2014
- Children and Social Work Act 2017
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Modern Slavery Act 2015
- Domestic Abuse Act 2021
- Equality Act 2010
- Human Rights Act 1998
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)

Adults at Risk

- Care Act 2014
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Domestic Abuse Act 2021

- Serious Crime Act 2015
- Modern Slavery Act 2015
- Equality Act 2010
- Human Rights Act 1998
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)

Statutory Guidance

Child Protection and Safeguarding

- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children 2026
- Prevent Duty Guidance: England and Wales 2023
- Information Sharing: Advice for Practitioners Providing Safeguarding Services
- Relationships Education, Relationships and Sex Education (RSE) and Health Education guidance, where relevant
- **Statutory Guidance** (Modern Slavery: Statutory Guidance for England and Wales).

Adult Safeguarding

- Care and Support Statutory Guidance
- Mental Capacity Act 2005 Code of Practice
- Local Safeguarding Adults Board Procedures
- Multi-agency adult safeguarding procedures applicable to the areas in which Bespoke Mentoring operates

Alternative Provision and Transitional Safeguarding Guidance

Bespoke Mentoring recognises the unique safeguarding responsibilities associated with Alternative Provision, community-based delivery and support for vulnerable adolescents and young adults.

The organisation will have regard to:

- Alternative Provision statutory guidance
- Arranging Alternative Provision: A Guide for Local Authorities and Schools
- Non-school Alternative Provision: Voluntary National Standards
- SEND Code of Practice: 0–25 Years
- Alternative Provision Quality Toolkit and local authority commissioning expectations, where applicable
- Relevant guidance relating to attendance, inclusion and children missing education

- Wales Safeguarding Procedures, where services are delivered in Monmouthshire

Bespoke Mentoring also recognises the principles of Transitional Safeguarding and will seek to apply best practice approaches that support young people moving from children's services into adulthood where vulnerabilities and safeguarding risks continue beyond the age of 18.

Online Safety and Digital Safeguarding

The organisation will have regard to relevant guidance relating to:

- Online safety and digital resilience
- Cyber safety
- Artificial Intelligence (AI)
- Social media use
- Online exploitation
- Harmful online content
- Emerging technology-related safeguarding risks

Local Safeguarding Arrangements

Bespoke Mentoring operates across multiple local authority areas and will work in accordance with the safeguarding arrangements, procedures and referral pathways of the relevant:

- Safeguarding Children Partnerships
- Safeguarding Adults Boards
- Local Authorities (England & Wales)
- Police Forces
- Health Partners

applicable to the location in which services are delivered.

This policy will be reviewed annually, or sooner where changes to legislation, statutory guidance, safeguarding practice or organisational learning require amendment.

5. Roles and Responsibilities

Safeguarding Leadership and Responsibilities

At Bespoke Mentoring, safeguarding is led by a dedicated Safeguarding Team under the leadership of the Director of Safeguarding.

The team consists of experienced safeguarding professionals from a range of backgrounds, including education, child protection, alternative provision, social care, youth work and safeguarding practice. Together, they provide strategic oversight, operational leadership and safeguarding support across the organisation.

Safeguarding Leadership Structure

Managing Director

The Managing Director holds ultimate accountability for safeguarding across the organisation and is responsible for ensuring that effective safeguarding arrangements, resources, and governance systems are in place.

Head of Service

Responsible for ensuring safeguarding procedures are effectively implemented across all areas of operational delivery and that safeguarding remains central to service provision.

Safeguarding Team

Director of Safeguarding and Designated Safeguarding Lead (DSL)

Provides strategic leadership for safeguarding and overall responsibility for safeguarding and child protection arrangements across Bespoke Mentoring.

Deputy Designated Safeguarding Leads (DDSL)

Support the DSL and contribute to the day-to-day management of safeguarding and child protection across the organisation.

The Safeguarding Team

Bespoke Mentoring's Safeguarding Team works collaboratively as a single safeguarding function across the organisation, sharing operational safeguarding responsibilities and ensuring that staff, children and families have access to timely safeguarding advice, support and decision-making.

The team provides safeguarding oversight across all areas of provision, including:

- Outreach – Personalised Mentoring
- Group work
- Alternative Provision settings
- Community-based delivery
- Transport arrangements
- Online engagement

- Educational and vocational activities

The Safeguarding Team is responsible for:

- Managing safeguarding and child protection concerns.
- Providing safeguarding advice and support to staff.
- Making and supporting referrals to external agencies.
- Liaising with Children's Social Care, Police and safeguarding partners.
- Monitoring vulnerable children and safeguarding plans.
- Reviewing safeguarding records and LearnTrek reporting.
- Supporting risk assessment and safer working practices.
- Leading safeguarding audits, reviews and lessons learned.
- Delivering safeguarding training and guidance.
- Ensuring compliance with statutory safeguarding requirements.
- Delivering safeguarding training, briefings and updates to staff in response to changes in legislation, statutory guidance, emerging risks, safeguarding reviews and organisational learning.
- Developing and delivering safeguarding learning activities, including quizzes, case studies, reflective discussions and scenario-based exercises to test understanding and support professional development.
- Maintaining records of safeguarding training, attendance, knowledge checks and staff competency to evidence compliance and ongoing safeguarding awareness across the organisation.

While safeguarding responsibilities are shared across the Safeguarding Team, the Designated Safeguarding Lead retains lead responsibility for safeguarding and child protection arrangements in accordance with Keeping Children Safe in Education.

Safeguarding remains everyone's responsibility, and all staff have a duty to safeguard and promote the welfare of children and young people.

6. All Staff Responsibilities

Safeguarding is everyone's responsibility. All staff have a duty to safeguard and promote the welfare of children and young people and must always act in the best interests of the child.

All staff must:

- Read, understand and comply with this Safeguarding and Child Protection Policy.
- Read and understand **Part One (or Annex A, where appropriate)** of **Keeping Children Safe in Education (KCSIE)** and confirm this annually.
- Read and comply with other safeguarding guidance, procedures and statutory requirements relevant to their role.
- Attend mandatory safeguarding training and updates.
- Understand their responsibilities in relation to child protection, safeguarding and welfare.
- Maintain professional boundaries and adhere to the Staff Code of Conduct.
- Be alert to signs and indicators of abuse, neglect, exploitation and other safeguarding concerns.
- Understand that safeguarding concerns may present through a child's behaviour, appearance, emotional wellbeing, attendance, relationships or online activity.
- Recognise the additional vulnerabilities often experienced by children accessing Alternative Provision.
- Report safeguarding concerns immediately in accordance with organisational procedures.
- Record safeguarding concerns accurately, factually and promptly on LearnTrek.
- Share information appropriately to protect children from harm.
- Participate in safeguarding reviews, investigations and multi-agency processes where required.
- Contribute to a positive safeguarding culture where children feel safe, listened to and respected.

Staff must be able to identify:

- The Designated Safeguarding Lead (DSL)
- Deputy Designated Safeguarding Leads (DDSLs)
- How to report concerns
- How to escalate concerns if they believe appropriate action has not been taken

Professional Responsibility

No member of staff should assume that another person will take action on a safeguarding concern.

If a member of staff has concerns about a child, they must take responsibility for ensuring that the concern is reported, recorded and followed through in accordance with safeguarding procedures.

Failure to comply with safeguarding responsibilities may result in disciplinary action and, where appropriate, referral to relevant professional or regulatory bodies.

7. Types of Abuse and Safeguarding Risks Relevant to Bespoke Mentoring

Bespoke Mentoring recognises that the children, young people and adults accessing our services may be exposed to a wide range of safeguarding risks and vulnerabilities.

Given the nature of our Alternative Provision, mentoring and community-based services, staff should remain vigilant to indicators of abuse, neglect, exploitation and harm, including:

Abuse and Neglect

- Physical abuse
- Emotional abuse
- Psychological abuse
- Sexual abuse
- Neglect and acts of omission
- Self-neglect
- Financial or material abuse
- Domestic abuse
- Coercive and controlling behaviour
- Organisational abuse
- Discriminatory abuse

Exploitation and Criminality

- Child Criminal Exploitation (CCE)
- Adult Criminal Exploitation
- Child Sexual Exploitation (CSE)
- Sexual exploitation of adults at risk
- County Lines activity
- Cuckooing
- Modern slavery
- Human trafficking
- Serious violence

- Gang affiliation and associated violence

Harmful Practices

- Child-on-child abuse
- Bullying and cyberbullying
- Sexual harassment
- Harmful sexual behaviour
- Honour-based abuse
- Female Genital Mutilation (FGM)
- Forced marriage

Online and Digital Risks

- Online abuse
- Online grooming
- Sextortion
- Online exploitation
- Exposure to harmful content
- Radicalisation through online platforms
- Deepfakes and AI-generated harmful content
- Cyberbullying
- Unsafe use of social media
- Online scams and financial exploitation
- Misuse of Virtual Private Networks (VPNs)

Vulnerability and Welfare Concerns

- Mental ill-health
- Substance misuse
- Homelessness and housing instability
- Social isolation
- Attendance and engagement concerns
- Children Missing Education (CME)
- Disengagement from education, employment or training
- Risks associated with transition to adulthood
- Risks associated with care experience or social care involvement

Extremism and Radicalisation

- Radicalisation

- Extremism
- Terrorism-related concerns

Many of the individuals supported by Bespoke Mentoring experience multiple and interconnected vulnerabilities. Staff should therefore adopt a trauma-informed, contextually aware and professionally curious approach when assessing risk and identifying safeguarding concerns.

Safeguarding concerns may arise within families, peer groups, educational settings, workplaces, communities, online environments, transport arrangements or public spaces. Staff must remain alert to the cumulative impact of adversity, trauma and exploitation and take prompt action where concerns are identified.

Partnership Working

Effective safeguarding relies upon strong multi-agency collaboration.

Bespoke Mentoring will work closely with:

- Children's Social Care
- Adult Social Care
- Youth Justice and Youth Offending Services
- Education providers and commissioning schools
- Local Authorities
- Health services
- Police
- Supported accommodation providers
- Advocacy services
- Families, carers and support networks

to ensure continuity of support, effective information sharing and coordinated safeguarding responses, particularly during periods of transition between children's and adult services.

8. Safeguarding Risks Specific to Alternative Provision and Community-Based Delivery

Bespoke Mentoring recognises that children, young people and adults accessing Alternative Provision and community-based services may face additional safeguarding risks due to their individual circumstances, vulnerabilities and the environments in which support is delivered.

Many individuals accessing Bespoke Mentoring have experienced disrupted education, exclusion, social care involvement, trauma, exploitation, mental health difficulties,

neurodiversity, family instability or adverse childhood experiences, which may increase their vulnerability to harm.

Staff should remain alert to safeguarding risks associated with:

Vulnerability Factors

- School exclusion or suspension
- Persistent absence and poor engagement
- Social care involvement
- Care experience
- Mental health needs
- Neurodiversity and SEND
- Trauma and adverse childhood experiences
- Exploitation and criminality
- Substance misuse
- Homelessness or housing instability
- Social isolation
- Transition to adulthood

Community-Based Delivery

As Bespoke Mentoring delivers support in community settings, staff must consider risks associated with:

- Public spaces and community venues
- Unsupervised environments
- Contact with known associates
- Community tensions or gang influences
- Environmental and location-specific risks
- Online and offline peer influences
- Accessibility of support services

Lone Working

Staff may routinely work alone with children, young people and adults. Appropriate lone-working procedures, communication arrangements and risk assessments must be followed at all times.

Transporting Individuals

Staff routinely transport learners and service users as part of service delivery. Risk assessments must consider:

- Individual vulnerabilities
- Behavioural and emotional presentation
- Known safeguarding concerns
- Collection and drop-off arrangements
- Emergency procedures
- Vehicle and driver safety requirements

Absconding, Missing Episodes and Disengagement

Some individuals may be at increased risk of:

- Absconding from sessions
- Going missing during provision
- Disengaging from education, training or support
- Exploitation whilst absent from supervision

All missing episodes and significant disengagement concerns must be reported, recorded and reviewed in line with safeguarding procedures.

Contextual Safeguarding Risks

Staff must consider the wider contexts in which individuals live, learn and socialise, including:

- Peer groups
- Community influences
- Family circumstances
- Online environments
- Criminal exploitation risks
- Sexual exploitation risks
- Housing and accommodation concerns

Location-Specific Risks

Safeguarding risk assessments should consider whether particular locations may increase vulnerability due to:

- Previous incidents
- Community influences
- Emotional distress or trauma triggers
- Known associates
- Accessibility to unsafe environments

Where concerns are identified, consideration should be given to alternative venues, amended delivery arrangements, increased staffing levels or additional safeguarding measures.

Emotional Dysregulation and Environmental Triggers

Bespoke Mentoring recognises that certain environments, locations, individuals or situations may trigger emotional distress, trauma responses or dysregulation.

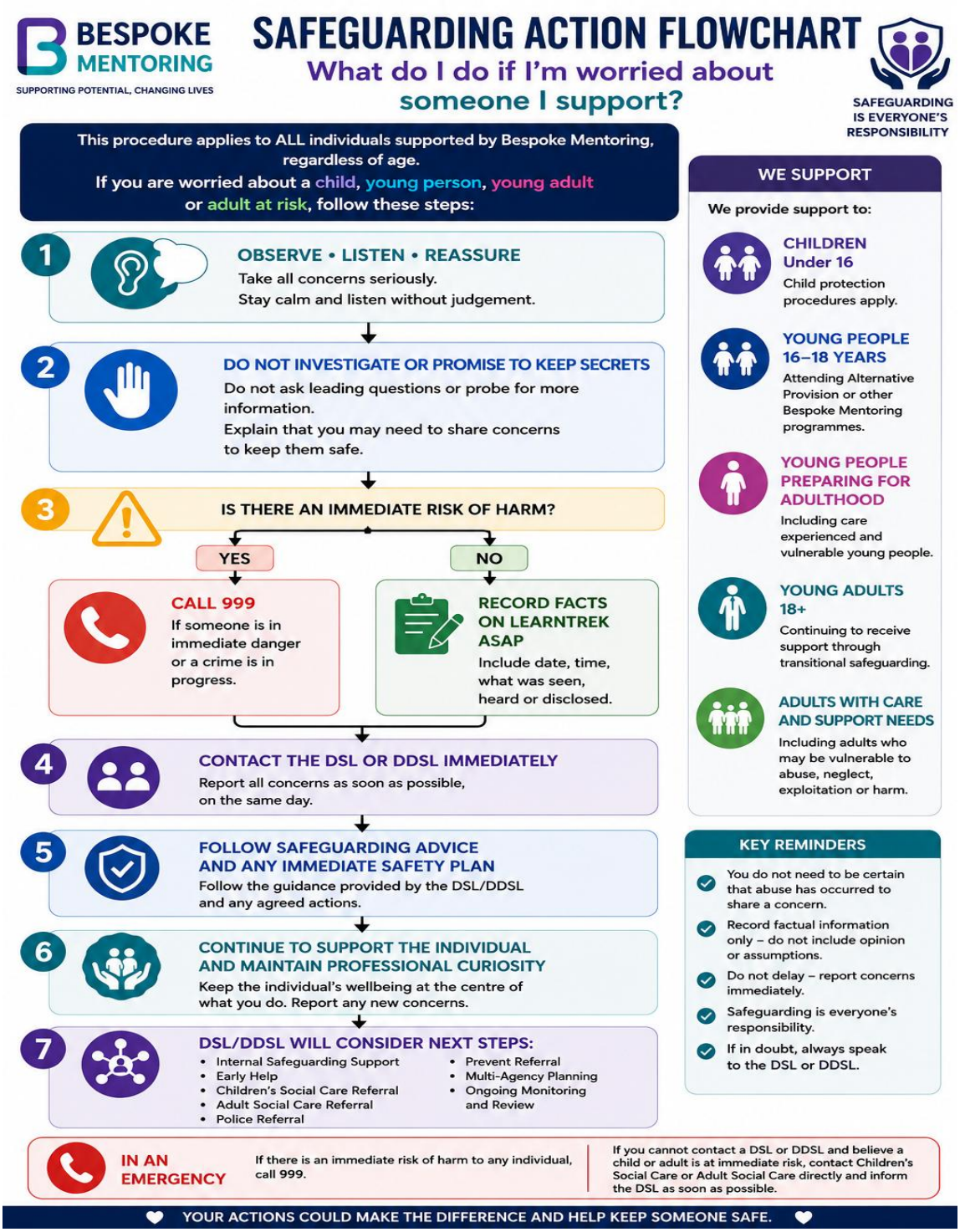
Staff should consider known triggers when planning provision and ensure risk assessments are reviewed regularly to minimise foreseeable risks and promote safe engagement.

Risk Assessment

Risk assessments must be dynamic, regularly reviewed and proportionate to the needs of the individual and the activity being undertaken.

Where safeguarding risks are identified, control measures must be clearly documented, communicated and monitored to ensure the safety and wellbeing of all individuals accessing Bespoke Mentoring services.

9. Reporting Concerns



10. Information Sharing

Working with Schools, Partner Agencies and Safeguarding Professionals

Bespoke Mentoring works closely with commissioning schools, Designated Teachers, social workers, local authorities, children's services, adult social care, health professionals, police, supported accommodation providers and other safeguarding partners.

The organisation recognises that effective safeguarding depends upon timely information sharing, professional curiosity and coordinated multi-agency working.

Safeguarding information will be shared appropriately and proportionately to ensure children, young people and adults receive the right support, at the right time, from the right services.

Information sharing will be guided by:

- Keeping Children Safe in Education (KCSIE)
- Working Together to Safeguard Children
- Care Act 2014 and Care and Support Statutory Guidance
- Information Sharing Advice for Practitioners
- Data Protection Act 2018
- UK GDPR

Information will be shared:

- Lawfully
- Proportionately
- Necessarily
- Securely
- Accurately
- Promptly

Where there are safeguarding concerns, the safety and welfare of the individual will take precedence. Concerns regarding confidentiality, consent or data protection must never prevent appropriate action being taken to protect a child, young person or adult from harm.

The organisation recognises that effective safeguarding relies upon collaborative working and will contribute fully to safeguarding enquiries, strategy meetings, multi-agency planning, child protection processes, adult safeguarding processes and other safeguarding arrangements as required.

11. Record Keeping

All safeguarding concerns, disclosures, incidents, actions and decisions must be recorded on LearnTrek using the appropriate safeguarding recording processes.

Accurate record keeping is essential to effective safeguarding and supports continuity of care, professional accountability and informed decision-making.

Safeguarding records must be:

- Accurate
- Factual
- Timely
- Clear
- Objective
- Person-centred
- Confidential
- Secure

Records should clearly distinguish between fact, professional observation and opinion.

Where appropriate, the voice, wishes and feelings of the child, young person or adult should be recorded and reflected within safeguarding records.

Records should include:

- Date and time of the concern
- Nature of the concern
- Observations, disclosures or incidents
- Actions taken
- Individuals informed
- Decisions made and rationale
- Outcomes and follow-up actions

All safeguarding records will be stored securely and managed in accordance with data protection legislation, organisational procedures and safeguarding requirements.

The Safeguarding Team will routinely review LearnTrek records to ensure safeguarding concerns are appropriately managed, monitored and escalated where necessary, and to identify emerging themes, trends, learning opportunities and areas for service improvement.

12. Safer Recruitment

Bespoke Mentoring is committed to safer recruitment and recognises that creating a safe culture begins with recruiting suitable people to work with children, young people and adults.

The organisation will ensure that all recruitment processes are fair, robust and comply with current legislation and statutory guidance. Appropriate pre-employment checks will be completed before any individual undertakes regulated activity or begins work with children, young people or adults at risk.

Safer recruitment checks include, where applicable:

- Enhanced Disclosure and Barring Service (DBS) checks, including children's and/or adults' barred list checks where required.
- Identity verification.
- Verification of the right to work in the UK.
- Employment history and explanation of any gaps.
- Professional and character references.
- Verification of relevant qualifications and professional registration where applicable.
- Health declaration where appropriate.
- Prohibition checks and other relevant regulatory checks where required for the role.

No individual will undertake regulated activity until all appropriate recruitment and safeguarding checks have been satisfactorily completed and authorised.

Bespoke Mentoring is committed to promoting a culture of vigilance, professional curiosity and safer working practices. All staff are expected to maintain appropriate professional boundaries, adhere to the Staff Code of Conduct and report any concerns regarding the suitability or conduct of adults working with children, young people or adults at risk.

The organisation will ensure that staff responsible for recruitment have received appropriate safer recruitment training and that recruitment practices are regularly reviewed to ensure compliance with current legislation and recognised best practice.

Where there is a legal duty to do so, Bespoke Mentoring will make referrals to the **Disclosure and Barring Service (DBS)**, the **Teaching Regulation Agency (TRA)** (where applicable), the **Local Authority Designated Officer (LADO)**, Social Care or other relevant regulatory or safeguarding agencies. The organisation will fully cooperate with statutory investigations

and safeguarding enquiries to ensure children, young people and adults are protected from harm.

13. Online Safety

Technology presents both opportunities and risks for children, young people and adults. Bespoke Mentoring recognises that online safety is an essential part of safeguarding and that many safeguarding concerns can occur through digital technologies, social media platforms, gaming environments, messaging services, online communities and emerging technologies.

Online risks may affect individuals of all ages and can occur both within and outside educational settings.

Staff should remain alert to concerns including:

- Online grooming
- Cyberbullying
- Sextortion
- Online exploitation
- Child sexual abuse material (CSAM)
- Deepfakes and manipulated content
- AI-generated abuse content
- Harmful online challenges
- Exposure to inappropriate or harmful content
- Online radicalisation and extremism
- Online harassment and hate incidents
- Fraud, coercion and online scams
- Financial exploitation
- Excessive or harmful use of technology
- Online relationships that present safeguarding concerns
- Sharing of indecent or inappropriate images
- Risks associated with online anonymity

Educating Learners and Service Users About Online Safety

Bespoke Mentoring is committed to helping children, young people and adults develop the knowledge, skills and confidence required to stay safe online.

Where appropriate to their age, understanding and individual needs, those accessing our services will be supported to:

- Recognise online risks and unsafe situations.
- Understand safe and responsible online behaviour.
- Protect personal information and digital identity.
- Recognise grooming, exploitation, coercion and manipulation.
- Understand the risks associated with sharing images, videos and personal information.
- Develop critical thinking skills when engaging with online content.
- Understand online consent, boundaries and respectful relationships.
- Use technology, social media and Artificial Intelligence (AI) safely and responsibly.
- Recognise misinformation, disinformation and manipulated content.
- Know how and where to seek help if they encounter concerns online.

Online safety education may be delivered through mentoring sessions, group work, targeted interventions, awareness campaigns, scenario-based learning, digital citizenship activities and other educational opportunities.

Artificial Intelligence (AI)

Bespoke Mentoring recognises the increasing use of Artificial Intelligence (AI) and the safeguarding opportunities and risks associated with its use.

Staff should remain alert to:

- AI-generated harmful or inappropriate content.
- Deepfake images, videos and audio recordings.
- AI-assisted grooming and exploitation.
- AI-generated misinformation and manipulated content.
- The misuse of AI tools to bully, harass or target others.
- The use of AI to create, alter or distribute inappropriate images.
- Risks associated with overreliance on AI-generated information.

Learners and service users will be supported to develop a safe, responsible and critical understanding of AI technologies and their appropriate use.

Virtual Private Networks (VPNs)

The use of Virtual Private Networks (VPNs) may present safeguarding concerns where they are used to:

- Circumvent organisational safeguards or filtering systems.

- Access age-inappropriate or harmful content.
- Conceal online activity.
- Access restricted websites, applications or platforms.
- Facilitate exploitation, grooming or other harmful behaviours.
- Avoid monitoring arrangements put in place to safeguard an individual.

Staff should remain professionally curious where VPN use forms part of wider safeguarding concerns and should consider the context, purpose and potential risks associated with its use.

Any concerns relating to VPN use should be discussed with the DSL or DDSL and recorded on LearnTrek where appropriate.

Reporting Online Safety Concerns

Any online safety concern that places a child, young person or adult at risk of harm must be treated as a safeguarding concern and responded to in accordance with this policy.

All concerns must be recorded on LearnTrek and referred to the DSL or DDSL without delay.

Bespoke Mentoring recognises that online safety is a safeguarding issue and is committed to promoting safe, responsible and positive use of technology across all areas of service delivery.

14. Training

Bespoke Mentoring is committed to ensuring that all staff receive high-quality safeguarding training and remain informed of current legislation, statutory guidance, emerging safeguarding risks and best practice.

All staff will receive safeguarding induction before working with children, young people or adults and will complete role-specific safeguarding training appropriate to their responsibilities.

Training will include:

- Child protection and adult safeguarding
- Transitional safeguarding
- Alternative Provision safeguarding
- Prevent and radicalisation
- Online safety, digital safeguarding and Artificial Intelligence (AI)
- Contextual safeguarding

- Trauma-informed practice
- Information sharing and record keeping
- Relevant statutory and non-statutory guidance
- Emerging safeguarding themes identified through national learning, local safeguarding partnerships or organisational practice

All staff are required to read and understand the relevant statutory guidance applicable to their role, including **Part One of Keeping Children Safe in Education (KCSIE)** and other safeguarding guidance identified by the Safeguarding Team.

The Safeguarding Team will provide safeguarding updates throughout the year in response to:

- Changes in legislation and statutory guidance
- Emerging safeguarding risks and national learning
- Safeguarding Practice Reviews and local learning reviews
- Changes to organisational procedures
- Audit findings and quality assurance activities
- Lessons learned from safeguarding incidents and practice

To support understanding and application of safeguarding practice, training may include quizzes, knowledge checks, case studies, scenario-based learning, reflective discussions, team briefings and safeguarding workshops. These approaches help ensure safeguarding knowledge remains current, embedded in practice and consistently applied across the organisation.

Bespoke Mentoring maintains comprehensive records of safeguarding induction, training, attendance, safeguarding updates, knowledge checks, competency assessments and staff declarations to evidence compliance, professional development and organisational assurance.

The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs) will undertake advanced safeguarding training at least every two years and will update their knowledge and skills regularly in line with current legislation, statutory guidance and recognised best practice.

15. Monitoring and Review

Bespoke Mentoring is committed to maintaining a culture of continuous improvement, accountability and excellence in safeguarding practice.

The Safeguarding Team is responsible for monitoring the effectiveness of safeguarding arrangements across the organisation and providing assurance that safeguarding responsibilities are being effectively discharged.

Monitoring activities include:

- Safeguarding audits and quality assurance reviews.
- LearnTrek quality assurance and case file audits.
- Review of safeguarding referrals, incidents and outcomes.
- Training compliance, competency assessments and safeguarding updates.
- Incident, near-miss and lessons learned reviews.
- Review of safeguarding trends, themes and emerging risks.
- Policy and procedural compliance monitoring.
- Feedback from learners, families, staff and partner agencies.
- Review of risk assessments and safeguarding practices across Alternative Provision and community-based delivery.

Learning arising from safeguarding incidents, audits, inspections, complaints, Safeguarding Practice Reviews, Adult Safeguarding Reviews and organisational learning will be used to strengthen practice, improve service delivery and promote positive outcomes for children, young people and adults accessing Bespoke Mentoring services.

This policy will be reviewed annually or sooner following:

- Changes to legislation or regulation.
- Updates to statutory or non-statutory guidance.
- Safeguarding incidents or significant events.
- Inspection findings or commissioner recommendations.
- Learning from safeguarding reviews or audits.
- Organisational change or service development.

The Director of Safeguarding is responsible for ensuring this policy remains current, reflects best practice and is communicated to all staff.

16. **Related Policies, Procedures and Guidance**

This policy should be read alongside other Bespoke Mentoring policies, procedures and guidance, including:

- Staff Code of Conduct - (included in the Staff Handbook)
- Behaviour Support Policy
- Lone Working Policy

- Online Safety and Acceptable Use Policy
- LearnTrek Recording Guidance – (included in the Mentoring Handbook)
- Whistleblowing Policy
- Complaints Policy
- Health and Safety Policy
- Safer Recruitment Policy
- Information Sharing and Confidentiality Policy
- Data Protection and UK GDPR Policy
- Equality, Diversity and Inclusion Policy

These policies and procedures should be read together to ensure a consistent, lawful and effective approach to safeguarding children, young people and adults across all areas of Bespoke Mentoring's service delivery.

17. Allegations Against Staff and Low-Level Concerns

Bespoke Mentoring recognises its responsibility to safeguard children, young people and adults at risk and to respond appropriately where concerns are raised regarding the conduct of anyone working on behalf of the organisation.

Any allegation, concern or complaint that a member of staff, volunteer, contractor, agency worker, student or other adult working with individuals has:

- Behaved in a way that has harmed, or may have harmed, a child, young person or adult at risk;
- Possibly committed a criminal offence against, or related to, a child, young person or adult at risk;
- Behaved towards a child, young person or adult in a way that indicates they may pose a risk of harm;
- Behaved in a way that may indicate they are unsuitable to work with children or adults at risk; or
- Failed to maintain appropriate professional boundaries or safer working practices,

must be reported immediately to the Designated Safeguarding Lead (DSL) and the Head of Service.

Where concerns relate to the Designated Safeguarding Lead, they must be reported directly to the Managing Director without delay.

Where allegations or concerns are raised about a person working with children, young people or adults at risk, Bespoke Mentoring will follow the relevant local authority safeguarding procedures. This may include consultation with the Local Authority

Designated Officer (LADO) in England or the appropriate Designated Officer for Safeguarding, Single Point of Contact (SPOC) or equivalent safeguarding lead in Wales, together with Children's Social Care, Adult Social Care, the Police and other relevant agencies, as appropriate.

Low-Level Concerns

Bespoke Mentoring encourages an open and transparent safeguarding culture in which staff feel confident to raise concerns about professional conduct at the earliest opportunity.

Low-level concerns may include behaviours that are inconsistent with the Staff Code of Conduct, professional boundaries or safer working practices, even where they do not meet the threshold for a formal allegation.

All low-level concerns will be:

- Reported promptly.
- Recorded appropriately.
- Reviewed by senior leaders.
- Managed proportionately.
- Used to identify patterns, themes or emerging risks.
- Addressed through supervision, support, training or formal procedures where appropriate.

Prompt reporting and effective management of low-level concerns helps maintain a strong safeguarding culture, promotes professional accountability and protects both those accessing our services and those working on behalf of Bespoke Mentoring.

18. Whistleblowing

Bespoke Mentoring is committed to maintaining an open, honest and transparent safeguarding culture in which all staff feel confident to raise concerns about poor practice, unsafe behaviour or conduct that may place a child, young person or adult at risk of harm.

All staff have a professional responsibility to report concerns where they believe that:

- Safeguarding practice is unsafe or ineffective.
- A child, young person or adult may be at risk of harm.
- Professional boundaries or the Staff Code of Conduct have been breached.
- Safeguarding procedures are not being followed.
- Decisions or actions place individuals at unnecessary risk.
- There are concerns about the conduct or practice of colleagues, managers or leaders.

- There is a culture or practice within the organisation that could compromise safeguarding.

Concerns should be raised promptly through the organisation's Whistleblowing Policy or other appropriate safeguarding procedures.

All concerns will be taken seriously, managed sensitively and investigated appropriately.

No member of staff will suffer detriment, discrimination or victimisation for raising a genuine concern in good faith. Bespoke Mentoring is committed to ensuring that those who raise safeguarding concerns are listened to, supported and protected throughout the process.

Where appropriate, concerns may also be referred to external safeguarding agencies or regulatory bodies in accordance with statutory guidance and organisational procedures.

19. Attendance, Engagement and Missing from Education or Provision

Bespoke Mentoring recognises that poor attendance, disengagement from education, training or support, and Children Missing Education (CME) may be indicators of abuse, neglect, exploitation, mental ill-health or other safeguarding concerns.

We also recognise that unexplained absence or disengagement by young adults and adults receiving support may indicate increased vulnerability, self-neglect, exploitation, deteriorating wellbeing or other safeguarding risks.

Where an individual fails to attend, disengages from provision or cannot be located during a planned session, staff will follow organisational safeguarding procedures, complete appropriate welfare checks where safe to do so and notify the commissioning school, referrer or relevant professionals as appropriate.

Repeated absence, missing episodes or unexplained disengagement will be treated as potential safeguarding concerns, recorded on LearnTrek and reviewed by the Safeguarding Team to determine whether additional safeguarding action, multi-agency intervention or review of the individual's risk assessment is required.

Where concerns relate to a child or young person of compulsory school age, Bespoke Mentoring will work in partnership with the commissioning school and relevant agencies in line with statutory guidance relating to school attendance and Children Missing Education.

For young people aged 16–18 and adults receiving support, staff will adopt a transitional safeguarding approach, recognising that disengagement from education, employment, training or support services may increase vulnerability and require coordinated multi-agency intervention.

Bespoke Mentoring is committed to promoting regular attendance, positive engagement and early intervention to reduce safeguarding risks and improve outcomes for all individuals accessing our services.

20. Conclusion

At Bespoke Mentoring, safeguarding is more than a statutory duty—it is the foundation of everything we do. Guided by our core values of **Support, Love and Guidance**, we are committed to creating a culture in which children, young people and adults feel safe, valued, respected and empowered to achieve their full potential.

We recognise that effective safeguarding is built upon positive relationships, professional curiosity, early intervention, partnership working and a commitment to listening to the voice, wishes and feelings of every individual we support. Through child-centred and person-centred practice, trauma-informed approaches and transitional safeguarding, we strive to ensure that everyone accessing our services receives the right support, at the right time, from the right people.

Safeguarding is everyone's responsibility. Every member of staff has a duty to remain vigilant, act with integrity, challenge poor practice where necessary and respond promptly to any concern, regardless of how small it may appear. Together, we are committed to fostering an open, accountable and reflective safeguarding culture in which continuous learning, professional development and collaboration with families, carers and partner agencies drive improved outcomes.

Through strong safeguarding leadership, robust procedures, effective multi-agency working and our unwavering commitment to **Support, Love and Guidance**, Bespoke Mentoring will continue to protect, support and empower children, young people and adults, ensuring they have every opportunity to live safely, develop resilience and thrive.