26/ 27 Safeguarding and child protection policy and procedures introduction.

Envision believes that in all matters concerning Child Protection, the welfare and interests of children and young people we work with are paramount in all circumstances.

Envision is a registered charity number 1095328 based at:
Canopi Borough, 7-14 Great Dover Street, London, SE1 4YR.

Envision is managed by a board of trustees.

The safeguarding team is as follows:

Role	Name	Contact
Chair of the Board	Tim Shanagher	Tim.shanagher@gmail.com
Safeguarding Trustee	Simone Caines- Powell	Simone.caines@aol.co.uk 07792 064888
Safeguarding Trustee	Danny Richards	Dannysrichards@hotmail.com 07947 738363
CEO	George Kearney-Bambridge	George.kb@envision.org.uk 07875 943993
Designated Safeguarding Lead	Jo Clark	jo.clark@envision.org.uk 07983 332 720
Deputy DSL/Bristol Lead	Sarah Brown	Sarah.brown@envision.org.uk 07522 076039

Deputy DSL/ Bristol Lead	Jessica Batty	Jessica.Batty@envision.org.uk 07592 023737
Birmingham Lead	Kathleen Nelson	kathleen.nelson@envision.org.uk
London Lead	Laila Bevan	Laila.bevan@envision.org.uk 07831 762 411

The CEO, Designated Safeguarding Lead, and Deputy DSLs can all be contacted via safeguarding@envision.org.uk

The Board has adopted this Safeguarding and Child Protection Policy and expects every adult working or volunteering at Envision to support and comply with it. This policy applies to anyone working on behalf of Envision, including senior management team and the board of trustees, paid staff, and volunteers, agency staff and interns, and students.

Failure to adhere to this policy will be treated as a serious matter. In the case of staff this may result in disciplinary action for gross misconduct. In the case of non-contracted staff (e.g. volunteers or trustees,) this may mean that we ask you to cease being a volunteer or trustee.

Purpose of the policy

The purpose of this policy is to:

- protect children and young people who participate in Envision's programmes, Youth Board, Workshops, and/or other events from maltreatment;
- provide our staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.

This policy works in conjunction with the following policies and documents to ensure the safety and well-being of all children and young people on our programmes:

- Code of conduct
- Safer recruitment
- Whistleblowing
- Data protection and privacy
- Ex-Offenders

Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England including:

Keeping Children Safe in Education 2026

Working Together to Safeguard Children 2026

Providing Remote Education: Guidance for Schools 2023

Ofsted Safeguarding Policy 2025,

What to do if you're worried a child is being abused 2015.

Updates for 2026

This policy was reviewed in Sept 2026 as part of our annual review process and to reflect the changes within Keeping Children Safe in Education 2026. The relevant changes to this policy are set out below.

Section	Page number	Change made
Throughout document	N/A	Updated language to replace Indecent Images to 'nudes or semi nudes'
Throughout document	N/A	Updated language to Child-on-child abuse including harassment and violence
Section 1: Protecting children and young people against abuse, neglect and exploitation		
	10	Updated to expand definition of abuse
	11	Added additional sentence about child to parent or care giver abuse.
	11	Clarified that emotional abuse may include verbal abuse
	12	Expanded section on sexual abuse to provide clear examples of physical contact
	13	Clarified that safeguarding issues often overlap
	14	Expanded examples of additional risk factors
	15	Added paragraph on school absences to highlight importance
	16	Added paragraph on mental health due to increased concerns connected to mental health in schools.

	17	Expanded Child on child abuse content to emphasise that: it is a safeguarding issue for both the victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.
	18	Updated examples of child-on-child abuse to include serious physical harm and threats involving weapons
	18	Updated example of sexual violence and added 'consensual sharing of nudes or semi nudes.
Section 2: Creating a safer organisation		
No updates		
Section 3: Reporting and referrals of concerns, disclosures and incidents		
	35	Updated to clarify how we record allegations for volunteers, trustees and school staff
	39	Added additional LADDO numbers for new Local Authorities we now work with
Section 4: Keeping children and young people safe outside school		
	41	Added statement re following school trip processes
Section 5: Photography and media consent		
	42	Added new procedure for mentors or other guests to wear green lanyard at all events
	43	Added sentence to highlight increased risks of AI

	45	Updated section on 'Limiting the potential misuse of images and video' to clarify who can take photos and how they should be transferred from phone to SharePoint.
	45	Updated to clarify we no longer post photos of young people's faces on social media.
Section 6: Communicating with children and young people		
No updates		
Section 7 Online safety of young people		
	55	Updated definitions of online abuse (content, contact, conduct, commerce)
Section 8: Child protection record retention		
No updates		
Section 9: Monitoring and review of policies		
No updates		
Section 10: Appendices		
Appendix A	60	Updated entire section to reflect substantial changes.
Appendix C	69	Updated entire section to reflect substantial changes
Appendix D	73	Added additional reference points
Appendix E	79	Added new section on domestic violence
Appendix F	81	Added new section on serious violence
Appendix G	82	Updated section on Filtering and monitoring

Appendix H	84	Updated Ofsted definition of safeguarding

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1. Protecting children and young people against abuse, neglect and exploitation

This policy recognises that the welfare and interests of children and young people we work with are paramount in all circumstances. It aims to ensure that regardless of age, ability or disability, gender, race, religion or belief, sex or sexual orientation, socio-economic background, that all children and young people:

- have a positive and enjoyable experience working with Envision in a safe and child centered environment
- are protected from abuse whilst participating in our programmes, workshops or any of our online or in-person events.

As well as our own policy, we adhere to all safeguarding policies, procedures, and regulations set out by our school partners to ensure the wellbeing of their pupils and staff.

a. Forms of abuse, neglect, and exploitation

Abuse is defined by the NSPCC and the Keeping Children Safe in Education 2025 document as: a form of maltreatment of a child or young person. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the witnessing ill treatment of others. This can be particularly relevant, for example in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children and young people may be abused in a family or an institution or a 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. (e.g. via the internet). They may be abused by an adult or adults, or other children or young people. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Types of abuse

- **Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to 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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- **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 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.

- **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 penetration with an object) 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 in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

- **Online abuse:** any type of abuse that happens on the internet, whether through social networks, playing online games or using mobile phones. From 2025 this includes exposure to misinformation, (false or inaccurate information especially that which is deliberately intended to deceive) disinformation (intentional creation of false or manipulated information to deceive and mislead people)

and conspiracy theories Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.

- **Child trafficking:** where children and young people are tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold for a number of reasons.

- **Criminal exploitation:** child abuse where children and young people are manipulated and coerced into committing crimes. Please see Appendix C for further information.

- **Female genital mutilation:** also known as FGM, this is when a female's genitals are deliberately altered or removed for non-medical reasons. It's also known as 'female circumcision' or 'cutting' but has many other names.

- **Domestic abuse:** any type of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and young people and witnessing domestic abuse is child abuse.

Recognising signs of abuse, neglect or exploitation

Some children may be more vulnerable to abuse, neglect, or exploitation. All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below).

The following behaviours and indicators can be signs that children are at risk:

All staff should be alert to the possible vulnerability of a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

It is important that all staff and volunteers working with children and young people can recognise signs of neglect or abuse. A detailed list of signs of abuse, neglect and exploitation can be found in Appendix B of this policy and make up part of the mandatory Safeguarding Training for all staff.

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour or faith-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

If you recognise any signs or are concerned about the well-being of a child or young person, you must inform the Designated Safeguarding Lead immediately.

Remember:

- A young person is never to blame for abuse.
- Disabled young people are more vulnerable to abuse.
- Young people very seldom make false accusations that they have been abused.

- Young people who talk about abuse often fear the consequences of telling other people and whether it will get worse.
- Young people who are abused can be very good at hiding their unhappiness or distress.
- Abuse can have serious long-term effects on young people

Mental health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also 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. Education staff, however, 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. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include: significant changes in behaviour, ongoing difficulty sleeping, withdrawing from social situations, not wanting to do things they usually like, and physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. If staff have a concern about a child's mental health that is also a

safeguarding concern, they should follow their child protection policy and speak to their designated safeguarding lead or deputy. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

b. Child-on-child abuse including harassment and violence

All staff should be aware that children can abuse other children (sometimes referred to as peer-on-peer abuse). It can happen both inside and outside of school/college 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.

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

All staff should know that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, staff should know that timely, evidence-based support can be key to preventing children from going on to commit abuse.

All staff should be clear as to the school or college's policy and procedures with regards to child-on-child abuse. 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 which can include hitting, kicking, shaking, biting, hair pulling,
- serious physical harm, threats involving weapons or otherwise causing physical harm;
- 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.

Child-on-child abuse may also take the form of sexual violence or sexual harassment. This may include, but is not limited to:

- sexism, including making comments based on sexist stereotypes
- grabbing of body parts, such as buttocks, genitalia, or breasts;
- pulling down trousers, flicking of bra straps, or lifting up skirts;
- 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;
- consensual or non-consensual sharing of nude and semi-nude images and/or videos;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.

Sexual violence and sexual harassment can occur between two children of any age and sex. Sexual violence and harassment exist on a continuum and may overlap: they can occur online and face-to-face (both physically and verbally) and are never acceptable.

Addressing inappropriate behaviour

Addressing inappropriate behaviour – even if it appears to be relatively innocuous – can be an important intervention that helps prevent problematic, abusive, and/or violent behaviour in the future.

It is important that staff make clear that there is a zero-tolerance approach to child-on-child abuse, violence, or harassment and that it is never acceptable and will not be tolerated.

Child-on-child abuse must never be passed off as 'banter', 'just having a laugh', 'part of growing up', or 'boys being boys'. It is important to understand that all of the above can be driven by wider societal factors beyond the school or college, such as everyday sexist stereotypes and everyday sexist language, and all must be challenged.

It is also important to note that the taking and/or sharing of consensual and non-consensual sharing of nude and semi-nude images and/or videos of under 18s is a criminal offence, as set out in the UKCIS.

Further information can be found in Appendix A.

2. Creating a safer organisation

Most paid staff and volunteers who work with children or young people are committed to their wellbeing and care. Nevertheless, there is a range of abuse perpetrated by workers, and tangible evidence that despite the best efforts and intentions of well-meaning organisations, professionals and volunteers, children or young people have been abused and, in rare cases, murdered in organisational settings.

There is no single characteristic or set of characteristics that identify someone as being unsuitable for working with children or young people, but there are several behaviours and attitudes that can be meaningfully assessed in the course of a multi-layered selection process. Vetting & barring unsuitable people, developing safer selection processes and value-based recruitment can help protect children and identify relevant traits or signs that indicate someone may be unsuitable to work either directly with children and families, or on their behalf.

a. Safer recruitment

The welfare and safety of children and young people we work with is paramount in our work at Envision. Our Safer Recruitment Policy outlines the robust safer recruitment practices and procedures we put in place to ensure we recruit staff and volunteers who are suitable to work with children.

b. Disclosure and Barring Services (DBS)

All paid staff, trustees, and internal volunteers at Envision are required to have an Enhanced DBS check. We do not require external volunteers to have an Enhanced DBS check as they do not carry out 'regulated activity' with our young people, and as such they are not left unsupervised with young people on our programme.

As an organisation working with young people, Envision has a legal duty to make a referral to the DBS in cases when an employer has dismissed or removed a person from working with children or vulnerable adults (or would or may have if the person had not left or resigned) because of concerns over their behaviour towards children or young people. The CEO and/or the Chair of Trustees will make this referral with advice and support from the DSL.

Further information on the vetting, disclosure and barring checks made by Envision can be found in the Safer Recruitment Policy.

c. Safeguarding training

Envision is committed to ensuring all our staff are appropriately trained to fulfil the needs of their role. Safeguarding training is designed to create a safer culture and is delivered during staff induction; it is then refreshed annually as part of whole staff training.

Paid staff, trustees. and internal volunteers are trained on the following:

- Understanding and following all safeguarding policies
- Spotting and responding appropriately to signs of child abuse
- Reporting and recording all safeguarding incidents, including allegations management and whistleblowing
- Key contacts for referrals and procedures for ongoing support

We have identified the following groups of staff/volunteers within Envision and the corresponding training that they require:

Envision staff/volunteers	Level of training	Training provider
Short-term volunteers, such as mentors and assistant coaches	Level 1	Training by Envision DSL and ongoing briefings by Envision Staff
Envision Delivery Staff and all Envision Staff and Trustees who may come into direct contact with YP at any Envision events	Level 2	Internal training by Envision DSL & signed document that completed or external training and certification
All SMT, Chair of the Board, Regional Leads in Safeguarding	Level 3 Safeguarding and/or Level 3 Safer Recruitment	External training and certification
Designated Safeguarding Lead, Designated Deputy Safeguarding Lead and Safeguarding Trustee (with Lead Safeguarding Responsibility)	Level 4 and Safer Recruitment	External training and certification
Chief Executive Officer, Safeguarding Trustee, and Chair of the Board	Managing allegations against staff	External training and certification

Equivalent levels of training should be delivered in all regions at Envision.

All staff must undergo refresher training on an annual basis, led by the Designated Safeguarding Lead. The Designated Safeguarding Lead is trained up to Level 4 and oversees designing and delivering Safeguarding Training for all paid staff and internal volunteers up to Level 2. This should refer to updates in regional and national priorities.

All staff should sign a declaration on an annual basis to confirm that they have received and understood the relevant training.

All Programme Coordinators must be trained in 'First Aid in the Workplace' so that they are a trained first aider for off-site visits e.g. Mentoring sessions.

Following Safeguarding Training, all staff and volunteers receive written guidance on how to follow the safeguarding regulations. This is updated in line with the policies.

External volunteers receive safeguarding briefings in advance of every event or session working with young people. As stated above, no adults without enhanced DBS checks are permitted to be left unsupervised with young people.

d. Disciplinary procedure

Any allegation that an Envision employee, other professional or volunteer has behaved in a way that has harmed, or may have harmed a child, must be taken seriously and dealt with sensitively and promptly. The child's or young person's interests are paramount, and their views and wishes must be given careful consideration at all times. The young person and staff member/ volunteer must also receive appropriate support, and the employee must be treated fairly and impartially.

If an allegation, disclosure or concern reported relates directly to a staff member or volunteer, the same initial process of reporting and recording must be followed as a disclosure. Full details and information on this procedure are outlined in Envision's Grievance Policy.

e. Whistleblowing

Envision has a separate Whistleblowing Policy that outlines what steps should be taken if anyone has concerns about various types of wrongdoing in the organisation.

If there are concerns that the organisation is failing to safeguard and promote the welfare of children and young people and it is not possible to raise these concerns within the organisation, staff and volunteers may report concerns to:

- the NSPCC whistleblowing helpline 0800 028 0285
- the Charity Commission - whistleblowing@charitycommission.gsi.gov.uk

3. Reporting and referrals for concerns, disclosures and incidents

Safeguarding is the responsibility of all staff and volunteers working at Envision. All staff are required to attend safeguarding training during their induction period and then annually, that outlines the procedures for referrals and reporting incidents. All staff and volunteers will receive guidance on reporting and making referrals.

Safeguarding concerns regarding children and young people are always urgent and should be reported immediately.

a. The 5Rs model

The 5R's of safeguarding are recognise, respond, report, record, and refer. These principles are important for ensuring the safety of children and young people in various situations:

- Recognise signs for safeguarding concerns or harm
- Respond appropriately following the process outlined in this section
- Report to both the Safeguarding Team at the school and Envision as soon as possible
- Record what you have seen, heard, or witnessed in written form using bullet point detail
- Refer your written record to the school and Envision Safeguarding Team who will then take the necessary next steps

b. Definitions of terminology

- **Concerns:** A safeguarding concern is a feeling or worry that a child or adult may be at risk of harm or abuse or may have been harmed or abused. Concerns may relate to something directly seen or heard or may relate to information which has come to the attention of staff through any other means. A concern is not yet confirmed or fact checked.

- **Disclosures:** A disclosure is the process of revealing information. Disclosure may be a process rather than a single or specific event. Disclosure about abuse can be directly or indirectly communicated, voluntarily or involuntarily. Disclosures may come from the young person(s) involved or from a friend or peer.

- **Incidents:** An incident is an act or series of acts of violence or abuse by one perpetrator or group of perpetrators. This may involve multiple types of violence (physical, sexual, emotional etc.); and may involve repetition of violence over a period of time.

- **Allegations:** An allegation is a claim or assertion that someone has done something illegal or wrong that has not yet been proven to be true. Allegations

require scrutiny, assessment, and evaluation to determine the accuracy or truth of the claim.

c. Definitions process for reporting safeguarding (child-on-child or external adults)

The following process is for concerns, disclosures, incidents, or allegations are being made either child-on-child or about an adult who is not a member of school or Envision staff or volunteers.

For process for reporting concerns, disclosures, incidents, or allegations against school or Envision staff or volunteers, please see **d. Managing allegations against staff and other professionals.**

The procedure for reporting and referrals depends on the type of safeguarding issue. Below is a table outlining who you must contact and when.

Safeguarding matter	Who to contact and when
If a young person is at risk of **immediate harm or danger**	The **police** or **medical professionals** by calling 999 immediately
A **concern, disclosure** or **incident** of abuse or neglect involving another young person **(child-on-child)** or an **adult who is not a member of school or Envision staff or volunteer**	If onsite, the **school DSL** before leaving the school premises. If offsite, the **accompanying teacher** immediately and the **school DSL** asap. The **Envision DSL** or **Deputy DSL** as soon as possible following the incident, having created a report as per Envision's Safeguarding procedures.
Concerns where a young person has not directly disclosed or an incident has not occurred, but further investigation may	If onsite, the school DSL before leaving the school premises.

be required (e.g. overheard conversations between young people or staff; witnessed concerning behaviour that may pose a risk to the well-being or safety of young people in the future)	• If offsite, the accompanying teacher • immediately and the school DSL asap. • The Envision DSL or Deputy DSL as soon as possible following the incident, having created a report as per Envision's Safeguarding procedures. • The Regional Lead to inform them that a report has been made and to discuss any partnership concerns or for pastoral support.
Low-level concerns where the concerns do not meet the harms threshold but still cause a sense of unease or a 'nagging doubt' (e.g. behaviour, language, or discussions that feel overly friendly or over familiar, or are bordering on the inappropriate or related to issues or topics that are inappropriate or potentially harmful)	• The Link Teacher and/or school DSL - depending on who is involved –before leaving the school premises or as soon as possible. • The Regional Lead as soon as possible, who may refer you to the Envision DSL or Deputy DSL depending on the report outline.

i. If a child or young person is at risk of immediate harm

In the rare case that a child or young person is at risk of immediate harm, the first priority must always be to remove the child or young person from danger. If you believe the child or young person is in immediate danger or in need of medical or professional assistance, then you must call 999. You will need to disclose the alleged abuse or threat to the police or medical professionals to ensure that the matter is handled appropriately and sensitively, and that any evidence is preserved. You must then report the incident to the DSL using the reporting procedures.

ii. Responding to a disclosure

It is important to understand that children and young people may not find it easy to tell staff about abuse, neglect or harm. The initial response to a report from a child or young person is incredibly important. How we respond to a report can encourage or undermine the confidence they have in sharing with adults.

If a child or a young person chooses to disclose an incident of abuse, neglect, or other safeguarding concern with you, **you must:**

- Reassure the child or young person that they have done the right thing by telling you.
- As soon as is appropriate, explain that the information they are sharing will be shared with other appropriate adults within Envision and their school. **You must never promise to keep what they have said a secret.**
- If the child or young person decides not to share with you based on this, you must report this immediately to the school and Envision DSLs following the reporting processes.
- If the child or young person continues to disclose, listen carefully and remain calm. Do not interrupt and try not to show your emotions to the child or young person but allow them to feel safe and comfortable to talk to you.
- Make sure you understand and are clear on what the child or young person is telling you. You must avoid asking leading questions, just clarifying questions. You should ask them to repeat any information you are not clear about, avoiding rephrasing what they have said or putting things into your own words for them.
- At the earliest opportunity, make careful, brief but direct notes of the main points of what has been said by the child or young person, ensuring the exact words of the child or young person are noted in quotation marks. Where exact words cannot be remembered, make sure bullet points are made of the detail as clearly as can be remembered, avoiding rephrasing or paraphrasing what was said.

- **Inform the school DSL immediately** and the Envision DSL as soon as possible, transferring your notes into the appropriate format required by the school/college and Envision.

Disclosures often come in the form of conversations that cause a concern to the adult, rather than the child or young person explicitly asking to share a disclosure. If this is the case, as soon as possible you must make detailed notes on what was shared by the child or young person and share with the school DSL immediately and Envision DSL as soon as possible.

Disclosures of historical abuse should be treated in the same way as disclosures of current abuse, particularly where there may still be a risk to children and young people or vulnerable adults.

All disclosures made on the school premises must be reported to the school's Designated Safeguarding Lead or another appropriate member of staff, such as the Link Teacher, before leaving the premises. If offsite, the school member of staff who is accompanying the child or young person must be informed immediately, and the school DSL must be informed as soon as possible. In both circumstances, Envision's DSL or Deputy DSL should be contacted as soon as possible after the event to notify them that a disclosure was made, and the appropriate school staff have been informed.

This must then be followed up with further detail via the completion of a Salesforce Safeguarding Report, which is kept in a confidential and secured area on the system. An example of the report can be found in the Appendix I.

iii. Reporting and referring a concern, disclosure or incident

If an incident has been witnessed or directly disclosed, or if you have any concerns about a child or young person's welfare or safety, it is vital all relevant details are recorded as soon as possible and in as accurate detail as possible.

When reporting to the school DSL or safeguarding team, Envision staff must follow the internal process and procedure used by the school.

To report a concern, disclosure, or incident internally with Envision the following steps must be followed:

1) Transfer detailed notes to the Envision Salesforce Safeguarding Report which is held in a confidential and secure area on Salesforce. The report must include:

   - The date, time, place and context in which the matter took place
   - Bullet point detail in clear, chronological order
   - Where possible, the exact words used by the young person/people in quotation marks
   - The behaviour, manner, or demeanour of the young person/people when the matter occurred
   - Any questions you asked of them and their response
   - Details of any important steps that have been taken prior to completing the report (e.g., informing the school DSL)

2) Once complete, notify the Envision DSL and Deputy DSL via the safeguarding email address with a direct link to the Safeguarding Report on Salesforce included in the email.

The Envision Safeguarding Team will take any necessary further steps. If any updates are necessary, these must be passed on immediately so that the Salesforce Safeguarding Report can be updated. This will be done via the 'Notes' section.

It is vital that once the report is made, the person making the referral keeps matters strictly confidential.

Under no circumstances should an alleged perpetrator be made aware of suspicions or allegations. The only exception is where you witness something happening and must directly intervene for the immediate safety or well-being of a child or young person.

All records will be saved securely on Salesforce, with access restricted to the reporting staff member, the Envision Safeguarding Team, and Salesforce Administrator (Director of Finance and Resources.) The Safeguarding Team will

monitor reports and maintain oversight of any young people, mentors, or organisations with multiple or frequent concerns.

iv. Following a report or referral to the Envision Safeguarding Team

Where necessary, the Envision Safeguarding Team will liaise with the school's DSL regarding reporting to the relevant local authority.

If the DSL (or Deputy) is not satisfied that the school has reported to the local authority, they will consult the policies of the relevant local authority and, in accordance with those policies, make a report to the Local Authority Designated Officer (LADO) without delay.

In exceptional circumstances where speaking to the school's DSL or Safeguarding Team could give rise to harm to a child or young person, the DSL (or Deputy) should not do so and should report directly to the relevant local authority without delay.

The DSL (or Deputy) will report to the CEO and/or Safeguarding Trustee as appropriate to enable prompt and appropriate reporting of any serious incidents.

The expectation is that the school is responsible for informing the child or young person's family or carer and when they will be informed, taking advice from the LADO.

Where there are concerns about radicalisation and extremism, the DSL (or Deputy) will notify the school immediately.

Where a crime has or may have been committed, or there are concerns about gang violence or child criminal exploitation, the DSL (or Deputy) will report it to the police in consultation with the school.

Further guidance on how and when to report can be found in the Charity Commission's Serious Incident Guidance.

d. Managing allegations against staff and other professionals

Any allegation that a member of Envision staff, volunteer, or other professional or adult has behaved in a way that has harmed, may have harmed a child, or has behaved in a way that suggest they are a risk or potentially not suitable to work with children, must be taken seriously and dealt with sensitively and promptly. The child's interests are paramount and their views and wishes must always be given careful consideration. The young person and staff member/ volunteer must also receive appropriate support, and the employee must be treated fairly and impartially.

As with all safeguarding incidents, if there is an immediate risk or harm to a child, appropriate actions may need to be taken such as urgent involvement of police, removal of the member of staff, securing evidence or urgent medical attention.

The following concerns about the conduct of a member of staff or other professional working or volunteering with children or young people must be treated as a serious safeguarding and child protection issue and reported immediately:

- A member of staff or volunteer has behaved in a way that has harmed a child, or may have harmed a child or young person, or;
- possibly committed a criminal offence against or related to a child or young person, or;
- behaved towards a child, children or young person in a way that indicates s/he may pose a risk of harm to them in the future;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In terms of the latter, allegations can also be applied as a result of the following:

- Has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include arrest for possession of a weapon.
- As a parent or carer, who has become subject to child protection procedures
- Is closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to a child/ren for whom the member of staff is responsible in their employment/volunteering.

Concerns about or allegations against other adults will fall into the following two categories:

- Concerns about or allegations against school staff, including school internal and external volunteers
- Concerns about or allegations against Envision employees, including internal and external volunteers

For these two categories, there are slightly different procedures that must be followed:

Safeguarding matter	Who to contact and when
Concerns about or allegations against school staff, including school volunteers	• The most senior member of staff at the school who is not implicated in the allegation immediately. This will most likely be the Headteacher/Principal. • Inform the Envision CEO and Envision DSL as soon as possible following the incident.
Concerns about or allegations against Envision employees, including Envision volunteers	The most senior member of staff at Envision who is not implicated in the allegation immediately. This will most likely be the CEO.

Further information on the above is as follows:

Concerns about or allegations against school staff or school volunteers	Additional or alternative steps for concerns about or allegation against an Envision employee or volunteers
Report your concerns to the most senior person at the school not implicated in the allegation – usually the Headteacher or Principal. Inform the Envision DSL and CEO and seek their advice if unsure about school situation.	**Report to the most senior person at Envision** not implicated in the allegation – usually the CEO. If the CEO is implicated, then the Safeguarding Trustee or the Chair. Staff should take all reasonable steps to observe confidentiality and must not to discuss the matter with other colleagues
Complete a written record (via email) of the nature and circumstances surrounding the concern, including any previous concerns. Include where the concern came from & brief details only. Sign and date the document. Return to the member of staff you initial reported to.	Staff should take all reasonable steps to observe strictest confidentiality of written reports within the organisation and should not send anything via organisational email but instead return in hand.
The most senior staff member who has received the report should seek advice from the LADO before proceeding. This advice should be sought within one working day, prior to investigating the allegation. It might meet the criminal	Further advice should be sought from Safeguarding Trustee/Chair as necessary. Following LADO advice and risk assessment, if the decision to suspend the staff member/ volunteer from duty with immediate effect is taken,

threshold and should become a police or social care investigation. The LADO will offer advice on any immediate action required and will assist with employment and safeguarding issues.	this should be communicated (usually by CEO) in writing within one working day. (NB. suspension is a neutral action and covers the period whilst an investigation is carried out.)
Follow the allegations management process if, after the initial discussion with the LADO, it is agreed that the allegation meets the harm criteria. A multi-agency meeting will be convened to which the most senior member of staff will be invited. This might result in a criminal investigation, a Social Care investigation and/or an investigation to inform whether disciplinary action is required. If it is agreed that the allegation does not meet the criteria, the LADO will record the initial discussion and send it to relevant party/ organisation for their records. Any further action will then be decided internally.	The CEO and/or Safeguarding Trustee and Chair should determine who shall carry out any internal investigation. Investigations should usually take place in a timely manner, and efforts must be made to complete it within 10 working days of the initial allegation. They must ensure that the person who is the subject of the allegation is kept informed of the progress of the case and arrange to provide appropriate support while the case is on-going
Further action	
Further meetings might be required & these will be convened by the LADO with school/ organisation representatives input at all times. Further information on the Allegations Management Process	The CEO and/or Safeguarding Trustee and Chair will ensure that the person who is the subject of the allegation is kept informed of the progress of the case and arrange to provide

can be found in the government document: Working Together to Safeguard Children.	appropriate support while the case is on-going.

Complaints and allegations against internal members of staff should always be viewed objectively. The circumstances around the allegation can be complicated and the outcome far from certain.

i. Definitions when determining outcomes of an allegation

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Children and young people may make false allegations in an attempt to draw attention to abuse emanating from another source within their family or community. This is known as displacement. A colleague may make a false allegation in an attempt to discredit a member of staff. The perception that an allegation is false should not prevent a child protection referral being made. At all times a full investigation should take place.

ii. Supporting employees

Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact within Envision if they are suspended.

It is essential that any allegation is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

When to inform the individual accused should be considered on a case-by-case basis and guided by the LADO and relevant agencies. If LADO decides to convene a Discussion Meeting, (sometimes called an "Allegations against staff and volunteers meeting/discussion") or police or children's social care need to be involved, the CEO and Safeguarding Trustee should consult and agree what information can be disclosed.

Further information for managing allegations can be found in Keeping Children Safe in Education 2025.

e. Local Authority Designated Officer (LADO) for each region

Statutory guidance and procedures state that every Council has a duty to manage allegations and concerns about any person who works with children and young people in their area. This includes Council staff, staff or partner agencies and volunteers.

The LADO is responsible for managing all child protection allegations made against staff and volunteers who work with children and young people in their area.

Below is a list of the contact details for each LADO for the regions in which we have provision.

Region	Daytime	Out of hours
Bristol		
Bristol LADO	0117 903 6444	01454 615 165
West Midlands		
Birmingham LADO	0121 675 1669	0121 675 4806 0121 303 1888
Sandwell LADO	0121 569 3100	0121 569 3100
Walsall LADO/ MASH	0300 555 2866	0300 555 2922
Solihull	0121 788 4300/ 07795 128638	0121 6056060
London		
Enfield	020 8379 5555	020 8379 1000
Hounslow	0208 583 5730	0208 583 2222
Hackney	0208 356 4569	0208 583 2710
Waltham Forest	020 8496 2310	020 8496 3000
Lambeth	020 7926 5555 (24 hours)	
Southwark	020 7525 1921	020 7525 5000
Lewisham	020 8314 6660	020 8314 6000
Bexley	020 3045 5440	020 8303 7171
Tower Hamlets	020 7364 5601	0207 364 4079
Westminster	0207 641 7 668	0207 641 2388

When a safeguarding issue is reported, the CEO and Designated Safeguarding Officer may refer this on to the LADO, dependent on the severity of the incident. The CEO and Designated Safeguarding Officer may also seek advice from LADO in cases where the threshold of harm is not clear on a no-names basis. Staff involved in the incident may be asked to provide an additional statement directly to the LADO.

Other useful contacts:

- NSPCC 24-hour Helpline: 0800 800 5000 (free from a landline)
- NSPCC Asian Languages Helpline: 0808 800 5000 (free from a landline)
- NSPCC Text Helpline: 88858 (service is free and anonymous)
- Police: 101 (non-emergency calls)

4. Keeping children and young people safe outside of school

a. Risk assessments

For all Envision sessions that take place outside of school, including events, a risk assessment must be completed.

Templates, covering all risks and steps taken to mitigate them, will be developed and signed off by the Safeguarding Team. These will include information on any medical, dietary requirements or allergies as well as adjustments needed. Personalised risk assessments for each school's mentoring sessions, as well as cross-school events, must then be completed by a Programme Coordinator and signed off by the Delivery Manager or Regional Manager.

Risk assessments should be shared with the relevant school in good time before trips. Adjustment information should use YP initials only for mentor session risk assessments. This information should be completely anonymised for cross-school events as these will be sent to multiple schools.

For any event venue that has specific additional risks not covered by the template, the Regional Manager must update the risk assessment and flag any changes to the Safeguarding Team for approval. Staff should also ensure risk assessments align with school trip policies.

b. Mentoring sessions in the workplace

At mentoring sessions in the workplace, young people must always be accompanied by a DBS checked member of Envision staff, or a Link Teacher or other member of school staff. They must not walk around an office building or space with, or be left

alone in a room with, adult volunteers or guests without a member of DBS checked staff present.

c. Cross-school events

To ensure young people are safe at cross-school events, the following guidance must be followed:

- Staff must ensure that registers of all young people and adult guests are completed and shared with the contact at the venue in advance of the event.
- Staff must register all guests upon arrival and only allow entry to those on registers or with sufficient school ID.
- Registers for young people must contain information regarding media consent (see section 5. Photography and Media of Young People), and yellow lanyards must be given to all young people without media consent and must to be worn at all times during events.
- Staff must ensure they are wearing attire that makes them easily recognisable as a member of Envision staff. This should include either an Envision T-shirt and/or an Envision lanyard.
- At least one member of First Aid Trained staff should be in attendance at each event. This member of staff should be identified at the beginning of the event for all attendees.
- Staff must remind all attendees at the start of, and at points throughout, the event, that no photography or filming is allowed at events, except for by members of Envision staff, school staff (of their own young people only), or by professional photographers or videographers (see section 5. Photography and Media of Young People).
- All mentors and guests should wear a green lanyard for the duration of the event.

5. Photography and media

a. Risks of photographing or filming young people

Parents and young people generally welcome opportunities to celebrate or publicise their involvement and achievements when taking part in our programmes and at events, however, there are risks involved in photographing or taking videos of young people. These risks include:

Young people being identified, contacted, or groomed

- Including a young person's personal information (full name, school, address, email address) alongside their image can make them identifiable and therefore vulnerable to individuals looking to locate, contact or 'groom' children for abuse.

There is increased risk of identification of, and contact with, a child:

- by someone in circumstances where there are legal restrictions – such as if the young person is in local-authority care or placed with an adoptive family.
- where it's potentially dangerous to reveal the young person's whereabouts to an estranged parent due to previous concerns about domestic violence.

Someone might make inappropriate or illegal images of that young person. This is an increasing risk in the light of AI developments such as AI scraping.

- photo or video content may itself be inappropriate, or images may be used inappropriately or out of context.
- photos taken at ground level may result in 'upskirting' images, which in themselves are illegal.

- images can easily be copied and edited, including to create child-abuse images.
- images shared privately online can be re-shared, possibly entering the public domain on websites or social media.

b. Photography, filming and media consent

To reduce risk to young people when photographing or filming during our programmes, young people must return a parental consent form (Secondary) or media consent form (Post-16) in advance of the programme launching, to indicate that they agree to their image being used by Envision.

Envision's standard parental and media consent forms state that any images and media of young people will only be used for the following purposes:

- On Envision's website as part of marketing, communications, and publicity of our programmes;
- For Envision's marketing materials, such as printed brochures and leaflets to advertise our programmes and Impact Reports shared with schools and funders;
- On Envision's social media platforms, such as LinkedIn, Twitter, and Instagram to celebrate the achievements of young people on our programmes.

Where media consent is not given:

- All staff taking photos at sessions or events must be aware of who does and does not have media consent. Envision staff must ensure that any young person

without media consent wears a yellow lanyard at all events and sessions where photography or filming is taking place.

- Envision staff ensure any young person without media consent is not visible in any images or filming of groups or crowds.
- In the unlikely event that a young person without media consent is accidentally captured in an image or film, Envision staff must ensure that their face is blurred before using the image as per Photo Guidance, which is overseen by the Communications Manager
- Staff must ensure that Envision's CRM systems are up to date with media consent ahead of any events or sessions that may include photography or filming, and creation of any materials that may include images of young people.

To limit the potential risk of misuse of images and video we also implement the following procedures:

- **No photos of young people's faces should ever be used in social media posts.** This is regardless of photo/ media consent.
- Only pictures of young people's work/ activities which do not show faces are permitted to be shared via social media.
- Staff may post photos of activities or consenting adults to post on social media.
- Envision staff must remove photographs of young people from their personal devices within 24 hours of the photo being taken and then remove photos from devices and recycling bins (see Photo Guidance).
- Photos should be transferred from staff devices using USB cable and/or OneDrive, Microsoft Teams or Outlook apps with Envision logins. Staff should never use personal emails, cloud storage, G-Drive, We Transfer (or similar software) or WhatsApp to transfer images of young people.
- Envision has an overall ban on photography or filming taking place at events or sessions except by Envision staff (Lead Programme Coordinators, Programme Coordinators and the Communications Manager only), school staff (of their

own young people only), or by professional photographers or videographers who have been sufficiently safeguarding checked by Envision.

- External photographers or videographers are never left unsupervised with any child or young person.
- If a child or young person's name is visible in the image or filming, it will not be shared and will be sufficiently disposed of. It is acceptable if first names or initials only are visible, so long as they are not shared in a way that could allow this information to be used to identify young people (e.g. in a social media post that then shares the school and year group of the young person).
- If any other personal information about a child or young person is visible in the image – such as a school name, postcode or a club they belong to – it will not be shared and will be sufficiently disposed of.
- Envision staff will ensure that the rules on photography are clearly stated at all training of external volunteers and are clearly expressed at the beginning of each event or session where young people are working with external volunteers.

c. Sharing Images with Stakeholders or Partners

Envision staff must not, under any circumstances, share any downloadable or editable versions of photographs, images, videos, or footage that includes young people directly with any third-party or external stakeholders or partners (e.g. business partners, funders, or trusts) via email, mobile phone, or any form of online messaging platform, including WhatsApp or direct messaging on social media platforms.

Staff can share images of young people from a team with the Link Teacher for that team; however, they must ensure that no young people from another school, college, or institution are also visible in the image.

Photographs and videos including young people with media consent can only be shared with third parties in the following ways:

- As part of an Impact Report or marketing material in an un-editable format (e.g. PDF).
- As a link to a page on Envision's website.
- As a link to a video on Envision's website, Vimeo, or YouTube channel that cannot be downloaded.
- As part of the Collecting Evidence page in Team Logbooks, which are shared with judges at events under the supervision of a member of Envision staff and are then returned to the Programme Coordinators or Link Teachers.

i. Shareable stock images

As part of our Communications and Marketing strategy, the Communications Manager is in charge of creating and overseeing a 'Stock Images' folder on the organisational SharePoint. These images can be shared with funders and business partners in editable form (for example, as a .jpeg attachment to an email).

Photos in the 'Stock Images' folder include:

- Media that does not include the faces of young people or anything identifiable, e.g. crowd photos taken from behind young people, photos where young people feature but are blurred and in the background;
- Media of consenting adults only, such as mentor teams or Envision staff;
- Media featuring young people where additional consent has been acquired by the Communications Manager, and signed off by the Safeguarding Team, to specifically obtain images or filming for marketing use with a third-party. Events or sessions where stock image photography takes place will be considered thoughtfully and carefully by SMT and the Safeguarding Team and

will be communicated with parents and carers of young people who will be in attendance well in advance.

ii. Responding to requests

The Communications Manager is the only staff member permitted to send JPEG or editable images to third-party stakeholders. If external stakeholders request Envision share downloadable or editable versions of media, staff must respond with the following standardised message and CC the Communications Manager. They will then identify the best person to send the image to, ensuring we are able to track the sharing of images.

As per our Safeguarding Policy, Data Protection Policy, and GDPR Policy, Envision is not permitted to share any images or media of young people directly with third parties. Envision will share images as part of our reports, marketing materials, and on our website and social media platforms, however, we cannot share media that can be downloaded, edited, or used for external purposes. This is to ensure the safety, well-being, and protection of all young people on our programmes. Our policy can be found on our website. Stock images are available via our Communications Manager, Finn O'Ryan, who I am CC'ing here to pick up your request.

6. Communicating with young people

Communication between children and adults, by whatever method, should take place within clear and explicit professional boundaries.

Adults must not share any personal information with a child or young person, or request or respond to any personal information being shared by a child or young person which is not explicitly connected to their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Volunteers must NOT have any direct contact with a young person on the programme via personal devices, mobile phone, personal email or personal online accounts, including corporate email accounts and LinkedIn. If a volunteer wishes to offer work experience or work placement opportunities to a young person on our programme, this must go through Envision staff who will establish the appropriate connections with school staff to ensure adherence with the school's safeguarding processes and policies.

a. Mobile phones

Staff and volunteers must not give out their personal mobile number to a young person under any circumstances.

Envision staff working with young people under the age of 18 must not have any direct contact with young people via mobile phone or messaging service.

Envision staff working with the Youth Board and Grad Network may set up a collective WhatsApp group via a work phone.

Envision work phones will be monitored and reviewed by Regional Managers and all concerns will be reported to the DSL and/or Deputy DSL.

If it is necessary for staff to communicate with young people away from Envision meetings, then the office number should be given out and conversations should be held from this number, not a private mobile phone.

b. Social media

Staff and volunteers must not communicate with any young person directly via social media. All staff will need to sign a staff Code of Conduct.

Staff and volunteers must not accept any request from a young person to communicate with them via any other form of social media platform, such as Facebook, Twitter, Instagram, or LinkedIn.

Staff and volunteers should be aware of their digital profiles and should review the privacy and visibility settings of all their social media accounts at least once per year.

Any attempt to communicate or connect with staff or volunteers by young people via social media platforms should be ignored and reported to the Safeguarding Team.

This procedure refers to communications with all participants who are registered as school or college students.

c. Emails

Staff must not share their personal email address with young people. If they need to communicate with young people via email, this must be done through their work email

account, and they must copy the Link Teacher into the email and BCC their line manager.

Volunteers must not communicate with young people via email – either professional or personal – under any circumstances.

7. Online safety of young people

It is essential that young people are safeguarded from potentially harmful and inappropriate online material. Envision adheres to each school and college partners' approach to online safety when it comes to use of mobile and smart technology, remote facilitation, and access to the internet.

a. Virtual sessions and remote facilitation

Envision will periodically use video conferencing platforms such as Zoom, MS Teams, and Google Classrooms to facilitate or host sessions with young people.

Envision will always use the preferred video conferencing platform of the school and, where possible, will get the school to host the session via their internal systems.

Envision staff will then act as a co-host on the platform during the session.

The following guidance must be followed where online sessions or events include young people:

- Where Envision is hosting the event, staff must only use business accounts to facilitate events and sessions via Zoom or MS Teams. These accounts are accessed through a paid subscription and comply with GDPR regulations for storage of children and young people's data.
- Staff must make sure to have a neutral or plain background during the session.
- Staff must know how to set up and apply controls relating to young peoples' interactions, including microphones and cameras.

- Staff must ensure that sessions are password protected and include a 'waiting room' from which participants are manually admitted into the session. Attendance lists must be set up in advance of the session in order to do so effectively.
- Staff must treat video conferencing rooms as they would real life rooms, making sure that young people are not left unsupervised with an adult who does not have a full
- DBS check. Staff should frequently go in and out of all breakout rooms whist they are being used.
- Where a member of Envision staff is not physically present in the room with young people who are attending online sessions (e.g. staff are joining sessions from the Envision offices or their private residence), session and events must be recorded and saved in the designated folder. These can be shared with the school on request.
- Chats on Zoom and MS Teams must be monitored by the lead staff member, and any inappropriate use must be reported to the DSL immediately.
- Guidance notes must be shared with schools, young people, and external stakeholders who will attend or participate in online events or sessions in advance of the programme starting.

b. Filtering and monitoring

As per the Keeping Children Safe in Education 2026 guidance, schools and colleges should carefully consider how online safety is managed on their premises. This should include appropriateness of any filtering and monitoring systems across their internal IT systems, including use of mobile and smart technology.

During the programme, young people may be asked to conduct online research to support the development of their social action projects. To ensure that Envision is adhering to the Online Safety policies and procedures of our partner schools and colleges, Envision staff will only ever request that this research is conducted at school or college, where internet access is filtered and monitored to block harmful and inappropriate content, and not at home.

For further information, please see Appendix G.

c. Online abuse, neglect and exploitation

In Part one: Safeguarding information for all staff of Keeping Children Safe in Education 2026, under Abuse, neglect and exploitation, it states:

21. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline.

22. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, misinformation, disinformation and conspiracy theories, the non-consensual sharing of nudes or semi nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

It further defines four areas of risk (P44- 45)

135. The breadth 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, antisemitism, radicalisation, extremism, extreme sexual of physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that stimulate this, 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,) including those generated by AI and online bullying sharing other explicit images and online bullying.
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

In the House of Commons Committee Report on the Attitudes Towards Women and Girls in Educational Settings, it states:

21. *Those witnesses who worked with young people in schools suggested that negative attitudes towards women and girls had worsened during the coronavirus pandemic, which schools were unable to counter during lockdowns. Children were working remotely, with often unsupervised access to the internet, and sometimes in homes with traditional or entrenched attitudes towards the roles of men and women.*

22. *Teachers had noted that some secondary school students, often the younger ones, were returning to the classroom having missed key moments in their social development; and often displayed more extreme attitudes and behaviours.*

As per Section 1 Part c. child-on-child abuse, including harassment and violence of this policy, it is vital that all staff are aware that children can abuse other children and it can happen both inside and outside of school/college and online.

All staff should be clear as to the school or college's policy and procedures with regards to child-on-child abuse, as well as making clear that there is a zero-tolerance approach to child-on-child abuse, violence, or harassment and that it is never acceptable and will not be tolerated.

For further information, please read the report in full here.

8. Child protection record retention and storage guidance

According to Data Protection principles, records containing personal information should be:

- adequate, relevant and not excessive for the purpose(s) for which they are held;
- accurate and up to date;
- only kept for as long as is necessary.

a. Use of data

Envision's Data Protection and Privacy Policy outlines the retention, storage and destruction of all records that relate to concerns about a child's welfare and safety, and/or concerns about possible risks posed by people working or volunteering with children.

i. Incident reports

All incidents that do not relate to concerns or allegations about an Envision staff member, volunteers or school staff are recorded and stored securely via a Safeguarding Report on Salesforce. Records are visible only to the staff member who has submitted them, members of the Safeguarding Team, and the Chief Operating Officer as the administrator for the organisation's Salesforce.

Records relating to concerns or allegations about an Envision staff member, should be kept in the person's confidential personnel file – not on Salesforce – with a copy given

to the individual. Records kept for child protection reasons do not require consent from the adults concerned, however any formal action taken relating to allegations against staff or volunteers will be provided in writing to individual staff or volunteers.

Records relating to concerns or allegations about volunteers or school staff should be logged in the Allegations Report.

ii. DBS checks

Envision use staff and volunteer data to apply for DBS checks where necessary in line with our Safeguarding Policy. Where a DBS check is required, we ask staff and volunteers to apply online to our third-party DBS check provider, *KnowYourPeople*, and to share their personal details with *KnowYourPeople* and, subsequently, DBS. Envision then requires to see original identification documentation to verify that DBS check application. Once the checks are submitted, we will delete scans/shred paper copies of documentation that you provided for the purpose of your DBS application.

9. Monitoring and review of policies

Safeguarding reports are under constant internal review by the DSL and the Deputy DSL. The CEO, supported by the DSL, has responsibility for the implementation and review of this policy and will consider the record of incidents as part of the ongoing monitoring of safeguarding procedures, to consider whether existing security and online safety practices within the organisation are adequate. The Safeguarding Trustee undertakes frequent visits, including quarterly formalised meetings with the DSL, to review Safeguarding Reports and analyse any patterns or concerns. The Safeguarding Trustee and DSL led an annual full review of policy and procedure.

This policy was written by Anna Barradell, Director of Programmes and Impact, on 27/08/26. It was signed and approved by Simone Caine- Powells, Safeguarding Trustee, and is due for review on 1/09/2027

10.Appendices

Appendix A: Child-on-child sexual harassment and sexual violence

The following appendix is an excerpt from 'Part five: Child-on-child sexual harassment and sexual violence' from Keeping Children Safe in Education 2026. The excerpt is from pages 123 – 127. All staff are advised to read the section in full by visiting the link provided.

526. *This part of the statutory guidance outlines how schools and colleges should respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school or college premises, and/or online (what to look out for and indicators of abuse are set out in Part one of this guidance). As set out in Part one of this guidance, all staff working with children are advised to maintain an attitude of* ***'it could happen here'****, and this is especially important when considering child-on-child abuse.*

Understanding harmful sexual behaviour (HSB), sexual harassment and sexual violence

527. HSB can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence, it can occur

online or face-to-face (both physically and verbally) and is never acceptable. Schools and colleges should be aware of the importance of:

- making clear that there is a **zero-tolerance** approach to sexual harassment and sexual violence; that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment and in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it,
- recognising, acknowledging, and understanding the scale of HSB, sexual harassment and sexual violence and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported,
- recognising the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence,
- challenging behaviours, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them, and
- taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

528. Children who are victims of HSB, sexual harassment or sexual violence wherever it happens, may find the experience stressful and distressing. This will, in all likelihood,

adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

529. Whilst any report of HSB, sexual harassment or sexual violence should be taken seriously, staff should be aware it is more likely girls will be the victims of sexual harassment and sexual violence and more likely it will be perpetrated by boys. Children with disabilities are also three times more likely to be abused than their peers.

530. Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Harmful sexual behaviour (HSB)

531. The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context.

532. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. Advice on stages of typical sexual development and behaviour for different age groups can be found in Sexual development and behaviour in children | NSPCC Learning.

533. When assessing HSB, the ages and developmental stage of the children involved is critical. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years' difference or if one is pre-pubescent and the other is not. However, a younger child may also abuse an older child, especially if they hold power over them, e.g., due to a disability or physical size. Advice on responding to children who display sexualised behaviour is available in

Responding to children who display sexualised behaviour. Links to confidential specialist support are listed in Annex A.

534. It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This knowledge could form part of their safeguarding training and support preventative education, help implement effective safeguarding policies including a child protection policy and embed a whole school or college approach to safeguarding.

535. HSB can, in some cases, progress on a continuum. Early intervention in inappropriate behaviour such as misogyny can help to prevent escalation to more serious abuse such as sexual harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

Sexual harassment

536. Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school or college. In this context it specifically relates to child-on-child sexual harassment. Such behaviour can:

- violate a child's dignity,
- make them feel intimidated, degraded or humiliated, and
- create a hostile, offensive or sexualised environment.

537. Whilst not intended to be an exhaustive list, examples of sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names,
- sexual "jokes" or taunting,
- physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes. Schools and colleges should assess when such behaviour crosses into sexual violence – it is important to talk to and consider the experience of the victim,
- displaying pictures, photos or drawings of a sexual nature,
- upskirting (this is a criminal offence), and
- online sexual harassment, which may occur independently, or as a broader pattern of sexual harassment and/or sexual violence.

  This may include:
  - consensual and non-consensual making or sharing of nudes or semi-nudes. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice for schools and colleges,
  - sharing of unwanted explicit content,
  - sexualised online bullying,
  - unwanted sexual comments and messages, including, on social media,
  - sexual exploitation; coercion and threats, and
  - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

538. It is important that schools and colleges consider sexual harassment in broad terms. If left unchallenged, it can foster a culture that normalises inappropriate behaviour and increases the risk of leading to sexual violence.

Sexual violence

539. Schools and colleges should be aware that child-on-child sexual violence can and does occur, both inside and outside of school/college.

In this guidance, sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents.

Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. (NOTE - Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

What consent is: Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time

activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice:

- a child under the age of 13 can never consent to any sexual activity,
- the age of consent is 16, and
- sexual intercourse without consent is rape.

For further guidance refer to Rape Crisis England & Wales - Sexual consent

Further details on specialist support and interventions can be found in Annex A of Keeping Children Safe in Education 2026

Appendix B: Signs of abuse, neglect and exploitation

Signs of physical abuse	Signs of neglect
Consider the possibility of physical abuse when the young person: • Has unexpected burns, bites, bruises, broken bones or black eyes • Has fading bruises or other marks noticeable after an absence from the programme • Seems frightened of the parents and protests or cries when it is time to go home • Shrinks at the approach of adults • Reports injury by a parent or other caregiver Consider the possibility of physical abuse when the parent, guardian or other adult care giver: • Offers conflicting, unconvincing or no explanation for the young person's injury	Consider the possibility of physical abuse when the young person: • Is frequently absent for periods of time from the programme • Begs for, or steals food or money • Lacks needed medical or dental care, immunisations or glasses • Is consistently dirty and has severe body odour • Lacks sufficient clothing for the weather • Abuses alcohol or other drugs • States that there is no one at home to provide care Consider the possibility of neglect when the parent, guardian or other adult care giver: • Appears to be indifferent to the young person • Seems apathetic or depressed

• Uses harsh physical discipline with the young person	• Describes the young person in a negative or detrimental way • Behaves irrationally or in a bizarre manner Is abusing alcohol or other drugs

Signs of emotional abuse	Signs of online abuse
• seem unconfident or lack self-assurance • struggle to control their emotions/ have extreme outbursts • have difficulty making or maintaining relationships • act in a way that's inappropriate for their age. • Use language you wouldn't expect them to know for their age • Act in a way or know about things you would not expect them to know for their age. • Seems isolated from their parents • Lack social skills • Have few or no friends	• spend a lot more or a lot less time than usual online, texting, gaming or using social media • seem distant, upset or angry after using the internet or texting • be secretive about who they're talking to and what they're doing online or on their mobile phone • have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.

For more information on the types of abuse children may face please visit:
https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/

Appendix C: Child Criminal exploitation (CCE) and Child Sexual Exploitation (CSE)

The following appendix is informed by Criminal Exploitation of Children and Vulnerable Adults: and Child Sexual Exploitation: Definition and Guide for Practitioners, as well as the information found in Keeping Children Safe in Education 2026 pages 16-18. Staff are advised to read all documents in detail.

What is Child criminal exploitation (CCE) and child sexual exploitation (CSE)?

Both CCE and CSE 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 criminal or sexual activity. It may involve an 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. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE 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. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Child criminal exploitation (CCE)

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. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.

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)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative 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, for example 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. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Who is vulnerable to CCE and CSE?

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- *appear with unexplained gifts, money or new possessions; · associate with other children involved in exploitation;*
- *suffer from changes in emotional well-being;*
- *misuse drugs and alcohol;*
- *go missing for periods of time or regularly come home late; and*
- *regularly miss school or education or do not take part in education.*

Children who have been exploited will need additional support to help maintain them in education.

Some additional specific indicators that may be present in CSE are children who:

- *have older boyfriends or girlfriends; and*
- *suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant*

Further information on signs of a child's involvement in sexual exploitation is available in the DfE guidance: Child sexual exploitation: guide for practitioners.

Appendix D: County lines and gangs

The following appendix is informed by Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance, NSPCC: Gangs and Criminal Exploitation, as well as the information found in Keeping Children Safe in Education 2026. Staff are advised to read all documents in detail.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office Child exploitation disruption toolkit and County Lines Toolkit For Professionals | The Children's Society.

What is a gang?

The word 'gang' means different things in different contexts, the government in their paper 'Safeguarding children and young people who may be affected by gang activity' distinguishes between peer groups, street gangs and organised criminal gangs.

- ***Peer group:*** *A relatively small and transient social grouping which may or may not describe themselves as a gang depending on the context.*
- ***Street gang:*** *"Groups of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity."*

- ***Organised criminal gangs:*** *"A group of individuals for whom involvement in crime is for personal gain (financial or otherwise). For most crime is their 'occupation."*

It's not illegal for a young person to be in a gang – there are different types of 'gang' and not every 'gang' is criminal or dangerous. However, gang membership can be linked to illegal activity, particularly organised criminal gangs involved in trafficking, drug dealing and violent crime.

How are young people recruited?

A child or young person might be recruited into a gang because of where they live or because of who their family is. They might join because they don't see another option or because they feel like they need protection.

Children and young people may become involved in gangs for many reasons, including:

- *peer pressure and wanting to fit in with their friends.*
- *they feel respected and important.*
- *they want to feel protected from other gangs, or bullies.*
- *they want to make money and are promised rewards.*
- *they want to gain status and feel powerful.*
- *they've been excluded from school and don't feel they have a future.*

Organised criminal gangs groom children and young people because they're less suspicious and are given lighter sentences than adults.

Who is vulnerable to being recruited for a gang?

The national picture on county lines continues to develop but there are recorded cases of:

- *children as young as 12 years old being exploited or moved by gangs to courier drugs out of their local area; 15-16 years is the most common age range.*
- *both males and females being exploited.*
- *White British children being targeted because gangs perceive they are more likely to evade police detection but a person of any ethnicity or nationality may be exploited.*
- *the use of social media to make initial contact with children and young people.*
- *class A drug users being targeted so that gangs can take over their homes (known as 'cuckooing').*

We do know that county lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults; some of the factors that heighten a person's vulnerability include:

- *having prior experience of neglect, physical and/or sexual abuse*
- *lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example) social isolation or social difficulties.*
- *economic vulnerability.*
- *homelessness or insecure accommodation status.*
- *connections with other people involved in gangs.*
- *having a physical or learning disability.*
- *having mental health or substance misuse issues.*
- *being in care (particularly those in residential care and those with interrupted care histories).*
- *being excluded from mainstream education, in particular, attending a Pupil Referral Unit.*

What signs should I look out for?

A child or young person who is being exploited in any way may exhibit some of these signs. This is not an extensive list, and when safeguarding children, it is vital that any sudden changes in a person's lifestyle is seen as a potential indicator and must be referred to a Designated Safeguarding Lead.

Some potential indicators of criminal or sexual exploitation, or involvement in county lines or gangs include:

- *persistently going missing from school or home and / or being found out-of-area;*
- *unexplained acquisition of money, clothes, or mobile phones*
- *excessive receipt of texts / phone calls and/or having multiple handsets*
- *relationships with controlling / older individuals or groups*
- *leaving home / care without explanation*
- *suspicion of physical assault / unexplained injuries*
- *parental concerns*
- *carrying weapons*
- *significant decline in school results / performance*
- *gang association or isolation from peers or social networks*
- *self-harm or significant changes in emotional well-being.*

Dangers of criminal exploitation include:

- *being subject to threats, blackmail and violence*
- *being exploited and forced to commit crimes*

- *being arrested, including for crimes committed by the gang that they have not directly committed under the law of joint enterprise*
- *not being able to leave or cut off ties with the gang*
- *having their safety or the safety of friends and family threatened*
- *risk of physical harm, rape and sexual abuse*
- *risk of emotional abuse*
- *risk of severe injury or being killed*
- *abusing drugs, alcohol and other substances*
- *long term impact on education and employment options.*

Exploiting a child into committing crimes in abusive. Children who are targeted can also be groomed, physically abused, emotionally abused, sexually exploited or trafficked. However, as children involved in gangs often commit crimes themselves, sometimes they aren't seen as victims by adults and professionals, despite the harm they have experienced. It's important to spot the signs and act quickly if you think a child is being groomed or is becoming involved with a gang.

Childline has advice for young people who are in a gang or worried about a friend.

Appendix E: Domestic violence

The following appendix is informed by Keeping children Safe in Education 2026, page 161.

The Domestic Abuse Act 2021 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 definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent or care giver abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information or those working with domestic abuse victims and perpetrators, including the impact on children.

Domestic abuse is one of the most prevalent forms of abuse, with Women's Aid estimating that 160,000 children are currently living in households where domestic abuse is taking place. This is likely to be an underestimate, however, with much abuse remaining hidden and not coming to the attention of services. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this 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 in this document should be followed and both young victims and young perpetrators should be offered support.

Appendix F: Serious violence

There are a number of indicators, which may signal children are at risk from, or are involved in committing serious violence. These may include:

- increased absence from school or college,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in educational performance,
- signs of self-harm or a significant change in wellbeing, or signs of assault or
- unexplained injuries, and
- 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.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male,
- having been suspended, spent time in Alternative Provision or permanently
- excluded from school,
- having experienced child maltreatment,
- having been involved in offending, such as theft or robbery,
- having used drugs or alcohol in early adolescence, and
- having previously been a victim or previously perpetrated violence

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can

concentrate in particular places. These times can be particularly risky for young people involved in serious violence. It is important that schools and colleges try to understand where these places are, with a view to working with partners to promote safety for children.

Listening to children and consulting with staff can help establish when and where they feel unsafe.

Working with wider partners can also help build understanding of the local context beyond the school or college and help co-ordinate a collective safeguarding response around the school day.

Appendix G: Filtering and monitoring

The following appendix is an excerpt from 'Part two: The management of safeguarding' from Keeping Children Safe in Education 2026. The excerpt is from pages 46-47 and covers 'Filtering and monitoring'. Staff are advised to read the section in full by visiting the link provided.

Filtering and monitoring

140. *Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how*

to escalate concerns when identified. Governing bodies and proprietors should consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

141. *The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.*

142. *To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards which set out that schools and colleges should:*

- *identify and assign roles and responsibilities to manage filtering and monitoring systems*
- *review filtering and monitoring provision at least annually*
- *block harmful and inappropriate content without unreasonably impacting teaching and learning*
- *have effective monitoring strategies in place that meet their safeguarding needs.*

143. *Governing bodies and proprietors should review the standards and discuss with IT staff.*

Appendix H: Ofsted 'Safeguarding in Schools' (Extract)

The following appendix are excerpts from Ofsted's 'Safeguarding in Schools' document. These are taken from pages 5-8. Staff are advised to read all documents in detail.

Ofsted adopts the definition of safeguarding used in the Children Act 2004 and in the Department for Education and Skills (now DfE) guidance document Working together to safeguard children, which focuses on safeguarding and promoting children's and learners' welfare.

This can be summarised as:

- *protecting children from maltreatment inside or outside the home, including online*
- *preventing impairment of children's and learners' health or development*
- *ensuring that children grow up in safe and effective care circumstances consistent with the provision of safe and effective care*
- *Taking action to give all children the best outcomes.*

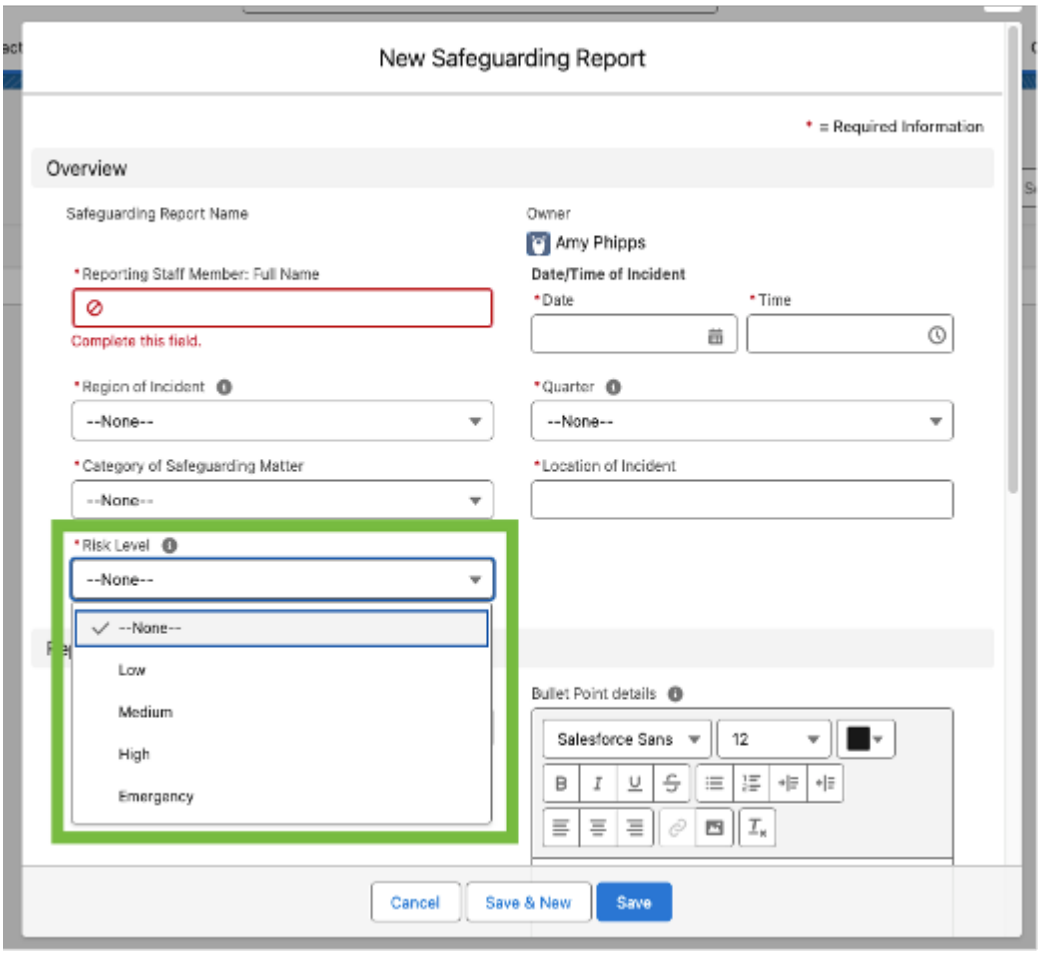
Key features of outstanding practice

Most of the features of outstanding practice are found, to a greater or lesser extent, in all effective schools with outstanding safeguarding arrangements. It is a wide-ranging list; in outstanding schools safeguarding permeates all aspects of school life. These features are covered in more detail in the body of the report and illustrated with examples of best practice from outstanding schools. In summary, the key features of outstanding practice include:

- *high-quality leadership and management that makes safeguarding a priority across all aspects of a school's work*
- *stringent vetting procedures in place for staff and other adults*
- *rigorous safeguarding policies and procedures in place, written in plain English, compliant with statutory requirements and updated regularly; in particular, clear and coherent child protection policies*
- *child protection arrangements that are accessible to everyone, so that pupils and families, as well as adults in the school, know who they can talk to if they are worried*
- *excellent communication systems with up-to-date information that can be accessed and shared by those who need it*
- *a high priority given to training in safeguarding, generally going beyond basic requirements, extending expertise widely and building internal capacity*
- *robust arrangements for site security, understood and applied by staff and pupils*
- *a curriculum that is flexible, relevant and engages pupils' interest; that is used to promote safeguarding, not least through teaching pupils how to stay safe, how to protect themselves from harm and how to take responsibility for their own and others' safety*
- *courteous and responsible behaviour by the pupils, enabling everyone to feel secure and well-protected*
- *well thought out and workable day-to-day arrangements to protect and promote pupils' health and safety*
- *rigorous monitoring of absence, with timely and appropriate follow-up, to ensure that pupils attend regularly*
- *risk assessment taken seriously and used to good effect in promoting safety.*

Appendix I: Example of safeguarding report (Salesforce)

Below is an overview of an example safeguarding report on Salesforce.



When submitting a report to Salesforce, you must complete the following fields:

• Reporting Staff Member: Full Name • Region • Risk Level	• Date and Time of Incident • Category of Safeguarding Matter	• Location of Incident • Organisation • Cohort