



Safeguarding and Child Protection Policy

Owner: Lets Make Change

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Approved by: Joseph Fitzpatrick

Version	Date	Author/Reviewed By	Summary of Changes	Approved By	Review Date
1.0	01/06/26	Alex Fitzpatrick	Initial policy created	Joseph Fitzpatrick	June 2027
1.1	30/06/26	Alex Fitzpatrick / DSL	Updated to reflect Keeping Children Safe in Education 2025 and Working Together to Safeguard Children 2026 statutory guidance. Strengthened sections on online safety, child-centred practice, information sharing, attendance, low-level concerns, Operation Encompass and safeguarding outside the home.	Joseph Fitzpatrick	July 2027

Let's Make Change (LMC)

Safeguarding and Child Protection Policy

1. Policy Statement

Let's Make Change (LMC) is committed to safeguarding and promoting the welfare of all children and young people.

Safeguarding is everyone's responsibility. All staff, tutors, volunteers, contractors and professionals working on behalf of LMC have a duty to protect children from harm, abuse, neglect, exploitation and inappropriate treatment.

LMC recognises that effective safeguarding requires:

- A child-centred approach;
- Safe recruitment practices;
- Clear reporting procedures;
- Effective multi-agency working;
- Appropriate information sharing;
- Ongoing staff training;
- A culture where safeguarding concerns are taken seriously.

The welfare of the child is paramount and will always take precedence in decision-making.

2. Scope

This policy applies to:

- Employees;
- Tutors;
- Volunteers;
- Directors and Managers;
- Contractors and consultants;
- Learners attending LMC provision;
- Partner organisations delivering services on behalf of LMC.

The policy applies to:

- One-to-one tutoring;
- Group sessions;
- Community-based provision;
- Educational visits;
- Online learning environments;
- Any activity delivered by or on behalf of LMC.

3. Legislative Framework

This policy is informed by:

- Keeping Children Safe in Education 2025;
- Working Together to Safeguard Children 2026;
- Children Act 1989;
- Children Act 2004;
- Education Act 2002;
- Equality Act 2010;
- Human Rights Act 1998;
- Counter-Terrorism and Security Act 2015;
- Data Protection Act 2018;
- UK GDPR;
- Children and Social Work Act 2017;
- Victims and Prisoners Act 2024 (Operation Encompass)
- Domestic Abuse Act 2021.

LMC will ensure safeguarding arrangements remain compliant with current legislation and statutory guidance.

4. Key Safeguarding Principles

LMC believes that:

- Every child has the right to be safe.
- Every child has the right to be heard.
- Safeguarding is everyone's responsibility.
- Safeguarding is child-centred. The wishes, feelings and lived experiences of children will be sought, listened to and taken seriously when making decisions affecting them.
- Staff will maintain professional curiosity where concerns exist, recognising that children may not always disclose abuse directly.
- Early intervention can prevent harm.
- Concerns should never be ignored.
- Information should be shared appropriately where it helps protect a child.
- Children should be supported to achieve positive outcomes.

Safeguarding includes:

- Protecting children from maltreatment;
- Preventing impairment of children's mental and physical health;
- Ensuring children grow up in safe and effective care;
- Taking action to enable children to achieve the best outcomes.

5. Designated Safeguarding Lead (DSL)

LMC has appointed a Designated Safeguarding Lead (DSL) who has overall responsibility for safeguarding and child protection.

The DSL is responsible for:

- Ensuring staff receive annual safeguarding updates in addition to formal safeguarding training;
- Promoting a culture of safeguarding across the organisation;
- Ensuring effective information sharing with safeguarding partners;
- Maintaining oversight of children who are absent from education;
- Supporting staff in managing low-level concerns regarding adults working with children.
- Managing safeguarding concerns and referrals;
- Providing safeguarding advice and support to staff;
- Liaising with Children's Social Care and external agencies;
- Maintaining safeguarding records;
- Ensuring staff receive appropriate safeguarding training;
- Monitoring safeguarding procedures;
- Ensuring safeguarding policies are reviewed annually.

The DSL must have appropriate safeguarding training and maintain knowledge of local safeguarding procedures.

6. Deputy Designated Safeguarding Leads (DDSLs)

Where appointed, Deputy DSLs will:

- Support the DSL;
- Act in the DSL's absence;
- Assist with safeguarding referrals;
- Maintain safeguarding records;
- Support staff with safeguarding concerns.

Ultimate safeguarding responsibility remains with the DSL.

7. Roles and Responsibilities

Directors and Senior Management

Responsible for:

- Ensuring safeguarding arrangements are effective;
- Providing sufficient safeguarding resources;
- Supporting the DSL;

- Monitoring safeguarding compliance;
- Ensuring safer recruitment procedures are followed.

Tutors, Staff and Volunteers

Responsible for:

- Maintaining vigilance;
- Recognising signs of abuse and neglect;
- Reporting concerns immediately;
- Following safeguarding procedures;
- Completing safeguarding training;
- Maintaining professional boundaries.

Staff must never assume that someone else has reported a concern.

Learners

Learners are encouraged to:

- Speak to trusted adults when worried;
- Report concerns about themselves or others;
- Participate in safeguarding education.

8. Recognising Abuse and Neglect

Staff should be aware that abuse may take many forms.

The four recognised categories are:

Physical Abuse

Physical harm caused deliberately or through failure to prevent injury.

Examples include:

- Hitting;
- Shaking;
- Burning;
- Poisoning;
- Suffocation.

Emotional Abuse

Persistent emotional maltreatment causing adverse effects on emotional development.

Examples include:

- Humiliation;
- Intimidation;
- Threats;
- Rejection;
- Exposure to domestic abuse.

Sexual Abuse

Forcing or enticing a child to take part in sexual activities.

Examples include:

- Sexual assault;
- Grooming;
- Sexual exploitation;
- Exposure to inappropriate sexual content.

Neglect

Persistent failure to meet a child's basic physical or emotional needs.

Examples include:

- Lack of supervision;
- Poor hygiene;
- Inadequate nutrition;
- Failure to access medical care.

9. Recognising Vulnerability

Some children may face additional safeguarding risks.

These may include children who:

- Have Special Educational Needs and Disabilities (SEND);
- Are looked after or previously looked after;
- Experience mental health difficulties;
- Are young carers;
- Are affected by domestic abuse;
- Are missing education;
- Are vulnerable to exploitation;
- Experience discrimination;
- Have unstable living arrangements.

Staff should recognise that additional vulnerabilities may make it harder for children to disclose concerns.

10. Safeguarding outside the home

LMC recognises that safeguarding risks may arise both inside and outside the home.

Staff should remain alert to risks occurring in the community, online and within peer groups.

These may include:

- Criminal exploitation
- Sexual exploitation
- Serious youth violence
- County Lines
- Harmful online influences
- Radicalisation
- Domestic abuse within young people's own relationships
- Missing education
- Extra-familial harm

Staff should consider the wider context in which harm occurs and work with safeguarding partners where appropriate.

11. Reporting Safeguarding Concerns

Staff should never assume that another professional has reported a safeguarding concern.

Any uncertainty should be discussed immediately with the DSL.

Staff must:

1. Listen carefully.
2. Remain calm.
3. Take concerns seriously.
4. Record information accurately.
5. Report concerns without delay.

Staff must not:

- Investigate concerns themselves;
- Promise confidentiality;
- Ask leading questions;
- Delay reporting concerns.

Where a child is at immediate risk of harm:

- Contact emergency services (999);
- Inform Children's Social Care;
- Notify the DSL immediately.

Safeguarding concerns must always take priority over organisational or reputational considerations.

12. Managing Disclosures

A disclosure occurs when a child shares information indicating that they may be experiencing abuse, neglect, exploitation or harm.

When a learner makes a disclosure, staff must:

- Listen carefully and attentively;
- Remain calm and reassuring;
- Take the disclosure seriously;
- Allow the learner to speak freely;
- Staff should recognise that some children may not be ready to disclose abuse, may not recognise that what they are experiencing is abuse or may communicate through behaviour rather than words.
- Reassure the learner that they have done the right thing by speaking out.

Staff must not:

- Promise confidentiality;
- Ask leading or investigative questions;
- Express shock, disbelief or anger;
- Make assumptions;
- Attempt to investigate the matter themselves.

Staff should explain that information may need to be shared with safeguarding professionals to help keep the learner safe.

All disclosures must be reported to the DSL immediately and recorded accurately.

13. Recording Safeguarding Concerns

Accurate record-keeping is essential to effective safeguarding.

Safeguarding records should:

- Be completed as soon as possible after a concern arises;
- Be factual and objective;
- Distinguish between facts, observations and opinions;

- Include dates, times, locations, and names where relevant;
- Be signed and dated by the person making the report.

Records must not:

- Include personal opinions unless clearly identified;
- Contain assumptions or speculation;
- Be altered after submission.

Safeguarding records will be stored securely and managed in accordance with the Data Protection, Privacy and Information Security Policy.

14. Early Help

LMC recognises the importance of identifying concerns early before they escalate into more significant safeguarding issues.

Early Help may be appropriate where:

- Attendance is declining;
- Behaviour changes are observed;
- Emotional wellbeing concerns arise;
- Family difficulties are affecting the learner;
- Additional support is needed.

The aim of Early Help is to:

- Improve outcomes for children and families;
- Prevent concerns from escalating;
- Promote positive engagement with services;
- Reduce safeguarding risks.

The DSL will determine when Early Help referrals are appropriate and will work collaboratively with relevant agencies.

15. Child-on-Child Abuse

LMC adopts a zero-tolerance approach to child-on-child abuse.

Abuse should never be dismissed as:

- Banter
- Growing up
- Boys being boys
- Just a joke

Examples include:

- Bullying;
- Cyberbullying;
- Physical abuse;
- Sexual harassment;
- Sexual violence;
- Initiation or hazing behaviours;
- Sharing sexual images without consent;
- Abuse within relationships.

Staff will challenge inappropriate behaviours before they escalate into abusive behaviour.

All concerns will be taken seriously and responded to in accordance with safeguarding procedures.

Victims will always be supported and protected.

16. Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of sexual abuse.

It occurs where an individual or group:

- Takes advantage of an imbalance of power;
- Coerces, manipulates or deceives a child;
- Engages a child in sexual activity in exchange for something the child needs or wants.

Indicators may include:

- Missing episodes;
- Older friendships or relationships;
- Gifts or money without explanation;
- Secretive behaviour;
- Substance misuse;
- Changes in appearance or behaviour.

Staff must report any concerns immediately to the DSL.

17. Child Criminal Exploitation (CCE)

Child Criminal Exploitation occurs when children are manipulated or coerced into criminal activity.

Children may be exploited to:

- Transport drugs;
- Store weapons;
- Commit theft;
- Participate in violence;
- Facilitate criminal activity.

Indicators may include:

- Unexplained money or possessions;
- Missing education;
- Association with older individuals;
- Frequent travelling;
- Changes in behaviour;
- Increased secrecy.

Any concerns regarding criminal exploitation must be reported immediately.

18. County Lines

County Lines is a form of Child Criminal Exploitation.

It involves criminal networks using children to transport drugs or money between locations.

Warning signs may include:

- Repeated missing episodes;
- Unexplained travel;
- Multiple mobile phones;
- New expensive items;
- Changes in peer groups;
- Increased aggression or anxiety.

Children involved in County Lines are victims of exploitation and should be treated as such.

Concerns must be referred immediately through safeguarding procedures.

19. Online Safety

Technology and Online Harm

LMC recognises that technology is a significant factor in many safeguarding concerns.

Harm may occur:

- Online
- Offline

- Through a combination of both.

Staff should remain vigilant to:

- Online grooming
- Cyberbullying
- Sharing of nude or semi-nude images
- Online exploitation
- Online fraud
- Misogynistic or extremist content
- Artificial intelligence misuse
- Harmful online communities

Learners may face risks including:

- Cyberbullying;
- Grooming;
- Sexual exploitation;
- Radicalisation;
- Harmful content;
- Online scams and fraud.

LMC will:

- Promote safe online behaviour;
- Educate learners on online risks;
- Monitor concerns appropriately;
- Follow safeguarding procedures where online harm is suspected.

Staff must report any online safeguarding concerns to the DSL immediately.

This section should be read alongside the LMC Online Safety (E-Safety) Policy.

20. Prevent Duty and Radicalisation

LMC has a duty under the Counter-Terrorism and Security Act 2015 to have due regard to preventing people from being drawn into terrorism.

Radicalisation refers to the process through which an individual comes to support extremist ideologies.

Indicators may include:

- Sudden changes in beliefs;
- Intolerance towards others;
- Use of extremist language;
- Accessing extremist material;
- Isolation from peers and family.

Staff should not attempt to investigate concerns.

Any concerns regarding radicalisation must be reported to the DSL immediately.

Where appropriate, referrals may be made through Prevent or Channel processes.

21. Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in the United Kingdom and is recognised as a form of child abuse.

FGM involves procedures that intentionally alter or injure female genital organs for non-medical reasons.

Possible indicators include:

- Discussions of special ceremonies or overseas travel;
- Extended absences from education;
- Difficulty sitting or walking;
- Requests for medical assistance;
- Emotional distress following travel.

All staff must remain vigilant.

Where a teacher discovers that FGM appears to have been carried out on a girl under the age of 18, there is a legal duty to report this to the police.

All concerns must also be reported immediately to the DSL.

22. Mental Health and Wellbeing

LMC recognises that positive mental health and emotional wellbeing are essential to a child's development, learning, and safety.

While mental health concerns do not automatically constitute a safeguarding issue, they may become a safeguarding concern where there is:

- Risk of harm to self;
- Risk of harm to others;
- Neglect of basic needs;
- Significant deterioration in wellbeing;
- Concerns regarding exploitation or abuse.

Staff should remain alert to signs including:

- Withdrawal from activities;
- Sudden changes in behaviour;

- Low mood or anxiety;
- Self-harming behaviours;
- Expressions of hopelessness;
- Significant changes in attendance or engagement.

Where concerns arise, staff must:

- Record observations;
- Inform the DSL;
- Follow safeguarding procedures where appropriate;
- Work with parents, carers and external professionals where required.

LMC aims to create an environment where learners feel safe discussing emotional wellbeing concerns.

23. Attendance and Children Missing Education (CME)

LMC recognises that poor attendance can be an indicator of safeguarding concerns.

Attendance concerns may be linked to:

- Neglect;
- Exploitation;
- Mental health difficulties;
- Family difficulties;
- Abuse;
- Criminal activity;
- Missing education.

Staff must report concerns where a learner:

- Has unexplained absences;
- Is repeatedly late;
- Is frequently absent;
- Appears reluctant to attend;
- Goes missing during sessions.

Where a learner's whereabouts are unknown, LMC will follow:

- Local Authority Children Missing Education procedures;
- Safeguarding procedures;
- Attendance procedures.

Appropriate referrals will be made where necessary.

Children Missing Education

LMC recognises that repeated absence, prolonged absence and children missing education may be indicators of abuse or neglect.

Attendance concerns will be monitored and shared with safeguarding professionals where appropriate.

Staff should report patterns of absence immediately to the DSL.

24. Looked After and Previously Looked After Children

LMC recognises that Looked After Children (LAC) and Previously Looked After Children (PLAC) may face additional safeguarding challenges.

These learners may have experienced:

- Trauma;
- Abuse;
- Neglect;
- Placement instability;
- Attachment difficulties.

LMC will:

- Work collaboratively with carers and professionals;
- Consider individual needs;
- Support educational engagement;
- Promote emotional wellbeing;
- Ensure safeguarding concerns are addressed promptly.

Staff should remain aware of the additional vulnerabilities these learners may experience.

25. Private Fostering

Private fostering occurs when a child under the age of 16 (or under 18 if disabled) is cared for by someone who is not:

- A parent;
- A close relative;
- A legal guardian;

for 28 days or more.

Close relatives include:

- Grandparents;
- Brothers and sisters;

- Aunts and uncles;
- Step-parents.

If staff become aware of a private fostering arrangement, they must report this immediately to the DSL.

The DSL will notify Children's Social Care in accordance with legal requirements.

26. Operation Encompass

Where applicable, LMC will work with local authorities and police to receive and respond to Operation Encompass notifications relating to domestic abuse incidents affecting learners.

Information received will be shared only with those who need to know in order to support the learner.

27. Allegations Against Staff, Tutors and Volunteers

LMC takes all allegations against staff seriously.

An allegation may involve concerns that an adult has:

- Behaved in a way that harmed a child;
- Possibly committed a criminal offence against a child;
- Behaved in a way that indicates they may pose a risk to children;
- Behaved in a way that may make them unsuitable to work with children.

Any allegation must be reported immediately to:

- The Director;
- The DSL (where appropriate).

Where allegations involve the DSL, concerns must be reported directly to the Director.

The Local Authority Designated Officer (LADO) will be consulted where required.

Staff must not investigate allegations themselves.

28. Low-level Concerns about Adults

LMC promotes a culture of openness where concerns about the behaviour of adults working with children can be raised without fear.

Low-level concerns will be recorded, reviewed and managed appropriately in accordance with the Staff Code of Conduct and Allegations Against Staff Policy.

29. Safer Recruitment

LMC is committed to ensuring that unsuitable individuals do not gain access to children through employment or volunteering opportunities.

Recruitment processes will include:

- Application forms;
- Interviews;
- Identity verification;
- Employment history checks;
- Reference checks;
- Enhanced DBS checks;
- Barred List checks where appropriate;
- Verification of qualifications where required.

Safer recruitment procedures apply to:

- Employees;
- Tutors;
- Volunteers;
- Contractors working directly with learners.

All recruitment decisions will prioritise safeguarding.

30. Information Sharing and Confidentiality

Effective safeguarding requires appropriate information sharing.

LMC recognises that:

- Data protection legislation does not prevent safeguarding information being shared;
- Information should be shared where necessary to protect a child;
- Decisions should be proportionate and lawful.

Staff must:

- Share information on a need-to-know basis;
- Follow safeguarding procedures;
- Maintain confidentiality where appropriate;
- Store records securely.

Children and families should be informed where possible unless doing so would place a child at greater risk.

This section should be read alongside the Data Protection, Privacy and Information Security Policy.

Information Sharing

Effective safeguarding relies upon appropriate and timely information sharing.

Information will be shared where necessary to protect a child, in accordance with UK GDPR, the Data Protection Act 2018 and Working Together to Safeguard Children.

Concerns about data protection must never prevent appropriate safeguarding action.

31. Training and Professional Development

All staff, tutors, and volunteers will receive safeguarding training appropriate to their role.

Training will include:

- Child protection procedures;
- Recognising abuse and neglect;
- Reporting concerns;
- Online safety;
- Prevent Duty;
- Child-on-child abuse;
- Safeguarding responsibilities.

The DSL and any Deputy DSLs will receive enhanced safeguarding training and regular updates.

Safeguarding training will be:

- Completed during induction;
- Refreshed regularly;
- Updated in line with statutory guidance.

Staff are expected to maintain an up-to-date understanding of safeguarding issues.

32. Whole Organisation Culture

Safeguarding Culture

LMC is committed to creating a safeguarding culture in which:

- Children feel safe.
- Staff feel confident to report concerns.
- Safeguarding is discussed openly.
- Professional curiosity is encouraged.
- Decisions are child-centred.
- Continuous learning and improvement are promoted.

33. Monitoring and Review

LMC is committed to maintaining effective safeguarding arrangements.

This policy will be reviewed:

- Annually;
- Following significant safeguarding incidents;
- Following changes in legislation or guidance;
- Following learning from audits, inspections, or reviews.

Management and the DSL will monitor:

- Safeguarding referrals;
- Training records;
- Incident reports;
- Policy compliance;
- Multi-agency feedback.

Continuous improvement will remain central to safeguarding practice.

34. Related Policies

This policy should be read alongside:

- Behaviour, Relationships and Anti-Bullying Policy;
- Attendance Policy;
- Health and Safety Policy;
- Lone Working Policy;
- Online Safety (E-Safety) Policy;
- Administration of Medication Policy;
- Equality, Diversity and Inclusion Policy;
- Data Protection, Privacy and Information Security Policy;
- Safer Recruitment Policy;
- Whistleblowing Policy;
- Complaints Policy.