



CONCORDIA SAFEGUARDING POLICY AND PROCEDURE

(Including Children, Young People, and Adult at Risk)

Designated Safeguard Lead for Concordia

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Responsible Manager	Victor Petersson (DSL)
Date of issue	February 2022
Version Number	1.1
Next date or review	February 2025
Approved by	Edlira Alku (TSL)

Version updates

1.1	<ul style="list-style-type: none">• Changed terminology from 'Vulnerable Adult' to 'Adult at Risk'.• Added definition of "Adult at Risk"• Changed age for Young Person Concordia Working with to outline 11-18, aligned with UK law, and to avoid confusion between YP and Adult / Adult at Risk• Removed referrals to NCS Safeguarding training modules (no longer applicable)• Added Digital Reporting option under "Reporting Abuse"• Added "Reporting a concern process" flowchart to appendix (C).• Updated Data storage statement
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1. Policy Statement

Concordia has a legal and moral duty to create and maintain the safest possible environment for children, young people and adults at risk to enjoy any volunteering, training, or farm focussed programme operated by Concordia, or in partnership with other organisations and agencies, including the community and voluntary sector as well as the National Citizen Service (NCS) programme.

This policy is aimed to safeguard the welfare of all children, young people, and adults at risk whom Concordia works with, directly, or that we come into contact with through our activities, from potential abuse. All staff, trustees, and volunteers will at all times show respect and understanding for the rights, safety, and welfare of all children, young people, and adults at risk with whom Concordia comes into contact with and conducts themselves in a way that reflects our principles.

Children – as per the Children’s Act 1989/2004, this is a term which refers to anyone who has not yet reached their 18th birthday.

Young People – a term that Concordia use to denote all children and young people who directly benefit from its services aged 11 – 18. Concordia has different procedures to follow whilst working with anyone aged over 18 – please see ‘Safeguarding Adults Safeguarding Policy and Procedures’.

Adults at risk – an adult at risk of abuse can be anyone over the age of 18, including service users, staff, or volunteers. Concordia adheres to the definition provided by the Care and Support Statutory Guidance 2014 which defines an adult at risk as a person who is age 18 years or over ‘who is or may be in need of community care services by reason of mental or other disability, age or illness’, and/or ‘who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation’. Concordia include adults under the age of 25 with an EHC plan in this group.

Whilst personal characteristics may make an individual more vulnerable i.e., disability and communication difficulties, it is the situation around the individual which may increase risk or place them at potential risk of harm. Safeguarding is contextual and many factors which increase vulnerability and risk are intersectional.

To achieve the above we:

- Create and maintain a safe organisational culture for all those whom Concordia serve and those working on our behalf
- Ensure that all staff and volunteers working with children, young people, or adults at risk are carefully selected, are checked by the Enhanced Disclosure and Barring Scheme (DBS) and understand and accept their responsibility for the safety of children, young people, and adults at risk in their care. Concordia staff will be checked every 2 years unless they are on the update service, where they will be checked before each programme starts.
- Raise awareness of child protection issues amongst community voluntary groups, partners, service users, farms, and any provider that we use for delivering NCS, The Emotional Wellbeing Programme, voluntary projects and farm workers.

- Ensure that the child/young person/adult at risk welfare is of paramount importance, regardless of age, gender, ability, or race, when planning, organising advising on and delivering children's/young person/adult at risk activities.
- Respond swiftly and appropriately to all suspicions or allegations of abuse, and to ensure confidential information is restricted to the appropriate external agencies and within Concordia. This should be on a 'need to know' basis.
- Raise the awareness of relevant staff, partner organisations, and volunteers of child protection issues through the provision of trainings and ensuring that everyone delivering our work has access to information about how to report concerns or allegations of child exploitation or abuse.
- Monitor and review the effectiveness of this policy on a regular basis.
- Ensure that the principles of this policy are adopted by all organisations or individuals with whom Concordia works, through the adoption of a policy, which meets the same level of determination with regard to child safety.
- Ensure that all staff, trustees, and volunteers are carefully recruited, trained, and supervised.
- All volunteers and staff who work directly with children/young people/adults at risk to be trained on Safeguarding, complete Safeguarding training module (if applicable) and to follow the Concordia's Safeguarding Policy and Procedures.
- Carefully assess all risks that children, young people, and adult at risk encounter and take all the necessary steps to minimise and/or manage them.
- Present our service users, staff, and volunteers with information about what we do and what can be expected from us.

This policy applies to all Concordia staff, interns, Seasonal NCS staff, freelance trainers and volunteers (including senior managers and trustees) who work with or come into contact with children, young people, and/or adults at risk through Concordia's activities.

We acknowledge that partners such as Local Authorities, Sports Clubs, Community Venues, educational institutions and other private or third sector organisations, will have their own policy to adhere to when they organise activities. However, it will be a requirement that all organisations carrying out activities on behalf of Concordia or receiving funding from Concordia to deliver, will declare they have an appropriate safeguarding policy and procedures in place.

2. Responsibilities

- Concordia's Designated Safeguarding Lead (DSL): Victor Petersson
- Concordia's Designated Safeguarding Officer (DSO) for CYP: Max Bateman, Charlotte Whitehead
- Trustee Safeguarding Lead (TSL): Edlira Alku

They can be contacted during working hours by telephone on +44 (0)1273 422 293

Outside working hours, they can be contacted on the emergency telephone number of +44 (0) 7872 117 009

The role of the Designated Safeguarding Lead:

- Ensure that there is strong organisational commitment to safeguarding across all core staff and trustees, which is clearly reflected in the culture, policies, working practices, attitudes, and behaviours.
- Promote a culture that ensures children, young people, and adults at risk are listened to and respected as individuals.
- Ensure an equitable volunteering, training and farm participant programme is delivered that offers equal access to all.
- Monitor the effectiveness of policy and procedures.
- Require staff and volunteers to adopt best practice to safeguard and protect children/young people/adults at risk from abuse, and themselves against false/ risk of allegations.
- Provide a comprehensive induction for all staff (paid and voluntary), which includes familiarisation with the Safeguarding Policy and Procedures.
- Where necessary, identify and implement appropriate training to enable individuals to recognise their responsibilities with regard to their own good practice, recognising poor practice and reporting suspected concerns of possible abuse.
- Ensure staff (paid and voluntary) with designated responsibilities in relation to safeguarding children/young people/ adult at risk are provided with training to enable them to develop the necessary skills and knowledge and have regular opportunities to update their knowledge and understanding.
- Establish robust processes for recording incidents, concerns and referrals and storing these securely in compliance with relevant legislation.
- Develop clear processes for dealing with complaints about unacceptable and/or abusive behaviour towards young people and adults at risk, with clear timescales for managing and resolving these complaints.
- Respond to any allegations appropriately and implement the appropriate disciplinary and appeals procedures.
- Ensure that where there is direct responsibility for running/providing activities or services, operating standards are set out to ensure the highest possible standard of care.
- Update staff on new safeguarding developments.
- Implement good practice protocols in relation to the use of photography/video equipment and use of electronic communication and social media.
- Make contact details for Concordia's Designated Safeguarding Lead (DSL) available to staff and any agencies/organisations that we may work directly with.
- Provide children, young people, adults at risk and if necessary, their parents/carers, with information on where to go for help and advice in relation to abuse, harassment, and bullying.
- Make arrangements for supervision and support to be provided to staff and volunteers during and following an incident or allegation.
- Make referrals to external agencies when appropriate.
- Ensure that legal frameworks are followed such as:
 - The Children's Act 2004/2014
 - Working Together to Safeguard Children 2023
 - Care act 2014
 - Children's Act 1989 Defining Terms Section 17

- Children in Need and Section 47
- Children in Need of Protection
- Keeping Children Safe in Education (updated annually)
- UK Modern Slavery Act 2015
- Regulated activity with children in England v.3 (2013)
- Keep up to date with any legislative changes and updates

Safeguarding compliance is monitored by the Designated Safeguarding Lead and reported via the relevant sub-Committee, to the main Board.

3. Other Relevant Concordia Policies

This document is written in line with Concordia's other Safeguarding policies and procedures and should sit alongside these.

These include:

- Concordia's Digital Safeguarding Policy
- Concordia Adult Safeguarding Policy and Procedures

This policy should be read alongside our policies and procedures on:

- Employee Development
- Concordia Staff Handbook
- Data Protection - GDPR
- Whistle Blowing
- Complaints
- Health and Safety
- Risk Assessment
- Equal Opportunities and Equality
- Leaders Emergency Procedures Booklet
- Social Media
- Anti-bullying
- Anti-Radicalisation and Prevent
- DBS Policy
- Safer Recruitment
- Adult Safeguarding Policy and Procedure
- Staff Code of Conduct
- Participant Code of Conduct
- Modern Slavery Policy and Procedure

4. Management of Safeguarding

Concordia recognises that:

- Safeguarding is everyone's responsibility.
- The welfare of the child, young person, or adult at risk is paramount.

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Date: February 2024

Review Date: February 2025

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- All children, young people and adults at risk have an equal right to protection from all types of abuse and/or harm regardless of age, racial heritage, gender, disability, religious belief, sexual orientation, or identity.
- Some of the children, young people, and adult at risk that Concordia work with are additionally vulnerable – perhaps due to being away from their supportive networks, communication barriers, previous experiences etc.
- For safeguarding systems to be effective a partnership approach with children, young people, adult at risk, their parents and/or carers and other appropriate agencies is essential.
- Abuse is rarely a stand-alone event and often multiple issues overlap.
- In addition to emotional, physical, abuse and neglect, that there are a range of other safeguarding concerns that Concordia aims to protect children, young people, and adults at risk from, including but not limited to:
 - Bullying (including online bullying)
 - Trafficking
 - Exploitation
 - Domestic abuse
 - Peer-on-peer abuse
 - Self-harm (including harmful behaviours)
 - Mental health
 - Gangs & youth violence
 - Forced marriage
 - Female Genital Mutilation (FGM)
 - Extremism and radicalisation
 - Financial
 - Child Sexual Exploitation (CSE)
 - Prevent
 - County lines

Through Concordia's direct delivery, we will seek to keep children, young people, and adults at risk safe by:

- Valuing them, listening to them, and respecting them.
- Ensuring that all staff and volunteers working with children, young people, or adults at risk are carefully selected and are checked by the Enhanced Disclosure and Barring Scheme (DBS).
- Ensuring that all managers of staff and volunteers who work with children, young people and adults at risk have read and understood this policy and know what to do should any issue be raised to them.
- Ensuring that all staff and volunteers who work with children, young people and adults at risk know what to do if they have concerns and understand and accept their responsibility for the safety of children, young people, and adults at risk in their care.
- Providing effective management of our staff and volunteers through support, training, and quality assurance measures.
- Recording and storing information professionally and securely.

- Ensuring that we provide a safe physical environment for children, young people, and adults at risk, staff, and volunteers by applying health and safety regulations in accordance with the law and regulatory guidance.
- Responding swiftly and appropriately to all suspicions or allegations of abuse, and to ensure confidential information is restricted to the appropriate external agencies and designated staff within Concordia.
- Developing and implementing an effective digital safety policy and related procedures.
- Developing and implementing an anti-bullying policy and environment, ensuring that we deal effectively with any bullying that does occur.
- Ensuring that we have an effective complaints and whistleblowing policy and that all children, young people, adults at risk, their parents and/or carers, staff and volunteers are aware of these.
- Ensuring access to this policy to all children, young people, adult at risk, and their parents and/or carers via the Concordia website

Through working with Concordia's partners, we will seek to keep children, young people, and adult at risk safe by:

- Requiring those individuals or organisations that are funded or commissioned to provide any services on behalf of Concordia, to operate robust safeguarding policies and procedures.
- Ensuring that any concerns raised about children, young people, or adults at risk from any of Concordia's partners are shared with the appropriate Designated Safeguarding Lead in that organisation. On third party programmes staff will in addition follow the procedures set out by the safety management organisation.
- Raise awareness of child, young person, or adults at risk protection issues amongst community voluntary groups, partners, and any provider we use for delivering any Concordia programme.
- Raise the awareness of relevant staff, partner organisations and volunteers of child, young person, and adult at risk protection issues, through the provision of training.
- Maximise our influence to promote safeguarding practice and principles within our wider partnership roles and relationships.
- Where appropriate conduct care plans and risk assessments for individuals with any additional needs or support.

4.1. Safer Recruitment

Concordia will take all reasonable steps to assess the suitability of all staff (paid and voluntary) to work with children, young people and adult at risk using safeguarding checks as required by legislation. Concordia will follow the guidance chart provided in '[Supervision' and Regulated Activity Sport and Recreation Sector Guidance](#)' (March 2013) to determine if a DBS check is required.

Concordia will ensure that all staff and volunteers working with children, young people, or adults at risk are carefully selected, are checked by the Enhanced Disclosure and Barring Scheme (DBS), and understand and accept their responsibility for the safety of children, young people, and adults at risk in their care.

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Date: February 2024

Review Date: February 2025

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Concordia permanent staff will be required to obtain a new enhanced DBS record check every three years if in direct delivery, unless they are on the update service, where they will be checked before each programme starts. All seasonal staff working on a Concordia provision must obtain an enhanced DBS check or be on the DBS update service before commencing any role.

All DBS certificates must only be used in accordance with the DBS Code of Conduct (<https://www.gov.uk/government/publications/dbs-code-of-practice>). Concordia is completing the DBS checks through The Welsh Sports Association (WSA), via the trading arm Vibrant Nation.

Concordia will require all new staff and trustees to read and sign that they have read the Safeguarding policy and procedures as a pre-employment/appointment check.

All staff should be sensitive to any concerns about poor practice or abuse and act on them at an early stage. They should also offer appropriate support to those who report concerns or make complaints.

4.2. Signs and Types of Abuse

These are some signs that could alert staff and volunteers to the fact that children, young people, and adult at risk might be being abused:

- Unexplained bruising and injuries
- Sexually explicit language and actions
- Sudden changes in behaviour
- Something they said
- A change observed over a long period of time e.g. *Losing weight or being increasingly dirty or unkempt.*

If a child/young person/ adult at risk displays these signs it does not necessarily mean that they are at risk of abuse. Similarly, there may not be any signs; you may just feel something is wrong. If you are worried, it is **not** your responsibility to decide **if it is** abuse but it is your responsibility to act on your concerns and do something about it by reporting it appropriately to Concordia's safeguarding team.

4.3. Types of Abuse

Neglect: The actual or likely persistent and significant neglect of a child/young person/ adult at risk or the failure to protect a child/young person/ adult at risk from exposure to any kind of danger, including cold or starvation, or persistent failure to carry out important aspects of care, resulting in the significant impairment of a child's/young person's/ adult at risk's health or development. Neglect in recreational or social activities might occur if staff and/or volunteers fail to ensure that a child/young person/ adult at risk in their care, is safely protected or is exposed to undue risk, cold, sunburn or injury.

Sexual Abuse: Actual or likely sexual exploitation of a child/young person/ adult at risk is the involvement of children or adolescents in sexual activities they do not truly comprehend, to which they are unable to give informed consent, that violate social taboos of family roots and as such are illegal. Recreational and social situations may involve physical contact (e.g. supporting and guiding child/young person/adult at risk) and could potentially create situations where sexual abuse may go unnoticed. Abusive situations occur if adults misuse their power over children. The legal age of sexual consent is 16.

Physical Abuse: Actual or likely deliberate physical injury to a child/young person/ adult at risk or wilful neglectful failure to prevent physical injury or suffering to a child. In recreational activities this might occur where the nature and intensity of activities exceeds the capacity of the child's immature and growing body.

Emotional Abuse: The actual or likely persistent or significantly emotional ill treatment or rejection resulting in severe effects on the emotional, physical, and/or behavioural development of a child/young person/adult at risk. All abuse involves some emotional ill treatment, but emotional abuse is where it is the main or only form of abuse. Emotional abuse in recreational or social activities might also include situations where parents, staff, or volunteer's subject child/young person/ adult at risk to constant criticism, bullying or unrealistic pressure to perform to high expectations.

Bullying: is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – at school, at home, or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Cyberbullying is bullying that takes place online and is defined as the use of ICT by an individual or group in a way that is intended to upset others. (This includes the use of social media, mobile phones, photos and video. Unlike bullying offline, online bullying can follow the child wherever they go, via social networks, gaming, and mobile phone.

For more information about the types of abuse please visit: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

4.4. Good Practice to protect against allegations of abuse

When working with Children/Young People/Adults at Risk, you should avoid spending excessive amounts of time alone with children/young people/ adults at risk away from others.

Further, avoid completely

- Taking children/young people/ adults at risk alone in a car.
- Taking children/young people/ adults at risk to your home.
- Engaging in rough physical activities – apart from structured activities.
- Engaging in sexually provocative activities.
- Showing favouritism/ or dislike to one or more young people.
- Allowing or engaging in inappropriate touching of any form.
- Allowing children/young person to use inappropriate language unchallenged.

- Making sexually suggestive comments about or to a child/young person even in fun.
- Letting an allegation a child/young person makes during a group session go unchallenged or unrecorded.
- Doing things of a personal nature for children/young people that they can do for themselves. Only do things of a personal nature for children/young people (take to toilet, support, give lifts), if you have obtain the full consent of someone in charge of the organisation and the child's parent/guardian/carer in written form.

In an situation, where occasions arise where it is unavoidable that these things could happen, they should be done with the full knowledge and consent of someone in charge of the organisation and the child's parent/guardian/carer.

In an emergency situation, which requires this type of help, parents/guardians/carers should be fully informed as soon as is practicable.

4.5. Suspicions/Reports of Abuse

It is not the responsibility of staff or volunteers to deal with suspected abuse, but it is their responsibility to report concerns in line with guidance on reporting child abuse. You may find that these suspicions back up other recorded incidents. Remember, **do not investigate – do report.**

The following are some key **do's and don'ts** if a child/young person/ adult at risk reports abuse or discloses information to you that may harm them or others:

- Stay calm.
- Tell them that you will have to pass on the details of what they tell you to a responsible person which could be social services and that you cannot keep a secret.
- Let the them tell you their story and do not ask leading questions.
- Record down what they have said.
- Do not judge them or try to give advice.
- Reassure them that they are not to blame and that you will try to offer support.
- Do not rush into details that may be inappropriate.
- Do not take sole responsibility – pass on the information as soon as you can.
- Ask them if this is the first time, they have talked about it and if not have social services been involved.

4.6. Reporting Abuse

Take down useful information such as learning needs and disabilities of the child/young person/adult at risk Tell the child/young person/ adult at risk that they will be able to read what you have written down about them. When reporting choose ONE of the following options:

Option 1 - Digital report

Concordia use the Safeguarding Company as their case management system provider. For digital reporting, you need to complete a form which automatically alert the Designated

Safeguarding team of any disclosures. This is the preferred way ensuring swift actions when/if required.

Link - <http://tinyurl.com/ConcSafeguardingForm>

The DSL will pass the information the specific Social Services Department, who will take over the responsibility to investigate.

If you suspect another adult of being an abuser; record the facts on the Concordia Safeguarding Incident Report Form/digital form, (see Appendix A) and inform the DSL immediately. This will be kept confidential. The DSL must report this directly to the Local Authority Designated Officer (LADO).

If using personal electrical equipment, please make sure that all confidential data is erased once it has been handed over to the DSL, please check it has been removed from the recycle bin, temporary files etc.

Option 2 - Paper form

Fill in the form in Appendix A - Concordia Safeguarding Incident Record Form. Fill in point 1 – 10 and then pass the form on to the DSL ASAP where they will complete the rest of the form and take necessary actions.

4.7. Photography and Interviews

Occasionally, Concordia will take photographs, films or record audio of volunteers, staff and/or young people participation. Formal, written permission should be obtained from parent/guardian for any use of images or quotes of child/young person under the age of 18 or adult at risk. When taking a photo, the focus should be on the activity and not on a specific person.

On all Concordia programmes, a media consent form will be used to obtain consent for media usage.

4.8. Code of Conduct

Before starting any volunteering, training, or farm focussed programme operated by Concordia, or in partnership with other organisations and agencies, including the community and voluntary sector as well as the NCS programme, each staff, volunteers, young people and parent/guardian/carer signs a form to confirm that they agree to abide by the following rules:

- **VIOLENCE:** Physical, emotional, sexual or verbal violence towards anyone on the project will not be tolerated. This includes whether it is towards staff, volunteers, young people or members of the public.
- **DRUGS:** The use of any drug which is not intended as medication (prescribed medicines) for the participant will not be tolerated.
- **ALCOHOL:** staff, volunteers, young people or participants must not consume alcohol whilst on programme.

- **CRIMINAL DAMAGE:** We will not accept any intentional damage caused to property whilst on a volunteering, training or farm focussed programme operated by Concordia,

A service specific code of conduct will be completed between staff and participants on first day of programme. Incorporate the above into the codes of conducts both for staff, volunteers and young people at the start of their programmes. This will include definitions of bullying, and what to look for and what the group will not tolerate during their programme.

4.9. Residential Events and Pick up, drop off arrangements

Where possible on residential settings the child/young person/ adult at risk should sleep in single sex rooms. If the group must sleep in one room, then the leaders must set physical boundaries for where the young people sleep and arrange a male/female area. There also must be a private, single sex area created so that the child/young person/ adult at risk can get changed in.

It is not the responsibility of Concordia to arrange for the child/young person/ adult at risk to travel to and from an allocated pick-up point, or once the child/young person/ adult at risk is dropped off after a residential or end of day programme. However, it is good practice to ask how they will travel home from the pick-up/drop off point. Concordia will have informed parents/guardians/carers of the times and place for these pick up/drop off points and that it is their responsibility to ensure that the young person has an agreed way to travel home. If for any reason Concordia is late with the pick-up/drop off time, then the leader will call the young person and parent/guardian to inform them of the new time.

4.10. Working with people with criminal records

Having a criminal record will not necessarily bar you from working with Concordia. This will depend on the nature of the position and the circumstances and background of your offences.

Please see Recruitment of Ex-offenders Policy.

4.11. Missing Person(s)

If a child/young person/ adult at risk goes missing from any of the youth programmes, at any stage of the programme. Firstly, establish when that person was last seen and where. Ask the rest of the group if they have seen the missing person but please do this in a manner that avoids panic and alarm. Call the young person's mobile phone. Search the accommodation if it is during a residential phase. If the person is still missing, then contact a senior staff member at Concordia. Please write everything down on the incident report form (Appendix A, form 5) or via the digital "MyVoice: Concordia Safeguarding Form". Concordia will contact the parent/guardian/carer of the missing young person and if they feel there is a need, they will call the police and report the person as missing. If this happens on an NCS programme staff must follow the incident procedure set out by the management partner (if any).

Leaders/co-ordinators will need to reassure the rest of the group and carry on the programme as normal. If the child/young person/ adult at risk turns up to the project, call Concordia straight away so they can inform the parents/guardians/carers if they have been informed of

the incident. Concordia will then decide with the parent/guardians/carers/leader to establish if the child/young person/ adult at risk should stay on the programme or not.

4.12. Physical Intervention

If the leaders feel that a child/young person/ adult at risk is putting themselves in danger due to physically harming themselves, others or damaging property, they can ask that person to stop and try to remove any items that might cause harm, as long as they are not putting themselves or others in danger. If this does not work, then call the police and get professional assistance. Concordia does not give training in how to carry out physical intervention on a child/young person/adult at risk, therefore if a leader is put in a situation that physical intervention is needed then they must get professional assistance. If this situation were to occur, once professional help is given the leader must call Concordia to let them know the situation and they must record the safeguarding incident reporting form – See *Appendix A* or via the digital “MyVoice: Concordia Safeguarding Form.”

4.13. Training

The Designated Safeguarding Lead and Designated Safeguarding Officers should undergo training every two years to provide them with the knowledge and skills required to carry out the role.

All Staff working on a Concordia led programme must undergo annual safeguarding training. This includes in-depth training on Safeguarding, Concordia procedures and latest trends. Staff might also, if required, have to complete additional trainings if stipulated in contract agreements.

4.14. Contextual Safeguarding

Contextual Safeguarding recognise that as young people grow and develop, they are influenced by a whole range of environments and people outside their family. For example, in school or college, in the local community, in their peer groups or online. Children and young people may encounter risk in any of these environments. Sometimes the different contexts are inter-related and can mean that children and young people may encounter multiple risks. Contextual safeguarding looks at how we can best understand these risks, engage children and young people and help to keep them safe. It is an approach that’s often been used to apply to adolescents, though the lessons can equally be applied to younger children, especially in today’s changing world.

In order to protect young people, it is useful to think about the following aspects:

The Environment – What is the environment that we run our sessions in and to be aware that young people will also spend their time in other contexts.

Work with others in our community – Keep our eyes and ears open for any changes or anything that is potentially concerning such as in areas that we may use to deliver our programmes including local public space, cafes, and transport hubs, etc. As well as to build good relationships with organisations that support young people and families such as good banks, the police, schools etc.

Start Conversations – Listen to young people and allow safe spaces for them to talk about their experiences. When speaking to Social Services and/or the police ensure that the context

of the young person's disclosure is reported. For example, if they are subjected to abuse, is this in the home, at a friend's house or in a public space?

4.15. Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a type of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, such as gifts, drugs, money or affection, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Working Together to Safeguard Children 2023; p154-155).

Perpetrators of CSE use a power imbalance to exploit children and young people. CSE is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. (Department of Education, Child Sexual Exploitation, 2017).

Child Sexual Exploitation is a hidden crime. Young people have often been groomed into trusting their abuser and may not understand that they're being abused. They may depend on their abuser and be too scared to tell anyone what's happening because they don't want to get them in trouble or risk losing them. They may be tricked into believing they're in a loving, consensual relationship. One of the key factors found in most cases of child sexual exploitation is the presence of some form of exchange (sexual activity in return for something); for the victim and/or perpetrator or facilitator.

Some children and young people are trafficked into or within the UK for sexual exploitation. Please see Concordia's Modern Slavery Policy and Procedure for more information. If you are worried about a young person being a victim of CSE please speak to Concordia's DSL ASAP and follow Concordia's reporting procedures

5. Use of Data

Decisions to share information will be made using case-by-case judgements. In all cases, the safety and welfare of a child, young person or adult at risk will be the overriding consideration. Disclosure of confidential information must be justifiable in each case, according to the particular facts. Concordia will clearly record the reasons why a decision to share or not to share information was made.

Concordia recognise that those holding DSL/DSO roles have a commitment to work together with the external services and partners, sharing relevant and appropriate information with appropriate and relevant staff.

Concordia will keep any records of confidential information for as long as necessary. Concordia will keep information secure and separate from any general records, and only make them accessible to relevant staff.

6. Contacts for Specialist Advice

If you would like any independent or specialist advice or need to report a suspicion out of hours, you can telephone the local Children's Services department and speak to the duty worker. You can also seek expert specialist advice such as the NSPCC 24-hour free phone Helpline, or the Police have specially trained child protection teams who will give guidance and support and deal with enquiries.

All Safeguarding incidents must be reported to Concordia's DSL or DSO.

N.B. Information passed to Children's Services or the Police must be as helpful as possible, hence the necessity for making a detailed record at the time of the disclosure or concern.

Contact Concordia's DSL (Designated Safeguarding Lead) who is Victor Petersson - +44 (0) 7872 117 009 - Victor.petersson@concordia.org.uk

Concordia's DSOs (Designated Safeguarding Officer) are

- Max Bateman. Max.bateman@concordia.org.uk. 07545927551
- Charlotte Whitehead Charlotte.Whitehead@Concordia.org.uk 07918082090

Concordia's board of trustee's link for safeguarding (TSL) is Edlira Alku, edlira.alku@concordia.org.uk, 078 50 528 055

Please note that a member of the Concordia Senior Management team will be responsible for contacting the below services.

West Sussex Safeguarding contacts:

Multi Agency Safeguarding Hub (MASH)
Floor 1,
County Hall North,
Chart Way,
Horsham,
West Sussex,
RH12 1XH

Email: WSChildrenServices@westsussex.gov.uk

Telephone: 01403 229 900 (Monday to Friday between 9.00am and 5.00pm)

Emergency Duty Team (EDT) outside of office hours (5.00pm-9.00am weekdays) or at weekends and bank holidays, please call 033 022 26664. If the Emergency Duty Team line

is unavailable and you need to report an emergency safeguarding concern, please call 07711 769657. Note that this number does not accept texts.

www.westsussexscp.org.uk

<https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/>

Who to report an incident to:

Local Authority Designated Officer (LADO) for West Sussex –
Miriam Williams and Donna Tomlinson
0330 222 6450 (Available 09.00 – 17.00)
LADO@westSussex.gov.uk

Brighton and Hove Safeguarding contacts:

Front Door for Families
C/O Whitehawk Community Hub and Library
179A Whitehawk Road
Brighton
BN2 5FL

Telephone: 01273 290 400
Out of hours: 01273 335 905 or 01273 335 906
e-mail: FrontDoorForFamilies@brighton-hove.gov.uk

Brighton LADO: Darrel Clews –
Tel: 01273 295 643
Mobile: 07 795 335 879
Darrel.clews@brighton-hove.gov.uk / LADOenquiries@brighton-hove.gov.uk

Additional contacts:

Sussex Police Child Protection Team: 0845 6070999
Sussex Police: 101 (Dial 999 only in an emergency)

National Safeguarding Contacts

NSPCC helpline – 0808 800 5000 (Monday to Friday 8am – 10pm and 9am – 6pm weekends)
ChildLine – 0800 1111
Crimestoppers: 0800 55 111
Anti-Terrorism Hotline: 0800 789 321

This safeguarding policy will be reviewed every year. Where there are legislation changes, or a significant incident occurs then the policy will be reviewed more often. The review will be carried out by the Designated Safeguarding Lead. The policy will then be taken to The Board of Trustees for approval.

Appendix A

Concordia Safeguarding – Incident Record Form IN STRICTEST CONFIDENCE WHEN COMPLETED

1. Your Name:	2. Your Position:	
3. Young Person's / adult at risks Name:	4. Young Person's / Adult at Risk's Address:	
5. Young Person's / Adult at Risk's date of birth (DD/MM/YYYY):	6. Parents/carers' names and address:	
7. Leader's name and address:	8. Time and date of incident:	
9. Your Observations:		
10. Record of exactly what the young person / Adult at Risk said and what you said: (remember do not lead the young person / Adult at Risk – record the actual details. Continue on separate sheet/s if necessary). If possible, please include the place/venue/area that this happened.		
Signature of Concordia Staff:	Print Name:	Date:

To be completed by a Concordia Safeguarding Team		
11. Action taken so far:		
12. Does this disclosure involve any digital safeguarding factors? Yes/No (if yes please give a brief statement)		
12. External agencies contacted:		
Police Yes/No – if yes, date and time, name and contact number, serial number if given and details of advice received:		
Social Services Yes/No – if yes date and time, name and contact number and details of advice received:		
Other – agency, date and time, name and contact number and details of advice received:		
13. Concordia senior Management contacted (name(s), contact number, details of advice received)		
14. Have the carers /parents been informed that contact is going to be made with social services: yes/no		
NB: carers / parents should be informed unless to do so could place the young person / Adult at Risk at risk of further harm.		
Signature of Manager:	Print Name:	Date:

Please remember to maintain confidentiality on a need to know basis – do not discuss this incident with anyone other than your manager or those who need to know. Please take advice on this point from your manager if you are uncertain.

Data Protection Act 2018. The personal information recorded above is governed by the provisions of the Data Protection Act 2018 and must only be processed in a manner compatible with that act.

Document Control Sheet:

Document Name:

Issue Number:

Document owner: Victor Petersson

Appendix B: Glossary

The following glossary is based on the Working Together to Safeguard Children 2023: A guide to inter-agency working to safeguard and promote the welfare of children.

Item	Definition
Children	Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.
Young People	A term that Concordia use to denote all children, young people, and adults who directly benefit from its services aged 11 – 18.
Adults at Risk	Aged 18 years or over; who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
Safeguarding and promoting the welfare of children	Defined for the purposes of this guidance as: <ul style="list-style-type: none"> a) protecting children from maltreatment b) preventing impairment of children’s mental and physical health or development c) ensuring that children are growing up in circumstances consistent with the provision of safe and effective care d) Taking action to enable all children to have the best outcomes
Child protection	Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.
Physical abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Emotional abuse	The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of

	<p>exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.</p>
Sexual abuse	<p>Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p>
Child sexual exploitation	<p>Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.</p>
Neglect	<p>The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> a) provide adequate food, clothing and shelter (including exclusion from home or abandonment) b) protect a child from physical and emotional harm or danger c) ensure adequate supervision (including the use of inadequate care-givers) d) ensure access to appropriate medical care or treatment <p>It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</p>
Local authority designated officer (LADO)	<p>County level and unitary local authorities should ensure that allegations against people who work with children are not dealt with in isolation. Any action necessary to address corresponding welfare concerns in relation to the child or children involved should be taken without delay and in a coordinated manner. Local authorities should, in addition, have designated a particular officer, or team of officers (either as part of multi-agency arrangements or otherwise), to be involved in the management and oversight of allegations against people who work with children. Any such officer, or team of officers, should be sufficiently qualified and experienced to be able to fulfil this role effectively, for example qualified social workers. Any new appointments to such a</p>

	role, other than current or former designated officers moving between local authorities, should be qualified social workers. Arrangements should be put in place to ensure that any allegations about those who work with children are passed to the designated officer, or team of officers, without delay.
Designated Safeguarding Lead (DSL)	The Designated Safeguarding Lead is the person appointed to take lead responsibility for child protection issues. They have a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the Local Authority, and training staff on safeguarding.
Designated Safeguarding Officer (DSO)	To support the DSL with implementation of a positive safeguard culture within Concordia.
Trustee Safeguarding Lead (TSL)	Relates to a person on the trustee board who is responsible for ensuring organisational compliance to legislation and external regulators.

Appendix C: Reporting a concern procedure

