Villiers Park Educational Trust
Safeguarding and Child Protection Policy
With effect from September 2026

Definitions
For the purposes of this policy and procedures:

"Child" is anyone under the age of 18.

"Young people" includes children and those aged 18. The Charity will have contact with young people who have reached the age of 18 (and are therefore recognised legally as adults) who are still in full-time education at school or form of secondary education institution including further education college (but not those at Higher Education Institutes). The Charity recognises that these young people are still in need of protection and may be vulnerable. The safeguarding obligations in this Policy apply to young people in the same way as to children and references to children should be taken to include "young person" unless otherwise stated or clarified in this Policy. When working with "young people" on the SEND register, the definition is extended to those aged 25, up to their 26th birthday.

"Worker" is any freelance contractor, person seconded for a fixed term from another organisation, tutor, or temporary agency staff who is paid to undertake work on behalf of the Trust which brings them into contact with children or young people.

"Staff member" is any worker or employee of Villiers Park.

"Volunteer" is anyone who is contributing to Villiers Park's programmes or activities on a voluntary basis, for example a trustee, an alumni volunteer, a speaker or a staff member from a partner organisation.

In line with the statutory guidance set out in Working Together to Safeguarding Children 2026, safeguarding is defined as:

- *providing help and support to meet the needs of children as soon as problems emerge;*
- *protecting children from maltreatment, whether that is within or outside the home, including online;*
- *preventing impairment of children's mental and physical health or development;*
- *ensuring that children grow up in circumstances consistent with the provision of safe and effective care;*
- *promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children;*
- *taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.*

1. Policy Statement

Villiers Park Educational Trust ('Villiers Park') carries out activities which bring our employees and people working or volunteering on behalf of our organisation into regular contact with children and young people. Villiers Park believes that a child or young person should never experience abuse or harm of any kind. We recognise and respond to all types of harm, including abuse, bullying, child criminal exploitation, child sexual exploitation, female genital mutilation, grooming and harmful sexual behaviour, harassment, neglect, radicalisation, trafficking misinformation, disinformation and conspiracy theories.

We will give equal priority to keeping all children and young people safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. Effective safeguarding emphasises early intervention, protection from harm (both online and offline), and promotes the best outcomes for all children. Safeguarding children and protecting those who come into contact with the charity is everyone's responsibility.

The Trustees of Villiers Park have a legal duty to act prudently and in the best interests of children and young people and the purpose of this policy is to ensure that all reasonable steps are taken to protect them and keep them safe. The Trustees are aware of their responsibilities. They ensure that adequate safeguarding policies and procedures appropriate to the work of Villiers Park are in place, effectively implemented and kept under regular review. The Trustees will appoint a Designated Safeguarding Trustee. They will review this Policy and provide advice and guidance should a safeguarding incident occur. They will also liaise with the CEO and Chair of the Board to ensure necessary action has been taken, and Villiers Park's reporting obligations have been complied with, including to the Charity Commission, as needed.

This policy provides staff members and volunteers whose duties bring them into contact with children and young people with the overarching principles that guide our approach to safeguarding and child protection. The policy refers to all such people regardless of gender, ethnicity, disability, sexual orientation, religion/belief and age. Failure to comply with this policy will result in disciplinary action (for employees), and termination of the contract or engagement (for workers or volunteers).

Villiers Park recognises that:

- The welfare of the child is paramount, as enshrined in the Children's Act 1989
- All children (regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity) have a right to equal protection from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

We will seek to keep children and young people safe by:

- Valuing them, listening to and respecting them, and taking all concerns seriously
- Appointing a Designated Safeguarding Lead (DSL) for children and young people and a team of Deputy Designated Safeguarding Leads
- Ensuring that we provide a safe physical environment for our children, young people, staff and volunteers by applying health and safety measures in accordance with the law and regulatory guidance
- Adopting child protection and safeguarding practices through agreed procedures and a code of conduct for staff, workers and volunteers
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Providing effective management of staff and volunteers through supervision, support, training and quality assurance measures
- Recording and storing information professionally and securely, and sharing safeguarding and good practice with children, their families, staff and volunteers via our website, posters and one-to-one discussions
- Using our safeguarding procedures to share concerns and relevant information with schools and other relevant agencies, and involving children, young people, families and carers appropriately
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that our policy and procedure will help us to deal effectively with any bullying that does arise
- Ensuring that we have effective complaints and whistleblowing measures in place

All employees, workers and volunteers at Villiers Park will be made aware of this policy, which will be referenced in the Staff Handbook and the codes of conduct for staff and volunteers. This policy will be given to all relevant partners and organisations with whom we work, if requested, and will be made available via our website. Any concerns about this policy or people involved should be addressed to the CEO of Villiers Park.

1.1 Confidentiality

All information regarding young people is highly confidential and should only be shared with appropriate people on a need-to-know basis. However, fears about sharing information must not prevent us promoting the welfare and protecting the safety of those at risk. All information must be stored in accordance with the Data Protection Act (2018) and Villiers Park's Data Protection Policy.

Where safeguarding information is received from partner schools, including information shared through mechanisms such as Operation Encompass, Villiers Park will use this information to inform safeguarding decisions and support.

1.2 Implementation, monitoring and review of this policy

The Trustees have overall responsibility for implementing and monitoring this policy. The policy will be reviewed at least annually and also whenever there are relevant changes in legislation/regulatory guidance and/or to our activity or our working practices. Updates to this policy will be approved by the Trustees before being shared with staff, volunteers and relevant stakeholders.

The Safeguarding Team will meet monthly to monitor the effective implementation of this policy, for example by reviewing samples of risk assessments, causes for concerns and incident logs. Should any deficiencies or weaknesses in safeguarding arrangements be identified, these will be remedied without delay and the policy updated accordingly.

1.3 Breach of this policy

Failure to follow the guidelines in this policy is considered a serious offence and will be investigated thoroughly and dealt with through our staff or volunteer disciplinary procedures. Serious breaches may lead to dismissal and/or termination of contract/engagement.

1.4 Contact Details for the Villiers Park Safeguarding Team

Designated Safeguarding Lead (DSL) and Assistant Director Future Leaders Programme. Lead for Swindon, Norwich & Cambridgeshire Hubs
Name: Julie Kiddier
Mobile: 07795 503584
Email: jk@villierspark.org.uk

Head of Programmes and Deputy Designated Safeguarding Lead (DDSL)
Name: Sarah Chick
Phone: 01223 872601
Email: sarah.chick@villierspark.org.uk

Deputy Designated Safeguarding Lead (DDSL) and lead for Hastings and Bexhill & Tyneside Hubs
Name: Alex Grant, Assistant Director of Partnerships and Evaluation
Mobile: 07920 785155
Email: ag@villierspark.org.uk

Deputy Designated Safeguarding Lead (DDSL)
Name: Max Bruges, Assistant Director of Innovation and Digital Programmes
Mobile: 07593 021212
Email: max.bruges@villierspark.org.uk

Deputy Designated Safeguarding Lead (DDSL)
Name: Gaby Sumner, Chief Executive
Email: gaby.sumner@villierspark.org.uk

Designated Safeguarding Trustee
Name: Mumin Humayun
Email: M.Humayun@thesharedlearningtrust.org.uk

Villiers Park is committed to reviewing our policy and good practice annually. This policy was last reviewed in September 2026

Signed: G. Sumner

Role: Chief Executive

2. Safeguarding and Child Protection Procedures

2.1 Staff and Volunteer Recruitment

Applications for any employees at Villiers Park must always be completed on the organisation's application form. A CV should only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment. Online searches will be carried out on shortlisted candidates, and they will be advised of this in advance.

All workers and volunteers who undertake a role which is defined as regulated activity and greater than the permitted three days in a 30-day time period or involves an overnight stay are required to undertake an Enhanced Disclosure and Barring Service check with Child Barred List check. The specific level of DBS check required for each staff, worker or volunteer role will be determined by following the eligibility guidance / eligibility checking tool on the DBS website. Once agreed, this should be clearly included in the role description when the role is advertised. If any external party attends an event in a school or other setting without a DBS check they will not be left alone or unsupervised with young people.

2.2 Staff and Volunteer Training

As part of their induction, all staff must be provided with a copy of the Safeguarding and Child Protection Policy and must read and familiarise themselves with it. A briefing is also provided to each new staff member by the Designated Safeguarding Lead. All staff must undertake NSPCC E-learning: *Safeguarding in schools, academies and colleges* and Home Office E-learning: *Prevent Duty*. During their induction, staff will be instructed on their safeguarding and child protection responsibilities and the procedures to be followed if they have concerns about a young person's safety or welfare, as outlined in this document. Regular updates and training will be provided during the year to all staff where relevant. The Designated Safeguarding Lead and Deputy DSLs will undertake formal safeguarding training at least every two years and will update their knowledge and skills through regular updates and relevant training at least annually. All recruitment and interview panels must include at least one member of staff who has completed the NSPCC Safer Recruitment in Education training course.

As part of their induction, all volunteers must be provided with a copy of the Safeguarding and Child Protection Policy and the Volunteer Code of Conduct. They must confirm in writing that they have read and familiarised themselves with this documentation. Regular updates and training will be provided during the year to volunteers where relevant. All Trustees are required to complete Safeguarding training every two years. In addition, regular updates and training will be provided during the year when relevant, alongside termly reports from the Designated Safeguarding Lead.

2.3 Health and Safety and Risk Assessment/Management

The safety of everyone we work with is paramount and we are committed to providing a safe environment within which to work, as set out in our Risk Policy. All activities, in-person and online, involving young people, must be planned to ensure they consider the age range and ability of the participants and a risk assessment for each activity must be produced and approved in advance. The risk assessment provisions must take account of the age, gender and any specific individual needs of participants, as well as the nature of the activity. Young people are entitled to the same respect as any staff or volunteers. It should also be made clear to young people what standards of behaviour and mutual respect are expected from them, as set out in the relevant programme participant Code of Conduct.

Consent from parents/carers must be obtained before a young person takes part in any activity, as well as information required to ensure their safe participation in the activity, for example dietary requirements, disabilities/medical conditions or other issues. If a participant discloses a pre-existing condition or disability in their onboarding forms or if there is a known safeguarding issue, consideration should be given to whether individual risk assessment, adjustment plan and/or personal emergency evacuation plans should be completed for them ahead of them joining any activities. These would be completed in conjunction with the individual, the relevant school/college and with parents/carers as appropriate.

Staff or volunteers who are teaching, supervising and working with young people must be competent and trained to do so. Staff and volunteers working on the activity work together to ensure all individuals are kept safe and are not discriminated against.
Volunteers should notify a member of Villiers Park staff as soon as possible if they see, hear or feel that there is any cause for concern involving a young person.

As part of our risk assessment process, when young people on our programmes attend off-site activities or activities that Villiers Park is facilitating their participation in but not directly organising, specific arrangements for child protection and safeguarding will be clarified in the risk assessment.

For in person events, all staff and volunteers must be provided with an ID card or name badge which clearly identifies them and their role. For virtual events, all staff and volunteers must clearly add their full name using the online platform software.

If an accident or incident occurs during any in-person on virtual event or activity, this must be reported as soon as possible in line with Villiers Park's Safeguarding Policy, Health and Safety Policy and procedures.

2.4 Physical Contact

Staff and volunteers should avoid unnecessary physical contact. Any physical contact must be appropriate, proportionate, in the child's best interests and consistent with safeguarding principles.

If a young person is hurt or distressed, you should do your best to comfort or reassure the affected person without compromising their dignity or doing anything to compromise your own behaviour.

Villiers Park staff and volunteers will respond only to child-initiated contact on a pre- arranged basis at public events. When Villiers Park staff are engaged in a celebratory event or networking event, we recognise that there is an accepted social convention for handshakes. In this case we will communicate with participants at the start of the event and ask them to indicate their willingness to reciprocate by offering their hand or not on approach to the person or by letting us know before the event.

2.5 Ratios and Lone Working

In one-to-one coaching, the session should take place in a space where the staff member and the young person can both be seen by other adults (e.g. in a public space, through the glass panel of an office door, through an open door). If this is not possible the session should be rescheduled or attended by a second adult. If it is an online coaching session or an online facilitated activity involving a young person aged 19 years and under all adults engaging in regulated activity must have a satisfactory and current Enhanced DBS certificate with child barred list check. The coaching session or activity should not take place until this is the case. If breakout rooms are to be used the same conditions apply for every breakout room. All online sessions should be set up in advance on a Villiers Park-approved platform and details of the login details stored centrally. All online sessions must be recorded and stored securely. Prior written consent to online activity and session recording should be sought from parent/care of young people.

During activities other than coaching, staff or volunteers should avoid working alone with a young person wherever possible. Delivery should be planned so that at least two adults are present at any time as far as possible, including an adult with an Enhanced DBS and child barred list check. Any volunteer who doesn't need a DBS for their role must be supervised when around young people at all times by someone who does.

Staff or volunteers should never transport a young person(s) in their private vehicle except in exceptional circumstances and only on the authority of their line manager. In such circumstances they must ensure they have appropriate business insurance for the vehicle, and they must be accompanied by another responsible adult who should be a member of staff from Villiers Park or the young person's school/college.

2.6 Photography, video and images

Only designated staff of Villiers Park are permitted to take photographs and videos of young people on our programmes. Photographs and videos should only be taken on a device owned and/or authorised by Villiers Park unless exceptional permission has been granted.

To protect young people, we will:

- seek parent/carer consent and/or, if over 16 years, the consent of the young people before photographs and videos are taken or published (for example, on our website, social media or other publications including third party organisations)
- never allow organisations working with us to take photographs for their own use without the written consent of the parent/carer or students
- Always explain what the images will be used for, how they will be stored and for how long, and any potential risks
- Have a clear process for parents/carers or young people to remove their consent if they no longer want their image to be shared
- Review our Photography and Video Policy regularly.

2.7 Conduct and communication

Staff are expected to follow our Staff Conduct Policy and volunteers are expected to follow our Volunteer Code of Conduct at all times.

Those working with young people must be respectful and non-discriminatory, behave appropriately, be a good role model, ensure that their language is appropriate and must refrain from adult jokes or inappropriate comments, even in jest.

Contact must not be made with any of the young people with whom we are working for any reason unrelated to Villiers Park. In particular, staff and volunteers are required to do everything to maintain our reputation for integrity and responsibility in dealing with young people and must not enter into any social or other non-work-related arrangements with them.

Staff should keep any communications with young people transparent and professional. All communication with young people should be done via Villers Park-approved platforms or via the shared Programmes Team inboxes - *programmes@villierspark.org.uk*. This email address is monitored by the Head of Programmes and the Assistant Directors of Programmes. If sending out a group email the students' email addresses should be inserted in the Bcc box. Staff and volunteers must never share any of their personal contact details (email, phone number or social media accounts) with young people.Staff are prohibited from making 'friends' or facilitating private connections on social media platforms with the young people we work with because this could potentially be construed as 'grooming', nor should they accept invitations to become a 'friend' of any young person.

Staff and volunteers should never contact a young person by mobile telephone unless in a crisis or emergency and only as a final resort i.e. a young person does not arrive back to a meeting point during an off-site visit. If an employee has to contact a young person on their mobile telephone, they should first ask the permission of their line manager and have a witness whilst making the call. A follow up message to the relevant young person(s) should be sent to confirm that the telephone conversation took place and why. Failure to follow this procedure will lead to disciplinary action.

2.8 Gifts and inducements

On no account should anyone from Villiers Park give or receive a gift to or from a young person a gift, for example, which could be in any way considered as a bribe or inducement to enter into a relationship or give rise to any false allegations of improper conduct against the individual.

2.9 Working within a school/college setting

When working with children from a school, staff should familiarise themselves with the relevant school's safeguarding policies and procedures and act in compliance with them.

Villiers Park will ensure appropriate filtering and monitoring arrangements are in place on organisational devices and networks used by staff and volunteers. Arrangements will be reviewed annually and concerns arising from filtering and monitoring systems will be escalated to the DSL.

When accessing a school or college's IT system, staff and volunteers should be aware of the school or college's filtering and monitoring system and should never be accessing inappropriate content. If they are aware that inappropriate content is being or has been accessed by anyone (including themselves, a student or a third party in a school), they should escalate this to the Designated Safeguarding Lead immediately.

3. Management and Retention of Records of Concerns and Data Protection

3.1 Sharing Information

Information regarding a safeguarding query, concern or allegation is only disclosed to on a strictly 'need-to-know' basis. Staff and volunteers must follow the charity's Data Protection Policy but will also have due regard to guidance included in 'Information Sharing – Advice for safeguarding practitioners. Villiers Park understands that information sharing is essential for effective safeguarding and promoting the welfare of children. Fears about sharing information will not stand in the way of the need to promote the welfare and protect the safety of children. Villiers Park will cooperate with relevant statutory authorities and ensure that relevant information is shared with them for the purposes of their statutory assessments / purposes.
Where safeguarding information is received from partner schools, including information shared through mechanisms such as Operation Encompass, Villiers Park will use this information to inform safeguarding decisions and support

3.2 Retention of Records of Concerns of Abuse towards a Young Person

All data relating to safeguarding, including personal data, will be handled in accordance with the Villiers Park Data Protection Policy. All concerns and incidents involving a young person should be recorded in writing on the relevant form from the DSL at Villiers Park and/or the school/college and returned to the named individuals. Villiers Park has a designated and secure SharePoint Channel site for storing confidential and sensitive information, which is only accessible by the DSL and the Deputy DSLs. In line with NSPCC guidance, records of any concerns and incidents will be kept until the young person reaches the age of 25.

3.3 Retention of Records of Concern about an Employee or Volunteer's Behaviour towards a Young Person

Records relating to concerns or allegations about an employee or volunteer will be kept in the person's confidential personnel file and a copy given to the individual. Records will be kept until the person reaches retirement age or for 10 years whichever is longer.
Records will be kept for the same amount of time even if the allegations were unfounded or if the person leaves the organisation. If the allegations are malicious, they will be destroyed immediately. Should any allegation be made against the CEO, the Designated Safeguarding Trustee will receive the allegation and consult with the Chair of Trustees to ensure necessary action is taken.

4. Supporting Employees and Volunteers

If a staff member or volunteer is affected by any safeguarding incident, disclosure or abusive behaviour they have witnessed, they should discuss this with the DSL and/or their Line Manager who will offer advice and guidance on how to receive appropriate support. This may include use of the Villiers Park Employee Assistance Programme and support offered by specialist organisations or charities (see below). The DSL or Deputy DSLs are always available if you have a question or query which relates to safeguarding, even if you are not sure whether it constitutes an allegation or concern.

5. Safeguarding Concern Reporting Process

5.1 Becoming aware of concerns/allegations/disclosures

A safeguarding allegation, concern or disclosure could be anything relating to a child's or adult's safety or welfare. Or it could be about the potential risk a person may pose to others.

Ways in which a concern might be brought to your attention might include:

- A young person might make a direct disclosure about themselves
- A young person might make a direct disclosure about another young person
- A young person might offer information that is worrying but not a direct disclosure
- You might be concerned about a young person's appearance or behaviour
- You might be concerned about the behaviour of an adult towards a young person
- An adult might make a disclosure about abuse that a young person is suffering or is at risk of suffering
- An adult may offer information about a young person that is worrying but not a direct disclosure
- We are made aware that student is no longer on the school roll
- A disclosure may also come in written form, for example on an activity sheet or an end of event/workshop survey

Remember you should report anything that's making you feel concerned without needing to identify the specific type of abuse or harm that's taking place.

5.2 Action to take

1. *If there is immediate danger or a medical emergency, you should seek help from another member of staff or staff such as security personnel if available:*
    - If the young person is with you, remain with them and call the police
    - If the young person is elsewhere, contact the police and explain the situation
    - If the young person needs medical attention, call an ambulance and while waiting for it to arrive get help from a first aider
    - As soon as practical, contact your line manager or one of the Villiers Park DSLs for help and support

2. *If someone starts to disclose information to you:*
    - Remain calm, approachable and receptive. Try not to panic, make assumption or be judgemental.
    - Listen carefully without interrupting and trust what is being said.
    - Be understanding and reassure them that they have done the right thing. Do not try to investigate or quiz the individual but make sure that you are clear about what they are saying.
        - The TED acronym is a useful way to remember how to ask open questions: **T**ell me a bit more, **E**xplain, **D**escribe.
        - You can also reflect back key phrases of what has been said, to check your understanding is correct.

- Tell them that you now have to do what you can to support them and keep them (or the person they are disclosing information about) safe.
- Let them know what you are going to do next and that you will need to inform people who can help – initially one of the Villiers Park DSLs.
- **Never promise confidentiality. Also remember that it is NOT our responsibility to investigate the concern – this requires expertise we are not expected to have, our role is to report only.**

If a young person discloses personal information to you or you have any safeguarding concern, it is your responsibility to report it to one of the Villiers Park DSLs as soon as possible and no later than the end of the working day wherever possible. You can also contact the DSL by phone if you need immediate assistance. Remember that you should not discuss the concern or disclosure with people who don't need to know about it, including other colleagues/volunteers.

5.3 How to report and record a concern or disclosure

You must report any concerns involving a Villiers Park staff member or volunteer, or young people who are registered on a Villiers Park programme or attending a Villiers Park event or activity, to the Villiers Park safeguarding team. If you're attending an activity or event off-site or the concern involves an individual connected with another organisation, there may be other reporting processes in place. Please refer to Villiers Park's DSL for instruction.

1. Please use the reporting link on our all staff safeguarding channel - Safeguarding - Cause for Concern Form – Fill in form
2. Or, if you are at an event, please locate your Regional Lead or DDSL who will have paper copies available.
3. Complete the form with as much factual information as you can. Record exact words or phrases, if possible, try to give as much detail as you can and note if there is any relevant evidence.
4. If you need support with a safeguarding concern, please contact the relevant staff as below

Hastings and Bexhill Hub	Deputy Designated Safeguarding Lead Assistant Director Partnerships and Evaluation – Alex Grant (if unavailable– Julie Kiddier)
Swindon and Wiltshire Hub Norfolk Hub Cambridgeshire Hub	Designated Safeguarding Lead Assistant Director, Future Leaders Programmes– Julie Kiddier (if unavailable – Alex Grant)
Tyneside Hub, online Programmes and Non-Future Leaders Leadership Challenge	Deputy Designated Safeguarding Lead Assistant Director, Digital and Innovation – Max Bruges (if unavailable – Alex Grant or Julie Kiddier)
Any other Villiers Park staff or volunteers External contacts General public	Head of Programmes – Sarah Chick (if unavailable –Julie Kiddier or Alex Grant)

If none of the staff listed above are available, please contact Gaby Sumner, CEO.

5. The DSL will review the Cause for Concern form and decide on the next steps. This will depend on a range of factors, including the type, complexity and severity of the concern, as well as the people involved. This may involve reporting the concern to the DSL at the relevant school/college and/or to external agencies such as the local authority social services team, or in the case of an allegation against a Villiers Park staff member or volunteer, reporting it immediately to the CEO. If letting parents or carers know about the report will put a child at further risk of harm, the DSL may make a referral without seeking their consent first.

6. The DSL will record on the Cause for Concern form the action that has been taken and response(s) received from the relevant school/college or any external agency to which information has been referred.
    a. For urgent concerns, follow up is required after 24 hours if no response has been received and should be escalated to the Headteacher/Principal or Local Authority if no response is forthcoming.
    b. For low-level concerns, follow up is required after seven working days if no response has been received.
    c. Where we are made aware a student is no longer on School/College roll the DSL will phone parent/carers to confirm this and ensure that we are satisfied that the student is safe.
7. The DSL will save the safeguarding report in a secure Teams site, anonymise the information and save it onto the central Villiers Park Cause for Concern Central Log.
8. Villiers Park maintains clear safeguarding cover arrangements whenever the DSL is unavailable. A shared safeguarding email account is monitored to ensure concerns can be received, reviewed and acted upon within 24 hours.
9. Any queries on our safeguarding policy or processes can be directed to DSL Julie Kiddier, via safeguarding@villierspark.org.uk.

6. Adult Safeguarding

Definitions

Participant/student refers to individuals that take part in Villiers Park programmes. Some participants will have reached the age of 18 and are therefore legally adults who are still in full-time education at school or form of secondary education institution including further education institute (but not those in a Higher Education Institute). The safeguarding obligations in this Policy apply to participants/students in the same way as to children and references to children should be taken to include "young person" unless otherwise stated or clarified in this Policy

Vulnerable Adults are those people over 18 years who are or may be, for any variety of reasons, unable to look after themselves or protect themselves from harm or exploitation. We do not actively work with vulnerable adults; however, we may encounter vulnerable adults via their relatives who may be part of our programmes. In these cases, we will follow the local authority guidelines.

Please also see Villiers Park's SEND safeguarding policy and procedures.

6.1 Concerns and Allegations Relating to Adults

An 'allegation of harm' is where it is alleged that a person has or may have behaved in a way that meets the harm threshold as specified below:

- behaved in a way that has harmed or may have harmed a child or adult at risk;
- possibly committed a criminal offence against or related to a child or adult at risk;
- behaved towards a child or children or adult/s at risk in a way that indicates they may pose a risk of harm to children or adults at risk;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk (this behaviour includes inside and outside of the workplace).

If a cause for concern involves an allegation against an adult staff member or volunteer (whether current or historic, from Villiers Park or another organisation), the DSL must refer the cause for concern to the CEO immediately for action. Once the concern has been shared, the determination about thresholds and appropriate action should be made by the CEO, who will consider what information needs to be gathered and how it should be obtained. They may consult the DSL, our external HR specialist and/or seek advice from the Local Authority Designated Officer (LADO) to determine next steps.

In the case of an allegation involving an adult in a position of trust with another organisation, the CEO should follow that organisation's reporting process to raise the concern and/or contact the Local Authority Designated Officer (LADO) in the relevant local authority for advice, as they are responsible for giving advice and guidance on allegations and concerns about adults working with children.

The subject of the allegation will be informed as soon as possible, treated with respect and fairness throughout and be kept informed about the process, as well as support and guidance available to them. Principles guiding any internal investigation process will include fairness, transparency, the need to establish facts, confidentiality and a clear process, documented throughout. Once an internal investigation has taken place and a course of action decided upon, the person in question will be informed of the outcome. In the instance that an employee or volunteer is dismissed or has their contract / engagement terminated because they pose a risk of harm to children, a referral may be made to the Disclosure and Barring Service who will consider whether to add the individual to the barred list.

A 'low-level concern' refers to concerns that do not meet the harm threshold above and/or would not be serious enough for referral to the Local Authority Designated Officer (LADO), but this does not mean they are insignificant.

A low-level concern is any concern that an adult has behaved in a way that is inappropriate, not in line with expectations and not consistent with the Villiers Park Staff or Volunteer Code of Conduct and low–level concerns policy.

6.2 Reporting a Concern about Adult behaviour

A standard reporting form is accessible via digital and paper format.

Submitted forms will be assessed by the DSL and the CEO will be immediately informed. Further investigations and referrals to statutory authorities will be made in line the policies referenced below.

For further information please refer to

- Low-Level Concern Policy

Internal Disagreements
If there is disagreement amongst staff or volunteers at Villiers Park over how a concern is being dealt with, the situation must be brought to the attention of the CEO.

Professional Disagreement
If the Safeguarding Team at Villiers Park is not satisfied with a response from a school/college and they are convinced the incident or issue is a safeguarding concern it should be escalated to the local authority.

Concerns regarding the Villiers Park Safeguarding Team
If you have a concern about one of the Deputy Designated Safeguarding Leads, you should report your concern to the Designated Safeguarding Lead, Julie Kiddier (jk@villierspark.org.uk) directly.

If you have a concern about the Designated Safeguarding Lead, you should report your concern to the CEO directly.

If you have a concern about the CEO, you should report your concern to the Designated Safeguarding Trustee directly.

If you are concerned about how safeguarding or child protection issues are being handled, you can also follow the Villiers Park Whistleblowing Policy to raise your concerns.

7. Related Villiers Park Policies and Procedures

- Anti-Corruption and Bribery Policy
- Anti-Harassment and Bullying Policy
- Data Protection Policy
- Health and Safety Policy
- IT and Computer Use Policy
- Grievance Procedure
- Mental Health and Wellbeing Policy
- Privacy Policy
- Lone Working Policy
- Low Level Concern Policy
- Photography and Video Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Staff Disciplinary Procedure
- SEND Policy
- Social Media Policy
- Substance Misuse Policy
- Using Your Own Vehicle For Work Policy
- Volunteer Code of Conduct
- Whistleblowing Policy

8.Contact details of relevant support organisations

- NSPCC Advice 0808 800 5000 (10am-8pm, Monday-Friday) / nspcc.org.uk
- Local Children's Safeguarding Partnership – for advice and guidance on all child protection issues. Contact details can be found on Local Authority websites.
- Local Authority Designated Officer (LADO) - for advice and guidance on allegations about an adult who is working with children and young people. Contact details can be found on each Local Authority's website.
- Health Assured Employee Assistance Programme for Villiers Park staff
- BEAT (support for those with eating disorders) 0808 801 0677 / beateatingdisorders.org.uk
- Brook (support for sexual health and wellbeing) brook.org.uk
- Childline 0800 11 11 / childline.org.uk
- Cruse Bereavement Care 0808 808 1677 / cruse.org.uk
- Carers UK 020 7378 4999 / carersuk.org
- Young Minds 0808 802 5544 / youngminds.org.uk
- Refuge (for women and children against domestic abuse) 0808 2000 247 / refuge.org.uk
- Samaritans 116 113 / samaritans.org.uk
- Self Harm UK selfharmuk.co.uk
- Stonewall stonewall.org.uk
- The Child Exploitation and Online Protection Command (CEOP) ceop.police.uk
- Victim Support 0808 1689 111 / victimsupport.org.uk

APPENDIX 1: Relevant Legislation

There is a considerable body of legislation designed to ensure that children are protected and it is important to understand that everyone is responsible for the safety of children.

The main acts, policies and guidance include:

- Keeping Children Safe in Education (2026) (Statutory Guidance) (Updated)
- Working together to safeguard children (2026) Statutory Guidance) (Updated)
- After-school clubs, community activities and tuition: Safeguarding guidance for providers (2023) (Statutory Guidance)
- Safeguarding Duties for Charity Trustees (2022) (Statutory Guidance) (Updated)
- Prevent Duty Guidance: England and Wales (2024) (Statutory Guidance) (Updated)
- Information Sharing advice for safeguarding practitioners (Statutory Guidance) (2026)
- Sharing nudes and semi nudes: advice for education settings working with children and young people (2024)
- Protection of Children Act 1999
- Health and Safety at Work Act 1974
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006
- Children and Young Persons Act 2008
- Education Act 2011
- Children and Families Act 2014
- Children and Social Work Act 2017
- Equality Act 2010

APPENDIX 2: Safeguarding Issues

A.1 Abuse

Child abuse as in defined in full: Keeping Children Safe in Education 2026

What is abuse?
All staff and volunteers have a strict duty never to subject any young person to any form of harm or abuse. This also applies to any issues or incidents between young people. There are four types of abuse*: physical, emotional and neglect sexual.*

Physical abuse*: physical injury to a child where there is knowledge, or a reasonable suspicion, that their injury was inflicted or knowingly not prevented*
Neglect*: the persistent or severe neglect of a child which results in serious impairment of the child's health or development (both physical and mental)*
Emotional*: the persistent or severe emotional ill treatment of a child which has severe adverse effects on the behaviour and emotional development of a child*
Sexual abuse: *the involvement of dependent, developmentally immature children and adolescents in sexual activities they do not truly comprehend, to which they are unable to give informed consent. This doesn't have to be physical contact, and it can happen online.*

Children potentially at greater risk of harm
Whilst all children should be protected, it is important to recognise that some groups of children are potentially at greater risk of harm than others. The list below is not exhaustive, but highlights some of those groups.

- **Children who need a social worker** (Child in Need and Child Protection Plans). Children may need a social worker due to safeguarding or welfare needs such as to abuse and/or neglect and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.
- **Children absent from education** This can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to children missing from education supports identifying such abuse and helps prevent the risk of them going missing in the future.
- **Elective Home Education** (EHE) Many home-educated children have an overwhelmingly positive learning experience. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.
- **Children requiring mental health support**. Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- **Looked after children** The most common reason for children becoming looked after is as a result of abuse and/or neglect.
- **Care leavers** Local authorities have on-going responsibilities to the children who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training.
- **Young Carers**
  Schools and colleges should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing.
- **Children with medical conditions**
  A safeguarding concern may arise where an incident/disclosure highlighted that the child or young person might be at increased risk of being neglected, abused or exploited by persons

inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, college or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

- **Children who are lesbian, gay or bisexual** The fact that a child or a young person may be lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, children who are lesbian, gay or bisexual can be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who identify as lesbian, gay or bisexual.
- **Children who are questioning their gender**
  In recent years, we have seen a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.
  It is not for schools and colleges to initiate any action in this area: guidance (KCSiE 2026) is focused on circumstances where a child or their parent has raised a request relating to social transition to which a school or college is responding.
- Villiers Park staff should not adopt any changes relating to social transition unless a decision has been made by a school or college in accordance with statutory guidance and this has been officially communicated to Villiers Park via our School Liaison or Designated Safeguarding Lead.
- Any records of personal information should record sex at birth

Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual making and sharing of nude and semi-nudes, photographic, video or livestreamed can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

Bullying and Cyber Bullying

Bullying is behaviour by an individual or group, repeated over time that intentionally hurts the victims either physically or emotionally. Bullying can take many forms and is often motivated by prejudice against a particular group, for example, on grounds of race, religion, background, physical disability or medical conditions.

All forms of bullying are unacceptable, including bullying that happens online. Technology is a significant component in many safeguarding and wellbeing issues.

Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or 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.

Child-on-Child Abuse (including harassment and violence)

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. If a member of staff is aware that a child or children may be at risk from child-on-child abuse, they must follow the usual procedure for reporting a cause for concern immediately and speak to the DSL. This is important in order to prevent it happening or continuing.

It is essential to understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" can lead to a culture of unacceptable behaviours and an unsafe environment for children and young people.

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 children
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise
- causing physical harm (this may include an online element which threatens and/or encourages physical abuse)
- serious physical assault and harm, or the threat of harm with a weapon,
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual making or sharing of nude and semi-nude images.
- 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, and,
- 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 Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and for further information is available in Modern Slavery Statutory Guidance (2026).

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. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

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

Child Sexual Exploitation (CSE) is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching inside clothing. It may include contact or noncontact 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 undertake 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.

Domestic Abuse
Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Honour or Faith-based abuse (including female genital mutilation and forced marriage)
Whilst all staff should speak to the Designated Safeguarding Lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers and educators. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Forced Marriages
Forcing a young person into a marriage before their eighteenth birthday is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). This applies to non-binding, unofficial 'marriages' as well as legal marriages. Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

Radicalisation

Radicalisation can be very difficult to identify. Children and young people can be radicalised in different ways:

- groomed either online or in person by people seeking to draw them into extremist activity. Older children or young people might be radicalised over the internet or through the influence of their peer network – in this instance their parents might not know about this or feel powerless to stop their child's radicalisation;
- groomed by family members who hold harmful, extreme beliefs, including parents/carers and siblings who live with the child and/or person(s) who live outside the family home but have an influence over the child's life;
- exposed to violent, anti-social, extremist imagery, rhetoric and writings which can lead to the development of a distorted world view in which extremist ideology seems reasonable. In this way they are not being individually targeted but are the victims of propaganda which seeks to radicalise.

A common feature of radicalisation is that the child or young person does not recognise the exploitative nature of what is happening and does not see themselves as a victim of grooming or exploitation.

Signs that may indicate a child being radicalised include:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use.

If you are concerned that a child or young person may hold extremist views or are at risk of being radicalised, it important to follow the PREVENT guidance to ensure they receive support to protect them from being drawn into terrorism.

Online Abuse

While acknowledging the benefits of social media and the internet, it is also important to recognise that risk to the safety and well-being of users is ever-changing and that the misuse/abuse of these facilities can range from inappropriate to criminal.

Online abuse is any type of abuse that happens on the internet, across any device that is connected to the web, including computers, tablets or mobile phones. It can include cyberbullying, emotional abuse, grooming, sexting, sexual abuse and sexual exploitation. It can happen in any online space including social media sites, in text messages and messaging apps, emails, online chats or online gaming/streaming sites. Children can be at risk of online abuse from people they know and from strangers. It might happen alongside other abuse, or just online.

A child or young person experiencing online abuse might:

- spend a lot more or less time than usual in online spaces
- seem distant, upset or angry after using the internet
- be secretive about what they are doing online or who they are talking to
- have lots of new phone numbers or contacts on their devices

Serious violent crime

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

Serious Violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to so) to the School/College safeguarding lead or deputy.

A.2 Mental Health and Wellbeing of Young People

The mental health and wellbeing of young people is an important aspect of safeguarding. Young people can experience behavioural or emotional problems growing up which can affect their mental health. Often these are resolved over time but sometimes the young people will need professional support and the situation may be a safeguarding concern.

If staff have a concern about a child's mental health or wellbeing that is also a safeguarding concern, immediate action should be taken, following the Safeguarding Policy and procedures. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

Signs of depression or anxiety in young people can sometimes look like normal behaviour, particularly in teenagers who may keep their feelings to themselves.

It's also natural for young people to feel stressed or anxious about things like exams or moving to a new school. But while these experiences can be very difficult, they're different from longer term depression or anxiety, which affect how they feel every day.
Signs of anxiety can include:

- Persistent low mood or lack of motivation
- Not enjoying what they used to like doing
- Becoming withdrawn and spending less time with their friends and family
- Experiencing low self-esteem of feeling like they are 'worthless'
- Feeling tearful or upset regularly
- Changes in eating or sleeping habits

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.

If a child is struggling with their mental health, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential signs which education staff can recognise.

- These could include:
  significant changes in behaviour
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff in schools can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow their safeguarding and child protection policy and speak to their designated safeguarding lead or deputy. If staff feel that a child is in danger and are in school, they should contact the school designated safeguarding lead immediately. If outside a school/college location, they call the emergency services.

A.3 Safeguarding Children and Young People with Special Educational Needs and Disabilities or Health Issues.

The term special educational needs and disabilities (SEND) refers to children and young people who have disabilities or additional needs. Children and young people with disabilities are 3.7 times more likely than other children to be abused or neglected (World Health Organisation). Adults who work with children and young people with SEND should be aware of the additional needs that children may have, which could mean they are more vulnerable to abuse, neglect and exploitation and/or less able to speak out if something isn't right. Some children may be vulnerable because:

- Assumption that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

- communication barriers and difficulties in managing or reporting these challenging risks that they do not understand that what is happening to them is abuse
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and the repeating the content/behaviours in schools/colleges or the consequences of doing so
- have additional communication needs
- do not understand that what is happening to them is abuse
- need intimate care or are isolated from others
- are dependent on adults for care.

Parenting children with disabilities comes with additional stresses or challenges, which can heighten the potential for abuse or neglect. Professionals can sometimes miss signs of abuse due to the complexity of young people's needs, an acceptance of things being how they are, or allowing their recognition of the challenges facing parents to cloud their judgement leading to abuse or neglect being under-reported.

It is therefore important that we maintain an open mind about what we are seeing and maintain a professional curiosity. For example:

- not accepting that an injury is a result of the needs of the child but instead consider what other causes there may be and what the evidence suggests.
- considering a behaviour such as self-harm as possibly being indicative of abuse.
- recognising the potential for 'fabricated or induced illness'.