



Safeguarding and Child Protection Policy September 2026

Next review date September 2027

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Introduction

Protecting people and safeguarding responsibilities are priorities for The Ernest Cook Trust ("the Trust"). The Trust supports and works with a wide range of people in many locations and recognises that some people the Trust comes into contact with may be at risk of harm.

The Trust supports the rights of people to live in safety, free from abuse and neglect. We aim to provide a safe and trusted environment that safeguards everyone, including beneficiaries, employees and volunteers.

The aim of this policy is to set out how the Trust promotes an organisational culture that prioritises safeguarding and manages reported incidents or concerns, sensitively and properly. It demonstrates how safeguarding concerns and incidents are prevented, identified and handled. It explains the responsibilities of the Board of Trustees to ensure that risks are managed appropriately, with clear routes of escalation.

Trustees have accountability to ensure the safeguarding of children and young people, and adults at risk and aim to protect from harm, anyone that comes into contact with the Trust.

The policy has been written in line with recommendations made within the latest versions of:

- Keeping Children Safe in Education
- Working Together to Safeguard Children
- Early Years Statutory Framework
- Charity Commission Guidelines 2021
- Children Act 1989 & the Children Act 2004
- Human Rights Act 1998
- Equality Act 2010
- Prevent duty 2023
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR),
- Care Act 2014
- Care Standards Act 2000
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- After-school Club, Community activities and Tuition: Safeguarding Guidance for Providers 2023
- Guidance for safer working practice for those working with children and young people in education settings
- Protective Security and Preparedness for Education Settings (2025)
- Terrorism (Protection of Premises) Act aka Martyn's Law (2025)

The Trust recognises that safeguarding risks continue to evolve, particularly in relation to online harms, artificial intelligence-enabled abuse, cyber-enabled exploitation, misinformation, and emerging forms of child criminal and sexual exploitation. Staff and volunteers are expected to remain vigilant and undertake regular safeguarding training to understand emerging risks.

We ensure that everyone working at the Trust reads this Safeguarding Policy and 'What to do if you're worried a child is being abused'. In addition, everyone working directly with children should read Part one of Keeping Children Safe in Education.

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Safeguarding contact details will be reviewed at least annually and immediately following any staffing changes to ensure information remains accurate and accessible.

Definitions

'Safeguarding' is a term which is broader than 'child protection' or 'adult protection' as it also includes prevention.

Safeguarding and promoting the welfare of children 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 the 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
- taking action to enable all children to have the best outcomes

Keeping Children Safe in Education

Safeguarding adults is defined as:

Protecting and adult's right to live in safety, free from abuse and neglect

The Care Act

Keeping Children Safe in Education defines anyone who has not yet reached their 18th birthday as a 'child'.

The terms 'young person or young people' are used in this document and this includes children, young people and adults at risk.

The definition of an 'adult at risk' is any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is, or may be, unable to take care of themselves or unable to protect themselves against significant harm or serious exploitation.

The Trust has a wider definition of whom we consider to be adults at risk. This includes people encountering domestic abuse, exploitation, people who are experiencing

homelessness, people suffering from alcohol and substance misuse, those at risk of radicalisation, honour based abuse, modern slavery, forced labour, domestic servitude, young offenders, engagement with gangs, in care or leaving care, and people who are refugees or asylum seekers.

The Trust seeks to work in a trauma-informed approach, seeking external support where appropriate, and recognises that previous adverse experiences may influence an individual's behaviour, engagement, communication and ability to disclose concerns.

The Trust has a duty to protect the young people we work with from abuse. 'Abuse' is defined as any behaviour which knowingly or unwittingly causes harm, endangers life or violates rights. It is possible that the Trust will become aware of actual or potential abuse when carrying out its work, and this Policy sets out the Trust's commitment to protecting these groups from harm.

The main forms of abuse are divided into the following categories:

- Physical abuse - including hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person.
- Emotional abuse - persistent emotional maltreatment such as to cause severe and adverse effects on emotional development. It may involve conveying to young people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving young people the 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. These may include interactions that are beyond young people's developmental capability as well as overprotection and limitation of exploration and learning or preventing from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing young people to frequently feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment, although it may occur alone.
- Sexual abuse: involves forcing or enticing young people to take part in sexual activities, not necessarily involving violence, whether or not the young person 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 young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming 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 young people. The sexual abuse of young people by other young people is a specific safeguarding issue (also known as child-on-child abuse) all staff should be aware of it and of our policy and procedures for dealing with it.
- Neglect: the persistent failure to meet young people's basic physical and/or psychological needs, likely to result in serious impairment of health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure

access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to basic emotional needs.

- Child exploitation: both criminal and sexual exploitation are forms of abuse that may occur, in person or online, where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. All forms of exploitation can affect both male and females, and can include young people who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- Financial or material abuse - can include theft, fraud, exploitation, preventing a person from accessing their own money, benefits or assets, undue pressure, duress, threat, influence in connection with loans, wills, property or inheritance or financial transactions.
- Discriminatory abuse - can include unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010) Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic. Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader. Harassment or deliberate exclusion on the grounds of a protected characteristic. Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic. Substandard service provision relating to a protected characteristic.
- Institutional abuse - can include neglect and poor professional practice - this may take the form of isolated incidents of poor or unsatisfactory professional practice at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other.
- Child on child abuse - can include bullying (including cyberbullying, prejudice-based and discriminatory), abuse in intimate personal relationships between young people, known as teenage relationship abuse, physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, sexual violence and sexual harassment, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery), causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party, upskirting (now a criminal offence), 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.
- 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. Young people 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.
- Online abuse can include cyberbullying, online grooming, coercion, exploitation, exposure to harmful content, image-based abuse, online harassment, financial exploitation and abuse facilitated through social media, gaming platforms, messaging services or emerging technologies. Staff should remain vigilant to signs of online harm and report concerns in accordance with this policy.

Preventing Radicalisation & Channel

Protecting young people from the risk of radicalisation into terrorism is seen as part of our wider safeguarding duties and is similar in nature to protecting from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

The Trust recognises the increasing use of artificial intelligence and digital technologies by young people. Safeguarding considerations relating to AI-generated content, deepfakes, impersonation, online manipulation and inappropriate digital interactions should be considered when assessing risk.

Extremism: is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Radicalisation: refers to the process of a person legitimising support for, or use of, terrorist violence.

Terrorism: The use or threat of serious violence against a person or serious damage to property where that action is:

- designed to influence the government or an international governmental organisation or to intimidate the public or a section of the public; and
- for the purpose of advancing a political, religious, racial or ideological cause.

Although there is no single way of identifying whether young people are likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern which can be found [here](#).

Staff should also be able to spot the signs of potential extremism, radicalisation and terrorism as per the Home Office's requirement.

Channel is a confidential, voluntary multi-agency safeguarding programme that supports people who are vulnerable to radicalisation.

Principles and Responsibilities

We recognise that safeguarding and protecting people from harm goes beyond simply implementing policies and processes. Safeguarding and protecting people must go to the heart of the Trust's culture and is a fundamental responsibility for Trustees.

The Trust aims to provide a safe, trusted environment for all employees, volunteers and beneficiaries and to respond promptly and appropriately to reports of anyone who is actually or potentially at risk. This is done by:

- Safeguarding the welfare of all beneficiaries, employees and volunteers by embedding the necessary principles in all activities carried out by the Trust.
- Having the appropriate recruitment, selection and training procedures for employees and volunteers.
- Requiring all external agencies who work with the Trust to comply with the safeguarding requirements of the Trust.
- Requiring organisations receiving funding from the Trust to comply with our safeguarding requirements.

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- Providing training to all employees, Trustees and volunteers to ensure they understand and follow the requirements of this policy at induction, with annual update training.
- Ensuring the designated safeguarding leads have the appropriate status and authority to take lead responsibility for safeguarding and child protection, this will be explicit in their job description.
- Providing all employees with access to a trained designated safeguarding lead who will have the details of the appropriate local agencies to whom they can seek advice and report
- Concerns.
- Having procedures to ensure that concerns of abuse or neglect are dealt with appropriately and that action is taken promptly.
- Having procedures to ensure that allegations and low-level concerns around the inappropriate behaviour of adults, are dealt with appropriately and that action is taken promptly.
- Ensuring fundraising activities are carried out in accordance with the Trust's values and ethical standards.
- Conducting a programme of Disclosure and Barring Service Checks (DBS) on employees.

The key responsibilities of the Trust and the Leadership Team are to:

- Ensure all activities involving young people are carried out in ways that will foster security, confidence and independence.
- Ensure suitable levels of supervision are present whenever young people are present.
- Provide an environment in which everyone feels safe, secure, valued, respected and feel confident and know how to approach staff if they are in difficulty with the belief that they will be listened to.
- Raise and maintain staff awareness of the need to safeguard young people and their responsibilities in identifying and reporting issues.
- Emphasise the need for good levels of communication between all members of staff.
- Develop structured procedures within the Trust that should be followed by all members of staff and volunteers.
- Ensure that due diligence is carried out when working with young people or funding a third party to work with young people or allowing access to our sites by a third party organisation. This includes checking safeguarding policies and requiring that serious incidents are reported to us.
- Ensure that we receive written confirmation that all staff working within the Trust are appropriately checked as to their suitability for working with young people, including verification of their identity, qualifications and a satisfactory Disclosure and Barring Service (DBS) check (to a level appropriate to their role) and that a single central record of checks is maintained.

Safeguarding within the Trust

We will ensure that:

- Everyone associated with the Trust is aware that safeguarding is everybody's responsibility and we must always consider what is in young people's best interest.
- The Trust follows safer recruitment guidelines; all posts are subject to a relevant level DBS, dependent on the duties of the postholder, which is renewed every three

years.

- For new recruitment, one member of each interview panel will have undertaken appropriate safer recruitment training, which is refreshed every 3 years. The Trust also has a policy on recruitment of ex-offenders to ensure equal opportunities and safety.

Our recruitment process includes:

- advertising all posts with a clear safeguarding and child protection statement, highlighting that a DBS check will be required having a clear job description and person specification for all roles, which highlights safeguarding responsibilities.
- advertising roles widely and recruiting based on what someone knows rather than who they know.
- providing an applicant information pack and using a standard application form.
- having clear shortlisting and interviewing procedures with a minimum of two staff at each stage, including at least one person on every interview panel with safer recruitment training.
- interviews will be conducted in person, with all candidates being asked an agreed list of questions, including on their motivation for applying for the role and their attitude to safeguarding.
- applicants identified as unsuitable to work with young people will be rejected.
- carrying out pre-employment checks (for staff and volunteers), including Right to Work, DBS and references which specifically ask about the candidate's suitability and ability to work with young people.
- undertaking a thorough induction process, including safeguarding training and familiarisation with our child protection procedures and Safeguarding policy

All staff understand and fulfil their responsibilities and undergo annual safeguarding and child protection refresher training. Staff are trained to *Recognise, Respond, Report and Record* their concerns, through regularly updated training:

- **Recognise** - be able to identify signs of abuse, as listed above. This may include visible marks, changes in attitude or behaviour, persistent absenteeism, becoming unusually withdrawn or secretive, or suddenly possessing new, expensive items.
- **Respond** - know to call the emergency services in the case of immediate danger, and how to handle a disclosure from a young person, including remaining calm, listening carefully, reflect back, continuing at the pace of the person making the disclosure, reassuring them but not promising to keep anything secret.
- **Report** - all disclosures or concerns must be reported to a manager or Designated Safeguarding Lead urgently. All details must be written down, directly quoting the young person's words wherever possible.
- **Record** - make a note of what you've seen and done and share this with the Designated Safeguarding Lead or a manager.
- Safeguarding is also supported by our Staff Handbook, which includes guidance on safer working practices, policies on protection for whistle blowers, and our disciplinary procedure, which would apply in cases where safeguarding requirements have not been fulfilled.
- New members of staff, volunteers and people on work experience placements are provided with safeguarding training as part of their induction and will be made aware of those members of staff that they should contact to discuss concerns. All new staff will have a DBS check, at the relevant level, carried out prior to starting

work young people.

- All safeguarding allegations, or low-level concerns, against staff or adults working for the Trust are recorded, advice is sought, or where they meet the harm test, are referred to the local authority designated lead (LADO). Such incidents may also be reported to funders and the Charity Commission, as required.
- Members of staff or volunteers found to be unsuitable to work with young people, will be notified to the Disclosure and Barring Service (DBS) for consideration for barring following resignation, dismissal, or when the Trust ceases to use their service as a result of substantiated allegation.
- If a young person is in immediate danger, staff will refer the matter immediately to the Local Authority or the Police.
- Support is available to staff involved in the management of safeguarding disclosures and allegations.

The role of Trustees

One of the key requirements of Trustees is that they can readily explain their charity's approach to managing safeguarding. Trustees also need to ensure that any safeguarding risks and mitigation are documented and reviewed.

Trustees will receive an annual safeguarding assurance report in line with the end of the financial year, including training compliance, safeguarding incidents, lessons learned, policy review outcomes, partnership due diligence findings and any required improvement actions.

To this end, the Trust will ensure that:

- Training is available to enable Trustees to fully understand and implement their Safeguarding duties.
- Safeguarding risks and mitigation are listed on the Trust's risk registers and updated as necessary.
- Support and guidance will be given to Trustees when undertaking site visits to the Trust's tenants, to other charities and stakeholders, to ensure that Safeguarding is investigated as part of due diligence checks. Safeguarding is included in the list of standard questions raised during a visit.

Reporting safeguarding concerns

All safeguarding issues raised by staff should be raised with the Designated Safeguarding Lead, a Deputy Designated Safeguarding Lead or the Senior Safeguarding Lead.

The Designated Safeguarding Lead (DSL) is responsible for:

- Ensuring there is a member of the safeguarding team contactable, when young people are present, to discuss any safeguarding concerns.
- Ensuring the safeguarding team members undergo training to provide them with the knowledge and skills required to carry out the role, at least every two years.
- Refer cases of suspected abuse, exploitation and neglect to the local authority, as required, and support staff who make referrals.
- Refer cases where a person is dismissed or left due to risk/harm to a young person to the Disclosure and Barring Service, as required.
- Refer cases where a crime may have been committed to the Police, as required.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Ensure that child protection files are kept up to date, kept confidential, held securely

and that the content within is shared in line with the information sharing advice guidance.

- Keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions.
- Understand relevant data protection legislation and regulations.
- Ensure staff have access, and understand, our safeguarding and child protection policy, procedures and training requirements and opportunities.
- Ensure this policy is updated and reviewed annually, as a minimum.
- Encourage a culture of listening to young people.
- Being aware of all planned activities involving young people.
- Informing the Senior Safeguarding Lead and Chief Executive immediately with details of any incidents and cases that have occurred.
- Providing Trustees with an annual report detailing any changes to legislation, policies and procedures, and details of any incidents and cases that have occurred. Serious concerns will be reported to Trustees at any meeting as a standard agenda item.
- Leading on the Trust's activities in relation to the Government's Prevent anti-radicalisation strategy. While the Trust does not have a statutory obligation in this area, it is an important part of our safeguarding considerations.

Deputy Designated Safeguarding Leads (DDSL) are able to carry out all of the duties above if the DSL is not available, and staff should contact a DDSL with any safeguarding concerns if they are not able to reach the DSL.

Recognising abuse

To ensure that young people are protected from harm, we need to be aware of all indicators of abuse, neglect and exploitation.

Knowing what to look for is vital for early identification of abuse or neglect. All staff must follow the procedures set out in this policy, and be aware of indicators of abuse and neglect, including exploitation, so that they are able to identify cases young people who may need help or protection. Staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should be vigilant and if they are unsure, they should always speak to the designated safeguarding lead or deputy.

Staff should understand that mental health concerns may be both an indicator and consequence of abuse, neglect or exploitation. Where young people present with mental health difficulties, safeguarding considerations should be explored alongside welfare support measures.

What staff need to know and do

All staff are aware of safeguarding issues that can put young people at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nudes (also known as youth produced sexual imagery) that put young people in danger.

Staff should exercise professional curiosity where circumstances, presentations or explanations appear inconsistent. Professional curiosity involves respectfully seeking additional information, asking appropriate open questions and considering whether further safeguarding action may be necessary.

It is not the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. Those working with children have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of young people must be immediately reported and recorded following our child protection procedure.

Staff must immediately report to the DSL:

- any suspicion that a young person is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in day to day life.
- any explanation given which appears inconsistent or suspicious.
- any behaviours which give rise to suspicions that a young person may have suffered harm.
- any concerns that a young person may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- any concerns that a young person is presenting signs or symptoms of abuse or neglect.
- any hint or disclosure of abuse from any person.
- any concerns regarding a person(s) who may pose a risk to young people.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report their concerns - they do not need 'absolute proof' that the child is at risk.

Concerns about a child or adult at risk

There will be occasions when staff may suspect a young person may be at risk but have no 'real' evidence. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died. It is fine to ask if they are ok or if you can help in any way.

All concerns should be reported via CPOMS. If the young person does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the young person, if the member of staff remains concerned, they should immediately discuss their concerns with the DSL.

Child or adult at risk disclosure

It takes a lot of courage for young people to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a young person talks to a member of staff about any risks to their safety or wellbeing, the staff member must let them know they cannot keep the information secret but will keep it private and only pass it on to those who can help them. The point at which they tell the person is a matter for professional judgement. If they jump in immediately the young person may think that they do not want to listen, if left until the very end of the conversation, they may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with young people, staff will:

- allow them to speak freely.
- listen to and take seriously any disclosure or information that a young person may be at risk of harm.
- remain calm and not overreact - the young person may stop talking if they feel they are upsetting their listener.
- give reassuring nods or words of comfort - 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?'
- not be afraid of silences - remember how hard this must be for the young person.
- under no circumstances ask investigative questions - such as how many times this has happened, whether it happens to others, or what does the young person's parent think about all this.
- clarify the information.
- at an appropriate time tell them that in order to help them, the member of staff or volunteer must pass the information on.
- not automatically offer any physical touch as comfort. It may be anything but comforting to a young person who has been abused.
- try not to show signs of shock, horror, or surprise.
- not express feelings or judgements regarding any lead alleged to have harmed the young person.
- explain sensitively that they have a responsibility to refer the information to the DSL.
- reassure and support the young person as far as possible.
- explain that only those who 'need to know' will be told.
- tell the young person what will happen next.
- write up their conversation immediately on the Cause for Concern Form and speak with the DSL.
- if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so.
- do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Staff should understand they:

- should not investigate but will, wherever possible, elicit enough information to pass on to the DSL in order that they can make an informed decision of what to do next.
- will not discuss the issue with colleagues, friends or family.
- must record details following the above reporting procedures.
- in an emergency take the necessary action to help the young person e.g., refer to the police or children's social care.
- maintain an attitude of **'it could happen here'**.

NSPCC Child Protection Helpline

The NSPCC Child Protection Helpline is a free 24-hour service that provides counselling, information, and advice to anyone concerned about a child at risk of abuse.

Telephone: 0808 800 5000 - Email: help@nspcc.org.uk

If you are concerned about an adult experiencing or being at risk of abuse or neglect contact the local authority.

What to report:

Recording Concerns Checklist

- Child's Name.
- Using the child's words.
- Where/observations/witnesses/who were involved.
- Who passed information onto you.
- Date, time and day of the observations & when reported.
- Record of the facts -i.e. what you saw, what you heard.
- Be careful to avoid any opinion, hearsay or gossip or clearly identify it as such.
- Clear about why you are concerned about the child.
- Decisions, and reasons for those decisions, actions taken, referrals made or reasons for non-referral.
- Name and your role.
- Sign and date the document.
- Who are you passing your concerns onto.

Young people should also feel able to report concerns to the Trust, with confidence that they will be listened to. In most cases, we would expect young people to report safeguarding concerns to their school, setting or group leader, but particularly where we work with children/adults directly (eg trainees, apprentices, young advisers), we must ensure they are aware that our safeguarding team is available to support them. Our offices have posters with contact details for our Safeguarding leads, and where appropriate, staff and volunteers will be introduced to the DSL or DDSL directly during their induction.

Any staff member, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they must immediately report this to the Police. The staff member must personally report to the police, unless they have a good reason not to, they should discuss any such case with the DSL and involve local authority children's social care as appropriate.

The duty does not apply in relation to at risk or suspected cases (i.e. where the staff member does not discover that an act of FGM appears to have been carried out).

Safeguarding and Partnership Working/Collaboration

The Trust has developed successful partnerships with external organisations to help deliver its strategic aims.

Trustees and staff must confirm that adequate safeguarding measures are in place in organisations where they are seeking to develop external partnerships or collaboration opportunities.

Where the Trust is working in collaboration with an organisation, an agreed approach to Safeguarding must be in place, through either the acknowledgement of the Safeguarding Policy of the partner organisation, or in the case of longer-term partnerships, the development of a joint approach to safeguarding.

A due diligence process is undertaken, and a written agreement put in place when working with external organisations. This includes the requirement for DBS checks, at the relevant level, for key roles, evidence of a safeguarding policy and a regular schedule of meetings.

Safeguarding and Grant Applicants and Recipients

Safeguarding is a key consideration in the assessment, award and monitoring of grants.

Grant Giving

The Trust's grant giving guidelines and application process includes questions to ensure that all the charities/organisations funded by the Trust can demonstrate a good understanding of safeguarding and have appropriate policies in place. This includes confirmation that applicants have a Safeguarding Policy that is reviewed regularly (preferably annually). A copy of the policy may be requested through the application process. The charity/organisation should be able to provide details of:

- A named lead person to whom staff report safeguarding issues that arise.
- A process for reporting incidents.
- Affirmation that all staff and volunteers who may have contact with young people have undergone successful an appropriate level Disclosure and Barring Service (DBS) checks.

If there are any concerns about an organisation's Safeguarding Policy, approach, process or implementation, a grant will not be awarded until such concerns have been addressed. If during an application assessment Trust staff have serious concerns, they should contact the Designated Safeguarding Lead (DSL) who, if appropriate, will contact the Charity Commission, the Safeguarding Team of the relevant local authority and/or police if necessary.

Complaints

If the Trust is alerted to a safeguarding concern in a funded organisation by a complainant, the Trust will refer the complainant to the organisation in question so that its own procedures can be followed. If the safeguarding issue or the organisation's approach to addressing the issue raises further concerns, then Trustees and Trust staff should bring the issue to the attention of the DSL. The DSL will decide on the severity of the incident and, if appropriate, will contact the Charity Commission, the Safeguarding Team of the relevant local authority and/or police if necessary.

Visits

The Trust will also ensure that during visits by Trust Staff or Trustees to charities/organisations (whether currently funded or potential applicants), that appropriate safeguarding practices in line with The Ernest Cook Trust Safeguarding Policy are implemented. Any concerns will be brought to the attention of the organisation/charity's DSL and details will be reported to the Trust's DSL, who if appropriate will contact the Charity Commission, the Safeguarding Team of the relevant local authority and/or police if necessary.

Confidentiality and consent

The Trust acknowledges that all matters relating to safeguarding are sensitive. The DSL will disclose any confidential information about a young person to other members of staff on a need-to-know basis only.

All staff have a professional responsibility to share information with other agencies in order to safeguard young people. Staff recognise that they cannot promise they will keep secrets that compromise safety or wellbeing.

Information sharing decisions should be timely, necessary, proportionate, relevant, accurate and secure. Concerns about information sharing must never delay action required to safeguard young people.

We take a child/person-centred approach to safeguarding, considering the wishes of the person involved and what is in their best interest, where appropriate. This means that we aim to empower people to make their own decisions and give consent, work to prevent harm before it happens, and consider proportionality (i.e. - the least intrusive response appropriate to the risk).

Where concerns relate to a young person, their wishes for what they would like to happen should be considered and discussed with them. Consent is not needed to report a concern if it's in the public interest (e.g., harm may come to them or others if nothing is done) or public duty demands (e.g., a crime has been committed or will be committed), but transparency is important for trust with the person making the disclosure. The mental capacity of a vulnerable adult to consent to action being taken will also be relevant. Whether consent has been given or not, you may discuss your concerns with the DSL, who will be able to assist in making decisions on appropriate referrals where needed.

Supporting Staff

The Trust recognises that staff working with young people who have suffered harm or appear to be likely to suffer harm may find the situation stressful and upsetting. Support is available to staff experiencing such situations. The Health and Wellbeing of staff is addressed throughout the Trust's Staff Handbook.

Staff should take care not to place themselves in a vulnerable position and take measures to ensure that they are never alone with a young person (e.g through appropriate session design and staffing plans), and never make personal contact with them. Please note this is not required when the young person is an employee of the Trust as we recognise young employees are likely to need to spend time shadowing colleagues as their training, and it is not practicable for them to be chaperoned on all occasions. This may also be the case from time to time during work experience placements, in which case written parental permission must be sought in advance. A high level of professionalism and additional safeguarding training (e.g. focusing on 16-25 year olds) are recommended in these cases. Further guidance on appropriate professional behaviour is available in our Behaviour Code (see Appendix 1).

Prevention

The Trust can reduce the potential for ongoing harm to young people by providing them with good lines of communication with trusted adults, supportive friends and an ethos of protection. We will therefore:

- Work to establish and maintain an ethos where young people feel secure.
- Ensure that young people are adequately supervised at all times, predominantly by visiting teaching staff but assisted by Trust staff.
- Make sure that young people are encouraged to talk and are always listened to and that they know there is a trusted adult whom they can approach if they are worried or in difficulty.
- Ensure that all staff are aware of the organisation guidance in regard to mobile, online and video conferencing technology and have discussed safeguarding issues around the use of these technologies and platforms, and their associated risks. These issues are covered in our policies on Electronic Information and Communications systems, and Social Media

- Recognise that young people with Special Educational Needs and Disabilities (SEND) and perceived differences, those with lower levels of school attendance and those from households facing challenging circumstances e.g. parents or carers in prison or custody, issue around substance abuse, mental health issues, violence and divorce in their household, are more susceptible to being bullied or victims of abuse, and be particularly vigilant for disclosures from these young people. Consideration should also be given to how LGBTQ+ or gender questioning young people can be provided with a safe space to speak out or share their concerns with members of staff.
- Give learner-facing staff Prevent awareness training, in line with the Home Office's guidance on spotting radicalisation.

Planning Activities Involving Young People and Adults at Risk

All events and activities carried out by the Trust's Learning Team - on our own estates and elsewhere - will be planned to ensure all necessary risks relating to safeguarding and the activity itself are duly considered. Activities will consider the welfare of all involved in Learning activities. All necessary measures to supervise and monitor activities will be in place and all necessary risks assessed prior to sessions or engagement commencing. Any staff from other teams planning activities with young people should consult with the Learning Team for input.

Risk assessments will also be discussed with school and visiting organisations' leaders to ensure they are also aware of the requirements. School and community groups are supplied with detailed guidance on safe supervision ratios, minimum adult numbers and other safety measures through our Booking Agreement. Permission forms are required when The Trust plans to take photos or videos of visiting groups.

Where online activities are planned, the guidance outlined in our Safeguarding in Online Engagement document must be followed.

In the event that a late change of staffing is required, for instance due to illness, arrangements will be made to ensure adequate levels of supervision can be met. In some cases, this may mean adjusting the activity, changing group sizes, arranging for additional staff to attend or even cancelling certain activities.

Support for Tenants

As we are not a social landlord, the Trust does not have a statutory safeguarding responsibility for our residential, commercial or agricultural tenants (beyond our duty of care to ensure that properties and practices are safe). However, we recognise that we can play a vital role in spotting signs of abuse and ensuring that safeguarding concerns regarding those we come into contact with are properly raised.

All staff are trained in recognising abuse, neglect and exploitation, and should inform the DSL of any concerns relating to tenants so that appropriate referrals can be made.

Monitoring and Evaluation

This policy will be monitored and evaluated on a regular basis, but annually as a minimum to ensure it is up to date and effective. Following safeguarding incidents, concerns or near misses, the Trust will identify lessons learned and, where appropriate, update safeguarding practices, training and procedures to reduce future risk.

Safeguarding and Child Protection Policy September 2026

Signed:

A handwritten signature in black ink, appearing to read 'Z Kabba', with a large, stylized initial 'Z'.

Zainab Kabba, Senior Safeguarding Lead

Date: 5 October 2026

This policy will next be reviewed in September 2027

Appendix 1: Behaviour code for adults working with children

The purpose and scope of the behaviour code

This behaviour code outlines the conduct that The Ernest Cook Trust expects from all our staff and volunteers. This includes Trustees, agency staff, interns, students on work placement and anyone who is undertaking duties for the Trust, whether paid or unpaid. The behaviour code is there to help us protect young people from abuse. It has been informed by the views of young people. The Ernest Cook Trust is responsible for making sure everyone taking part in our activities has seen, understood and agreed to follow the code of behaviour, and that they understand the consequences of inappropriate behaviour.

The role of staff and volunteers

In your role at The Ernest Cook Trust you are acting in a position of trust and authority and have a duty of care towards the young people we work with. You are likely to be seen as a role model, and are expected to act appropriately. We expect people who take part in our services to display appropriate behaviour at all times. This includes behaviour that takes place outside our organisation and behaviour that takes place online.

Responsibility of staff and volunteers

You are responsible for:

- prioritising the welfare of children and young people.
- providing a safe environment for young people.
- ensuring equipment is used safely and for its intended purpose.
- having good awareness of issues to do with safeguarding and child protection and taking action when appropriate.
- following our principles, policies and procedures, including our policies and procedures for safeguarding and child protection, whistleblowing and online safety.
- staying within the law at all times.
- modelling good behaviour for young people to follow.
- challenging all inappropriate behaviour and reporting any breaches of the Behaviour Code to the Designated Safeguarding Lead.
- reporting all allegations and low-level concerns about inappropriate behaviour, following our safeguarding and child protection procedures - this includes inappropriate behaviour displayed by an adult or child and directed at anybody of any age.

Respecting children and young people, and adults at risk

You should:

- listen to and respect at all times.
- value and take contributions seriously, actively involving them in planning activities wherever possible.
- respect a young person's right to personal privacy as far as possible - if you need to break confidentiality in order to follow child protection procedures, it is important to explain this to young people at the earliest opportunity.

Diversity and inclusion

You should:

- treat young people fairly and without prejudice or discrimination.
- understand that young people are individuals with individual needs.
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the group/organization.

- challenge discrimination and prejudice.
- encourage young people to speak out about attitudes or behaviour that makes them uncomfortable.

Appropriate relationships: Abuse of trust

All staff should be aware that inappropriate behaviour towards young people is unacceptable and that their conduct must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a staff member and a young person under 18 may be a criminal offence, even if that young person is over the age of consent.

You should:

- promote relationships that are based on openness, honesty, trust and respect.
- avoid showing favouritism.
- be patient with others.
- exercise caution when you are discussing sensitive issues with young people.
- ensure your contact with young people is appropriate and relevant to the nature of the activity you are involved in.
- ensure that whenever possible, there is more than one adult present during activities with young people - if a situation arises where you are alone with a young person, ensure that you are within sight or can be heard by other adults. If a young person specifically asks for or needs some individual time with you, ensure other staff or volunteers know where you and the young person are.
- only provide personal care in an emergency and make sure there is more than one adult present, if possible, unless it has been agreed that the provision of personal care is part of your role, and you have been trained to do this safely.

Inappropriate behaviour

When working with young people you must not:

- allow concerns or allegations to go unreported.
- take unnecessary risks.
- smoke, including e-cigarettes and vapes, consume alcohol or use illegal substances.
- initiate or encourage inappropriate relationships with young people.
- make inappropriate promises to young people.
- engage in behaviour that is in any way abusive, including having any form of sexual contact with young people.
- let young people have your personal contact details (mobile number, email, or postal address) or have contact with them including via a personal social media account.
- act in a way that can be perceived as threatening or intrusive.
- patronise young people.
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of young people.
- under no circumstances inflict physical or psychological harm on young people.

Safeguarding Concerns or Allegations Against Professional Who Work with Children

We have our own procedures for dealing with low-level concerns and/or allegations against those adults working in or on behalf The Ernest Cook Trust.

We follow the procedures as laid out in Part four, Keeping Children Safe in Education which has two sections covering the two levels of allegations/concerns and are consistent with local safeguarding procedures and practice guidance.

What staff need to know and do

An allegation is any information which indicates any adult (paid or voluntary) who works with young people may have:

1. Behaved in a way that has harmed a young person or may have harmed a young person.
2. Possibly committed a criminal offence against or related to a young person.
3. Behaved towards a young person in such a way that indicates he or she may pose a risk of harm to young people.
4. Behaved or may have behaved in a way that indicates they may not be suitable to work with young people.

Allegations regarding adults must be reported immediately to the Designated Safeguarding Lead.

If you feel you may be at risk of an allegation, then self-report the issue as you may find yourself in a difficult situation.

Concerns that meet the above criteria will be referred to the Local Authority Designated Officer (LADO) within one working day. Initial discussions with the LADO will consider the nature of the allegation and next steps.

Whilst we may not directly employ all adults, we will ensure allegations are dealt with properly.

We have agreed procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not

Concerns that do not meet the Harm Threshold

We recognise the importance of responding to and dealing with any concerns in a timely manner, and all those working in or on behalf of The Ernest Cook Trust, will deal with concerns promptly and appropriately. We aim to create a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. If we implement this correctly, this should encourage an open and transparent culture; enable us to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of The Ernest Cook Trust are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Definition of low-level concerns

The term 'low-level' concern is any concern - no matter how small - that an adult may have acted in a way that:

- is inconsistent with the Staff Handbook, including inappropriate conduct outside of work.
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being overly friendly with young people.
- having favourites.
- taking photographs of young people on their mobile phone.
- engaging with young people on a one-to-one basis in a secluded area or behind a closed door.
- using inappropriate sexualised, intimidating, or offensive language.

Whistleblowing

We understand that employees are often the first to realise that there may be something seriously wrong within the organisation. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or the organisation. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

We are committed to the highest possible standards of openness, probity, and accountability. In line with that commitment and to reflect the principles in Sir Robert Francis' Freedom to Speak Up Review, we expect employees, and others, who have serious concerns about any aspect of our safeguarding practices to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis, more details and organisations which may be contacted can be found in the Whistleblowing Policy.

NSPCC Whistleblowing Advice Line

The NSPCC has launched a government funded Whistleblowing Advice Line. This will take calls from professionals from any sector who are worried about the way their, or another, organisation is dealing with child protection issues. Employees who don't feel able to escalate these issues internally can contact the service, as well as those who have been unsuccessful in doing so.

- general advice on whistleblowing can be found via: [Advice on Whistleblowing](#)
- the NSPCC's [what you can do to report abuse](#) dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school.
 - call 0800 028 0285 - line is available from 8:00 AM to 8:00 PM, Monday to Friday
 - email: help@nspcc.org.uk

Upholding this code of behaviour

You should always follow this code of behaviour and never rely on your reputation or that of our organisation to protect you. If you have behaved inappropriately, you will be subject to our disciplinary procedures. Depending on the seriousness of the situation, you might be asked to leave The Ernest Cook Trust. We might also make a report to statutory agencies such as the police and/or the local authority child protection services. If you become aware of any breaches of this code, you must report them to the Designated Safeguarding Lead. If necessary, you should follow our whistleblowing procedure and safeguarding and child protection procedures.

This behaviour code has been adopted from an NSPCC and Safer Recruitment Consortium resources and reflects best practice for those working with children and young people, and adults at risk.