

Safeguarding Children and Young People Policy

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Introduction and Purpose

InterAct is committed to safeguarding and promoting the welfare, well-being, rights, and safety of all children and young people who engage with the organisation.

InterAct recognises that safeguarding is everyone's responsibility and that all children and young people, regardless of age, disability, neurodivergence, race, religion or belief, sex, gender identity, sexual orientation, language, culture, social background, or family circumstances, have the right to:

- be protected from abuse, neglect, exploitation, discrimination, and harm;
- feel safe, listened to, respected, and valued;
- have their wishes, feelings, communication needs, and lived experiences considered;
- receive appropriate support and protection; and
- participate in activities and services in safe and supportive environments.

InterAct works with children and young people with a range of needs and recognises that some children may be at increased risk of abuse, neglect, exploitation, coercion, bullying, online harm, discrimination, or poor outcomes.

The purpose of this policy is to:

- protect children and young people from harm;
- support a safe and positive organisational culture;
- ensure safeguarding concerns are identified, reported, escalated, and managed appropriately;
- support compliance with legal and regulatory obligations;
- support effective multi-agency safeguarding practice;
- promote early intervention and professional curiosity;
- support staff, volunteers, and trustees in understanding their safeguarding responsibilities; and
- ensure safeguarding remains central to InterAct's governance and operational arrangements.

InterAct recognises that safeguarding includes:

- prevention of harm;
- protecting children from abuse and neglect;
- promoting welfare and well-being;
- creating safe environments;
- listening to children;
- taking action where concerns arise; and
- working collaboratively with families, professionals, and agencies.

Scope

This policy applies to:

- trustees;
- the Chief Executive Officer (CEO);
- the Senior Management Team (SMT);
- employees;
- volunteers;
- sessional workers;
- agency staff;
- contractors;
- students and placements; and
- any individual acting on behalf of InterAct.

This policy applies to all InterAct activities, services, projects, community activities, online engagement, trips, residential activities, partnerships, and events involving children and young people.

Definitions

Children: A child is defined as anyone who has not yet reached their 18th birthday.

Young People: A young person is a person between 16 and 18 years of age. Young people have certain rights, but are still considered children.

Child protection guidance points out that even if a child has reached 16 years of age and is living independently, in further education, a member of the armed forces, in hospital or in custody in the secure estate, they are still legally children and should be given the same protection and entitlements as any other child.

Working Together to Safeguard Children, HM Government 2026, defines **safeguarding** and promoting the welfare of children 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 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.

Legal and Regulatory Requirements

This policy has been developed with reference to:

- Children Act 1989 and 2004;
- Children and Social Work Act 2017;
- Working Together to Safeguard Children 2023 and subsequent updates, and safeguarding practice expectations current at the time of review;
- Keeping Children Safe in Education 2025;
- Human Rights Act 1998;
- Equality Act 2010;
- Data Protection Act 2018 and UK GDPR;
- Sexual Offences Act 2003;
- Safeguarding Vulnerable Groups Act 2006;
- Counter-Terrorism and Security Act 2015;
- Mental Capacity Act 2005;
- relevant Essex Safeguarding Children Partnership (ESCP) procedures and guidance;
- Charity Commission guidance, including Serious Incident Reporting guidance;
- relevant local safeguarding partnership procedures; and
- other applicable legal, safeguarding, and regulatory requirements.

Although InterAct is not an education provider, the organisation considers relevant safeguarding principles within Keeping Children Safe in Education as recognised safeguarding best practice.

Roles and Responsibilities

Board of Trustees

The Board of Trustees has overall responsibility for ensuring appropriate safeguarding arrangements are in place.

Trustees are responsible for:

- ensuring safeguarding remains a governance priority;
- maintaining oversight of safeguarding arrangements and risks;
- ensuring safeguarding policies and procedures are implemented and reviewed;
- ensuring appropriate safeguarding leadership and accountability;
- ensuring serious safeguarding incidents are managed and escalated appropriately;
- ensuring safeguarding forms part of organisational risk management;
- receiving safeguarding oversight information periodically;
- supporting a culture of safeguarding, openness, and accountability; and
- ensuring compliance with safeguarding and Charity Commission obligations.

Chief Executive Officer (CEO)

The CEO has overall operational responsibility for safeguarding arrangements within InterAct.

The CEO is responsible for:

- ensuring safeguarding procedures are implemented effectively;
- ensuring safeguarding concerns are managed appropriately;
- ensuring safeguarding concerns are escalated where required;
- ensuring appropriate referrals are made to external agencies;
- ensuring safeguarding training and support arrangements are maintained;
- ensuring safeguarding records are maintained securely;
- supporting safeguarding oversight and governance arrangements;
- ensuring serious safeguarding incidents are reported to the Charity Commission where required; and
- promoting a positive safeguarding culture.

As the Designated Safeguarding Lead (DSL), the CEO is also responsible for:

- Acting as the main point of contact for safeguarding concerns relating to children and young people.
- Receiving, recording, assessing, and responding to safeguarding concerns, disclosures, allegations, or incidents.
- Making referrals to Children's Social Care, the Police, Local Authority Designated Officer (LADO), or other agencies where appropriate.

- Seeking advice from safeguarding agencies where there are concerns about a child's welfare or safety.
- Ensuring safeguarding concerns are managed promptly, proportionately, and in line with statutory guidance and local safeguarding procedures.
- Maintaining accurate, confidential, and secure safeguarding records.
- Ensuring safeguarding records are retained and shared appropriately and lawfully.
- Providing safeguarding advice, guidance, and support to staff, volunteers, and Trustees.
- Promoting a culture where safeguarding is recognised as everybody's responsibility.
- Ensuring staff and volunteers understand:
 - how to recognise signs of abuse, neglect, exploitation, and harm;
 - how to respond to disclosures;
 - how to report concerns; and
 - their safeguarding responsibilities.
- Monitoring safeguarding trends, incidents, and risks within the Charity.
- Escalating concerns where safeguarding responses from external agencies are considered insufficient or delayed.
- Ensuring safeguarding concerns involving staff, volunteers, Trustees, or contractors are managed appropriately.
- Working with senior leadership and Trustees on safeguarding governance, risk management, and serious incident reporting.
- Ensuring safeguarding policies, procedures, and contact details remain current and reflect relevant legislation and guidance.
- Supporting safer recruitment practices, including safeguarding considerations during recruitment and onboarding.
- Ensuring safeguarding training is arranged, completed, and refreshed appropriately.
- Attending safeguarding meetings, case conferences, strategy discussions, or reviews where required.
- Supporting children, young people, families, and staff appropriately following safeguarding concerns or incidents.
- Promoting information sharing where necessary to safeguard children and young people, in line with legal and professional requirements.

Safeguarding Trustee

The Safeguarding Trustee (Mark Hagon) is also the Deputy DSL and is responsible for:

- Supporting the DSL with safeguarding referrals, record keeping, monitoring, and follow-up actions.
- Acting as a safeguarding point of contact when the DSL is unavailable.
- Receiving and responding to safeguarding concerns appropriately and escalating them to the DSL where required.
- Helping ensure that safeguarding records are accurate, secure, and up to date.
- Supporting managers, staff and volunteers with safeguarding advice and guidance.
- Helping promote safeguarding awareness and safer working practices across the Charity.
- Assisting with safeguarding training, inductions, and awareness activities.
- Supporting safeguarding audits, reviews, and policy updates.
- Escalating concerns immediately where a child or young person may be at risk of harm.
- Maintaining appropriate safeguarding knowledge, skills, and training relevant to the role.

Service and Project Managers

Service and Project Managers are responsible for:

- promoting safe practice within services and activities;
- supporting staff and volunteers with safeguarding concerns;
- ensuring concerns are escalated promptly;
- supporting safeguarding risk assessments;
- ensuring safeguarding procedures are followed;
- ensuring safeguarding discussions form part of supervision and support;
- supporting safe environments and safe activities; and
- escalating concerns relating to staff conduct, safeguarding, or operational risk.

Staff and Volunteers

All staff and volunteers are responsible for:

- safeguarding and promoting the welfare of children and young people;
- maintaining professional curiosity while maintaining professional boundaries;
- listening to children and taking concerns seriously;
- reporting concerns promptly;
- cooperating with safeguarding procedures and investigations;
- reporting low-level concerns and unsafe practice; and
- complying with this policy and related procedures.

Safeguarding is everyone's responsibility.

InterAct Safeguarding Contacts

InterAct Office		01245 801571
InterAct Designated Safeguarding Lead	Vickie Perkins	07976 781054
InterAct Deputy Safeguarding Lead	Mark Hagon	07957 997126

InterAct Youth Club and Activity Day Leaders also provide their phone number to the families of the children & young people they support.

In addition to our staff team, designated safeguarding Trustees are also involved with reviewing our policies and processes, as well as ensuring we are meeting our duty of care towards children and young people.

Other Safeguarding Contacts

Childline, 0800 1111

NSPCC Helpline, 0808 800 5000

Essex Children and Families Hub, 0345 603 7627

Essex Emergency Duty Service (Out of Hours), 0345 606 1212

Essex Local Authority Designated Officer (LADO), 03330 139 797

[Essex Safeguarding Children Board \(ESCB\)](#)

Essex Police, 999 / 112

Types of Abuse, Neglect and Exploitation – Children

General Guidance

Obvious signs of abuse, neglect and exploitation may be something that you have seen or heard, or an individual may disclose to you that they are at risk of abuse or are being abused, neglected or exploited.

Other signs may be less obvious and may not be noticed unless an individual has direct contact with the person being abused over a period of time.

One or more signs do not necessarily mean that a child or young person is being abused, as there could be other things happening in their life that are affecting their behaviour or explain what you can see outwardly. However, signs must be noted, and where there is a genuine concern, they must be reported.

It is therefore important that staff:

- Recognise common signs of abuse, neglect and exploitation; and
- Understand that children can be at risk of harm inside and outside of their home, inside and outside of education, and online; and
- Be aware that abuse, neglect, exploitation, 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.

What is Abuse?

Generally, abuse can be defined as:

"a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill-treatment that is not physical, as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children."

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.

Sexual abuse: a form of abuse which involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Emotional abuse: the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning or preventing the child 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 children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may 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 a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child-on-child abuse: which 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 (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- 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 engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, and/or
- initiation/hazing-type violence and rituals.

Radicalisation: Radicalisation is the process by which a young person is groomed and manipulated into adopting extreme political, social, or religious ideologies. It is treated as a severe child protection

concern because it can lead them to commit, or become victims of, terrorist violence and significant harm.

Child criminal and/or sexual exploitation: forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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.

Female genital mutilation: the non-medical practice of partially or fully removing or injuring the external female genitalia. It is a procedure often carried out on girls and young women, typically under the age of 15, as a cultural or social practice with no health benefits. In the UK, FGM is considered a form of child abuse, recognised as a severe violation of human rights and a criminal offence under the Female Genital Mutilation Act 2003.

Forced marriage: involves a child or young person being coerced, threatened, or manipulated into marriage without their free and informed consent. It is illegal in the UK, and the Forced Marriage (Civil Protection) Act 2007 provides protective orders for those at risk. Unlike arranged marriage, where both parties consent, forced marriage deprives a child of their right to choose and may involve emotional, physical, or financial abuse.

Gender and Honour-based violence: a type of violence that is perpetrated in the name of protecting or restoring the perceived "honour" of an individual, family, or community. It can include various forms of abuse—such as physical assault, emotional abuse, threats, or even homicide—often targeted at individuals who are seen as bringing shame to their family or not conforming to traditional gender roles.

Child abduction: involves unlawfully taking, detaining, or removing a child from a person who has legal custody or guardianship without consent. In the UK, child abduction is a criminal offence under the Child Abduction Act 1984, and it includes both domestic abduction (e.g., by a non-custodial parent) and international abduction (e.g., removing a child from the country without consent). Child abduction places a child at risk of harm and exploitation and is treated as a serious safeguarding issue.

This list is not exhaustive – please see the [Essex Safeguarding Children Board Safeguarding Topics page](#) for more information.

Policy

Safeguarding Principles

InterAct is committed to:

- maintaining a child-centred safeguarding culture;
- listening to children and taking their views seriously;
- promoting safe, respectful, inclusive, and supportive environments;
- acting promptly where concerns arise;
- supporting effective multi-agency safeguarding practice;
- maintaining clear reporting and escalation arrangements;
- supporting safe recruitment and workforce practices;
- supporting professional curiosity and reflective safeguarding practice;
- recognising the impact of trauma, disability, neurodivergence, and communication needs;
- recognising that safeguarding concerns may occur online and offline;
- promoting equality, inclusion, dignity, and respect; and
- ensuring safeguarding forms part of governance, risk management, and organisational oversight.

InterAct recognises that:

- children may not always disclose abuse directly;
- safeguarding concerns may present through patterns of low-level concerns;
- children with SEND or neurodivergent children may experience additional barriers to disclosure or protection;
- safeguarding risks may change over time;
- abuse may occur in families, communities, organisations, peer groups, or online environments; and
- no single professional or agency can safeguard children alone.

Safer Recruitment

InterAct is committed to safer recruitment and workforce safeguarding practices.

Safeguarding arrangements may include:

- appropriate application and recruitment processes;
- identity verification;
- references;
- DBS checks where appropriate;
- safeguarding-focused interviews;
- risk-based recruitment decisions;

- safeguarding induction;
- probationary oversight;
- supervision and training;
- ongoing suitability monitoring; and
- clear professional boundaries.

InterAct recognises that safeguarding responsibilities continue throughout employment and volunteering relationships.

Staff Training

The Charity recognises that effective safeguarding depends on staff, volunteers, trustees, and others working for us or on our behalf understanding their safeguarding responsibilities and having the knowledge and confidence to respond appropriately to concerns.

All staff and volunteers who work with, or may come into contact with, children and young people will receive safeguarding training appropriate to their role. This will normally include:

- recognising signs and indicators of abuse, neglect, exploitation, and harm;
- responding appropriately to disclosures;
- reporting safeguarding concerns;
- professional boundaries and safer working practices;
- online safety and emerging safeguarding risks;
- local safeguarding procedures and reporting arrangements; and
- the role of the Designated Safeguarding Lead (DSL) and Deputy DSL.

Safeguarding training will normally form part of induction and will be refreshed periodically to ensure knowledge remains current.

The DSL and Deputy DSL must complete safeguarding training appropriate to their responsibilities. The Deputy DSL has completed Level 3 Designated Safeguarding Lead training.

The Charity will normally refresh Level 3 DSL safeguarding training every two years, although Essex Safeguarding Children Board guidance currently recommends refresher training at least every three years. Additional safeguarding updates, briefings, workshops, or continuous professional development activities may also be undertaken between formal training periods to ensure safeguarding knowledge remains up to date.

Records of safeguarding training completed by staff and volunteers will be maintained by the Charity.

Recognising Abuse and Safeguarding Concerns

Abuse may occur online or offline and may be carried out by:

- adults;
- children or young people;
- peers;
- family members;

- professionals;
- volunteers; or
- other individuals.

Abuse may include:

- physical abuse;
- emotional abuse;
- sexual abuse;
- neglect;
- bullying;
- child-on-child abuse;
- exploitation;
- online abuse;
- domestic abuse;
- harmful sexual behaviour;
- criminal exploitation;
- child sexual exploitation;
- radicalisation;
- coercive control;
- forced marriage;
- honour-based abuse;
- female genital mutilation;
- trafficking; or
- discriminatory abuse.

InterAct recognises that safeguarding concerns may also involve:

- online coercion;
- sextortion;
- image-based abuse;
- livestreaming abuse;
- AI-generated explicit imagery or deepfake abuse;
- online grooming through gaming or communication platforms;
- exploitative online relationships;
- online radicalisation;
- harmful online communities; and
- misuse of AI or digital technology to manipulate or exploit children.

InterAct will never dismiss abuse, harmful sexual behaviour, or child-on-child abuse as:

- banter;
- experimentation;
- normal behaviour;
- joking; or
- part of growing up.

Professional Curiosity

InterAct recognises the importance of professional curiosity in safeguarding practice.

Staff and volunteers should:

- remain professionally curious where concerns arise;
- consider whether explanations fully account for concerns or injuries;
- consider patterns of behaviour or repeated low-level concerns;
- respectfully challenge inconsistencies where appropriate;
- avoid accepting explanations uncritically;
- remain alert to disguised compliance; and
- seek advice where uncertainty exists.

Voice of the Child

InterAct recognises the importance of hearing and understanding the voice, wishes, feelings, communication needs, and lived experiences of children and young people.

Children should:

- be listened to respectfully;
- be taken seriously;
- be supported to communicate in ways appropriate to their needs;
- feel safe to raise concerns;
- be involved in safeguarding decisions where appropriate; and
- receive explanations appropriate to their age and understanding.

InterAct recognises that some children may face barriers to communication or disclosure, particularly:

- children with SEND;
- neurodivergent children;
- children experiencing trauma;
- children with communication differences;
- children with mental health difficulties; or
- children experiencing exploitation or coercion.

Neurodivergence, SEND, and Increased Vulnerability

InterAct recognises that children with SEND and neurodivergent children may experience increased vulnerability to abuse, neglect, exploitation, bullying, coercion, isolation, discrimination, and online harm and recognises that:

- communication differences may affect disclosure;
- sensory needs and anxiety may affect behaviour and presentation;
- some children may be more trusting or vulnerable to manipulation;
- children may struggle to recognise abuse or unsafe relationships;
- behavioural changes may indicate safeguarding concerns rather than solely disability-related needs; and
- safeguarding concerns may be overlooked or minimised.

InterAct will seek to:

- maintain accessible communication;
- use trauma-informed approaches;
- consider communication and sensory needs;
- ensure safeguarding responses remain child-centred;
- avoid discriminatory assumptions; and
- ensure all safeguarding concerns are taken seriously.

Multi-Agency Working and Information Sharing

InterAct recognises that safeguarding is everyone's responsibility and that effective safeguarding depends upon:

- timely information sharing;
- professional challenge;
- collaborative working; and
- effective multi-agency safeguarding practice.

InterAct will work collaboratively with:

- Children's Social Care;
- Essex Safeguarding Children Partnership;
- Police;
- education providers;
- health professionals;
- commissioners;
- safeguarding professionals; and
- other relevant agencies.

Information sharing should be:

- lawful;
- necessary;
- proportionate;
- timely;
- relevant; and
- focused on protecting children from harm.

Consent is not always required where:

- there are safeguarding concerns;
- there is risk of harm; or
- disclosure is otherwise legally justified.

Please see the "Do I Need Consent" section below for further information on where consent is needed and where it can be overridden.

Where professionals disagree regarding safeguarding action, InterAct supports respectful professional challenge and escalation.

Low-Level Concerns

InterAct recognises the importance of identifying and responding to low-level concerns about adults working with children.

Low-level concerns may not meet the threshold for referral to statutory agencies, but may indicate:

- unsafe practice;
- poor professional boundaries;
- emerging safeguarding concerns; or
- patterns of inappropriate behaviour.

All low-level concerns should be:

- reported promptly;
- recorded appropriately;
- reviewed proportionately; and
- considered alongside other information where relevant.

Where appropriate, disciplinary action will be taken.

InterAct recognises that:

- multiple low-level concerns may collectively indicate significant safeguarding risk;
- early reporting may prevent harm; and
- safeguarding culture depends on openness and accountability.

Individuals raising genuine safeguarding concerns in good faith will not be treated unfairly for doing so.

Serious Incident Reporting

InterAct recognises that serious safeguarding incidents may require reporting to:

- the Charity Commission;
- Children's Social Care;
- Police;
- Local Authority Designated Officer (LADO);
- safeguarding partnerships;
- commissioners;
- insurers; or
- other regulators or statutory agencies.

Trustees and senior management will consider whether safeguarding concerns meet the threshold for Charity Commission Serious Incident Reporting.

Procedures

Early Help

InterAct recognises the importance of identifying concerns early and providing support before problems escalate or children become at risk of significant harm.

Early help means providing support as soon as concerns emerge in order to:

- improve outcomes for children and families;
- reduce escalation of difficulties;
- support well-being, safety, development, and resilience; and
- prevent concerns from developing into more serious safeguarding issues.

Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child who:

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

Where appropriate, InterAct may:

- discuss concerns with parents or carers;
- support signposting to appropriate services;
- contribute to multi-agency early help arrangements;
- participate in Team Around the Family or similar meetings;

- share information lawfully and proportionately; and
- refer concerns to local early help services or safeguarding agencies where appropriate.

InterAct recognises that:

- Early help is **not** a substitute for safeguarding action where a child is at risk of significant harm; and
- Concerns should be escalated immediately to safeguarding services where local thresholds are met.

Where uncertainty exists regarding thresholds or appropriate action, staff and volunteers should seek advice from safeguarding leads or statutory safeguarding professionals.

Responding to Low-Level Concerns

All low-level concerns must be reported to the Designated Safeguarding Lead (DSL) or Deputy DSL as soon as possible.

The individual reporting the concern should:

- explain what they observed or were told;
- provide factual information only;
- avoid speculation or assumptions; and
- provide dates, times, witnesses, or other relevant details where possible.

The DSL or Deputy DSL will:

- review the concern promptly;
- decide whether further information is needed;
- consider whether there are any patterns of behaviour or previous concerns;
- decide whether the concern remains a low-level concern or requires escalation;
- record the concern and any actions taken; and
- decide whether advice, supervision, monitoring, safeguarding action, disciplinary action, or further investigation is required.

Where necessary, the DSL or Deputy DSL may also seek advice from safeguarding professionals where it is not clear if the threshold has been met.

Making a Safeguarding Report to the Local Authority

- If you have an **immediate** safeguarding concern, call 0345 603 7627 and ask for the priority line. This phone line is open Monday to Thursday, 9 am to 5:30 pm, and Fridays, 9 am to 4:30 pm.
- Out of hours or bank holidays, call the emergency duty team on 0345 606 1212.
- You can also report a level 3 or 4 concern using the online [Request for Support form](#) on the Essex County Council website.
- For advice and guidance, call the Children and Families Hub on 0345 603 7627.

Guidance - Dealing with Disclosures

- Listen carefully to what you are told without displaying shock or disbelief.
- Ask open questions which will encourage the child/young person to talk openly.
- Do not 'fill in the blanks' or add your own words or thoughts.
- If you can, take notes, but if this will stop the child/young person talking, stop and take notes as soon as possible afterwards and be as accurate as you can.
- Do not criticise the perpetrator.
- Do not touch the child or young person to comfort or reassure them.
- Do not ask the child or young person to repeat it all for another colleague.
- Explain what you have to do next and who you have to talk to, but ask the person what they would like to happen and encourage them to accept the steps that have to be taken next. **DO NOT** make promises that you may not be able to keep, e.g. 'everything will be alright' or 'I won't tell anyone', and **NEVER** promise confidentiality.

In an emergency (if a child is in immediate danger), always contact the police by dialling 999.

Should I Get Consent?

Safeguarding concerns about children must always be taken seriously and acted upon promptly. In most cases, you do not need the child's consent to report a safeguarding concern.

It is always better to (where appropriate and safe), explain to the child what you are going to do and why, using language they can understand. If they are a young person, you may even ask for their consent, but never promise confidentiality.

The welfare of the child is the paramount concern (Children Act 1989), and if a child is at risk of significant harm, you have a legal and moral duty to report the concern, regardless of whether the child or young person agrees.

You may also make a referral without consent if a crime may have been committed or there is a risk to other children or vulnerable adults. Remember, data protection legislation does **not** stop you from making a report where necessary – in fact, it includes provisions to enable sharing.

Should I tell the parents/guardians?

Best practice shows that parents/guardians should be notified of the intended referral if the organisation has contact with them, and it is appropriate to do so, although only if doing so would not put the child or young person at further risk of harm.

The following are circumstances where disclosure to the parent or guardian is **not** appropriate:

- Where sexual abuse or sexual exploitation is suspected.
- Where organised or multiple cases of abuse are suspected.
- Where Fabricated or Induced Illness is suspected.
- Where Female Genital Mutilation is the concern.
- In cases of suspected Forced Marriage.
- Where it would place a child or young person, yourself, or others at immediate risk.

Managing Allegations Against Our Staff

All allegations of abuse by staff, both present and historical, must and will be taken seriously.

Any and all reports received must immediately be reported to the Service Manager, DSL or Deputy DSL.

The LADO (Local Authority Designated Officer)¹ must be contacted within one working day in respect of all cases (whether at work or outside of work) in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Following the report, the DSLs (or person appointed by the Board of Trustees) will carry out a thorough and impartial investigation into the allegation. We will at all times ensure that we follow the advice of the LADO where we have contacted them, so as not to jeopardise any formal investigation.

In the short term, consideration may be given to suspending or amending the duties of the accused. All staff who are subject to such action will be offered appropriate support until the investigation is concluded. The staff member's rights, including fair treatment and confidentiality, will be upheld throughout the process.

Once the investigation is complete, the findings will be documented and provided to the appropriate authorities, including LADO, Police, etc.

If the allegation is sustained, appropriate action will be taken in line with internal policies and legal requirements (including referral to the Disclosure and Barring Service (DBS) where appropriate).

If the allegation is unfounded, the staff member's rights, reputation, and well-being will be appropriately considered.

Record Keeping

All safeguarding concerns, disclosures, allegations, incidents, accidents, injuries, behavioural concerns, low-level concerns, body map recordings, and actions taken must be recorded appropriately using InterAct's safeguarding documentation, including:

- Incident Forms;
- Body Maps; and
- any associated safeguarding records or reporting systems used by InterAct.

Records should:

- be completed as soon as possible after the concern, incident, disclosure, or observation;
- contain factual, accurate, and objective information only;
- clearly distinguish between fact, observation, and opinion;

¹ Call 03330 139 797 or email lado@essex.gov.uk

- include dates, times, locations, and names of individuals involved where known;
- record the exact words used by the child or young person where relevant;
- include details of injuries, behaviours, disclosures, or concerns observed;
- record actions taken and referrals made;
- record who the concern was reported to and when; and
- be signed, dated, and stored securely.

Safeguarding records will normally be:

- treated as confidential;
- stored securely on the Teams Drive;
- accessed only by authorised individuals on a need-to-know basis; and
- managed in accordance with safeguarding, confidentiality, and data protection requirements.

The Designated Safeguarding Lead (DSL) and Deputy DSL are responsible for ensuring:

- safeguarding records are appropriately maintained;
- records are reviewed where necessary;
- referrals and actions are documented appropriately; and
- safeguarding information is retained and shared lawfully and proportionately.

Where safeguarding concerns are escalated to external agencies, copies of relevant records may be shared where necessary to protect children and young people from harm.

Confidentiality and Data Protection

InterAct will ensure that staff will read our Data Protection and GDPR Policy and abide by it, whilst understanding that these laws are not barriers to sharing information in many cases.

Non-Compliance

Failure to comply with this policy may:

- place children or young people at risk of harm;
- undermine safeguarding arrangements;
- expose InterAct to legal, safeguarding, reputational, or regulatory risk; and
- result in disciplinary or other appropriate action.

Concerns relating to safeguarding practice, unsafe behaviour, or failure to follow safeguarding procedures must be escalated promptly through appropriate safeguarding or whistleblowing arrangements.

Monitoring and Review

InterAct will monitor safeguarding arrangements through:

- safeguarding oversight;
- incident reviews;
- supervision;
- governance oversight;
- safeguarding audits;
- complaints and feedback;
- safeguarding reporting;
- risk management processes; and
- policy review arrangements.

This policy will be reviewed at least annually, or sooner, where:

- legislation or safeguarding guidance changes;
- safeguarding reviews identify improvements;
- significant incidents occur;
- organisational arrangements change; or
- emerging safeguarding risks are identified.

This policy will be made available in other formats upon request, and InterAct stakeholders are encouraged to speak to any member of staff if they have any questions or require clarification.

Appendix A: Safeguarding Code of Conduct

You must:

- treat all children and young people with respect
- provide an example of good conduct you wish others to follow
- ensure that, whenever possible, there is more than one adult and/or peer volunteer present during activities with children and young people, or at least that you are within sight or hearing of others
- respect a young person's right to personal privacy
- encourage young people and adults to feel comfortable and caring enough to point out attitudes or behaviour they do not like
- remember that someone else might misinterpret your actions, no matter how well-intentioned
- be aware that any physical contact with a child or young person may be misinterpreted – so only make physical contact where necessary and preferably with consent
- recognise that caution is required when you are discussing sensitive issues with children or young people
- operate within InterAct's Safeguarding Children and Young People Policy and linked policies
- challenge unacceptable behaviour and report all allegations/suspicions of abuse
- maintain appropriate dress and personal appearance when working
- give guidance and support to less experienced staff and volunteers

You must not:

- have inappropriate physical, verbal, phone, text or online contact with children or young people
- allow yourself to be drawn into inappropriate attention-seeking behaviour
- make suggestive, inappropriate or derogatory remarks or gestures in front of children or young people, or their parents/carers
- jump to conclusions about others without checking facts
- show favouritism to any individual
- either exaggerate or trivialise child abuse issues
- rely on your good name or that of InterAct to protect you
- believe "it could never happen to me"
- take a chance when common sense, policy or practice suggests another more prudent approach
- disclose your home address or personal phone numbers
- share inappropriate information about personal lives
- arrange to meet children, young people, their parents or vulnerable adults socially

If any of the following occur, you should report this immediately to a manager and record the incident:

- If you accidentally hurt a child or young person
- If a child or young person seems distressed in any manner
- If a child or young person appears to be sexually aroused by your actions
- If a child or young person misunderstands or misinterprets something you have done

Where appropriate, you (or a colleague) should also ensure the parents/carers of the child are informed.

Appendix B: Additional Information for Parents

If, following an arrangement made through InterAct, your child has an injury you think may not be accidental, or you are not happy with the explanation given, or should you suspect your child has been harmed or abused in some way:

Make a written note of why you are concerned, what your child said about the incident, and about any subsequent conversations with InterAct staff or volunteers on the matter. If you are unhappy or not satisfied with the explanations or information given to you, you should note the reasons why and either:

- Contact the InterAct (01245 392053) and speak to our Designated Safeguarding Lead or Deputy Safeguarding Lead; or
- Contact the Children & Families Hub (0345 603 7627)

If you contact Social Care via the Children & Families Hub, they will decide whether to carry out an investigation under their Safeguarding/Child Protection Procedures. The form of this investigation will depend upon the nature of the injury or concern. It is likely that it will include the appointment of a key worker by Social Care, who will have overall responsibility for coordinating the investigation.

If you contact InterAct, the Designated Safeguarding Lead or their Deputy will likely contact Children's Social Care, who will then decide what further action is required.

Please Note:

- InterAct welcomes feedback and comments from those you access our services and their parents/carers, and we aim to ensure that any concerns or difficulties raised are resolved effectively.
- Informal feedback and suggestions are welcome at all times - please speak or write to your usual contact at InterAct, or use one of the project feedback mechanisms.
- If you have any concerns or comments about our services, which InterAct needs to address more formally, you should contact InterAct to discuss your concerns.
- If there are concerns or difficulties which cannot be resolved to your satisfaction, the Comments, Compliments & Complaints Policy will be followed. Copies are available from the charity office.

Appendix C: Specific Guidance Relating to Residential Trips

InterAct appreciates the value of residentials, particularly those at outdoor activity centres, in supporting the personal and social development of young people.

Staff should always consider the additional risks to young people during these activities, including their individual support needs and potential vulnerability, particularly overnight, and take appropriate actions to minimise such risks.

Before the activity:

- Full consent forms should be circulated to families and returned in sufficient time for individual needs and risks to be documented and considered.
- Site visits must be undertaken prior to the visit if the site has not been used by InterAct or if key staff are unfamiliar with the site.
- Information and risk assessments should be requested from the Centre, so any specific risks to participants can be considered in advance.
- Staffing levels should be agreed: paid staff, volunteers and individual personal assistants (PA) support for participants (including overnight arrangements). Consideration should be given to rest periods and the needs of the staff/volunteers/Pas.
- Briefing session/information for participants and parents/carers to be held where appropriate, to enable any individual concerns to be raised and addressed.
- DBS disclosures for any PAs should be seen by staff, where these have not been carried out by InterAct.
- Risk assessments should be completed, covering group arrangements and individual needs/risks, medication requirements and storage, and any contingency plans, including reserve/replacement staff. This is to be agreed by all staff involved and signed off by a senior manager.

During the activity:

- Qualified instructors will be responsible for ensuring safety during planned activities, following their own procedures, but InterAct staff and volunteers have a key role in supporting them, to ensure safe and appropriate behaviour by participants, and responding to any individual needs which may arise.
- InterAct staff and volunteers should work with Centre staff to ensure young people are ready, able and supported to participate in the programme as planned. InterAct staff and volunteers will also be responsible for support and supervision of young people during 'free time', including overnight.
- Individuals should have privacy for changing, washing, etc., although it is acknowledged that individual PAs or staff may need to give appropriate support for this or other personal care needs to the young person in their care.

Overnight arrangements:

- Accommodation will usually be provided for each sex with individual requirements, including those relating to gender differences, considered positively and respectfully.
- Attention needs to be given to safe access for the children/young people to adult leaders and to toilet facilities during the night.
- Adults should sleep in separate, adjacent sleeping quarters, unless where individuals are identified as being vulnerable overnight, for their own health and well-being, or because of the potential risk they may pose to others if unsupervised, it may be appropriate for a member of staff, a volunteer or PA to sleep in the same room. These arrangements should be discussed and agreed in advance with the parents/carers involved, and noted in the risk assessment. If such arrangements are needed due to unforeseen circumstances, parents/carers should be contacted and verbal consent obtained.

Accidents and Incidents during residential activities

- Any incidents occurring should be reported immediately to the InterAct Lead Youth Worker and to the Centre. A written Accident and Incident report should be completed as soon as possible.
- If the incident is serious or impacts the safe continuation of the activity, the InterAct Lead Youth Worker should contact a Senior Manager for advice. This may include asking the individual to leave the activity. Arrangements should then be made to ensure that the individual can return home safely.

References

- [Working Together to Safeguard Children](#)
HM Government statutory guidance on safeguarding and multi-agency working.
- [Keeping Children Safe in Education](#)
Department for Education safeguarding guidance and best practice for organisations working with children and young people.
- [Essex Safeguarding Children Board \(ESCB\)](#)
Local safeguarding procedures, threshold guidance, and safeguarding resources for Essex.
- [Charity Commission Safeguarding and Protecting People for Charities and Trustees](#)
Charity Commission safeguarding responsibilities and governance expectations.
- [Charity Commission Serious Incident Reporting Guidance](#)
Guidance on reporting serious safeguarding and governance incidents to the Charity Commission.
- [Information Sharing Advice for Safeguarding Practitioners](#)
Government guidance on lawful and proportionate safeguarding information sharing.
- [NSPCC Safeguarding and Child Protection Standards and Guidance](#)
Safeguarding practice guidance, resources, and learning materials.
- [UK Council for Internet Safety \(UKCIS\) Guidance](#)
Online safety guidance and emerging digital safeguarding risks.
- [Prevent Duty Guidance](#)
Guidance relating to preventing radicalisation and extremism.
- [Disclosure and Barring Service \(DBS\) Guidance](#)
DBS eligibility, safer recruitment, and barring guidance.
- [Children Act 1989 Legislation](#)
- [Children Act 2004 Legislation](#)
- [Children and Social Work Act 2017 Legislation](#)
- [Safeguarding Vulnerable Groups Act 2006 Legislation](#)
- [Counter-Terrorism and Security Act 2015 Legislation](#)
- [Data Protection Act 2018 Legislation](#)
- [Equality Act 2010 Legislation](#)
- [Human Rights Act 1998 Legislation](#)

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