



SAFEGUARDING CHILDREN POLICY & PROCEDURES

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Abbreviations used in this document	Meaning
CSC	<i>Children's Social Care</i>
DH	<i>Department of Health</i>
LAC	<i>Looked After Child</i>
LSCP	<i>Local Safeguarding Children Partnership</i>
LADO	<i>Local Authority Designated Officer</i>
MASH	<i>Multi Agency Safeguarding Hub</i>
SGC	<i>Safeguarding Children</i>
CYP	<i>Children and Young People</i>
RBKC	<i>Royal Borough of Kensington and Chelsea</i>
DSL	<i>Designated Safeguarding Lead for the Charity</i>

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1. Policy Statement

All children and young people (CYP) have the right to protection from any kind of abuse and the right to be in a safe and friendly environment whilst in the care of Nova New Opportunities. We are committed to providing, as far as is reasonably practicable, an environment that is safe from any kind of harm, for all those under the age of 18 years at all locations used by the charity. We will give equal priority to keeping all children and young people safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

We aim to achieve this by:

- Ensuring our policies and procedures are in line with local and national guidelines and legislation.
- Having effective systems in place ensuring that our facilities, procedures and activities take account of the children and young peoples' health, safety and welfare requirements.
- Following safer recruitment procedures carefully, for all staff, ensuring the suitability of all staff to work with CYP under the age of 18.
- Requiring all relevant staff to have completed Local Safeguarding Children's Partnership's (LSCP) Level 3 safeguarding children training, which is required to be updated every three years.
- Providing effective management for staff through supervision, support and ongoing training.
- Ensuring CYP have a clear channel of communication in time of need.
- Ensuring that we take into account the needs and backgrounds of all students as much as possible.

- Making clear to the children, young people and staff what constitutes aggressive and racist behaviour and that it will not be tolerated.
- Ensuring that all staff understand general child safeguarding principles and that a copy of the Nova New Opportunities Safeguarding Children Policy is provided during induction and on the Charity's website.

This policy will be reviewed and updated every year by the Senior Management Team of Nova New Opportunities: Director and Department Heads, including the Designated Safeguarding Lead and Head of Impact Measurement and Compliance, and ratified by the Trustees.

1.1 Nova New Opportunities supporting policies and procedures

- **Home Visits Policy**
- **Online Safety Policy**
- **Prevent Duty Policy**
- **Health and Safety Policy**
- **Equality and Diversity Policy**
- **Confidentiality and Data Protection Policy**

Copies of the above policies are available on our website: <https://novanew.org.uk/policy-documents>

The following policies, staff guidance and other internal documents are available on request:

- **Complaints and Grievance Procedure**
- **Whistleblowing Policy**
- **Code of conduct for staff, students and volunteers**
- **Role description for the Designated Safeguarding Lead**
- **Photography and Sharing Images**
- **Anti-bullying policy**

2. Introduction

The purpose of this document is to specify Nova's Safeguarding policy and procedures for the protection of children and young people. In this document, a child is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout.

Nova New Opportunities is a voluntary organisation and this policy should be read by all Trustees, Staff, Volunteers and Ambassadors working with or alongside children accessing activities provided by Nova New Opportunities (also referred to as 'the Charity'). This policy relates to all children and young people in our care regardless of gender, age, ethnicity, nationality, religion or disability.

The Charity provides online, after-school, weekend, school holiday and residential activities for children and young people and for families. Some activities are delivered on and offsite. All adults working with or alongside children for the charity refers to staff and all volunteers. For the purpose of this document, 'Staff' refers to those paid employees of Nova New Opportunities. 'Volunteers' refers to all others working for the charity and may include (but are not limited to) mentors and helpers.

Safeguarding and promoting the welfare of children and young people is defined for the purposes of this policy as:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Safeguarding is the responsibility of everyone. The policy and procedures apply to all of Nova's activities. The document applies to all Nova staff, including tutors, trustees and volunteers.

All adults who come into contact with children and young people in their work have a duty of care to safeguard and promote their welfare. Child protection refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

The Children Act 2004 places a duty on organisations to safeguard and promote the well-being of children and young people. This includes the need to ensure that all adults who work with or on behalf of children and young people in organisations are competent, confident and safe to do so.

[Guidance for Working Together to Safeguard Children, December 2023](#)

3. Responsibilities

The implementation of this policy is mandatory across all areas of the Charity. Any behaviour by a Trustee, member of staff, apprentices, volunteer, freelancer or consultant that contravenes the terms of this policy and procedure may be considered for disciplinary action, which in turn may lead to dismissal for staff and ending of contracts for apprentices, volunteers, freelancers and consultants or for Trustees being removed from the Trustee Board. Specific responsibilities are outlined below:

3.1 Director and Leadership Team

The Director is ultimately responsible for the implementation of the Charity's Safeguarding Policy and Procedures. The Leadership Team will ensure the policy and its accompanying procedures and practice guidelines are implemented across their functional areas of responsibility. The Designated Safeguarding Lead will report to the Leadership Team on any safeguarding and/or child protection issues, which arise.

The Director and Leadership Team are responsible for ensuring:

- the resource available to support staff on safeguarding/child protection issues is maintained.
- that safeguarding implications are constantly reviewed across the scope of the work the Charity delivers to young people, and are fully considered in the development of all new pieces of work.
- the continued development of Charity's approach to Safeguarding, considering and authorising any immediate changes in operational policy required due to a safeguarding incident or near miss.
- safeguarding is considered in all appointments of staff.
- Training of staff is delivered as regularly as is necessary for department needs.

3.2 Line Managers

Line Managers are responsible for:

- ensuring that staff, trustees and volunteers are able to discuss safeguarding, child protection and abuse issues confidentially and receive guidance and support on action if situations arise.
- ensuring the Safeguarding policy is fully implemented locally and that procedures to support the policy are set up as outlined, complied with and communicated.
- ensuring the referral of all safeguarding, child protection issues to the Designated Safeguarding Lead.
- ensuring all reporting staff are aware of their roles and responsibilities under this policy. This must form part of their induction.
- ensuring staff and volunteers undertake appropriate and required induction and training in safeguarding/child protection, at the required level relevant to their role.
- ensuring all new staff members and volunteers have the required disclosure certificate in place if engaging in regulated activity with young people and that they cooperate with the internal DBS procedure to include checking ID and provision of signed copies of documents with application forms to HR.

3.3 Trustees, staff, volunteers, and consultants

All Trustees, staff, volunteers and consultants are expected to understand and adhere to the requirements of this policy and procedures and operate within codes of conduct outlined within the various policies that support the work of the Charity.

4. Procedure

4.1 Recruitment of Employees

All staff involved in staff recruitment should a) attend an RBKC Safer Recruitment and b) successfully complete Level 3 Safeguarding Training. New starters should not commence in their role, until receipt of completed pre-employment checks.

4.1.10 Induction Programme

All new employees will be given an induction programme which will clearly identify the Charity's relevant policies and procedures, including the Safeguarding Children Policy and make clear the expectation and codes of conduct which will govern how staff carries out their roles and responsibilities. All staff and volunteers will be signposted to where they can access all policies.

4.1.2 Job Descriptions and Person Specifications

Nova New Opportunities requires all staff including volunteers to fill out a job application form upon application. It, like our interview process, clearly and accurately sets out the duties and responsibilities of the job role. The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job.

4.1.3 References

References for short listed applicants will be sent for immediately after an offer has been made. Two FULL professional/character references must be provided. These will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. The reference request will include a specific reference to suitability to work with children. Any discrepancies or anomalies will be followed up. The Charity will not accept open references, testimonials or references from friends or relatives.

4.1.4 Interviews

There will be a face-to-face interview for all roles. The interview process will explore the applicant's ability to carry out the job description and meet the person specifications. Any information in regard to past disciplinary action or allegations, cautions or convictions, will be discussed and considered in the circumstance of the individual case during the interview process.

4.1.5 Offer of Appointment and New Employee Process

The appointment of all new employees is subject to the receipt of a satisfactory DBS Certificate, references, and original documentation of qualifications, right to work and proof of

identity; photocopies will be taken. A personal file checklist will be used to track and audit paperwork obtained in accordance with guidance from the safeguarding sector.

4.1.6 The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to children. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at Nova New Opportunities.

4.1.7 DBS (Disclosure and Barring Service) Certificate

All employees and volunteers engaged in a Regulated Activity must hold a valid DBS certificate, checked against the relevant barred list and an enhanced Disclosure will be required.

Nova New Opportunities will accept pre-existing DBS certificates provided that they are up-to-date and registered on the Update Service, and at the required level for the appropriate workforce.

If employees are not registered on the Update Service, then it is our policy to re-check all employees as a condition of employment. The Charity encourages staff to sign up for the DBS Update Service. Volunteers will be supported in signing up for the Update Service by a member of the Safeguarding Team or the Office Manager. This service is free for volunteers.

In mitigating circumstances, as an interim measure and with the approval of SMT, Nova New Opportunities may accept transferability of some pre-existing DBS certificates, provided they have been issued in the last 3 months, the certificate is verified and issued for the same workforce and of the same type and level of criminal record check.

4.1.8 Dealing with convictions

All staff must sign a declaration of suitability to work with children at application stage. The Charity operates a formal procedure if a DBS Certificate is returned with details of convictions. The recruiter, in discussion with the Management team, will discuss the facts relating to the above, and then a decision will be made.

4.1.9 Overseas Checks

All new employees where persons have lived outside the UK are subject to additional checks; a 'Certificate of Good Conduct' or 'Police Certificate' will be required from the applicant's country of residence and are subject to additional checks by DBS services.

4.1.10 Record Retention / Data Protection

The Charity will retain all interview notes on all applicants for a period of 6 months, after which time the notes will be destroyed. The 6-month retention period is in accordance with the Data Protection Act 2018 and UK GDPR and will also allow the Charity to deal with any data access requests, recruitment complaints or to respond to any complaints made to an Employment Tribunal. All information retained on employees is kept centrally in the HR Office in a locked and secure cabinet.

4.2 Other People involved with Nova New Opportunities including Visitors

In addition to contracted employees, it is recognised that Nova New Opportunities engage a wide range of volunteers, mentors and helpers to support in their activities with children. Where necessary, volunteers will also undergo DBS checks prior to any contact with children; this is not necessary in the majority of our activities where parents are present.

Visitors, including interviewees and parents/carers, are required to sign in to any Nova New Opportunities activity in which they are present. They must wear a lanyard identifying themselves to others as a visitor. These badges should be visibly different to those of the Nova New Opportunities staff in order for them to be easily distinguished. They should be accompanied at all times and never be left unattended with the children.

4.3 Working with Children and Young People

Nova requires all those working directly with children, young people and adults at risk on behalf of the charity in any situation to follow the procedures below, in order to create a safe environment in which to work with them.

4.3.1 General guidance for safe working practice

- Staff working with children and young people should:
 - ✓ be appropriately trained and qualified to ensure the safe provision of services, coaching and use of equipment.
 - ✓ carefully plan sessions with the care and safety as their primary concern including the use of appropriate activities.
 - ✓ keep an attendance register for all organised sessions and activities.
- Staff must give due regard to issues of safety at all times. This includes carrying out appropriate risk assessments before all sessions and activities. Due regard should be given to the potential influences and associated risks that different groups may have on each other.
- Staff and volunteers are responsible for familiarising themselves with building/facility safety issues, such as, fire procedures, location of emergency exits, location of emergency telephones and first aid equipment.
- Where children and young people are not accompanied by parents/carers, recommended staff supervision ratios must be followed: aged under 2 years (1:3), 2 - 3 years (1:4), 4 - 8 years (1:6), 9 - 12 (1:8) and 13 - 18 years (1:10).

It is recommended that, even if the ratio only requires one adult, there is a minimum of two staff with legal responsibility present at all times for children under eight years old.

- Wherever possible, staff should avoid being alone with children and young people. Staff shouldn't offer a lift to a child, young person or adult at risk unless they have written parent/carer consent, or a second adult is present.
- Parental consent and medical information about the child or young person at risk must be obtained in advance when Nova is working directly with, and has responsibility for, them. Staff who are accompanying children and young people should have obtained appropriate parental consent and medical information about them prior to the activity or event. Staff should have access to Information and Parental Consent Forms for all children taking part in sessions and this information should be treated as confidential and is governed by the provisions of Data Protection regulations.

- Children and young people and their parents/carers should be given a 'named appointment' to whom they may report any worries or concerns. The contact names and telephone numbers should be visibly displayed at events.
- Staff should ensure that programmes follow agreed timings and locations
- Staff are expected to promote and incorporate the values of fairness, trust and ethical practice and demonstrate respect and tolerance for all people, with particular regard to the protected characteristics of the Equality Act (2010).
- Staff should behave and dress in a manner that promotes recognised good practice in relation to safeguarding.
- All accidents/incidents involving staff or participants should be recorded using the Charity's accident forms immediately or as soon as practicably possible.
- All staff are responsible for reporting suspected cases of child abuse to the appropriate people in accordance with the guidelines in [Section 4.5](#).

4.3.2 Guidance on Physical Contact with Children

It is Nova New Opportunities' policy to **advise against physical contact with children and young people**. However, we recognise that there may be circumstances where this is unavoidable, and some exceptions exist (see [Appendix B for further guidance](#)), but it is crucial that staff only do so in ways appropriate to their professional role. Staff must abide by the terms of the Equality Act (2010) and the Children Act (1989). Failure to do so may result in disciplinary action and if necessary, referral to outside authorities.

4.3.3 Risk Assessments and Procedures for all trips and activities

It is essential that children are provided with safe and secure environments whilst engaging in activities with Nova New Opportunities. The Charity needs to ensure that, as well as conducting formal risk assessment, they constantly reappraise both the environments and activities to which children are being exposed and make necessary adjustments to ensure their safety at all times.

Whilst staff should make every effort to undertake due diligence to minimise the risks within other agencies and organisations to whom they may signpost children and young people, if Nova is not directly involved in the delivery of a signposted activity delivered by another organisation then parents and carers should be aware that safeguarding and risk assessment is wholly the responsibility of the signposted organisation and to permit and approve the participation of their children and young people accordingly.

See [Appendix E for Risk Assessment Tools](#) and our [Health and Safety Policy](#) for further guidance relating to regarding risk assessments and procedures.

4.3.4 Online Safety

Nova recognises that safeguarding responsibilities apply equally to online and in-person delivery. Online environments present specific risks to children and young people, including inappropriate contact, grooming, exposure to harmful content, and breaches of privacy. This section outlines the mandatory standards and procedures that ensure safe, secure and professional online delivery in line with statutory guidance, including *Keeping Children Safe in Education*, UKCIS guidance, and Nova's Online Safety Policy.

Staff Responsibilities and Training

- All staff delivering online sessions must receive **online safeguarding induction and training** before any session can take place.
- Staff must be familiar with and follow the procedures set out in Nova's **Online Safety Policy** and **Online Sessional Delivery Risk Assessment**.
- All online activity is subject to the same safeguarding standards as offline delivery, including **enhanced DBS requirements, professional boundaries, reporting obligations, and CPOMS recording**.

Online Delivery Standards

- Only **Nova's professional Zoom account** may be used. Staff must log in using their Nova email address.
- **Tracked attendance** must be enabled and records retained for safeguarding and monitoring purposes.
- **Waiting rooms must be enabled** for all meetings to control entry and ensure only authorised children are admitted.
- **Direct private messaging** between staff and children must be disabled at all times.

Supervision and Child Protection

- A staff member must **never be alone online with a single child**.
 - A minimum of **three children must be present** before a session can proceed with one member of staff.
 - If the number falls below three during the session, the session must be paused until another child joins, and the remaining children must be placed in the waiting room or until another supervising member of staff joins.
- This requirement is in place to protect both the child and the staff member and ensure no one-to-one online situation arises unless a pre-approved safeguarding or pastoral protocol is in place with parental consent and recorded supervision.

Environment and Professional Conduct

When delivering online learning or live streaming sessions with young people only, staff must:

- Ensure **parental/carers consent** has been obtained for all participants aged under 18, along with full contact details of parent/carers, either at programme or project registration.
- Use a **neutral and professional background**, free from personal items or identifying information.
- Ensure no other adults are visible or audible during delivery.
- Dress appropriately and maintain professional boundaries at all times.
- Maintain full control of screen-sharing and use only approved materials.
- Not record sessions unless explicitly authorised, with parental consent and appropriate safeguards in place.

Parent/Carer Engagement

- Parents/carers are provided with **guidance on online safety** and encouraged to monitor and support their child's participation.
- The **Family Agreement** is provided to help families maintain safe digital environments at home.

Risk Assessment

- A **risk assessment is mandatory** for all online sessions involving children and young people.
- Nova's Online Sessional Delivery Risk Assessment template must be used and adapted to reflect the specific nature of the session.
- Safeguarding concerns that arise during online sessions must be reported immediately via CPOMS and escalated to the Designated Safeguarding Lead.

4.3.5 Complaints

Complaints brought by parents or carers will be investigated through the Charity's Complaints procedures.

Charity staff must follow agreed policy and procedures, ensuring good practice at all times; therefore, any complaints which are upheld due to inappropriate behaviour, disciplinary procedures will be commenced.

4.4 Photography, Social Media & Communications with young people

4.4.1 Guidance on Taking Photographs of Children

The taking of pictures of children and young people is restricted for legal reasons and many schools and other institutions have a policy on this. There are two reasons for our policy outlined below: firstly, the safeguarding of children in our care, and secondly, data protection regulations. Please refer to our Photography and Sharing Images policy.

Risks to Children

Children and families may be able to access any of your personal information you have shared on social media, some of which may be inappropriate and can compromise your relationship with that child or young person. By allowing children to 'connect' with an individual on social media inadvertently introduces them to a wider range of adults and content that may not be suitable.

Staff must not post any information, photographs or videos of children on their personal social media accounts. This may make that child vulnerable to inappropriate or unsuitable attention and is also in breach of Nova New Opportunities Safeguarding policy.

4.4.2 Communicating with Children or Families

Staff and volunteers should not engage in conversation or messaging with any child via social media or private messaging services. However, if staff need to communicate with children or

parents regarding changes to trips or plans, this should be done by the appropriate nominated Leader using:

- Generic email account.
- Nova New Opportunities mobile or office phones.
- Public social media account to communicate messages on a larger scale.

Please refer to our [Code of Conduct for Staff and Volunteers](#) for more information.

4.4.3 Raising concerns

If staff or volunteers become aware of any social media activity or incorrect usage from a child or young person or a member of staff/ volunteer that raises safeguarding concerns, the individual must report this immediately to the DSL.

- Where the incident or concern relates to a member of staff or volunteer, this must always be raised directly to DSL for advice and guidance.

4.5 Abuse and Neglect and Other Concerns

Abuse and **neglect** are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in different settings, for example in a family home or in an institutional or community setting. They may be abused by an adult or adults, parent or carer, another child or children or, more rarely, by a stranger.

Serious harm includes, but is not limited to, cases where the child has sustained, as a result of abuse or neglect, any or all of the following:

- A potentially life-threatening injury;
- Serious and/or likely long-term impairment of physical or mental health or physical, intellectual, emotional, social or behavioural development.

This definition is not exhaustive. In addition, even if a child recovers, this does not mean that serious harm cannot have occurred. Parental issues including domestic violence (DV), substance misuse and mental ill-health can contribute significantly to intentional or non-intentional abuse of children.

All staff and volunteers must be aware that the main categories of abuse are:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse

All staff and volunteers must act in accordance with this policy if a child he/she presents with indicators of abuse.

See [Appendix C](#) for further guidance in identifying [Signs of Abuse](#)

4.5.2 Dealing with Disclosures

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

If a CYP self-discloses a matter that constitutes a potential or alleged situation of abuse, the staff member must take the child or young person to a private place within view but out of ear-shot of other people. Promises of confidentiality must not be given. Tell the CYP that you have a duty to pass on the information, only to those who need to know.

Do not interview them, but ask what happened, keep questions to a minimum and obtain sufficient facts to understand what is being alleged. The following are some key Do's and Don'ts if a child or young person reports abuse:

Always:

- Stay calm – ensure the child or young person is safe and feels safe.
- Reassure the child that they have done the right thing by telling you.
- Listen carefully to what is said. Ask questions for clarification only and always avoid asking leading questions (such as those prompting a particular answer). Do not make assumptions or offer explanations.
- Make notes and as soon as possible after the event write up a detailed account of what you and the child or young person discussed.
- Allow the child or young person at risk to speak without interruption, at their own pace, accepting what you have been told (This should not be seen as believing or disbelieving what you have been told).
- Alleviate feelings of guilt and isolation, without passing any judgement.
- Reassure the child or young person and stress that they are not to blame, tell them that they are right to tell you and that you will try to offer support – but do not promise to keep it a secret and tell the child it is your responsibility to inform others.
- Tell the child or young person that you will try to offer support, but you are required to pass the information on. Tell them what you will do next and with whom the information will be shared.
- Speak with the Designated Safeguarding Lead for Child Protection, without delay.

Never:

- Rush into details that may be inappropriate.
- Make promises you cannot keep.
- Take sole responsibility – consult someone else so that you can protect the child or young person and gain support for yourself.
- Attempt to personally investigate any allegations of abuse as an allegation of child abuse may lead to a criminal investigation.

The same approach to receiving a disclosure must be taken if the discloser is not the allegedly abused child, but another child or an adult. Nova is a referrer, not an investigative agency for child protection matters. An incident may eventually end up as a court case and repeated recital. When the DSL has been informed, they will make the decision whether or not to refer the concern to Social Care. The Multi Agency Safeguarding Hub (MASH) will be consulted when there is uncertainty about whether to refer.

4.5.2 Bullying

We are committed to providing a caring, friendly and safe environment for all children and young people who come into contact with Nova New Opportunities. Bullying of any kind is unacceptable at any activity run by the Charity. If bullying does occur, all children and young people should be able to tell us and know that incidents will be dealt with promptly and effectively. Please refer to our Anti-Bullying policy for more details.

4.5.3 Radicalisation and Extremism

The threat from terrorism and extremism in the UK is real and severe and can involve the exploitation of vulnerable children, young people and adults at risk. Children and young people may be targeted by adults who hold extreme views that advocate violence and this may include involving them in extremist activity in the UK or abroad, putting them in extreme danger.

Radicalisation is a process by which an individual, or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or undermine contemporary ideas and expressions of a nation. Extremism is when people have very strong opinions, and these could become extreme. People who have certain beliefs about politics or religions which are hateful, dangerous or against the law are often known as extremists.

Nova staff, including trustees, volunteers and consultants working directly with children and young people must be aware of radicalisation and extremism and report any suspicions of radicalisation and extremism immediately to their Manager, Director or Designated Safeguarding Lead.

Nova staff will be expected to have completed Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Ideally, trustees, volunteers and consultants who are delivering services directly to children and young people will also have completed the Prevent awareness training however it is recognised this is not always practical and therefore a minimum requirement is that they have read this document and have acknowledged reading it.

See [Appendix D](#) For more information on our [Prevent Duty](#) and [Recognising the Signs of Radicalisation and Extremism](#)

4.6 Reporting and Recording Concerns

Nova has a statutory duty to ensure that any concern regarding the safety or wellbeing of a child or young person is reported immediately and handled in accordance with national safeguarding legislation. All staff, volunteers and sessional workers share responsibility for safeguarding. **Failure to report a concern is a breach of safeguarding policy and may result in disciplinary action.**

Key Principles

- ✓ Safeguarding concerns must be reported immediately — do not wait to gather full information.
- ✓ All staff are responsible for reporting, not investigating.
- ✓ CPOMS is the required system for safeguarding record-keeping.
- ✓ Confidentiality is paramount, but safeguarding overrides data protection where a child is at risk.

4.6.1 Reporting Procedure

If you are concerned that a child or young person may be at risk of harm, or a child discloses that they are being harmed or abused, you must immediately inform Your Line Manager and the Designated Safeguarding Lead (DSL) (or a Deputy DSL).

Concerns must be reported without delay, even if a full picture of the situation is not yet known.

If a child is in immediate danger or a criminal offence is suspected to be in progress, you must contact the police on 999 without delay, in addition to informing the DSL.

All concerns, disclosures and safeguarding incidents must be recorded at the earliest opportunity on Nova's Child Protection Online Monitoring System (CPOMS).

4.6.2 Recording on CPOMS

CPOMS is Nova's secure electronic safeguarding reporting system used to record, store and manage all safeguarding concerns. All staff receive CPOMS training as part of induction and ongoing safeguarding training. Once trained to use CPOMS, all staff receive a personal login.

Staff Must: Submit a CPOMS entry as soon as possible after a concern or disclosure is identified, using the child's exact words in quotation marks where applicable.

- Include the date, time, location and any witnesses present.
- Describe any injuries observed (do not photograph unless following explicit safeguarding protocol).
- Record only factual information; do not include opinion, assumptions or diagnostic language.
- Do not ask the child to write a statement
- Do not promise confidentiality.
- Do not question or investigate the allegation yourself.

All entries must be submitted to the DSL via CPOMS. The system automatically logs the identity of the reporting staff member and date/time of submission.

Once a report is submitted, the Safeguarding Team will agree next steps and the reportee will be notified or involved in the progress of their report as deemed appropriate. Further actions taken will be recorded by the DSL on CPOMS until the report is closed.

Decision Making and Escalation

Upon receiving a CPOMS report, the DSL (or Deputy DSL) will review the concern and determine whether:

- Further internal monitoring is required,
- Early help or support should be initiated,
- A referral to the local authority, police or other statutory agency is required.

Any decision and follow-up action will be recorded in CPOMS, including outcomes and next steps.

External Referrals

If a referral is required, the DSL will contact the appropriate external agency. The agency will then conduct its own investigation. Anonymity cannot be guaranteed once a referral is made. The DSL will remain the point of contact and will ensure records of all communications and actions are maintained on CPOMS. A safeguarding flowchart below (4.5.6 Safeguarding Flowchart) illustrates the reporting and possible escalation process.

4.6.3 Reporting Concerns about a Member of Staff or Volunteer

If you have safeguarding concerns regarding the behaviour or conduct of a member of staff or volunteer, you must follow the same reporting procedure outlined in this policy. However, you should escalate the concern to the line manager or the most senior appropriate person who is not implicated in the concern.

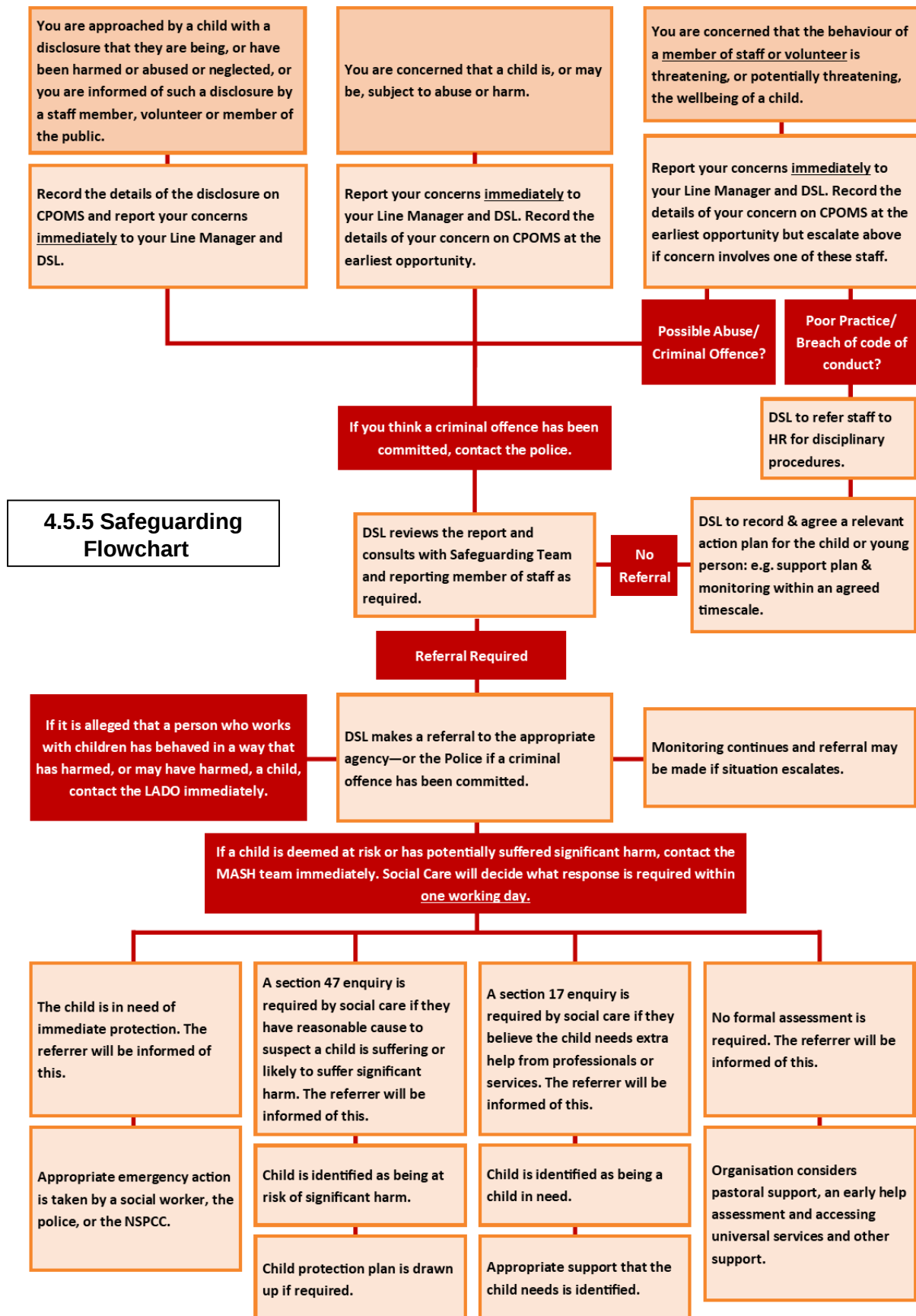
If the concern relates to a senior member of staff, it should be reported directly to the Director of the charity. Where the Director is involved or it is otherwise inappropriate to report internally, concerns should be referred immediately to the local safeguarding authority.

If you are not confident that appropriate action has been or will be taken within the organisation, you have the right and responsibility to report concerns directly to external safeguarding agencies. A list of current local safeguarding contacts is provided in Section 5 of this document.

For further guidance on raising concerns, including confidentiality and protection from reprisal, please refer to Nova's **Whistleblowing Policy** and **Complaints and Grievance Procedure**.

4.6.4 Storage and Confidentiality

- All safeguarding records are stored securely and confidentially within CPOMS.
- Access is restricted to the Designated Safeguarding Lead, Deputy DSLs, and the Director, all of whom have received DSL training.
- Any paper records received must be scanned and uploaded to CPOMS immediately; the original must be shredded to protect confidentiality.
- Records are stored in accordance with GDPR and safeguarding legislation.



5. Key Contacts

5.1 Nova New Opportunities contacts

Nova New Opportunities Director: **Lizzie Cho**, Lizzie Cho, 07780 463336, lizzie.cho@novanew.org.uk

Designated Safeguarding Lead: **Matthew Barnett**, 07771374522, matthew.barnett@novanew.org.uk

Deputy Safeguarding Lead: **Marija Mirazic**, 07985710989, marija.mirazic@novanew.org.uk

The following local authority organisations are responsible for key inter-agency forums for child protection, safeguarding assessments and decisions at level and are identified on local government websites:

- Social Services Departments
- Local Safeguarding Children Partnership (LSCP)
- Multi Agency Safeguarding Hub (MASH)

<https://www.rbkc.gov.uk/lscp/information-professionals-and-volunteers/useful-safeguarding-contacts-professionals>

5.2 Contacts for Safeguarding: Kensington and Chelsea

To report a concern, or for consultation or advice, about a child or young person resident in The Royal Borough of Kensington and Chelsea, contact the Social Services Duty Line:

Social Services Duty Line (During office hours, weekdays between 9am and 5pm):

Phone: 020 7361 3013

Hours: Monday to Friday, 9 am to 5 pm

Emergency Duty Team (Out of hours, between 5pm and 9am and on weekends):

Phone: 020 7373 2227

Hours: 5 pm to 9 am, and weekends

For immediate life-threatening emergencies, contact the police directly:

Phone: 999

For case consultations or Local Authority Designated Officer referrals, please contact the following:

Here are key safeguarding contacts for Royal Borough of Kensington & Chelsea (RBKC), grouped by department with clear reasons for why you might contact them:

Child Exploitation – Children's Services

Sarah Stalker (Child Exploitation Lead)

Telephone: 020 7598 4640

Mobile: 07971 322 482

Email: sarah.stalker@rbkc.gov.uk

Reason to call: If you suspect a child is being criminally or sexually exploited (e.g., gangs, trafficking, online grooming) this lead is the specialist contact to assess risk and initiate an exploitation pathway.

Local Authority Designated Officer (LADO) – Allegations against Staff/Volunteers

Duty LADO – Children's Services

Telephone: 020 7361 2120

Email: LADO@rbkc.gov.uk

Reason to call: If an allegation is made against a staff member or volunteer of your organisation (or a partner organisation) involving a child, this is the correct contact for consultation and potential safeguarding investigation under statutory guidance.

Prevent / Radicalisation – Safeguarding Extremism

Prevent Team (LBHF / RBKC)

Telephone: 020 8753 5727

Email: prevent.rbkc@rbkc.gov.uk

Reason to call: If you have concerns that a child may be being drawn into extremism or radicalised, this team provide specialist referral and support under the Prevent strategy.

Education & Attendance – School/Education Setting Safeguarding

Wendy Anthony (Bi-borough Head of Admissions & Access to Education)

Telephone: 020 7745 6440

Email: wendy.anthony@rbkc.gov.uk

Reason to call: If your safeguarding concern is tied to school attendance, access to education or missing school safeguarding risk (e.g., persistent absence, exclusion), this is the relevant education safeguarding lead.

Named Safeguarding Professionals – Health & NHS Services

Emelia Bulley (ICB Designated Nurse for Safeguarding Children)

Mobile: 07867 185 726

Email: emelia.bulley@nhs.net

Dr Neera Dholakia (ICB Named GP for Safeguarding Children)

Mobile: 07917 001 950

Email: neera.dholakia@nhs.net

Reason to call: When a safeguarding concern involves a child's health or medical setting (e.g., injuries, neglect with medical implications, health-service liaison), these named professionals provide statutory advocacy and advice within the NHS.

Multi-Agency Safeguarding Hub (MASH) – Referral Gateway

Telephone: 020 7361 3013

Email: socialservices@rbkc.gov.uk Royal Borough of Kensington and Chelsea

Reason to call: This is the primary gateway for reporting concerns about children in need or at risk of significant harm. If you're unsure how serious the case is, you call here first and they'll decide on the next steps.

School Safeguarding Lead (Education Settings Specialist)

Elaine Campbell (Bi-borough Safeguarding Lead for Schools & Education)

Telephone: 020 7361 3000

Mobile: 07712 236 508

Email: elaine.campbell@rbkc.gov.uk

Reason to call: If you work within or with schools, and need specialist safeguarding advice or training, this is the specialist for educational environments and settings.

Other National contacts

NSPCC Advice Line (24/7):

0808 800 5000

Whistleblowing

If you are concerned about how child protection issues are being handled in your own or another organisation that may be putting children at risk please contact:

NSPCC Whistleblowing Advice Line

0800 028 0285 / help@nspcc.org.uk

Useful Links: Further Advice & Guidance

[PREVENT Duty Guidance](#)

For concerns relating to radicalisation and extremism.

[NSPCC](#)

A registered charity established to prevent cruelty to children with many useful resources and guidance. They operate a 24 Hour Helpline for advice and support: 0808 800 5000.

[Child exploitation and Online Protection \(CEOP\)](#)

CEOP are part of the police who investigate and deal with cases of online grooming. Their Child Protection Advisors are fully trained to offer support and guidance to any young people who are worried about online grooming. You can make a report or request advice and guidance relating to online safeguarding.

[Safeguarding children and young people](#)

For details of legislation and up to date information on Child Protection

Legislation Informing Nova's Child Safeguarding Policy

This policy is informed by the following legal and statutory frameworks:

Working Together to Safeguard Children (2023): Statutory multi-agency guidance outlining safeguarding roles, responsibilities and procedures for protecting children. [Open document](#)

Children Act (2004): Establishes the duty to safeguard and promote the welfare of children, forming the legal foundation for safeguarding practice. [Open document](#)

Equality Act (2010): Ensures children are protected from discrimination; informs equality duties relevant to safeguarding and inclusion. [Open document](#)

Promoting the Health and Well-being of Looked After Children – Statutory Guidance (DfE & DH, 2015): Sets out joint duties of local authorities and health services for children in care; recognises specific safeguarding needs. [Open document](#)

Sexual Offences Act (2003): Defines offences including child sexual exploitation, grooming and abuse of trust; informs staff conduct and response. [Open document](#)

Female Genital Mutilation Act (2003): Criminalises FGM; includes mandatory reporting duties for safeguarding professionals. [Open document](#)

Keeping Children Safe in Education (2024): Statutory guidance setting out safeguarding responsibilities; while aimed at schools, relevant to all children's organisations. [Open document](#)

6. Appendices

- A. Changing Children Guidance
- B. Physical Restraint and Intervention Guidance
- C. Types of Abuse
- D. Prevent Duty & Recognising the Signs of Radicalisation and Extremism
- E. Risk Assessment Tools & Procedures for trips and activities

Appendix A

NOVA NEW OPPORTUNITIES Changing Children Guidance

Procedures for dealing with children who have wet themselves (where parents are unavailable)

1. Find replacement clothes.
2. Take child to the toilet and ask them to try to go to the toilet.
3. Ask child to change self in toilet. Give child plastic bag to put wet clothes in and wet wipes to clean themselves.
4. If there are no replacement clothes ring parents and ask to bring clothes immediately.
5. If child is too young to change in toilets by self, **two adults must be present** while one adult helps child get changed.
6. If a staff member is on their own, ask a sensible child to get member of staff to come out for an urgent situation.
7. Staff should use disposable gloves if handling soiled or wet clothes.
8. Ensure parent/carers are informed when they collect their child.

Do Not:

- Ask children to help other children to get changed
- Touch the children's genitals
- Blame or embarrass the child for wetting themselves

Appendix B

NOVA NEW OPPORTUNITIES

Physical Restraint and Intervention Guidance

- The Charity recognises that there may be times when physical contact with a child or young person (CYP) may be necessary, for example; giving first aid, if a child is in distress or needs comfort or calming down.
- It is also recognised that there are some children for whom touching is unwelcome, because of their cultural background or personal history.
- The Charity aims to develop clear common practice with all CYP accessing activities and events, where restraint or holding may be necessary.
- This guidance should be made available to all staff, volunteers; as well as where necessary for parents or carers, who are authorised to help during activities and events.

This guidance is written with reference to Section 9.3 of the Education and Inspections Act 2006 and any subsequent additions. Management should also follow any updates and training provided by RBKC.

Definitions

Physical intervention should be very rarely used by Charity staff and most incidents of challenging behaviour should be managed by talking to the children, calming them down and diffusing the situation.

However, on exceptional occasions it may be necessary for adult physical intervention for the following reasons:

- When there is immediate danger of personal injury to the child
- When there is immediate danger of injury to another person
- To avoid damage to property
- When a child is behaving in a way to cause serious disruption to other children

In exceptional circumstances, where there is immediate risk of injury, a member of staff may need to take any necessary action that is consistent with the concept of 'reasonable force'.

It is important to remain outwardly calm and quiet, considering the safety of children, staff and self.

The Charity aim is to only use physical intervention if all other strategies, e.g. diversion, reasoning, warning, have been ineffective. The purpose is to limit the child's ability to hurt themselves or others with the minimum of force through limitation of movement. It should not cause pain, panic or fear. Try to talk with the child explaining what you are doing and why.

Staff will ensure that considerations are made with regard to:

- Withdrawing other children or adults from the situation
- Distracting and re-directing the child's attention
- Making the environment as safe as possible to avoid a child causing injury to themselves, other children or a member of staff

Acceptable Forms of Physical Restraint and Intervention

- Leading or guiding a child by the hand or arm, or shepherding them with a hand in the centre of the back
- Holding a child who has lost control until they are calm and safe
- Physically moving between and separating two children
- Blocking a child's pathway
- Using reasonable force to remove a tool, that may be used in a dangerous manner, from a child's grasp
- Where there is immediate risk of injury, any necessary action that is consistent with the concept of 'reasonable force' – i.e. to prevent a child running out of a safe activity or environment, running into a busy road or hitting or hurting someone

Charity staff may move, defend themselves, lead, restrain or block someone, ensuring that they are bearing in mind the whole time their own safety as well as that of others and of the child who is the subject of any physical restraint or other intervention.

Unacceptable Forms of Physical Restraint and Intervention

Following are unacceptable forms of physical restraint and interventions and are potential grounds for disciplinary action for staff.

- Any form of corporal punishment, slapping, punching or kicking
- Holding by the neck or collar, or otherwise restricting the ability to breathe
- Holding by the hair or an ear
- Twisting or forcing limbs against a joint
- Tripping up a pupil or holding an arm out at neck or head height to stop them
- Holding a child face down on the ground or sitting on them
- Shutting or locking a child in a room, except in extreme situations whilst summoning support
- Charity staff MUST also avoid touching or holding a child in a way that might be considered indecent.

Reporting an Incident of Physical Restraint and Intervention

An electronic record of any incident where restraint was used will be kept on the Survey Gizmo database. A full written account of the incident should be made by the member of staff concerned and will include:

- The child's name and date of birth
- Date and time of the incident
- Details of the incident including the reason why force was needed, how the incident began and progressed, who said what, what was done to calm things down
- Who managed the incident
- Method including what degree of force was used; what kind of hold, where and for how long, method of restraint if used
- Details of witnesses and/or other staff involved
- Witness statements
- Debriefing details / evaluation
- Parent / carer informed and response

The incident forms are monitored on a weekly basis.

Appendix C

Types of Abuse

All staff should be aware of the following six categories of abuse (*with links from the NSPCC and ChildLine for further reading*):

1. Physical abuse:

This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or physical harm to a child. It may also be caused when a parent fabricates the symptoms of, or deliberately induces illness in a child. Female Genital Mutilation (FGM) is a form of physical abuse.

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/physical-abuse/legislation-policy-guidance/>
<https://www.childline.org.uk/info-advice/bullying-abuse-safety/abuse-safety/physical-abuse>

2. Female Genital Mutilation (FGM):

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003. It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Section 5B of the 2003 Act¹ introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/469448/FGM-Mandatory-Reporting-procedural-info-FINAL.pdf

3. Emotional abuse:

Is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another
- Serious bullying, causing children frequently to feel frightened or in danger
- Exploitation and corrupting children

Some level of emotional abuse is involved in all types of maltreatment of a child though it may occur alone. <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/emotional-abuse/what-is-emotional-abuse/>

4. Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

Useful links: <https://www.rbkc.gov.uk/sharedservices/lscb/professionals/childsexualexploitation.aspx> <https://www.met.police.uk/globalassets/downloads/child-abuse/the-london-sexual-exploitation-operating-protocol-3rd-edition-june-2017.pdf>

Useful tool for discussions with children: <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/underwear-rule/>

5. Neglect:

Neglect is 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 and development. It may involve a parent 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 care-givers)
- ensure access to appropriate medical care or treatment
- neglect may occur in pregnancy as a result of maternal substance misuse.

Factors such as those described in physical, emotional, sexual abuse and neglect that are found in cases of child abuse or neglect are not proof that abuse has occurred, but must be regarded as indicators of the possibility of significant harm.

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/neglect/>

6. Sexual abuse:

Includes exploiting a child by force or enticing them to take part in sexual activities whether or not the child is aware of what is really happening. The activities may involve physical contact including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. It includes abuse of children through sexual exploitation and non-contact activities such as involving children in looking at or in the production of pornographic materials. Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

If, during the delivery of services, it becomes apparent that a child is sexually active, **staff must be alert** to the possibility of the child being in an abusive relationship and act appropriately to safeguard the child/young person.

Key Messages for staff:

- The welfare of the child is paramount
- Early help to prevent problems escalating
- Treat families with consideration, respect and in a non-judgmental way
- Work professionally with other agencies
- Make referrals and provide information to Children's Social Care and provide services as part of and agreed action plan
- Keep records that are clear, concise and contemporaneous ensuring they are dated and signed.
- If in doubt ask your DSL for guidance.

Referrals and Reporting

All staff are expected to take appropriate action if they suspect that a child/young person is suffering from significant harm or likely to suffer significant harm, by making a referral (initially by phone then in writing) to the appropriate local authority CSC. The RBKC referral form is available via the link below. In recording the outcome of an assessment, staff should make a **clear distinction between fact, observation, allegation and opinion**.

If applicable, report allegations and incidents of abuse to the appropriate LADO (Local Area Designated Officer). For further guidance, refer to the flow chart in [Section 4.5.5](#) and refer to [Section 5.1 Contacts for Safeguarding: Kensington and Chelsea](#) for the contact details within Local Authorities and other external agencies.

Where to refer if the child attends the Charity from outside the borough of RBKC

Referrals must be made to the appropriate local authority CSC. This is determined by the most recent address of where the child is living and where the concern is identified.

For cases with queries or possible child sexual abuse, the **Designated Safeguarding Lead (DSL)** must be alerted immediately for management of these cases. The child should be reviewed in the most appropriate setting. For alleged child sexual abuse that may require forensic evidence, these cases must be referred directly to:

- The Havens (London) <https://www.thehavens.org.uk/> or
- National rape crisis centres: <https://rapecrisis.org.uk/centres.php>

The ultimate aim of safeguarding children is to ensure positive outcomes for the child/children. The child's local LSCB's Threshold of Needs frameworks provide the context within which staff undertake their assessments. This then determines the level of support that will be required from a single or multi-agency perspective.

Details of the Charity's partner LSCB, is the Royal Borough of Kensington & Chelsea's (RBKC) Children's Social Care (CSC) thresholds for referrals can be found above in *Section 5.1 Contacts for Safeguarding: Kensington and Chelsea.*

Appendix D

Recognising the Signs of Radicalisation & Extremism

Radicalisation and extremism can put a child or young person at risk of being drawn into violence and criminal activity and has the potential to cause significant harm.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. Extremists might target them and tell them they can be part of something special, later brainwashing them into cutting themselves off from their friends and family. Children and young people may become radicalised if they feel:

- Isolated and lonely or wanting to belong
- Unhappy about themselves and what others might think of them;
- Embarrassed or judged about their culture, gender, religion or race;
- Stressed or depressed;
- Fed up of being bullied or treated badly by other people or by society;
- Angry at other people or the government;
- Confused about what they are doing;
- Pressured to stand up for other people who are being oppressed.
- The desire to be valued and respected
- There are few other options open to them
- No one is listening to them/have no voice

Signs that may indicate a child is being radicalised include:

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- Unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use.

However, these signs don't necessarily mean a child is being radicalised – it may be normal teenage behaviour or a sign that something else is wrong.

The Prevent Duty

From 1 July 2015 all organisations working with children and young people are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to the statutory guidance. Paragraphs 57-76 of the guidance are concerned specifically with organisations working with children and young people: <https://www.gov.uk/government/publications/prevent-duty-guidance>

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V.1.3	Review and Update	January 2022	Addition of CPOMs and uncollected child/late policy	Emma Butt	Lizzie Cho - Director
V.1.3	Review	May 2022	Review and no changes required.	Emma Butt, Matthew Barnett	Lizzie Cho - Director
V.1.4	Minor Update	September 2022	Updated Local Authority Contacts in appendices, change of DSL from Emma Butt to Matthew Barnett (staff changes)	Matthew Barnett	Lizzie Cho - Director

v.1.5	Minor Update	April 2023	Amended full review interval to 1 year and corrected upcoming date of next full review to May 2023	Matthew Barnett	Lizzie Cho - Director
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