



Safeguarding Children and Adults at Risk Policy & Procedures

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Designated Safeguarding Lead:	Matthew Barnett
Deputy Safeguarding Lead:	Katya Elina

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Abbreviations used in this document	Meaning
CAMHS	Child and Adolescent Mental Health Services
CPOMS	Child Protection Online Management System
CSC	Children's Social Care
CYP	Children and Young People
DH	Department of Health
DSL	Designated Safeguarding Lead for the Charity
LAC	Looked After Child
LADO	Local Authority Designated Officer
LSCP	Local Safeguarding Children Partnership
MASH	Multi Agency Safeguarding Hub
RBKC	Royal Borough of Kensington and Chelsea
SGC	Safeguarding Children

Terminology

For the purposes of this policy, the terms “Nova” and “the Charity” are used interchangeably and should be understood to refer to **Nova New Opportunities**, the organisation to which this policy applies.

Nova New Opportunities Safeguarding Contacts

Nova New Opportunities Director:

Lizzie Cho

Tel: 07780463336

Email: lizzie.cho@novanew.org.uk

Designated Safeguarding Lead (DSL):

Matthew Barnett

Tel: 078450422359

Email: matthew.barnett@novanew.org.uk

Deputy Designated Safeguarding Lead (DDSL):

Katya Elina

Tel: 07515101170

Email: Katya.Elina@novanew.org.uk

1. Policy Statement

All **children and young people** have the right to protection from all forms of abuse, neglect and exploitation, and to participate in activities within a **safe, inclusive and supportive environment**. Nova New Opportunities is also committed to safeguarding **adults at risk**, recognising our statutory responsibilities under the Care Act 2014.

We are committed, so far as is reasonably practicable, to providing environments that are safe from harm for all **children under the age of 18, young people up to the age of 25 with Special Educational Needs and/or Disabilities (SEND)**, and **adults at risk**, across all locations and settings used by the Charity, including online and off-site provision.

Nova New Opportunities gives equal priority to safeguarding all individuals, regardless of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, or any other protected characteristic under the Equality Act 2010. We recognise that safeguarding risks may be heightened by inequality, discrimination or barriers to accessing support.

We aim to achieve this by:

- Ensuring our safeguarding policies and procedures are compliant with **current local and national legislation, statutory guidance and best practice** relating to both children, young people and adults at risk.
- Maintaining effective systems and procedures that ensure our facilities, activities and delivery models take full account of safeguarding, health, safety and welfare requirements.
- Following robust **safer recruitment practices** for all staff and volunteers, including appropriate vetting, to ensure their suitability to work with children, young people and adults at risk.
- Requiring relevant staff to complete **appropriate safeguarding training** commensurate with their role, including Level 3 safeguarding training where required, and ensuring this is refreshed in line with statutory guidance and local safeguarding partnership expectations.
- Providing effective leadership, management and supervision to staff and volunteers, alongside ongoing safeguarding training and support.
- Ensuring that children, young people and adults at risk are informed of, and have access to, **clear and trusted safeguarding contacts** within the organisation.
- Taking account of the individual needs, backgrounds and circumstances of all participants, and responding in ways that promote dignity, inclusion and wellbeing.
- Making clear to all participants and staff what constitutes **unacceptable behaviour**, including aggressive, discriminatory or racist behaviour, and that such behaviour will not be tolerated.

- Ensuring that all staff and volunteers understand safeguarding principles relevant to their role, and that this **Safeguarding Children and Adults at Risk Policy & Procedures** is provided during induction and made accessible via the Charity's website.

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

2. Supporting Policies and Procedures

2.1 Publicly available policies

- **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**

3. Scope, Definitions and Legal Framework

The purpose of this document is to set out Nova New Opportunities' safeguarding policy and procedures for the protection of **children, young people and adults at risk** who engage with, or are affected by, the Charity's activities.

For the purposes of this policy, a **child** is defined as any person who has not yet reached their 18th birthday, in line with the Children Acts 1989 and 2004. Nova also works with **young people aged up to 25 with Special Educational Needs and/or Disabilities (SEND)**. In accordance with the SEND Code of Practice (2015), Nova recognises that some young people with SEND may experience extended dependency, increased vulnerability and additional safeguarding risks during transition to adulthood. References to "children" within this policy should therefore be read as including **young people up to the age of 18 (25 with SEND)**.

Nova further recognises its responsibility to safeguard **adults at risk**. Under the Care Act 2014, an adult at risk is a person aged 18 or over who:

- has needs for care and support (whether or not the local authority is meeting those needs), and
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those care and support needs, is unable to protect themselves from the abuse or neglect or the risk of it.

While safeguarding children and safeguarding adults are governed by **distinct legal frameworks**, Nova adopts a **whole-organisation safeguarding approach**. The core principles of safeguarding — prevention, proportionality, protection, partnership and accountability — apply across all age groups. Where policy or procedural requirements differ for children and adults at risk, this is made explicit within the relevant sections of this document.

Nova New Opportunities is a voluntary sector organisation. This policy applies to, and must be read and followed by, all **Trustees, staff, volunteers, ambassadors, contractors and partners** who work with or on behalf of the Charity, or who may come into contact with children, young people or adults at risk through Nova's work.

The policy relates to all individuals accessing Nova's activities, regardless of age, gender, disability, ethnicity, nationality, religion, sexual orientation or socio-economic background. Nova is committed to equality, inclusion and anti-discriminatory practice and recognises that safeguarding risks may be heightened by structural inequality, discrimination or barriers to accessing support.

Nova delivers a range of **online, after-school, weekend, school holiday and residential activities** for children, young people, adults and families. Activities may take place on Nova premises, in community venues, in partner settings or online. For the purposes of this policy:

- **Staff** refers to paid employees of Nova New Opportunities.
- **Volunteers** refers to all unpaid individuals supporting the Charity, including (but not limited to) mentors, sessional helpers and ambassadors. Children and young people participating in Nova programmes do not become volunteers solely because they undertake supported leadership, peer mentoring or assisting activities as part of their participation. In these circumstances, they remain programme participants and are subject to the safeguarding arrangements applicable to children and young people.

For children and young people, **safeguarding and promoting welfare** is defined, in line with *Working Together to Safeguard Children* (December 2023), 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; and
- taking action to enable all children to have the best outcomes.

Safeguarding is **everyone's responsibility**. All adults who come into contact with children, young people or adults at risk through their work with Nova have a **duty of care** to safeguard and promote their wellbeing.

For children, **child protection** refers to the specific actions taken to protect individual children who are suffering, or are likely to suffer, significant harm. For adults at risk, safeguarding includes preventing and responding to abuse or neglect through proportionate, person-centred and legally compliant action.

The Children Act 2004 places a duty on organisations to safeguard and promote the welfare of children and young people. The Care Act 2014 places corresponding duties in relation to adults at risk. Nova is committed to ensuring that all those who work with or on behalf of the Charity are **suitably recruited, trained, supported and supervised** to carry out their safeguarding responsibilities safely and effectively.

This policy should be read alongside relevant statutory guidance, including *Working Together to Safeguard Children* (December 2023), the SEND Code of Practice (2015), and Care Act 2014 statutory guidance.

4. Roles and Responsibilities

The implementation of this policy is mandatory across all areas of the Charity. Any behaviour by a Trustee, member of staff, apprentice, 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:

4.1 Director and Senior 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 children and adults at risk 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.

4.2 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 and that procedures to support the policy are set up as outlined, complied with and communicated.
- ensuring the referral of all safeguarding and 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 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.

4.3 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.

4.4 Safeguarding Training and Ongoing Development

Nova New Opportunities is committed to ensuring that all Trustees, staff, volunteers, freelancers and consultants receive safeguarding training that is **appropriate to their role**, proportionate to their level of responsibility, and kept up to date. The Charity will ensure that:

- all staff and volunteers receive safeguarding induction prior to **undertaking work involving children, young people and/or adults at risk**, including how to recognise safeguarding concerns, how to respond appropriately, and how to report and record concerns in line with this policy;
- safeguarding training is **refreshed regularly**, and additional briefings or updates are provided where procedures, legislation or risks change;
- staff working directly with children, young people and/or adults at risk receive **role-appropriate safeguarding training** relevant to the nature of their work;
- Designated Safeguarding Leads and deputies undertake **enhanced safeguarding training** and maintain up-to-date knowledge of local safeguarding arrangements, statutory guidance and multi-agency procedures;
- safeguarding learning is supported through **supervision, management oversight and access to advice**, enabling staff to raise concerns, reflect on practice and seek guidance when needed.

Safeguarding training and development form part of the Charity's wider commitment to maintaining a safe, vigilant and learning-focused organisational culture.

5. Safer Recruitment and Vetting

Nova New Opportunities is committed to safer recruitment practices that prevent unsuitable individuals from working with children, young people and adults at risk. Safer recruitment is a core safeguarding responsibility and forms part of the Charity's statutory duties under the Children Act 2004 and the Care Act 2014.

DBS checks are **one part** of a wider safer recruitment framework and are **never relied upon in isolation**.

5.1 Safer Recruitment

All staff involved in the recruitment or selection of staff or volunteers must:

- **Complete Safer Recruitment training** appropriate to their role, in line with Local Safeguarding Children Partnership (LSCP) expectations; and
- **Understand their safeguarding responsibilities within recruitment**, including how to identify concerns, manage safeguarding-related information appropriately, and **follow the Local Authority Designated Officer (LADO) process** where concerns or allegations relate to a person working with children.
- Ensure that safeguarding induction requirements link to the Charity's wider safeguarding training and ongoing development arrangements, as set out in **Section 4.4** of this policy.

No individual will commence in post until **all required pre-employment checks** have been completed and assessed as satisfactory, unless a risk-assessed exception has been formally authorised and recorded.

Safer recruitment practices apply equally to roles involving contact with **children** and **adults at risk**, with checks proportionate to the nature of the role and the level of contact involved.

5.2 Induction

All new staff and volunteers will receive a safeguarding-focused induction which:

- identifies the Charity's safeguarding policies and procedures, including this Safeguarding Children and Adults at Risk Policy & Procedures;
- sets out expected standards of conduct, professional boundaries and reporting responsibilities; and
- ensures individuals know how to access safeguarding advice and raise concerns.

All staff and volunteers will be signposted to where policies are stored and are required to familiarise themselves with safeguarding procedures relevant to their role.

5.3 Job Descriptions and Person Specifications

All roles, including volunteer roles, are subject to a formal application process.

Job descriptions and person specifications:

- clearly set out the duties and responsibilities of the role;
- identify safeguarding responsibilities where relevant; and
- inform recruitment, selection and appointment decisions.

Person specifications detail the skills, experience, abilities and attributes required, including suitability to work with children and/or adults at risk where applicable.

5.4 References and Interviews

Two satisfactory references must be obtained for all shortlisted applicants. These will:

- be sought directly from referees;
- include a specific question regarding the applicant's suitability to work with children and/or adults at risk; and
- be scrutinised for inconsistencies or concerns, which will be followed up.

Open references, testimonials, or references from friends or relatives are not accepted.

All roles require a face-to-face (or live virtual) interview. Interviews explore:

- the applicant's ability to meet the job requirements;
- their understanding of safeguarding responsibilities; and
- any relevant history of disciplinary action, allegations, cautions or convictions, which will be considered on a case-by-case basis.

5.5 Offer of Appointment and Pre-Employment Checks

All offers of employment or engagement are conditional upon receipt of satisfactory:

- DBS clearance at the appropriate level;
- references;
- proof of identity and right to work; and
- original qualification certificates where relevant.

A recruitment checklist is used to track, verify and audit all pre-employment checks in line with safeguarding best practice.

5.6 The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to roles involving work with, or access to, children or adults at risk. Applicants must therefore declare **all convictions, cautions and relevant information**, including those that would normally be considered “spent”. This information is handled fairly, confidentially and in accordance with safeguarding and data protection requirements.

5.7 DBS (Disclosure and Barring Service) Checks

Nova New Opportunities ensures that all staff and volunteers are vetted in accordance with DBS legislation and statutory safeguarding guidance.

As part of safer recruitment:

- **all staff and volunteers** are required to hold, as a minimum, a **Basic DBS check**, unless the role meets the criteria for a higher level of check;
- **Enhanced DBS checks** are required where roles involve **regulated activity** with children, adults at risk, or both; and
- where legally required, checks will include the **Children’s Barred List and/or Adults’ Barred List**.

The level of DBS check required is determined by the nature of the role and regulated activity, in line with:

- the Safeguarding Vulnerable Groups Act 2006 (as amended); and
- DBS eligibility guidance.

Regulated Activity

For children, regulated activity is determined by the nature and frequency of the activity in accordance with the Safeguarding Vulnerable Groups Act 2006 (as amended) and current DBS eligibility guidance.

From 1 September 2026, the supervision exemption from regulated activity with children was removed. Teaching, training, instructing, caring for or supervising children may therefore constitute regulated activity even where the individual carrying out the activity is supervised. Where the relevant period condition applies, this includes activity carried out on more than three days in any 30-day period, or relevant overnight activity.

Supervision remains an important safeguarding measure but does not determine whether otherwise qualifying activity constitutes regulated activity. Nova will assess roles according to the nature and frequency of the activity and apply appropriate safer recruitment and DBS arrangements.

Regulated activity relating to adults at risk is determined separately in accordance with the Safeguarding Vulnerable Groups Act 2006 (as amended) and current DBS eligibility guidance, including relevant healthcare and personal care activities.

All staff and volunteers undertaking regulated activity must hold a **valid Enhanced DBS certificate** at the correct workforce level. Pre-existing DBS certificates will only be accepted where they:

- are registered with the DBS Update Service;
- are current;
- are at the correct level and workforce; and
- are appropriate for the role.

Where individuals are not registered with the Update Service, a new DBS check will be undertaken. Volunteers will be supported to register for the Update Service, which is free of charge.

Exceptional Transferability

In exceptional and time-limited circumstances only, and with Senior Management Team approval, transferability of a DBS certificate may be accepted where:

- the certificate was issued within the previous three months;
- the original certificate has been verified; and
- it matches the required level, workforce and role.

No individual will commence regulated activity until the applicable safer recruitment and vetting requirements have been considered and any required DBS clearance confirmed, except where an exceptional arrangement has been formally authorised, risk assessed and recorded in accordance with Nova's procedures.

5.8 Dealing with Convictions

All applicants are required to sign a declaration of suitability to work with children and/or adults at risk. Where a DBS disclosure contains relevant information, a formal risk assessment will be undertaken, considering:

- the nature and seriousness of the offence;
- its relevance to the role;
- the time elapsed; and
- any pattern of concerning behaviour.

Decisions are made on a **case-by-case basis**, with safeguarding as the paramount consideration.

5.9 Overseas Checks

Where applicants have lived or worked outside the UK, additional safeguarding checks will be required. This may include a:

- Certificate of Good Conduct; or
- Police Certificate from the relevant country or countries.

These checks are considered alongside DBS information as part of the overall suitability assessment.

5.10 Record Retention and Data Protection

Recruitment records, including interview notes, are retained for **six months** following completion of the recruitment process and then securely destroyed.

This retention period complies with the Data Protection Act 2018 and UK GDPR and allows the Charity to respond to:

- data subject access requests;
- recruitment complaints; or
- employment tribunal proceedings.

All personal data is stored securely and access is restricted to authorised personnel only.

6. Other People involved with Nova New Opportunities including Visitors

Nova New Opportunities recognises that, in addition to employed staff, a range of other individuals may be involved in, or present during, the Charity's activities. This includes volunteers, mentors, helpers, contractors, partners, visitors, parents/carers and members of the public.

All such involvement must be managed in a way that safeguards children, young people and adults at risk, and maintains clear professional boundaries and accountability.

6.1 Volunteers, Mentors and Helpers

Whether a volunteer role constitutes regulated activity will be determined by the nature and frequency of the activity, in accordance with current legislation and DBS eligibility guidance. The presence or supervision of staff and/or parents/carers does not, in itself, mean that otherwise qualifying activity is not regulated activity. Where a role does not constitute regulated activity, proportionate safeguarding arrangements will still apply, including appropriate vetting, induction, supervision and clear role boundaries.

All volunteers are required to:

- receive safeguarding information appropriate to their role;
- follow Nova's Code of Conduct; and
- report safeguarding concerns in line with this policy.

6.1.1: Young Participants Undertaking Supported Leadership:

Children and young people participating in Nova programmes may undertake supported leadership, mentoring or peer-support activities as part of their development and participation. A young person does not become a volunteer solely because they undertake such activities as part of a Nova programme. Appropriate adult staff retain responsibility for delivery, supervision and safeguarding. Young participants will not be counted towards adult staffing ratios, used as substitutes for staff or adult volunteers, or given independent responsibility for the supervision or safeguarding of other children. Where a young person's involvement develops into a substantive volunteer or worker role, Nova will review the role and any applicable safer recruitment and DBS requirements before that role begins.

6.2 Visitors, Contractors and External Parties

Visitors may include interviewees, parents/carers, contractors, partner staff or other authorised individuals attending Nova premises or activities.

All visitors must:

- sign in on arrival and sign out when leaving;
- wear a visible visitor identification badge or lanyard, clearly distinguishable from staff identification; and
- be informed of basic safeguarding expectations while on site.

Visitors must be **accompanied at all times** by a member of Nova staff and must **never be left alone** with children or adults at risk.

Where external professionals or partner organisations are involved in delivery, Nova will take reasonable steps to assure itself that appropriate safeguarding arrangements are in place, including DBS checks where required. However, safeguarding responsibility for children or adults at risk remains with Nova when activities are delivered under its oversight.

6.3 Parents, Carers and Family Members

Parents and carers are welcome and encouraged to attend family activities and mixed-age group sessions. During these activities, parents and carers remain responsible for the supervision and safety of their own children at all times.

While parents and carers retain responsibility for their own children, Nova maintains overall responsibility for the safe delivery of the activity, including safeguarding arrangements, risk assessments, and staff oversight.

Where required, parental/carer consent forms will outline the nature of the activity, the level of supervision provided by Nova, and any specific arrangements (including transport, off-site activities or

physical contact where applicable). These forms help ensure a shared understanding of responsibilities between Nova and parents/carers.

Parents/carers:

- must follow staff direction and agreed boundaries while on site or during activities;
- must remain responsible for and supervise their own children at all times unless alternative arrangements have been formally agreed in advance;
- should not take responsibility for supervising other children or adults at risk unless this has been formally agreed and appropriately risk assessed by Nova staff; and
- must raise any safeguarding concerns with Nova staff immediately.

Parents and carers will be reminded of these expectations, along with any activity-specific guidance, prior to and at the start of family activities.

Scope of Responsibility and Trip/Visit Arrangements

Nova works with children, young people and families across a range of delivery models. In all cases, parents/carers retain primary responsibility for the safety, wellbeing and supervision of their children, except where children and young people are attending Nova-led activities without a parent/carer present.

For family-based activities, trips and visits, parents/carers remain responsible for the direct supervision of their children at all times. Nova staff are responsible for the safe delivery of the activity, including appropriate safeguarding arrangements, planning and oversight.

For activities, trips or visits where children and young people attend without a parent/carer present, Nova assumes responsibility for their supervision and safety for the duration of the activity, in line with this policy.

Where Nova signposts or refers families to external providers, Nova's responsibility is limited to appropriate due diligence and information sharing. Responsibility for supervision and safeguarding during these activities remains with the parent/carer and/or the external provider.

For trips and visits where children and young people attend without a parent/carer present, informed parental/carer consent is obtained in advance. For family trips and visits, expectations around parental/carer supervision and responsibility are clearly communicated and reinforced in advance and during delivery. These arrangements must be reflected in activity planning and risk assessments.

6.4 Safeguarding Adults at Risk – Additional Considerations

When working with adults at risk, visitors, volunteers and external parties may have more direct interaction than would be appropriate with children. In these circumstances:

- consent should be obtained from the adult at risk where appropriate;
- interactions must remain proportionate, respectful and role-appropriate; and
- staff must be alert to risks of coercion, undue influence or exploitation.

Any concerns relating to the behaviour or conduct of volunteers, visitors or external parties towards adults at risk must be reported immediately to the Designated Safeguarding Lead and managed in line with adult safeguarding procedures.

7. Working with Children and Young People

Nova requires all those working directly with children and young people 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.

Unless otherwise stated, the general principles of safe working practice set out below apply to all activities delivered by Nova involving children and young people.

7.1 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 care and safety as the 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 and facility safety issues, including fire procedures, the location of emergency exits, emergency telephones and first aid equipment.

7.2 Supervision and staffing ratios

Where children are attending activities without a parent/carer present, the following recommended staff supervision ratios apply:

- under 2 years: 1:3
- 2–3 years: 1:4
- 4–8 years: 1:6
- 9–12 years: 1:8
- 13–18 years: 1:10

It is recommended that, even where 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. Nova does not deliver early years provision and is not resourced to provide care for children under 3 outside of parent/carer supervision. Children and young people undertaking supported leadership, mentoring or peer-support activities as programme participants will not be counted towards required adult staffing ratios. These ratios reflect NSPCC/sector best practice guidance and are included for reference only.

7.3 Working alone and professional boundaries

Wherever possible, staff should avoid being alone with children.

Where 1:1 situations may be unavoidable (for example during travel, mentoring, or while awaiting collection), staff must ensure this is risk assessed, takes place in an open or public setting where possible, and is communicated to a colleague or the Designated Safeguarding Lead (DSL).

Staff should not offer to transport a child or young person in a private vehicle unless written parent/carer consent has been obtained and this has been agreed in advance in line with Nova procedures.

If a member of staff finds themselves unexpectedly alone with a child (for example due to late collection), they must inform a colleague or the DSL immediately, remain in an open/public area where possible, and record the incident in line with safeguarding procedures.

Staff are expected to maintain clear professional boundaries at all times and to behave and dress in a manner that promotes recognised good practice in relation to safeguarding.

7.4 Physical contact with children and young people

Nova New Opportunities advises against physical contact with children. However, it is recognised that there may be limited circumstances where physical contact is unavoidable or necessary, for example:

- to prevent immediate harm or danger;
- to provide appropriate first aid;
- to support participation in an activity where this is agreed, proportionate and appropriate to the setting.

Any physical contact must be:

- necessary, proportionate and in the best interests of the child or young person;
- appropriate to the staff member's professional role;
- respectful of the child's dignity, boundaries and wishes; and
- carried out in a way that minimises the risk of misinterpretation.

Staff must not initiate physical contact that could reasonably be viewed as intrusive, inappropriate or excessive. Where physical contact is required as part of an activity, this should be planned, risk-assessed and transparent, and parents/carers should be informed in advance where appropriate.

Staff must act in accordance with the Children Act 1989, the Equality Act 2010, and relevant safeguarding guidance. Failure to adhere to this guidance may result in disciplinary action and, where appropriate, referral to external authorities.

7.5 Consent, information and confidentiality

Parental consent and relevant medical information must be obtained in advance when Nova is working directly with, and has responsibility for, a child or young person. Consent forms are required for some children's activities and define the scope of Nova's responsibility and clarify the ongoing responsibilities of parents/carers.

Staff accompanying children must have access to completed Information and Parental Consent Forms for all participants. This information must be treated as confidential and handled in accordance with Data Protection legislation.

7.6 Named safeguarding contact

Children and their parents/carers should be given a named safeguarding contact to whom they may report any worries or concerns. Contact names and telephone numbers should be clearly communicated and visibly displayed at events.

7.7 Programme delivery and conduct

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 to demonstrate respect and tolerance for all people, with particular regard to the protected characteristics set out in the Equality Act 2010.

7.8 Recording and reporting concerns

All accidents, incidents or concerns involving staff or participants must be recorded using the Charity's CPOMS immediately, or as soon as is reasonably practicable.

All staff are responsible for reporting suspected cases of child abuse in accordance with the procedures set out in **Section 14** of this policy.

8. Working with Adults at Risk

Nova recognises its statutory responsibility to safeguard adults at risk, as defined by the Care Act 2014. While safeguarding adults and safeguarding children operate within different legal frameworks, Nova applies a consistent, organisation-wide safeguarding approach.

Unless otherwise stated below, the general principles and safe working practices set out in **Section 7** apply equally when working with adults at risk. This section highlights where practice differs or must be applied differently.

8.1 General guidance for safe working practice

Staff working with adults at risk should:

- be appropriately trained and competent to deliver services safely and effectively;
- plan activities and sessions with care and safety as the primary concern, informed by individual needs and risk assessments;
- follow agreed procedures and risk controls relevant to the activity being delivered.

Staff and volunteers must give due regard to health and safety at all times and must familiarise themselves with building and facility safety arrangements, including fire procedures, emergency exits and first aid provision.

8.2 Supervision arrangements

Fixed supervision ratios do not apply to adults at risk. Supervision arrangements must be:

- proportionate to the individual's needs and identified risks;
- informed by risk assessment; and
- designed to promote independence while ensuring safety.

Where 1:1 working is required, this must be risk-assessed and agreed in advance, with appropriate safeguards in place.

8.3 Working alone and professional boundaries

As with children, staff should avoid being alone with adults at risk wherever possible. Where lone working is necessary, this must be risk-assessed, authorised by line management, and conducted in line with Nova's lone working procedures. Staff must maintain clear professional boundaries at all times. Staff should not offer transport to adults at risk (including private vehicle use) unless this has been formally agreed, risk assessed and recorded. Where staff accompany adults at risk on public transport as part of planned activity or agreed support, this must be proportionate, transparent and consistent with the individual's capacity and consent.

8.4 Physical contact with adults at risk

Physical contact with adults at risk may be appropriate in some circumstances, particularly where it is required to:

- support mobility, participation or personal care;
- prevent harm or respond to an emergency;
- provide first aid or healthcare support.

Any physical contact must be:

- consented to by the adult, unless they lack capacity and action is required in their best interests;
- necessary, proportionate and the least restrictive option;
- respectful of dignity, privacy and personal boundaries.

Adults are presumed to have capacity in line with the Mental Capacity Act 2005. Where there are concerns about an adult's capacity to consent to physical contact, staff must seek guidance from the Designated Safeguarding Lead and act in accordance with best-interest decision-making.

Physical contact must never be coercive, controlling or excessive. Where ongoing or planned physical contact is part of service delivery, this must be risk-assessed, recorded and reviewed.

8.5 Consent, capacity and information sharing

Consent should be obtained directly from the adult at risk unless a formal legal arrangement is in place.

Information relating to adults at risk must be handled confidentially and shared only where necessary and proportionate, in line with data protection requirements and safeguarding duties.

8.6 Named safeguarding contact

Adults at risk should be informed of the named safeguarding contact within Nova to whom they can raise any concerns or worries, and how to access this support.

8.7 Recording and reporting concerns

All safeguarding concerns relating to adults at risk must be reported to the Designated Safeguarding Lead in accordance with **Section 14** of this policy.

Safeguarding responses will follow a person-centred approach, consistent with the principles of *Making Safeguarding Personal*, and will involve the local authority where statutory safeguarding thresholds are met.

9. Risk Assessments and Procedures for all trips and activities

Nova New Opportunities is committed to ensuring that **children, young people and adults at risk** are provided with safe and appropriate environments when participating in activities delivered by the Charity. In addition to completing formal risk assessments, staff must remain alert to safeguarding risks and **continually review and respond to changes** in the environment, activity, group dynamics or individual needs, making adjustments as necessary to maintain safety.

Risk assessments will consider the nature of the activity and its delivery arrangements, including, where relevant, staffing, supervision, participant needs, regulated activity and activity-specific or environmental risks. This safeguarding-focused risk assessment complements, but does not replace, the Charity's wider Health and Safety procedures.

Where staff signpost children, young people or adults at risk to activities delivered by **external organisations**, reasonable due diligence should be undertaken to satisfy staff that the organisation appears to have appropriate safeguarding arrangements in place. However, where Nova is **not directly involved in the delivery** of the activity, safeguarding and risk assessment remain the responsibility of the provider organisation. Parents/carers, or adults participating in their own right, are responsible for permitting and approving participation accordingly.

Further guidance on risk assessment processes and tools can be found in the Charity's **Health and Safety Policy**, which should be read in conjunction with this safeguarding policy.

10. Online Safety

10.1 Children and Young People

Nova recognises that safeguarding responsibilities apply equally to **online and in-person delivery**. Online environments present specific risks to children, including inappropriate contact, grooming, exposure to harmful content, and breaches of privacy. This section sets out the mandatory standards for safe 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 complete **online safeguarding induction and training** before delivery.
- Staff must be familiar with and follow Nova's **Online Safety Policy** and **Online Sessional Delivery Risk Assessment**.
- Online delivery is subject to the **same safeguarding standards as face-to-face provision**, including appropriate DBS clearance, professional boundaries, safeguarding reporting and CPOMS recording.

Online delivery standards

- Only Nova's **professional Zoom account** may be used. Staff must log in using their Nova email address.
- Attendance tracking must be enabled, with records retained for safeguarding and monitoring purposes.
- **Waiting rooms** must be enabled for all sessions to control entry and ensure only authorised participants are admitted.
- **Private direct messaging** between session participants must be disabled at all times.

Supervision and child protection

- Staff must **never be alone online with a single child or young person** unless a specific, pre-approved safeguarding or pastoral arrangement is in place, with **written parental consent** and recorded supervision arrangements.
- A minimum of **three children or young people** must be present for a session to proceed with one member of staff.
- If participant numbers fall below three during a session, the session must be **paused** and remaining participants placed in the waiting room until numbers are restored or an additional staff member joins.

These measures are in place to protect both children and staff and to prevent unsupervised one-to-one online contact.

Environment and professional conduct

When delivering online sessions with children, staff must:

- ensure **parental/carer consent** and emergency contact details are in place for all participants under 18;
- use a **neutral, professional background**, free from personal or identifying information;
- ensure no other adults are visible or audible during delivery;
- dress appropriately and maintain professional boundaries at all times;
- retain full control of screen-sharing and use only approved materials;
- not record sessions unless explicitly authorised, with parental consent and appropriate safeguarding controls.

Parent and carer engagement

- Parents/carers are provided with online safety guidance and encouraged to support and monitor their child's participation.
- Nova's **Family Agreement** is used to promote safe digital environments at home.

Risk assessment and reporting

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

10.2 Online Safety (Adults at Risk)

Nova recognises that online delivery with **adults at risk** may also present safeguarding risks, including exploitation, coercion, breaches of privacy and inappropriate contact. Online safeguarding for adults at risk is governed by the **Care Act 2014**, the **Mental Capacity Act 2005**, and the principles of *Making Safeguarding Personal*.

Unless otherwise stated below, the **general online safety standards set out in Section 10.1** apply equally when working with adults at risk. The following guidance highlights key differences.

Consent and participation

- Adults are presumed to have capacity to consent to online participation unless there is reason to believe otherwise.
- Consent should be obtained **directly from the adult**, unless a formal legal arrangement is in place.
- Where there are concerns about capacity, staff must seek advice from the Designated Safeguarding Lead and act in the adult's **best interests**.

Supervision and one-to-one working

- Fixed supervision ratios do not apply to adults at risk.
- One-to-one online working **may be appropriate**, provided it is risk-assessed, proportionate and agreed in advance.

- Where risks are identified, additional safeguards may include session recording (where lawful and consented), supervisory oversight, or the presence of a second staff member.

Professional boundaries and conduct

- Staff must maintain clear professional boundaries at all times and use only approved Nova platforms and accounts.
- Private messaging should be restricted to session-related communication only and must remain transparent and appropriate.
- Sessions must not be recorded unless lawful, necessary, and consented to, with safeguards clearly documented.

Risk assessment and reporting

- Online sessions involving adults at risk must be supported by a **safeguarding-focused risk assessment**, proportionate to the individual's needs and circumstances.
- Safeguarding concerns arising during online delivery must be reported to the Designated Safeguarding Lead and managed in line with **adult safeguarding procedures**, including referral to the local authority where thresholds are met.

11. Photography, Social Media & Communications

11.1 Children and Young People

Nova recognises that the use of photography, social media and digital communication presents specific safeguarding and data protection risks for children. This section sets out clear standards to ensure communication remains **safe, professional, transparent and appropriately monitored**, in line with statutory guidance and Nova's policies.

Guidance on taking photographs of children and young people

The taking, use and sharing of images of children is restricted for safeguarding and data protection reasons. Many schools, venues and partner organisations operate their own photography policies, which must also be followed.

Nova's approach is guided by two core principles:

1. **Safeguarding** — preventing children from being exposed to inappropriate attention or misuse of images;
2. **Data protection** — ensuring images are used lawfully, fairly and transparently.

Staff and volunteers must only take photographs or videos of children where:

- appropriate **written parental/carers consent** has been obtained in advance;

- the activity has been approved and is in line with Nova's **Photography and Sharing Images Policy**;
- images are taken using **Nova-approved equipment or accounts**.

Staff must **never**:

- take photographs of children or young people on personal devices for Nova-related activity;
- post or share images, videos or identifying information about children on **personal social media accounts**.

Children and families may be able to access personal information shared on social media, which can compromise professional boundaries and expose children to unsuitable content or contact. Allowing children to “connect” with staff on personal social media platforms is strictly prohibited.

Communicating with children and families

Staff and volunteers must not communicate directly with children or young people via personal social media accounts, private messaging platforms or personal email addresses.

Best practice for communication with children includes:

- **Communicating via parents/carers wherever possible**, particularly for logistical or organisational matters;
- Using only **Nova-approved communication channels**, such as:
 - generic Nova email accounts;
 - Nova-issued mobile or office phones;
 - approved public-facing Nova social media accounts for general updates.

Where direct communication with a young person is necessary and appropriate (e.g. older young people), staff must:

- use a **Nova staff email address** only;
- ensure communication is **transparent and professional**;
- **copy in another member of staff** or a manager wherever possible.

Staff must never:

- use personal email addresses, phone numbers or messaging apps to contact children;
- communicate with children using disappearing messages or untraceable platforms;
- initiate private or informal online conversations unrelated to Nova activity.

All communication must be appropriate, proportionate, recorded where necessary and capable of being audited.

Staff and volunteers must follow the Charity's **Code of Conduct** and **Online Safety Policy** at all times.

Raising concerns

If a staff member or volunteer becomes aware of any social media activity, digital communication or use of images involving a child or young person that raises a safeguarding concern, this must be **reported immediately to the Designated Safeguarding Lead (DSL)**.

Where a concern relates to the conduct or behaviour of a member of staff or volunteer, this must always be escalated directly to the DSL for advice and appropriate action.

11.2 Adults at Risk

When working with **adults at risk**, communication and digital engagement must remain professional, transparent and respectful, but **different legal principles apply**.

Adults are presumed to have capacity to consent to communication and digital engagement unless there is reason to believe otherwise. Direct communication with adults at risk **may be appropriate**, provided it is:

- consented to by the adult;
- proportionate and related to Nova activity;
- conducted using **Nova-approved communication channels** and staff email accounts.

Staff must not use personal social media accounts or private messaging platforms to communicate with adults at risk in a way that blurs professional boundaries. Where risks are identified, additional safeguards (such as copying in a manager or keeping written records) should be put in place.

Photographs or recordings of adults at risk must only be taken with **informed consent**, in line with data protection legislation and Nova's Photography and Sharing Images Policy.

Any concerns about digital communication, online behaviour or misuse of images involving adults at risk must be reported to the Designated Safeguarding Lead and managed in line with adult safeguarding procedures.

12. Complaints and Safeguarding

Nova New Opportunities recognises that complaints may sometimes raise, or be linked to, **safeguarding concerns**. All complaints made by parents/carers, participants, service users, staff, volunteers or members of the public will be managed in line with the Charity's **Complaints Policy and Procedures**.

Where a complaint relates to the **safety, welfare or protection of a child, young person or adult at risk**, or where safeguarding concerns are identified during the handling of a complaint, the matter must be **treated as a safeguarding concern** and reported immediately to the Safeguarding Team using the Charity's safeguarding CPOMS platform. Safeguarding concerns must not be dealt with solely through the complaints process.

All staff and volunteers are required to follow the Charity's safeguarding policies and procedures and to uphold professional standards of behaviour at all times. Where a complaint is upheld and identifies **inappropriate**

behaviour or practice, this will be addressed through the Charity's **disciplinary procedures**, and may result in further action, including referral to external agencies where required.

Safeguarding concerns relating to the **conduct or behaviour of staff or volunteers** will be handled sensitively and, where appropriate, confidentially.

- Concerns relating to the safeguarding of **children or young people** and the conduct of staff or volunteers will be referred to the **Local Authority Designated Officer (LADO)** in accordance with statutory guidance.
- Concerns relating to the safeguarding of **adults at risk** will be managed in line with the **Care Act 2014**, including referral to the Safeguarding Adults Team/Multi-Agency Safeguarding Hub (MASH) where thresholds are met.

Where a complaint or safeguarding concern involves a **member of the Safeguarding Team**, or a direct report of the Designated Safeguarding Lead, the matter must be escalated to the **Director of the Charity**.

Safeguarding concerns about the organisation, or concerns where individuals feel unable to raise issues internally, may be reported **directly to the LADO or relevant safeguarding partners**. Current contact details are provided in **Section 16** of this policy.

Whistleblowing

Nova encourages staff, volunteers, and partners to raise concerns about safeguarding practice or the conduct of staff where they believe that a child, young person, or adult at risk may be at risk of harm, or where organisational practice may fall below expected safeguarding standards.

Where concerns relate to the behaviour or actions of staff, management, or trustees, these may be raised through Nova's Whistleblowing Policy. Individuals raising concerns in good faith will be supported and protected in line with the Charity's whistleblowing procedures.

Whistleblowing concerns may also be reported directly to relevant statutory safeguarding agencies where appropriate.

13. Abuse, Neglect and Other Safeguarding Concerns

13.1 Children and Young People

Abuse and neglect are forms of maltreatment of a **child or young person**. Abuse may involve inflicting harm, or failing to act to prevent harm. Children and young people may be abused in a range of settings, including the family home, institutional, educational or community settings. Abuse may be perpetrated by an adult, parent or carer, another child or young person, or, more rarely, by a stranger.

Serious harm includes, but is not limited to, situations where a child or young person has sustained, as a result of abuse or neglect:

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

This definition is not exhaustive. A child's apparent recovery does not preclude serious harm having occurred. Parental or contextual factors such as **domestic abuse, substance misuse, mental ill-health, poverty, exploitation or online harm** may significantly increase safeguarding risk.

All staff and volunteers must be aware that the **four 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 or young person presents with indicators of abuse or neglect.

Further guidance on recognising signs of abuse is provided in **Appendix A**.

Responding to Disclosures (Children and Young People)

It is **not** the role of staff or volunteers to investigate suspected abuse. It **is** their responsibility to **recognise concerns and report them promptly** in line with this policy.

Where a child or young person discloses abuse or harm:

- they should be listened to calmly and taken seriously;
- they should be spoken to in a private space, **within sight but out of earshot of others**;
- they must not be promised confidentiality.

Staff should not interview the child, but may ask **open, non-leading questions** only to clarify what is being said.

Staff must:

- reassure the child that they have done the right thing by speaking up;
- avoid judgement, assumptions or speculation;
- explain clearly that the information will need to be shared with those who need to know;
- make a factual written record as soon as possible;

- report the concern **without delay** to the Designated Safeguarding Lead (DSL).

Staff must **never**:

- attempt to investigate or gather evidence;
- make promises they cannot keep;
- take sole responsibility for managing the concern.

The same approach applies where a disclosure is made **by another child or an adult** about the alleged abuse of a child.

Nova is a **referring organisation, not an investigative body**. Decisions regarding referral to Children's Social Care or consultation with the **Multi-Agency Safeguarding Hub (MASH)** rest with the DSL.

Bullying

Nova New Opportunities is committed to providing a caring, inclusive and safe environment for all children and young people. Bullying, including cyberbullying, is not tolerated in any activity delivered by the Charity.

Any concerns relating to bullying must be addressed promptly and in line with Nova's **Anti-Bullying Policy**.

Radicalisation and Extremism (Prevent Duty)

Children and young people may be vulnerable to **radicalisation and extremist influences**, including online. Radicalisation is the process through which individuals come to support extremist ideologies that may lead to terrorism or other forms of serious harm. Nova recognises its duties under the **Prevent Duty** and acknowledges that safeguarding includes protecting children and young people from being drawn into extremism.

All staff, trustees and volunteers must:

- be alert to indicators of radicalisation;
- report concerns immediately to the Designated Safeguarding Lead.

Staff working directly with children and young people are required to complete annual online **Prevent awareness training**, appropriate to their role. Where this is not practicable, individuals must have read and understood this policy and associated guidance.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in the United Kingdom and is recognised as a form of child abuse and violence against women and girls.

Professionals working with children have a **mandatory duty to report** known cases of FGM in girls under the age of 18 to the police. This duty applies where a professional either:

- is informed by a girl under 18 that she has undergone FGM; or
- observes physical signs that appear to show a girl has undergone FGM.

Where there are concerns that a child may be at risk of FGM, staff must follow Nova's safeguarding procedures and report the concern immediately to the Designated Safeguarding Lead (DSL). The DSL will make a referral to the appropriate safeguarding authority, including the Multi-Agency Safeguarding Hub (MASH), where required.

FGM risk may arise in situations where a child is taken abroad for an extended period, where there are discussions about special ceremonies or celebrations, or where there is a known family or community history of the practice. All concerns must be taken seriously and acted upon promptly.

13.2 Adults at Risk

Nova recognises its statutory duty to safeguard **adults at risk**, as defined by the **Care Act 2014**. An adult at risk is a person aged 18 or over who has care and support needs and is experiencing, or is at risk of, abuse or neglect, and as a result of those needs is unable to protect themselves.

Abuse or neglect of adults at risk may occur in similar settings to children and may be perpetrated by carers, family members, professionals, peers or others. Forms of abuse include (but are not limited to):

- physical, sexual and emotional abuse;
- neglect and acts of omission;
- financial or material abuse;
- discriminatory abuse;
- organisational abuse;
- domestic abuse, coercive control and exploitation.

Safeguarding adults is governed by **person-centred principles**, including empowerment, proportionality and partnership. Adults are presumed to have capacity unless there is evidence otherwise, in line with the **Mental Capacity Act 2005**.

Responding to concerns or disclosures (Adults at Risk)

Staff and volunteers must:

- take concerns seriously and respond respectfully;
- seek consent to act wherever possible;
- share information without consent where there is a risk of serious harm or abuse.

Concerns relating to adults at risk must be reported to the **Designated Safeguarding Lead** without delay. The DSL will determine whether the concern meets the threshold for referral to the local authority adult safeguarding team.

Nova does not investigate safeguarding concerns but will cooperate fully with statutory agencies where required.

Radicalisation and Extremism (Prevent Duty – Adults at Risk)

Nova recognises that the Prevent duty also applies to adults at risk, where an individual's care and support needs, mental health, learning disability, social isolation or experiences of exploitation may increase vulnerability to being drawn into terrorism or extremist activity.

In adult safeguarding, concerns relating to radicalisation are addressed within the **Care Act 2014 framework** and the principles of **Making Safeguarding Personal**. Adults are presumed to have capacity in line with the Mental Capacity Act 2005, and **consent should be sought** to take action wherever possible.

However, where there is a **risk of serious harm**, exploitation, coercive control, or a public safety concern, information may be shared and referrals made **without consent**, in line with statutory guidance.

Staff, trustees and volunteers must:

- remain alert to signs of vulnerability to radicalisation or extremist influence;
- report concerns promptly to the Designated Safeguarding Lead; and
- follow organisational Prevent and adult safeguarding procedures.

The Designated Safeguarding Lead will determine whether concerns meet the threshold for referral to adult safeguarding services, the local Prevent team or other statutory partners.

14. Reporting and Recording Safeguarding Concerns (CPOMS)

Nova New Opportunities has a statutory duty to ensure that any concern regarding the safety, welfare or protection of a child, young person or adult at risk is reported promptly and managed in accordance with national safeguarding legislation and guidance.

Safeguarding is everyone's responsibility. All staff, volunteers and sessional workers must act without delay where concerns arise. Failure to report a safeguarding concern is a breach of this policy and may result in disciplinary action.

Key principles

- Safeguarding concerns must be reported immediately — staff must not wait to gather full information.
- All staff are responsible for recognising and reporting concerns, not investigating them.
- CPOMS is Nova's required system for safeguarding recording and oversight.

- Confidentiality is respected; however, safeguarding overrides data protection where a person may be at risk of harm.

14.1 Safeguarding leadership and reporting structure

Nova operates a tiered safeguarding model to ensure concerns are responded to promptly, proportionately and consistently.

Designated Safeguarding Lead (DSL)

The DSL holds overall responsibility for safeguarding children, young people and adults at risk across the organisation, including statutory escalation and system oversight.

The DSL is responsible for:

- safeguarding leadership and accountability;
- managing serious concerns and external escalation;
- referrals to statutory agencies (Children's Social Care, Adult Social Care, LADO, Police);
- oversight of CPOMS and safeguarding records;
- chairing monthly Safeguarding Review Meetings;
- supervising and supporting Departmental Safeguarding Leads;
- ensuring policy, procedures and training remain compliant.

Deputy Designated Safeguarding Lead (DDSL)

The DDSL supports the DSL and holds equivalent authority when acting in their absence.

Departmental Safeguarding Leads

Each department has a Departmental Safeguarding Lead (usually the Department Head), who is the first point of contact for safeguarding concerns in their area.

They are responsible for:

- receiving initial concerns and CPOMS entries;
- undertaking proportionate initial enquiries and risk assessment;
- managing low-level, emerging or monitoring concerns;
- escalating concerns to the DSL where risk increases or thresholds are met;
- attending safeguarding supervision.

They operate under DSL oversight and do not replace the statutory role of the DSL.

14.2 Reporting procedure

If you are concerned that a child, young person or adult at risk may be experiencing harm, or a disclosure is made, you must:

- report the concern immediately to your Departmental Safeguarding Lead;
- if unavailable, report directly to the DSL or DDSL.

All concerns must be recorded on CPOMS at the earliest opportunity, even where information is incomplete.

Where a person is in immediate danger, or a criminal offence is suspected to be in progress, staff must contact the Police on 999 without delay, in addition to informing the DSL.

Staff may bypass departmental routes and report directly to the DSL or DDSL if they believe this is necessary.

14.3 Recording safeguarding concerns on CPOMS

CPOMS is Nova's secure electronic safeguarding system for recording, storing and reviewing concerns relating to children, young people and adults at risk.

All staff receive CPOMS training and are issued personal logins.

When recording a concern, staff must:

- submit the entry as soon as possible;
- record all actions taken, including who the concern was shared with, when, and any advice received;
- record factual, objective information only;
- use the individual's exact words in quotation marks where relevant;
- where injuries are observed, complete a body map where the system allows or describe location, size and appearance clearly;
- include date, time, location and witnesses;
- describe observed injuries (do not photograph unless authorised);
- avoid opinion, assumptions or diagnostic language.

Staff must not:

- investigate or question the concern;
- ask for written statements;
- promise confidentiality.

CPOMS automatically logs the identity of the reporting staff member and submission time.

CPOMS quality, oversight and governance

To ensure safeguarding records are robust and defensible:

- Safeguarding concerns must be reviewed and acted upon within appropriate timescales, proportionate to the level of risk.
- Records must be clear, accurate and professional.
- Entries must distinguish between fact, observation and action taken.
- CPOMS should be used to identify patterns, trends and emerging risks.
- Records must be reviewed regularly and not left open without rationale.

CPOMS does not replace direct safeguarding action where immediate risk is identified.

Access to CPOMS is role-based. The DSL retains full system oversight, and permissions are reviewed periodically.

Misuse of CPOMS, including inappropriate access or recording, may result in disciplinary action.

14.4 Review, decision-making and escalation

CPOMS reports are initially routed to the Departmental Safeguarding Lead.

The DSL reviews all safeguarding activity and undertakes a monthly review of records, themes, actions and escalation through Safeguarding Review Meetings.

Following review, the DSL (or DDSL) will determine whether:

- internal monitoring is appropriate;
- early help or support should be initiated;
- referral to statutory agencies is required.

All decisions and outcomes are recorded on CPOMS until closure.

14.5 External referrals

Where statutory thresholds are met, the DSL will make referrals to appropriate agencies. Nova does not investigate safeguarding concerns but will cooperate fully with statutory partners.

Once a referral is made, anonymity cannot be guaranteed. The DSL remains the point of contact and ensures all actions are recorded on CPOMS.

A safeguarding flowchart is provided in **Section 14.7**

Low-Level Concerns

Nova recognises the importance of identifying and responding to low-level concerns about staff or volunteer conduct at an early stage in order to maintain a safe culture and protect children and adults at risk.

A low-level concern refers to behaviour by a member of staff, volunteer, or partner that may be inconsistent with Nova's Code of Conduct or expected professional standards but does not meet the threshold for a safeguarding allegation. Examples may include boundary issues, inappropriate communication, or patterns of behaviour that could give rise to concern if left unaddressed.

All low-level concerns should be reported to the Designated Safeguarding Lead (DSL) or a member of the senior management team and recorded in line with Nova's safeguarding procedures. Concerns will be reviewed proportionately to determine whether further action, guidance, or escalation is required.

Recording and reviewing low-level concerns helps Nova identify patterns of behaviour, maintain professional standards, and ensure that safeguarding risks are addressed at the earliest possible stage.

14.6 Concerns about staff or volunteers

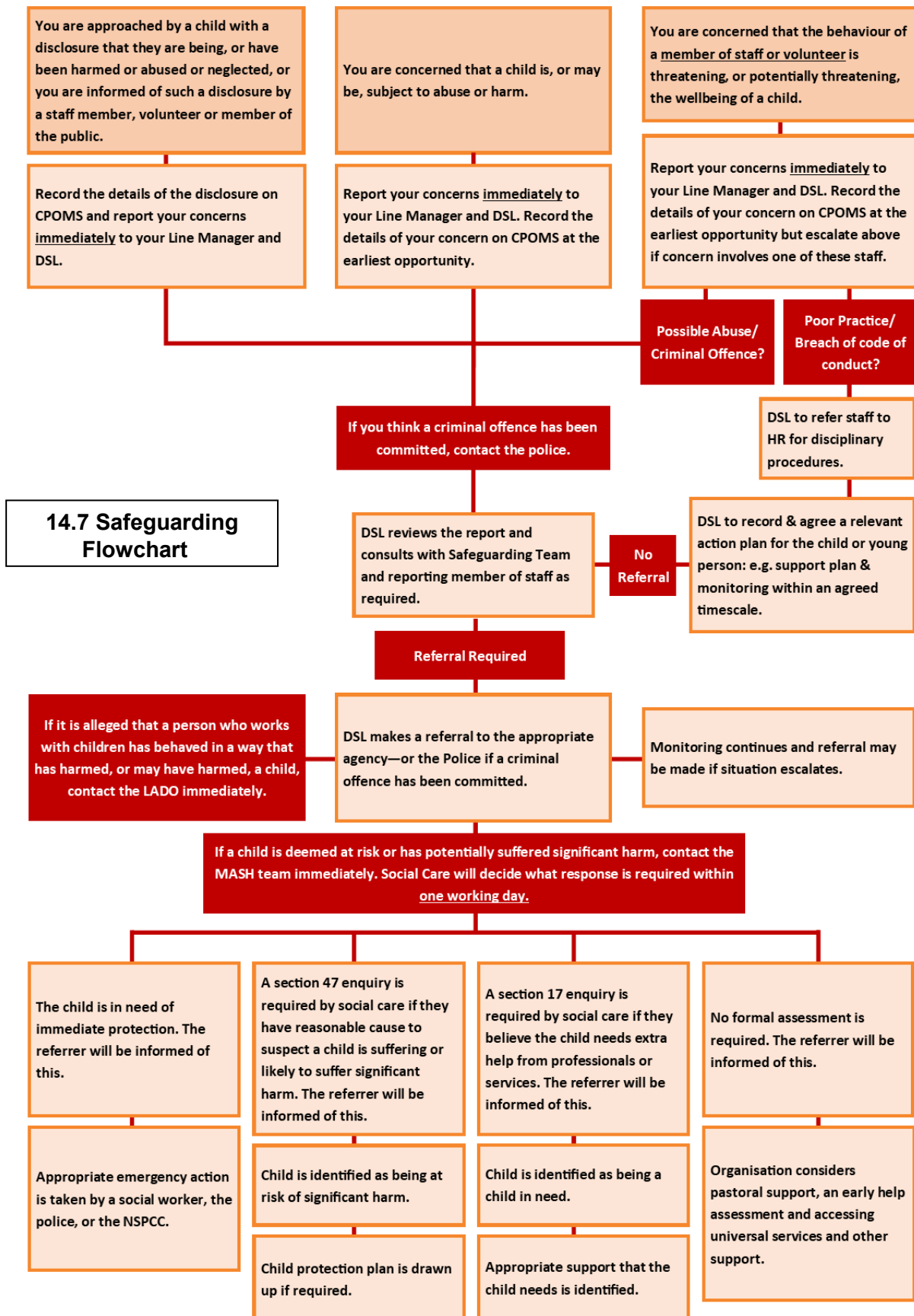
Concerns about the conduct of staff or volunteers must follow the same reporting process.

Concerns should be escalated to:

- the DSL, or
- the Director where the concern relates to senior staff.

Where internal reporting is inappropriate, concerns must be reported to the Director and/or the Local Authority.

Staff may report concerns externally if they believe appropriate action has not been taken. Relevant contacts are listed in **Section 16**.



15. Storage and confidentiality

- All safeguarding records are stored securely in CPOMS.
- Access is restricted to the DSL, DDSL(s) and Director.
- Paper records must be scanned, uploaded and securely destroyed.
- Records are managed in line with UK GDPR and safeguarding legislation.

16. Key Contacts

16.1 Nova New Opportunities contacts

Nova New Opportunities Director: **Lizzie Cho**, 07780 463336 / lizzie.cho@novanew.org.uk
Designated Safeguarding Lead: **Matthew Barnett**, 078450 422359 / matthew.barnett@novanew.org.uk
Deputy Safeguarding Lead: **Katya Elina**, 07515 101170 / Katya.Elina@novanew.org.uk

For **non-urgent** enquiries, email: safeguarding@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)

16.2 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

Emergency Response and Police

For immediate life-threatening emergencies, or where a serious crime is in progress or has just occurred, staff must contact the Police **immediately** by calling 999. This action must not be delayed. The Designated Safeguarding Lead (DSL) must be informed as soon as possible following contact with emergency services.

Where a safeguarding concern requires police involvement but does not present an immediate emergency, referral should be made via 101 or through the appropriate safeguarding channels, in consultation with the DSL.

Safeguarding incidents must be referred to the police force covering the location where the incident occurred, or where the individual at risk is located, as appropriate. Staff must ensure that the correct local police service is contacted, particularly where incidents take place outside the Royal Borough of Kensington and Chelsea or outside London.

The DSL will take responsibility for coordinating any ongoing liaison with the police and other statutory agencies.

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

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

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

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.

Multi-Agency Safeguarding Hub (MASH)– Allegations against Staff/Volunteers (Children)

Safeguarding Adults (Report abuse/neglect)

Telephone: 0207 361 3013

Email: socialservices@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 an adult at risk.

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.

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.

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.

For Service Users Resident Outside of the Royal Borough of Kensington and Chelsea

Nova New Opportunities is based in the Royal Borough of Kensington and Chelsea (RBKC), where most of our service users reside. Where a safeguarding concern involves a child or adult who is resident in a different local authority, responsibility for referral rests with the local authority of residence. In such cases, staff must identify the appropriate statutory safeguarding role and follow the safeguarding procedures and published contact details of the relevant local authority without delay.

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

Nova New Opportunities' Safeguarding Children and Adults at Risk Policy & Procedures is informed by the following key legislation and statutory guidance. These frameworks set out the legal duties, principles and expectations that underpin safeguarding practice across the organisation.

Children and Young People

Working Together to Safeguard Children (2026): Statutory multi-agency guidance setting out how organisations and professionals should work together to safeguard and promote the welfare of children. It defines roles, responsibilities, thresholds and processes for child protection. [Open document](#)

Children Act (1989 & 2004): Establish the legal framework for safeguarding children and place a duty on organisations to safeguard and promote children's welfare. The 2004 Act strengthened accountability and inter-agency cooperation. [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 the joint responsibilities of local authorities and health services to safeguard and promote the wellbeing of children in care, recognising their increased vulnerability to harm. [Open document](#)

Sexual Offences Act (2003): Defines criminal offences relating to sexual abuse, exploitation, grooming and abuse of trust, including offences involving children and young people. Informs staff conduct, professional boundaries and safeguarding responses. [Open document](#)

Female Genital Mutilation Act (2003): Criminalises Female Genital Mutilation (FGM) and establishes mandatory reporting duties for regulated professionals where FGM is identified in a child. [Open document](#)

Keeping Children Safe in Education (2026): Statutory guidance setting out safeguarding responsibilities; while aimed at schools, relevant to all children's organisations. [Open document](#)

Crime and Policing Act (2026)

Adults at Risk

Care Act 2014: Provides the statutory framework for safeguarding adults at risk. Defines adult safeguarding duties, thresholds and responsibilities, and establishes the principles of empowerment, proportionality, protection, partnership and accountability.

Care and Support Statutory Guidance (updated regularly): Statutory guidance accompanying the Care Act 2014. Sets out how adult safeguarding duties should be implemented in practice, including information-sharing, consent, enquiries and multi-agency working.

Mental Capacity Act 2005 and Code of Practice: Establishes the legal framework for decision-making on behalf of adults who may lack capacity. Central to safeguarding adults at risk, including consent, best-interest decisions and least-restrictive practice.

Domestic Abuse Act 2021: Recognises domestic abuse as a safeguarding issue affecting both children and adults, including coercive control, economic abuse and psychological harm. Relevant to adult safeguarding responses and risk assessment.

Counter-Terrorism and Security Act 2015 (Prevent Duty): Places a duty on specified authorities to have due regard to preventing people from being drawn into terrorism. Applies to both children and adults, with adult cases managed through Care Act safeguarding principles and capacity-led decision-making.

Appendix A

Types of Abuse: Recognising Abuse, Neglect and Other Safeguarding Concerns

Safeguarding concerns may arise through direct disclosure, observation, information from others, or changes in behaviour, presentation or circumstances. Abuse and neglect do not always present as a single incident and may involve a **pattern of concerns over time**.

Staff and volunteers are **not expected to diagnose abuse**. If a concern arises, it must be **reported promptly** in line with this policy, even where there is uncertainty.

Children and Young People

Abuse and neglect are forms of maltreatment of a child or young person and may be inflicted deliberately or through a failure to act. Children may be abused in family, community, institutional or online settings, and by adults or other children.

The main categories of abuse recognised in statutory guidance are:

Physical abuse

Includes hitting, shaking, burning, scalding, poisoning, suffocation or other physical harm. Female Genital Mutilation (FGM) is a form of physical abuse and is a criminal offence.

Emotional abuse

The persistent emotional maltreatment of a child that causes severe and adverse effects on emotional development. This may include humiliation, rejection, intimidation, isolation, exposure to domestic abuse or serious bullying.

Sexual abuse

Involves forcing or enticing a child to take part in sexual activities, whether or not the child understands what is happening. This includes physical contact, non-contact activities (such as exposure to sexual imagery), and sexual exploitation. Sexual abuse can be perpetrated by adults or other children.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development. Neglect may occur before or after birth and may be linked to wider parental or contextual factors.

Some level of emotional abuse is present in all forms of child maltreatment.

Adults at Risk

Abuse or neglect of adults at risk may occur in similar settings and relationships to those affecting children and may be perpetrated by carers, family members, professionals, peers or others.

In line with the Care Act 2014, forms of abuse or neglect include (but are not limited to):

- physical, sexual and emotional abuse
- neglect and acts of omission
- financial or material abuse
- discriminatory abuse
- organisational abuse
- domestic abuse, coercive control and exploitation

Safeguarding adults is **person-centred**. Adults are presumed to have capacity unless there is evidence otherwise, and consent should be sought wherever possible. However, information may be shared and action taken without consent where there is a **risk of serious harm**, abuse or exploitation.

Key Principles for Staff and Volunteers

- The welfare and safety of the individual is paramount.
- Abuse and neglect may be hidden and cumulative.
- Early reporting helps prevent escalation.
- Concerns must be recorded factually and contemporaneously.
- If in doubt, **report and seek advice from the Designated Safeguarding Lead**.

Detailed guidance on recognising indicators of abuse, neglect, exploitation or radicalisation is provided through training and supervision, not within this policy.

Document Control Sheet

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Document History:

Version	Type of Change	Date	Revisions from previous issues	Review Undertaken by	Revision approved by
2.0	Major revision / full rewrite	27/04/26	Complete rewrite of safeguarding policy, including integration of Adults at Risk policy, updated statutory guidance and strengthened procedures and governance	Matthew Barnett (DSL)	Lizzie Cho (Director), Katya Elina (DDSL), Leslie Ramos (Trustee, Safeguarding Advisor), Stewart McCure (Chair of Trustees)
2.1	Legislative and procedural update	11/09/26	Targeted legislative and procedural update following removal of the supervision exemption from regulated activity with children from 1 September 2026; clarification of the status and safeguarding arrangements for young participants undertaking supported leadership/peer mentoring; updated statutory guidance references and minor technical corrections	Matthew Barnett (DSL)	Lizzie Cho (Director), Katya Elina (DDSL)