



# Safeguarding and Child Protection Policy 2024 - 2025

Approval date:	April 2024
Review date:	March 2025
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# 1. The scope and purpose of this policy statement

## About Milestone Mentoring

Milestone mentoring has been established to support the needs of neurodiverse young people who are currently struggling in education.

Our mission is to work with young people to help them to understand the diagnosis and how it affects them.

We work to help them to unlearn unhelpful ways of managing in order to learn new and positive strategies so they can fulfil their potential and become contributing members of their community.

We offer mentoring services as well as tutoring for neurodiverse young people currently struggling in their educational setting or who are currently not attending school.

Our principles

1. Child centred focus
2. Inclusive practice
3. Holistic understanding
4. Trauma-informed care
5. Solution-focussed support
6. Practical skills development
7. Empowerment and self-discovery
8. Collaborative partnerships.

All our work with young people is aimed at developing three key areas:

- a. Emotional understanding – learning about themselves and their diagnosis
- b. Social understanding – learning about themselves in the context of other people
- c. Academic achievement – helping them to fulfil their potential.

Milestone Mentoring is a limited company (Company no. 610994408) with public liability, employer's liability and professional indemnity insurance (copies of insurance documentation are available on request).

## Purpose of this policy

Milestone Mentoring believes that no child or young person should ever experience abuse of any kind. We know we have a responsibility to promote the welfare of children and young people, and to keep them safe. We recognise that in all aspects of our work that staff have responsibilities for safeguarding and child protection. Milestone Mentoring accepts that safeguarding and child protection is the responsibility of everyone.

The policy sets out how we ensure that safeguarding is at the heart of all we do.

The purpose of this policy is:

- to protect children and young people who receive our services from harm. This includes the children of adults who receive our services or who work alongside us.
- to provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.

This policy applies to all members of staff, volunteers, contractors, and external service providers.

## 2. Legal Framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England.

The relevant legislation and guidance in England includes:

- Children Act 1989
- United Nations Convention on the Rights of the Child, ratified by the UK in 1991
- The Education Act 2002
- The Children Act 2004
- The Equality Act 2010
- Children and Social Work Act 2017
- The Domestic Abuse Act 2021
- Working Together to safeguard children and young people 2023
- The Children's Social Care National Framework 2023
- Keeping Children Safe in Education 2024

## 3. Our practice

We recognise that:

- the welfare of children is paramount in all the work we do and in all the decisions we take
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse
- we should understand factors pertaining to safeguarding children who come from Black, Asian, and minoritised groups, including children who are refugees
- children and young people who have a disability are additionally vulnerable to abuse, as are children with special educational needs and disabilities
- there are ongoing barriers for children who are LGBTQ+ to trust in services and be safeguarded
- children who have had adverse childhood experiences, have had or have a social worker, especially Children We Care For/Adopted/in Kinship Care will have issues which make them additionally vulnerable

## 4. We will seek to keep everyone safe

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

- valuing, listening to and respecting them
- appointing a nominated child protection lead (DSL) for children and young people. As the company grows, we will appoint a deputy and a lead board member for safeguarding
- adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- developing and implementing an effective online safety policy and related procedures
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures, so that all staff, volunteers, and service users, know about and follow our policies, procedures and behaviour codes confidently and competently
- recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- recording and storing and using information professionally and securely, in line with data protection legislation and guidance [more information about this is available from the Information Commissioner's Office: [ico.org.uk/for-organisations](https://ico.org.uk/for-organisations)]
- sharing information about safeguarding and good practice with children and their families: via leaflets, on our website, and in one-to-one discussions
- making sure that children, young people and their families know where to go for help if they have a concern
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- using our procedures to manage any allegations against staff and volunteers appropriately
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we work with children and young people in a safe physical environment, which staff and volunteers, judge meet health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding ethos/culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns.

## 5. Dealing with a Concern and Record Keeping

If a member of staff has a concern about a child or if a child tells them they are being abused, exploited or neglected. Staff will understand that if a disclosure is mismanaged, it not only makes the event more difficult for the child, but it could potentially affect investigations, including criminal prosecutions. Staff will appropriately respond by listening and offering reassurance, such as: 'what you are saying is important'; 'I am glad you were able to tell me'; 'I will do my best to help you'; 'this is so important I need to talk to someone about it'.

Staff should:

1. Listen to the wishes and feelings of the child, but not to promise confidentiality.
2. Make an accurate factual record as soon as possible including details of:
  - Dates and times of their observations, including who was present at the time
  - Any injuries and recorded on the body map
  - Explanations given by the child / young person in their actual words or phrases
  - Any questions the staff member asked (remembering not to ask any leading questions)
  - What action was taken
  - Dates and times of any discussions in which they were involved

Written records should always be factual and not opinion-based and naturally avoid judgements. These records will be uploaded to Milestone Mentoring's digital record system.

3. Report it to the Milestone Mentoring's DSL immediately. This person will contact the young person's school DSL to discuss the concern.
4. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
5. In the absence of the DSL, staff can refer directly to MASH, or the child's social worker (if applicable) and the police (if appropriate), if they are worried that the child is suffering or is at risk of suffering significant harm.

The DSL will ensure any decisions and justifications for decisions made will be recorded in writing, with clear outcomes documented following any action taken. Milestone Mentoring will discuss any concerns we have with the young person's parents. There may be occasions when this is not appropriate. Staff would then consult with other agencies prior to involving parents. We will record any decision not to discuss with parents and the reasons why, as part of the actions.

Safeguarding records will be scanned and uploaded onto Milestone Mentoring's secure external hard-drive and this will be kept in a secure, fire resistant store. All records will be kept in accordance with General Data Protection Regulations (GDPR).

## 6. Confidentiality and Sharing Information

We recognise that matters relating to child protection are confidential. Information is only ever shared on a 'need to know' basis. Staff will keep a record of their decision and the reasons for it - whether it is to share information or not. If they decide to share, then the record will contain what has been shared, with whom and for what purpose. Staff will adhere to the 7 golden rules of information sharing:

1. Remember that the General Data Protection Regulations (GDPR), Data Protection Act 2018 and human rights laws are not barriers to justify information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how, and with whom, information will or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners or your information governance lead if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible share with consent and, where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful reason to do so, such as where safety may be at risk. You will need to base your judgment on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (Practitioners must always follow their organisation's policy on security for handling personal information).
7. Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose

## 7. Staff Recruitment

Our commitment to safeguarding young people includes arrangements for recruiting staff.

All staff applying to work with Milestone Mentoring:

- Are required to complete an application form
- Provide at least two references
- Complete an enhanced DBS
- Provide copies of qualifications if appropriate
- Provide evidence of their identity (original passport or driving licence).

Senior leaders are required to:

- Identify any gaps in employment and the reasons for these
- Independently verify references
- Record all details of the application process, including decision made and copies of relevant documentation.

All information regarding recruitment will be recorded and stored separately on Milestone Mentoring's secure drive.

## 8. Modern slavery

Our company is not required to provide a statement under The Modern Slavery Act (2015). However, we are committed to following best practices to ensure that no instances of modern slavery occur in our business nor in those businesses and organisations we work with.

To this end, we:

- Encourage all employees and workers to report any suspicions of modern slavery that they encounter
- Ensure that employees and workers take holidays and rest breaks as part of health and safety regulations
- Ensure that the employment of the workforce and recruitment practices including those directly and indirectly employed comply with working regulations, such as national minimum wage, health and safety and working time directives
- Provide staff training to increase awareness of modern slavery
- Request confirmation from all external organisations that modern slavery is not part of their business and supply chains.

## 9. Training

All staff are required to undertake mandatory training as offered by the Oxfordshire Safeguarding Children Board. This training will be updated at intervals in accordance with guidance from OSCB. It is the responsibility of the Business Lead and staff to ensure that training is undertaken in a timely manner and at an appropriate level. This needs to include Prevent training.

All staff training will be recorded in a record within the staff section of our secure drive.

All meetings involving Milestone Mentoring staff will involve an agenda item specifically regarding safeguarding and child protection. This will provide staff the opportunity to share information and updates (including learning from previous concerns).



## 10. Whistleblowing

Whistleblowing is the act of reporting a concern within an organisation normally involving a person senior to them.

Staff will understand that Whistleblowing means when a person raises a concern about dangerous, illegal activity, or any wrongdoing, within their organisation. Whistleblowing can include sharing potentially vital information about health and safety issues. Examples of whistleblowing include danger to the public, danger to the environment, putting the safety of someone in their organisation at risk, assault of a child, fraud. In safeguarding, this could mean knowing that a child protection issue is not being dealt with appropriately, or knowing that an organisation is not following procedures, such as a referral to the LADO.

All staff are actively encouraged to report any concerns, regardless of who the concern may be regarding. No staff will be punished or disciplined for raising concerns.

As a small organisation, Milestone Mentoring would recommend that staff contact the NSPCC whistleblowing line 0800 028 0285.

If you believe that a young person is being abused, you can make a referral to Children's Social Care on 0345 050 7666 (office hours) or 0800 833 408 (outside office hours).

## 11. Policy Review

This policy will be reviewed annually.

## 12. Contact details

Nominated child protection lead /DSL:

Name: Simon Bishop

Email: [simon.bishop@milestonementoring.co.uk](mailto:simon.bishop@milestonementoring.co.uk)

Telephone: 07725046185

External contacts

Organisation	Contact
Education Safeguarding Advisory Team(ESAT)/ Local Authority Designated Officers (LADOs)	01865 810603 Lado.safeguardingchildren@oxfordshire.gov.uk ESAT.safeguardingchildren@oxfordshire.gov.uk
Locality Community Support Service (LCSS) worker	<a href="mailto:LCSS.Central@oxfordshire.gov.uk">LCSS.Central@oxfordshire.gov.uk</a> 0345 241 2705
Multi Agency Safeguarding Hub (MASH)	0345 050 7666
Out of hours Emergency Duty Team (EDT)	0800 833408
Police	101 or in emergencies 999

Policy approved by:

Date:

## Appendices

### Appendix 1: Safeguarding Issues

This is taken from *Keeping Children Safe in Education (2024)*

#### Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

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

##### *Child Criminal Exploitation (CCE)*

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

##### *Child Sexual Exploitation (CSE)*

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

Should any member of staff, volunteer, or contractor have concerns about the well-being and safety of any of the young people we work with you should refer to [Section 6](#) of this document.

## Appendix 2: Safeguarding Issues

This is taken from *Keeping Children Safe in Education (2024)*

### What staff should look out for: Abuse & Neglect

Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. All staff should be aware of indicators of abuse, neglect and exploitation, so that they are able to identify cases of children who may be in need of help or protection. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

If staff are unsure, they should always speak to the designated safeguarding lead (or a deputy). Forms of abuse and neglect

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

**Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

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

#### Child-on-child abuse

All staff should be aware that children can abuse other children at any age (often referred to as child-on-child abuse). And that it can happen both inside and outside of school or college

and online. It is important that all staff recognise the indicators and signs of abuse and know how to identify it and respond to reports.

All staff should be clear as to the school or college's policy and procedures with regards to child-on-child abuse. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment

Should any member of staff, volunteer, or contractor have concerns about the well-being and safety of any of the young people we work with you should refer to [Section 6](#) of this document.