

Project Challenge



Believes in Young People

**Safeguarding, Child Protection
and Prevent Policy
2024-25**

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1. Introduction

Project Challenge takes the safeguarding of its students very seriously and is fully committed to the well-being of all students, staff and those with links to the Project Challenge. The safety of all people involved with Project Challenge life is a high priority and this policy sets out the essential requirements to ensure the welfare of all of those involved with Project Challenge.

The purpose of the policy is to:

- safeguard all Project Challenge students, specifically children, young people and adults, by setting out clear expectations of all Project Challenge users and employees that meet our legal obligations and place the welfare of our students at the forefront of our practices.
- safeguard Project Challenge, all staff, volunteers and partners in carrying out their duties in teaching, supervising and supporting students on Project Challenge premises and other external facilities.
- set out clear guidelines for the handling of safeguarding concerns to ensure that all disclosures, referrals and monitoring are handled with sensitivity and professionalism in ways that support the child, young person or adult at risk.
- safeguard all students from extremism and radicalisation through application of safeguarding practices that support the Government's Prevent Strategy.

Project Challenge believes that no child, young person or adult should experience abuse of any kind. We are committed to their protection through the integration of this policy into all working practices. Project Challenge has incorporated child protection into the organisational approach to safeguarding and the term safeguarding is deemed to include child protection in all policies and procedures.

All employees, supply teachers, contractors, volunteers and associates must comply fully with this policy at all times to promote the welfare of all children, young people and adults at risk who encounter Project Challenge in any capacity. This policy links closely with the working practices of the CSCP (Calderdale Safeguarding Children Partnership) & CSAB (Calderdale Safeguarding Adults Board).

This policy applies equally to students who are aged under 16 years. In these circumstances, individual risk assessments may apply to safeguard a student who is studying at Project Challenge prior to their 16th birthday, taking into consideration their particular set of circumstances.

2. Relevant Legislation, Statutory Guidance and Best Practice

The titles below indicate the legal framework informing this policy. Each title is the most up to date version of each document and include all ongoing revisions and outcomes of consultations. Each title is a hyperlink, taking the reader straight to the document if you are viewing this policy electronically.

Title	Date of issue/Update
Working Together to Safeguard Children (2018) Working together to safeguard children - GOV.UK (www.gov.uk)	July 2018
Changes to statutory guidance: Working Together to Safeguard Children; and new regulations (publishing.service.gov.uk)	February 2018
Prevent duty guidance - GOV.UK (www.gov.uk) (including Prevent duty guidance: for further education institutions in England and Wales and the Counter-Terrorism Act 2015)	April 2021
Inspecting safeguarding in early years, education and skills settings - GOV.UK (www.gov.uk)	September 2019
[Withdrawn] Sexual violence and sexual harassment between children in schools and colleges - GOV.UK (www.gov.uk)	September 2019
Child sexual exploitation: definition and guide for practitioners - GOV.UK (www.gov.uk)	February 2019
Child sexual exploitation: definition and guide for practitioners - GOV.UK (www.gov.uk)	February 2017
Children missing education - GOV.UK (www.gov.uk)	September 2016
Child abuse concerns: guide for practitioners Stat guidance template (publishing.service.gov.uk)	March 2015
Children who run away or go missing from home or care - GOV.UK (www.gov.uk)	January 2014
The right to choose: multi-agency statutory guidance - GOV.UK (www.gov.uk)	January 2013
Safeguarding Vulnerable Groups Act 2006 (legislation.gov.uk)	November 2006
Education Act 2002 (legislation.gov.uk)	July 2020
Multi-agency statutory guidance on female genital mutilation - GOV.UK (www.gov.uk)	July 2020
Promoting the education of looked-after and previously looked-after children - GOV.UK (www.gov.uk)	February 2018
Supervision of activity with children - GOV.UK (www.gov.uk)	September 2012
SEND Code of Practice January 2015.pdf (publishing.service.gov.uk) (0 to 25 years)	January 2015
Information sharing: advice for practitioners (publishing.service.gov.uk)	July 2018
Care Act 2014 (legislation.gov.uk)	May 2014
Homelessness code of guidance for local authorities - Guidance - GOV.UK (www.gov.uk)	June 2020

In the discharge of its functions, and in implementing this policy and procedure, Project Challenge will remain mindful of its duty of care and other legal obligations. Such as, those it owes under the Health and Safety at Work Act 1974, the Data Protection Act 2018, the Safeguarding Vulnerable Groups Act 2006, Equality Act 2010, the Protection of Freedoms Act 2012, the Counter Terrorism and Security Act 2015.

3. Related Policies

Project Challenge will keep its policies and procedures on children, young people and adults at risk under review to take account of any new Government legislation, regulations or best practice documents. This will ensure staff are kept fully up to date with their responsibilities and duties with regard to the safety and wellbeing of children, young people and adults at risk.

This policy should be read alongside our policies and procedures on:

- Learner Disciplinary Procedure
- Malpractice and Misconduct Policy
- Learner Agreement on attendance, punctuality and bullying and harassment Policy
- Appeals Policy and Procedure
- Equality and Diversity Policy
- Health and Safety Policy
- Distance and Blended Learning Policy
- General Data Protection Regulations (GDPR) Policy

4. Responsibilities

Project Challenge will ensure a clear and transparent framework for reporting and managing safeguarding concerns. The hierarchy and responsibility for implementation and reporting is detailed below.

The Management Board :

- must ensure a whole Project Challenge approach to safeguarding and must also be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2021 22, (including the Public Sector Equality Duty 23) and the local multi-agency safeguarding arrangements
- must comply with statutory safeguarding procedures including undertaking training
- have regard to the DfE statutory guidance 'Keeping Children Safe in Education' to ensure that the policies, procedures and training in the Project Challenge are effective and comply with the law at all times
- must appoint a member of staff who is designated to take lead responsibility for safeguarding; the Designated Safeguarding Lead (DSL)
- have procedures for reporting and dealing with allegations of abuse against members of staff and volunteers

Designated Safeguarding Trustee

The designated safeguarding Trustee is responsible for working with the DSL to:

- ensure Project Challenge has safeguarding policies and procedures, which are consistent with the both national and local procedures.
- complete a review of safeguarding on an annual basis.
- ensure the Board receives an annual report on safeguarding activity.
- ensure that safeguarding training is provided to the Board.

The DSL is responsible for liaising with and reporting to the Board on safeguarding matters.

Designated Safeguarding Lead (DSL)

The Business Manager (BM) is Project Challenge's DSL. The BM is responsible for overseeing all safeguarding operations including supervision, disclosures, referrals, interventions and record keeping. During term time, the DSL or Deputy must always be available to support with safeguarding concerns.

Project Challenge DSL

The DSL will have responsibility for their team's compliance with the policy, including the delivery of safeguarding and online safety training to staff and students. The DSL will advise and make recommendations on the implementation of the policy where required.

Safeguarding Team

The Project Challenge's Safeguarding Team is made up of the DSL and Deputy DSL.

The Safeguarding Team is responsible for:

- making and receiving the referral of cases of suspected abuse or allegation to/from the appropriate external referral agency within 24 hours of contact
- offering consultation and providing advice and support to other staff on issues relating to safeguarding children, young people and adults at risk
- ensuring that parents, guardians and carers of children, young people and adults at risk within Project Challenge are aware of Project Challenge's policy and procedures
- working with Calderdale Children and Young People Service, CSCP & CSAB and other appropriate agencies
- acting as or ensuring that all students under the age of 18 have an Appropriate Adult when questioned by the police
- liaising with the associated secondary schools for pupils under the age of 16 who study at Project Challenge to ensure that appropriate arrangements are made
- dealing with individual cases, including attending case conferences and review meetings as appropriate
- ensuring that all partner providers have appropriate policies and procedures in place through liaison with designated officers within those organisations
- attending training in safeguarding children and any other specialist training and inter agency working as required by the CSCP & CSAB
- ensuring that all staff receive training in safeguarding and are aware of the Project Challenge's procedures for protecting children, young people and adults at risk during their induction programme. All staff are required to update this training every two years or earlier if there are any significant changes to legislation or statutory guidance.

- providing information for the designated safeguarding Trustee, including the production of a report for all Board meetings setting out how Project Challenge has discharged its safeguarding duties
- reviewing and updating this policy on an annual basis.

All members of Staff

Safeguarding is the responsibility of all employees, volunteers, trainees and associates, collectively referred to as Project Challenge Staff.

All members of Project Challenge staff must attend Level 1 and Level 2 safeguarding training at their Induction programme and refresher/update training every two years. This is to develop their understanding of the signs and indicators of abuse and ensures they know how to respond when a safeguarding issue is disclosed. This provides a detailed understanding of safeguarding and professional boundaries and will be refreshed/updated every two years, or sooner, if there are any significant changes to safeguarding requirements.

The Safeguarding Team will provide regular bulletins to ensure staff are updated on safeguarding practices, local concerns, emerging safeguarding issues. All staff have a responsibility to read these in full.

All tutors and support staff have a duty to teach their students about safeguarding and ensure they know how to report a safeguarding concern.

All staff must recognise that safeguarding disclosures are confidential.

Safeguarding is a standing agenda item on the Project Challenge weekly Team meeting.

All members of staff involved in student induction and tutorials should ensure that they provide students with appropriate information relating to safeguarding.

All members of staff are responsible for their own knowledge of the following policies and must be aware of the systems that support:

- The Safeguarding Policy (including the roles of the Safeguarding Team)
- Learner Agreement
- The Staff Code of Conduct.

Human Resources (HR)

HR has policies and procedures in place, which cover safeguarding and safer recruitment. HR are responsible for maintaining records that record pre and any post-employment checks (statutory and otherwise) on the suitability of staff to undertake regulated activity. The Operations or Business Manager is responsible for completing a DBS referral for any employee/volunteer/trainee or associate undertaking regulated activity who has been dismissed due to safeguarding concerns, or who would have had they not resigned. This

will be conducted in collaboration with the DSL and the Local Authority Designated Officer (LADO).

Confidentiality

- All staff have a responsibility to report safeguarding matters to the DSL. Once reported, safeguarding issues are confidential and staff must not discuss them with anyone other than the Designated Safeguarding Team, their line managers and multi-agency support representatives as appropriate.
- Staff have a professional responsibility to share information with other agencies in order to safeguard children, young people and adults at risk.
- All staff must be aware that they cannot compromise a child, young person or adult at risk by keeping secret information that may compromise the safety of that person or another in their care.
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Wherein doubt staff should contact the Safeguarding Lead.
- Any member of staff receiving a safeguarding concern must report the disclosure on the same working day on which they received/observed it.
- The DSL is able to support any member of staff for whom receiving a safeguarding disclosure has resulted in personal upset.

5. Definitions

The following definitions apply to the care and support provided to students at Project Challenge.

Child

A child is defined as anyone under the age of 18 years (the Children Act 1989, Education Act 2002).

Adult at Risk Aged 18 years or over, an “adult at risk” according to the Care Act 2014, is an adult who:

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

Children in Need of Protection and Early Help

Some children and young people are in need because they are suffering or likely to suffer “significant harm”. Where local authorities believe a young person is suffering, or likely to suffer, significant harm, they have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a young person. The DSL or Deputy can do this through contacting the Calderdale Early Intervention Team [Calderdale Early](#)

[Intervention \(EIS\) | Calderdale Council](#) to share concerns and ensure the early identification of needs within families.

Children in Need (CIN)

Children and young people who are defined as being “in need” under Section 17 of the Children Act 1989, are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of service(s). A child with a disability is a child in need.

Children Looked After (CLA)

The most common reason for children becoming looked after is because of abuse and/or neglect. The Safeguarding Team will ensure that staff have the skills, knowledge and understanding necessary to keeping children looked after safe. The appropriate staff will have the information they need in relation to a child’s looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child’s care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Safeguarding Team will be responsible for attended PEP meetings for children who are looked after.

Significant Harm

The concept of significant harm is the threshold that justifies compulsory intervention into family life in the best interests of the child or young person and gives local authorities a duty to make enquires as to whether to take action (Section 47, Children Act 1989) to safeguard or promote the welfare of a young person who is suffering, or likely to suffer significant harm. The Act also gives powers to the Police to take emergency action to protect a young person from significant harm.

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships.

Calderdale Safeguarding Children Partnership (CSCP)

The Calderdale Safeguarding Children Partnership (CSCP) consists of three safeguarding partners, Calderdale MBC, West Yorkshire Police, Calderdale Clinical Commissioning

Group, who have a shared and equal duty to make arrangements to work together to safeguard and promote the welfare of all children in a local area.

Calderdale statutory partners together with representatives from schools, the voluntary sector and all organisations working with children, young people and families have a duty to work together to safeguard and promote the welfare of children.

Calderdale Safeguarding Adults Board

Calderdale Safeguarding Adults Board is a partnership body that is independent of all the organisations that work with adults at risk in Calderdale. A Local Safeguarding Adult Board (LSAB) is a statutory body, so every area has to have one and the Council have a special responsibility to ensure that it is effective in what it does. Members of the Board represent all types of organisations and groups and have an equal say.

Abuse

“Abuse” relates to the mistreatment of an individual’s human and civil rights by any other person or persons and may consist of single or repeated acts. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

Type of abuse	Description of abuse
Physical abuse	<i>Including hitting, slapping pushing, misuse of medication, restraint or inappropriate physical sanctions.</i>
Sexual abuse	<i>Child: Including being forced to take part in sexual activities that may or may not include physical contact. 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 (including via the internet). Adult: Including rape and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.</i>
Child-on-child abuse	<i>Young people are capable of abusing each other. This can include bullying (including online), abuse within intimate partner relationships, physical abuse, psychological abuse and sexual violence, sexual harassment, sexting and hazing. It can take place in Project</i>

	<i>Challenge, outside of Project Challenge and online. It is vital that we recognise signs of child-on-child abuse and do not attribute it to 'banter'. Behaviours that cause harm to others are abusive. ALL staff have a duty to report concerning behaviours where they believe a student may be at risk.</i>
Psychological abuse	<i>Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks.</i>
Financial or material abuse	<i>Including theft, fraud, exploitation, coercion in relation to an adult's financial affairs or arrangements, such as connection with wills, property, inheritance or financial transactions, or the misuse of property, possessions or benefits.</i>
Neglect and acts of omission	<i>The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. Including ignoring medical or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.</i>
Discriminatory abuse	<i>Including discrimination on grounds of race, gender and gender identity, disability, sexual orientation, religion, and other forms of harassment, slurs or similar treatment.</i>
Institutional abuse	<i>Including neglect and poor care practice within an institution or specific care setting like a hospital or care home, for example. This may range from isolated incidents to continuing ill-treatment.</i>
Online abuse	<i>Any type of abuse that arises through use of the internet. This can include social media, gaming online or the use of mobile phones.</i>
Domestic abuse (also known as Intimate Partner Violence)	<i>Domestic abuse can be psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.</i>
Exploitation	<i>Either opportunistically or premediated, unfairly manipulating someone for profit or personal gain.</i>
Child Sexual Exploitation (CSE) Child Criminal Exploitation (CCE)	<i>CSE and CCE are forms of abuse and occur where an individual, group or peer manipulates or deceives a child or Adult at risk to participate in sexual or criminal activity. Victims may be being exploited when activity appears consensual and the victim is compliant. CSE and CCE May be physical, psychological and /or take place on line. CSE may include peer on peer abuse through a third party.</i>
County Lines	<i>Young people are at risk of exploitation from county lines gangs who use vulnerable young people and adults at risk to support illegal drug dealing from one area of the country to another. Children and young people are often recruited to move drugs and/or money from one</i>

	<p><i>location to another under fear or reprisal if they attempt to leave the gang.</i></p> <p><i>Periods of being missing from education and home could be a sign of a child or young person being trafficked through county lines.</i></p> <p><i>Adults at risk may be exploited by county lines gang through ‘cuckooing’. This is where gangs will take advantage of an adult who resides in their own property in order to set up a base from which to deal drugs or hold members of the county lines gangs as there are moving their drugs from one area to another.</i></p>
Female Genital Mutilation (FGM)	<i>Female Genital Mutilation is the partial or total removal of external female genitalia for non-medical reasons. There is a legal duty to report to the police all cases of FGM carried out on a girl under the age of 18</i>
Bullying and cyber bullying	<i>Bullying can happen anywhere – at school, at home or online (cyberbullying). It’s usually repeated over a long period of time and can hurt a child both physically and emotionally.</i>
Child trafficking	<i>Child trafficking is a type of abuse where children are recruited, moved or transported and then exploited, forced to work or sold.</i>
Grooming	<i>Children and young people can be groomed online or in the real world, by a stranger or by someone they know - a family member, friend or professional. This can be for sexual purposes or with the intent of radicalising the young person.</i>
Harmful sexual behaviour	<i>Harmful sexual behaviour includes using sexually explicit words and phrases, inappropriate touching, using sexual violence or threats, full penetrative sex with other children or adults. Children and young people who develop harmful sexual behaviour harm themselves and 12 others. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Harmful sexual behaviour can occur both in person and online.</i>
Sexual Violence	<i>According to the Sexual Offences Act 2003, sexual violence is classed as rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent.</i>
Sexual Harassment	<i>Sexual harassment is defined as unwanted conduct of a sexual nature either online or offline. This may include telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names, sexual “jokes” or taunting, physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes and displaying pictures, photos or drawings of a sexual nature. Online sexual harassment can form part of a wider pattern of sexual harassment or violence or can be standalone. It may include: consensual or non-consensual sharing of nude or semi-nude images and videos, sharing of unwanted explicit</i>

	<i>content; upskirting (a criminal offence); sexualised online bullying; unwanted sexual comments and messages, including, on social media; sexual exploitation; coercion and threats.</i>
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Please use the links on page 4 of this policy to obtain more information on each of the identified safeguarding areas named above. For further information on the types of abuse and indicators of abuse, please follow the following link <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

6. Specific Safeguarding Issues

Sexual violence and sexual harassment between people in schools and Project Challenge

Children, young people and adults of all sexes and all ages are at risk of sexual violence and sexual harassment in school and Project Challenge settings. This can be perpetrated by one individual or a group of individuals who may be the same age as the victim. Sexual violence and sexual harassment can take place in person or via digital means using mobile phones or computer devices. It is important that all colleagues recognise that sexual activity where one person is not a willing participant is abuse. This applies to sexualised comments and gestures as well as physical activity. Sexual violence and sexual harassment exist on a continuum and may overlap but are never acceptable. Sexual harassment is defined as 'unwanted conduct of a sexual nature' experienced in person or via digital means.

ALL Project Challenge staff are responsible for:

- challenging inappropriate behaviours that they are witness to in any Project Challenge location. This includes in common spaces and in the outdoor areas.
- making clear to students that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- promoting a culture where sexual violence or sexual harassment are not dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Project Challenge consider all acts of sexual violence and/or sexual harassment as a breach of the Student Disciplinary Policy. Any student reported for being a perpetrator of this activity will be subject to investigation and a disciplinary hearing at Stage 4, gross misconduct.

All staff have a duty to take reports of sexual violence or sexual harassment seriously and must not dismiss them. Staff have a duty to report to the DSL if a student discloses sexual violence or sexual harassment.

Students can self-report incidents of sexual violence or sexual harassment to the DSL. All Project Challenge staff will undertake training on how to recognise, respond to and report sexual violence and sexual harassment.

7. Early Help Assessment

Early help may benefit an individual in a particular set of circumstances by giving them access to support services across multiple agencies. All staff should be particularly mindful of the support needs of a student who:

- is disabled or has certain health conditions and has specific additional needs; • has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

Please report to the DSL if you have any concerns about a student.

8. Designated Safeguarding Team

Role	Name and Contact
Business Manager; Designated Safeguarding Lead	Lorna Butterick lorna.butterick@projectchallenge.org.uk 01422 363644
Pastoral Manager, Deputy Safeguarding Lead	Stacey Wood Stacey.wood@projectchallenge.org.uk 01422 363644

Please note that all Project Challenge staff can support with Safeguarding queries. The Safeguarding Team will deal with your report swiftly. All Project Challenge staff are trained in Safeguarding. Students, parents and carers are able to contact the Safeguarding Team directly by calling on 01422 363644.

9. The Safeguarding Policy in Action

The following information provides guidance on how to how to report a safeguarding concern.

All staff MUST complete training on safeguarding. All staff must be able to recognise the indicators of abuse and should ensure that they have read the descriptions of different types of abuse in section five of this report. Further support on how to recognise the signs of abuse can be found by following this link [Stat guidance template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk).

All staff are reminded that if they have any concerns, they can talk to a member of the Safeguarding Team for further support and guidance and that they must act IMMEDIATELY.

In order to quickly and effectively action safeguarding concerns, staff must follow the reporting process identified in appendix one of this policy. The DSLs must log all safeguarding concerns via the Safeguarding Disclosure Form (Appendix 2) on the same day the concern has been raised.

Allegations against a member of staff.

If staff have safeguarding concerns of any kind, or an allegation is made about another member of staff (including paid members of staff, volunteers, supply teachers and contractors) posing a risk of harm to children or young people, then:

- This should be referred to the DSL.
- Where there are concerns/allegations about the DSL, this should be referred to the DSL Trustee.

Project Challenge recognises the welfare of a child, young person or adult at risk is the main concern. Allegations must be dealt with swiftly and thoroughly. It also recognises that allegations may cause stress and must proceed with sensitivity and welfare support for the subject of the investigation.

Where a disclosure has been received/discussed, the first course of action should be to assess the risk to the child, young person or adult at risk to determine if immediate intervention is required according to the Harms Test [Making barring referrals to the DBS - GOV.UK \(www.gov.uk\)](https://www.gov.uk). In all cases guidance will be sought from the Local Area District Officer (LADO) [Safeguarding Calderdale – Safeguarding children and adults in Calderdale](#).

Cases that meet the harms threshold will be determined by the following. The accused has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes transferable risk for actions that may have taken place outside of Project Challenge.

An Investigating Officer will be appointed to conduct a thorough investigation into the allegations. The outcome will be one of the following:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

In all cases, the DSL will work with the LADO to record the outcome. Project Challenge has a legal duty to complete a DBS referral in ALL cases where a member of staff is dismissed (or would have been dismissed had they not resigned) for causing harm or engaging in conduct that is likely to cause harm to a child.

In all cases, investigations into allegations against a member of staff will be concluded and actions taken. The investigation and reporting of outcomes will continue if the subject of the investigation ceases their contract of employment with Project Challenge.

Allegations that do not meet the harms threshold will be investigated dealt with through the Staff Disciplinary Policy as unprofessional behaviour where appropriate.

In all cases, records of allegations against members of staff will be recorded and reviewed as part of the Board meetings conducted by the Safeguarding Link Trustee.

Specific actions if abuse is suspected by a member of the Safeguarding Team

The Operations Manager will request that an initial assessment is conducted by the Safeguarding Trustee. The first course of action should be to assess the risk to the child using the Harms Test to determine if immediate intervention is required. In all cases guidance will be sought from the Local Area District Officer (LADO).

Specific action if staff have concerns about Safeguarding Practices within Project Challenge

Staff should feel able to raise concerns about poor or unsafe practice or potential failures in the application of this policy. Project Challenge Senior Leadership Team take all such concerns seriously and will take action as necessary. *Project Challenge Whistleblowing Policy and should be followed to raise any concerns.*

10. Information Sharing

It is vital to recognise that the Project Challenge will share information with relevant safeguarding partners in order to support a child or adult at risk. Information sharing is vital in identifying and tackling all forms of abuse and neglect. Project Challenge, will be proactive in sharing information with local agencies as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children and adults

at risk. Project Challenge recognises the legal obligations as defined by the Data Protection Act 2018 and GDPR and will ensure that personal information is processed fairly and lawfully and stored securely. It is also important to recognise that the Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of safeguarding children and individuals at risk. Where a student in receipt of Safeguarding support leaves Project Challenge to join a new education provider, the Safeguarding Team will ensure that the safeguarding file is transferred within five days for in year transfers and within the first five days of a new term for progressing students.

11 Reasonable Force and Contact with Students

Use of reasonable force

It is accepted that there may be occasions where the use of reasonable force is required to safeguard the students of Project Challenge. The use of the term 'reasonable force' includes a broad range of actions that involve physical contact with a student in order to safeguard the student or other students and explicitly means 'using no more force than is needed'. Reasonable force may be used when a student is in danger or needs to be prevented from causing harm to others.

Staff may not use reasonable force where it is not considered an emergency to prevent harm. Physical restraint may only be used as a last resort and this includes removing a person's freedom to leave an area, room or location. Reasonable force may include guiding a student to safety or in extreme cases, breaking up a fight. Project Challenge staff retain the right to conduct searches of students for items that may cause harm to others, including the use of a Security Scanner (wand), force cannot be used to conduct searches of students.

Contact with students

Although Project Challenge does not operate a no-contact policy, staff must recognise that contact with students should not be used as a way to relate to them or convey a particular style of teaching. Some staff are likely to come into physical contact with learners in the course of their duties. Staff should be aware of the limits within which such contact should properly take place and of the possibility of such contact being misinterpreted. Staff should clearly communicate the purpose of contact when it does take place and should not use contact casually. This is because well-intentioned gestures can be misinterpreted if the circumstances of the student are unknown.

12. Parental Involvement

Project Challenge recognises that the welfare of a child is the main concern. It also considers it good practice to involve parents/guardians in the reporting of safeguarding cases but acknowledges it is essential to proceed with caution.

The needs of the student and the protection of evidence should be considered before involving parents/guardians. In some circumstances, it will be beneficial to consult with an External Support Agency prior to making the decision whether or not to share information.

Project Challenge may receive a request from an External Support Agency to interview a student on Project Challenge premises. Parents/guardians should be given adequate opportunity to attend unless their involvement is considered detrimental to the interview. The Safeguarding Team should satisfy themselves that parents/guardians are given sufficient notice of these interviews and the opportunity to attend. If parents/guardians are not invited or are unable to attend, the Safeguarding Team will ensure an appropriate adult is present throughout the interview.

13. Referral to External Support Agencies

All cases are assessed under the continuum of need recommended by the CSCP & CSAB. Referrals to external support agencies will be made where the assessment shows this is required. Referrals will be made by a member of the Safeguarding Team.

All referrals should be made within 24 hours of disclosure. Initially this is done by telephone and then followed up in writing using the most appropriate referral form.

The referral form will include the following:

- Details of the person
- Circumstances of suspected or actual abuse
- Issues about the disclosure
- Names of witnesses
- Designated officer's observations
- Actions taken or to be taken
- Names of people consulted

14. Designated Safeguarding Lead (DSL) Supervision

Keeping Children Safe in Education (2022) stipulates that the DSL has access to specialist advice and where necessary supervision. Project Challenge has determined that the Local Authority Designated Officer will support and where necessary support the DSL.

The designated Safeguarding Trustee provides internal support and supervision for the DSL.

15. Online Safety

The Safeguarding Team are responsible for the regular review of activity and will employ the safeguarding procedures to intervene when students or staff are identified as searching for inappropriate terms.

Teaching staff have a duty to deliver training in online safety at the start of each programme of study and to refresh this throughout the year for all students of all ages and modes of study. This training should be relevant to the student group, how they access the internet and the particular risks that they might face. It should cover but not be limited to:

- Online content that may cause harm. EG, pornography, fake news, racism, radicalisation, self-harm, misogyny.
- Online **contact** that may cause harm. EG, sexual exploitation, financial exploitation, extortion, adults posing as children.
- **Conduct** online that may cause harm. EG, making, sending and receiving nude images (either consensual or non-consensual), online bullying.
- **Commerce** online that may cause harm. EG, scams, phishing, gambling. Tutors and support staff should always reinforce positive online safety for students of all ages and should regularly review the risks posed to students as a result of their online activity.

16. Prevent

The Project Challenge Prevent Policy is contained in the Learner Agreement.

Prevent is part of the overall Government counter-terrorism strategy (CONTEST) with the aim of reducing the threat to the UK by safeguarding and supporting those vulnerable to radicalisation. The strategy has three objectives, detailed below.

- Safeguard and support those most at risk of radicalisation through early intervention and offering support.
- Tackle the causes of radicalisation and respond to the ideological challenge of terrorism.
- Enable those who have already engaged in terrorism to disengage and rehabilitate.

Project Challenge is required to undertake the following as part of the Prevent Duty Guidance:

- implement Prevent strategy in a proportionate and risk-based way
- ensure active engagement by Trustees, managers, staff and external partners including the police
- engage and consult students on plans for implementing the duty
- carry out a risk assessment which assess where and how students or staff may be at risk from being drawn into terrorism
- implement staff training so staff have an understanding of the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas.
- have procedures for sharing information about vulnerable individuals
- ensure the Staff and Student IT and Social Networking Policy references Prevent and the Project Challenge has measures to monitor and report use of the internet.

Reporting of concerns relating to suspected radicalisation and extremism, should be undertaken in the same way as a safeguarding concern by reporting to the DSL who will complete the Safeguarding Disclosure Form.

All colleagues have a duty to recognise the signs of radicalisation and report concerns to the Safeguarding Team.

Signs of radicalisation:

- Being influenced or controlled by a group
- An obsessive or angry desire for change or 'something to be done'
- Spending an increasing amount of time online and sharing extreme views on social media.
- Personal crisis
- Need for identity, meaning and belonging
- Mental health issues
- Looking to blame others
- Desire for status, need to dominate

The Safeguarding Team have a duty to conduct an intervention with the individual at risk of radicalisation, and where it is deemed appropriate, they will be referred to the West Yorkshire Police Prevent officers.

Opportunities to Teach Safeguarding

All students enrolled on courses at Project Challenge access PHSE session designed to prepare students for work and life in modern Britain through engaging and open debates that tackle real work issues such as radicalisation, misogyny, racism, homophobia and sexual violence. Project Challenge is committed to delivering a rounded curriculum that includes all aspects of safeguarding.

RUN, HIDE, TELL. As part of the UK Government's ACT programme, all staff and students will be trained on how to react in the event of a firearms or weapons attack at the Project Challenge. This will follow the RUN, HIDE, TELL training that is initiated in the event of a Project Challenge lockdown.

17. External Speakers

Project Challenge has a duty to protect the welfare of staff and students and are required to consider the potential threat of all external speakers invited into the Project Challenge.

18. Criminal Convictions

In accordance with Project Challenge's safeguarding requirements, all students/prospective students are asked to disclose any unspent criminal convictions on their enrolment form; enrolled students who receive a criminal conviction whilst on a programme of study at Project Challenge must notify a staff member. Applicants are required to declare all convictions (including warnings, cautions, reprimands) which are 'spent' and 'un-spent' due to certain professions being exempt from the Rehabilitation of Offenders Act 1974.

Please note that declaring a criminal conviction does not automatically prevent anyone from becoming or continuing as a student at Project Challenge and we offer appropriate support when necessary.

For new students, the disclose box for criminal convictions must be ticked on the enrolment form at Project Challenge.

For existing students, they must declare immediately upon receiving their criminal conviction. The student/ prospective student will be asked to complete the 'Declaration of Criminal Convictions' form.

The disclosed convictions will then be assessed in accordance with Project Challenge procedures and the student/ prospective student will be informed of the outcome of the assessment within a maximum of TWO weeks of the Safeguarding Team receiving the completed form.

Project Challenge reserves the right to refuse a place to an applicant if they are assessed as a high risk to others or if Project Challenge is unable to meet their specific requirements and ensure a safe or controlled environment for Project Challenge community.

Project Challenge will also undertake such risk assessments after a student has enrolled if information is received at any time which suggests that they may present a risk or may be unable to be properly supported. Confidentiality is of paramount importance; all procedures take account of Data Protection legislation and Project Challenge Data Protection Policy, and all information relating to an applicant's disclosure is kept within the Safeguarding Team.

19. Monitoring This policy will be reviewed on an annual basis.

Appendix One: Procedure for responding to a safeguarding issue.

This procedure applies to all scenarios.

What to do if a student discloses to you.

1. Listen carefully to the student, without judgement.
2. Do not ask leading questions; establish the key points that the student is communicating.
3. Stay calm and do not show your emotions.
4. Reassure the student that you are taking their disclosure seriously but do not promise to keep the information confidential, you will need to share the information with a member of the Safeguarding Team.
5. Take note of the key facts (dispose of confidentially afterwards).
6. Confirm that you are taking the issue seriously and that your next steps will be to speak to the Safeguarding Team.
7. If the disclosure relates to a member of Project Challenge staff, report the matter to the DSL or Deputy.

- With ALL disclosures, the Safeguarding Disclosure Form must be completed on the same day the disclosure was made.
- In situations where you have concerns about the welfare or safety of a student, but they have not disclosed anything to you, report to the DSL and both complete the Safeguarding Disclosure Form. Do not attempt to investigate the matter yourself.
- **Remember**, you must not discuss the disclosure with your colleagues but you can talk to the DSL or your Line Manager if you are affected by hearing the disclosure.
- In an urgent situation, take the student directly to the DSL and ask to speak to a member of the Safeguarding Team.

The Safeguarding Team Safeguarding Emergency Contact Number: 07929 837934

Project Challenge- Appendix 2

SAFEGUARDING RECORD OF DISCLOSURE

Who is making this disclosure: Learner / Parent / Member of Staff / Visitor		
Name:	Date of Birth: (if under 18)	
Address:		
Post Code:	Telephone	
Nature and Circumstances of Suspected or Actual Abuse.		
Date:	Time:	Place:
Details		
Names and titles of those believed to be involved:		
What the Learner / Child / Parent / Staff / Visitor said:		
Names of witnesses:		
Your own observations:		
Any actions you have decided to take:		
Staff Name:	Signature:	

Name others consulted:

Original to be retained in the Safeguarding File.

Appendix Three: Project Challenge Declaration of Criminal Convictions

The term safeguarding refers to the broader planning and procedures that are in place to protect all students, staff and visitors to Project Challenge. Safeguarding is a core element of all Project Challenge activity, the key aspects being the protection of children, adults at risk and the safe recruitment of staff. Project Challenge encourages all members of the community to enrol on their chosen Project Challenge course and is able to provide support to applicants who have unspent criminal convictions. Students in this position are asked to complete this form to provide the appropriate support to ensure they achieve their full potential. Please read the following and answer all the questions on this form and do not withhold any information, except as provided under the Rehabilitation of Offenders Act 1974. Confidential help in completing this form is available from Student Services. The Rehabilitation of Offenders Act 1974 is intended to prevent discrimination against ex-offenders who are judged to have put their criminal past behind them. The Act allows some criminal convictions to become spent after a certain period of time.

Please complete the sections below and return this form to Student Services as soon as possible.

Full Name:

Have you ever been convicted by a Court Martial or sentenced to detention or dismissal whilst serving in the Armed Forces of the UK or any Commonwealth or foreign country? You need not declare convictions, which are "spent under the Rehabilitation of Offenders Act (1974).
Yes No

Have you ever been convicted or found guilty by a Court of any offence in any country (excluding parking but including all motoring offences even where a spot fine has been administered by the police) or have you ever been put on probation (probation orders are now called community rehabilitation orders) or absolutely/conditionally discharged or bound over after being charged with any offence or is there any action pending against you? You need not declare convictions, which are "spent" under the Rehabilitation of Offenders Act (1974).
Yes No

Please list all unspent criminal convictions:

Conviction	Date	Sentence	Court

Please use this space to give any information that you feel relevant:

	Yes	NO
Do you have a probation officer?		
Do you have any current bail conditions?		
Are you on the sex offenders register?		
Have you ever been refused work with children or vulnerable adults?		
Are you subject to a SOPO?		

I certify that the information that I have declared on this form is correct and I understand that the information provided will assist with supporting my attendance at Project Challenge.

If necessary I give Project Challenge my consent to contact external agencies to confirm the information that I have given. If you are subject to any on-going criminal investigation or charged with an offence after you have returned this form, please contact the Project Challenge Safeguarding coordinator straight away.

Signature:.....

Date:.....