



SAFEGUARDING CHILDREN **AND YOUNG PEOPLE** **POLICY**

2026

Draft for Board of Trustees approval

Previous policy reviewed: 1 March 2025

Review date: September 2027, or sooner if guidance, legislation or circumstances change

SAFEGUARDING CHILDREN AND YOUNG PEOPLE POLICY

POLICY STATEMENT

Living On Bereavement Service recognises that all children and young people have the right to be safe from abuse, neglect and exploitation. Living On takes seriously its responsibility to safeguard and promote the welfare of children and young people who use, visit or come into contact with the service.

Living On will:

- respond promptly and appropriately to safeguarding concerns, allegations and disclosures;
- listen to children and young people and take their wishes, feelings, safety and wellbeing seriously;
- maintain effective links with statutory safeguarding agencies and partner organisations;
- promote child-centred, inclusive and anti-discriminatory practice;
- ensure staff, trustees, volunteers, sessional workers, students and others working on behalf of Living On understand their safeguarding responsibilities; and
- support a culture in which concerns can be raised, recorded, challenged and escalated without fear.

Safeguarding is everybody's responsibility.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network⁴ through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

CORE SAFEGUARDING PRINCIPLES

- It could happen here. Bereavement provides important context, but it must not become an explanation for every change in a child or young person.
- Act on concerns - do not wait for certainty or for a disclosure.
- Listen; do not investigate. Staff and volunteers should notice, listen, record and report rather than attempt to prove whether abuse has occurred.
- Do not promise confidentiality where a child or somebody else may be at risk. Explain that information may need to be shared to help keep them or somebody else safe.
- Share safeguarding information appropriately and without unnecessary delay. From 30 September 2026, where the statutory information-sharing duty under section 16LA of the Children Act 2004 applies, relevant information must be shared where the statutory conditions are met. Consent is not required for sharing under this duty.

- Record safeguarding decisions and the reasons for them.
- Can you defend your decision? A safeguarding decision should be explainable by reference to what was known at the time, what was considered, what action was taken and why.
- If an immediate risk to life or safety exists, call 999.

PURPOSE, SCOPE AND GUIDANCE

This policy applies to trustees, managers, paid staff, volunteers, sessional workers, agency workers, students and anyone acting on behalf of Living On. It applies wherever Living On activity takes place, including one-to-one work, schools, groups, Family Help Point, family social events, home visits, office meetings, telephone or online contact, buddying and informal contact arising through Living On.

Living On's child safeguarding arrangements are informed by Working Together to Safeguard Children 2026. Keeping Children Safe in Education 2026 (KCSIE) is statutory guidance for schools and colleges; when Living On staff or volunteers work in a school or college, they must follow that setting's safeguarding and child protection procedures as well as Living On's reporting and recording arrangements.

Living On recognises that some children may face additional barriers to being heard or protected, including disabled children and children with SEND, children experiencing discrimination, young carers, children affected by domestic abuse or parental difficulties, and children whose communication needs make disclosure more difficult.

SAFEGUARDING ROLES AND CONTACTS

Role	Living On contact
Designated Safeguarding Lead (DSL)	Clare Kemp - 07759 697223
Deputy Designated Safeguarding Lead (DDSL)	Jackie Vaughan - 07599 610031
Designated Safeguarding Lead (DSL) from October 2026	Heather Williams - Heather@livingon.org.uk - 07946 038168
Office	01689 831720

The Board of Trustees is responsible for approving safeguarding policy and protocols and - they have oversight when/if any allegation or concerns are related to staff or volunteers.

The DSL leads on safeguarding practice, advice, referrals, liaison with statutory agencies, oversight of the Living On Safeguarding Log and escalation. They lead on update training and policy review.

The Family Support Worker (FSW) team is responsible for adding safeguarding concerns to the Safeguarding Log. The DSL reviews and signs off entries, checking that appropriate action, rationale, follow-up and outcomes are recorded.

The DSL will report termly to the Board of Trustees on the number of safeguarding incidents using the Living On Safeguarding Report Sheet for Trustees, together with appropriate themes, learning or actions where relevant, while maintaining confidentiality. Deputies or nominated senior contacts provide cover.

Absence of the DSL must never delay action needed to protect a child.

If a concern relates to the DSL, it must not be reported to the DSL. It should be reported to the appropriate senior manager/trustee in accordance with Living On's allegations and whistleblowing arrangements.

Volunteers and other workers must report concerns promptly and provide an accurate written account when required. They are not responsible for entering or signing off concerns on the Living On Safeguarding Log.

LIVING ON'S CHILD PROTECTION PROCEDURE

Concerns about a child's welfare vary in seriousness and may arise from something the child says, behaviour or presentation, family interactions, information from another person, online contact, or a

practitioner's professional concern. A child may not recognise an experience as harmful or may not be ready or able to disclose it.

1. If you are concerned, act promptly. Do not wait until you have proof.
2. Listen calmly. Allow the child to speak in their own words. Do not ask leading questions or investigate.
3. Do not promise secrecy. Explain that you may need to tell somebody whose job is to help keep them safe.
4. Ask for help. Report the concern without delay to the appropriate safeguarding person. If you are in a school, follow the school's procedure and report to its DSL/DDSL and they will follow the schools procedure for safeguarding children. In other Living On settings, report to the Living On DSL/deputy.
5. Record your concerns as soon as possible. If you are in a school this may take the form of a hand written note or an email. Complete your notes within 24 hours as these will be required if a referral is made.
6. Record what you saw or heard, the child's words where relevant, dates/times, who was present, what action you took, who you told, decisions made, reasons for decisions and known outcomes.
7. Your line manager/FSW/Safeguarding lead will agree the next steps. Next steps might involve making an early help referral via Bromley children and Families hub or making a referral directly to children's social care/the police. We would always want to work in partnership with the young person and the family and where ever possible we would share with them our concerns and when we refer to social services. Working openly with families does not mean that consent must always be obtained before safeguarding information is shared. Where the statutory information-sharing duty applies, consent is not required. Staff should explain what information will be shared and why where it is safe and appropriate to do so, but safeguarding action must not be delayed because consent has not been obtained or because a family does not agree to the information being shared. A family's choice about whether to accept support offered is separate from the duty to share relevant safeguarding information.
8. If you have concerns about the safety or welfare of a child and feel they are not being acted upon by your line manager/FSW or named/designated safeguarding lead or the school, it is your responsibility to take action. If you feel that we have not responded appropriately to your concerns it is open to you to contact the child protection agencies direct. You can also seek advice at any time from the **NSPCC helpline – help@nspcc.org.uk or 0808 800 5000.**
9. If a child is in immediate danger or there is an emergency, call 999.

WORKING IN SCHOOLS - 'DO NOT LEAVE WITH IT'

Main rule: do not leave the school with an unreported safeguarding concern.

Living On staff and volunteers working in a school are working within the school's safeguarding framework.

- Report any safeguarding concern before leaving the school, wherever practicable, using the school's safeguarding procedure.
- Report to the school's DSL or DDSL. If they are unavailable, follow the school's procedure for ensuring the concern reaches an appropriate safeguarding person; an unavailable DSL must not delay necessary action.
- Inform the Living On office/FSW team or DSL without delay so the concern can be added to the Living On Safeguarding Log and reviewed by the DSL.
- Provide any required Living On written account promptly while information is fresh. A routine case-note timescale must never delay safeguarding reporting.
- Follow up and escalate if you remain concerned that appropriate action has not been taken.

Living On does not investigate a school's safeguarding concern on the school's behalf. Our role is to recognise, respond, record, report and, where necessary, challenge or escalate.

RECOGNISING ABUSE, NEGLECT AND EXPLOITATION

Abuse, neglect and exploitation can occur within or outside the home, in institutions or community settings, between children, within intimate relationships and online. Different forms of harm often overlap. Staff and volunteers should maintain professional curiosity and should speak to the DSL if unsure.

- Physical abuse - deliberately causing physical harm or failing to prevent it.
- Emotional abuse - persistent emotional maltreatment, including humiliation, rejection, intimidation, persistent criticism or exposure to harmful experiences.
- Sexual abuse - contact or non-contact sexual activity involving a child, including online abuse, sexual images, grooming and abuse by other children.
- Neglect - persistent failure to meet a child's basic physical or psychological needs in a way likely to impair health or development.
- Child-on-child abuse - including bullying, discriminatory abuse, sexual violence or harassment, harmful sexual behaviour, abuse within teenage relationships and online abuse.
- Domestic abuse and coercive control - children can be victims in their own right through seeing, hearing or experiencing the effects of domestic abuse or through abusive intimate relationships.
- Exploitation and extra-familial harm - including criminal exploitation, sexual exploitation, county lines, financial exploitation, serious violence and group-based exploitation.
- Online harms - including grooming, coercion, sexual abuse, harmful content, cyberbullying and technology-facilitated abuse.
- Honour, faith or belief-based abuse, forced marriage and female genital mutilation.
- Prejudice-based and discriminatory harm, including racism and faith-targeted abuse.

Indicators do not prove abuse. Equally, the absence of a disclosure does not mean there is no safeguarding concern. Changes in behaviour, mood, attendance, presentation, relationships or online activity may warrant curiosity and discussion.

BEREAVEMENT, MENTAL HEALTH AND SAFEGUARDING

Living On works with children and families experiencing grief. Grief can affect mood, behaviour, sleep, concentration, relationships and emotional regulation. These changes must be understood in context, but bereavement must not be used to explain away possible safeguarding indicators.

Mental health difficulties can be associated with, or be an indicator of, abuse, neglect or exploitation. Staff and volunteers do not diagnose mental health conditions. Concerns about self-harm, suicidal thoughts, significant deterioration or immediate safety must be reported and responded to in line with safeguarding and emergency procedures.

FAMILY HELP AND WORKING WITH OTHER AGENCIES

Children and families should receive the right help at the right time. Working Together to Safeguard Children 2026 uses Family Help to describe a more joined-up approach incorporating targeted early help and support under section 17 of the Children Act 1989. Living On may contribute information, support or professional knowledge where appropriate, but statutory thresholds and decisions sit with the relevant agencies.

Where a child lives outside Bromley, referrals should be made to the local authority responsible for the child's area. Where a child is known to a school or another statutory service, information should be shared through the appropriate safeguarding route.

BROMLEY CHILD SAFEGUARDING CONTACTS

- Bromley Children and Families Hub: 020 8461 7373 / 7379 (Monday-Friday, 8:30am-5:00pm).
- Out of hours/weekends/public holidays: 0300 303 8671.
- Email: candfhub@bromley.gov.uk.
- Referrals should be made through the Children and Families Hub portal where appropriate.
- Immediate danger: 999.

Contact details should be checked at each annual policy review because local arrangements may change.

INFORMATION SHARING AND CONFIDENTIALITY

From 30 September 2026, where the statutory information-sharing duty under section 16LA of the Children Act 2004 applies, relevant safeguarding information **must be shared** where the conditions of the duty are met.

Consent is not required to share information under this duty. Where safe and appropriate, children and families should be told what information is being shared and why.

Information should only be withheld under the duty where sharing would be more detrimental to the child than not sharing.

Data protection and confidentiality do not prevent lawful safeguarding information sharing.

If unsure, seek advice from the DSL; uncertainty must not cause unnecessary delay.

Record what was shared, with whom, when and why, including the rationale for sharing or not sharing.

Living On's Privacy and Data Protection Policy should be read alongside this policy.

RECORD KEEPING - 'CAN YOU DEFEND YOUR DECISION?'

The Living On Safeguarding Log is the organisation's formal record of safeguarding concerns. The FSW team enters concerns onto the log and the DSL reviews and signs them off. Safeguarding records must be factual, timely, secure and sufficiently clear for another safeguarding professional to understand what happened and why decisions were made.

- Record the date, time and context of the concern.
- Separate fact, observation, the person's own words and professional opinion.
- Record action taken, advice sought, information shared and with whom.
- Record decisions made, the reasons for those decisions and any known outcome.
- Correct errors transparently; do not rewrite a record to make it look more certain than it was at the time.
- Store safeguarding information securely and restrict access to those who need to know.

Safeguarding test: CAN YOU DEFEND YOUR DECISION? A decision does not have to be judged with hindsight as perfect, but staff and volunteers must be able to explain what they knew, what they considered, what they did and why. If in doubt, seek advice and record that you did so.

SAFEGUARDING CONCERNS ABOUT ADULTS

Living On works with children and young people in the context of their families and may therefore become concerned about the safety or wellbeing of a parent, carer or other adult. Staff and volunteers should be alert to possible abuse, neglect, domestic abuse, coercive control, financial abuse, exploitation or self-neglect.

If a staff member or volunteer has a safeguarding concern about an adult, they should not investigate or decide whether the concern meets the statutory threshold for adult safeguarding. They should report the concern promptly to the Living On FSW team/DSL, who will consider appropriate action and whether advice or referral to Adult Social Care or another agency is required.

Where children are part of the household, consideration must also be given to whether the circumstances create a safeguarding concern for a child. If there is an immediate risk of serious harm, call 999.

SAFEGUARDING ACROSS LIVING ON SETTINGS

Setting	Safeguarding considerations
One-to-one / therapeutic support	Disclosures, privacy, professional boundaries, physical contact, emotional dependency, recording and lone-working arrangements.
Schools	School safeguarding policy, DSL/DDSL, immediate reporting, school's recording system, Living On notification and escalation.

Family Help Point / groups	Confidentiality in shared spaces, overheard disclosures, supervision, child-on-child concerns, boundaries and safe management of activities.
Family social events	Supervision, lost children, photography, physical contact, adult/child boundaries, concerning behaviour and safe handover.
Home visits / buddying	Lone working, other people present, family dynamics, domestic abuse, environmental risks, boundaries and the volunteer's own safety.
Office meetings	Privacy, access to records, visitors, children accompanying adults and safe one-to-one arrangements.
Telephone / online contact	Approved communication channels, confidentiality, records, boundaries, private messaging, online disclosures and escalation.
Informal contact	A concern remains a safeguarding concern even if it arises outside a planned session or activity.

PROFESSIONAL BOUNDARIES AND SAFER WORKING

- Use Living On-approved communication methods and follow organisational guidance on personal phones, messaging and social media.
- Do not create secret or exclusive relationships with children, young people or vulnerable adults.
- Maintain appropriate physical and emotional boundaries, including around gifts, transport, photographs and contact outside agreed work.
- Follow lone-working and home-visit procedures and leave a situation if personal safety is at risk, while ensuring urgent safeguarding concerns are reported.
- Seek supervision or safeguarding advice when a relationship, request or situation feels uncomfortable or unclear.
- Report boundary concerns about yourself or another worker early; small concerns can be important.

CONCERNS OR ALLEGATIONS ABOUT STAFF, VOLUNTEERS OR OTHER ADULTS WORKING WITH CHILDREN

Any concern about the conduct of a staff member, volunteer, trustee, contractor, student or other adult working with children must be taken seriously, including concerns that appear low-level or do not clearly meet the harm threshold.

- Do not investigate the allegation yourself or confront the person who is the subject of the concern.
- Report the concern immediately through Living On's designated allegations procedure.
- If the concern is about the DSL, report it to the appropriate senior manager/trustee rather than to the DSL.
- Where the concern may meet the relevant harm threshold, Living On will seek advice from the Local Authority Designated Officer (LADO) and follow local procedures.
- Concerns about conduct that do not meet the LADO threshold should still be recorded and managed under Living On's low-level concerns, conduct, disciplinary or volunteer procedures as appropriate.
- The welfare of the child is paramount, while the person who is the subject of an allegation must also be treated fairly and confidentially.

Current Bromley LADO contact details must be checked against Bromley safeguarding arrangements before this policy is ratified and whenever an allegation requires consultation.

WHISTLEBLOWING AND ESCALATION

Living On expects staff and volunteers to challenge safeguarding practice when they believe a concern has not been dealt with appropriately. No person should assume that somebody else will act.

- Raise the concern with the DSL/deputy or appropriate manager/trustee.

- If the concern relates to those people, use the alternative route in Living On's whistleblowing procedure as detailed in your handbook.
- If internal escalation is not safe or effective, concerns may be raised with the relevant statutory safeguarding agency or police.
- When working in a school, use the school's escalation/whistleblowing procedure as appropriate and keep Living On informed.

SAFER RECRUITMENT, DBS AND SUITABILITY

Living On will use proportionate safer recruitment and vetting arrangements for roles involving children and young people, including identity and reference checks, role assessment, appropriate Disclosure and Barring Service checks and ongoing attention to suitability.

When Living On volunteers work regularly in schools, Living On and the school must ensure the role and frequency of activity are correctly assessed against current regulated activity and DBS requirements. Safeguarding checks do not replace supervision, professional boundaries or a culture in which concerns are reported.

TRAINING, SUPERVISION AND SUPPORT

Living On will provide safeguarding training at induction and regular updates appropriate to role and setting. Staff and volunteers working in schools are expected to read KCSIE 2026 Part One and follow the school's safeguarding procedures. If you are unable to attend training and updates, you will not be able to work with children and young people in their homes or in schools until you are up to date.

Safeguarding learning should include recognising abuse, neglect and exploitation; responding to disclosures; child-on-child abuse; domestic abuse; online and extra-familial harm; information sharing, including the statutory information-sharing duty and the distinction between informing families and seeking consent; recording; adult safeguarding; professional boundaries; concerns about colleagues; and escalation.

Living On recognises that safeguarding situations can be distressing. Staff and volunteers will be offered appropriate supervision and an opportunity to discuss the impact of safeguarding work, while maintaining confidentiality. It is mandatory to attend supervision when working with a child or young person.

MONITORING, REVIEW AND GOVERNANCE

The Board of Trustees will approve this policy and oversee safeguarding protocols. The policy will be reviewed at least annually and sooner where there are significant changes to legislation, statutory guidance, local safeguarding arrangements, Living On's services, learning from an incident, or identified gaps in practice.

The DSL will review the Safeguarding Log for outstanding actions, repeated concerns, patterns and learning. Termly, the DSL will complete the Living On Safeguarding Report Sheet for Trustees and report the number of safeguarding incidents to the Board, together with relevant themes, risks, learning and actions where appropriate. Reports to trustees must preserve the confidentiality of children and families.

LEGAL AND PRACTICE FRAMEWORK

This policy should be read alongside Living On's related policies and procedures, including safer recruitment/DBS, data protection and privacy, complaints, whistleblowing, lone working, professional boundaries/code of conduct and any online communication or social media procedures.

- Children Act 1989 and Children Act 2004, section 16LA – Information Sharing Duty (from 30th September 2026)
- Children and Social Work Act 2017
- Children's Wellbeing and Schools Act 2026
- Care Act 2014
- Domestic Abuse Act 2021

- Data Protection Act 2018 and UK GDPR
- Equality Act 2010
- Human Rights Act 1998
- Information Sharing Duty: Statutory Guidance for Safeguarding Organisations and their Practitioners (September 2026)
- Sexual Offences Act 2003
- Protection of Freedoms Act 2012
- Working Together to Safeguard Children 2026
- Keeping Children Safe in Education 2026 - relevant when Living On works in schools and colleges
- Current Charity Commission safeguarding guidance
- Current Bromley local safeguarding procedures

POLICY APPROVAL

Policy owner	Designated Safeguarding Lead
Approved by	Board of Trustees
Approval date	_____
Next scheduled review	September 2027
Earlier review	Following significant legal/guidance change, safeguarding incident, service change or identified learning