ARC INITIATIVE

Child Safeguarding Policy and Procedures

Keeping children and young people safe at Arc Initiative

Policy detail	Information
Policy owner	Chidi O'Hanekwu
Designated Safeguarding Lead	Chidi O'Hanekwu, Chief Executive Officer. Safeguarding Level 3 Designated Safeguarding Lead trained, September 2026
Deputy Safeguarding Lead	To be confirmed by the Board. Until a deputy is appointed, concerns are raised with the Chair of Trustees when the Designated Safeguarding Lead is unavailable
Version	2.0
Approved by trustees	01/09/2026
Last reviewed	September 2026
Next review due	September 2027, or sooner if law, guidance or our delivery changes
Applies to	Trustees, employees, sessional facilitators, mentors, volunteers, interns, apprentices, agency workers, consultants and anyone else acting on behalf of Arc Initiative

1. Purpose

Arc Initiative believes that no child or young person should ever experience abuse, neglect or exploitation. We are committed to protecting the welfare of every child and young person who takes part in our work, and to creating an environment where they feel safe, heard and believed.

This policy sets out how we keep children and young people safe. It explains what everyone working with or on behalf of Arc Initiative must do if they are worried about a child or young person, and how we will respond. It applies to work delivered in person, online and in partner settings such as schools, colleges, care homes and community venues.

Who this policy protects

This policy protects anyone under the age of 18 who comes into contact with Arc Initiative, including:

- Young people aged 16 and 17 who take part in our programmes, including Career Compass, Work Ready, Skills for Life, Level Up and Life Leaders mentoring
- Children and young people we meet through schools, colleges, alternative provision and youth settings where we deliver sessions or taster workshops
- Care-experienced children and young people, including those still in placement and those preparing to leave care
- Young people referred to us by leaving care teams, children's social care, youth offending and justice services, health services and community organisations
- Children of adults who use our services, and siblings or family members present at our events

- Children and young people who contact us through our website, social media accounts or online sessions

Young people aged 16 to 25, including care leavers

Most of the young people we work with are aged 16 to 25 across Newham, Tower Hamlets, Waltham Forest and Barking and Dagenham. A young person of 16 or 17 is legally a child and is covered by this policy. From the age of 18 the Safeguarding Adults Policy and Procedures applies.

Reaching 18 changes which policy applies. It does not change the support a young person receives from us, and it does not reduce our duty of care. For care leavers, who hold rights to support from their local authority up to the age of 25, we plan the transition between the two policies with the young person rather than allowing it to happen by default.

2. Our principles

- The welfare of the child is paramount, as set out in the Children Act 1989
- All children and young people have an equal right to protection from harm, whatever their age, race, ethnicity, faith, disability, neurodivergence, gender, gender identity, sexual orientation, immigration status, care status or family circumstances
- Some children are at greater risk because of their experiences, their level of dependency, their communication needs or the discrimination they face. Care-experienced children, young carers, disabled and neurodivergent young people and young people who are not in education, employment or training are among those who may need additional protection
- Racism, faith-based prejudice and other forms of discrimination are safeguarding issues. We name them, record them and respond to them rather than treating them as background noise
- Children can experience more than one kind of harm at the same time. We look at the whole picture rather than the single concern in front of us
- Children and young people have a right to be listened to, to be involved in decisions that affect them, and to be told what is happening and why
- Working in partnership with children, young people, families, carers, referrers and statutory agencies is essential to keeping young people safe
- Safeguarding is everyone's responsibility, not only the responsibility of the Designated Safeguarding Lead

3. Legal and policy framework

This policy is written in line with the law and statutory guidance that protects children in England. Where guidance is updated, we work to the current published version.

Primary legislation

- Children Act 1989 and Children Act 2004
- Children (Leaving Care) Act 2000
- Children and Families Act 2014
- Children and Social Work Act 2017

- Children's Wellbeing and Schools Act 2026, including the extended corporate parenting duties and Staying Close support for care leavers
- United Nations Convention on the Rights of the Child, ratified by the United Kingdom in 1991
- Human Rights Act 1998
- Equality Act 2010
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012
- Female Genital Mutilation Act 2003, as amended by the Serious Crime Act 2015, including the duty to report known cases in girls under 18
- Anti-social Behaviour, Crime and Policing Act 2014, which makes forced marriage a criminal offence
- Modern Slavery Act 2015
- Serious Crime Act 2015, including the offence of controlling or coercive behaviour
- Counter-Terrorism and Security Act 2015
- Domestic Abuse Act 2021, which recognises children as victims of domestic abuse in their own right
- Online Safety Act 2023
- Data Protection Act 2018 and the UK General Data Protection Regulation, as amended by the Data (Use and Access) Act 2025

Statutory guidance and sector guidance

- Working Together to Safeguard Children 2026, which replaced the 2023 edition and strengthens guidance on racism and discrimination, children in care, domestic abuse, multiple and simultaneous harms, and the link between online and offline harm.
- Keeping Children Safe in Education 2026, which applies to the schools and colleges we work alongside and which we follow when delivering in those settings.
- The Government's current information sharing advice for safeguarding practitioners.
- What to do if you are worried a child is being abused.
- Prevent duty guidance, current version.
- Special educational needs and disability code of practice, 0 to 25 years.
- Charity Commission guidance on safeguarding and protecting people for charities and trustees, and its guidance on reporting serious incidents.
- Local multi-agency safeguarding arrangements in each borough where we deliver.

4. Types of abuse and harm

The four categories of abuse used in statutory guidance are physical abuse, emotional abuse, sexual abuse and neglect. A child may experience several at once.

Physical abuse

Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. It also includes a parent or carer fabricating or deliberately inducing illness in a child.

Emotional abuse

Persistent emotional ill treatment that causes severe and lasting harm to a child's emotional development. It can include telling a child they are worthless or inadequate, silencing them or mocking what they say, expectations that do not match their age or development, seeing or hearing the ill treatment of someone else, and serious bullying, including online.

Sexual abuse

Forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It includes contact and non-contact activity, showing children pornography, producing or sharing sexual images of children, grooming, and sexual abuse carried out online. It includes harmful sexual behaviour between children.

Neglect

Persistent failure to meet a child's basic physical or psychological needs. It can include failure to provide food, clothing, shelter, supervision, medical care or emotional warmth, and failure to protect a child from harm or danger.

Other forms of harm we are alert to

- Child sexual exploitation, including exploitation that begins online
- Child criminal exploitation, including county lines, cuckooing and the use of young people to carry drugs, money or weapons
- Serious youth violence and knife crime
- Online harm, including grooming, image-based abuse, sextortion, financial scams and exposure to harmful or extremist content
- Domestic abuse, whether the young person is witnessing it at home or experiencing it in their own relationship
- Female genital mutilation, forced marriage and so-called honour-based abuse
- Radicalisation and extremism
- Modern slavery and trafficking, including forced labour and domestic servitude
- Bullying, including racist, faith-based, homophobic, biphobia, transphobic and disability-related bullying
- Abuse linked to faith or belief, including accusations of spirit possession or witchcraft
- Racism and other prejudice-based harm, whether from adults, peers or institutions
- Self-harm and suicidal thoughts, and serious concerns about a young person's mental health
- Harm connected to poverty, homelessness, sofa surfing and unsafe housing

Risks we see most often in our work

Because we work with care-experienced young people and young people who are not in education, employment or training, some risks come up repeatedly. Staff and volunteers should be alert to them.

- A placement ending, a move, or a leaving care worker changing, and the loss of trusted adults that follows
- Sofa surfing or unstable accommodation, long before anyone uses the word homelessness
- Exploitation by people who present themselves as friends, partners or employers, including pressure to hand over money, keys, phones or bank details
- Money worries, unpaid work, and offers of work that are unsafe or unlawful
- Isolation, particularly where a young person is living independently for the first time
- Disengagement, missed sessions and unanswered messages, which we follow up rather than treat as lack of interest

5. Signs that may indicate abuse or harm

No single sign proves that a child is being abused, and many signs have other explanations. What matters is that concerns are recorded and shared so that a fuller picture can be built.

Physical signs

- Bruises, burns or injuries that are unexplained or explained inconsistently
- Untreated or repeated health problems
- Poor hygiene, hunger, or clothing that is unsuitable for the weather
- Gifts, cash, new phones or clothing that a young person cannot account for
- Signs of self-harm, or of substance use
- Signs that a young person may be at risk of female genital mutilation or forced marriage, including sudden plans to travel abroad

Behavioural signs

- Sudden changes in behaviour, mood, attendance or friendship groups
- Becoming withdrawn, anxious, fearful, aggressive or unusually compliant
- Fear of a particular person, place or going home
- Going missing, staying out overnight or returning from unexplained absences
- Sexualised behaviour or language that does not fit the young person's age or development
- Sleep problems, changes in eating, obsessive behaviour or difficulty concentrating
- Talking about being worthless, wanting to disappear, or not seeing a future

6. Roles and responsibilities

Role	Responsibility
Board of Trustees	Approves this policy, reviews safeguarding at every board meeting, makes sure the charity has the resources and training to keep people safe, and reports serious incidents to the Charity Commission
Designated Safeguarding Lead	Takes the lead on all safeguarding concerns, decides on referrals to children's social care and the police, keeps safeguarding records, provides advice and support to staff and volunteers, maintains links with local safeguarding partners, and makes sure training is up to date
Deputy Safeguarding Lead	Acts in place of the Designated Safeguarding Lead when they are unavailable, or where the concern involves the Designated Safeguarding Lead
Managers and programme leads	Make sure sessions are planned and staffed safely, that risk assessments are in place, and that facilitators and volunteers know how to raise a concern
All staff, volunteers, mentors and trustees	Complete safeguarding training, follow the code of conduct, recognise and report concerns without delay, and never investigate a concern themselves
Partner organisations	Follow their own safeguarding arrangements and ours when we deliver together, and agree in writing who holds responsibility for what

Training

- Everyone receives a safeguarding induction, including this policy and the code of conduct, before they work with children or young people
- All staff, volunteers and trustees complete safeguarding training at a level appropriate to their role, refreshed at least every two years or sooner if guidance changes
- The Designated Safeguarding Lead completes designated lead training and refreshes it at least every two years
- Everyone working directly with young people completes awareness training on exploitation, online safety and Prevent
- Safeguarding is a standing item in supervision and team meetings, so that learning is shared and practice is checked

7. What to do if you are worried about a child or young person

> **If a child or young person is in immediate danger**
>
> Call 999. Stay with the young person if they are with you. If they need urgent medical help, call an ambulance and use first aid while you wait. Tell the Designated Safeguarding Lead as soon as the immediate situation is safe.

1. Act on the same day. Do not wait to see whether the concern repeats itself.
2. Do not investigate. Do not question the young person, look for evidence or approach the person the concern is about.
3. Listen. Let the young person tell you what they want to tell you in their own words. Reassure them that they were right to tell you.
4. Never promise to keep a disclosure secret. Explain that you have to tell one person whose job it is to keep them safe, and who that person is.
5. Record what you have seen or been told using the reporting form in Appendix A, in the young person's own words wherever possible, within 24 hours and ideally the same day.
6. Pass the concern to the Designated Safeguarding Lead the same day. If they are unavailable, contact the Deputy Safeguarding Lead or the Chair of Trustees.
7. Keep the information confidential. Share it only with the Designated Safeguarding Lead and others who need to know.
8. If you believe the response is not protecting the young person, escalate. You can contact children's social care, the police or the NSPCC helpline yourself, and you can use our Whistleblowing Policy.

Talking with a young person who discloses

- Give them your full attention and take what they say seriously
- Use their words, not yours, and do not fill in gaps or suggest answers
- Tell them what you are going to do next and who else needs to know
- Ask what they would like to happen, and be honest about what you can and cannot control
- Do not react with shock, anger or judgement about anyone involved
- Make sure they know about Childline, and that they can contact them at any time

What the Designated Safeguarding Lead does next

- Considers the concern, the young person's wishes and feelings, and the level of risk
- Decides whether to make a referral to children's social care in the borough where the young person lives, to the police, or to another service
- Makes urgent referrals by telephone the same day, and confirms every referral in writing within two working days
- Decides whether the young person's family should be told, unless telling them would place the young person or someone else at risk, or would interfere with a criminal investigation. Where this applies, the decision is agreed with children's social care first
- Seeks advice from children's social care or the NSPCC helpline, without naming the young person, where it is not clear whether the threshold is met
- Records the decision, the reasons for it and the outcome, and follows up if there is no response from the receiving service
- Tells the young person what has happened wherever it is safe and appropriate to do so
- Considers whether the concern also needs to be reported to the Board of Trustees, to the Charity Commission as a serious incident, or to a funder, and whether support is needed for staff or volunteers involved

8. Allegations against staff, volunteers or trustees

An allegation may be that someone has harmed a child, may have committed a criminal offence against a child, has behaved in a way that indicates they are unsuitable to work with children, or has behaved in a way in their personal life that raises concerns about their suitability.

9. Report the allegation to the Designated Safeguarding Lead immediately. If the allegation concerns the Designated Safeguarding Lead, report it to the Chair of Trustees.
10. Do not speak to the person the allegation is about, and do not investigate.
11. The Designated Safeguarding Lead, or the Chair of Trustees, contacts the Local Authority Designated Officer in the borough where the concern arose, normally within one working day, and follows their advice.
12. Where a crime may have been committed, the police are contacted. Where a child is at immediate risk, children's social care and the police are contacted first.
13. Consideration is given to suspension or to changing duties while the matter is looked into. Suspension is a neutral act and not a disciplinary sanction.
14. Where someone is removed from work with children because they have harmed a child or pose a risk of harm, or would have been removed had they not resigned, a referral is made to the Disclosure and Barring Service. This is a legal duty.
15. The trustees consider whether the incident must be reported to the Charity Commission as a serious incident, and report it where the threshold is met.
16. Records are kept confidentially, including where an allegation is not substantiated, and support is offered to everyone involved.

9. Safer recruitment and Disclosure and Barring Service checks

Arc Initiative is committed to safer recruitment so that trustees, staff, facilitators, mentors and volunteers are suitable to work with children, young people and adults at risk.

- We use clear role descriptions and person specifications for every role that involves work with children, young people or adults at risk
- We advertise roles openly and ask for an application form or a detailed curriculum vitae with a covering statement
- We hold a structured interview that explores skills, values, motivation for working with young people and any gaps in employment history
- We take up at least two written references, including from the most recent organisation where the person worked or volunteered with children, young people or adults at risk, and we follow up anything that concerns us
- We check identity, right to work and relevant qualifications before appointment
- We ask candidates to self-declare anything that may affect their suitability, in line with the law on filtered and protected convictions

Disclosure and Barring Service checks

- We carry out checks in line with current Government guidance on eligibility
- Roles involving regular or intensive contact with children, young people or adults at risk, including programme leads, facilitators, mentors and regular volunteers, normally require an Enhanced check

- Where a role is regulated activity, an Enhanced check with the relevant barred list check is required
- No one works unsupervised with children, young people or adults at risk until satisfactory checks, references and identity checks are complete
- Where a role does not meet the threshold for a check, we carry out a risk assessment and put other measures in place, such as supervision and training
- We re-check every three years as good practice, or rely on the Disclosure and Barring Service update service where the person is registered
- Disclosure information is handled confidentially, stored securely and destroyed in line with our Privacy and Data Protection Policy. Positive disclosures are risk assessed by the Designated Safeguarding Lead and, where appropriate, by the Board

10. Safe practice, online delivery and communication

Code of conduct essentials

- Be publicly open. Avoid being alone and unobserved with a child or young person
- Where one-to-one work is part of the programme, such as mentoring, it is planned, recorded, known to a manager and takes place in an appropriate setting
- Use Arc Initiative accounts, devices and platforms. Do not use personal phone numbers, personal email addresses or personal social media to contact young people
- Do not connect with young people on personal social media accounts
- Do not give lifts, take a young person to your home, or meet a young person outside agreed activities
- Do not give or accept gifts, money or favours beyond agreed programme costs such as travel or food
- Maintain professional boundaries at all times. Any relationship that goes beyond the professional role must be declared immediately
- Challenge and report poor practice by colleagues, however senior

Online and hybrid delivery

- Send meeting links and passwords to participants on the day of the session, and generate a new meeting room and password for each session
- Where possible, two facilitators attend each session, one leading and one monitoring the chat and any issues that arise
- Use a waiting room, keep a pre-agreed attendance list, prevent participants from renaming themselves, and consider locking the room once everyone has joined
- Turn off private chat and screen sharing for participants unless they are needed
- Agree ground rules at the start, including not sharing personal details in the session or chat, and using a neutral or blurred background
- Do not record sessions unless written consent has been obtained in advance and it is clear how the recording will be used and stored
- If the facilitator has to leave the session, the session ends
- Do not take screenshots or screen recordings of sessions
- For one-to-one online sessions with anyone under 18, agree the arrangement in advance with a parent, carer or referring worker, and keep a record of the session
- Retain participant email addresses in line with our Privacy and Data Protection Policy so that safeguarding concerns can be followed up after a session

Social media, photography and digital content

- Do not post information that could identify or locate a child or young person without permission
- Check and respect the minimum age requirements of the platforms we use
- Moderate comments on our accounts regularly, or turn commenting off where moderation is not possible

- Obtain consent before sharing photographs, video or testimonials, and record that consent. For a young person under 18, consent is obtained from a parent, carer or person with parental responsibility as well as from the young person
- Never publish a young person's care status, safeguarding history or other personal circumstances alongside their image or name
- Withhold any detail that could identify or locate a young person, including school names, uniforms, street names and location tags
- Report online abuse or grooming that comes to our attention through our platforms to the police and, where relevant, to the platform

Using artificial intelligence tools safely

We teach young people to use artificial intelligence tools ethically and confidently. When staff and volunteers use these tools for our own work, they must not enter personal information about a young person, safeguarding information or anything that could identify a young person. Decisions about young people are made by people, not by software.

11. Records, information sharing and confidentiality

- Safeguarding records are factual, written as soon as possible, dated, signed and kept separately from general programme records
- Records are stored securely on Arc Initiative systems with access limited to the Designated Safeguarding Lead and those who need to know
- We share information when there is a safeguarding reason to do so. Data protection law does not prevent information being shared to keep a child safe
- We seek consent to share where it is safe and appropriate to do so, and we share without consent where seeking it would place someone at risk or interfere with a criminal investigation
- We record the reasons for sharing or not sharing information
- Retention of safeguarding records follows our Privacy and Data Protection Policy, and reflects the long retention periods that apply to child protection records

12. Working with schools, colleges, referrers and partners

- When we deliver on a partner's site, we follow their safeguarding procedures as well as our own, and we confirm the name and contact details of their designated safeguarding lead before delivery begins
- We agree in writing with each partner who holds responsibility for safeguarding, how concerns will be passed on, and how quickly
- Where a school or college refers a young person, we share attendance and progress information that they need, and we tell them about concerns that meet the threshold for sharing
- Where a leaving care team, children's social care or a health service refers a young person, we agree how information will flow in both directions and who the young person's allocated worker is
- We ask partners delivering with us to confirm that their staff and volunteers hold appropriate checks and training

13. Raising concerns about Arc Initiative

Anyone can raise a concern about safeguarding practice at Arc Initiative, including young people, parents, carers, referrers, staff and volunteers. Concerns about our work can be raised through our Complaints Policy, and concerns about wrongdoing can be raised through our Whistleblowing Policy. No one will be treated unfairly for raising a genuine concern. If a concern cannot be resolved with us, it can be raised with the local authority or the Charity Commission.

14. Reporting serious incidents

Trustees must report serious incidents to the Charity Commission. A serious incident includes an incident that results in, or risks, significant harm to beneficiaries, staff, volunteers or others who come into contact with the charity, and incidents that cause significant harm to the charity's work or reputation. The Designated Safeguarding Lead brings any potentially reportable incident to the Chair of Trustees without delay, and the report is made promptly rather than waiting for the outcome of an investigation. We also tell funders where our agreement with them requires it.

15. Key contacts

Contact	Telephone	Email
Designated Safeguarding Lead, Chidi O'Hanekwu	07568 438 366	chidi@arcinitiative.co.uk
Emergency services, if someone is in immediate danger	999	
Police, non-emergency	101	
Tower Hamlets Multi Agency Safeguarding Hub	0207 364 3444	mash@towerhamlets.gov.uk
Tower Hamlets children's social care	020 7364 2856	
Newham children's social care	020 3373 4600	
Waltham Forest children's social care	020 8496 2310	
Barking and Dagenham children's social care	020 8227 3811	
Local Authority Designated Officer, allegations about adults	Tower Hamlets - 020 7364 0677 Newham - 020 3373 6706 Waltham Forest - 020 8496 3646 Barking an Dagenham - 020 8227 3934	
NSPCC helpline	0808 800 5000	help@nspcc.org.uk
Childline, for young people	0800 1111	

16. Review and approval

This policy is reviewed every year by the Board of Trustees, and sooner if there is a change in the law, in statutory guidance, in our delivery, or following a safeguarding incident or a learning review.

Version	Date	Summary of changes
2.0	September 2026	Legal framework brought up to date, including Working Together to Safeguard Children 2026, Keeping Children Safe in Education 2026, the Children's Wellbeing and Schools Act 2026, the Data Protection Act 2018 and the Data (Use and Access) Act 2025. Added sections on exploitation and contextual harm, care-experienced young people and the transition to adult safeguarding at 18, allegations against staff and referrals to the Local Authority Designated Officer, serious incident reporting to the Charity Commission, training requirements, records and information sharing, partner and referrer arrangements, and the safe use of artificial intelligence tools
1.0	Earlier versions	Original policy and procedures

Signed on behalf of the Board of Trustees
Stephanie Nicola

Name and role
Stephanie Nicola

Date
01/09/2026

Appendix A. Form for reporting a concern about a child or young person

Use this form with the procedure set out in section 7. Complete it within 24 hours of the concern arising and give it to the Designated Safeguarding Lead.

Details of the child or young person	Information
Name	
Date of birth and age	
Gender	
Ethnicity and first language	
Additional needs, disability or communication needs	
Care status, for example care leaver or looked after	
Address	
Parent, carer or leaving care worker	
School, college or setting	
Referring organisation, if any	

Your details	Information
Your name and role	
Date and time of the incident or concern	
Date and time you are recording this	
Are you reporting your own concern or one raised with you by someone else	
If someone else raised it, their name and role	

What happened or what you were told. Use the young person's own words where you can. Include dates, times, and whether the information is first hand or from someone else

The young person's account and their wishes and feelings

Details of anyone alleged to have caused the harm or to be the source of the concern

Anyone who witnessed the incident or shares the concern

Have you spoken to the parent, carer or leaving care worker. If not, why not

Any previous concerns or existing support or risk plans that you are aware of

Summary of your discussion with the Designated Safeguarding Lead

Action taken, including any referral made, who it was made to, the date and time, and the name of the person spoken to

Outcome and follow up, including feedback from the receiving service

Signed, name, role and date

Appendix B. What to do at a glance

Step	Action
Immediate danger	Call 999. Stay with the young person if they are with you. Tell the Designated Safeguarding Lead as soon as it is safe
Act	Act the same day. Do not investigate and do not question the young person
Listen and record	Listen, reassure, and write down what you saw or were told in the young person's words, using the form in Appendix A, within 24 hours
Report	Give the form to the Designated Safeguarding Lead. If unavailable, the Deputy Safeguarding Lead or the Chair of Trustees
Decide	The Designated Safeguarding Lead decides whether to refer to children's social care or the police, seeking advice where the threshold is unclear
Refer	Urgent referrals are made by telephone the same day and confirmed in writing within two working days
Family	The family is informed unless doing so would put someone at risk or interfere with a criminal investigation. That decision is agreed with children's social care
Follow up	The Designated Safeguarding Lead records the outcome, chases a response if none is received, and considers whether to escalate
Escalate	If you believe a child remains at risk and the response is not adequate, escalate to children's social care, the police, the NSPCC helpline or through the Whistleblowing Policy
Review	Trustees consider learning from the incident, whether the incident is reportable to the Charity Commission, and what support the people involved need