



Safeguarding Policy and Procedures 2022

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1. Introduction

Career Accelerator believes in shaping a world where young people from diverse backgrounds are empowered to realise their full potential and become the future leaders of society. We support 14–30-year-old students from underrepresented backgrounds to prepare for careers in the modern economy through employer support led by top companies.

To achieve this, we run mentoring programmes for children and young people aged 14-30 years old. The School Programme operates predominantly through volunteers who are recruited from corporate partner companies and paired with students to have at least 3 1-hour mentoring sessions over the course of one half-term. Mentors and mentees can stay in touch with one another once the programme has finished. We also run group mentoring sessions, workshops, and assemblies with larger groups of students in secondary schools. These are supervised by members of staff from schools. We also run an LGBT+ Business Professional Mentoring, in which 18-30 year old LGBT+ people are mentored by volunteers from our corporate partners. We also run an additional programme for young people with Special Educational Needs and Disabilities. These young people are aged between 16-25, and take part in group mentoring sessions led by volunteers from our corporate partners.

2. Scope of the Policy

The scope and content of this policy refers to all our Programmes. The reason for this is that these mentors have unsupervised contact with young people, in the form of virtual mentoring sessions, and that they can have long-term relationships with these young people if they choose to do this.

The term 'children' relates to anyone who has not yet reached their 18th birthday seen face to face or virtually by Career Accelerator mentors. The fact that a child has reached 16 years of age, is living independently, or is in further education, is a member of the armed forces, is in hospital, or a young offenders institute does not change his or her entitlement to services or protection under the Children Act 1989.

Adults at risk (Vulnerable adults) are defined as:

- People aged 18 or over
- Who may be in need of community care services by reason of mental or other disability, age or illness: and
- Who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation

(Care Act 2014)

3. Purpose of the Policy

The purpose of this policy is:

- To protect children, young people, and adults at risk who access Career Accelerator's programmes and services from harm.
- To provide staff and volunteers, as well as children, young people, adults at risk and their families, with the overarching principles that guide our approach to safeguarding.

This policy applies to anyone working on behalf of Career Accelerator, including senior managers, paid staff, volunteers, sessional workers and students.

4. Safeguarding Statement

Career Accelerator is committed to ensuring the safeguarding of the children, young people and adults at risk with whom we work.

Those who have unsupervised access or contact with children and adults at risk are required to:

1. Understand and accept these responsibilities,
2. Be aware of the issues which can cause children and adults at risk harm as documented in this policy
3. Report safeguarding concerns in an appropriate and timely manner.

Career Accelerator will endeavour to safeguard children and adults at risk by:

1. Providing all volunteers who will have unsupervised contact with children and adults at risk with enhanced DBS checks OR checking any pre-existing enhanced DBS certificates to ensure that these are valid,
2. Appropriately training all staff and volunteers who will have unsupervised contact with children and adults at risk in safeguarding,
3. Providing clear guidance and expectations of behaviour to volunteers who are mentors on the programme,
4. Providing clear and effective avenues for these volunteers to report safeguarding concerns,
5. Clearly and effectively reporting these safeguarding concerns to our contacts within school and relevant local authority organisations where appropriate,
6. Maintaining and following an effective process to deal with any allegations about staff and volunteers.

We believe that:

- Children, young people and adults at risk should never experience abuse of any kind,
- We have a responsibility to promote the welfare of all children, young people, and adults at risk to keep them safe and to practise in a way which protects them,

We recognise that:

- The welfare of children and adults at risk is paramount in all the work we do and in all the decisions we take,
- All children, and adults at risk, regardless of age, disability, gender identity or reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse,
- Some children and adults at risk are additionally vulnerable because of the impact of previous experiences, the level of dependency, communication needs or other issues,
- Working in partnership with children, young people, adults at risk, their parents, carers and other agencies is essential in promoting welfare.

We will seek to keep children, young people, and adults at risk safe by:

- Valuing, listening to and respecting them,
- Appointing a specific Safeguarding Officer,
- Adopting child and adult at risk safeguarding best practice through our policies, procedures, and code of conduct for staff and volunteers,
- Recruiting and providing effective management for staff and volunteers through supervision, support, and training so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently,
- Selecting staff and volunteers safely, ensuring all necessary checks are made
- Recording, storing, and using information professionally and securely, in line with data protection legislation and guidance,
- Sharing information about safeguarding good practice with all those involved in the programme,
- Making sure that children, young people, adults at risk and their families know where to go for help if they have a concern,
- Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, adults at risk, parents, carers, and families appropriately,
- Using our procedures to manage any allegations against staff and volunteers appropriately,

- Ensuring that we provide a safe physical environment for children, young people, adults at risk, staff, and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance,
- Building a safeguarding culture where staff and volunteers, children, young people, adults at risk and their families, treat each other with respect and are comfortable about sharing their concerns.

5. Safeguarding Governance

Career Accelerator have a named Safeguarding Officer who is the first point of contact for safeguarding concern, queries and/or advice. The CEO retains ultimate responsibility for Safeguarding compliance and governance throughout the organisation.

Contact details:

Safeguarding:

Email contact: safeguarding@careeraccelerator.io

Safeguarding Officer:

Name: Rebecca Lewis

Email: rebecca@careeraccelerator.io

CEO:

Name: Mayur Gupta

Email: mayur@careeraccelerator.io

Phone: 07710 282136

6. Equality and Diversity statement

Career Accelerator treat all people with respect and dignity regardless of the protected characteristics of:

- Race,
- Sex,
- Disability,
- Age,
- Sexual orientation,
- Religious or other belief,
- Marriage and civil partnership,
- Gender reassignment
- Pregnancy and maternity.

7. Safeguarding Children

Given the risk of abuse to children and those using Career Accelerators Programmes, all volunteers and employees are required to be alert at all times to the possibility of abuse towards children or the disclosure of abuse. The definitions of abuse are found within 'Keeping Children Safe in Education 2021' (Part One). The categories and four key types of abuse are stated as:

- Physical
- Emotional
- Sexual
- Neglect

Within the Keeping Children Safe in Education 2021 states that "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. 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."

Indicators of abuse and neglect are defined in Keeping Children Safe in Education 2021 as follows:

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether the child is aware of what is happening or not. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving

children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) in education and all staff should be aware of it and of their responsibility for dealing with it, (for further information refer to paragraph 49, KCSIE)

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

All Career Accelerators employees or volunteers who work with children, will be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore employees and volunteers should always be vigilant and always raise any concerns with the Safeguarding Officer at Career Accelerator.

All employees and volunteers will have an awareness about specific forms of abuse and safeguarding issues that can put children at risk of harm ([KCSIE, Annex B](#)). Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education and [consensual and non-consensual sharing of nudes and semi-nude images and/or videos](#) can be signs that children are at risk. As per KCSIE other safeguarding issues that employees will be aware of include:

- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Children missing from education
- Female Genital Mutilation (FGM)
- Forced Marriage
- Prevent
- Modern Slavery
- Domestic Abuse
- Homelessness
- Upskirting
- Mental Health
- Peer on Peer Abuse
- Serious Violence

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their **mental health**, behaviour, and education. More information can be found in the [mental health and behaviour in schools guidance](#).

All employees and volunteers will be aware that children can abuse other children (often referred to as **peer on peer abuse**). And that it can happen both inside and outside of education and online. It is essential that all employees and volunteers challenge inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All employees and volunteers will be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from programmes, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or

signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All employees and volunteers will be aware of the range of risk factors which increase the likelihood of involvement in **serious violence**, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further information is available in the following Home Office guidance documents [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#)

8. Safeguarding Adults

Career Accelerator works with adults at risk, and those transitioning to adulthood during their time on allocated programs. Therefore, it is imperative that Career Accelerator employees and volunteers are aware of adult safeguarding concerns, along with the processes to refer on concerns appropriately.

An adult at risk of abuse can be anyone over the age of eighteen, students, employees, or volunteers. They may have additional support needs, meaning that they are more likely to experience abuse, and less able to protect themselves from it. Equally, many adults at risk have been victims or survivors of abuse and harmful experiences in childhood which have impacted upon their confidence, self-worth and resilience and compounded other personal characteristics increasing vulnerability.

Be mindful of the transition from child to adult, particularly with children who have physical or learning difficulties.. You can also visit the local Safeguarding Partnership website for further guidance.

Abuse includes:

Physical abuse:

- Hitting,
- Slapping,
- Punching,
- Scalding and burning,
- Misuse of medication,
- Inappropriate restraint,
- Kicking,
- Hair-pulling,
- Biting,
- Pushing,
- Rough handling,

- Physical punishments,
- Involuntary isolation or confinement,
- Forcible feeding or withholding food

Sexual abuse:

- Rape
- Indecent exposure
- Sexual harassment
- Inappropriate looking or touching
- Sexual teasing or innuendo
- Sexual photography
- Subjection to pornography or witnessing sexual acts
- Indecent exposure
- Sexual assault
- Sexual acts to which the adult has not consented or was pressured into consenting

Psychological or emotional abuse:

- Emotional abuse
- Threats of harm or abandonment
- Deprivation of contact
- Humiliation
- Blaming
- Controlling
- Intimidation
- Coercion
- Harassment
- Verbal abuse
- Cyber bullying
- Isolation
- Unreasonable and unjustified withdrawal of services or supportive networks

Financial or material abuse:

- Theft
- Fraud
- Internet scamming
- Coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance, or financial transactions
- The misuse or misappropriation of property, possessions, or benefits

Neglect and acts of omission: including withholding the necessities of life such as medication, food, or warmth, ignoring medical or physical care needs

Self Neglect:

- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health, or surroundings
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs

Discriminatory abuse:

- Harassment
- Slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, and religion

Institutional or organisational: including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment

Exploitation: either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain

Domestic Abuse: includes –

- Psychological
- Physical
- Sexual
- Financial
- Emotional
- Honour based violence

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. A new offence of coercive and controlling behaviour in intimate and familial relationships was introduced into the Serious Crime Act 2015. The offence will impose a maximum 5 years' imprisonment, a fine or both.

The offence closes a gap in the law around patterns of coercive and controlling behaviour during a relationship between intimate partners, former partners who still live together, or family members, sending a clear message that it is wrong to violate the trust of those closest

to you, providing better protection to victims experiencing continuous abuse and allowing for earlier identification, intervention, and prevention.

Modern Slavery:

- Slavery
- Human trafficking
- Forced labour and domestic servitude.
- Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment

Abuse may be carried out deliberately or unknowingly. Abuse may be a single act or repeated acts. Abuse may occur in any setting including private homes, day centres and care homes. Abuse may consist of acts of omission as well as of commission.

Key principles when working with Adults at Risk:

Empowerment

People being supported and encouraged to make their own decisions and informed consent

Prevention

It is better to take action before harm occurs.

Proportionality

The least intrusive response appropriate to the risk presented.

Protection

Support and representation for those in greatest need.

Partnership

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.

Accountability

Accountability and transparency in delivering safeguarding.

9. How to Recognise and respond to a Safeguarding Concern or disclosure of abuse

Disclosure is the process by which a child or adult at risk starts to share their experiences of abuse with others. In the event of an employee or volunteer having a potential safeguarding concern about a mentee, or a mentee makes a potential safeguarding disclosure to a member of staff or volunteer, then that concern or disclosure must be passed on to the Safeguarding Officer immediately without delay.

If a disclosure is made to a Career Accelerator volunteer who is working within a programme, the Designated Safeguarding Lead must also be contacted, this may be in a school or community setting.

The following steps below will be taken if a child or adult at risk makes a disclosure of abuse, or you have a concern about their safety or welfare:

Recognise

- Listen carefully to what is being said, without displaying shock or disbelief.
- Accept what is said. The person making the disclosure may be known to you as someone who does not always tell the truth. However, do not let your past knowledge of this person allow you to pre-judge or invalidate their allegation.
- Do not attempt to investigate the allegation. Your duty will be to listen to what is being said and to pass that information on.

Respond

- Acknowledge that it takes extraordinary courage for a child or adult at risk to go through the journey of disclosing abuse and therefore take reasonable steps to reassure them that they have been brave in informing you. For example, you could say: "You're not to blame. This is not your fault".
- Allow the person to speak without interruption, encouraging them to tell you only what they feel comfortable telling you, and be accepting and be non-judgemental about what is said.
- Do not ask leading questions of any kind, questions must be open.
- Do not promise them that you will not inform anyone else, and you will keep this confidential. You have a duty to pass this information to the Safeguarding Officer for the protection of the child or adult at risk.

Report

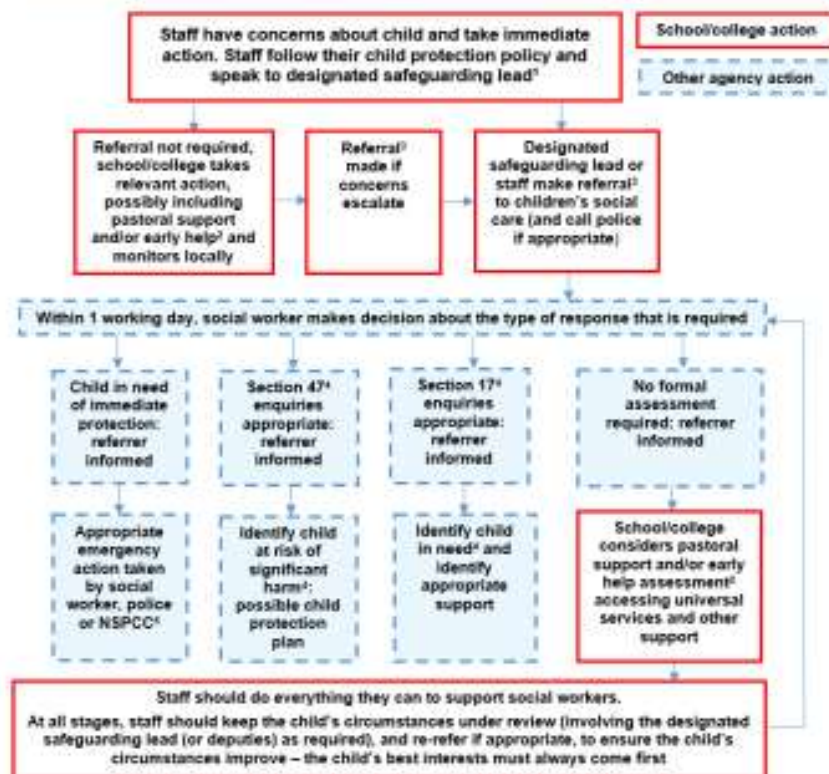
If a Career Accelerator employee or volunteer has any safeguarding concerns in regard to a child or adult at risk, or suspects abuse, but it has not been disclosed by the person, Career Accelerator staff or volunteers should not discuss their suspicions with the person in question or conduct any form of investigative work.

The following steps will be followed in reporting a safeguarding concern:

- Where a child or adult at risk is suffering, or is likely to suffer from harm, it is important that a referral to children's or adult's social care (and if appropriate the police) is made immediately, Fig 1.

- As soon as possible report your concerns to the Career Accelerator Safeguarding Officer
- Career Accelerators Safeguarding Officer will contact the relevant Child or Adult Social Care Team and/or local Police Child Protection Unit.
- A telephone referral to Children's or Adult Social Care must be followed up in writing within 24 hours.
- Within one working day of a referral being made for a child, a local authority social worker should acknowledge receipt to the referrer and decide about the next steps and the type of response that is required. This will include determining whether:
 - the child requires immediate protection and urgent action is required;
 - the child is in need, and should be assessed under section 17 of the Children Act 1989;
 - there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
 - any services are required by the child and family and what type of services;
 - further specialist assessments are required to help the local authority to decide what further action to take; and
 - to see the child as soon as possible if the decision is taken that the referral requires further assessment.
- If the referral is for an adult at risk, then following an alert, a Safeguarding Adults Manager from Adult Social Care will decide if the safeguarding process should be instigated or if other support/services are appropriate. Feedback will be given to the person who raised the safeguarding adults alert. If the Safeguarding Adults Manager decides the safeguarding process needs to be instigated this will then lead to the implementation of the next stages of the Multi-Agency Policy and Procedures.
- Career Accelerator shall not, under any circumstances, undertake any independent investigation or questioning (as this may jeopardise any enquiry) unless or until Career Accelerator is given authorisation by the Authorities. Following authorisation, Career Accelerator may independently follow up on the allegation.
- All allegations or suspicions shall be referred as per this policy and those set out by partner agencies and the local authority. Any information about suspicious behaviour or circumstances will be passed to the local Police Child Protection Unit or the local Social Services within 24 hours or as soon as shall be reasonably practicable.
- Career Accelerator will liaise with relevant individuals in schools and organisations as appropriate and/or as directed by professionals from the police and social care.

Actions where there are concerns about a child



KCSIE, 2021, page
there are concerns about a child

23: Actions where

Record

- Take notes as soon as it is practical to do so. Record the actual words spoken by the child or adult at risk – if it is a child disclosing or reporting, do not re-translate them into the way that adults speak or try to make sense of the structure of what was said
- Make a note of the young person's name, the time and date within your written record
- Career Accelerator shall retain a copy of all such notifications in accordance with GDPR guidelines.
- Report the facts as you know them/ or understand them, including the young person's name and the account given to you by the young person using the words that they used as well as including any other information you feel is relevant.
- Complete the Career Accelerator Safeguarding Reporting Form
- Provide this detailed information to the Career Accelerator Safeguarding Officer as soon as you are able.
- Career Accelerator shall retain a copy of all such notifications in accordance with GDPR guidelines.

Key points to decision making are:

- If immediate action is needed this requires a referral to the police or immediately to Child or Adult Social Care depending on the situation
- Students and/or parents (if a child) should normally be informed of a referral being made, where it would not cause further harm to do so
- If in doubt err on the side of caution and seek advice from the Career Accelerator Safeguarding Officer
- Referrals can be made without consent if there is a good reason to do so e.g., a risk to others, immediate risk to self
- Advice may be taken from Child or Adult Social Care and/or other advice-giving organisations such as Police.

10. How to Report (internally) including emergency situations

All safeguarding concerns should be reported internally to Career Accelerators Safeguarding Officer. If initially reported verbally or via email, this should be followed up as soon as reasonably possible, and within 24 hours via the Career Accelerator Safeguarding Reporting Form.

In the event of an emergency, there should be no delay in seeking emergency support from the relevant emergency services. The safeguarding issue should be reported internally once the immediate risk has been dealt with. The immediate actions can be recorded on the Career Accelerator Safeguarding Reporting Form

11. How to Refer to Statutory Services i.e. Social Services and the Police

Volunteers must share all concerns with the Career Accelerator Safeguarding Officer, who will advise and will liaise with social care/police and relevant agencies as appropriate.

Referrals of safeguarding concerns made to social services can initially be made via telephone and then followed up in writing on the prescribed form within 48 hrs. The referral will need to be made to the Local Authority within which the child or adult at risk the concerns relate to reside. Each area will have their own Safeguarding Partnership or Safeguarding Board where you will find the local referral form and contact details with which to submit the referral. A copy of the form submitted should be saved and submitted to the Career Accelerator Safeguarding Officer along with the safeguarding reporting form. In schools and organisations where there is a Designated Safeguarding Lead or officer, a copy of relevant forms should be shared as appropriate.

Social services should acknowledge your written referral within one working day of receiving it, so if you have not heard back within 3 working days, contact social services again.

Any difficulty or disagreement in outcome should be discussed with the Safeguarding Officer who can access the relevant escalation processes if required.

If any of the concerns constitute an emergency or require police referral, this should be done without delay. Any report to the police should be noted within the Career Accelerator safeguarding reporting form and crime number noted on the form for future reference.

Seven golden rules for information sharing:

Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.

Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

Seek advice if you are in any doubt, without disclosing the identity of the person where possible.

Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgment, that lack of consent can be overridden in the public interest. You will need to base your judgment on the facts of the case.

Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.

Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.

Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

12. How to Record Safeguarding Concerns

It is extremely important that the recording of information about safeguarding issues are written in such a way that it is legible and chronological; that all discussions with other professionals / agencies are recorded and confirmed in writing. The name of any contact is recorded with telephone numbers if available, that direct quotes used where possible.

All information should be factual and not opinion. Legislation such as the Data Protection Act (1990), Human Rights Act (1998) or individual professional guidance on confidentiality or information sharing is not meant to be a bar to sharing relevant information on a need-to-know basis.

13. Safeguarding Allegations against staff and volunteers

This policy should be read in conjunction with the Career Accelerator Allegations Policy, the main points of which can be found below:

13.1 Allegations made against Career Accelerator Volunteer Mentor

In instances where an allegation is made against a volunteer mentor, Career Accelerator will take the following action to ensure the safeguarding of all involved:

1. Make a written record of the nature of this allegation,
2. Inform the relevant Safeguarding Partnership within 24 hours that this allegation has been made,
3. Inform the volunteer whom the allegation has been made against, and suspend their involvement in the Career Accelerator programme,
4. Inform the volunteer's permanent employer that an allegation has been made,
5. Inform the partner school or youth organisation that one of their students has made an allegation, and discuss with them the best ways in which to involve the students' families,
6. Continue to liaise with the relevant Safeguarding Partnership's Local Authority Designated Officer (LADO) while the investigation is ongoing,
7. Keep accurate and clear records through the course of the investigation,
8. Follow the guidance of the LADO, and any police guidance, regarding the outcome of this investigation for the volunteer,
9. Maintain any records of the allegation and investigation for up to 10 years.

In some instances, Career Accelerator will also launch a case review to reflect upon this allegation and reform safeguarding policy and procedure where necessary.

13.2 Allegations made against Career Accelerator Staff:

Anyone can make an allegation against a Career Accelerator member of staff. In this instance, the following action should be taken:

- A. Any allegations made against Rebecca Lewis (Head of Youth Programmes and Safeguarding Officer) should be reported to Mayur Gupta (CEO of Career Accelerator),
- B. Any allegations made against Mayur Gupta should be reported to Rebecca Lewis, (Head of Youth Programmes and Safeguarding Officer)
- C. Any allegations made against **All** members of staff from Career Accelerator should be reported directly to Brent Safeguarding Partnership.
- D. Any allegations relating to any Career Accelerator member of staff will be referred to an external third party for objectivity purposes.

In instances where an allegation is made against a Career Accelerator member of staff, the following action will be taken:

1. A written record of the nature of this allegation will be made,
2. Brent Safeguarding Partnership will be informed within 24 hours,
3. The member of staff whom the allegation has been made against will be informed, and appropriate action will be taken to prevent them from having further contact with young people in their role,
4. An external third party will be informed to provide support for the Career Accelerator investigation and response,
5. The relevant partner school or youth organisation will be informed that one of their students has made an allegation, and discuss with them the best ways in which to involve the students' families,
6. Brent Safeguarding Partnership's Local Authority Designated Officer (LADO) will liaise with relevant individuals while the investigation is ongoing,
7. Accurate and clear records will be kept through the course of the investigation,
8. Disciplinary measures will be taken based on the suggestions of the LADO, and police authority if relevant,
9. Any records of the allegation and investigation will be stored for up to 10 years.

In some instances, Career Accelerator will also launch a case review to reflect upon this allegation and reform safeguarding policy and procedure where necessary.

14. Support for staff

Employees and volunteers who require further information or support with safeguarding are encouraged to contact Career Accelerator's Safeguarding Officer.

Career Accelerator will endeavour to provide up to date support and guidance to all employees and volunteers when it comes to safeguarding and their duty to protect children or adults at risk who are users of Career Accelerators programmes and services from harm.

15. Recruitment Selection and Training

Career Accelerator will strictly adhere to the recruitment, selection and vetting checks that must be made on all employees or workers who work with children. These requirements are incorporated into our recruitment procedures and are fully compliant with government guidelines as set out in the current government guidance, Keeping Children Safe in Education, Working Together to Safeguard Children and Disqualification under the Childcare Act.

Career Accelerator and our partners will also adhere to the specific duties and responsibilities for an employer in relation to barred persons and the sharing of information about individuals

to the relevant bodies (i.e., Local Authority Designated Officer (LADO) and the Disclosure & Barring Service (DBS)).

The following checks shall be completed prior to an employee or worker starting any work with children or adults at risk, and repeated during service:

- Confirm the true identity of the applicant in line with current guidelines, this must include photographic ID/date of birth check/change of name check – currently performed virtually
- Confirm the applicants address.
- Right to work in the UK
- Obtain an enhanced DBS certificate and/or verify a valid DBS certificate and perform a status check on that document
- Give applicants the opportunity to declare any convictions, cautions or reprimands, warnings or bind-over's in line with current [DBS filtering rules](#) (introduced May 2013, updated November 2020)
- Give applicants the opportunity to declare and explain any gaps in work history, and investigate these as deemed necessary

16. Whistleblowing

Individual employees and volunteers have a duty to raise concerns with Career Accelerator, who in turn, has a duty to ensure employees and volunteers can easily express their concerns and that those concerns are dealt with thoroughly and fairly. This procedure does not affect existing guidance on statutory complaints procedures, and it does not change or replace any local or nationally agreed terms and conditions of employment.

Career Accelerator recognise that it is not always easy to report concerns. You may be unaware of how to do so, or may worry that you are being disloyal, or fear reprisals; however, the health and wellbeing of the people in our workplace and on our programmes must always be your primary concern.

Raising or escalating your concern early can prevent minor issues becoming serious ones, thus protecting the public from harm and improving standards. If you wish to keep your identity confidential Career Accelerator will not disclose this without your consent. The exception to this is if a child, adult at risk or employee/volunteer is at serious risk then confidentiality may not be applicable, for example – child protection.

If the situation arises where we are not able to resolve the concern without revealing the individual's identity (for instance if your evidence is needed in court), we will discuss this you. At any stage during the process, we recommend that you seek advice from your professional body, trade union or the independent whistleblowing charity, Public Concern at Work (PCaW).

The independent charity Public Concern at Work (Tel: 020 7404 6609), have lawyers who can give free independent advice at any stage about how to raise a concern in relation to serious malpractice at work.

Career Accelerator and its employees/volunteers will adhere to and comply with the public interest disclosure act 1998.

In October 2021 the Government updated the guidance: [Blowing the whistle: list of prescribed person and bodies](#) which details where malpractice can be reported.

Protection for whistle-blower

You are protected as a whistleblower if you:

- are a 'worker'
- believe that malpractice in the workplace is happening, has happened in the past or will happen in the future
- are revealing information of the right type (a 'qualifying disclosure')
- reveal it to the right person, and in the right way (making it a 'protected disclosure')

'Worker' has a special wide meaning in the case of whistleblowing. As well as employees it includes, agency workers and people who aren't employed but are in training with employers. Some self-employed people may be considered to be workers for the purpose of whistleblowing if they are supervised or work off-site.

All employees who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Reporting wrongdoing

Concerns of wrongdoing can be raised either informally or formally, depending on how serious you feel the situation to be. You should raise your concern to the level of management you feel most appropriate from your immediate manager, Safeguarding Officer to the CEO. If your concern involves the CEO, you should raise your concern with Rebecca Lewis, Safeguarding Officer.

Informal

In the first instance, you may wish to raise a concern you have about wrongdoing on an informal basis. Concerns raised on this basis will remain confidential and will be investigated as fully as possible. However, informal allegations may result in a less detailed response to that of a formal investigation.

Formal

If you would like to raise a concern of wrongdoing on a formal basis, you should submit your concern in writing to the level of management you feel most appropriate. Your written notification of a concern should include the following information:

- a) The fact that you are raising your concern formally under whistleblowing procedures;
- b) Background and history of the events (including dates); and
- c) The reason why you are particularly concerned about the situation.

Members of staff and volunteers are not expected to prove beyond doubt the truth of their allegation. However, all applications should be made in good faith and the individual should be able to demonstrate that there are reasonable grounds for their concern.

Investigations

All complaints of wrongdoing will be investigated whether they have been raised formally or informally.

Formal allegations should be forwarded to the appropriate manager within 48 hours of receiving a concern. Within 10 working days of a formal allegation being submitted, a member of management should write to the member of staff who raised the concern to confirm:

- 1) They have received the allegation;
- 2) The proposals for dealing with the matter;
- 3) The expected timescale for providing a final response; and
- 4) Whether further investigations are deemed necessary and, if not, why not.

Any individual asked to attend an investigatory meeting may wish to invite a work colleague to accompany them.

Following the investigation, you will be provided with as much information regarding the outcome as possible. However, some details may need to be withheld to protect the privacy of other individuals involved.

Career Accelerator is committed to ensuring that your work environment will not be affected as a result of you raising a concern. If you do feel that you are being treated less favorably, you should raise this matter with your management contact.

Malicious Concerns

The organisation cannot condone abuse of this procedure and if following investigation, a member of staff is found to have raised concerns maliciously, the matter will be dealt with under the Career Accelerator Disciplinary Procedures.

NSPCC Advice Line

Provides free help and advice to people who suspect their organisation might be putting children at risk, even if they're not certain that this is the case. You can call the advice line about an incident that happened in the past, is happening now, or that you believe might happen in the future.

The advice line isn't intended to replace any current practices or responsibilities of organisations working with children. The NSPCC encourage professionals to raise any concerns about a child to their own employer in the first instance.

Professionals can contact the NSPCC on the link below:

[NSPCC Whistleblowing Advice Page](#)

Email - help@nspcc.org.uk

Call - 0800-028-0285

17. Consent and Capacity

It is important to be alert to issues of cognitive capacity which can increase the vulnerability of people where they have a reduced ability to make informed decisions in the moment. This may be short term or transient (e.g. due to fear, shock, injury, illness) or long term (e.g. due to learning differences, disability, mental health issues).

Whilst this is a complex issue, it should not get in the way of staff and volunteers genuinely seeking to ensure that all individuals are respectfully consulted in relation to participation in activities and/or sharing of information about them.

A young person aged 16 or older is presumed in law to have capacity to consent, unless there is evidence to the contrary. Capacity to consent is not simply based on age however, particularly where learning and communication difficulties and disabilities are identified. You should also consider a person's capacity to understand the consequences of giving or withholding their consent. They should not be treated as unable to make a decision until all practicable steps to help them have been taken.

It is important to try and ensure that they really understand the issues and are not just agreeing to what is proposed. If you are unsure whether they have the capacity to consent, then you should seek advice from the Safeguarding Officer Rebecca Lewis, or the NSPCC Helpline staff (0808 800 5000), The person's friends, carer, another professional working with them, or an advocate, where available, may be able to provide relevant information or advice where consulting these people does not increase potential risks.

The following criteria should be considered when assessing whether a person has sufficient understanding at any time to consent, or to refuse consent, to sharing of information about them or participating in specific activities:

- Can the person understand the question being asked of them?
- Are they taking an active part in the discussion?
- Can they rephrase the question in their own words?
- How would they explain it to someone else?
- Do they have a reasonable understanding of what the risks or benefits of giving their consent or saying no?
- What do they say they think would happen if they agree the action being suggested?
- Can they appreciate and consider the alternatives, weighing up one aspect against another and express a clear and consistent personal view? Encourage them to say out loud, or write down, their view of the pros and cons. You could recheck these views later or at a later contact with them

18. Storage of Safeguarding Records

Career Accelerator will ensure that all details associated with an allegation of abuse or safeguarding concern are recorded clearly and accurately.

The records will be maintained securely in line with Career Accelerators procedures for maintaining and storing records.

19. Code of Conduct

All Career Accelerator mentors who encounter children and adults at risk through Career Accelerator work must comply with the Code of Conduct requirements here relating to safeguarding.

Career Accelerator mentors have a responsibility to safeguard students and to protect themselves from allegations. They must:

- Be familiar with and act in accordance with Career Accelerator policies and procedures regarding child protection and safeguarding, in addition to those of their employers.
- Treat all people with respect
- Avoid being alone or unsighted with children and adults at risk, unless authorised to do so
- Be aware that any physical contact with students can be misinterpreted and be careful of the way language used can also be misinterpreted
- Be aware of the steps taken in the event of becoming aware of, suspecting or receiving allegations of abuse or disclosure

Mentor code of conduct - Schools Programme

The following expectations have been created to support you and safeguard your mentee. We hope that these will allow you to make the most of the programme and build good relationships whilst maintaining professional boundaries.

1. If you have any safeguarding concerns about your mentee, you must report it to the safeguarding@careeraccelerator.io email address as soon as possible. Please use the reporting proforma to do this to ensure you have included any and all relevant information.
2. During your conversations with mentees, ensure you maintain professional boundaries and use of appropriate interactions with young people.
3. Only contact your mentee using the school email which we have provided you with. Do not exchange personal social media such as Instagram, Facebook, snapchat or TikTok. You are able to connect with your mentee on LinkedIn if they are 16 years or older, in line with LinkedIn's minimum age policy.
4. If you have any sessions outside of our scheduled/suggested times, please inform Career Accelerator about this change. Email Rebecca Lewis, Head of Youth Programmes and Safeguarding Officer, when these new sessions are and invite her to the calendar invite.
5. You must record all of your sessions. Immediately after your mentoring session, you must share these with Rebecca Lewis using the secure Google Drive folder which will have been shared with you. You must also then delete the recording in your own personal documents. These recordings will only be accessible to staff at Career Accelerator unless a further investigation is necessary due to an allegation (see allegations policy for details).
6. If you introduce your mentee to any of your professional network, you will need to supervise any contact that they have. This will include being CC'ed into emails and being present in any of their calls. The reason for this is that they will not have enhanced DBS checks. Please inform Rebecca Lewis about this new connection.
7. If you continue your mentoring relationship after you have completed your 3 sessions, please inform Rebecca Lewis that you are planning to keep in contact with your mentee. You will be asked to complete frequent check-ins so that Career Accelerator has a clear understanding of this ongoing contact.
8. You must not share personal information about your mentees, including on social media.
9. You must not take or share photos of your mentoring sessions, including on social media.
10. You are welcome to share about your experience of mentoring with Career Accelerator on your professional social media as long as the information you share cannot identify your mentee (e.g. their name, school etc), and does not include photos of them. You are welcome to use photos which have already been shared on Career Accelerator's social media.

Mentor code of conduct - Neurodiversity and Disability Programme

The following expectations have been created to support you and safeguard your mentee. We hope that these will allow you to make the most of the programme and build good relationships whilst maintaining professional boundaries.

1. If you have any safeguarding concerns about your mentee, you must report it to the safeguarding@careeraccelerator.io email address as soon as possible. Please use the reporting proforma to do this to ensure you have included any and all relevant information.
2. During your conversations with mentees, ensure you maintain professional boundaries and use of appropriate interactions with young people.
3. If you are contacting your mentee independently of Career Accelerator, only use the email address which we have provided you with. Do not exchange personal social media such as Instagram, Facebook, snapchat or TikTok. You are able to connect with your mentee on LinkedIn if they are 16 years or older, in line with LinkedIn's minimum age policy.
4. You must record all of your sessions. Immediately after your mentoring session, you must share these with Rebecca Lewis, Head of Youth Programmes and Safeguarding Officer, using the secure Google Drive folder which will have been shared with you. You must also then delete the recording in your own personal documents. These recordings will only be accessible to staff at Career Accelerator unless a further investigation is necessary due to an allegation (see allegations policy for details).
5. Please do not introduce any of your professional network directly to the young people on the programme. Instead, if you feel that your colleagues or contacts might be interested in the programme, direct them to contact Mayur the CEO of Career Accelerator.
6. You must not share personal information about your mentees, including on social media.
7. You must not take or share photos of your mentoring sessions, including on social media.
8. You are welcome to share about your experience of mentoring with Career Accelerator on your professional social media as long as the information you share cannot identify your mentee (e.g. their name, school etc), and does not include photos of them. You are welcome to use photos which have already been shared on Career Accelerator's social media.

Mentor code of conduct - LGBT+ Business Mentoring Programme

The following expectations have been created to support you and safeguard your mentee. We hope that these will allow you to make the most of the programme and build good relationships whilst maintaining professional boundaries.

1. If you have any safeguarding concerns about your mentee, you must report it to the safeguarding@careeraccelerator.io email address as soon as possible. Please use the reporting proforma to do this to ensure you have included any and all relevant information.

2. During your conversations with mentees, ensure you maintain appropriate professional boundaries and interactions.
3. Inform Rebecca Lewis, Head of Youth Programmes and Safeguarding Officer, about the timing of your mentoring sessions by adding her to the calendar invites. No-one from Career Accelerator will be attending these sessions.
4. If you are planning on meeting up with your mentee in person, inform Rebecca Lewis about this.
5. If you continue your mentoring relationship after you have completed your 3 sessions, please inform Rebecca Lewis that you are planning to keep in contact with your mentee. You will be asked to complete frequent check-ins so that Career Accelerator has a clear understanding of this ongoing contact.
6. You must not share personal information about your mentees, including on social media, without their explicit consent.
7. You must not take or share photos of your mentoring sessions, including on social media, without their explicit consent.
8. You are welcome to share about your experience of mentoring with Career Accelerator on your professional social media as long as the information you share cannot identify your mentee (e.g. their name, organisation etc), and does not include photos of them. You are welcome to use photos which have already been shared on Career Accelerator's social media.

20. Underpinning Legislation and Guidance

Legal Framework:

This policy has been drawn up on the basis of law and guidance that seeks to protect children and adults at risk in England, namely:

- The Children Act 2004
- Working Together to Safeguarding Children 2018
- Data Protection Act 2018
- Keeping Children Safe in Education 2021
- Other documents and guidance regarding best practice by the NSPCC
- Care Act 2014
- Human Rights Act 1998

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents.

- Allegations Policy
- Code of Conduct
- Mentor Pack

21. Local Safeguarding Partnerships or Boards (Children and Adults)

This policy document should be read and implemented in conjunction with the relevant Safeguarding Partnership documents and procedures for the area in which the child or adult at risk resides.

22. Quality and Review

This policy should be reviewed annually, and any changes, along with their author and designation should be documented in the version table found at the end of this document.

If Career Accelerator become aware of any significant changes in safeguarding legislation or national policy, changes should be made prior to the annual review date.

Career Accelerator will review all safeguarding records regularly as part of its ongoing monitoring to identify any patterns or trends which will shape and inform training, policy, procedures, and practice

23. Appendices- supporting information

Appendix A - Career Accelerator Safeguarding Reporting Form

Part 1 (for use by any employees/volunteers)

Name:	Programme:
Date and Time of Incident:	Date and Time (of writing):
Name: Print Signature	
Job Title:	
Record the following factually: What are you worried about? Who? What (if recording a verbal disclosure by a child use their words)? Where? When (date and time of incident)? Any witnesses?	
What is the persons account/perspective?	
Any other relevant information (distinguish between fact and opinion). Previous concerns etc.	

Check to make sure your report is clear to someone else reading it.

Please submit this form to Rebecca Lewis, Safeguarding Officer.

safeguarding@careeraccelerator.io

Part 2 (for use by Safeguarding Officer)

<p>Time and date information received, and from whom.</p>	
<p>Any advice sought – if required (date, time, name, role, organisation and advice given).</p>	
<p><u>Action taken</u> (referral to children’s social care/monitoring advice given to appropriate staff/CAF etc.) with reasons.</p> <p>Note time, date, names, who information shared with and when etc.</p>	
<p><u>Parent’s informed?</u> Y/N and reasons.</p>	
<p><u>Outcome</u> Record names of individuals/agencies who have given information regarding outcome of any referral (if made).</p>	
<p>Where can additional information regarding child/incident be found (e.g. pupil file, serious incident book)?</p>	
<p>Should a concern/confidential file be commenced if there is not already one? Why?</p>	
<p>Signed</p>	
<p>Printed Name</p>	

Part 2 (for logging concerns/information shared with the school or youth organisation)

Students Name:	Date of Birth:
Date and Time of Incident:	Date and Time of receipt of information: Via letter / telephone etc.
Recipient (and role) of information:	
Name of caller/provider of information:	
Organisation/agency/role:	
Contact details (telephone number/address/e-mail)	
Relationship to the child/family:	
Information received:	
Actions/Recommendations for the school:	
Outcome:	
Name:	
Signature:	
Date and time completed:	
Counter Signed by Designated Safeguarding Lead	
Name:	
Date and time:	

Appendix B – LGBTQ+ Community Considerations

Career Accelerator work with members of the LGBTQ+ community through their mentoring programmes. This policy and its contents are relevant to all staff, volunteers and children, young people and adults at risk who use Career Accelerators programmes. The following guidance relates specifically to considerations for the LGBTQ+ community.

Concerns about LGBTQ+ children and young people should be dealt with sensitively, taking into consideration any complicated feelings they might have about their sexuality or gender identity. LGBTQ+ children and young people might not want to come out to everyone in their life.

Sharing a person's gender identity or sexuality might put them at extra risk. You could also break a person's trust if you share information about their gender identity or sexuality without their permission, or without letting them know first. You should only share information about a person's sexuality or gender identity if they give you permission, or if it's relevant to a safeguarding concern.

For example, you might have to tell someone about a young person's sexuality or gender identity if:

- they are experiencing homophobic, biphobic or transphobic bullying
- they are using adult dating apps
- there is a concern they might have been groomed or coerced into a sexual relationship
- there is a concern they might be experiencing sexual abuse or exploitation
- they are experiencing or are at risk of homelessness because their family are unsupportive of their gender identity or sexuality

Appendix C – Special Educational needs and disabilities (SEND) Considerations

The term special educational needs and disabilities (SEND) refers to children and adults who have disabilities or additional needs. Research suggests that children with disabilities are at particular risk of abuse, and that the presence of multiple disabilities appears to increase the risk of both abuse and neglect.

Career Accelerator work with members of the SEND community through their mentoring programmes. This policy and its contents are relevant to all staff, volunteers and children, young people and adults at risk who use Career Accelerators programmes. The following guidance relates specifically to considerations for the SEND community.

Adults who work with children, young people and adults with SEND should be aware of the additional needs' which could mean they are more vulnerable to abuse and/or less able to speak out if something isn't right.

Some individuals may be vulnerable because they:

- have additional communication needs
- they do not understand that what is happening to them is abuse
- need intimate care or are isolated from others
- are dependent on adults for care.

(Miller, D. and Brown, J. (2014) ['We have the right to be safe': protecting disabled children from abuse](#). London: NSPCC).

Communication barriers

Children, young people and adults with speech, language and communication needs (including those who are d/Deaf, or have a learning disability or physical disability) face extra barriers when it comes to sharing their worries and concerns.

- Adults may have difficulty understanding communication methods, which makes disclosing abuse difficult and sharing wishes and feelings harder.
- Communicating solely with parents or carers may pose a risk if the parent or carer is the abuser.

- Sharing messages about what abuse is or how to keep safe for individuals with some additional needs may require specialist resources and expertise. Without this knowledge it is difficult to recognise that abuse has or is happening.

It can be difficult for anyone who has experienced abuse to get the support they need, but those with additional needs may face extra problems such as communication. In addition, if abuse is reported to the police and/or children's social care, the response may be affected if professionals lack skills or experience in working with disability.

This [video](#) can help deaf children understand how Childline is there to support them and can be shared with them if deemed appropriate.

Misunderstanding the signs of abuse

It's not always easy to spot the signs of abuse. In some cases, adults may mistake the indicators of abuse for signs of a individual's disability.

- A child/young person or adult experiencing abuse or attempting to disclose abuse may self-harm or display inappropriate sexual behaviour or other repetitive and challenging behaviours. If this is misinterpreted as part of a disability or health condition rather than an indicator of abuse, it can prevent adults from taking action.
- Injuries such as bruising may not raise the same level of concern. Adults may assume that bruising was self-inflicted or caused by disability equipment or problems with mobility.

Increased isolation

Individuals with additional needs and their families may have limited access to support systems. Support may not be available due to lack of funding, or it may not be appropriate for to meet physical, emotional, or cultural needs. This inevitably means that they have less people to reach out to for help or report concerns or abuse to.

Appendix D – Digital Safeguarding considerations

Career Accelerator delivers many of its programmes virtually, therefore it is imperative that employees and volunteers have an understanding of digital safeguarding considerations and are aware of their own behaviour and conduct when delivering programmes and support online. Sessions are recorded in the event of an allegation. Access to these recordings is prohibited by staff or volunteers for any other reason or to review sessions with mentees. You will not access recorded sessions that are not your own without express permission.

Across the UK, criminal and civil legislation aims to prevent a range of abusive activities online including:

- Stalking
- Harassment
- Improper use of a public communications network
- Sending indecent, offensive, false or threatening communications
- Sending private sexual photos or videos of another person without their consent.

Career Accelerator seeks to keep children and young people and adults at risk safe by:

- Providing clear and specific directions to staff and volunteers on how to behave online through our Code of Conduct
- Supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- Supporting and encouraging parents and carers to do what they can to keep their children safe online
- Reviewing and updating the security of our information systems regularly
- Ensuring that usernames, logins, email accounts and passwords are used effectively
- Ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate
- Ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- Examining and risk assessing any social media platforms and new technologies before they are used within the organisation.

- Ensuring employees and volunteers are aware of their responsibility to deliver virtual/online sessions in safe and secure locations free of distractions and other people in the background

Appendix E – Alumni Safeguarding Considerations

Following on from any completion of participation in programmes run by Career accelerator, students can consent to a continuing relationship with their Mentor.

The principles and processes within this policy remain the same for these alumni cohorts.

Version	Changed by	Date	Circulation	Comments
1.0	Rebecca Lewis	23/01/2022		First version
2.0	The Athena Programme	20/06/2022		Reviewed, approved and published

