Safeguarding & Child Protection Policy

Created by:	Jan Appleton
Approved by:	Board of trustees
Approval date:	20th October 2026
Next review date:	October 2027

Key Roles and Contacts

Role	Name and Job Title	Contact
Designated Safeguarding Lead (DSL) and Designated Teacher (DT)	Jan Appleton (Director)	07474-576569 (24-7 number)
Deputy Designated Safeguarding Lead (dDSL) and Prevent Duty Lead	Jonathan Horleston-Wilkes (Deputy Head of Centre)	07832-199921 (office hours)
Deputy Designated Safeguarding Lead (dDSL)	Jo Muzzell (Project Lead Worker)	07454-561217 (08:30 -4pm, term time)
Trustee with Safeguarding Oversight	Martin Watson (Trustee)	07930-636330

Introduction

Eagle's Nest Project is committed to ensuring good practices are in place and followed to safeguard children, young people and vulnerable adults we encounter as a result of our operations.

The purpose of our Safeguarding & Child Protection Policy is to ensure that we:

- Are committed to developing a robust safeguarding culture of vigilance and challenge.
- Build resilience by raising awareness of safeguarding and child protection issues, and equipping children with the language and skills to keep themselves safe.
- Establish a safe environment in which children can learn and develop within an ethos of openness and where children are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.
- Support vulnerable pupils who have been abused, have witnessed violence towards others or may be vulnerable to abuse.
- Prevent unsuitable people from working with children by ensuring we practice safe recruitment in checking the suitability of all staff, and volunteers to work with our children and maintain an active, ongoing vigilance in line with the safeguarding culture.
- Follow the procedures set out in Working together to Safeguard Children (2026) and Keeping Children Safe in Education (2026)
- To support schools we work with in meeting their DfE requirements placed on them to ensure children placed in alternative provision remain safe from harm

We are a registered charity, (No. 1156196), and as such must comply with requirements outlined by the Charity Commission guidance, *Safeguarding and Protecting People for Charities and trustees* (Updated June 2022).

This document states that it is an essential duty for trustees to take reasonable steps to safeguard beneficiaries and to protect them from abuse. It also states that trustees should, where appropriate, promote the well-being and welfare of the charity beneficiaries as well as taking reasonable steps to protect from harm staff, volunteers and those who come into contact with the charity through its work. Trustees aim to set an organisational culture that prioritises safeguarding, so that it is safe for those affected to come forward and report incidents and concerns with the assurance these will be handled sensitively and properly.

In addition, we have chosen to subscribe to Thirtyone:Eight, who operate as our umbrella organisation for DBS checks, as well as being available to advice and support us with any safeguarding matters, be they in policy or practice.

We are insured for the work we do through ACCESS insurance brokers, specialists in charity work. This includes Public Liability and Professional Indemnity insurance.

The contact details for the charity are:

Registered office: The Old Vicarage, 2 Main Street, Branston, Burton on Trent, DE14 3EX

Telephone number: 01283 830597 (out of hours 07474 576569)

Email: info@eaglesnestproject.org.uk or via the website: www.eaglesnestproject.org.uk

We take seriously the statutory guidance issued by the DfE in the document *Keeping Children Safe in Education,* updated in September 2026, and have ensured our procedures meet these standards. This includes ensuring the following safeguarding systems are explained to all staff during induction:

- Safeguarding and Child Protection Policy and KCSIE 2026
- Relational and Personal Regulation Policy
- Staff Code of Conduct
- Safeguarding response to children who go missing from education
- Role of thDSL -including the identity of the DSL and any deputies

In line with statutory guidance in *Keeping Children Safe in Education* (DfE, 2026), Trustees will ensure that Part 1 of the document is sent electronically, to enable ease of access to the hyperlinks, to all staff to read. We are fully supportive of the work of the Local Safeguarding Children Partnership in areas where our young people reside and, where required, have passed a copy of this policy to them and other organisations, including funding bodies.

We work with an increasing number of young people from other local authorities. Contact details for referrals are given in Appendix C, the final page of this document for ease of access, though we do work with others less local and designated leads are clear that these details can be accessed via internet searches if required.

What We Do

Eagle's Nest Project is a charity set up to provide alternative education solutions for young people on the margins of mainstream. We currently offer small group and 1:1 work aimed at equipping young people to manage their emotions effectively, boosting self-confidence and self-esteem and developing life skills and vocational qualifications alongside improving functional skills.

There are two ways in which 1:1 work may take place. Our mentoring project is staffed by volunteers and is a formal mentoring that takes place either in the home of the young person, their school, or a local public space. All young people who we work with will be vulnerable, and it is likely many will be involved in risk-taking behaviours. We are conscious that in working in the home environment, workers may also come into contact with vulnerable adults in their work. All homes will be visited by the volunteer coordinator prior to sessions taking place as part of a risk assessment process (Appendix A). Clear working practices are in place for this 1:1 work, (Appendix B), and our volunteers are prepared through initial training, then ongoing support and supervision.

We also run bespoke educational packages as interventions. These may be delivered to small groups or 1:1. Each situation is risk assessed to determine practices that provide the best opportunities for the young people involved to develop. Safeguarding matters form a core part of this process.

There are plans to run residential trips for small groups to work on the same key areas discussed above, and our insurance company is kept fully aware of our planned activities as a charity.

Our Commitment

At Eagle's Nest Project we recognise the need to provide a safe and caring environment for children, young people and vulnerable adults. We acknowledge they can be the victims of physical, sexual and emotional abuse, and neglect. We accept the UN Universal Declaration of Human Rights and the International Covenant of Human Rights, which states that everyone is entitled to "all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status". We also concur with the Convention on the Rights of the Child which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from "all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child."

As an organisation Eagle's Nest have therefore adopted the procedures set out in this policy in accordance with statutory guidance. We are committed to building constructive links with statutory and voluntary agencies involved in safeguarding.

The policy and attached practice guidelines are based on advice from documentation published by Thirtyone:Eight, Staffordshire Education Safeguarding Advice Service (ESAS) and Staffordshire Safeguarding Children Partnership https://www.staffsscp.org.uk/

Eagle's Nest Project is committed to:

- Endorsing and following all national and local safeguarding legislation and procedures, in addition to the international conventions outlined above.
- Providing on-going safeguarding training for all its workers, including volunteers, and regularly reviewing our safeguarding procedure.
- Supporting the Designated Safeguarding Lead in their work and in any action they may need to take in order to protect children and vulnerable adults.

What is Abuse and Neglect?

The four definitions of abuse below operate in England based on the government guidance '*Working Together to Safeguard Children*' (March 2026).

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or

in an institutional or extra-familial contexts 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 another child or children.

Physical abuse
Physical abuse 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
Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, though it may occur alone.

Child sexual abuse
Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. in family settings, in institutional settings, online, and technology can be used to facilitate offline abuse. Child sexual abuse material available online may have been generated in a family environment. Online abuse can also take the form of cybergrooming or self-generated sexual content under coercion. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. A child of any age or gender can be a victim of sexual abuse.

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the child needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The child may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

a. provide adequate food, clothing and shelter (including exclusion from home or abandonment)
b. protect a child from physical and emotional harm or danger
c. ensure adequate supervision (including the use of inadequate caregivers)
d. ensure access to appropriate medical care or treatment.
e. provide suitable education

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Contextual safeguarding is a significant consideration for all young people, but at Eagle's Nest we recognise that we work with young people who are more likely than most to have other factors that add significantly to the broader picture of risk in their life. Such contextual factors may include exploitation by criminal gangs and organised crime groups such as county lines and drugs; trafficking; online abuse; FGM and forced marriage; mental health; sexual exploitation and the influences of extremism leading to radicalisation. The definitions below are taken from the glossary of *Working Together to Safeguard Children (2026)*:

County Lines, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons. This activity can happen locally as well as across the UK; no specified distance of travel is required.

Child criminal exploitation, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the child needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The child may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Domestic Abuse - The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse (section 1 of the Act). The statutory definition is clear that domestic abuse may be a single incident or a course of conduct which can encompass a wide range of abusive behaviours, including a) physical or sexual abuse; b) violent or threatening behaviour; c) controlling or coercive behaviour; d) economic abuse; and e) psychological, emotional, or other abuse such as 'honour' abuse, faith- or belief-based abuse, forced marriage, female genital mutilation or reproductive coercion, harassment and stalking. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the Domestic Abuse Act 2021). The definition ensures that different types of relationships are captured, including ex-partners and family members. All children can experience and be adversely affected by domestic abuse in the context of their home life where

domestic abuse occurs between family members, including where those being abusive do not live with the child. Experiencing domestic abuse can have a significant impact on children. Section 3 of the Domestic Abuse Act 2021 recognises the impact of domestic abuse on children (0 to 18), as victims in their own right, if they see, hear or experience the effects of abuse.

We are signed up to Operation Encompass and all parents and carers are informed of this during induction meetings. Trustees and staff are fully aware of this scheme and relevant information is displayed within the centre and on the website.

Extremism is defined in the Prevent strategy as the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces.

Channel Panels are a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led in Staffordshire by the Staffordshire Police Counter-Terrorism Unit. It aims to support at an early stage, people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

Children Missing Education As an organisation, we understand the links between a child going missing, particularly repeatedly, and a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. In addition, we recognise the significance of persistent absence from school and the risk factors this can indicate. We work closely with all referring agencies and ensure they are informed on the day if a student does not attend a session so that the relevant checks on safety and well-being can be made.

In addition, where it appears an educational placement has not been sourced for a child, or they appear to be opting out of the provision that is in place, we take this seriously and report the concern to the on-roll school, or in cases where there is no named school, the Local Authority.

If a child goes missing from our site during a session, we will inform parents/carers and we will report this to the police.

Eagle's Nest works hard to develop positive relationships with all agencies involved to ensure good practice and information sharing in order to safeguard the children in our care. The Charity is aware of recent changes that have come into place on 30th September 2026 outlining the duty to share information.

We work in close partnership with referring schools and communicate any concerns that come to light. Where a new and pressing concern is raised whilst a young person is at Eagle's Nest, we are likely to refer this matter to the relevant authorities ourselves on the day to get a timely response. We will ensure the school are updated about this and copied in on any communications with social care.

We understand that there is a mandatory duty to refer to the relevant Children Services if we become aware of a private fostering arrangement in order for them to check that the arrangement is appropriate, (a private fostering arrangement is one where someone other than a direct relative has the care of a child under the age of 16, under 18 if disabled, for more than 28 days).

Our 9-point plan for Safeguarding

1. Safeguarding Awareness Training

The Trustees are committed to on-going safeguarding training and development opportunities for all workers, (including volunteers), developing a culture of awareness of safeguarding issues to help protect everyone. All our workers will receive induction training that includes details of our Safeguarding and Child Protection Policy and how to apply it, along with completing a recognised level 1 training course every three years. Where workers have completed an appropriate course for another organisation, evidence of certification will be accepted. For others an appropriate course will be completed. In addition to this training, there will be more regular updates via email and also in face-to-face training and supervision sessions on at least an annual basis and all staff in paid roles working face-to-face with young people will complete PREVENT training and have a regular safeguarding slot in the weekly team meeting. The DSL will ensure all staff and volunteers are aware of the early help process and the part they play in it. All trustees complete level 1 training at least every three years. PREVENT training is completed every two years for face-to-face staff. All staff have read and have a good understanding of at least part 1 of Keeping Children Safe in Education 2026 and are aware of the safeguarding link to other policies relating to their daily practice.

In addition, the DSL and deputies will complete Child Protection Lead Training (or equivalent update course) with the relevant Local Safeguarding Children Partnership bi-annually.

Eagle's Nest will also ensure that their workers have up to date information they can pass to children and vulnerable adults stating where to get help and advice in relation to abuse, discrimination, bullying or any other matter where they have a concern. Staff make particular efforts to ensure such information is provided to young people for whom we hold a concern prior to school breaks where there is the potential for a few weeks without natural contact with other agencies.

Staff training includes DfE updates on safety considerations and legal responsibilities if they choose to use Generative AI, as well as awareness of AI risks for children.

2. Prevention - Safer Recruitment

The Trustees will ensure all workers, including volunteers, are appointed, trained, supported and supervised in accordance with government guidance on safe recruitment. This includes ensuring that:

- All recruitment materials include reference to the organisation's commitment to safeguarding and promoting the wellbeing of pupils.
- There is a written job description/person specification for the post.
- Those applying have completed an application form which is scrutinised carefully.

- Those short listed have been interviewed, with safeguarding discussed at interview.
- At least two written references have been obtained and followed up where appropriate.
- Candidates are made aware that the charity will be conducting of online searches as part of due diligence during the recruitment process.
- An enhanced disclosure and barring check has been completed, this process naturally includes a self-declaration and verifying identity, (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information), along with checks with Teaching Regulation Agency checks for all staff in paid roles working directly with children, and a section 128 check for those in management positions.
- Qualifications where relevant have been verified.
- A suitable training programme is provided for the successful applicant.
- The applicant has completed a probationary period.
- The applicant has been given a copy of the organisation's Safeguarding & Child Protection policy and knows how to report concerns, (along with other documents as outlined by KCSIE).

All staffing appointments, including volunteers, undergo this safer recruitment process, this includes trustees The Director of the charity and others involved in regular interviewing will hold a valid 'Safer Recruitment' course certificate as part of our commitment to ensuring we remain up to date in this area and no appointment is made without a staff member who has completed this course being involved in the decision making.

Eagle's Nest Project holds a Single Central Record, in line with expectations of schools, to record all aspects of the safer recruitment process have been successfully completed.

3. Management of Workers – Codes of Conduct

Eagle's Nest is committed to supporting all workers and ensuring they receive support and supervision. All workers have been issued with a Code of Conduct for working with children and young people. This includes the '1:1 Mentoring Framework' which clearly outlines expectations for this work, (Appendix B). The Trustees undertake to follow the principles found within the '*Abuse Of Trust*' guidance issued by the Home Office and it is therefore unacceptable for those in a position of trust to engage in any behaviour which might allow a sexual relationship to develop for as long as the relationship of trust continues.

KCSIE makes clear the importance of keeping track of low-level concerns, sometimes even 'gut feelings' about staff in order to spot patterns that may build over time. Staff are encouraged to report if they have a concern, as well as staff being encouraged to self-refer if they think they have acted in a way that wasn't the best on reflection afterwards. A table is used, (appendix D), to track these concerns with Head of Centre having a discussion with the safeguarding lead trustee when 3 separate concerns have been raised about the same member of staff to discuss the way forward. This is likely to involve an action plan, (appendix E), giving details of further training needs for the staff member to reduce the risk of further low-level concerns being raised. Should the concern relate to the Head of Centre, be that self-referral or report by others, this must be shared with the Safeguarding lead trustee on every occasion.

4. Practice Guidelines – Working Safely

As an organisation working with children and young people we wish to operate and promote good working practice. This will enable Eagle's Nest Project to run activities safely, considering risks appropriately, whilst developing good relationships that minimise the risk of false accusation.

We ensure the site is secure enough to prevent easy access from those who should not be on site. Gates and external doors are kept locked during the day (unless open to give access to the garden) and visitors only enter through the main entrance and after signing in are issued with a visitor's pass. As a small site with high staff ratios, these measures are embedded in culture and the young people are educated about the expectations and risks should they wish to challenge these safety measures.

All activities are risk assessed, and all young people have a profile that highlights specific triggers that may increase risk for them. Those on 1:1 sessions have a more in-depth assessment and there is a risk assessment for staff operating in an environment where physical intervention may be used as part of a response to provide safety for all. Staff are skilled in dynamic risk assessment when managing young people whose behaviours can escalate due to the challenges they face. This is an embedded part of practice, and high staff ratios and positive relationship as seen to be the biggest risk mitigating factors for our cohort.

We will not employ children for any role until they are in at least Year 12. Any role for children aged 16-18 must be carried out after those we work with have left the building, and an adult must be present at all times in the building to ensure employees aged under 18 do not work alone in the building. Work experience placements for under 18s can only take place at times when those we support are not in the building, such as evenings and school holidays. This ensures the ratios and safety for all are not compromised.

5. Communicating Effectively

We gain parental consent for all young people working with us, and it is usual for us to meet with parents/carers at the beginning of our engagement with a young person. All parents/carers are given contact details for the charity so that contact can be made easily should any concerns arise.

Eagle's Nest Project is committed to multi-agency working and understands that good communication is the core element of creating effective relationships that help to safeguard the young people and families with which we work. We are fully signed up to the national Operation Encompass programme and make parents aware of this at induction meetings.

Clear chronological records are kept of safeguarding concerns that have been raised in sessions, including clear details of how this information was acted upon using our student MIS system (Compass)

6. Responding to Allegations of Abuse

We will take all possible steps to safeguard our children and to ensure that the adults in our organisation are safe to work with children. We will always ensure that the procedures outlined in Part 4 of 'Keeping Children Safe in Education', DfE (2026) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO). The LADO in

Staffordshire can be contacted via the LADO referral form. Under no circumstances should a worker carry out their own investigation into an allegation or suspicion of abuse. The person in receipt of allegations or suspicions of abuse should report concerns as soon as possible to the DSL, who is nominated by the Trustees to act on their behalf in dealing with the allegation or suspicion of neglect or abuse, including referring the matter on to the statutory authorities.

In the absence of the DSL and deputies, or, if the suspicions in any way involve them, then the report should be made to the Trustee with safeguarding oversight). If the suspicions implicate both the DSL and the Trustee named above, then the report should be made by contacting Social Services, (see contact details below), or the police on **101** or **0300 111 8007**(Staffordshire).

When the DSL receives a concern, they must respond accordingly. If the child does not already have an allocated social worker or family support worker then in Staffordshire, this will be a call to Staffordshire Families Integrated Front Door Service on 0300 111 8007 (Monday-Thursday, 8.30am-5.00pm and Friday 8.30am-4.30pm) or 0345 604 2886 out of hours. It is also still possible to call the MASH, (Multi-Agency Safeguarding Hub Police Department) by dialling 101 and asking for the MASH team, (details of contact numbers for other local authorities with whom we work are shown in Appendix C).

Suspicions must not be discussed with anyone other than those nominated above. A record of the concern should be made using a safeguarding report on the Compass system in accordance with these procedures. Whilst allegations or suspicions of abuse will normally be reported to the DSL, the absence of the DSL should not delay referral to Social Services and/or the Police. The Trustees will support the DSL in their role and accept that any information they may have in their possession will be shared in a strictly limited way on a need-to-know basis. The role of the DSL is to collate and clarify the precise details of the allegation or suspicion and pass this information on to statutory agencies that have a legal duty to investigate.

We recognise that young people will choose when and to whom they disclose an allegation. As a charity, we want to create a culture that supports all young people to feel safe and able to talk about anything that is concerning them. We understand the importance of treating all young people equally, irrespective of background of belief. We recognise that for some groups, (KCSIE specifically highlights LGBTQ+), it can be more difficult to speak out for fear of judgement and we will proactively work to ensure that all young people can feel safe to raise concerns, knowing they will be taken seriously.

We make every effort to listen to and capture the voice of children to enable us to have a clear understanding of their daily lived experiences. This includes understanding that the child's presenting behaviours and observations by staff also form part of the child's voice.

Where the concern is about a child at risk there are three main groups of perpetrators. These are another child (child-on-child abuse), an adult in the life of the child outside of the organisation or a member of staff from Eagle's Nest project or another organisation. All three of these categories are equally serious and must be responded to as such, though the procedures will be slightly different.

Child-on-child Abuse

Trustees recognise the very serious abuse that can take place between children. This is most likely to include but not limited to: bullying (including cyber bullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, biting, hair pulling or otherwise causing physical harm; teenage relationship abuse; sharing nudes and semi-nudes (including where generated by AI); upskirting and initiating/ hazing type violence and rituals.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing particularly towards girls. Behaviours by children should never be passed off as 'banter' or 'part of growing up'. The DFE states 'child-on-child' abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. It is important that young people reporting an incident are reassured that the law is there to protect rather than criminalise them.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as teenage relationship abuse. Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed. In KCSiE 2026 guidance, reference is made to alleged perpetrator and perpetrator, however we will try to avoid using these terms and instead we will refer to children and young people who have 'displayed' or 'instigated' particular behaviours. Eagle's Nest are committed to finding the right specialist support for all young people involved, including ensuring appropriate support is offered for siblings where intra-familial abuse has occurred.
Eagle's Nest project takes any child-on-child abuse seriously and outlines specific strategies to deal with such behaviour in our anti-bullying policy. Should the child-on-child abuse involve a young person not working with us, we would share information with appropriate adults and agencies to ensure the matter is actioned appropriately. This is likely to involve contacting the police.

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts or 'upskirting' which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing

their genitalia or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Dismissing or tolerating such behaviours risks normalising them.

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way.

In line with recommendations in KCSIE 2026, Eagle's Nest recognises that the most effective preventative methods will be through a holistic approach that prepares pupils for life in modern Britain. Eagle's Nest staff are committed to consistently challenging and responding to inappropriate incidents, demonstrating a clear set of values and standards throughout all aspects of our work. Staff create an environment that helps children to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

We understand we play a crucial role in preventative education preparing children for life in modern Britain creating a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.
Throughout our work, children are supported to develop positive relationships, body confidence and self-esteem, and opportunities to discuss online harms, including the sharing of images, pornography, deepfakes, misogynistic influencers and where to seek help and support if needed, are taken when they arrive, and are delivered specifically where required in response to concerns.

Abuse, (or suspicion of abuse), by an adult in the life of the child

Allegations of Physical Injury, Neglect or Emotional Abuse

If a child has a physical injury, a symptom of neglect or where there are concerns about emotional abuse, the DSL will:

- Contact Children Services for advice in cases of deliberate injury, if concerned about a child's safety or if a child is afraid to return home.
- Not tell the parents or carers unless advised to do so, having contacted Children Services.
- Seek medical help if needed urgently, informing the doctor of any suspicions.
- For lesser concerns, (e.g. poor parenting), encourage parent/carer to seek help, but not if this places the child at risk of significant harm.
- Where the parent/carer is unwilling to seek help, offer to accompany them. In cases of real concern, if they still fail to act, contact Children Services direct for advice.

Allegations of Sexual Abuse

In the event of allegations or suspicions of sexual abuse, the DSL will:

- Contact the Children Services or Police Child Protection Team direct. They will NOT speak to the parent/carer or anyone else.

Allegations of Abuse against a member of staff from Eagle's Nest Project or another organisation

As an organisation, we have a statutory duty to safeguard and promote the welfare of children and to maintain a professional attitude of "***it could happen here"*** where safeguarding is concerned. This is emphasised through staff training to promote a culture that reports any

concerns regarding the behaviour of colleagues or students with whom we work, including staff from other organisations with whom we partner.

Trustees are clear that there is a difference between a complaint about a member of staff, a concern about the quality of care or practice being provided and an allegation. All such incidents will be taken very seriously, but it is important to note what makes an allegation different. An allegation may relate to a person who works with children who has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

If an allegation is made against a worker, (whether a volunteer or paid member of staff), there are additional procedures that must be followed, along with those outlined above. The DSL must report to the Centre Director immediately. The Centre Director, in accordance with Local Safeguarding Children Partnership (LSCP) procedures, will need to liaise with the Local Authority Designated Officer (LADO). The Designated Officer will guide the Director through the process of investigation and help to make decisions about the potential suspension of the worker and whether a referral is also needed to any other agencies, including the Disclosure and Barring Service, supporting with timescales and ensuring these are managed in a fair and appropriate way. Staff for whom an allegation has been made will be offered an independent advocate to support them through the process. **To contact the Designated Officer in Staffordshire use the** LADO referral form

Should the allegation be against staff from another organisation, Eagle's Nest DSL will contact the DSL at that organisation and pass on the concern and will inform them of the intention to contact the relevant LADO of this allegation. It may be appropriate to allow the other organisation to contact their LADO first, but a clear timescale should be set, and Eagle's Nest must also make this call to ensure appropriate follow-up has occurred.

The Director must also inform the insurance company and the Trustee with Safeguarding Oversight

In any of the scenarios above, if the DSL is not sure whether to make a referral, they must act on the side of caution by making a referral.

Eagle's Nest takes very seriously the safety of children in our care and embeds a reflective practice into all aspects of our work. Lessons learnt activities will be carried out for all allegations, irrespective of outcome and low-level concerns will be recorded in order to ensure patterns of behaviour previously unidentified are not missed.

What is a low-level concern?
Low level does not mean that the concern is insignificant. It is any concern, no matter how small, and even if no more than causing a sense of unease or nagging doubt that an adult working in or on behalf of the school may have acted in a way that is:

· inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and

· does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:
· being over friendly with children;
· having favourites;
· taking photographs of children on their mobile phone, contrary to charitypolicy;
· engaging with a child in a deliberately secluded area; or
· humiliating pupils.

All staff have a good understanding of what constitutes a low-level concern, and our Trustees ensure that these low-level concerns are included as part of our staff code of conduct and safeguarding policies.

It is, of course, the right of any individual as a citizen to make a direct referral to the safeguarding agencies or seek advice from Thirtyone:Eight, although the Trustees hope that employees will use this procedure. If, however, the individual with the concern feels that the DSL has not responded appropriately, or where they have a disagreement with the DSL(s) as to the appropriateness of a referral they are free to contact an outside agency direct or to make use of the NSPCC Whistleblowing Advice Line which is specifically set up for staff who do not feel able to raise concerns regarding child protection failures internally. The service is available by calling 0800 028 0285 or emailing help@nspcc.org.uk. We hope by making this statement that the Trustees demonstrate their commitment to effective safeguarding and the protection of all those who are vulnerable.

Procedures for Concern about the vulnerability of an Adult:
Whilst Eagle's Nest Project works with young people, it is recognised that the supporting work with families may lead to situations where concerns arise regarding vulnerable adults. Should a concern be raised about an adult, for example a parent or carer, this should be reported to the DSL who will make a decision about whether this is a concern because it puts the child at risk, or a concern solely for the vulnerability of the adult. This will determine how the concern is actioned. The Adult Safeguarding Partnership can be contacted in Staffordshire on 0345 604 2719 or 0345 604 2886 out of hours should this be the most appropriate action, (for other Local Authorities the relevant number will need to be sourced).

Eagle's Nest seek to work with families as part of a support package around them and wants to help families in accessing support, for example through an Early Help Assessment. We are committed to multi-agency working and recognise the importance of this in safeguarding the children we work with.

7. Care for Staff
Eagle's Nest Project recognises that dealing with issues of a child protection or vulnerable adult nature can be distressing for staff and is therefore committed to supporting staff through extended supervision and signposting to additional support should this be requested. This includes access to clinical psychology support following distressing disclosures or incidents, along with signposting to the education support helpline.

8. Managing Those Who Pose a Risk

Due to the nature of the work of Eagle's Nest Project it is right that we have robust safeguarding procedures, including for the recruitment of all staff, both paid and voluntary. As an organisation we also want to ensure that in implementing these important safeguards, we do not unfairly discriminate against those with a criminal record. The importance of policy in connection with the employment of people with a criminal record is being recognised as good practice in the area of equal opportunities and diversity in the work place. We have therefore developed a policy titled 'Employment of Staff with a Criminal Record' which explains how we aim to balance risk to our organisation and those we support with providing opportunities for those who have turned their lives around.

In addition, we recognise that we could come into contact with those who pose a risk to our students when carrying out activities in a public place or rented space. We will complete risk assessments to ensure we have considered interactions with those not known to us, for example, members of the public using the same toilets as our students when out and about.

9. Working in Partnership

The diversity of organisations and settings means there can be great variation in practice when it comes to safeguarding children, young people and vulnerable adults. This can be because of cultural tradition, belief and religious practice or understanding, for example, of what constitutes abuse. We therefore have clear guidelines in regard to our expectations of those with whom we work in partnership, whether in the UK or abroad. We will discuss with all partners our safeguarding expectations.

Good communication is essential in promoting safeguarding, both to those we wish to protect, to everyone involved in working with children and vulnerable adults and to all those with whom we work in partnership.

This Safeguarding and Child Protection Policy is just one means of promoting safeguarding. Other policies, such as 'Health and Safety', 'Employment of Staff with a Criminal Record', 'Staff Code of Conduct' and 'Anti-Bullying Policy' form part of the broader picture, along with ensuring this policy is reviewed regularly in line with the latest government advice and guidance. This policy will be reviewed annually.

Appendix A – Risk Assessment for Home Visit

Home Visiting Risk Assessment

Family Name	Address	Contact Details
Date completed:	By Whom:	

	Yes	No
Have any risk been identified by school/ any other agency?		
Are the entrances /exits to the property easily accessible?		
Is there an appropriate downstairs room where the mentor could meet the		
Do parents understand that there must be an adult home if their child is seen in the house?		
Are there pets in the household, are they threatening?		
Are you aware of any intimidating /threatening clients, relatives or friends living at or likely to visit the property?		
Are there any other dangers/hazards associated with the property?		
Are you confident all safety measures are in place?		
Do you think mentoring sessions can go ahead in the house?		

Areas of concern	
Action (s) to eliminate/reduce risk?	By Whom?

Date of discussion with Mentor (Date)	**Joint Decision**: Meet at House / Don't meet at house
Mentor Signature	Coordinator Signature

Appendix B – The 1:1 Mentoring Framework - Seeking to Remain Above Reproach

Safeguarding children and young people in our care is a crucial responsibility of all who work on behalf of Eagle's Nest. The summary below provides a framework that protects you and the young person. It is also very important to have read the much more detailed **Code of Conduct for staff** and **Safeguarding and Child Protection Policy.** As a mentor, you are entering into a position of trust with the mentee. This is a legal status, and it is essential you understand the significance of this.

1. **Always wear your Eagle's Nest ID Badge, no matter how long you have been seeing the mentee.** This helps onlookers to see that you have an official role, including Police and Education Welfare who may well stop a young person seen in a public place during the school day.
2. **Always follow school safeguarding procedures regarding signing in etc when meeting your child at school.** We want to maintain a good reputation as people who understand, support and value good safeguarding measures because we believe the welfare of young people is important.
3. **When meeting with your mentee, ensure the meeting space is appropriate.** There are three possible options, and whichever option you choose should have been agreed with the coordinator and the child's parents prior to each session.

   a) In School – ensure that you feel comfortable with the space being offered. If there is not a glass panel in the door, or if it is obscured, leave the door open. If possible, one of you should be seated so that they are visible from outside the door.

   b) In the Mentees Home – Meet in a downstairs room, with the door open. Do not go into a young person's bedroom under any circumstances. There must be an adult present in the house throughout the session. (RA to be discussed and signed by Mentor prior to meeting in the home)

   c) In a Public Place – Think sensibly about where you choose to sit/go and what it might look like to others.
4. **Mentoring sessions must never take place in your home.**
5. **You must not communicate with mentees via social media networks** such as Snapchat, Instagram, TikTok or other similar methods of communication. Mentees will be used to adults telling them they cannot communicate in this way.
6. **A WhatsApp group that includes you, the young person, parent/carer and Mentor Coordinator creates a safe and transparent way to communicate with your mentee.** This enables you to communicate with your mentee, thus developing trust with the parents/carers aware of all communication, helping to support clear boundary setting and protect you from allegations. **If a WhatsApp group is not established, communication must be direct with parents.** There are

many reasons this is not ideal as time progresses. If there is a reason not to use the WhatsApp group system, please speak to the volunteer coordinator about this.

7. **If communicating via email, to either the parents or the mentee, the coordinator should always be copied in** (cc) so as to protect you from allegations. Think carefully about the language you use in written communication and **avoid the use of 'x' to represent kisses at the end of a message**, using instead a smiley face if you so wish.
8. **Do not take pictures of your mentee on your personal phone or camera**. Arrange to borrow a charity camera if you wish to take pictures on an activity or get the young person to use their own phone to do this.
9. **Mentors must carefully consider any physical contact with their mentee**. There are likely to be times when this is appropriate, such as to comfort a mentee who is upset or to offer congratulations when a big milestone is achieved. Mentors should use their judgement to reassure or congratulate a mentee in an age-appropriate way whilst maintaining clear professional boundaries. Physical contact should be brief and young person led.
10. **Mentors must carefully consider the giving of gifts, and this should be discussed with the coordinator in advance.** Generosity is a great thing but could be perceived as grooming if misinterpreted by others.
11. **Mentors must understand the importance of not promising to keep secrets**. Building a trusted relationship is a key focus of this project but this must not be at the cost of protecting a young person from possible harm.
12. **Mentors must not meet with their mentee outside the agreed mentoring session** without the prior permission of both the parents and the coordinator.
13. **Do not let your mentee know your address**. It may be that this information comes out at some point in the year, for example they may see you entering your house and tell you, but this is not information that should be offered freely. In this way you help the young person to maintain clear boundaries and safeguard them (and you) from misinterpreting the relationship.
14. **Mobile phones must remain switched on, not on silent, during a mentoring session**. This is so that parents of the mentee or the coordinator can easily contact you if needed. Mentors are encouraged to set boundaries in this regard with the mentee. (e.g. I will only respond to a phone call from your parent or from EN Team, I will be ignoring other messages and calls, are you happy to do the same).
15. **Never give medication of any form to your mentee**. This includes simple paracetamol even if they have a headache and you have seen the parents administer it previously when at the house.
16. **Mentees must not travel in your car unless written consent has been sought from the parent/guardian and the coordinator is aware prior to the journey occurring**, (this can include a text message or email if convenient). The car must have business insurance and be roadworthy with current tax and MOT. It is not acceptable to offer lifts to your mentee outside of the mentoring session.

This framework is there to support you in your work and to safeguard you and your family, your mentee and Eagle's Nest as an organisation. There will always be situations that fall outside of these guidelines, and where these occur, Eagle's Nest want to protect you as a valuable volunteer from being overburdened with the responsibility to make such decisions. Therefore, in all cases, scenarios not covered by this framework should be referred to the volunteer coordinator. Should anything occur during a session which leads you to feel as if you acted outside of, (or very nearly outside of), this framework, it is vital that this is reported to the coordinator or the out of hours number at the earliest opportunity. It is likely Parents/carers of the mentee will then be contacted to proactively address concerns.

Appendix C – Contact Details for Raising Safeguarding Concerns with Local Authorities

Referrals are always made to the authority within which the young person resides. As the organisation grows, we are increasingly working with young people from a range of local authorities. The contact details below are for local authorities with whom we work. This is not an exhaustive list, and on occasion, it may be necessary to find details of other relevant teams.

Staffordshire
0300 111 8007 (Monday-Thursday, 8.30am-5.00pm and Friday 8.30am-4.30pm) or 0345 604 2886 out of hours
Stoke
01782 235100 (Monday-Friday 8.30am-6.00pm) or 01782 234234 out of hours

Derbyshire
01629 533190 (Monday-Friday 9.00am-5.00pm) or 01629 532600 out of hours
Derby City
01332 641172 (Monday-Friday 9.00am-5.00pm) or 01332 956606 out of hours
Leicestershire
0116 305 005 (24-hour number)
Nottingham City Council
0115 876 4800 (Monday to Friday at 8:30 am to 5:00 pm) or 24hr in an emergency
Nottinghamshire
0300 500 80 90 (Monday to Friday 08:30-17:00) or 24hr in an emergency 0300 456 4546

To contact the MASH team in any area, dial 101 and ask for the local authority you need. Once connected to the correct authority, ask for the MASH team.

Appendix D – Low Level Concern Log with examples

Recording of Low-Level Concerns

KCSIE makes clear the importance of keeping track of low-level concerns, sometimes even 'gut feelings' about staff in order to spot patterns that may build over time. Staff are encouraged to report if they have a concern, as well as staff being encouraged to self-refer if they think they have acted in a way that wasn't the best on reflection afterwards. The table below should be used to track these concerns with Head of Centre having a discussion with the Safeguarding lead trustee when 3 separate concerns have been raised about the same member of staff to discuss the best plan of action at this point. This is likely to include a discussion around further training needs for the staff member to try to prevent further low-level concerns being raised. Should the concern relate to the head of centre, be that self-referral or report by others, this must be shared with the Safeguarding lead trustee on every occasion.

Date	Staff member	Details	Reported by	Recorded by	Action
07/03/24	Miss Example	Mr W heard yp ask Miss E for their social media name so they could see each others' holiday photos. Miss E told yp their social media name.	Mr W	Mr Z (dDSL)	N/A - Example
25/10/24	Mr Example	X felt Mr E used a harsh tone and was very negative and not in line with our relational policy in approach to yp, causing yp to shrink back and appear intimidated.	X	Miss Y (DSL)	N/A - example

Appendix D – Sample Action Plan Following a number of Low-Level Concerns being raised

Low Level Concern Action Plan

When three low level concerns have been logged for a member of staff, the Director will discuss an action plan with the lead trustee for safeguarding to look at the best ways to ensure any training issues or needs are addressed to prevent further concerns being raised.

Whilst further concerns may escalate the process as outlined in code of conduct, this remains a low-level process and is in place to support the staff member to move forward positively. This document is therefore simply for record-keeping purposes.

Staff Member: Date:

Action	Review
Example - To attend 1:1 meeting with Head of Centre to complete reflection and training activities	after 8 meetings
Example - To attend 2 hr online training session linked to a relevant issue	After training completed

Document shared and viewed date:

meeting dates (action 1):

Review of plan date:

Comments and next steps: