



Safeguarding Children Policy

Written: August 2026

Approved by: Directors

Policy owner: Designated Safeguarding Lead / Safeguarding Manager

Review frequency: At least annually, or sooner where there are changes to legislation, statutory guidance, local safeguarding arrangements or organisational practice.

1. Purpose and Scope

1.1 Purpose

Your Space Foundation CIC is committed to safeguarding and promoting the welfare of every child and young person with whom we come into contact.

We recognise safeguarding as a shared responsibility that includes providing appropriate help and support, identifying and responding to abuse, neglect and exploitation, and acting where there are concerns about a child's safety or welfare.

As an organisation providing counselling, therapeutic support and other services to children and families, we recognise that children may communicate experiences or concerns within therapy that they have not previously shared with another adult. Practitioners are expected to remain professionally curious and attentive to the child's wider lived experience while respecting the purpose, boundaries and integrity of the therapeutic relationship.

The welfare and safety of the child will remain central to safeguarding decision-making.

1.2 Scope

This policy applies to everyone working for or on behalf of Your Space Foundation CIC, including directors, employees, associates, therapeutic practitioners, trainees and students, supervisors, volunteers, contractors and consultants.

For the purposes of this policy, a child is anyone who has not yet reached their 18th birthday.

The policy applies to safeguarding concerns arising through all aspects of Your Space Foundation's work, including face-to-face and remote services, work within schools and partner organisations, group and community activities, digital communication, and information received from children, families, professionals or other third parties. It also applies where concerns about a child who is not receiving a Your Space Foundation service become known to us through our work.

Where Your Space Foundation practitioners work within another organisation or setting, they must work appropriately within that organisation's safeguarding arrangements as well as this policy.

The existence of another organisation's safeguarding procedures does not remove an individual's responsibility to take appropriate action to safeguard a child. Where there is uncertainty about the appropriate procedure, advice must be sought from the Your Space Foundation Designated Safeguarding Team.

2. Policy Statement

Your Space Foundation believes that every child has the right to be safe, to be heard and to receive appropriate help, support and protection when they need it. Safeguarding is everyone's responsibility.

Your Space Foundation will:

- place the child's welfare, safety, lived experience, wishes and feelings at the centre of safeguarding practice;
- recognise and respond appropriately to abuse, neglect, exploitation and other forms of harm, including harm occurring within relationships, communities and digital environments;
- work inclusively and remain alert to additional vulnerabilities and barriers that may affect a child's safety, communication or ability to access support;
- respond promptly and proportionately to concerns, sharing information lawfully and working with families and other agencies where appropriate and safe;
- maintain effective safeguarding arrangements, including appropriate recording, professional boundaries, safer working practices, training, supervision and safeguarding consultation; and
- respond appropriately to concerns about adults working with children and learn from safeguarding incidents, reviews, complaints and emerging evidence.

Safeguarding decisions will be based on the information available at the time and informed by professional judgement, consultation and, where appropriate, multi-agency working.

Practitioners are not responsible for investigating suspected abuse or determining whether abuse has occurred. Their responsibility is to notice, listen, record, consult, share and act in accordance with this policy.

2.1 Safeguarding within therapeutic practice

Your Space Foundation recognises that safeguarding and effective therapeutic practice are complementary responsibilities.

Children need therapeutic relationships in which privacy, trust and emotional safety are respected. However, confidentiality does not prevent appropriate safeguarding action where a child may need help or protection.

Practitioners must use professional judgement, taking account of the child's circumstances, wishes and feelings, the nature and context of the concern and the potential for harm. Where the appropriate response is unclear, they must consult the Designated Safeguarding Team.

Detailed arrangements for safeguarding within therapeutic practice, confidentiality, information sharing and referral are set out later in this policy.

3. Legal and Statutory Framework

Your Space Foundation's safeguarding arrangements are informed by relevant legislation, statutory guidance, professional standards and local multi-agency safeguarding arrangements in England.

This policy should be read and applied with reference to the most current versions of applicable legislation and guidance.

3.1 Key legislation

The legal framework relevant to Your Space Foundation's safeguarding responsibilities includes:

- **Children Act 1989**, including section 17 (children in need) and section 47 (children suffering or likely to suffer significant harm);
- **Children Act 2004**;
- **Children and Social Work Act 2017**;
- **Children's Wellbeing and Schools Act 2026**;
- **Sexual Offences Act 2003**;
- **Crime and Policing Act 2026**, including provisions relating to the mandatory reporting of specified child sexual offences, subject to commencement;
- **Domestic Abuse Act 2021**;
- **Female Genital Mutilation Act 2003**, as amended;
- **Modern Slavery Act 2015**;
- **Safeguarding Vulnerable Groups Act 2006**, as amended;
- **Protection of Freedoms Act 2012**;
- **Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)**;
- **Equality Act 2010**; and
- **Human Rights Act 1998**.

Other legislation will apply where relevant to the circumstances of an individual safeguarding concern.

3.2 Statutory and national safeguarding guidance

Your Space Foundation's safeguarding practice is informed principally by Working Together to Safeguard Children 2026, the statutory guidance governing multi-agency arrangements to help, support and protect children in England.

Although Keeping Children Safe in Education 2026 (KCSIE) applies specifically to schools and colleges, Your Space Foundation works within and alongside education settings and adopts relevant KCSIE safeguarding principles and expectations within its organisational practice.

Practitioners working within schools or colleges must follow the safeguarding arrangements of the education setting alongside this policy. Where there is uncertainty or conflict between procedures, the safety and welfare of the child must remain paramount and advice should be sought from the Your Space Foundation Designated Safeguarding Team.

Your Space Foundation will review relevant changes to statutory and national safeguarding guidance and update its policy and practice as required.

3.3 Information sharing and data protection

Your Space Foundation will share safeguarding information lawfully, securely and proportionately and will comply with applicable statutory information-sharing duties and guidance.

Data protection legislation and professional confidentiality do not prevent appropriate information sharing where this is necessary to safeguard or promote the welfare of a child.

Consent is not always required for safeguarding information sharing. Significant decisions to share or withhold information should be appropriately recorded.

Detailed requirements concerning confidentiality, consent and information sharing are set out in Section 9.

3.4 Local safeguarding arrangements

Your Space Foundation will work in accordance with relevant local multi-agency safeguarding arrangements and procedures in the areas in which services are delivered.

The organisation will maintain access to current safeguarding contacts and referral routes. Where a child lives outside an area in which Your Space Foundation routinely works, the appropriate local authority safeguarding arrangements will be identified.

3.5 Professional standards

Counsellors, psychotherapists and other professionally registered or accredited practitioners must also work in accordance with the ethical and professional requirements of their relevant professional body.

Professional confidentiality does not override legal or ethical responsibilities to safeguard children. Where there is uncertainty, practitioners must seek appropriate safeguarding, professional or legal advice.

4. Safeguarding Principles

Your Space Foundation's approach to safeguarding is child-centred, trauma-informed and grounded in the understanding that safeguarding is everyone's responsibility.

4.1 The child's welfare and voice are central

The safety, welfare and best interests of the child will remain central to safeguarding decisions.

Children should be listened to and their views, wishes and feelings taken seriously. Practitioners should communicate in ways appropriate to the child's age, development, understanding and communication needs, recognising that children may communicate their experiences through words, behaviour, relationships, play, creative expression or changes in presentation.

Wherever appropriate and safe, children should understand what is happening when safeguarding concerns arise, what information may need to be shared and what is likely to happen next.

4.2 Safeguarding begins before child protection

Safeguarding is not limited to situations where a child is suffering or likely to suffer significant harm. Practitioners should remain alert to emerging needs, vulnerabilities and patterns of concern and consider whether additional help or support may be required.

Concerns should be considered cumulatively. Practitioners must not wait for certainty, a direct disclosure or evidence of significant harm before seeking safeguarding advice.

Safeguarding responsibilities may also arise where information received through Your Space Foundation's work raises concerns about the safety or welfare of an unborn child.

4.3 Professional curiosity and context

Practitioners should remain professionally curious and consider the child's wider lived experience rather than focusing solely on an individual incident, behaviour or disclosure.

This includes considering relevant family, relationship, peer, educational, community and digital contexts; patterns or changes over time; protective factors; and what may be increasing vulnerability or risk.

Professional curiosity does not mean investigating suspected abuse. Investigation is the responsibility of the appropriate statutory agencies.

4.4 Inclusive and anti-discriminatory practice

Your Space Foundation is committed to inclusive and anti-discriminatory safeguarding practice.

Practitioners should recognise that discrimination, inequality, disability, communication needs and aspects of a child's identity or circumstances may affect the harm they experience, their ability to access support or communicate concerns, and whether they are heard, understood and protected.

Practitioners are expected to reflect on their own assumptions and challenge discriminatory practice where it may affect a child's welfare or safeguarding response.

4.5 Relational and trauma-informed safeguarding

Children are more likely to communicate concerns when they experience adults as safe, trustworthy and emotionally available. Wherever possible, safeguarding action should preserve the child's dignity, agency and sense of safety.

A trauma-informed approach does not mean avoiding necessary safeguarding action. Where action is required, practitioners should consider how it can be undertaken in a way that minimises unnecessary distress and maintains appropriate support for the child.

Parents and carers should ordinarily be involved openly and respectfully where this is appropriate and safe. The child's safety remains paramount, and parents or carers should not be informed where doing so may increase risk or undermine safeguarding action.

4.6 Shared responsibility

Safeguarding is a shared responsibility and significant safeguarding concerns should not be managed by practitioners in isolation.

Practitioners are expected to recognise and respond to concerns within the boundaries of their role, seek safeguarding consultation where required, share information appropriately and contribute to multi-agency safeguarding processes.

Seeking safeguarding consultation is an expected part of safe professional practice.

5. Roles and Responsibilities

Effective safeguarding requires clear accountability throughout Your Space Foundation. Everyone working for or on behalf of the organisation has an individual responsibility to safeguard children, with additional responsibilities held by the Directors and Designated Safeguarding Team.

5.1 Directors

The Directors retain overall responsibility for ensuring that Your Space Foundation has effective arrangements to safeguard and promote the welfare of children.

They are responsible for ensuring that safeguarding is embedded within organisational governance and culture; appropriate policies, procedures, safer recruitment and training

arrangements are maintained; safeguarding risks are appropriately managed; and sufficient resources and oversight are available to support effective safeguarding practice.

Operational safeguarding responsibilities may be delegated, but overall organisational accountability remains with the Directors.

5.2 Designated Safeguarding Team

Your Space Foundation's safeguarding leads are:

Designated Safeguarding Lead (DSL) / Safeguarding Manager:
Deena Singh

Deputy Designated Safeguarding Lead (Deputy DSL):
Felicity Botterill

The DSL has lead operational responsibility for safeguarding and child protection within Your Space Foundation. The Deputy DSL supports this role and is authorised to undertake the responsibilities of the DSL where required, including where the DSL is unavailable or it would be inappropriate for them to be involved.

The Designated Safeguarding Team is responsible for providing safeguarding advice and consultation; supporting appropriate decision-making, referrals and information sharing; maintaining oversight of safeguarding concerns and records; liaising with statutory agencies and partner organisations; identifying patterns and cumulative concerns; supporting professional challenge and escalation; and promoting organisational learning and development.

The DSL and Deputy DSL will maintain appropriate safeguarding knowledge and training and must be provided with sufficient authority, time, information and organisational support to fulfil their roles.

Where neither is available, this must never prevent necessary action to safeguard a child. Practitioners must contact children's social care, police or emergency services directly where required and inform the Designated Safeguarding Team as soon as reasonably practicable.

5.3 Responsibilities of all practitioners, staff and volunteers

Everyone working for or on behalf of Your Space Foundation must understand and follow this policy, complete required safeguarding training and remain alert to concerns about children's safety and welfare.

They are responsible for listening to and taking children seriously, maintaining appropriate professional boundaries, understanding the limits of confidentiality, reporting and recording safeguarding concerns within required timescales, sharing relevant information appropriately and seeking safeguarding consultation where necessary.

Practitioners must take immediate action where a child is in immediate danger and raise concerns about the conduct or suitability of adults working with children.

A practitioner does not require permission from the DSL or another manager to contact children's social care or police where they believe this is necessary to protect a child.

5.4 Additional responsibilities within therapeutic practice

Counsellors, psychotherapists and other therapeutic practitioners must ensure that children understand confidentiality and its limits in a developmentally appropriate way and remain attentive to safeguarding information arising within therapeutic work.

Practitioners must distinguish between therapeutic exploration and safeguarding investigation, consider patterns and cumulative concerns, maintain appropriate clinical and safeguarding records and ensure that therapeutic confidentiality does not prevent necessary safeguarding action.

Clinical supervision supports safe therapeutic practice but does not replace safeguarding consultation. Where a safeguarding concern requires action, practitioners must not delay reporting or consultation until their next clinical supervision.

Trainees and students have the same responsibility to recognise and report safeguarding concerns but must not manage significant safeguarding concerns independently.

5.5 Working within schools and partner organisations

Where Your Space Foundation personnel work within a school, college or partner organisation, they must understand and work appropriately within the setting's safeguarding arrangements alongside this policy.

Relevant safeguarding concerns must also be communicated through Your Space Foundation's safeguarding arrangements. Working within another organisation does not remove Your Space Foundation's safeguarding responsibility for the services it provides.

Where responsibility for action is unclear or organisational procedures appear to conflict, practitioners must seek safeguarding advice. The child's safety must not be compromised by uncertainty about organisational responsibility.

5.6 Concerns about safeguarding leadership and escalation

Where a concern or allegation relates to Deena Singh, it must be reported directly to Felicity Botterill. Where it relates to Felicity Botterill, it must be reported directly to Deena Singh. No individual may oversee or make decisions about a safeguarding concern or allegation relating to themselves.

Where both the DSL and Deputy DSL are implicated, neither can appropriately manage the matter, or internal reporting would be inappropriate or insufficient to protect a child, the

concern must be raised directly with the appropriate external safeguarding or statutory body.

This may include seeking advice from the relevant Local Authority Designated Officer (LADO) where the concern relates to a person working with children, and contacting children's social care or police where appropriate.

Practitioners have a responsibility to challenge and escalate where they remain concerned that a child's needs or risks have not been adequately recognised or addressed. This may include further discussion with the Designated Safeguarding Team, use of local professional disagreement procedures, direct contact with statutory agencies or use of Your Space Foundation's whistleblowing arrangements.

Professional disagreement, internal organisational concerns or the unavailability of a safeguarding lead must never delay action necessary to protect a child.

6. Understanding and Recognising Abuse, Neglect, Exploitation and Wider Safeguarding Concerns

Safeguarding concerns can arise through a single incident, an ongoing pattern or an accumulation of concerns, and children may experience several forms of harm simultaneously.

Harm may occur within families, relationships, peer groups, education or community settings, organisations or digital environments and may be caused by adults or other children.

Children do not always recognise that their experiences are abusive or harmful and may not communicate concerns through a clear disclosure. Apparent participation or consent does not necessarily mean that a child is free from coercion, manipulation, exploitation or an imbalance of power.

Practitioners are not responsible for proving that abuse has occurred. Where information creates a safeguarding concern, they must respond in accordance with this policy.

6.1 Abuse and neglect

The four recognised categories of child abuse are physical abuse, emotional abuse, sexual abuse and neglect. These may occur independently or overlap.

Physical abuse involves intentionally causing physical harm to a child and includes circumstances in which illness or symptoms are fabricated or induced.

Emotional abuse is the persistent emotional maltreatment of a child which causes, or may cause, serious adverse effects on their emotional development. It may include persistent rejection, humiliation, intimidation, coercion, unreasonable expectations or exposure to the ill-treatment of others.

Sexual abuse involves forcing or enticing a child to take part in sexual activities and may involve physical contact or non-contact activity, including abuse facilitated through digital technology. Sexual abuse may be perpetrated by adults or other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs where this is likely to result in serious impairment of their health or development.

Practitioners should distinguish between neglect and poverty or material hardship, which may increase pressures on families but should not themselves be treated as evidence of neglect.

6.2 Domestic abuse

Children can be victims of domestic abuse in their own right where they see, hear or experience its effects and are related to either the person experiencing or perpetrating the abuse.

Domestic abuse may include physical, sexual, emotional, psychological or economic abuse and controlling or coercive behaviour. Practitioners should consider its impact on the individual child, including where they have not directly witnessed a particular incident.

6.3 Exploitation and extra-familial harm

Children may experience harm outside their family home, including within peer groups, intimate relationships, schools, communities, organised groups and online environments.

This may include child sexual exploitation, including group-based exploitation, child criminal exploitation, trafficking, serious violence, coercion and other forms of extra-familial harm. Exploitation involves an imbalance of power and may be present even where a child's involvement appears voluntary or where the child has committed an offence.

Practitioners should consider the relationships, environments and systems surrounding the child, including where power sits, what may be increasing vulnerability and what protective relationships or factors are available.

6.4 Child-on-child abuse and harmful sexual behaviour

Children can abuse other children, both face-to-face and online. This may include physical abuse, bullying, sexual violence or harassment, harmful sexual behaviour, relationship abuse, coercion, exploitation and technology-facilitated harm.

Child-on-child abuse must not be dismissed as banter, experimentation or an inevitable part of growing up. At the same time, behaviour should be understood developmentally and contextually, with consideration given to factors including consent, power, coercion, frequency and impact.

Sexual behaviour in children exists on a developmental continuum. Concerns about potentially harmful or abusive sexual behaviour must be discussed with the Designated

Safeguarding Team, with consideration given to the safety, safeguarding and support needs of all children involved, including children who have experienced harm and children whose behaviour may have harmed others.

6.5 Online and technology-facilitated harm

Children's online and offline lives are interconnected. Technology may provide the environment in which harm occurs or facilitate harm occurring elsewhere.

Online safeguarding concerns may include grooming, exploitation, bullying, coercion or extortion, sexual harm, controlling behaviour, exposure to harmful content, radicalisation and abuse involving artificial intelligence or manipulated content.

Practitioners should consider children's digital experiences where these are relevant to understanding their safety and wellbeing.

6.6 Specific safeguarding concerns

Practitioners must remain alert to specific forms of harm including modern slavery and trafficking, female genital mutilation (FGM), forced marriage, abuse linked to honour, faith or belief, and radicalisation.

FGM is illegal and constitutes child abuse. Concerns that a child may be at risk must be reported immediately through Your Space Foundation's safeguarding procedures, alongside any specific statutory reporting duty applicable to the practitioner's professional role.

A child cannot consent to marriage in England and Wales. Concerns about forced marriage must be managed carefully and family or community members must not be approached where doing so could increase risk.

Concerns about radicalisation should be considered in the context of the individual child and may require safeguarding action, including consideration of Prevent and Channel arrangements where appropriate.

Culture, religion, faith, belief or family honour must never be used to justify abuse.

6.7 Additional vulnerability, cumulative and hidden harm

Any child can experience abuse, neglect or exploitation. Some children may face additional vulnerability or barriers to being heard, understood or supported, including children with disabilities or additional needs, children in care or kinship care, young carers, children experiencing disrupted education or housing, and children affected by discrimination, domestic abuse, exploitation or other adversity.

These circumstances do not themselves indicate that abuse is occurring. Practitioners must consider the individual child's lived experience, protective factors and barriers to accessing help.

Changes in a child's emotional wellbeing, behaviour or mental health may sometimes indicate abuse, neglect, exploitation or other harm. Mental health support does not replace safeguarding action where safeguarding concerns are also present.

Safeguarding concerns should be considered cumulatively and across time and settings. Children experiencing harm may continue to attend school, engage in therapy and appear outwardly to cope.

The absence of a clear disclosure or obvious indicators must never be the sole reason for deciding that no safeguarding concern exists. Where uncertainty remains, practitioners must seek safeguarding consultation.

7. Responding to Safeguarding Concerns and Disclosures

Everyone working for or on behalf of Your Space Foundation has a responsibility to respond appropriately when information raises concern about the safety or welfare of a child.

Concerns may arise through something a child says or communicates, practitioner observation, information from another person, therapeutic work, digital communication, or an accumulation or pattern of concerns.

Practitioners do not need proof that abuse, neglect or exploitation has occurred before raising a safeguarding concern. Their role is to recognise, respond, record, report and contribute relevant information, not to investigate suspected abuse.

7.1 Immediate safety

The practitioner's first consideration must be the immediate safety and welfare of the child and any other child who may be at risk.

Where a child is in immediate danger or requires urgent medical attention, emergency services must be contacted without delay. Where urgent police assistance is required, the police should be contacted.

The need to consult the Designated Safeguarding Team must never delay emergency action necessary to protect a child.

7.2 Responding to a disclosure

Where a child communicates that they are being harmed, have been harmed or are worried about themselves or another child, they must be listened to carefully and taken seriously.

Practitioners should remain calm, allow the child to communicate at their own pace and use open, non-leading prompts only where clarification is necessary. They should not investigate, repeatedly question the child, express disbelief or judgement, ask for unnecessary detail, or promise secrecy or outcomes that cannot be guaranteed.

Disclosure may be gradual, partial or indirect and may occur through behaviour, play or creative expression as well as words. A child withdrawing, minimising or changing what they have said does not necessarily mean that the original information was untrue.

Children should not be unnecessarily required to repeat potentially traumatic information for internal reporting purposes. The practitioner receiving the information should make an accurate record and report the concern appropriately.

7.3 Reporting concerns

All safeguarding concerns must be reported to the Designated Safeguarding Team as soon as reasonably practicable and on the same working day that the concern arises or becomes known.

Child protection concerns must be reported immediately. This includes circumstances where there is reason to suspect that a child is suffering, or is likely to suffer, significant harm or where immediate protective action may be required.

Where email is used to report an immediate child protection concern, the practitioner must ensure that the concern has been received and use an alternative safeguarding or statutory route if timely confirmation cannot be obtained.

The Designated Safeguarding Lead is Deena Singh and the Deputy Designated Safeguarding Lead is Felicity Botterill.

Practitioners must not delay reporting until clinical supervision, a team meeting or another working day. Where neither safeguarding lead can be contacted and action is required, practitioners must contact children's social care, police or emergency services directly as appropriate. Permission from the DSL is not required where direct action is necessary to safeguard a child.

7.4 Safeguarding consultation and decision-making

Not every safeguarding concern will require referral to children's social care. Safeguarding consultation should consider the child's circumstances and lived experience, their wishes and feelings, the nature and context of the concern, immediate and potential risk, previous or cumulative concerns, vulnerability and protective factors, and whether other children may be at risk.

Decisions should be based on the information available at the time rather than certainty about what has occurred. Significant safeguarding decisions, including a decision not to make an external referral, and the rationale for them must be recorded.

A child's wishes and feelings should be sought and taken seriously wherever appropriate, but do not determine whether safeguarding action is required. Where action is necessary contrary to the child's wishes, this should be explained sensitively wherever it is safe to do so.

7.5 Parents and carers

Your Space Foundation will ordinarily work openly and collaboratively with parents and carers where this is appropriate and safe.

Parents or carers must not automatically be informed when a safeguarding concern arises. Where informing them may increase risk to the child or another person, expose the child to pressure or retaliation, compromise evidence or interfere with safeguarding or criminal enquiries, advice should be obtained before contact is made.

Significant decisions about informing, delaying informing or not informing a parent or carer and the rationale for them must be recorded.

7.6 Referrals and multi-agency working

Where there is concern that a child may need statutory help or protection, a referral should be made to the children's social care service responsible for the area in which the child lives. Referral must not be delayed solely because some information is unavailable.

Where there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, children's social care must be contacted without delay. Police involvement may also be required where a suspected criminal offence or immediate danger is involved.

If a referral is not accepted, or Your Space Foundation remains concerned that the response does not adequately address the child's needs or risks, the concern must be challenged or escalated through appropriate local safeguarding arrangements.

7.7 Recording and follow-up

All safeguarding concerns must be recorded accurately and as soon as possible. Records should distinguish clearly between what was said or observed, relevant context, professional opinion, decisions and their rationale, information shared, action taken and required follow-up. Wherever possible, the child's own words should be recorded accurately.

Detailed requirements for safeguarding records are set out in Section 11.

Safeguarding responsibility does not necessarily end when information has been shared or a referral made. The Designated Safeguarding Team will maintain appropriate oversight of referrals, outcomes, outstanding actions and continuing or cumulative concerns.

7.8 Continuing therapeutic support

A safeguarding concern, disclosure or referral does not automatically mean that therapeutic work should end. Where appropriate and safe, Your Space Foundation will seek to provide continuity, stability and emotional support while safeguarding processes take place.

Therapy must not become an investigation. Practitioners should remain attentive to the child's experience of the safeguarding response, any changes in risk or relationships, and the impact upon the therapeutic relationship.

Practitioners will have access to appropriate safeguarding consultation and clinical supervision. Clinical supervision may support reflection on the therapeutic and emotional impact of safeguarding work but does not replace safeguarding reporting, consultation or action.

8. Safeguarding within Counselling and Therapeutic Practice

Your Space Foundation recognises that safeguarding within counselling and psychotherapy requires practitioners to protect the privacy, trust and autonomy necessary for effective therapeutic work while taking appropriate action where information raises concerns about a child's safety or welfare.

Safeguarding should not unnecessarily intrude upon the therapeutic process. Equally, therapeutic confidentiality must not prevent appropriate action to help, support or protect a child.

8.1 Confidentiality and the therapeutic relationship

Children should be able to use therapy to explore difficult experiences, thoughts, feelings and relationships without assuming that everything they discuss will automatically be shared.

Confidentiality is fundamental to therapeutic practice but is not absolute. Practitioners must explain confidentiality and its limits clearly and in a developmentally appropriate way at the beginning of therapeutic work and revisit this where necessary.

Where safeguarding information arises, decisions about sharing should be necessary and proportionate and take account of the child's circumstances, wishes and feelings and the potential consequences of sharing or withholding information. Only information relevant to the safeguarding purpose should ordinarily be shared.

Detailed information-sharing requirements are set out in Section 9.

8.2 Consent and participation in therapy

Consent to counselling or therapeutic intervention must be valid, informed and appropriate to the individual child's circumstances.

Young people aged 16 and 17 will ordinarily be able to consent to their own therapeutic intervention. A child under 16 may be able to consent independently where they have sufficient maturity and understanding to make the particular decision, in accordance with the principles of Gillick competence.

Where a child cannot consent independently, appropriate consent must be obtained from a person with parental responsibility or another person or authority legally able to provide it.

The Fraser guidelines relate specifically to contraceptive and sexual health advice and treatment for children under 16 and should not be used interchangeably with Gillick competence.

Regardless of who provides legal consent, practitioners should ensure that children understand the therapeutic process, confidentiality and its limits as far as possible and should remain attentive to the child's own willingness to participate.

Where consent, competence or parental responsibility is complex or disputed, appropriate safeguarding, management or legal advice must be sought.

8.3 Parental involvement and therapeutic privacy

Parents and carers can be important partners in supporting children's wellbeing and should be involved appropriately. However, parental responsibility does not create an automatic entitlement to the content of a child's therapeutic sessions.

Clear expectations about confidentiality, communication with parents or carers, reviews and safeguarding exceptions should be established at the beginning of therapeutic work.

Where information is shared with parents or carers, it should be necessary and proportionate rather than routinely including detailed therapeutic content. Wherever appropriate and safe, the child should understand what will be shared and be involved in how this is communicated.

8.4 Safeguarding information arising through therapy

Safeguarding information may emerge directly or indirectly through a child's words, behaviour, play, creative expression, relationships, emotional presentation or patterns developing across sessions.

Practitioners should remain curious about what therapeutic material may be communicating without treating play, artwork, metaphor or other symbolic expression, in isolation, as factual evidence that abuse has occurred.

Therapeutic exploration must not become safeguarding investigation. Practitioners may seek sufficient clarification to understand a concern and immediate safety needs but must not undertake investigative questioning to establish whether abuse occurred or gather evidence.

Where safeguarding information arises, it must be reported and managed in accordance with Section 7.

8.5 Mandatory reporting of child sexual abuse

The Crime and Policing Act 2026 introduces a statutory mandatory reporting duty in England in relation to specified child sexual offences.

At the date of approval of this policy, the relevant mandatory reporting provisions have been enacted but are not yet in force. Your Space Foundation will review this policy and associated procedures when the provisions are commenced and relevant statutory guidance is issued.

Once commenced, the duty will apply to adults undertaking relevant activities as defined by the Act and will require notification to the police or local authority where the statutory reporting conditions are met. The legislation contains specific requirements, exceptions and provisions concerning how the duty may be discharged, which must be applied in accordance with the Act and associated statutory guidance.

The statutory duty is distinct from Your Space Foundation's existing safeguarding requirements. Practitioners must continue to report safeguarding concerns about sexual abuse or exploitation in accordance with Section 7 regardless of whether the statutory mandatory reporting duty applies.

Once the statutory provisions are in force, Your Space Foundation will ensure that affected practitioners understand their individual responsibilities and that organisational procedures do not prevent or improperly delay compliance with the duty.

8.6 Sexual activity, self-harm and other complex presentations

Information about sexual activity, self-harm, suicidal thoughts, emotional distress or other potentially concerning experiences requires thoughtful and proportionate assessment and does not automatically determine a particular safeguarding response.

Where sexual activity involving a young person raises concerns, practitioners should consider age and development, consent, power differences, coercion, exploitation, grooming and the wider circumstances. A child under 13 cannot legally consent to sexual activity. Information indicating sexual activity involving a child under 13 must be reported immediately to the Designated Safeguarding Team and considered in accordance with the circumstances, applicable law and statutory safeguarding procedures.

Self-harm, suicidal thoughts and mental health difficulties do not automatically indicate abuse or require referral to children's social care. Where there is immediate risk to life or serious injury, urgent medical or mental health intervention must take priority. Where the presentation may be connected to abuse, neglect, exploitation or another safeguarding concern, safeguarding procedures must also be followed.

Mental health support, therapeutic intervention and safeguarding action may be required alongside one another.

8.7 Historical abuse and safeguarding information arising in adult therapy

Safeguarding responsibilities may arise from information about historical or non-recent abuse and from therapeutic work with adults.

Where historical abuse is disclosed, practitioners should consider whether the person alleged to have caused harm currently has access to children, whether any child may presently be at risk and whether safeguarding or police involvement may be required.

Information arising during adult therapy must not automatically remain confidential where it indicates that a child may need safeguarding help or protection. Where appropriate and safe, the adult client should be involved transparently in the safeguarding process.

Concerns must be reported and considered in accordance with this policy.

8.8 Inclusive, accessible and remote therapeutic practice

Safeguarding concerns must not be overlooked or misinterpreted because of a child's disability, neurodivergence, communication style or additional needs. Practitioners should consider the child's individual means of communication and make reasonable adjustments to enable their participation in safeguarding processes where required.

The same safeguarding responsibilities apply to online and remote therapeutic work. Practitioners must have appropriate arrangements for responding to emergencies, including knowing the child's location and how relevant emergency support can be accessed where necessary.

Practitioners should remain alert to whether a child has sufficient privacy to participate safely and whether they may be monitored, overheard, coerced or unable to speak freely.

8.9 Safeguarding consultation, recording and continuing therapeutic support

Safeguarding consultation and clinical supervision have different but complementary purposes. Safeguarding consultation supports decisions about children's safety, information sharing, referral and protective action; clinical supervision supports ethical therapeutic practice, reflection and the therapeutic relationship.

Safeguarding concerns must not be held until clinical supervision where earlier reporting or action is required.

Safeguarding information arising through therapy must be recorded in accordance with Section 11, with appropriate distinction between therapeutic material, factual safeguarding information, professional interpretation, decisions and actions. The complete therapeutic record should not routinely be reproduced within safeguarding records or disclosed solely because a safeguarding concern has arisen.

Safeguarding action does not automatically mean that therapy should end. Where appropriate and safe, practitioners should continue to provide therapeutic stability and

support and recognise that a child may experience information sharing as difficult or as a rupture in trust.

Safeguarding action should not unnecessarily deprive a child of a trusted therapeutic relationship at a time when they may particularly need stability and support.

9. Confidentiality, Consent and Information Sharing

Your Space Foundation recognises that children and families have a legitimate expectation that personal and therapeutic information will be treated with care and confidentiality. We also recognise that appropriate information sharing is essential to identifying need, understanding risk, providing help and protecting children from harm.

Data protection legislation and professional confidentiality do not prevent appropriate safeguarding information sharing. Practitioners must balance respect for privacy and therapeutic confidentiality with their responsibility to share information where this is necessary and proportionate to safeguard or promote the welfare of a child.

9.1 Principles of safeguarding information sharing

Safeguarding information will be shared lawfully, securely and proportionately. Decisions should place the child's safety and welfare at the centre, consider their wishes and feelings, and take account of the potential consequences of both sharing and withholding information.

Practitioners should be proactive in sharing relevant safeguarding information where this may assist another practitioner or agency to identify need, understand risk or provide appropriate help or protection.

Information shared should be relevant and sufficient for the safeguarding purpose, accurate as far as possible, and shared only with those who need it. Practitioners should distinguish clearly between fact, information provided by others, observation and professional opinion.

Significant decisions to share or withhold safeguarding information and the reasons for those decisions must be recorded.

Uncertainty about confidentiality or data protection must not prevent or unnecessarily delay action required to safeguard a child.

9.2 Consent, transparency and the child's wishes

Consent is not always required before information is shared for safeguarding purposes. Where there is an appropriate lawful basis, information may be shared without the consent of the child or their parent or carer where this is necessary and proportionate to safeguard or promote the welfare of a child.

Wherever appropriate and safe, Your Space Foundation will be open with children and families about how information is used and shared. Children should be given developmentally appropriate information about confidentiality and its limits and, where possible, involved in decisions about safeguarding information sharing.

A child's wishes and feelings must be taken seriously but do not determine whether necessary safeguarding information can be shared. Where information must be shared contrary to a child's wishes, the reasons should be explained sensitively wherever it is safe to do so and appropriate support should continue to be provided.

Consent should not be sought, and a child, parent or carer should not be informed before information is shared, where doing so may increase risk, expose a child to coercion or retaliation, compromise evidence, interfere with safeguarding or criminal enquiries, or otherwise undermine the safeguarding purpose.

9.3 Lawful, necessary and proportionate sharing

Your Space Foundation will process and share personal information in accordance with the **UK General Data Protection Regulation, Data Protection Act 2018 and other applicable legislation**.

An appropriate lawful basis, and where required a condition for processing special category data, must support safeguarding information sharing. Practitioners are not expected to undertake complex legal analysis during urgent safeguarding situations and should seek advice from the Designated Safeguarding Team where necessary.

Safeguarding does not justify unrestricted disclosure. Only information relevant to the identified purpose should ordinarily be shared. Equally, information should not be withheld merely because it appears limited or has not been independently verified where it may be relevant to understanding risk; its source and status should be made clear.

Where legislation creates a specific duty to disclose or report information, Your Space Foundation and its practitioners will comply with that duty. This includes the mandatory reporting provisions concerning specified child sexual offences within the Crime and Policing Act 2026 once those provisions are commenced, as set out in Section 8.5.

Where Your Space Foundation falls within the scope of a statutory information-sharing duty, including where it is engaged by an organisation covered by the **Children Act 2004** to provide services relating to safeguarding or promoting the welfare of children, the organisation will comply with the applicable legal duty and statutory guidance.

The application of any statutory information-sharing duty will be considered according to the circumstances of the service and does not remove the requirement for information sharing to be relevant, secure and appropriately recorded.

9.4 Sharing with parents, schools and other organisations

Parents and carers will ordinarily be important partners in safeguarding children, but parental responsibility does not create an automatic right to receive all information contained within a child's therapeutic or safeguarding records.

Similarly, a school, commissioner, funder or partner organisation does not have unrestricted access to therapeutic information simply because it commissions, hosts or funds a service.

Relevant safeguarding information should be shared where necessary and lawful to protect or support a child. Routine therapeutic content should remain confidential unless there is an appropriate reason and lawful basis for disclosure.

Where safeguarding information is passed to another organisation, responsibility for any further action should be clearly understood and recorded. Practitioners must not assume that action has been taken simply because information has been shared.

Your Space Foundation will cooperate appropriately with children's social care, police, health, education and other agencies involved in safeguarding children and will contribute relevant information to multi-agency safeguarding processes where required.

9.5 Requests for therapeutic records and third-party information

Requests for therapeutic records must be considered carefully. A request from a parent, school, commissioner, solicitor, police, children's social care or another professional does not automatically require disclosure of the complete therapeutic record.

All requests for therapeutic records must be referred to **Felicity Botterill or Deena Singh, who jointly hold responsibility for information governance within Your Space Foundation**, before records are released, unless immediate disclosure is required to protect a child or comply with an urgent legal requirement.

Consideration must be given to the authority and purpose of the request, the legal basis for disclosure, the child's confidentiality, wishes and circumstances, third-party information, and whether relevant information or a summary would meet the purpose without disclosure of the complete record.

Court orders and other formal legal requirements must be responded to appropriately, with legal advice obtained where necessary.

Information concerning another person should not automatically be disclosed simply because it appears within a child's record. However, third-party confidentiality must not prevent necessary and lawful safeguarding information sharing.

9.6 Safeguarding information arising outside the child's own therapy

Safeguarding responsibility applies where information received through Your Space Foundation's work raises concern about any child, including a child who is not receiving a service from the organisation.

Information obtained during work with an adult may therefore need to be shared where it indicates that a child may require safeguarding help or protection. Where appropriate and safe, the adult client should be informed and involved, but refusal of consent does not prevent necessary and lawful safeguarding information sharing.

Where a child receiving therapy communicates a safeguarding concern about another child, the concern must be reported through Your Space Foundation's safeguarding arrangements and information shared as necessary and proportionate to safeguard the child concerned.

9.7 Security, recording and advice

Safeguarding information must be communicated, stored and disclosed securely using approved organisational systems wherever practicable. Reasonable steps must be taken to verify recipients and protect information from loss, misdirection or unauthorised disclosure.

Security requirements must not create unsafe delay where urgent information sharing is required to protect a child.

Significant information-sharing decisions must be recorded, including what was shared or withheld, with whom, the purpose and rationale, the child's and family's involvement where relevant, and any required follow-up.

Practitioners who are uncertain about information sharing should seek advice from the Designated Safeguarding Team. **Felicity Botterill and Deena Singh jointly hold responsibility for information governance within Your Space Foundation** and should be consulted where safeguarding concerns also raise significant questions about confidentiality, data protection, access to records or disclosure of therapeutic information.

Further professional, information governance or legal advice will be obtained where required. Seeking advice must not delay immediate action necessary to protect a child.

10. Making Referrals and Working with Statutory Agencies

Your Space Foundation recognises that effective safeguarding requires collaboration between children, families, practitioners, statutory agencies and other organisations involved in the child's life.

We will work constructively with children's social care, police, health, education and other relevant agencies while maintaining clarity about our own therapeutic and safeguarding responsibilities. The involvement of another agency does not remove Your Space Foundation's responsibility to remain attentive to the child's safety, wellbeing and lived experience.

10.1 Levels of need and safeguarding thresholds

Children and families may require different levels of help and protection at different times. Safeguarding responses should be proportionate to the child's needs and circumstances and should not be limited to situations where significant harm has already occurred.

Where a child has additional or emerging needs, consideration should be given to appropriate family help, community or specialist support. Where a child's needs may require statutory assessment or services, a referral to children's social care should be considered.

Under **section 17 of the Children Act 1989**, children's social care may provide assessment and services for children in need. A child does not need to be at risk of significant harm before statutory support may be appropriate.

Under **section 47 of the Children Act 1989**, local authorities have a duty to make enquiries where there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm. Where information known to Your Space Foundation gives rise to such a concern, it must be treated as a child protection concern and reported **immediately** in accordance with Section 7.

Local threshold or levels-of-need guidance should inform decision-making where relevant but must not replace professional judgement.

10.2 Making referrals

Referrals should ordinarily be made to the children's social care service responsible for the area in which the child lives, using the relevant local referral arrangements.

A referral should provide sufficient relevant information to enable children's social care to understand the child's circumstances, presenting concerns, known risks and protective factors, wishes and feelings, relevant history and context, action already taken and the help or protection being requested.

Practitioners should distinguish clearly between fact, information provided by others, observation and professional opinion. A referral must not be delayed solely because all desired information is not available.

Where appropriate and safe, referrals should be made openly and collaboratively with children and families. Consent is not required where there is another lawful basis for sharing information and referral is necessary and proportionate to safeguard or promote the welfare of a child. Section 9 applies to information-sharing decisions.

Where another organisation agrees to make a referral or take safeguarding action, Your Space Foundation should obtain appropriate confirmation that the action has been taken and seek relevant feedback or outcomes necessary to understand any continuing responsibilities to the child.

10.3 Working with statutory safeguarding processes

Your Space Foundation will cooperate appropriately with statutory safeguarding processes, including assessments, strategy discussions, section 47 enquiries, child protection conferences and plans, and other relevant multi-agency arrangements.

Where Your Space Foundation holds information relevant to understanding a child's safety, needs or lived experience, this should be shared lawfully and proportionately. The child's wishes and feelings should remain visible within multi-agency work and be clearly distinguished from professional interpretation.

Practitioners may contribute factual information, relevant observations, patterns and therapeutic perspectives within their professional competence. They must not undertake safeguarding investigations, attempt to verify allegations or allow therapeutic work to become an extension of statutory assessment or investigation.

Requests for therapeutic records or substantial confidential information must be managed in accordance with Section 9.

10.4 Outcomes, continuing concerns and escalation

Following a referral, Your Space Foundation should seek to understand the outcome and any action required of the organisation.

A decision by children's social care not to take further action does not necessarily mean that the original concern was unfounded or that the child has no unmet needs. Your Space Foundation will continue to consider the child's circumstances and any support or safeguarding action required within its role.

Where new information emerges, concerns increase or circumstances change, a further referral may be made. New information should be considered alongside previous concerns rather than in isolation.

Where Your Space Foundation remains concerned that a child's needs or risks have not been adequately recognised or addressed, the Designated Safeguarding Team will challenge or escalate the response through appropriate local safeguarding arrangements.

Professional hierarchy, concern about inter-agency relationships or a previous threshold decision must not prevent appropriate challenge. Escalation processes must never delay immediate protective action.

10.5 Police and emergency action

Where a child is in immediate danger or there is an urgent risk of serious harm, emergency services must be contacted without delay and reasonable steps taken within the practitioner's role to support the child's immediate safety.

Police involvement should be considered where urgent police protection is required, a suspected criminal offence requires police involvement, another statutory agency advises police contact, or a specific legal reporting requirement applies.

Practitioners do not need to establish that a criminal offence has definitely occurred before necessary police contact is made.

Internal consultation or organisational procedures must never delay emergency action required to protect a child.

10.6 Continuing therapeutic involvement and recording

Statutory safeguarding involvement does not automatically mean that Your Space Foundation should withdraw therapeutic support.

Where appropriate and safe, therapeutic work may continue alongside statutory involvement, provided that its purpose and boundaries remain clear and it does not compromise safeguarding assessment or investigation. Decisions to significantly adapt, pause or end therapeutic work because of safeguarding involvement should consider the child's needs and wishes, safety, therapeutic relationship, professional judgement and relevant advice from statutory agencies.

Your Space Foundation will maintain appropriate records of referrals and significant multi-agency safeguarding activity, including relevant decisions, information sharing, outcomes, agreed actions and escalation.

Records should enable the organisation to understand the chronology of safeguarding involvement and identify changes, patterns and cumulative concerns over time.

11. Safeguarding Records and Chronologies

Accurate, timely and secure recording is an essential part of safeguarding practice.

Safeguarding records must provide a clear account of the concern, the information available at the time, the child's communication and lived experience, decisions made and their rationale, information shared, action taken and subsequent outcomes.

Records should support continuity, accountability and the identification of patterns or cumulative harm.

11.1 Recording safeguarding concerns

Every safeguarding concern reported under this policy must be recorded as soon as reasonably practicable.

Your Space Foundation's Record of Concern form, included at Appendix 2, must be used to record safeguarding concerns and the subsequent safeguarding response. Immediate safeguarding action must never be delayed in order to complete the form.

Where immediate safeguarding action is required, protecting the child takes priority over completing the written record. The record must be completed as soon as possible afterwards.

Records should include sufficient information to understand:

- the child concerned and when and how the concern arose;
- what the child said or communicated and relevant observations or information received from others;
- relevant context, previous concerns and immediate safety considerations;
- the child's wishes and feelings where known;
- safeguarding consultation, decisions and their rationale;
- information shared, referrals and responses received; and
- action taken and any required follow-up.

Records should be dated and timed where relevant and must identify the person making the record.

11.2 Accurate and professional recording

Where a child makes a verbal disclosure, their own words should be recorded as accurately as possible. Practitioners must not rewrite the child's account into professional terminology, add information the child did not provide or present interpretation as though it were the child's own account.

Where safeguarding information arises through behaviour, play, artwork, writing or other non-verbal communication, practitioners should record what was actually observed or communicated separately from any professional interpretation.

Safeguarding records must distinguish, where relevant, between known fact, information reported by the child or another person, practitioner observation, professional opinion and information that has not been verified.

Professional judgement and analysis may appropriately be recorded but must be clearly identifiable as such. Speculative, judgemental or unnecessarily emotive language should be avoided.

11.3 Therapeutic and safeguarding records

Therapeutic and safeguarding records serve related but distinct purposes.

Therapeutic records document information relevant to the provision of counselling or psychotherapy. Safeguarding records document concerns about a child's safety or welfare,

safeguarding consultation and decision-making, information sharing, referrals and subsequent action.

Safeguarding information arising within therapy may need to be reflected in both records, but unnecessary duplication should be avoided. Detailed therapeutic content should not routinely be reproduced within safeguarding records where it is not relevant to the safeguarding purpose.

Significant safeguarding information must not exist solely within general therapy notes, an individual practitioner's private records or their memory where this would prevent appropriate organisational safeguarding oversight.

11.4 Chronologies and cumulative concerns

A safeguarding chronology should be established where there are repeated, significant or ongoing concerns, or where this would assist understanding of the child's circumstances.

A chronology should provide a concise, dated record of significant safeguarding events and decisions rather than duplicate the complete safeguarding record. Its purpose is to make patterns, changes and cumulative concerns visible over time.

When new concerns arise, relevant previous safeguarding information should be considered. Apparently separate concerns may become significant when considered together or across different settings, relationships or periods of time.

Significant safeguarding decisions must be recorded, including where the decision is that no external referral or further action is required at that time. The record should make clear the information considered, the decision reached, its rationale and any review or follow-up required.

11.5 Organisational oversight, security and continuity

Safeguarding records must be maintained in a way that enables the Designated Safeguarding Team to oversee current and previous concerns, identify patterns and cumulative harm, monitor referrals and outstanding actions and ensure continuity when practitioners or services change.

Safeguarding information must be stored securely using systems approved by Your Space Foundation, with access restricted according to legitimate safeguarding, professional, governance or legal need. It must not ordinarily be stored on personal devices, personal email accounts, personal messaging applications or unapproved storage systems.

Where responsibility for a child's therapeutic work changes, relevant safeguarding information must be handed over appropriately. Practitioners leaving Your Space Foundation must ensure that safeguarding records are complete, outstanding actions are identified and relevant organisational records remain accessible.

Records relating to allegations or concerns about adults working with children must be managed in accordance with the relevant section of this policy and must not be recorded within a child's safeguarding record as though they concern the child's conduct.

11.6 Access, disclosure, retention and quality assurance

Access to, and disclosure of, safeguarding and therapeutic records must be managed in accordance with applicable data protection legislation, Your Space Foundation's information governance arrangements and Section 9 of this policy.

Requests for access to safeguarding or therapeutic records, including subject access requests and requests from police, courts or statutory agencies, must be referred to Felicity Botterill or Deena Singh, who jointly hold responsibility for information governance, unless immediate disclosure is necessary to protect a child or comply with an urgent legal requirement.

Safeguarding records will ordinarily be retained until seven years after the child's 18th birthday.

Where the child is, or has been, care experienced, safeguarding records will ordinarily be retained until the individual reaches 75 years of age.

Records relevant to an active safeguarding enquiry, allegation, complaint, investigation, legal proceeding or statutory inquiry must not be destroyed while that process remains ongoing, even where the usual retention period has been reached.

At the end of the applicable retention period, records will be securely destroyed unless there is a continuing legal, safeguarding or organisational reason for retention.

Corrections or additions to safeguarding records must preserve an appropriate audit trail. Original information must not be deleted or retrospectively altered in a way that obscures what was originally recorded.

The Designated Safeguarding Team will periodically review safeguarding recording practice to support appropriate standards of recording, follow-up, security and organisational learning.

12. Concerns and Allegations About People Working With Children

Your Space Foundation is committed to maintaining a safeguarding culture in which concerns about the conduct, behaviour or suitability of anyone working with children are recognised, reported and responded to appropriately.

This section applies to everyone working for or on behalf of Your Space Foundation, regardless of role, seniority, professional status or contractual arrangement. The safety and welfare of children must remain central while concerns are handled fairly, objectively, confidentially and without unnecessary delay.

12.1 Allegations that may meet the harm threshold

An allegation may meet the harm threshold where a person who works with children 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; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Relevant behaviour may arise within or outside the person's work for Your Space Foundation, including within their private or family life, another organisation, voluntary activity or online activity, where this raises concerns about their suitability to work with children.

Where there is uncertainty about whether the harm threshold may be met, advice will be sought from the relevant **Local Authority Designated Officer (LADO)**.

12.2 Reporting and immediate action

Any allegation that may meet the harm threshold must be reported **immediately** to **Deena Singh, Designated Safeguarding Lead/Safeguarding Manager**, or **Felicity Botterill, Deputy Designated Safeguarding Lead**.

Where an allegation concerns Deena Singh, it must be reported directly to Felicity Botterill. Where it concerns Felicity Botterill, it must be reported directly to Deena Singh.

Where both are implicated, neither can appropriately manage the matter, or internal reporting would be inappropriate or insufficient to protect a child, the **external escalation arrangements in Section 5** must be followed.

No person who is the subject of an allegation may manage or make decisions about the organisational response to that allegation.

The immediate safety and welfare of any child potentially affected must be considered first. Emergency services, children's social care or police must be contacted where necessary, and protective action must not be delayed while employment, contractual or disciplinary matters are considered.

12.3 LADO referral and management of allegations

Where an allegation may meet the harm threshold, Your Space Foundation will contact the relevant LADO **without delay and within one working day**. The LADO may also be contacted for advice where it is unclear whether the threshold is met.

Initial information gathering will be limited to establishing the basic facts necessary to understand the allegation, immediate risk and appropriate next steps. Your Space Foundation will not undertake an internal investigation that could compromise a LADO, police or children's social care process.

Your Space Foundation will cooperate with relevant statutory agencies and follow appropriate advice about managing the allegation. Relevant records and potential evidence will be preserved.

An allegation does not automatically require suspension. Decisions about suspension, restriction or alteration of duties will be based on the circumstances, potential risk to children and whether that risk can safely be managed by other means.

The person who is the subject of the allegation will be treated fairly, kept appropriately informed and offered reasonable support, subject to the safety of children and the integrity of any safeguarding or criminal investigation.

12.4 Low-level concerns

Your Space Foundation encourages the reporting of behaviour that is inconsistent with expected professional standards, safeguarding practice or appropriate professional boundaries, even where the behaviour does not appear, on the information currently available, to meet the harm threshold.

A low-level concern does not mean an insignificant concern. It may indicate poor judgement, unclear or blurred professional boundaries, or behaviour which becomes more significant when considered alongside other information or as part of a pattern.

Low-level concerns must be reported promptly to the DSL or Deputy DSL and recorded appropriately. Practitioners are not expected to determine the seriousness of a concern before reporting it.

The Designated Safeguarding Team will consider concerns in context and alongside any previous information and determine whether LADO advice, safeguarding or management action, supervision, training, disciplinary action or another response is required.

Low-level concerns will be reviewed for patterns. Repeated concerns or additional information may result in reassessment against the harm threshold.

People working for Your Space Foundation are also encouraged to self-report situations where their own conduct may have crossed or blurred a professional boundary or could reasonably be misunderstood.

12.5 Supporting children and managing outcomes

The safety, welfare and support needs of any child affected by an allegation must remain central throughout the process. Unnecessary repeated questioning should be avoided.

Where an allegation concerns the child's therapist, consideration must be given to how appropriate therapeutic support can continue without requiring contact with the person who is the subject of the allegation.

Allegations will be considered fairly and objectively and outcomes recorded in accordance with current safeguarding guidance and LADO advice.

An allegation that is not substantiated does not mean that a child acted maliciously. A child must not be blamed or disadvantaged because an allegation is not proven.

Resignation, termination of an associate agreement, withdrawal from a placement or volunteering role, or any other departure from Your Space Foundation does not bring safeguarding processes to an end or remove any requirement to cooperate with statutory agencies or make appropriate referrals.

12.6 DBS, regulated activity and professional referrals

Your Space Foundation will comply with its legal duty to refer an individual to the **Disclosure and Barring Service (DBS)** where it is acting as a regulated activity provider and the statutory referral conditions are met.

This includes circumstances where an individual has been removed from regulated activity because of safeguarding concerns, or would have been removed had they not resigned, withdrawn, retired or otherwise ceased the activity, and the relevant statutory conduct, harm or offence conditions are met.

The duty to refer may apply even where the LADO, police, children's social care or a professional body is already involved.

Your Space Foundation will ensure that roles involving children are assessed against the current statutory definition of regulated activity and that appropriate safeguarding and DBS arrangements are maintained. A person who is barred from regulated activity with children must not knowingly be permitted to undertake such activity on behalf of Your Space Foundation.

Where concerns relate to a professionally registered or accredited practitioner, Your Space Foundation will also consider whether referral to the relevant professional body or regulator is required. This does not replace any requirement to contact the LADO, DBS, children's social care or police.

12.7 Confidentiality, recording and organisational learning

Information about allegations and low-level concerns will be handled confidentially and shared only where there is a legitimate safeguarding, legal, employment, contractual or professional reason.

A clear and secure record must be maintained of concerns, significant decisions and their rationale, consultation and referrals, action taken and outcomes.

Records concerning the conduct of adults will be maintained separately from a child's safeguarding record, while information relevant to the child's own safety, experience and support will be recorded appropriately within their record.

Your Space Foundation will use learning from concerns and allegations to review safeguarding culture and practice, including professional boundaries, supervision, recruitment, training, management oversight and organisational procedures.

12.8 Concerns about safeguarding leadership

Where a concern or allegation relates to the DSL, Deputy DSL or a Director, the escalation arrangements in **Section 5** must be followed.

No individual may oversee, investigate or determine an allegation concerning themselves.

Where both safeguarding leads are implicated, neither can appropriately manage the matter, or internal reporting would be inappropriate or insufficient to protect a child, the **external escalation arrangements in Section 5** must be followed. This may include contacting the relevant LADO, children's social care or police directly, according to the nature of the concern.

LADO advice must be sought without delay where the concern relates to a person working with children and may meet the harm threshold.

The absence of an available senior manager or safeguarding lead must never prevent direct contact with the LADO, children's social care or police where this is necessary to safeguard a child.

13. Safer Recruitment and Professional Conduct

Your Space Foundation is committed to ensuring that people working with children are appropriately selected, checked, supported and held to clear standards of professional conduct.

Recruitment and selection will be undertaken in accordance with the Your Space Foundation Safer Recruitment Policy, relevant legislation and current safeguarding guidance.

13.1 Safer recruitment and ongoing suitability

Your Space Foundation will take appropriate steps to establish the identity, qualifications, experience and suitability of individuals undertaking work with children. This includes appropriate references, verification of relevant qualifications and professional registration or membership, right-to-work checks and Disclosure and Barring Service (DBS) checks appropriate to the role.

Roles will be assessed against current legislation and guidance to determine whether they constitute regulated activity and the level of DBS check, including any barred-list check, that may lawfully be obtained.

Therapists undertaking work with children on behalf of Your Space Foundation are required to maintain an appropriate Enhanced DBS certificate registered with the DBS Update Service. Your Space Foundation undertakes a status check through the Update Service at least annually.

Suitability to work with children is an ongoing responsibility. Everyone working for or on behalf of Your Space Foundation must promptly disclose any change in circumstances that may affect their suitability to work with children or safely undertake their role, including any relevant restriction, suspension, investigation or change in professional registration, accreditation or membership, subject to applicable legal and contractual requirements.

Where a DBS Update Service check indicates that the certificate is no longer current, or other information raises a concern about suitability, appropriate checks and safeguarding or risk-management action will be undertaken before the individual undertakes or continues relevant work with children.

Concerns about the conduct or suitability of a person working with children will be managed in accordance with Section 12.

13.2 Professional conduct and boundaries

Everyone working for or on behalf of Your Space Foundation must maintain appropriate professional boundaries and standards of conduct in all interactions with children and families, including face-to-face, online and digital communication.

Relationships with children must remain professional and must never be exploitative, sexualised, coercive or otherwise misuse the trust, authority or influence associated with the person's role.

Practitioners must follow organisational requirements concerning communication, social media, personal contact, physical contact, self-disclosure, gifts and relationships outside the agreed professional context.

Where a practitioner is uncertain about a professional boundary, they should seek advice or supervision. Concerns about professional conduct, including low-level concerns, must be reported in accordance with Section 12.

13.3 Induction and safeguarding expectations

Everyone undertaking work with children on behalf of Your Space Foundation will receive safeguarding induction appropriate to their role in accordance with Section 14.

Practitioners working within schools, colleges or partner organisations must also understand and comply with relevant safeguarding and professional conduct requirements within the setting.

Everyone working for or on behalf of Your Space Foundation is responsible for maintaining appropriate professional standards and raising concerns where the conduct or practice of another person may place children at risk.

14. Safeguarding Training, Supervision and Support

Your Space Foundation recognises that effective safeguarding requires practitioners to maintain current knowledge, understand organisational safeguarding arrangements and have access to appropriate consultation, supervision and support.

Safeguarding competence is an ongoing professional responsibility and is supported through induction, annual training, safeguarding updates, consultation and clinical supervision.

14.1 Safeguarding induction and training

All practitioners undertaking work with children on behalf of Your Space Foundation must complete safeguarding training **at least annually**. Training must be appropriate to their role and the nature of their work with children and families.

Safeguarding is also included within Your Space Foundation's induction arrangements. Practitioners must understand this policy, how to recognise and report concerns, the required reporting timescales, confidentiality and information-sharing responsibilities, safeguarding recording requirements and how to access the Designated Safeguarding Team.

Practitioners working within schools or colleges must also familiarise themselves with the relevant current requirements of **Keeping Children Safe in Education (KCSIE)** and complete any safeguarding induction or training required by the individual setting.

Safeguarding knowledge will be updated between formal training where required. Your Space Foundation will communicate relevant changes in legislation, statutory guidance, organisational practice and emerging safeguarding issues through a combination of team meetings, written updates and additional training or briefings.

14.2 Designated Safeguarding Team training

The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead will undertake appropriate DSL training, refreshed at least every two years.

Their safeguarding knowledge and skills will also be refreshed at least annually, and more frequently where required, through relevant updates, briefings, professional development and engagement with changes in legislation, statutory guidance, local safeguarding arrangements and emerging safeguarding risks.

Significant changes relevant to Your Space Foundation's practice will be communicated appropriately within the organisation.

14.3 Safeguarding consultation and clinical supervision

All therapeutic practitioners working on behalf of Your Space Foundation are required to maintain appropriate external clinical supervision in accordance with relevant professional and organisational requirements.

Clinical supervision and safeguarding consultation perform different but complementary functions. Clinical supervision supports ethical and effective therapeutic practice, professional reflection and consideration of the therapeutic relationship. Safeguarding consultation supports decisions concerning children's safety and welfare, information sharing, referral and protective action.

Practitioners have access to safeguarding consultation with the Designated Safeguarding Team when concerns or uncertainties arise, including between scheduled clinical supervision sessions.

Safeguarding concerns must not be held until the next clinical supervision session where earlier reporting, consultation or action is required. Reporting timescales set out in Section 7 apply regardless of when clinical supervision is scheduled.

14.4 Practitioner support

Your Space Foundation recognises that safeguarding work can have a significant professional and emotional impact on practitioners, particularly following serious disclosures, complex child protection concerns, allegations, critical incidents or other distressing safeguarding situations.

Additional support will be offered where appropriate and will be tailored to the circumstances and the needs of the individual practitioner. This may include additional safeguarding consultation, management support, opportunities for reflective discussion, liaison with the practitioner's external clinical supervisor or other appropriate support.

Practitioner support will not replace, delay or interfere with necessary safeguarding action or statutory processes.

Your Space Foundation seeks to maintain a safeguarding culture in which practitioners are able to ask questions, acknowledge uncertainty, seek advice and raise concerns without fear that doing so will be regarded as professional failure.

15. Whistleblowing, Professional Challenge and Escalation

Your Space Foundation is committed to a safeguarding culture in which people are expected and supported to raise concerns about unsafe practice, organisational responses or the conduct of others.

No person working for or on behalf of Your Space Foundation should assume that a safeguarding concern has been adequately addressed solely because it has been considered by someone more senior or by another organisation. Where concerns about a child's safety or welfare remain, practitioners have a responsibility to question, challenge or escalate appropriately.

15.1 Raising concerns about safeguarding practice

Concerns that Your Space Foundation, an individual working on its behalf, or another organisation is failing to safeguard children appropriately should be raised as soon as possible.

Concerns about Your Space Foundation's safeguarding practice should ordinarily be raised with Deena Singh, Designated Safeguarding Lead/Safeguarding Manager, or Felicity Botterill, Deputy Designated Safeguarding Lead, provided neither is implicated.

Where a concern relates to Deena Singh, it should be raised with Felicity Botterill. Where it relates to Felicity Botterill, it should be raised with Deena Singh.

Where both are implicated, neither is able to act independently, or the individual reasonably believes that internal reporting would be inappropriate or insufficient to protect a child, the concern may be raised directly with the appropriate external safeguarding or statutory body.

Safeguarding concerns must not be delayed while internal organisational concerns or disagreements are resolved.

15.2 Whistleblowing

Your Space Foundation's Whistleblowing Policy provides the organisational procedure for raising serious concerns about wrongdoing, unsafe practice, failure to meet legal obligations or failures in the protection of children.

Individuals do not need to prove wrongdoing before raising a concern.

Your Space Foundation will not tolerate victimisation, harassment or disadvantage against a person for raising a genuine safeguarding concern or for making a protected disclosure in accordance with applicable whistleblowing legislation.

Nothing within Your Space Foundation's policies, contractual arrangements or management structures prevents an individual from making an appropriate protected disclosure or from contacting an external safeguarding or statutory body where necessary.

Statutory whistleblowing protections apply where the relevant legal requirements for a protected disclosure are met.

15.3 Professional challenge and escalation

Professional disagreement is a normal part of safeguarding work and must not prevent appropriate action where concerns about a child remain.

Where a practitioner believes that a safeguarding decision or response does not adequately recognise or address a child's needs or risks, they should raise their concerns clearly and seek reconsideration. This may include further discussion with the Designated Safeguarding Team, challenge to another organisation or use of relevant local professional disagreement or escalation procedures.

Where concerns remain unresolved, practitioners may escalate directly to relevant external bodies, which may include children's social care, the LADO, police, or an appropriate professional or regulatory body, according to the nature of the concern.

The child's safety and welfare must remain central throughout professional disagreement. Hierarchy, organisational reputation or concern about professional relationships must never take priority over the need to safeguard a child.

All significant safeguarding challenges and escalations should be recorded, including the concern raised, action taken, response received and any further action required.

16. Governance, Monitoring and Review

Your Space Foundation recognises that effective safeguarding requires organisational oversight, accountability and a willingness to learn and improve.

The Directors retain overall responsibility for safeguarding governance. Operational leadership is provided by the Designated Safeguarding Team, with safeguarding information and learning used to inform organisational practice, training, risk management and service development.

16.1 Safeguarding oversight

The Directors will maintain appropriate oversight of safeguarding arrangements within Your Space Foundation.

This includes assurance that:

- safeguarding policies and procedures remain current and effective;
- appropriate safeguarding training, safer recruitment, supervision and consultation arrangements are maintained;
- safeguarding concerns, referrals, allegations and significant incidents are managed appropriately;
- patterns, recurring concerns and organisational safeguarding risks are identified and addressed; and
- actions arising from safeguarding reviews, complaints, incidents or changes in guidance are implemented.

Safeguarding information provided for governance purposes will be limited to what is necessary and handled in accordance with confidentiality and data protection requirements.

16.2 Monitoring and organisational learning

Your Space Foundation will review safeguarding practice to identify strengths, areas for improvement and emerging risks.

Learning may arise from safeguarding concerns and referrals, allegations or low-level concerns about adults, complaints, professional challenge, case reviews, changes in legislation or statutory guidance, and feedback from children, families, practitioners and partner organisations.

Where learning identifies a need for change, Your Space Foundation will consider appropriate action, which may include changes to policy or procedure, additional training or guidance, changes to supervision or management arrangements, or wider organisational improvement.

The purpose of safeguarding review is not solely to identify individual error but to understand whether organisational systems, culture or practice can be strengthened to improve children's safety.

16.3 Review of safeguarding arrangements

The Designated Safeguarding Team will remain alert to developments in legislation, statutory guidance, local safeguarding arrangements and emerging safeguarding practice relevant to Your Space Foundation's work.

This policy will be formally reviewed **at least annually**, and sooner where required because of:

- changes in legislation or statutory guidance;
- significant changes to Your Space Foundation's services or safeguarding arrangements;
- learning from a safeguarding incident, allegation, complaint or review; or
- evidence that existing arrangements require improvement.

Material changes to this policy will be approved by the Directors and communicated to practitioners.

16.4 Policy ownership and version control

Policy owner: Deena Singh, Designated Safeguarding Lead / Safeguarding Manager

Deputy safeguarding lead: Felicity Botterill, Deputy Designated Safeguarding Lead

Approved by: Your Space Foundation CIC Directors

The Directors retain overall responsibility for safeguarding governance and approval of this policy. The Designated Safeguarding Lead / Safeguarding Manager is responsible for maintaining the policy, coordinating review and identifying amendments required by changes in legislation, statutory guidance or organisational practice.

The current approved version of this policy will be made available to everyone working for or on behalf of Your Space Foundation and, where appropriate, to children, families, commissioners and partner organisations.

Superseded versions will be retained securely for appropriate governance and audit purposes.

Appendix 1 – Safeguarding Contacts and Referral Routes

This appendix should be used alongside the safeguarding procedures set out within this policy.

Contact details and referral arrangements may change. Practitioners must use current local authority and agency information when making a referral. The Designated Safeguarding Team will maintain access to current referral routes for the areas in which Your Space Foundation routinely provides services.

Your Space Foundation Designated Safeguarding Team

Designated Safeguarding Lead (DSL) / Safeguarding Manager

Deena Singh

Contact: deena@yourspacefoundation.co.uk

Deputy Designated Safeguarding Lead (Deputy DSL)

Felicity Botterill

Contact: hello@yourspacefoundation.co.uk

All safeguarding concerns must be reported to the Designated Safeguarding Team as soon as reasonably practicable and on the same working day.

Child protection concerns must be reported immediately. Where email is used to report an immediate child protection concern, the practitioner must ensure that the concern has been received and use an alternative safeguarding or statutory route if timely confirmation cannot be obtained.

The inability to contact a member of the Designated Safeguarding Team must never delay necessary action to safeguard a child.

Local Authority Contact Information

MILTON KEYNES COUNCIL

Milton Keynes Council Children's Social Care and Safeguarding Service & Adult Social Care Hub Contact the Initial Contact Team based at Civic Offices:

- Children 01908 253169 or 01908253170
- Adults 01908 253772
- Out of Hours Emergency Duty Team: Tel – 01908 605650

Milton Keynes Local Authority Designated Officer (LADO):

Interim LADO Jo Clifford

Tel: 01908 254300

Multi Agency Safeguarding Hub 01908 253169/3170 (should LADO not be available) Referral Form is available to download

Milton Keynes SAFEGUARDING CHILDREN BOARD

(MKSCB): Contact the MKSCB staff officer on Tel –
01908 254373,

Email: mkscb@milton-keynes.gov.uk

NORTHAMPTONSHIRE COUNTY COUNCIL:

*Northamptonshire Children's & Adults Social Care and Safeguarding
Service: Tel 0300 1267000*

**Northamptonshire Childrens & Adults Social Care and Safeguarding Service:
Out of Hours Emergency Duty Team:**

Tel - 01604 626938

Designated Officer Local Authority Northamptonshire (DOLA – Formerly LADO):
Safeguarding and Quality Assurance Service, Main Office 01604 363380 (Mon to Fri,
9am – 5pm)

Northamptonshire Review and Conference Service (NRCS):
Century House, First Floor, The Lakes, Northampton, NN4 7SJ.
Tel- 01604 654040, Fax – 01604 654000

NORTHAMPTONSHIRE SAFEGUARDING CHILDREN BOARD (NSCB):
Contact the NSCB staff officer on Tel - 01604 654040, Fax 01604 654000

Emergency and statutory safeguarding contacts

Immediate danger or urgent police/medical assistance
Emergency services: **999**

Police – non-emergency
101

Children's Social Care

Referrals should ordinarily be made to the children's social care service for the local authority in which the child lives.

Your Space Foundation routinely maintains referral information for the local authority areas in which it delivers services.

Where a child lives outside these areas, the appropriate children's social care service must be identified according to the child's home address.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, children's social care must be contacted without delay.

Local Authority Designated Officer (LADO)

Where a concern or allegation about a person working with children may meet the harm threshold, the relevant LADO must be contacted in accordance with Section 12.

LADO advice must be sought without delay and within one working day where an allegation may meet the harm threshold. The LADO may also be contacted for advice where it is unclear whether the threshold is met.

Schools, colleges and partner organisations

Where safeguarding concerns arise during work within a school, college or partner organisation, practitioners must also follow the relevant safeguarding arrangements for that setting.

Practitioners must know how to contact the setting's Designated Safeguarding Lead and understand its safeguarding reporting arrangements before commencing work.

Following another organisation's safeguarding procedure does not remove the requirement to follow Your Space Foundation's safeguarding arrangements.

Other safeguarding and professional contacts

Depending on the circumstances, safeguarding advice, notification or referral may also be required from:

- the Disclosure and Barring Service (DBS);
- the practitioner's relevant professional body or regulator;
- health or mental health services;
- Prevent/Channel arrangements;
- the NSPCC; or
- another statutory or specialist safeguarding service.

The Designated Safeguarding Team will determine or seek advice about the appropriate route where this is unclear.

Where internal safeguarding routes cannot appropriately be used

Where the concern relates to a member of the Designated Safeguarding Team, the alternative safeguarding lead must be contacted in accordance with Sections 5, 12 and 15.

Where both safeguarding leads are implicated, neither can act independently, or internal reporting would be inappropriate or insufficient to protect a child, concerns may be raised directly with the relevant external body, including children's social care, the LADO or police.

No practitioner requires organisational permission to contact a statutory safeguarding agency where they reasonably believe this is necessary to protect a child.

Appendix 2 – Record of Concern



Record of Concern

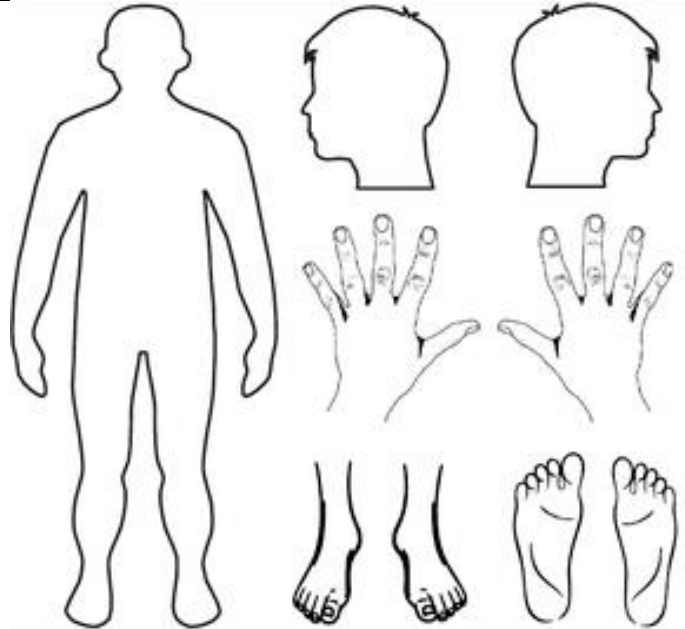
Completed forms to be filed and notification sent to the Safeguarding Manager / Team

Child:	Your name:
Location:	Position:

NATURE OF CONCERN/DISCLOSURE

What was disclosed? Please include where you were when the child made a disclosure, what you saw, who else was there, what did the child say or do and what you said.

Please indicate the location of any injuries on the body map and detail what the injuries look like below e.g size, colour etc.
(Mark and describe each injury separately)



Time & date of incident:

What have you already done?

Who have you shared this concern with?	
Who are you passing this information to?	
Name:	Position:
Your signature:	Date:
	Time:

FOLLOW UP FROM CONCERN / DISCLOSURE	
Name of Designated Safeguarding Officer receiving form:	Date received:
	Time received:
Action taken by Designated Safeguarding Officer:	
Was a referral made? Yes / No If no referral was made, why not? If yes, date and time of referral: MASH ☐ Police ☐ CAMHS ☐ Other ☐	
Were parents informed? Yes / No If not, please explain why	
Any further actions:	

Signature of DSO:	Date:

Appendix 3

Management Responsibility Flow Chart in the Event of a Safeguarding Concern

Responding to a Safeguarding Concern

