



Young Person Safeguarding Policy and Procedures

Date	September 2025	Responsible person	Director of Programmes
Next review	September 2026		

Related policies

- Safeguarding Policy
- Whistleblowing Policy
- Recruitment Policy
- Media Policy
- Data Protection Policy
- IT and Communications Policy
- Bullying & Harassment
- Sexual Harassment

This policy is available on the Charity's website. Linked policies and the documents in the appendices are available upon request.

Introduction

This document sets out the Sutton Trust's policy on the Safeguarding of Young People and its accompanying appendices are designed to provide Sutton Trust staff and relevant stakeholders with guidance and a set of procedures to follow to ensure adherence to this policy. It constitutes a more detailed analysis of what is 'safeguarding' in the context of our overarching Safeguarding Policy.

The first section sets out the policy itself which is publicly available on our website. The appendices then cover guidance and procedures and are available upon request. Any other linked documents or policies referred to form part of our Staff Handbook and are available upon request.

Safeguarding is the responsibility of all adults working with children (defined to be under the age of 18) and vulnerable adults. The Sutton Trust has a duty both in law and as a responsible organisation, to take reasonable care of both children and adults at risk coming into contact with us via our programmes, research or other work.

All participants involved in Sutton Trust programmes, research or other work which are aimed at young people are considered under the remit of safeguarding. This means that the guidance outlined here applies even where some participants may be over the age of 18. Participants over the age of 18 on events where the majority of the participants are not, should not be treated differently.

Where there are variations to the guidance and procedures in this document for our Alumni who may be participating in alumni programmes, activities and events with us, this is explicitly stated.

The Sutton Trust aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children and adults at risk.

The purpose of this document is:

- a) to protect participants including children, young people and adults at risk who take part in our programmes, events and research.
- b) to provide staff and other parties with the overarching principles that guide our approach to protecting children, young people, and adults at risk.

The document will be reviewed annually by Director of Programmes as the Designated Safeguarding Lead, with recommendations for changes signed off by the Chief Executive and reported to the Board of Trustees

Young Person Safeguarding Policy

Definitions

Child is someone under the age of 18

Child abuse is when any child is being harmed. Abuse can include physical, sexual, or emotional abuse, or take the form of neglect.

Working with children is defined as those who are engaged in an activity on behalf of or funded by us that involves direct contact with, or facilitates access to, children.

Adults at risk refers to those aged 18 or over who:

- have needs for care and support (whether or not these needs are being met)
- Are experiencing, or are at risk of, abuse or neglect
- As a result of their care and support needs, are unable to protect themselves from harm or the risk of harm

Adult abuse and neglect refers to any action or lack of action that causes harm, distress, or exploitation to an adult. This can take the form of neglect, self-neglect, physical abuse, sexual abuse, psychological or emotional abuse, financial and material abuse, organisational abuse, discriminatory abuse, modern slavery and domestic abuse.

Participant refers to individuals that take part in a Sutton Trust programme [aimed at school and college - aged young people] or research project. Some participants are under 18 and others are over 18. The procedures outlined in this policy apply to all participants.

Alumni refers to individuals that have completed a Sutton Trust programme and are over the age of 18.

Legal Framework

This policy has been based on law and guidance that seeks to protect children and adults, namely:

- Children Act 1989 (and 2004 amendment)
- United Convention of the Rights of the Child 1991
- The Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Sexual Offences Act 2003
- Protection of Freedoms Act 2012
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education 2024
- Safeguarding and Protecting People for Charities and Trustees 2021
- Keeping Children safe in out-of-school settings Code of Practice 2021
- Online abuse [Preventing online harm and abuse | NSPCC Learning](#)
- Bullying [Protecting children from bullying and cyberbullying | NSPCC Learning](#)
- Child protection [Child protection system in the UK | NSPCC Learning](#)
- Information Sharing Advice for Safeguarding Practitioners 2024
- Care Act 2014
- Care and Support Statutory Guidance 2024
- Please note this list in is not exhaustive and does not preclude other legislation and frameworks having relevance to our practices.

National differences

England, Northern Ireland, Scotland, and Wales each have their own safeguarding systems and laws to help protect children, young people and adults at risk from abuse and neglect. Although the systems are different in each nation, all are based upon similar principles. Key differences are explained in further detail in the appendices.

Scope of Policy

This policy applies to all staff and parties working with participants of Sutton Trust programmes or research work on activities organised and/or delivered by the Trust. This includes senior managers, trustees, board members, Fellows, paid staff, freelance contractors, volunteers, work experience providers and visitors to our programmes (such as donors) or anyone working on behalf of The Sutton Trust.

The term safeguarding is used to define actions taken to protect vulnerable groups from harm. This harm might come from adults or other children, and it is important for all staff and parties working with the Trust to understand what safeguarding is and why it is important.

In the case of a partner organisation using their own safeguarding policy, this should be of similar standard to that of best practice for the sector.

Policy Statement

The Sutton Trust believes that a child, young person or adult at risk should never experience abuse of any kind. We all have a responsibility to promote the welfare of all children and young people and to keep them safe on our face-to-face programmes and online, as well as

in any research work carried out by Sutton Trust. We are committed to practice in a way that protects them.

We Recognise That:

- The welfare of the child is paramount, as enshrined in the Children Act 1989
- In the same way, we acknowledge that the best interests, welfare and safety of all participants should always be at the heart of all that we do.
- All participants, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse
- Some participants experience additional vulnerabilities to abuse, and/or additional barriers to recognising and reporting abuse.
- Our face to face and online programmes, as well as our Research work, present opportunities for young people; however they can also present challenges and risks
- The risks of face to face and online programmes are not always the same and both need attention
- All staff and volunteers who come into contact with participants have a duty to remain alert to their needs and any risks of harm
- The Sutton Trust's staff and Trustees have a responsibility to report concerns about any participant or adult to the relevant authorities
- Working in partnership with children, young people, parents / guardians and other agencies is essential in promoting young people's welfare

We Will Seek to Keep Participants safe by:

- Valuing them, listening to and respecting them
- Appointing Designated Safeguarding Officers (DSO) and a wider Safeguarding Team of Deputy Designated Safeguarding Officers consisting of senior leaders and managers.
- Adopting Child-centred safeguarding policies, procedures and practices and ensuring they are known and following throughout the organisation.
- Developing and implementing effective online safeguarding procedures.
- Ensuring Safer Recruitment Processes are in place and ensuring all necessary checks are made
- Completing a risk assessment process which involves identifying risks and means of reducing or eliminating these;
- Implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis;
- Ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate
- Ensuring that images of children and young people are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- Providing effective management for staff through supervision, support and training
- Having at least two adults present when working with or supervising children and young people
- Maintaining a ratio of at least one adult to ten children aged 13 years and upwards, as per NSPCC guidelines
- Sharing information about child protection and good practice with children, parents, staff and volunteers

- Sharing concerns with agencies who need to know, and involving parents, carers and children appropriately
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- Ensuring we have effective complaints and whistleblowing measures in place
- Ensuring organisations that run programmes on our behalf or in partnership with us have safeguarding policies in place, follow the highest level of practice and take all possible steps to limit the likelihood of abuse towards participants and vulnerable adults

Sutton Trust Safeguarding Contacts

The Sutton Trust have appointed two Designated Safeguarding Officers, and two Deputy Safeguarding Officers who are trained by the NSPCC. They will be supported by the Chief Executive, who reports directly to Trustees. See the appendices for additional contacts.

Please contact safeguarding@suttontrust.com.

Designated Safeguarding Officers	Katy Hampshire Director of Programmes Out of hours: 07495023259	Vicki Baddeley Senior Programmes Manager
	Policy, training, serious case management and investigation sign off	Policy review, internal training, policy implementation, case management
Deputy Safeguarding Officers	Jon Datta Head of University Access & Digital	Claire Maton Head of Employability Programmes
	Policy implementation and case management	
Senior lead	Nick Harrison CEO	
	Serious incident sign off, cases involving staff members, reporting to Trustees	
Lead Trustee for safeguarding	Erica Wax Trustee	
	Strategy, Organisational culture, serious incident review, cases involving senior staff	

In any interim period of absence of CEO and/or Director of Programmes, the Senior leadership team (SLT) will take on the Safeguarding lead role to support DSOs with decision making, risk management and reporting to charity commission, where needed.

Procedures for Dealing with Disclosures and Reporting

In case of emergency or if a young person is in immediate danger (i.e. where there is certain, immediate and/or significant danger to an individual, an individual has suffered or is likely to suffer significant harm, or a criminal act has been witnessed), call the emergency services first and inform the DSO as soon as possible.

Where the situation is not an emergency, if you have concerns about the welfare of a young person, you should report this to the DSO as soon as possible - see the appendices for guidance on types of abuse and indicators.

A young person may disclose to you directly i.e. share information with you, or you may see something that concerns you, for example in a message online. If this happens please follow the steps below:

- **Remember the welfare of the young person is paramount**
Ensure that the young person is safe in the immediate space.
- **Listen carefully to the individual**
Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the young person to 'shut down', retract or stop talking. Do not interrupt or ask leading questions.
- **Let them know they've done the right thing**
Reassurance can make a big impact to the young person who may have been keeping the abuse secret.
- **Explain what you'll do next**
If age appropriate, explain to the young person you'll need to report the abuse to someone who will be able to help. **You must make sure you do not promise to keep it a secret**, you have a responsibility to report any abuse.

Reporting a Disclosure

- **Don't delay reporting the abuse**
Report to the DSO as soon as possible so details are fresh in your mind and action can be taken quickly. You do not have to be sure that abuse has taken place to report something, and it is not your role to investigate whether abuse has taken place. Do not approach the person who may be the abuser.
- **Make a written account as soon as possible**
Where possible, use The Trust's Safeguarding Report Form which can also be accessed through Quick Links on the Sutton Trust Portal. If you do not have access to the form, please make a written account and write this up into the safeguarding incident form as soon as possible. Include the date, time, location and a description of the conversation. Keep it factual e.g. not 'the student seemed upset'.
- **Your DSO will advise on next steps**
- **Keep the disclosure confidential**
Dealing with disclosures can be challenging and you may wish to talk about your experience. Your DSO will support you with this. Please do not disclose the information to others who do not need to know so that we can protect the confidentiality of the young person.

Other Concerns

Reporting Welfare Concerns

If you have concerns about a young person's welfare or behaviour, but they have not made a direct disclosure you should still report this to the Designated Safeguarding Officer and make a written record, where appropriate. If you're unsure whether to report your concern, always seek advice from a DSO. You do not need to be sure to raise a concern.

Reporting Female Genital Mutilation

If you are worried that a young person may be at risk of FGM you can make an anonymous call to the NSPCCs free 24-hour FGM helpline on 0800 028 3550 or email fgmhelp@nspcc.org.uk. Concerns should also be reported to your DSO.

Reporting Radicalisation

If you think a young person is in danger call the police on 999 or call NSPCC on 0808 800 500 straight away. Concerns should also be reported to your DSO.

Reporting Historic Abuse

If you have concerns related to non-recent (historic) abuse on a Sutton Trust programme, this should still be reported. In this case, this will be treated with the same seriousness as recent abuse and our safeguarding procedures will be followed.

Upon receiving a concern, the DSO will:

- Asses any immediate risks to the young person, including consideration of any changes needed to programme delivery
- Review the available information to identify indicators of abuse, neglect or harm and assess whether the concern meets the threshold for referral
- Seek advice if needed, including from the school or college, Local Authority Children's Social Care team, the Local Authority Designated Officer (LADO), or other safeguarding professionals
- Decide whether to escalate the concern through a safeguarding referral to children's social care, the police, or other appropriate agencies
- Where a referral is not made, ensure appropriate monitoring and support is provided and signpost to relevant support services
- Keep a clear and confidential record of the concern, decision, and any actions taken

Data Protection and Information Sharing

Where personal data is required to be processed in conjunction with safeguarding action according to this policy, the processing activity must be undertaken in accordance with our data protection policy.

Data Protection is not a barrier to sharing concerns about a child or an individual at risk. You should make a note in the safeguarding report of any express wish not to share the information but not let this prevent you from sharing. If you have any concerns about information sharing, contact the NSPCC helpline for advice. For guidance on information

sharing, see: [DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers.](#)

Lawful Basis:

When a safeguarding incident takes place, it may be difficult to gather consent because the priority is to ensure safety of the individuals. If there's a risk of harm to a child or vulnerable adult, their safety takes priority over confidentiality. _

In such circumstances mentioned above, in order to comply with our duty of care and safeguarding, our organisation would process information raising safeguarding concerns and share them with relevant authorities when required, based on the lawful basis of Vital Interest, or legitimate interest, read with substantial public interest and conditions from the legislation (Eg. Safeguarding of children and of individuals at risk/ Safeguarding of economic well-being of certain individuals)

Data Subject Rights:

Data subjects' rights and other UK GDPR provisions may be restricted when concerning personal data processed for safeguarding incidents. Some exemptions that may apply include. Examples of exemptions that might apply in the circumstances of safeguarding are defined under the UK GDPR such as the Crime and Taxation, the Rights of Others and Child Abuse Data.

Record Keeping

Safeguarding report forms will be saved on the shared drive in a locked folder, accessible to DSOs and CEO. These will be retained for 7 years, after which details will be redacted to show student in question and outcome of the incident.