



# Safeguarding policy

## 1. Policy statement and scope

REUK runs a number of services involving children and young people working 1:1 and in groups with staff and volunteers, including mentoring, casework, advice, guidance and support programmes, workshops and social activities, and research including interviews and focus group discussions.

**This policy is a statement of our commitment to ensure that those benefiting from, or working with, Refugee Education UK (REUK), are not harmed in any way through contact with it.** This specifically includes protecting children and young people who participate in REUK's services or activities. The principles set out here will be implemented in all services and activities involving children and/or young people.

This policy has been drawn up on the basis of law and guidance that seeks to protect children and young people, as listed in the appendix.

## Our commitments

To keep children and young people safe, REUK:

- takes a holistic approach to safeguarding which includes the promotion of wellbeing in addition to the prevention of harm;
- recognises that the welfare of a child and/or young person is paramount and has priority over all other interests;
- respects the rights, wishes and feelings of children and/or young people, ensuring that they are listened to and respecting the rights of young adults (over 18s) to retain personal choice about how they will respond to being abused or the risk of abuse, subject to our legal responsibilities;
- works in partnership with children, young people and their parents, carers, families and supporting professionals to promote their welfare;
- acknowledges that some children and/or young people are additionally vulnerable, including the particular group of children and young people that we support, because of the impact of previous experiences, their level of dependency, communication needs, immigration status or other issues;
- aims to develop the ability of children and/or young people to communicate themselves by building their self-esteem, confidence and language skills; and

- works together with other agencies, including social care services, the independent Local Authority Designated Officer (LADO) and any other agency that may be involved with a child and/or young person, in the prevention, identification, investigation and treatment of alleged, suspected or confirmed abuse.

## To keep children, young people, staff and volunteers safe, REUK:

- recognises that all people without exception have the right to protection from abuse regardless of age, gender, ethnicity, disability, beliefs, sexual orientation or immigration status and all other personal and protected characteristics, as set out in our Equality, Diversity and Inclusion Policy;
- acknowledges that we have a duty not only to protect children and/or young people from abuse, but also to protect staff and volunteers from situations that may lead to an allegation of abuse;
- supports staff and volunteers in the recognition and reporting of safeguarding issues by providing access to appropriate training, supervision and support;
- commits to the safe recruitment, selection and vetting of trustees, staff and volunteers;
- provides a safe physical environment by applying health and safety measures and carrying out risk assessments;
- records and stores information professionally and securely;
- embeds a culture of safeguarding awareness and openness across our organisation through regular discussion of safeguarding good practice, frequent supervision and the dissemination of good practice and changes in policy and legislation throughout the organisation.

Further details of what these commitments look like in practice can be found in the policy and procedure documents listed in section 1.

## Scope

**All trustees, staff, volunteers and other individuals working with or on behalf of REUK are responsible for working in line with this policy.**

Staff should also refer to our Child Protection Procedures and Over 18s Safeguarding Procedures. These contain additional definitions, guidance about assessing safeguarding situations and links to REUK's safeguarding incident reporting form.

## 2. Definitions

**Abuse** means the physical, verbal, psychological or emotional mistreatment of another person. It may include single or repeated acts; be physical, verbal, psychological or emotional; be an act of neglect or an omission to act; be intentional or unintentional (and can result from lack of knowledge); or occur when a child or young person is persuaded to

enter into a financial arrangement or relationship to which they have not, or could not have, consented.

Tailor these definitions to reflect the specific risks faced by refugee children, especially those in vulnerable living situations.

**Child** means anyone up to the age of 18 years. This term may include particularly vulnerable groups including Looked After Children (LAC), refugees, asylum seekers and survivors of trafficking.

**Child abuse** means the physical, verbal, psychological or emotional mistreatment of a child. Descriptions of different forms of child abuse can be found in REUK's Child Protection Procedures which set out how this policy's commitments are outworked in practice.

**Child protection** means protecting children from abuse, and identifying and stopping abuse that might already be happening.

**Safeguarding** means ensuring that those benefiting from, or working with, a charity, are not harmed in any way through contact with it.

**Staff** means any and all paid employees of REUK.

**Trustee** means any person on the board of trustees of REUK.

**Volunteer** means any person who donates time and/or services to REUK.

**Young person** means anyone up to the age of 25 years and may include particularly vulnerable groups including care leavers, refugees, asylum seekers and survivors of trafficking. (Occasionally REUK supports young people over the age of 25; this policy and the processes outlined in our adult protection procedures will apply to any young people who use our services, including those over 25.)

## 3. Safeguarding roles, responsibilities and contact details

### Roles and responsibilities

**All staff, trustees and volunteers are expected to take responsibility for safeguarding,** including recognising signs of abuse, maintaining a safe environment for children and young people, and reporting concerns appropriately.

**REUK's safeguarding team,** comprising the Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Lead (DDSL) and a representative from each pillar of work (Education Access, Education Thriving and Education Change) and the Facilities team, meets on a regular basis to discuss concerns which straddle programmes, discuss

complex cases, assess trends and organisational risk, and monitor compliance with and effectiveness of our safeguarding practices.

The DSL and DDSL are both members of the Senior Leadership Team (SLT) and escalate concerns to the Chief Executive and the Board as needed. There is a **Lead Safeguarding Trustee** who acts as a conduit between the Safeguarding subgroup and the wider Trustee Board. They can also be contacted with any concerns involving the DSL or DDSL.

## Contacting REUK about safeguarding

Any questions about REUK's safeguarding should be directed, in the first instance, to [safeguardingteam@reuk.org](mailto:safeguardingteam@reuk.org). This email address is accessible to all members of the safeguarding team.

More confidential questions or concerns can be directed to [safeguarding@reuk.org](mailto:safeguarding@reuk.org). Messages to this account are only visible to the DSL and DDSL.

These team members, along with the Lead Safeguarding Trustee can also be reached on the following phone numbers:

Designated Safeguarding Lead (DSL)	Deputy Designated Safeguarding Lead (DSL)	Lead Safeguarding Trustee
Emily Bowerman (Chief Programmes Officer)	Andrew Cooper (Head of Education Thriving)	Mark Nash (trustee)
+44 7481 915 870	+44 7858 179 842	+44 7525 777155

## 4. Safeguarding training

Generalised safeguarding training typically covers the following forms of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse and exploitation
- Neglect
- Bullying and harassment
- Domestic violence

REUK's internal training goes into more depth on the particular safeguarding vulnerability of refugee children and young people, including:

- Child trafficking and exploitation
- Radicalisation or extremism
- Online safety and digital safeguarding

- The impact of trauma and mental health challenges
- Contextual safeguarding and risks of extra-familial harm

### **Our training also**

- **Takes a trauma-Informed approach, recognising that** many refugee children may have experienced trauma and ensuring that staff are trained to respond to trauma with sensitivity and care.
- **Seeks to be culturally sensitive**, ensuring that safeguarding procedures respect and acknowledge cultural differences and that any interventions are culturally-appropriate and do not further marginalise those involved.
- **Informs staff about specialist services**, helping them understand the scope of their remit and expertise and how to refer to other specialist agencies.

### **Trustees, staff and volunteers should have appropriate training, at different levels and frequency depending on particular individual roles.**

#### **All volunteers**

- REUK's Safeguarding Policy, Child Protection Procedures and Over 18 Protection Procedures
- REUK's new volunteer training which explains REUK's policies and procedures and addresses any questions raised

#### **All staff**

- REUK's Safeguarding Policy, Child Protection Procedures and Over 18 Protection Procedures
- REUK's internal staff training which explains REUK's policies and procedures and addresses any questions raised
- A generalist safeguarding course (including training in recognising symptoms of abuse), such as Thirtyone:eight's 'Facing the Unthinkable' training and those offered by the relevant Local Safeguarding Children's Board
- E-learning training on Prevent
- Internal safeguarding refresher training every year

#### **All trustees**

- REUK's Safeguarding Policy, Child Protection Procedures and Over 18 Protection Procedures
- REUK's internal trustee training which explains REUK's policies and procedures and addresses any questions raised
- Refresher training every three years

#### **Lead Safeguarding Trustee**

- As above, plus additional external training about trustee responsibilities for safeguarding
- Refresher training every two years

#### **DSL and DDSL**

- As above, plus additional training for those with organisational responsibilities for safeguarding
- Refresher training every two years

## **5. Steps to ensure people's safety**

We take a range of steps to ensure the safety of all those engaging with REUK. These include:

### **Safer recruitment and selection procedures**

All trustees, staff and volunteers are subject to enhanced DBS checks (as permitted by law) and references. Where applicable, overseas criminal records checks may also be conducted. DBS checks will be updated every 3 years.

All recruitment follows the detailed procedures set out in REUK's [Safer Recruitment Policy](#), which requires, amongst other steps, face-to-face interviews, references and appropriate training and induction.

### **Risk assessments and safe environments**

We regularly assess and manage risks in physical settings (including activities taking place in our offices, meeting rooms and other community spaces) to prevent harm or injury. Risk assessments are conducted for all place-based activities.

When facilitating off-site activities, such as trips or excursions, we carry out safeguarding risk assessments which include ensuring appropriate staff-to-child ratios, informed consent from parents/guardians, and safety measures for all activities.

Recognising the wide use of technology including AI, we also consider how to protect people in online environments, including by addressing online safety in our safeguarding training and providing guidance on safe online behaviour.

# Developing a culture of safeguarding

We are committed to developing a culture of safeguarding across REUK. This includes:

- Having strong mechanisms in place to monitor compliance with this safeguarding policy, including through regular meetings of the Safeguarding Team and by ensuring that safeguarding is a standing item in quarterly SLT reports to the Board.
- Delivering ongoing training to keep staff, volunteers and trustees up to date with best practices and changes in legislation
- Providing refresher training and facilitating regular safeguarding conversations to maintain awareness and ensure safeguarding practices remain a priority
- Regularly reviewing all our activities from a safeguarding lens to ensure that we are doing all we can to reduce the risk of harm
- Centering the voices of children and young people within the safeguarding process, including how children can report concerns and participate in decisions that affect their welfare.
- Ensure that safeguarding messages are communicated in ways that are age- and culturally-appropriate for children and young people. .
- Building strong working relationships with external experts, including social workers, legal authorities and other specialist organisations to provide joined-up support to children and young people.
- Working in partnership with external statutory bodies, including local safeguarding boards, social services, police, and other relevant agencies.
- Engaging with parents/carers and all external partners in a transparent and supportive manner, ensuring that they are aware of REUK's safeguarding procedures.
- Soliciting input from staff, volunteers and young people about how to improve safeguarding practices and being receptive to feedback and willing to change.
- Ensuring that relevant consent (from parents, guardians and young people) is obtained when engaging with children and young people.
- Staying informed about changes in relevant legislation and guidance to ensure that our policies and practices are up to date and addressing emerging risks, including those related to AI and online safety.

# Keeping safeguarding central in partnerships

We frequently work in partnership with other organisations. When doing so, we ensure that safeguarding is given due attention to protect both the young people we work with and our organisational reputation.

When deciding whether to partner with an external organisation the following considerations must be met:

- All persons working with children or vulnerable adults must have an enhanced DBS check. We will accept DBS checks done by the partner organisation.
- All partner organisations must have an up to date safeguarding policy which should be shared with REUK and reviewed by the safeguarding sub group.
- A memorandum of understanding (MoU)/partnership agreement should be in place between the two organisations in which safeguarding arrangements are clearly stated.

## 6. Reporting Safeguarding Concerns

### How to report concerns

**Please note that if someone is at immediate risk of harm, the relevant emergency services should be contacted on 999.**

#### Safeguarding concerns from volunteers

- These should be reported in the first instance to the volunteer's primary contact at REUK (typically the Educational Mentoring Coordinator). The concerns will be discussed with the Educational Mentoring Coordinator's line manager and appropriate action will be taken.
- If the volunteer cannot reach their primary contact, they should contact the DSL or DDSL on the numbers above. Out of hours, volunteers can contact REUK's safeguarding line (01372 632033) which is accessed by members of the SLT on a rotating basis.

#### Safeguarding concerns from staff

- These should be reported to and discussed with their line manager. Together, the staff member and their line manager will decide appropriate next steps and take action.

- Staff should refer to our Child Protection Procedures and Over 18s Safeguarding Procedures for additional guidance about assessing safeguarding situations (including additional information about recognising signs of abuse, assessing how time-critical the safeguarding concern is and details about how to engage with and escalate situations to relevant statutory services).
- All safeguarding incidents are recorded, either on our CRM (Beacon) or via our organisation-wide safeguarding tracker (if the incident is related to someone who is not on the CRM). Incidents reported here are reviewed by the Safeguarding Group.

## Safeguarding concerns from others

Anyone else - such as members of the public, representatives of partner organisations, parents or carers - should report any safeguarding concerns directly to the Safeguarding Team (or to the Safeguarding Lead Trustee if the concern involves members of the Safeguarding Team). This can be done by phone or email (depending on the urgency and/or confidentiality) of the situation. All relevant contact details can be found above (in section 3).

## Whistleblowing

Our Whistleblowing procedures are set out in our Whistleblowing Policy which is publically accessible on our website.

Anyone can report concerns about REUK's safeguarding practices by following the steps set out there, without fear of retaliation.

## Confidentiality

We handle all information related to safeguarding with care and sensitivity, ensuring that disclosures are handled in compliance with data protection laws. More information about how we handle people's data and ensure records are securely stored is set out in our Privacy Policy (available on our website). Sensitive information is only shared with relevant authorities or individuals on a need-to-know basis.

## 7. Responding to safeguarding concerns

Staff members dealing with safeguarding concerns will follow the steps set out in Child Protection Procedures and Over 18s Safeguarding Procedures.

These documents include information about

- what steps should be taken immediately a concern is raised, including safeguarding measures to ensure the child or young person's immediate safety

- how to listen well to children and young people
- how to assess appropriate next steps (including how and when to involve parents/carers and local authorities)
- how to keep accurate and detailed record-keeping, particularly when safeguarding concerns are raised, including dates, facts, actions taken, and outcomes.
- external and statutory agencies for relevant external referrals

## 9. Reporting incidents and threats

When a safeguarding incident does not fall within the scope of our Child Protection and Over 18s procedures (such as a targeted or general threat of violence to REUK staff, young people or our building or a hate crime incident), it should be escalated **immediately** to a member of the Senior Leadership Team who will coordinate an emergency response.

## 10. Policy monitoring and review

This policy is approved and endorsed by the board of trustees. It is reviewed on a yearly basis, or more frequently if the relevant legislation changes or the activities of REUK change significantly.

Date of last trustee review	January 2026
Date of last SLT review	January 2026
Date of next trustee review	January 2027

# Appendix: Law and guidance

This policy has been drawn up on the basis of the following law and guidance that seek to protect children and young people.

## 1. Children Act 1989 and 2004

- **Children Act 1989:** This foundational piece of legislation provides the framework for the care and protection of children in England. It establishes the duty of local authorities to promote and safeguard the welfare of children in need and sets out the responsibilities of parents, carers, and professionals to protect children from harm.
  - **Section 17:** Outlines the duty of local authorities to provide services for children in need, including those at risk of harm.
  - **Section 47:** Requires local authorities to investigate when they suspect a child is suffering or is likely to suffer significant harm.
- **Children Act 2004:** Builds on the 1989 Act and focuses on improving the well-being of children and young people. It introduced the concept of **Every Child Matters**, which includes five outcomes:
  - Being healthy
  - Staying safe
  - Enjoying and achieving
  - Making a positive contribution
  - Achieving economic well-being
- The 2004 Act also emphasizes the importance of cooperation between agencies in safeguarding children and introduced the role of **Local Safeguarding Children Boards (LSCBs)**, which have since been replaced by **Safeguarding Partners** under the **Children and Social Work Act 2017**.

## 2. Working Together to Safeguard Children (2023)

- This statutory guidance<sup>1</sup> sets out how organizations and agencies should work together to safeguard and promote the welfare of children. It applies to all organizations working with children, including schools, charities, and health services.
  - **Safeguarding Partners:** The guidance outlines the roles of local authorities, police, and health services in safeguarding children and ensuring that they work together effectively to safeguard and promote the welfare of children.
  - **Child Protection Procedures:** Provides detailed guidance on how to respond to safeguarding concerns, including how to report suspected abuse and how investigations should be carried out.
  - **The Role of the Designated Safeguarding Lead (DSL):** Outlines the responsibilities of the DSL in schools, charities, and other organizations

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<sup>1</sup> Working together to safeguard children 2023 see: [https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working\\_together\\_to\\_safeguard\\_children\\_2023.pdf](https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf)

working with children to oversee safeguarding matters and ensure that concerns are appropriately addressed.

### 3. Safeguarding Vulnerable Groups Act 2006 (and the Disclosure and Barring Service)

- This act created the **Disclosure and Barring Service (DBS)**, which helps employers make safer recruitment decisions by checking the criminal background of individuals applying for jobs or volunteering with children.
- The **DBS** maintains the **Children's Barred List**, a list of individuals who are prohibited from working with children due to past harmful behaviors.
- **Safer Recruitment:** All staff, volunteers, and trustees who work with children must undergo **DBS checks** to ensure they are not on the barred list.
- **Regulated Activity:** Specifies what constitutes "regulated activity" for individuals working with children (e.g., teaching, training, care, or supervision of children).

### 4. The Children and Social Work Act 2017

- **Local Safeguarding Children Boards (LSCBs)** were replaced by **Safeguarding Partners** as of 2019. The Act requires local authorities, the police, and health services to work together in safeguarding children and to have a shared responsibility for ensuring the welfare of children in their local areas.
- **Child Safeguarding Practice Reviews:** This Act requires the Safeguarding Partners to undertake reviews following a child's death or significant harm to identify lessons that can improve practice and prevent future harm.

### 5. The Care Act 2014

- Although the **Care Act 2014** primarily focuses on adults, it also has implications for safeguarding children, particularly for those transitioning into adulthood (e.g., young people leaving care).
- **Duty to Safeguard Adults at Risk:** Local authorities have a duty to investigate safeguarding concerns for adults with care and support needs, which is relevant for young people with disabilities or special educational needs (SEN).

### 6. Data Protection and Privacy Laws

- **General Data Protection Regulation (GDPR)** and the **Data Protection Act 2018** govern how personal data, including sensitive information about children, should be handled.
- When safeguarding concerns are raised, charities must ensure that data sharing is done in accordance with these regulations, ensuring confidentiality and privacy rights are respected, while also fulfilling their duty to protect children.

### 7. The Human Rights Act 1998

- Safeguarding practices should also take into account the **Human Rights Act 1998**, which incorporates the European Convention on Human Rights into UK law. This

includes the right to life (Article 2), the right to not be tortured or subjected to inhumane treatment (Article 3), and the right to a private and family life (Article 8).

- Safeguarding children involves balancing these rights with the child's right to protection from harm.

## 8. The Equality Act 2010

- The **Equality Act 2010** prohibits discrimination, harassment, and victimization based on various protected characteristics, including age, disability, race, religion, and sex.
- Safeguarding policies should ensure that all children are treated fairly and that they have equal access to protection from harm, regardless of their background or characteristics.

## 9. Prevent Duty (Counter-Terrorism and Security Act 2015)

- The **Prevent Duty**<sup>2</sup> requires specified authorities, including schools and charities working with children, to have due regard to the need to prevent individuals from being drawn into terrorism.
- Charities must ensure that their staff and volunteers are aware of the signs of radicalization and know how to report concerns.
- **Channel Program**: A voluntary program that provides support to individuals at risk of radicalization, ensuring early intervention.

## 10. The Education Act 2002 (Section 175)

- This Act places a duty on local education authorities, maintained schools, and governing bodies to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.
- Charities involved in education must follow similar safeguarding duties, ensuring children's safety both in and out of school hours.

## 11. Other guidance

Other useful guidance/reference materials include:

- [Keeping Children Safe in Education \(KCSIE\)](#) - statutory guidance for schools updated in September 2025.

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<sup>2</sup> Prevent duty guidance updated in 2023:  
[https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258\\_HO\\_Prevent+Duty+Guidance\\_v5d\\_Final\\_Web\\_1\\_.pdf](https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258_HO_Prevent+Duty+Guidance_v5d_Final_Web_1_.pdf)