

SATRO POLICY

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1. Aim of Policy

The charity's responsibility to safeguard and promote the welfare of children is of paramount importance. The aim of this policy is to safeguard the young people we work with.

Our core safeguarding principles are:

- Safeguarding and promoting the welfare of children is everyone's responsibility
- Safer children make more successful learners.
- To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- To ensure consistent good practice.
- Policies will be reviewed annually, unless an incident or new legislation or suggests.

The principles on which this policy is based are:

- Welfare of the child is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All trustees/staff/associates/volunteers have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- Learners and those involved in disclosing child protection issues will receive appropriate support.

The key terminology used in safeguarding is:

Safeguarding and promoting the welfare of children refers to the process of protecting children from abuse or neglect, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

Child protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm. It also includes the dealing with child on child abuse.

Child refers to all young people who have not yet reached their 18th birthday.

Designated Safeguarding Lead (DSL) is the person appointed to take lead responsibility for child protection issues in a school or organisation. They ensure that safeguarding policies are followed and act as the first point of contact for any safeguarding concerns.

2. Responsibilities

It is the responsibility of every adult working with children to take the necessary safeguarding action in light of information that is shared with them or of which they become aware. In doing so you must be clear that you will be required to report any concerns.

Whilst at a school site it is the school's safeguarding policy that takes precedence in terms of action. Where SATRO staff/associates/volunteers deliver an activity on an ongoing basis in a school they will be made aware of these policies at the start of the year by the school and we ask schools to keep SATRO updated as to any changes. Reports of safeguarding issues on the school site should therefore be reported to the school's Designated Safeguarding Lead (DSL). This should include allegations regarding a member of staff at the school, unless it is about the DSL. In this case the report should be made to the SATRO Designated Safeguarding Lead (SATRO DSL), using the procedure outlined below.

It is the responsibility of all those working with SATRO to be aware of the risks that may present themselves in relation to their own situation whilst working with children. For example, remember you are in a position of authority as an adult, and that the trust which you are given must not be abused. You should not put yourself in the situation of being alone with a child, for example in a room with a closed door unless in agreement with the school, for instance mentoring sessions. Be aware that your responsibility in understanding safeguarding is also about protecting yourself from allegations.

The reporting of any safeguarding allegations by a member of SATRO staff or a volunteer should be highlighted to the SATRO DSL. It is important that the Charity is aware that a report was made and by whom, but the confidentiality of the report should be maintained at all times.

Where a notification is made directly to SATRO our internal Safeguarding Procedure will be followed including the process of recording information. It will be the responsibility of the SATRO DSL to contact the Local Authority Designated Officer (LADO) if required or necessary and to work in confidence with those involved. In the event of the SATRO DSL being unavailable the Deputy DSL will take on responsibility.

Key contacts in this regard are:

SATRO DSL: Andrew Whitby-Collins safeguarding@satro.org.uk 01483 688070

Deputy DSL: Mo Forgan safeguarding@satro.org.uk

Surrey LADO cspa@surreycc.gov.uk 0300 470 9100

3. Recognising Safeguarding Issues

You need to note the following definitions and should pass on any concerns to the DSL in the host school, and to the SATRO DSL, depending on the circumstances.

Abuse may be described as:

“An act, or failure to act, by the person responsible for the care of the child. It may involve cruelty, exploitation or neglect.”

Abuse takes many forms. *"Working Together to Safeguard Children"* (2023) and *Keeping Children Safe in Education* provide key definitions:

Abuse - a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

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

Child protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm. It also includes the dealing with child on child abuse.

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

Controlling or coercive behaviour - Also known as coercive control, controlling or coercive behaviour is a form of domestic abuse.

Controlling or coercive behaviour is a pattern of abuse (on two or more occasions) that involves multiple behaviours and tactics used by a perpetrator to (but not limited to) hurt, humiliate, intimidate, exploit, isolate, and dominate the victim. It is an intentional pattern of behaviour used to exert power, control, or coercion over another person. Controlling or coercive behaviour is often committed in conjunction with other forms of abuse and is often part of a wider pattern of abuse, including violent, sexual, or economic abuse. Children can be used to control or coerce the victim, for example, by frustrating child contact and/or child arrangements, telling the children to call the victim derogatory names or to hit the victim, or by threatening to abduct the children.

This pattern of abuse causes fear, serious alarm and/or distress which can lead to a substantial adverse effect on a victim's day-to-day life. This can have a significant impact on children and young people.

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

Domestic abuse - may be a single incident or a course of conduct which can encompass a wide range of abusive behaviours, including a) physical or sexual abuse; b) violent or threatening behaviour; c) controlling or coercive behaviour; d) economic abuse; and e) psychological, emotional, or other abuse.

All children can experience and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members, including where those being abusive do not live with the child. Experiencing domestic abuse can have a significant impact on children.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as teenage relationship abuse. Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

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

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

Female Genital Mutilation - FGM is the partial or total removal of the external female genitalia for non-medical reasons. It is child abuse and is illegal in the UK. It can be extremely dangerous and can cause severe pain, shock, bleeding, infection such as tetanus, HIV and hepatitis B and C, organ damage, blood loss and infections and death in some cases.

Financial exploitation - Financial exploitation can take many forms. In this context, we use the term to describe exploitation which takes place for the purpose of money laundering. This is when criminals target children and adults and take advantage of an imbalance of power to coerce, control, manipulate or deceive them into facilitating the movement of illicit funds. This can include physical cash and/or payments through financial products, such as bank and cryptocurrency accounts.

Maltreatment - All forms of physical and/or emotional ill-treatment, sexual abuse, neglect, or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

Neglect - The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

Online safety – A broad and ever evolving category which can be divided into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Peer on Peer Abuse - is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);

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

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

Serious violence - Serious violence covers specific types of crime, such as homicide, knife crime, and gun crime, and areas of criminality where serious violence or its threat is inherent, such as in gangs and county lines drug dealing. It also includes crime threats faced in some areas of the country such as the use of corrosive substances as a weapon.

Sexual abuse - Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online,

and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

4. Children Absent from Education

An increasing issue for schools is the growing percentage of children who are absent from education ('persistent absence'). Those absent for prolonged and/or repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and criminal exploitation particularly county lines. Any disclosure that leads you to have concern in this respect should be immediately reported through the school's safeguarding policy as it helps prevent the risk of them becoming a child missing education in the future.

5. Working in Schools

As the majority of SATRO's delivery will take place within a specific school we will work to the policies and procedures including safeguarding, online safety, behaviour and the reporting of that school. At all times we ask a member of school staff to be present, or in the case of mentoring to be proximate, to manage and lead action related to the said policies.

We endeavour to use school IT equipment in the delivery of our workshops/sessions/events if possible but also take our own IT equipment into schools. In this case we request access to school Wi-Fi to ensure that activity by students is monitored and filtered in line with school policies. We will report any misuse by students directly to the host school, and in the case of multi-school events to the representative of the school which that student attends.

6. Reporting Concerns

If you have found yourself in the position of receiving a child's confidence and declaration of concern or have recognised the signs of abuse which cause you concern you must report them. You cannot offer to 'keep them secret'. It is your responsibility to inform the relevant person of your concern so that action may be taken where necessary.

Those working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

In any discussion with a child you should:

- **Receive** – listen to what is being said, take it seriously and make note as soon as possible.

- **Respond** – do not ask leading questions, criticise or ask why, simply respond as far as is necessary to clarify your understanding and establish whether or not you need to report the matter.
- **Reassure** – tell the child that they have done the right thing by letting you know what has happened. Let them know what you are going to do next and be clear that you must report what you have been told. Do not make promises you are unable to keep – for example you cannot promise to stay with them or to keep it confidential.
- **Report** – share your concerns as soon as possible to the school DSL or DDSL. In the case of an allegation against the DSL to the SATRO DSL.
- **Record** – make brief notes at the time. This should record time, place, persons present, behaviour of the child and actual words used where possible. Record facts and observations only. Sign and date the document.
- **Remember** – support the child by listening and reassuring, share your knowledge only with an appropriate professional. Also remember to get some support for yourself if necessary.
- **Review** – this should be led by the DSL and report any weaknesses you may have identified in the process and whether further training is required.

You should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent you from having a professional curiosity and speaking to the school's Designated Safeguarding Lead (DSL) if you have concerns about a child.

At all times victims should be taken seriously, kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately through the school's procedures.

You should speak to the school's DSL with regard to any concerns about female genital mutilation (FGM), and it should be noted there is a specific legal duty on teachers to report any act of FGM to the police.



Data Protection legislation does not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

SATRO Reporting Safeguarding Concerns

Name of person/s about whom safeguarding concern is raised	
Location and event at which it took place	
Date & Time of incident	
Name of person reporting the incident to SATRO	
Position and contact details of person reporting incident inc. phone and email	
If reported by a school, organisation or authority, do you understand what action is being taken and what is expected of SATRO? Also does the person about which the incident is being reported know?	
If reported by an individual directly to SATRO, explain that the information will be dealt with by our safeguarding policy and will be reported accordingly to the relevant organisations e.g. school, local authority safeguarding officer	
Person in SATRO receiving the report and position	
Date and Time report received	

Reason for Safeguarding Report	
Who? - Who was involved? - Were there witnesses? - Was it reported?	
What? - What is the allegation? - What has been disclosed? - Have any actions been taken?	
Where? Where did it happen?	
When? - When did it happen? - When was it reported?	
Why? Has an explanation been given as to why it happened?	
Any Further Information	
Reported To	
Proposed Action	
Signature	

7. Whistleblowing

SATRO staff should refer to the Staff Handbook for the procedure regarding concerns or allegations to do with colleagues within SATRO – whistleblowing. However, please remember that any immediate concern must be reported to the school.

8. Safer Recruitment

SATRO endeavours to ensure that we employ staff or engage associates/volunteers following the guidance of Safeguarding Children and Safer Recruitment in Education. This means that all applicants for staff positions will:

- Complete an application form
- We will seek two references
- Provide evidence of identity (inc. photo ID)
- Provide evidence of the right to work in the UK
- Be interviewed
- Enhanced DBS checked

Interview panels involved in recruitment will have a member with Safer Recruitment training.

9. Safeguarding Training

SATRO staff, trustees and associates receive regular Safeguarding Children training, renewed every 3 years. In the interim regular safeguarding updates are provided annually. Tutors working regularly in schools have updates and training as part of an annual induction day at the start of the academic year.

This training should equip Trustees with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust approach to safeguarding. Their training will be regularly updated.

Specific Designated Safeguarding Lead (Level 3) training is provided to the SATRO DSL.

10. Volunteers

Volunteers supporting students in a 1:1 situation or committing to a longer term programme are DBS checked at the Enhanced level. In the case of a volunteer attending a single session they will be supervised at all times in accordance with host school policy.

As part of our mentoring scheme, an academic year commitment, the volunteers will in addition receive an induction and safeguarding training from one of our Mentoring Team. This team have both

Train the Trainer, Safeguarding and Mental Health First Aid training related to the programme. All volunteer mentors will be made aware of the school's safeguarding policy and will be given details of the school's DSL.

11. Photography & Images

No photographs or images should be taken of a learner unless the school has provided express permission on our Media Permission Form. This will also outline the level of use permitted for any images e.g. for portfolio work or whether publication is allowed. If in doubt it is best practice to ask permission on the day for anything other than course work.

All images should be uploaded to the secure server in the office as soon as possible and deleted from a mobile device to ensure compliance with GDPR.

12. Reference Documents

Click on the text below for links to each document:

[Keeping Children Safe in Education, Statutory guidance for schools and colleges, September 2025, Department for Education](#)

[Working Together to Safeguard Children, December 2023](#)

Appendix A Internal Safeguarding Reporting Procedure

A call or email is received in the SATRO office regarding a safeguarding incident the following action will be taken:

1. The call or email should be escalated to the SATRO DSL, or in his absence the DDSL. If not available, a report will be completed by the senior staff member present.
2. The completed Safeguarding Report should be forwarded with urgency to the SATRO DSL or DDSL for immediate action. Any hard copy should be kept in a locked filing cabinet.
3. A decision will be made to as to when the member of staff, associate or volunteer can be informed of the report, and whether they are withdrawn from activities during an investigation.
4. All incidents and reports will be kept strictly confidential at all times.
5. SATRO will comply with the safeguarding policies of any reporting organisation, giving full cooperation.
6. SATRO will manage direct incidents through internal procedures in collaboration with other organisations and authorities as required and advised.