PROSPERO GROUP

Safeguarding Children & Adults at Risk Policy

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Introduction

Safeguarding is everyone's responsibility. Prospero Group acknowledges the duty to safeguard and promote the welfare of Children and Adults at Risk; and is committed to ensuring safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements. All Children and Adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.

This policy applies to all Internal Employees and Temporary Workers and, will be widely promoted and be mandatory for everyone involved in Prospero Group. Failure to comply with this policy and Prospero Group's safeguarding procedures may result in disciplinary action being taken, including termination of employment and/or contract.

All Temporary Workers placed by Prospero Group are expected to familiarise themselves with arrangements for safeguarding Children and Adults at Risk in the organisation where they are placed and to have a clear understanding regarding abuse and neglect in all forms; including how to identify, respond and report.

Prospero Group expect all Internal Employees and Temporary Workers to follow and promote good practice in safeguarding. In order to do so, they should:

- Read, understand, accept and act in accordance with this policy.
- Be vigilant and follow professional codes of conduct to maintain professional boundaries and safe working practices.
- Report any concerns or disclosures related to the protection and safety of Children and Adults at risk.
- Undertake mandatory safeguarding training and awareness sessions where provided.
- Help educate learners/Service Users in placements regarding matters of keeping safe, including acting as a good role model.

Confidentiality and Information Sharing

Prospero Group recognises the importance of confidentiality and will ensure that information is shared appropriately and only with those who need to know. However, confidentiality cannot be guaranteed where a Child or Adult at Risk is experiencing, or is at risk of, abuse, neglect, exploitation or significant harm. Internal Employees and Temporary Workers must never promise to keep safeguarding concerns secret and should explain that information may need to be shared with safeguarding professionals, statutory agencies or the police in order to protect an individual from harm.

Definitions

Client – an organisation, which engages with Prospero Group to purchase Work-Finding Services. This includes, amongst others: Schools, Local Authorities, Care Homes, Universities, Parents/Carers and Private Sector organisations.

Internal Employee – is defined to mean a full or part-time employee of Prospero Group.

Prospero Group – is comprised of three entities: Prospero Teaching, Prospero Health & Social and Prospero Integrated.

Temporary Worker – an individual receiving Work-Finding Services, delivered by Prospero Group. This includes, amongst others: Teachers, Tutors, Teaching Assistants, Care Assistants, Support Workers and Nurses.

Work-Finding Services – taken to mean recruitment activity, advertising of roles and provision of work-related training, provided by Prospero Group.

According to the Children Act 1989, a '**Child**' is anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection under current legislation.

In this policy, the terms 'child' and 'young person', or 'children' and 'young people', are used interchangeably to refer to any individual under the age of 18.

The Care Act 2014 defines an '**Adult at Risk**' as an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and.
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a Child/Adult at Risk by inflicting harm, or by failing to act to prevent harm.

The Children Act 1989 defines '**harm**' as "ill-treatment or the impairment of health or development". 'Development' means physical, intellectual, emotional, social or behavioural development; 'health' means physical or mental health; and 'ill-treatment' includes sexual abuse and forms of ill-treatment which are not physical. As a result of the Adoption and Children Act 2002, the definition of harm also includes "impairment suffered by hearing or seeing the ill-treatment of another"

Abuse may be perpetrated by an individual from the child or adult's school, college, day centre, community, family, those in a position of trust or another Child/Adult at Risk.

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). This is most likely to include but may not be limited to: bullying (including cyberbullying), physical abuse, sexual violence, sexual harassment, up-skirting, sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals.

Signs of Abuse, Neglect and Exploitation – Children

Signs of abuse may vary depending on several factors. The following are some of the key indicators to be aware of:

- Unexplained changes in behaviour or personality changes
- Becoming withdrawn
- Seeming anxious
- Overly sexualised behaviour
- Becoming uncharacteristically aggressive
- Lacking social skills or having few friends
- Poor relationships with guardian
- Knowledge of information inappropriate to their age
- Going missing or absconding
- Choosing to cover their body
- Lack of cleanliness in their person or clothes
- Health issues
- Injuries that do not correlate with typical accidental injuries

Categories of Abuse, Neglect and Exploitation - Children

Child abuse can be one of four different categories as set out in Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (updated 2026):

- **Physical Abuse**: Physical abuse is 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.
- **Emotional Abuse**: The persistent emotional maltreatment of a child such as to cause severe and 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. This may include persistent criticism, belittling, humiliation, rejection, scapegoating, name-calling, intimidation or exposing a child to persistent hostility. 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 from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), 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, although it may occur alone.

- **Sexual Abuse**: Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape, oral sex, or penetration with an object) 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect**: Neglect is 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); or
    - ensure access to appropriate medical care or treatment.

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

For detailed guidance on the signs which may indicate abuse and neglect see 'What to do if you're worried your child is being abused (2015)'.

Signs of Abuse, Neglect and Exploitation – Adults at Risk

Signs of abuse may vary depending on several factors. The following are some of the key indicators to be aware of:

- Unexplained injuries and or bruising
- Slap, kick or finger marks
- Injuries at different stages of healing that do not suggest accidental cause
- Injury shapes similar to objects
- Weight loss and or complaints of hunger
- Appearing to be over medicated or lack of medication being administered
- Ulcers, bed sores or being left in wet clothing
- Deference to their carer
- Fearfulness expressed in their eyes, avoiding looking at carer
- Changes in appetite
- Unexplained paranoia
- Anxiety
- Agitations
- Changes in behaviour for no obvious reason
- Self-inflicted injuries

- Poor sleep patterns
- Frequent infections

Categories of Abuse - Adults at Risk

The categories of adult abuse are set out in the Care Act 2014 and are as follows:

- **Physical Abuse**: including assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions.
- **Domestic Violence**: including psychological, physical, sexual, financial, emotional abuse; so-called 'honour' based violence.
- **Sexual Abuse**: including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological Abuse**: including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Financial or Material Abuse**: including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Modern Slavery**: encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Discriminatory Abuse**: including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- **Organisational Abuse**: including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- **Neglect and Acts of Omission**: including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Self-neglect**: this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Further information can be found at https://www.gov.uk/government/publications/adult-safeguarding-statement-of-government-policy.

Mental Capacity Act 2005

This policy recognises the importance of respecting the rights and autonomy of Children and Adults at Risk when making safeguarding decisions. Central to this is the principle of informed consent, which must be considered in all safeguarding actions. The Mental Capacity Act 2005 (MCA) provides the legal framework for decision-making where there may be concerns about an individual's ability to make specific decisions for themselves. The MCA applies to individuals aged 16 and over and provides a framework for making decisions on behalf of those who may lack the mental capacity to make specific decisions at a given time.

The principles of the Mental Capacity Act are as follows:

- A person must be assumed to have capacity unless it is established that they lack capacity.
- A person is not to be treated as unable to make a decision unless all practicable steps to help them to do so have been taken without success.
- A person is not to be treated as unable to make a decision merely because they make an unwise decision.

- An act done, or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in their best interests.
- Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action.

Internal Employees and Temporary Workers must:

- Adhere to the principles of the MCA as outlined above.
- Ensure they understand the MCA and its application to safeguarding practice.
- Where the individual has been assessed under the MCA, ensure that any decisions made on behalf of a Service User prioritise their best interests. These decisions should take into account their past and present wishes, feelings, beliefs, and values. Additionally, they must be the least restrictive option that supports the Service User's wellbeing and should be made in consultation with all relevant stakeholders, including professionals involved in their care, family members, and advocates.
- Clearly document any decisions made relating to capacity, including rationale and steps taken to include the Service User in the decision-making process.
- Never make an assessment in line with the MCA of a Service User, unless explicitly instructed to do by Prospero Group.

Deprivation of Liberty Safeguards

The Deprivation of Liberty Safeguards (DoLS) are an integral part of the Mental Capacity Act 2025 and apply specifically to individuals residing in care homes or hospitals in England and Wales. DoLS aim to ensure that individuals who lack the mental capacity to consent to their care and treatment are protected from unlawful deprivation of liberty.

Key Principles

- **Protection of Rights**: DoLS ensure that individuals who cannot consent to their care arrangements are not deprived of their liberty without due process. These safeguards are in place to protect the rights of vulnerable individuals, ensuring that any restriction on their freedom is both necessary and proportionate.
- **Assessment**: If an individual is at risk of being deprived of their liberty, an assessment must be conducted. This includes assessments of mental capacity, eligibility, and whether the proposed arrangements are in the individual's best interests. The assessment process involves professionals such as social workers, doctors, and other relevant experts.
- **Best Interest**: Any care arrangements that may restrict an individual's freedom must be in their best interest. The deprivation of liberty should only be considered if it is necessary for the person's safety, well-being, and protection.
- **Authorisation**: If an assessment concludes that deprivation of liberty is necessary, an application for authorisation must be made to the appropriate supervisory body (such as the local authority). The authorisation must be reviewed regularly to ensure ongoing compliance with legal and ethical standards.

Reviewing and Monitoring

DoLS authorisations are time-limited and must be regularly reviewed. The reviews should assess whether the deprivation of liberty remains necessary and whether the individual's care needs or circumstances have changed. Regular monitoring will ensure that the individual's care arrangements continue to be in their best interest and that their rights are upheld.

Temporary Workers and Internal Employees must:

- Ensure that they are familiar with and understand Deprivation of Liberty Safeguards (DoLS).
- Be aware of the specific care arrangements and restrictions that may apply to individuals being supported under DoLS.
- Be aware of, and follow, the conditions placed upon a Service User's care and support and ensure these are adhered to in a way that respects the individual's rights while safeguarding their well-being.

- Report and accurately record any actions, incidents and/or breaches that are related to a Service User's DoLS.
- Work closely with other professionals involved in the assessment, care planning, and monitoring processes to ensure that the individual's care is consistent with DoLS requirements and their best interests.
- Participate in the regular review process of any DoLS authorisations (if required), ensuring that the individual's care arrangements continue to be necessary and proportionate.
- Ensure that individuals who may be affected by DoLS are informed of their rights, and where possible, support them to understand the restrictions in place and why they are being applied.

Commitment to Safeguarding

This policy is designed to meet the above principles by ensuring that:

- Prospero Group has robust safer recruitment processes that ensures that those who are known to be a risk to Children or Adults or Risk, do not gain access to them; those whose actions suggest that they are a risk to Children or Adults or Risk are detected at the earliest stage and prevented from continuing to work with Children or Adults or Risk; and that those who intend to do harm are prevented at every possible stage from entering the workforce.
- Internal Employees, Temporary Workers and, where applicable, Volunteers understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to Children and Adults at Risk.
- There is an open and transparent culture which enables Internal Employees and Temporary Workers to raise concerns around Children/Adults at Risk, those that work with Children/Adults at Risk, and processes within Prospero Group.
- It is as simple as possible for an individual to report concerns about harm or risk and clear procedures are implemented where safeguarding and Child/Adult at Risk protection issues arise. Where concerns are reported Prospero Group will ensure that individuals are supported.
- Prospero Group has robust policies and procedures in place, which are reviewed and updated at least every 12 months.
- Prospero Group stays up to date with developments on safeguarding best practice, reporting and auditing safeguarding activities annually and addressing any areas for improvement.
- Prospero Group will report any concerns regarding any individual, or any potential safeguarding situation that it becomes aware of as soon as practicable to the appropriate authority and will co-operate in any ongoing investigations or assessments.
- Prospero Group will work in partnership with other services (including local authority children's and adult social care) to ensure that those who are identified as being at risk of abuse are protected.
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

Prospero Group recognises that some Children may be at greater risk of harm, abuse, neglect or exploitation and may require additional support and safeguarding measures. This includes, but is not limited to, Children in Need, Children subject to Child Protection Plans, Children in Care, Children requiring mental health support, and Children with Special Educational Needs and Disabilities (SEND). Internal Employees and Temporary Workers should be aware that additional barriers can exist when recognising abuse, neglect and exploitation in these groups and should remain professionally curious and vigilant to signs of harm.

Prospero Group recognises that young carers may face additional challenges which can impact their education, wellbeing and safeguarding. Staff should remain alert to indicators that a child may have caring responsibilities and consider whether additional support or early help may be appropriate.

Prospero Group recognises the importance of early intervention and Family Help services in improving outcomes for children and families. Where concerns are identified, staff should support appropriate referrals and multi-agency working to ensure needs are identified and addressed at the earliest opportunity.

Where working in schools, Prospero Group recognises that safeguarding is everyone's responsibility. In line with Keeping Children Safe in Education 2026, all Internal Employees and Temporary Workers are expected to read Part One of the statutory guidance in full, regardless of whether they work directly with Children.

Multi-Agency Working

Effective safeguarding requires a coordinated and collaborative approach. Prospero Group recognises the importance of working in partnership with schools, colleges, local authorities, children's and adult social care, healthcare professionals, the police, safeguarding partnerships and other relevant agencies to identify, assess and respond to safeguarding concerns. Internal Employees and Temporary Workers are expected to share information appropriately, contribute to safeguarding processes where required and support multi-agency efforts to safeguard and promote the welfare of Children and Adults at Risk.

Local Safeguarding Procedures and Placement Requirements

Prospero Group recognises that safeguarding procedures may vary between Local Authorities, Safeguarding Partnerships, Safeguarding Adult Boards, Clients and placement settings.

All Temporary Workers and Internal Employees are required to familiarise themselves with, and follow, the safeguarding policies, procedures, reporting arrangements and escalation processes applicable to the setting in which they are working. This includes, but is not limited to:

- The Client's Safeguarding and Child Protection Policy.
- Reporting procedures and referral pathways.
- Local Authority Children's Social Care and Adult Social Care arrangements.
- Local safeguarding partnership procedures.
- Attendance, missing from education, absconding and welfare procedures.
- The identity and contact details of the Client's Designated Safeguarding Lead (DSL), Deputy DSL or other safeguarding professionals.

Where there is any difference between Prospero Group procedures and local safeguarding procedures, Temporary Workers should seek advice from the Client's DSL/DSO and Prospero Group's DSL/DSO without delay. Concerns should always be reported in accordance with local safeguarding procedures and to Prospero Group.

Relevant Legislation and Guidance

The principal legislation and guidance governing this policy is:

- Keeping Children Safe in Education 2026 (Department for Education)
- Working Together to Safeguard Children – updated 2026 (HM Government)
- Information Sharing to Safeguard Children and Young People (Department for Education)
- The Children Act 1989
- The Children Act 2004
- The Care Act 2014
- The Education Act 2002 (including section 172)
- Care and Support Statutory Guidance 2023 (Department of Health and Social Care)
- Information Sharing: Guidance for practitioners and managers. HM Government (2018)
- Rehabilitation of Offenders Act 1974
- Disqualification under the Childcare Act 2006 - Update 2018 (Department for Education)

- Counter Terrorism and Security Act 2015 (including the 'Prevent Duty')
- The Prevent Duty, Departmental, Advice for Schools and Child Care Providers 2015 (Department for Education)
- Modern Slavery Act 2015
- Human Rights Act 1998
- Local Safeguarding Partners/Arrangements/Local Safeguarding Adult Board
- Guidance for safer working practice for those working with Children and Young people in Education settings 2022 (Safer Recruitment Consortium)
- Domestic Abuse Act 2021
- Mental Capacity Act 2005
- Non-School Alternative Provision: Voluntary National Standards 2025

This policy should be read in conjunction with our other relevant safeguarding policies - including but not limited to:

- Allegations and Misconduct Policy
- Complaints Policy
- Missing Policy
- Online Safety Policy
- Personal Device Policy
- Safer Recruitment Policy
- Temporary Worker Code of Conduct
- Whistleblowing Policy

Recruitment and Selection Process

Prospero Group is also committed to protecting Children and Adults at Risk through a careful recruitment and selection process (Safer Recruitment Policy), a Whistleblowing Policy and guidance on appropriate behaviour (Temporary Worker Code of Conduct). These policies should be read alongside this policy.

Prospero Group's rigorous procedures, following ASPCo's Compliance + process ensures that any Temporary Worker found to have a history of unacceptable conduct or practice, will not be placed.

Designated Safeguarding Lead/Officers (DSL/DSO)

The role of Prospero Group's DSL/DSO includes:

- Ensuring that all relevant Internal Employees and Temporary Workers have received at induction safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) appropriate to their role and continue receiving training to enable the development of skills and good practice when working with Children/Adults at Risk.
- Receiving and responding appropriately to all reports of safeguarding issues or abuse which are raised by Internal Employees, partner agencies, Temporary Workers or any other third party.
- Ensuring that confidential, detailed and accurate records are kept of any concerns, reports or referrals related to Temporary Workers or Children/Adults at Risk that they work with.
- Liaising with Designated Safeguarding Leads/Officers in partner organisations.
- Acting as a source of support, advice and expertise for Internal Employees and Temporary Workers with concerns and liaising with other agencies and professionals.

- Supporting Internal Employees and Temporary Workers involved in safeguarding incidents and assisting them in challenging or reporting poor or unsafe practice.
- Referring any allegations of abuse or safeguarding concerns to the relevant children or adult social care and if relevant, the police and/or the Local Authority's Designated Officer (LADO). In order to do this, the DSL/DSO will need to consult the Local Safeguarding Partnership Arrangements/Local Safeguarding Adult Board for the area in which the organisation is located. Further details on referral routes are located in Working Together to Safeguard Children (updated 2026), Care and Support Statutory Guidance 2022, and in Keeping Children Safe in Education (2026).
- Reporting concerns to the Disclosure and Barring Service (DBS), this may be where an Internal Employee or Temporary Worker has been dismissed or left, where serious concerns have been raised about their conduct or behaviour, and Prospero Group believes they pose a risk to Children/Adults at Risk. The DSL/DSO will complete the necessary referral documents to the DBS and liaise with them thereafter if they have any further questions regarding the Internal Employee and Temporary Worker.
- Keeping senior management appraised of any safeguarding incidents and their outcome.
- Liaising with Prospero Group's Head of Compliance & Safeguarding and senior management regarding training and skill development programmes available to Internal Employees and Temporary Workers.
- Policy development (or overseeing this, including ensuring that all policies are updated as and when needed, but in any event on an annual basis.

Prospero Group's Designated Safeguarding Lead and Deputy

- Designated Safeguarding Lead: Danni Sleet, Head of Compliance & Safeguarding
- Deputy Designated Safeguarding Lead: Hayley Holman, Assistant Head of Compliance & Safeguarding

To contact our DSL or DDSL, please click here to report a safeguarding concern or incident.

Click here to view a full list of Prospero Teaching's Designated Safeguarding Officers
Click here to view a full list of Prospero Health & Social Care's Designated Safeguarding Officers

Reporting Safeguarding & Professional Conduct Concerns

All Clients, Internal Employees and Temporary Workers must report concerns to the appropriate individual/body.

Concern	Who Do I Refer To?
Professional conduct concerns about Temporary Workers	Use our Safeguarding or Incident Referral Form – which will then be reviewed and actioned by the DSL/DSOs named in the link above
Concerns or allegations about Temporary Workers that do not meet the harm threshold – referred to as 'low-level concerns'	Use our Safeguarding or Incident Referral Form – which will then be reviewed and actioned by the DSL/DSOs named in the link above
Concerns or allegations about Temporary Workers that may meet the harm threshold	Local Authority's Designated Officer (LADO), including Prospero Group DSL/DSO in referral (see above contact details)
Concerns about a Child or Adult at Risk	Prospero - use our Safeguarding or Incident Referral Form – which will then be reviewed and actioned by the DSL/DSOs named in the link below Click here to view a full list of Prospero Teaching's Designated Safeguarding Officers Click here to view a full list of Prospero Health & Social Care's Designated Safeguarding Officers AND

	The Client's Designated Safeguarding Lead / Officer or other appropriate professional, as required by Client's policies and procedures In the absence of the Client's Designated Safeguarding Lead or other appropriate professional, contact local Council's Children's Social Services department (contact details on each Council's website). If you do not know which Council to report to, you can check this via the Government website.
Disclosure made by a Child or Adult at Risk	**Remain calm**: Stay composed and avoid reacting with shock or disbelief. **Listen actively**: Give the individual your full attention and allow them to speak freely. **Avoid leading questions**: Ask open-ended questions and avoid probing for details. **Record accurately**: Document the disclosure as soon as possible, noting the individual's exact words. **Maintain confidentiality**: Keep the information confidential, sharing only with those who need to know (see below). **Don't promise to keep secrets**: Be honest that you may need to share the information with others for their safety. Act promptly by reporting to: The Client's Designated Safeguarding Lead / Officer or other appropriate professional, as required by Client's policies and procedures In the absence of the Client's Designated Safeguarding Lead or other appropriate professional, contact local Council's Children's Social Services department (contact details on each Council's website). If you do not know which Council to report to, you can check this via the Government website AND Prospero - use our Safeguarding or Incident Reporting Form – which will then be reviewed and actioned by the DSL/DSOs named in the link below Click here to view a list of Prospero Teaching's Designated Safeguarding Officers Click here to view a list of Prospero Health & Social Care's Designated Safeguarding Officers
Immediate risk of harm to Child or Adult at Risk	Local police by dialling 999 (emergency only)

Responding to Safeguarding Concerns

All Internal Employees have a responsibility to protect Children/Adults at Risk. This includes:

- Observing Prospero Group policies and processes.
- Attending the recommended training and keeping their skills and knowledge concerning safeguarding and safer recruitment up to date.

- Reporting any concerns arising from meeting Temporary Worker's or carrying out pre-placement checks to the DSL/DSO without delay and making a clear written record of all relevant information to be passed to the DSL/DSO.
- Reporting any concerns arising from organisation visits / placements to the DSL/DSO at the relevant organisation and confirming that this has been done to Prospero Group's DSL/DSO.
- Taking action, such as following the process detailed in the Whistleblowing Policy where there are concerns about practice.
- Ensuring Temporary Workers are aware of the process for reporting concerns to Children's Social Care (MASH).

All Temporary Workers working through Prospero Group are expected to keep Children and Adults at Risk safe by:

- Following Prospero Group's policies and Temporary Worker Code of Conduct.
- Following the Safeguarding Policy of each placement, including any Code of Conduct.
- Making the DSL/DSO at the placement aware of any concerns regarding any Children/Adults at Risk; or any adults caring for or working with those persons.
- Seeking advice and support from Prospero Group's DSL/DSO when they have reason to believe that their concerns have not been responded to appropriately or they have concerns about practice in the placement.
- Acting promptly to complete and submit a MASH/MARF report, when directed by the nominated DSL/DSO, in accordance with Local Authority's procedures.

Internal Employees and Temporary Workers must not notify parents, carers or family members of a safeguarding concern where doing so could place an individual at further risk of harm or compromise a safeguarding investigation. Any decision to inform parents or carers should be made in accordance with the organisation's safeguarding procedures and under the direction of the DSL/DSO or relevant safeguarding authorities.

Dealing with Allegations of Abuse Made Against Temporary Workers

All Temporary Workers placed on assignment are responsible for supporting safe behaviour and have responsibility to follow the guidance laid out in this policy and related policies, such as the Code of Conduct.

In accordance with the Care Act (2014), Working Together to Safeguard Children (updated 2026) and Keeping Children Safe in Education (2026), where an organisation has received an allegation that a volunteer, supply staff or member of staff who works with Children/Adults at Risk has:

- behaved in a way that has harmed a Child/Adult at Risk, or may have harmed a Child/Adult at Risk;
- possibly committed a criminal offence against or related to a Child/Adult at Risk;
- behaved towards a Child/Adult in a way that indicates he or she may pose a risk of harm to Children/Adults at Risk; or
- or behaved or may have behaved in a way that indicates they may not be suitable to work with Children/Adults at Risk.

A referral should be sent to the LADO within one working day, giving as much detail as possible.

Details regarding allegations that meet the harms threshold and concerns that do not meet the allegations threshold (referred to as 'low level concerns'), including who will take responsibility for this once a Temporary Worker is placed, are set out in Prospero Group's Allegations & Misconduct Policy, which should be read alongside this policy.

Child-on-Child Abuse

Child-on-child abuse occurs when a child or young person is harmed, threatened, or exploited by another child or young person. Such behaviour is never acceptable, should never be dismissed as "banter" or "part of growing up," and will always be taken seriously. All concerns of child-on-child abuse must be recognised, reported, and addressed in line with safeguarding procedures to ensure the safety and wellbeing of all children involved.

For more information, please refer to Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (updated 2026), statutory guidance.

Child-on-Child Abuse can take many forms, including, but not limited to:

- Bullying (including cyberbullying)
- Physical abuse
- Sexual violence
- Sexual harassment
- Up-skirting*
- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type violence and/or rituals

Signs of Child-on-Child Abuse

- Absence from school or lack of interest in school activities
- Physical injuries
- Mental or emotional ill-health
- Becoming withdrawn
- Poor self-esteem
- Tiredness
- Alcohol or other substance misuse
- Changes in behaviour
- Inappropriate behaviour for their age
- Displaying harmful behaviour towards others

****Up-skirting***

Upskirting is a form of abusive, invasive and harmful behaviour where someone takes a photograph, video or image under another person's clothing without their knowledge or consent, with the intention of viewing their genitals, buttocks or underwear, or to cause humiliation, distress or sexual gratification. Upskirting is a criminal offence under the Voyeurism (Offences) Act 2019 and may also constitute sexual harassment, sexual abuse, online abuse and peer-on-peer abuse.

Upskirting can happen in person or through the use of mobile phones, hidden cameras or other recording devices. Images may also be shared online or through social media without consent.

Reporting

If a child discloses any form of abuse, this must be reported to the DSL / DSO at the setting in which you are working. If they are unavailable, the concern should be referred to Prospero Group's DSL / DSO.

Always trust your instincts - if you have any concerns, it is important to speak up. Child-on-child abuse may also be a sign of wider safeguarding issues, including potential abuse within the child's home.

If you are unsure about how to report or need advice, you should speak to Prospero Group's DSL / DSO.

Violence Against Women and Girls (VAWG) and Misogyny

Violence Against Women and Girls (VAWG) refers to acts of violence, abuse, harassment and harmful behaviours that disproportionately affect women and girls. Misogyny, including sexist attitudes, language and behaviours, can contribute to an environment where abuse, sexual harassment and sexual violence are normalised or tolerated. Children and young people may be exposed to these harmful attitudes both online and offline.

Prospero Group recognises that addressing harmful attitudes and behaviours at an early stage is an important part of safeguarding. Internal Employees and Temporary Workers should remain vigilant to indicators of misogyny, sexist language, harassment, intimidation, controlling behaviour, harmful gender stereotypes and other behaviour that may place Children or Adults at Risk of harm.

Any concerns regarding VAWG, misogynistic behaviour, sexual harassment, sexual violence or related safeguarding issues must be taken seriously, challenged appropriately, and reported in line with this policy and the relevant safeguarding procedures. Staff should never dismiss such behaviour as banter, joking or part of growing up.

Exploitation

Exploitation is a form of abuse in which an individual or group takes advantage of a child, young person, or Adult at Risk for their own benefit. Exploitation can occur in many forms, including criminal exploitation, sexual exploitation, financial exploitation, online exploitation, modern slavery, trafficking, forced labour, domestic servitude, and radicalisation. Exploitation may also involve children or adults at risk being compelled, coerced, deceived or manipulated into criminal, sexual or labour activities for the benefit of another person or group.

Exploitation often involves an imbalance of power, where the perpetrator uses coercion, intimidation, manipulation, violence, threats, deception, status, technology, or dependency to control the victim. In many cases, the individual being exploited may not recognise themselves as a victim due to grooming, fear, emotional attachment, intimidation, or perceived loyalty to the exploiter.

Exploitation can occur:

- In person or online.
- Within families, peer groups, intimate relationships, organised groups, or communities.
- Across all ages, genders, ethnicities, cultures, and socioeconomic backgrounds.
- Over a short or prolonged period of time.

Children and Adults at Risk who experience social isolation, poverty, homelessness, mental health concerns, substance misuse, domestic abuse, previous trauma, disability, learning difficulties, or a lack of protective support networks may be at increased risk of exploitation.

Possible indicators of exploitation may include:

- Sudden changes in behaviour, mood, presentation, or relationships.
- Going missing from home, care, work, or education.
- Unexplained money, gifts, clothing, phones, or possessions.
- Increased secrecy, withdrawal, fearfulness, or anxiety.
- Association with older individuals or unknown adults.
- Excessive online activity or concerning online interactions.
- Signs of coercion, control, intimidation, or fear.
- Poor attendance at school, work, or placements.
- Substance misuse, self-harm, or unexplained injuries.

These signs do not necessarily mean exploitation is taking place; however, all concerns must be taken seriously and responded to appropriately.

All Internal Employees and Temporary Workers must remain vigilant to the signs of exploitation and report concerns immediately in line with this policy and local safeguarding procedures. Concerns should always be shared with the appropriate DSL/DSO and, where necessary, external safeguarding agencies and/or the police.

Further detailed guidance on specific forms of exploitation is included within:

- Child Criminal Exploitation
- Child Sexual Exploitation
- Criminal Exploitation / County Lines
- Modern Slavery
- Online Safety
- Preventing Radicalisation

Child Criminal Exploitation

Child Criminal exploitation refers to the manipulation or coercion of individuals, often vulnerable people such as children, young people, or those in precarious situations, into engaging in criminal activities. This exploitation typically involves an imbalance of power, where the exploiter uses threats, violence, or deception to control and exploit the victim for financial or personal gain.

A common form of criminal exploitation is "county lines," where gangs or organised crime groups exploit children and young people to transport and sell drugs across different regions. Victims may also be forced into theft, burglary, or other illegal activities. Criminal exploitation can have severe psychological, emotional, and physical impacts on the victims, who may feel trapped and unable to escape the situation due to fear or lack of support.

For more information, please refer to Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (updated 2026), statutory guidance.

Child Criminal Exploitation may constitute modern slavery and human trafficking. In accordance with Modern Slavery statutory guidance, where a child is identified as a potential victim of Child Criminal Exploitation, consideration should be given to completing both a safeguarding referral and an appropriate modern slavery referral.

Signs of Child Criminal Exploitation

Signs of criminal exploitation in children and young people include:

- **Behaviour**: Sudden changes in mood, appearance, or behaviour, or avoiding certain people, places, or situations. They may also be reluctant to participate in activities they once enjoyed, or have emotional outbursts or extreme mood swings.
- **School**: Frequent absences from school, or doing badly in school.
- **Home**: Going missing from home, staying out late, or traveling for unexplained reasons.
- **Relationships**: Being in a relationship or hanging out with someone older than them.
- **Isolation**: Being isolated or withdrawn from family and friends.
- **Gifts**: Receiving gifts from unknown sources.
- **Substance use**: Signs they are under the influence of alcohol or drugs.
- **Self-harm**: Self-harming.
- **Theft**: Committing theft or shoplifting.
- **Injuries**: Physical injuries.
- **Money**: Unexplained acquisition of money, clothes, jewellery, or mobile phones.
- **Phone calls**: Excessive receipt of texts or phone calls.

Reporting

If you suspect that a child is being criminally exploited, it is crucial to act quickly to ensure the child's safety.

1. Contact the Police

- **Emergency**: If a child is in immediate danger, call 999 right away.
- **Non-Emergency**: If the child is not in immediate danger, you can call the non-emergency police number, 101, to report your concerns.

2. Contact Local Authorities

- Children's Social Services: Report your concerns to your local Council's Children's Social Services department (you can find contact details on each Council's website). If you do not know which Council to report to, you can check this via the Government website. Once reported, Social Services will assess the situation and take the necessary steps to protect the child.

3. Report to NSPCC

- NSPCC Helpline: The National Society for the Prevention of Cruelty to Children (NSPCC) offers a 24/7 helpline where you can report concerns anonymously. Call 0808 800 5000 or email help@nspcc.org.uk.
- Online Reporting: You can also report concerns via the NSPCC website.

4. Contact CEOP (Child Exploitation and Online Protection)

- CEOP: If you suspect online grooming related to criminal exploitation, you can report it directly to CEOP through their online reporting tool at www.ceop.police.uk/safety-centre.

5. School or Childcare Providers

- Designated Safeguarding Lead (DSL): If you are reporting concerns about a child within a school or childcare setting, contact the DSL in that institution. They are responsible for handling safeguarding concerns and will take appropriate action.

If you are unsure about how to report or need advice, you should speak to Prospero Group's DSL / DSO.

Children Missing Education

Children Missing Education refers to children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at school. A child missing education is a potential indicator of abuse, neglect, exploitation, radicalisation, child criminal exploitation, child sexual exploitation, mental health concerns, forced marriage, FGM or child-on-child abuse. Where a child has been absent from education for 10 consecutive days or more without appropriate explanation, the Local Authority should be notified in line with statutory requirements.

Children may be considered missing education where they:

- are in the process of applying for a school place;
- have been offered a school place but have not yet started;
- are receiving Elective Home Education (EHE) that has been deemed unsuitable;
- have a pattern of persistent absence or poor attendance;
- have been removed from roll without appropriate checks being completed;
- have disengaged from education;
- or where their whereabouts are unclear or unknown.

For more information, please refer to Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (updated 2026), statutory guidance.

Signs of Children Missing Education

Signs that a child may be at risk of becoming missing from education include:

- Frequent or prolonged absences from school, tuition or education provision;
- Repeated lateness or patterns of non-attendance;
- Sudden disengagement from education or learning activities;
- Failure to start at a new school placement;
- Home circumstances changing unexpectedly;
- Reduced contact with professionals or support services;
- Unknown whereabouts or inability to make contact with the child or family;
- Social isolation or withdrawal;
- Increased safeguarding concerns, including neglect, exploitation or abuse;
- Parents/carers declining support or avoiding professional engagement.

First Day Calling Procedures

Settings should have effective first day calling and attendance procedures in place to identify unexplained absences promptly and ensure appropriate welfare checks are undertaken.

Unexplained absence may be an indicator of abuse, neglect, exploitation, mental health concerns, child criminal exploitation, child sexual exploitation, radicalisation or other safeguarding risks. Prompt action should therefore be taken where a child is absent without explanation.

Temporary Workers and Internal Employees must:

- follow the attendance and first day calling procedures of the placement setting;
- report unexplained absences or attendance concerns immediately to the Client's DSL/DSO (where applicable) and Prospero Group's DSL/DSO;
- remain professionally curious where contact cannot be established with the child or parent/carer;
- accurately record concerns, attempted contacts and information shared;
- escalate concerns promptly where absences persist or safeguarding risks are identified.

Where a child cannot be located, contact cannot be made with the parent/carer, or there are concerns regarding the child's immediate safety or welfare, Children's Social Care and/or the police should be contacted without delay.

Reporting

If there are concerns that a child is missing education, or at risk of becoming missing education, it is essential that action is taken quickly to safeguard the child's welfare. Where a child has been absent from education for 10 consecutive days or more without appropriate explanation, the Local Authority should be notified in line with statutory requirements.

1. Contact the Police

- **Emergency**: If a child is in immediate danger or their whereabouts are unknown, call 999 right away.

2. Contact Local Authorities

- Children's Social Services: Report your concerns to your local Council's Children's Social Services department (you can find contact details on each Council's website). If you do not know which Council to report to, you can check this via the Government website. Once reported, Social Services will assess the situation and take the necessary steps to protect the child.

3. School or Childcare Providers

- Designated Safeguarding Lead (DSL): If you are reporting concerns about a child within a school or childcare setting, contact the DSL in that institution. They are responsible for handling safeguarding concerns and will take appropriate action.

If you are unsure about how to report or need advice, you should speak to Prospero Group's DSL / DSO.

Medical Conditions

Prospero Group recognises that Children and Adults at Risk with medical conditions, disabilities or allergies may require additional support to remain safe and access education, care and other services.

The fact that an incident occurs relating to the management of a medical condition, disability or allergy would not automatically require a safeguarding referral.

However, a safeguarding concern may arise where an incident indicates that a Child or Adult at Risk may be experiencing neglect, abuse or exploitation, or may be placed at increased risk because of their medical condition. Examples may include:

- Relevant medical information not being shared with those responsible for the individual's care or support.
- Repeated failure to provide essential medication, equipment or treatment.
- Failure to seek appropriate medical attention.
- Deliberate withholding of medication or treatment.
- Placing an individual at avoidable risk due to their medical needs not being met.

Where concerns indicate possible abuse, neglect or exploitation, safeguarding procedures must be followed and the matter reported to the appropriate DSL/DSO without delay.

Child Sexual Exploitation

Child Sexual Exploitation is a form of child abuse where an individual or group takes advantage of a child or young person for sexual purposes in exchange for something the child needs or wants, such as affection, money, drugs, or social status. The exploiters manipulate or coerce the child into engaging in sexual activities, often using violence, threats, or emotional manipulation to maintain control over the victim.

Child Sexual Exploitation can occur both online and offline and may involve physical contact or non-contact activities, such as the sharing of explicit images or videos. It is characterised by an imbalance of power, with the perpetrator holding power over the child due to age, status, or access to resources. Victims may be groomed over time, making it difficult for them to recognise the abuse or feel able to seek help.

Child Sexual Exploitation can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to sexual activity.

CSE can be perpetrated by individuals or organised groups and networks. Most sexual abuse is committed by someone known to the child.

Some children do not recognise that they are being exploited and may believe they are in a genuine romantic or consensual relationship.

As with Child Criminal Exploitation, victims of CSE may not always be recognised as victims and may be criminalised for behaviours they were coerced into undertaking. Professionals should remain vigilant to indicators of exploitation and maintain professional curiosity where concerns arise.

The effects of Child Sexual Exploitation can be devastating, leading to long-term psychological trauma, physical harm, and social isolation. Protecting children from sexual exploitation requires vigilance, education, and a strong safeguarding framework that includes recognising the signs of Child Sexual Exploitation and providing appropriate support to those at risk.

For more information, please refer to Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (updated 2026), statutory guidance.

Legal Framework

This policy is guided by the following UK legislation and standards:

- Children Act 1989 and 2004
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Children and Social Work Act 2017
- Working Together to Safeguard Children (updated 2026)
- Keeping Children Safe in Education (2026)
- Care Standards Act 2000
- The Care Act 2014
- Modern Slavery Act 2015

Factors Which Increase Risk

CSE is a complex issue with various risk factors that can increase a child's vulnerability to being exploited. These risk factors can be both individual and environmental. Risks include:

- **Age** - Children and young people under 18 are at the greatest risk of sexual exploitation. Adolescence, particularly between the ages of 12 and 17, is a critical period when children may be more vulnerable to grooming and manipulation.
- **Disabilities or Special Educational Needs** - Cognitive or developmental disabilities may impair judgment and increase susceptibility to grooming and manipulation.
- **History of Abuse** - Children who have experienced physical, sexual, or emotional abuse in the past are at a significantly higher risk of being exploited. This includes children who have been victims of neglect or domestic violence.
- **Living in Care or Foster Care** - Children who are in care or living in foster homes are often at higher risk of sexual exploitation. They may feel isolated, rejected, or unsupported, making them more susceptible to the attention of exploiters who prey on vulnerabilities.
- **Family Dysfunction** - Dysfunctional family environments, such as those with domestic violence, substance abuse, mental health concerns, or parental neglect, increase a child's risk. A lack of parental supervision or support can make children more susceptible to outside influence and exploitation.
- **Social Isolation and Lack of Support Networks** - Children who are socially isolated, lack a strong family or community support network, or have few friends are more vulnerable to exploitation. Exploiters often target children who lack emotional connections and offer a false sense of belonging or love.
- **Running Away or Being Homeless** - Children who run away from home or who are homeless are at increased risk of sexual exploitation. Being on the streets exposes them to various forms of exploitation, including grooming, trafficking, and sexual abuse.

- **Substance Misuse** - Children who misuse alcohol or drugs are at higher risk of exploitation, as substance use can impair judgment and make them more vulnerable to being coerced or manipulated.
- **Mental Health Concerns** - Children experiencing mental health concerns, such as depression, anxiety, low self-esteem, or self-harm, may be more vulnerable to exploitation. Exploiters may target children who feel marginalised, unloved, or disconnected.
- **Peer Pressure and Vulnerable Friendships** - Adolescents are often influenced by their peer group. Peer pressure or involvement in risky behaviours, such as associating with older individuals or gangs, can increase a young person's vulnerability to exploitation.
- **Cultural or Religious Factors** - Children from marginalised communities, including those from minority ethnic, immigrant, or refugee backgrounds, may face additional risks due to cultural or language barriers, lack of social support, or a sense of displacement.
- **Online Vulnerabilities** - The increased use of social media and online platforms has created new opportunities for exploiters to groom children. Children who are less experienced or knowledgeable about online safety are particularly at risk from online grooming and sexual exploitation.
- **Previous Experiences with Exploitation** - Children who have been involved in previous exploitative situations (such as being coerced into criminal activities or other forms of exploitation) may be more likely to be targeted again. Previous trauma may also increase the likelihood of further abuse.
- **Economic or Financial Hardship** - Families experiencing poverty or financial hardship may be at higher risk, as children in these situations may be more susceptible to offers of material goods or money from exploiters.
- **Cultural and Gender Norms** - Certain cultural or societal expectations related to gender roles, sexuality, and relationships can contribute to vulnerability, especially in areas where young people face pressure or coercion to engage in sexual behaviours.
- **Lack of Knowledge or Awareness** - Children who lack awareness of the risks of exploitation or who do not have appropriate sexual education are more likely to fall victim to grooming or exploitation, as they may not recognise the signs or understand the dangers.
- **Involvement in Criminal Activity** - Children who are involved in gangs or criminal activities, whether as victims or perpetrators, are at greater risk of being sexually exploited. Exploiters may use threats, violence, or coercion to control these children.
- **Negative Experiences with Authority** - Children who have had negative experiences with authorities, such as the police, social services, or schools, may be less likely to report abuse or exploitation, increasing their vulnerability.

Signs of Child Sexual Exploitation

Signs of sexual exploitation in children and young people include:

- **Physical signs** - Bruises or bleeding in the genital or anal area, or a sudden change in physical appearance.
- **Behavioural signs** - Staying out late, missing school, or being absent from work.
- **Emotional signs** - Poor mental health, self-harm, suicidal thoughts, or expressions of despair.
- **Substance use** - Misuse of drugs or alcohol.
- **Isolation** - Reduced contact with family and friends, or isolation from peers.
- **Secretiveness** - Being secretive about what they are doing online, or having money or things they can't explain.
- **Grooming** - Being isolated and having their relationship with parents, carers, and friends broken down.
- **Sexual behaviour** - Unhealthy or inappropriate sexual behaviour, or being involved in offending.
- **Vulnerability** - Evidence of vulnerability on social networking sites, or being frightened of some people, places, or situations.
- **Sexual health** - Repeat sexually transmitted infections, pregnancies, or terminations.
- **Online bullying** - Evidence of online sexual bullying.
- **Gifts** - Receiving gifts from unknown sources.

Reporting

If you suspect that a child is being sexually exploited, it is crucial to act quickly to ensure the child's safety. Temporary Workers must follow Prospero Group's processes and procedures for recording and reporting all concerns.

Individuals who wish to raise concerns should follow the procedures set by the external body or regulator, and as outlined by the below steps.

1. Contact the Police

- **Emergency**: If a child is in immediate danger, call 999 right away.
- **Non-Emergency**: If the child is not in immediate danger, you can call the non-emergency police number, 101, to report your concerns.

2. Contact Local Authorities

- **Children's Social Services**: Report your concerns to your local Council's Children's Social Services department (you can find contact details on each Council's website). If you do not know which Council to report to, you can check this via the Government website. Once reported, Social Services will assess the situation and take the necessary steps to protect the child.

3. Report to NSPCC

- **NSPCC Helpline**: The National Society for the Prevention of Cruelty to Children (NSPCC) offers a 24/7 helpline where you can report concerns anonymously. Call 0808 800 5000 or email help@nspcc.org.uk.
- **Online Reporting**: You can also report concerns via the NSPCC website.

4. Contact CEOP (Child Exploitation and Online Protection)

- **CEOP**: If you suspect online sexual exploitation or grooming, you can report it directly to CEOP through their online reporting tool at www.ceop.police.uk/safety-centre.

5. School or Childcare Providers

- **Designated Safeguarding Lead (DSL)**: If you are reporting concerns about a child within a school or childcare setting, contact the DSL in that institution. They are responsible for handling safeguarding concerns and will take appropriate action.

If you are unsure about how to report or need advice, you should speak to Prospero Group's DSL / DSO.

Training

Individuals can access CSE training via the Virtual College.

Training records will be kept in line with Prospero Group's Record Retention Policy.

Confidentiality and Information Sharing

The welfare of the child is paramount, therefore information will be shared on a need-to-know basis in line with Data Protection legislation and Prospero Group's Data Protection Policy.

Criminal Exploitation of Children / County Lines

County Lines is applicable to all Temporary Workers and Internal Employees.

Prospero maintain the following expectations in line with NCA Guidance (referenced below).

County Lines is where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs. The 'County Line' is the mobile phone line used to take the orders of drugs. Importing areas (areas where the drugs are taken to) are reporting increased levels of violence and weapons-related crimes as a result of this trend.

A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children and adults - often with mental health or addiction problems - to act as drug runners or move cash so they can stay under the radar of law enforcement.

In some cases the dealers will take over a local property, normally belonging to a vulnerable person, and use it to operate their criminal activity from. This is known as cuckooing.

People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business.

As we have seen in child sexual exploitation, children often don't see themselves as victims or realise they have been groomed to get involved in criminality. So it's important that we all play our part to understand county lines and speak out if we have concerns.

Who is Vulnerable to County Lines

Those who are most vulnerable to being exploited through County Lines include:

- **Children and Young People**
    - **Age** - Young people, particularly those between the ages of 12 and 17, are the primary targets of County Lines gangs. Children are often seen as more easily manipulated and less likely to raise suspicion.
    - **Social Isolation** - Children who are socially isolated, lack support networks, or have difficulty forming relationships are particularly vulnerable to the attention of gangs, who may offer a false sense of belonging or family.
    - **Those in Care or Foster Care** - Children in care or those living in foster homes are at a higher risk, often due to feelings of neglect, rejection, or a lack of supervision. These children may be more susceptible to being groomed or exploited by gang members.
    - **Running Away or Homelessness** - Children who run away from home or who are homeless are especially vulnerable. Without stable housing or support, they are more likely to be exploited by criminals who prey on their vulnerability.
    - **School Exclusion** - Those who are excluded from school or have trouble engaging with education may be at higher risk. Gangs often target those who are disengaged from formal systems.
    - **Substance Misuse** - Young people who misuse drugs or alcohol are more susceptible to being targeted by gangs, as they are easier to manipulate or control through substance use.
- **Adults at Risk**
    - **Mental Health Concerns -** Adults with mental health concerns or cognitive impairments can be more easily manipulated by County Lines gangs. They may lack the capacity to recognise manipulation or coercion, making them more vulnerable to exploitation.
    - **Substance Misuse -** Adults with substance misuse concerns can be vulnerable targets for County Lines exploitation, as gangs often exploit addiction to control individuals and involve them in drug-running activities.
    - **Those Experiencing Domestic Abuse -** Adults who are victims of domestic abuse or controlling relationships may be more vulnerable, as they may already be in situations where they are used to manipulation and control, making it easier for them to be coerced into drug-running activities.
    - **Homelessness or Unstable Housing –** Adults at Risk who are homeless or living in unstable conditions are also at risk. The lack of stable housing or financial support increases the likelihood that they will fall prey to gangs offering money, shelter, or protection.
- **Those Facing Economic Hardship**

- **Poverty -** Children and Adults from economically disadvantaged backgrounds are more likely to be targeted by County Lines gangs, as they may be more willing to engage in criminal activities for money, food, or material goods.
- **Family Stress -** Families experiencing financial hardship, unemployment, or high levels of stress may not be able to provide the support that children or adults need, making them more vulnerable to external manipulation or coercion.

- **Cultural or Language Barriers**
  - **Migrants or Refugees -** Vulnerable migrants or refugees, especially those who are new to the country or do not speak English fluently, are at high risk of being exploited by County Lines gangs. These individuals may feel isolated, lack knowledge of local laws, and may be reluctant to report abuse due to fear of authorities or lack of trust.
- **Gang Involvement or Peer Pressure**
  - **Peer Pressure -** Young people who are involved with peers who are already associated with gangs are at high risk. Gangs often recruit children or young people from other gangs to help extend their operations, using peer pressure and loyalty to coerce them into drug running.
  - **Previous Exposure to Crime -** Children or young adults who have been involved in criminal activities, even at a low level, may be more susceptible to County Lines exploitation. Exploiters often target these individuals, knowing they are more likely to comply with criminal behaviour.
- **Those Who Have Experienced Trauma or Abuse**
  - **Victims of Sexual or Physical Abuse -** Children and adults who have suffered abuse or trauma may be more vulnerable to County Lines exploitation. The trauma they have experienced can make them more susceptible to manipulation by criminals offering them a way out of their situation or providing false promises of care and protection.
- **Individuals Lacking Trust in Authorities**
  - **Distrust of Police or Social Services -** Those who have had negative experiences with authorities, such as the police or social services, may be reluctant to report their involvement with County Lines gangs. This fear or distrust increases their vulnerability, as they are less likely to seek help or escape from the situation.

Signs of County Lines

Some signs to look out for include:

- An increase in visitors and cars to a house or flat
- New faces appearing at the house or flat
- New and regularly changing residents (e.g different accents compared to local accent
- Change in resident's mood and/or demeanour (e.g. secretive/ withdrawn/ aggressive/ emotional)
- Substance misuse and/or drug paraphernalia
- Changes in the way young people you might know dress
- Unexplained, sometimes unaffordable new things (e.g clothes, jewellery, cars etc)
- Residents or young people you know going missing, maybe for long periods of time
- Young people seen in different cars/taxis driven by unknown adults
- Young people seeming unfamiliar with your community or where they are
- Truancy, exclusion, disengagement from school
- An increase in anti-social behaviour in the community
- Unexplained injuries

Reporting

The best advice is to trust your instincts. Even if someone isn't involved in county lines drug dealing, they may be being exploited in some other way, so it's always worth speaking out.

If you are in any doubt, you should speak to Prospero Group's DSL / DSO, your local police by dialling 101 (in an emergency 999) and/or the independent charity Crimestoppers on 0800 555 111.

Training

Individuals can access free CSE training via the Virtual College.

Training records will be kept in line with Prospero Group's Record Retention Policy.

Confidentiality and Information Sharing

The welfare of the Children and Adults at Risk is paramount, therefore information will be shared on a need-to-know basis in line with Data Protection legislation and Prospero Group's Data Protection Policy.

Serious Violence

Serious violence can have a significant impact on the safety and wellbeing of children, young people and Adults at Risk. It is often linked to criminal exploitation, gangs, County Lines activity, substance misuse, weapon carrying, trauma and adverse childhood experiences.

All Internal Employees and Temporary Workers should be aware that involvement in, exposure to, or fear of serious violence may place an individual at increased risk of harm. Indicators may include:

- Unexplained injuries.
- Increased aggression or violent behaviour.
- Carrying or discussing weapons.
- Association with gangs or individuals involved in criminal activity.
- Going missing from home, care or education.
- Significant changes in behaviour, mood or peer groups.
- Unexplained money, gifts or possessions.
- Substance misuse.

These signs do not necessarily mean serious violence is taking place; however, all concerns must be taken seriously and responded to appropriately.

Any concerns regarding serious violence, gang involvement, weapon carrying or associated exploitation must be reported immediately to the appropriate DSL/DSO in line with safeguarding procedures. Where there is an immediate risk of harm or danger to life, the police should be contacted via 999.

Internal Employees and Temporary Workers must remain vigilant, maintain professional curiosity, accurately record concerns and work collaboratively with safeguarding partners to protect Children and Adults at Risk from serious violence and related harm.

Domestic Abuse

Domestic abuse can impact children directly through harm, or indirectly when they observe violence or abuse between family members. In some cases, children may feel responsible for the abuse, or may have had to leave the family home because of it.

Domestic abuse can include, but is not limited to:

- Intimate partner violence
- Abuse by family members
- Teenage relationship abuse (abuse within intimate personal relationships between children)
- Child/adolescent to parent violence and abuse

Abuse may be physical, sexual, financial, psychological, or emotional. It also includes the ill-treatment of others, and the harm caused to children who witness such ill-treatment.

Anyone can be a victim of domestic abuse, including children and young people. It can affect people regardless of gender, age, ethnicity, socioeconomic background, or sexuality, and can take place both within and outside the family home.

Exposure to domestic abuse can have serious and long-lasting effects on a child's health, wellbeing, and development. Everyone must remain vigilant to the signs of domestic abuse and follow safeguarding procedures, reporting any concerns immediately.

For more information on identifying and responding to domestic abuse to safeguard children, please refer to the Working Together to Safeguard Children, statutory guidance.

FGM

FGM involves cutting or injuring the female genital organs for non-medical reasons. It is a practice that is not condoned by any religion and can leave physical and mental scars on the girl involved. Since 1985, it has been illegal in the UK, but many young girls are sent abroad to have the procedure carried out.

The age at which girls undergo FGM varies enormously according to the community in which they live. The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before marriage or during the first pregnancy. However, many cases of FGM are thought to take place between the ages of 5 to 8 years and therefore girls within that age bracket are at a higher risk.

Reporting

Since October 2015, there is a requirement on doctors, nurses, teachers and other professionals to report known cases of FGM in under-18s, to the police. A known case is where there has been visual identification (this usually applies to healthcare professionals) or direct verbal disclosure.

If a child discloses that they have undergone FGM, you must ring the non-emergency 101 number within 48 hours. It is important to make a note of your actions and record the police reference number as evidence that you have complied with the duty.

The duty does not apply if the person has reason to believe that another person working in that profession has previously made an FGM notification in connection with the same act of mutilation.

If you are in any doubt, you should speak to Prospero Group's DSL / DSO (remember the duty is individual not organisational). Once you have made your report via the 101 number, you have met the duty.

Mental Health

Mental health difficulties can be an indicator that a child or vulnerable adult is experiencing, or has experienced, abuse, neglect, or exploitation.

Prospero Group recognises that some children may require mental health support and that early identification and intervention can help prevent concerns from escalating. All concerns relating to a child's mental health and emotional wellbeing should be taken seriously and considered within the wider safeguarding context.

Potential indicators of mental health concerns in children and young people:

- **Emotional and Psychological Indicators:**
    - Persistent sadness, tearfulness, or frequent mood swings
    - Low self-esteem or feelings of worthlessness
    - Anxiety, panic attacks, or excessive worry
    - Withdrawal from family, friends, or usual activities
    - Irritability, aggression, or frequent anger outbursts
    - Expressions of hopelessness or thoughts of self-harm
- **Behavioural Indicators:**
    - Sudden changes in behaviour or personality
    - Self-harming behaviour (cutting, scratching, burning)
    - Risk-taking behaviours (substance misuse, reckless actions)
    - Difficulty concentrating or frequent daydreaming
    - Obsessive or compulsive behaviours
    - Loss of interest in previously enjoyed activities
- **Social Indicators:**
    - Social withdrawal or isolation from peers
    - Conflict with friends, family, or authority figures
    - Difficulty maintaining friendships or relationships
    - Reluctance to attend school or frequent absences
- **Physical Indicators:**
    - Changes in appetite or significant weight loss/gain
    - Sleep disturbances, nightmares, or difficulty sleeping
    - Frequent physical complaints (headaches, stomach aches) without clear medical cause
    - Fatigue or low energy levels
- **Other Possible Signs**
    - Regression in younger children (bedwetting, clinginess)
    - Decline in academic performance
    - Overly perfectionist or anxious behaviour regarding schoolwork
    - Talking about death or suicide, or expressing a wish to harm themselves

Temporary Workers are expected to:

- Remain alert to behavioural or emotional signs that may indicate a child or vulnerable adult is experiencing, or at risk of developing, a mental health problem.
- Report any concerns promptly to the DSL/DSO.

If you are unsure or need advice, you should contact Prospero Group's DSL/DSO, your local police by dialling 101 (or 999 in an emergency), and/or the independent charity Crimestoppers on 0800 555 111

Online Safety

While technology offers many benefits, it can also contribute to safeguarding and wellbeing concerns. It is essential that children and vulnerable adults are protected from potentially harmful or inappropriate online content and interactions.

Staff should be aware of emerging online risks associated with artificial intelligence (AI), including the creation and sharing of AI-generated content, manipulated images ("deepfakes"), misinformation and online abuse. Any concerns should be managed in accordance with safeguarding and online safety procedures.

Temporary Workers are expected to:

- Follow the Client's online safety policy - if one is not available, adhere to Prospero Group's Online Safety Policy.
- Be aware of the risks associated with technology, including but not limited to laptops, mobile phones, personal devices, and smart devices.
- Monitor for any inappropriate content being accessed and report concerns promptly.

Incel Ideology

"Incels" (involuntary celibates) are individuals, often young men, who identify as unable to form romantic or sexual relationships. In some online communities, this identity has evolved into an extremist ideology characterised by misogyny, hostility toward women, and, in rare cases, advocacy of violence.

Temporary Workers should be alert to indicators that a child or young person may be influenced by incel ideology, including:

- Frequent engagement with online content promoting misogyny or violence.
- Use of terminology associated with incel communities (e.g. "Chad," "Stacy," "blackpill").
- Expressions of entitlement to relationships or disdain toward women.
- Withdrawal from social interactions or increased isolation.
- Sudden changes in mood or behaviour, including anger or depression.

Responding to Concerns

- Report any concerns immediately to the DSL/DSO.
- Record observations in detail, noting dates, times, and context.
- Engage in open, non-confrontational conversations where appropriate.

If concerns persist or there is a risk of radicalisation, the matter should be escalated to the local safeguarding partnership or relevant authorities, and the Prevent Duty/Channel programme may be considered.

For more information, please refer to the Safeguarding Network's guidance - Responding to the incel ideology.

Preventing Radicalisation

Prospero maintain the following expectations in line with the Prevent duty guidance: England and Wales (2023).

Radicalisation is the process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals, often leading to the support of terrorism or violent acts. This process often involves the rejection of mainstream values and may include the adoption of beliefs that justify the use of violence to achieve ideological goals. Radicalisation can occur through various means, including exposure to extremist propaganda, influence from radical groups or individuals, and online platforms that promote extremist content. It is a gradual process that can affect anyone, particularly those who may feel marginalised, isolated, or disillusioned.

Factors Which Increase Risk

Radicalisation is a complex process influenced by a combination of individual, social, and contextual factors. Below are some key factors that may increase the risk of radicalisation:

- **Individual Factors**
    - **Developmental Vulnerabilities (Children)**
        - Delayed cognitive development, making them more impressionable and less able to critically analyse extremist ideologies.
        - Increased need for identity formation, belonging, and validation.
    - **Disabilities or Special Educational Needs (Children and Adults)**
        - Cognitive or developmental disabilities may impair judgment and increase susceptibility to manipulation.
        - Challenges in understanding or resisting extremist narratives.
    - **Emotional or Psychological Challenges**
        - Experiences of trauma, neglect, or abuse, particularly in childhood.
        - Mental health issues such as anxiety, depression, or PTSD.
    - **Desire for Recognition**
        - Vulnerability to extremist groups offering a sense of importance, purpose, or heroism.
    - **Victim of Bullying or Marginalisation**
        - Feelings of powerlessness or exclusion that extremist ideologies may exploit.
- **Social Factors**
    - **Unstable Family Environment**
        - Exposure to domestic violence, substance abuse, or inconsistent parenting.
        - Lack of positive role models or support systems.
    - **Social Isolation**
        - Limited peer interactions or inability to form meaningful relationships.
        - Adults with restricted mobility or isolated living conditions.
    - **Peer Pressure**
        - Children and adolescents are particularly susceptible to the influence of radicalised friends or groups.
        - Adults at Risk may be influenced by caregivers or social groups with extremist ideologies.
    - **Involvement in Gangs or Deviant Groups**
        - Overlap between criminal activities and radicalisation pathways, especially for vulnerable young people.
- **Environmental and Contextual Factors**
    - **Institutional Care Settings (Children and Adults)**
        - Vulnerability to radicalised staff, peers, or visitors.
        - Gaps in safeguarding practices, making these environments potential targets for recruiters.
    - **Lack of Safe Spaces**
        - Limited access to environments where individuals can express grievances or seek support without judgment.
    - **Community Disconnection**
        - Children and adults from minority or migrant backgrounds may feel alienated in their communities.
        - Adults in care homes or similar facilities may lack community integration.
    - **Cultural or Religious Exploitation**
        - Manipulation of cultural or religious beliefs to promote radical ideologies.
    - **Limited Education or Awareness**

        - Children lacking exposure to critical thinking skills.
        - Adults with limited education or literacy may struggle to identify propaganda.
- **Online Influence**
    - **Unsupervised Internet Access (Children)**
        - Exposure to extremist content via gaming platforms, social media, or forums.
        - Predators using online spaces to groom and radicalise children.
    - **Targeted Exploitation (Adults at Risk)**
        - Extremists identifying and manipulating isolated or vulnerable individuals through personalised online interactions.
- **Triggering Events**
    - **Traumatic Life Events**
        - Children experiencing parental separation, bereavement, or foster care placement.
        - Adults experiencing bereavement, loss of independence, or abuse.
    - **Conflict Zones or Migration**
        - Refugee children or adults may carry trauma and be more vulnerable to exploitation.
        - Unaccompanied minors face heightened risks due to lack of support systems.
    - **Perceived Injustice or Marginalisation**
        - Experiences of racism, sexism, or ableism, leading to anger or alienation.

Signs of Radicalisation

Some signs to look out for include:

- **Isolation** - They may isolate themselves from friends and family
- **Online activity** - They may spend more time online, or have uncontrolled access to the internet
- **Extreme content** - They may access extremist content, download propaganda, or share extreme views on social media
- **Appearance** - They may change their appearance or style of dress to align with an extremist group
- **Symbols** - They may use symbols associated with terrorist organisations
- **Violent views** - They may use abusive, aggressive, or extremist views, threats, or language
- **Recruitment** - They may try to recruit others to join an extremist cause
- **Weapons** - They may be fascinated with weapons, chemicals, or explosives
- **Scripted speech** - They may talk as if from a scripted speech
- **Disrespect** - They may have a sudden disrespectful attitude towards others
- **Anger** - They may have increased levels of anger
- **Low self-esteem** - They may have low self-esteem

Reporting

If you suspect that an individual is being radicalised, it is crucial to act quickly to ensure the individual's safety.

Individuals who wish to raise concerns should follow the procedures set by the external body or regulator, and as outlined by the below steps.

1. Contact the Police

- **Emergency**: In the event of immediate danger, call 999 right away.
- **Non-Emergency**: You can call the national police Prevent advice line on 0800 011 3764.

2. Contact Local Authorities

- **Children's Social Services**: Report your concerns to your local Council's Children's Social Services department (you can find contact details on each Council's website). If you do not know which Council to report to, you can check this via the Government website. Once reported, Social Services will assess the situation and take the necessary steps to protect the child.

If you are in any doubt, you should speak to Prospero Group's DSL / DSO.

Training

Individuals can access free Prevent Duty training via the Home Office.

Training records will be kept in line with Prospero Group's Record Retention Policy.

Confidentiality and Information Sharing

The welfare of the Children and Adults at Risk is paramount, therefore information will be shared on a need-to-know basis in line with Data Protection legislation and Prospero Group's Data Protection Policy.

Training

All Temporary Workers and Internal Employees are required to complete mandatory safeguarding training relevant to their role, with refresher training undertaken annually.

Filtering & Monitoring

In accordance with Keeping Children Safe in Education 2026, Prospero Group will provide a safe environment for students to learn and work, including when online. Prospero Group understand that filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material.

As part of this responsibility, Prospero Group will:

- Ensure that all Internal Employees and Temporary Workers understand their role, are appropriately trained (Prospero's introduction to tutoring course), follow policies, processes and procedures and act on reports and concerns.
- Not provide devices for use by pupils and Temporary Workers.
- Hold tuition sessions via a secure, online platform which can only be accessed by a direct login.
- Ensure access to harmful and inappropriate content is blocked, without unreasonably impacting teaching and learning.
- Ensure Temporary Worker resources are from approved sources such as Prospero Group's Tutor Resource Hub.
- Regularly conduct tuition session observations to identify any potentially harmful and inappropriate online material and any safeguarding / professional conduct concerns.
- Require any concerns to be raised via our secure, online platform, which are then reviewed by Prospero Group's DSL / DSO.

Prospero Group's DSL and Head of Children's Education Services are responsible for delivering and maintaining effective filtering and monitoring systems.

Reporting

If there is any doubt about filtering and monitoring and/or access to any potentially harmful and inappropriate online material, please refer to Keeping Children Safe in Education 2026, Department for Education's filtering and monitoring standards and/or contact Prospero Group's DSL / Head of Children's Education Services.

Concerns can also be reported via Prospero Group's secure, online platform.

Duty to Make a Referral to the DBS

Where there is evidence that anyone has harmed, or poses a risk of harm, to a Child/Adult at Risk, there is a legal duty on Prospero Group to report that person to the Disclosure and Barring Service using their guidance available here. The DBS has statutory authority to bar a person from working in regulated activity with Children and/or Adults at Risk in the UK.

A referral to the DBS will also be made if the person resigns prior to an investigation being carried out or reaching its conclusion. If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance.

Prospero Group will not make any compromise/settlement agreement in the case of a person deemed unsuitable to work with Children/Adults at Risk. Any such agreement which contained a condition of not referring the case to the DBS would constitute a criminal offence.

Anyone who is concerned about a Child's or Adult at Risk's welfare or who believe that a Child or Adult at Risk may be at risk of abuse should pass any information to the DBS or other appropriate authority as soon as possible and no longer than 24 hours after the initial concern.

Whistleblowing

Individuals may find it difficult to raise concerns about colleagues, managers, people in placement or concerning how safeguarding concerns are responded to within a setting. Prospero Group has a specific Whistleblowing Policy which encourages individuals to raise concerns and also provides details of outside organisations that individuals can approach for support and advice. Prospero Group aims to have an open and honest culture where safeguarding is responded to effectively, and both Internal Employees and Temporary Workers feel safe, supported and able to voice any concerns that they have in the knowledge that they will be responded to.

Summary

Prospero Group will make this policy available to Clients and Temporary Workers by hosting it on our website and including within our booking confirmations.

Prospero Group will make this policy available to Internal Employees by hosting it on our shared drive, in the policies folder.

All Internal Employees and Temporary Workers must be aware that they have a professional duty to share information with other recruitment firms in order to safeguard Children/Adults at Risk. The public interest in safeguarding Children/Adults at Risk may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by Prospero Group.

Data Protection

Prospero Group is committed to protecting the privacy and confidentiality of personal data. All personal data processed under this policy will be handled in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and Prospero Group's data protection policies and procedures.

Enforcement

This policy will be enforced by Prospero Group's CEO, Managing Director, Operations Directors, Head of Compliance & Safeguarding and Data Protection Officer.

Failure to adhere to this policy may result in appropriate action being taken. For Temporary Workers, this may include the suspension or termination of Work-Finding Services and referral to the Disclosure and Barring Service (DBS) and/or relevant professional body, where applicable. Prospero Group also reserves the right to suspend or terminate its relationship with any Client where safeguarding concerns, breaches of this policy, or actions that place Service Users at risk are identified.

Review

This policy will be reviewed annually and updated as necessary to reflect changes in legislation, government guidance and best practice.