



SEEAWA Safeguarding Children Policy & Procedure

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Southeast & East Asian Women's Association (SEEAWA) • CIO No. 1203182

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Designated Digital Safeguarding Officer (DDSO)	Sarah Reid — Advocacy and Policy Manager
Trustee Safeguarding Champion	Susan Cueva
Approved by Trustees	October 2025
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Review cycle	Annual — Next review Oct 2026 (or sooner if guidance changes)
Scope	All staff, volunteers, trustees, contractors; applies to all activities on/offline, incl. trips

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1. Purpose & Scope

This Policy sets out how SEEAWA safeguards and promotes the welfare of children (anyone under 18) in contact with our services and activities, including online groups and off-site trips. **It applies to all trustees, staff, volunteers, contractors and partners working on our behalf.**

2. Legal & Policy Framework (as of October 2025)

- Children Act 1989 & 2004 (s.17 Child in Need; s.47 Child Protection).
- Working Together to Safeguard Children 2023 (multi-agency arrangements; early help; information-sharing).



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- Keeping Children Safe in Education 2025 (for schools/colleges; we align our cadence and practice where relevant).
- Education Act 2002 s.175/157 (duties on safeguarding in education).
- Safeguarding Vulnerable Groups Act 2006 (DBS regime).
- Domestic Abuse Act 2021; Forced Marriage & FGM legislation; Modern Slavery Act 2015.
- Online Safety Act 2023 (Ofcom codes and duties from 2025 impacting platforms children use).
- UK GDPR & Data Protection Act 2018; Children's Code (Age-Appropriate Design Code); Caldicott principles; ICO guidance.
- Local safeguarding children partnership (LSCP) procedures and LADO processes.

We will monitor updates

- Track DfE/HO/Ofcom and LSCP updates and adjust this Policy, training and notices accordingly.

3. Principles & Approach

- Child-centred: welfare of the child is paramount; hear the child's voice.
- Early help: identify needs early; offer proportionate support; escalate when thresholds are met.
- Proportionality & least-intrusive actions consistent with safety.
- Contextual safeguarding: consider peer groups, online, community and home contexts.
- Partnership: work with LSCP, schools, health, police and community groups.
- Accountability: clear decision-making, recording and review.

4. Definitions & Indicators of Abuse

Abuse can be a single incident or a pattern, in person or online. Key forms include:

- Physical, Emotional, Sexual abuse, and Neglect.
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE), including county lines.
- Harmful sexual behaviour (HSB) between children; upskirting; image-based abuse.
- Domestic abuse (including coercive control) within the family environment.
- Female Genital Mutilation (FGM); Honour-Based Abuse and Forced Marriage.
- Bullying and Cyberbullying; online harms (exposure to illegal/harmful content, grooming).
- Modern slavery and trafficking; children missing education; fabricated or induced illness.

5. Roles & Responsibilities

Trustees — provide governance; approve this Policy; ensure resourcing and oversight; receive regular safeguarding reports.

Designated Safeguarding Lead (Children) — DSL: Sarah Reid

first point of contact for child safeguarding; triage, advice and referrals; maintains incident log; oversees training and annual review.

Managers/Leads — ensure team compliance; risk assessments; contractor adherence; supervision and support.

All staff/volunteers — follow the Policy/code of conduct; complete training; report concerns immediately; keep accurate records.

Contractors/partners — must comply with this Policy (or equivalent standards) via contract or agreement.

6. Safer Recruitment & Vetting

- Role profiles include safeguarding responsibilities and conduct standards.
- Recruitment checks: identity/address; right-to-work; references; qualification checks.
- DBS checks at appropriate level; consider barred-list checks for regulated activity; use the Update Service where applicable.
- Induction completed within 6 months; probation/role review; supervision at least every 8 weeks for staff; regular support for volunteers.
- Clear disciplinary and grievance procedures; DBS referral duty where criteria met.

7. Induction, Training & Supervision

- All staff/regular volunteers complete induction and annual safeguarding refreshers.
- Teams working with schools/under-18s mirror ****KCSIE**** annual cadence and interim updates.
- Specialist modules: online safety; cultural/linguistic mediation; trafficking/NRPF; DASH/MARAC interface.
- Supervision and case audits to support safe decision-making.

8. Safe Practice & Code of Conduct

- Professional boundaries in 1:1 work; avoid isolated spaces; keep door open/visible where possible.
- Touch only when appropriate and consented; record any incidents or concerns.
- Transport: follow risk assessment; consent; two-adult rule where practicable.
- Images/recordings: obtain informed consent; purpose-limited; secure storage; retention rules.
- Social media & messaging: use approved channels; no private accounts with children; keep records where needed.

9. Online Safety & Digital Safeguarding

- Choose platforms with waiting rooms/moderation; recordings OFF by default; use registration and codes of conduct.
- Protect privacy: minimum data collection; screen-names; disable geotags; safe chat settings.
- If services could be accessed by children, apply Children's Code standards (default high privacy; geolocation off; profiling off by default).
- Be aware of Online Safety Act duties on platforms (Ofcom codes from 2025); signpost risks and reporting routes to children/parents.
- DPIAs for high-risk digital activities; approved processors/contracts; UK/EU data residency preferred or appropriate safeguards.

10. Early Help, Thresholds & Information-Sharing

- Early help: offer proportionate support; liaise with schools/health and family where safe.
- If significant harm is suspected or likely: refer to Children's Social Care (s.47). For complex needs: s.17 Child in Need.
- Consent: seek informed consent where safe/appropriate; do not delay if risk is high.
- Share on a ****need-to-know**** basis; record what, why, with whom and outcomes.
- Lawful basis examples: public task/legitimate interests; vital interests for serious harm; safeguarding conditions under DPA 2018 Sch.1.
- Follow Caldicott principles and ****Working Together**** / LSCP information-sharing protocols.

11. Handling Disclosures & Immediate Safety

- Listen, reassure, avoid leading questions; do not promise confidentiality.
- Record facts in the child's own words (date, time, setting, who was present).
- Consider immediate safety measures; in emergency call ****999****.

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- Report to the ****DSL/Deputy DSL immediately****; same-day written record.

12. Reporting, Recording & Referrals

- Use the Concern/Incident Record (Annex E) and inform DSL.
- DSL triage and refers to ****MASH/Children's Social Care**** as required; follow up in writing within 48 hours if asked.
- Escalate if you disagree with inaction; use LSCP escalation policy.
- Preserve evidence; do not investigate.

13. Allegations against Adults who Work with Children (LADO)

If the concern is about a staff member/volunteer/contractor, contact the ****LADO**** via the local authority (usually through MASH). Do ****not**** investigate internally without LADO advice.

- Criteria include: harmed/may have harmed a child; possible criminal offence; behaviour indicating unsuitability.
- Senior manager/DSL to contact LADO the same day; agree interim risk management (supervision, redeployment, suspension).
- Maintain confidentiality; follow communications plan; consider DBS referral duty after outcome.

14. Activities & Trips (Risk Assessments; Ratios; Consent)

- Pre-trip risk assessments (travel, premises, activities, equipment); qualified instructors where needed.
- Ratios appropriate to age/needs; two-adult rule where practicable; gender balance where appropriate.
- Parental consent and emergency contacts; medical needs and medications plan; safeguarding briefing for all adults.
- Incident/near-miss reporting; debrief and updates to risk assessments.

15. Data Protection, Confidentiality & Retention

- Keep records accurate, timely, secure; restricted access to DSL/DDSL/need-to-know.
- Child protection records retained ****until the child's 25th birthday**** (longer if advised by insurer/authority).
- Pause deletion if legal hold/complaint/investigation; keep a destruction log.
- See Data Protection Policy for full principles; apply Children's Code where relevant.

16. Whistleblowing & Complaints

SEEAWA encourages staff/volunteers to raise concerns in good faith about malpractice or safeguarding failures. Use our Whistleblowing and Complaints Policies. External routes: LSCP, LADO, Police, and NSPCC Whistleblowing Helpline 0800 028 0285.

17. Governance & Review

This Policy is prepared by the Operations & Systems Manager and reviewed by DSL (Children). Annual review by the Trustee Safeguarding Champion and approval by the Board, or sooner if guidance changes.

Annex A — Quick Reference: If you're worried about a child today

- Immediate danger? ****Call 999****.
- Tell the ****DSL/Deputy DSL**** now; submit a written record (Annex E) the same day.
- Don't promise confidentiality; explain what will happen next.
- Record facts only, in the child's words; keep evidence; do not investigate.
- DSL triage → ****MASH/Children's Social Care**** referral (s.47/s.17) as appropriate.
- If allegation is about a worker/volunteer → ****LADO**** the same day.
- Follow-up: support the child and family; agree next steps; log outcomes.

Annex B — Types of Abuse, Harm & Risk Indicators (detail)

- Physical — injuries inconsistent with explanation; frequent injuries; fear of adults.
- Emotional — persistent criticism, withdrawal, humiliation; exposure to domestic abuse.
- Sexual — age-inappropriate sexual knowledge/behaviour; STIs; pregnancy; grooming (including online).
- Neglect — poor hygiene, inadequate supervision, non-attendance, failure to thrive.
- CSE — gifts, older partners, going missing, unexplained money; sudden changes in appearance/behaviour.



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- CCE — carrying weapons, unexplained travel, association with older peers, drug debt, missing episodes.
- HSB — sexually harmful behaviour by children towards others; needs specialist assessment/support.
- FGM — risk indicators (holiday to high-prevalence country, older female relatives visiting, talk of ‘special procedure’); mandatory reporting applies to specified professionals.
- HBV/Forced Marriage — restrictions, surveillance, older suitors; contact ****Forced Marriage Unit****.
- Online harms — contact, conduct, content risks; grooming, sextortion, image sharing, live-streaming.
- Modern slavery/trafficking — control by others, work/exploitation indicators, fear of authorities.

Annex C — Referral/Escalation Flow & Key Contacts

Replace placeholders with your local details and review quarterly.

Borough/Area	MASH / Children’s Social Care (phone/email)	Out of Hours (EDT)	LADO email/phone	Police (non-emergency)
Tower Hamlets (VERIFY)	Golden number: 020 7364 5601 / [insert email]	020 7364 4079	[insert LADO]	101

Annex D — Gillick Competence & Information-Sharing Checklist

- Assess Gillick competence: can the child understand, retain, weigh and communicate the decision? Record support offered (interpreter, plain language).



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Gillick competence is the UK test for whether a **child under 16** has enough understanding and intelligence to **make their own informed decision** about a specific matter (originally medical treatment), without needing parental consent.

Key points

- **Under 16s:** Not automatically unable to decide—assess if *this child, about this decision, today* understands enough to choose.
 - **Decision-specific & time-specific:** A child may be competent for one decision (e.g., counselling) but not another (e.g., complex surgery); competence can change over time.
 - **What they must grasp:** the nature/purpose of what's proposed, the **risks/benefits, alternatives, and likely consequences** of saying yes or no—including confidentiality and when you might have to share information for safety.
 - **How you assess:** can they **understand, retain, weigh up, and communicate** a decision in their own words—without coercion?
- Seek consent where appropriate and safe; consider best interests and risk.
 - If sharing without consent to protect from serious harm: document legal basis (vital/public interests; safeguarding condition), what was shared, with whom and why.
 - Follow Caldicott principles: justify; necessary; minimum; need-to-know; responsibilities; lawful; duty to share; transparency.

Annex E — Concern/Incident Record Template

Child's name/DOB: _____ School/GP (if known): _____

Date/time/location of concern: _____

What was seen/said (child's words; factual): _____

Immediate actions taken (safety): _____

Who else is aware? _____

Reported to (DSL/DDSL) & time: _____

Referrals made (MASH/LADO/Police) & time: _____


Your name/role/contact: _____



Annex F — Activities & Trips: Consent & Risk Checklist

- Risk assessment approved; ratios set; qualified leaders/instructors confirmed.
- Parental consent forms collected; medical/medication plan; emergency contacts.
- Transport plan (drivers vetted/insured; pickups/drop-offs; contingency).
- Safeguarding briefing for adults; code of conduct for children; incident reporting.
- Post-trip debrief; near-miss logged; update risk assessments.

Signed by Trustees:

Trustee: 

Trustee: **SUSAN CUEVA**

Date: October 2025