

Safeguarding Policy

2026-27

Purpose

This policy explains how Challenge Partners aims to ensure that everyone in contact with its activities enjoys a safe and secure environment free from harm, abuse, exploitation and neglect.

The purpose of this policy statement is:

- to promote the wellbeing of and to protect from harm, abuse and mistreatment of any kind people who benefit from our work, our staff and volunteers and others we come into contact with
- to provide team members, partner organisations and any parents and carers with whom we have contact, with the overarching principles guiding our approach to safeguarding.

All team members who work with Challenge Partners must abide by this policy and associated procedures.

Definitions

- Line manager or commissioning member of staff: the individual who holds the primary relationship to supervise the team member.
- Team member: anyone engaged or acting on behalf of Challenge Partners supported or directed activities, including employees, volunteers (including Trustees and Facilitators), interns and consultants (including Lead Reviewers).
- Participant: an attendee at a Challenge Partners organised event – this could be a review, school/trust visit, workshop, focus group, Advisory Group or other research activity led by Challenge Partners.
- Partner organisation: a third-party organisation which Challenge Partners is working with or has contact with in a joint initiative, including Hub Leads.

Understanding of Safeguarding

In this policy, safeguarding refers to the range of measures to protect the people who come into contact with Challenge Partners through our work, from harm, abuse, neglect and mistreatment of any kind. It includes a wide range of issues relating to an individual's welfare and their health and safety.

There is a particular duty of care for organisations providing activities for those who may be experiencing, or at risk of, abuse or neglect. This includes:

- children and young people under 18 years of age. We will seek to protect children from maltreatment; prevent impairment of their health or development; ensure they are growing up in circumstances consistent with the provision of safe and effective care and take action to enable them to have the best outcomes.

CHALLENGE PARTNERS

- adults at risk. We will protect the rights of adults (aged 18 and over) to live in safety, free from abuse and neglect. We will seek to ensure appropriate provision for those who face barriers to equal participation in society.

Legal Framework

We recognise and seek to meet all duties expected by our principal regulator, the Charity Commission, [for safeguarding and protecting people](#) and [protecting charities from abuse for extremist purposes](#).

In developing this policy and any associated procedures and guidance, Challenge Partners has referred to key domestic legislation, including [The Charities Acts 2006 & 2011](#), the [Children Act 1989 & 2004](#), the [Protection of Children Act 1999](#) and the [Safeguarding Vulnerable Groups Act 2006](#), the [Care Act 2014](#) and [the Data Protection Act 2018](#) and in light of the principles of the [Mental Capacity Act 2005](#) and the [Counter-Terrorism and Security Act 2015](#).

Challenge Partners recognises its particular duties to safeguard and protect the rights of children and adults at risk of harm affected by its work. Where we engage in such work, we will consider relevant statutory guidance, including [Keeping Children Safe in Education \(2026\)](#), [Working Together to Safeguard Children \(2026\)](#), [Care and support statutory guidance \(2022\)](#) and [Prevent Duty Guidance for England & Wales \(2023\)](#). We shall consider this guidance proportionally in light of our structure and with respect to statutory agencies' duties to protect children and adults experiencing or at risk of harm.

We also acknowledge the growing intersection between technology and safeguarding, taking account of guidance from the Charity Commission, the Information Commissioner's Office (ICO), and the National Cyber Security Centre (NCSC) regarding artificial intelligence (AI), deepfakes, and online harm.

Policy Statement

Protecting people and meeting our safeguarding responsibilities is a governance priority for Challenge Partners. It is a fundamental part of operating as a charity for the public benefit and a foundation for reducing educational inequality and improving all children's life chances.

We are committed to ensuring that every person who works for or comes into contact with us should be treated with dignity and respect and feel that they are in a safe and supportive environment. Our work is primarily impacting children and we respect the absolute right of every child to a childhood free from abuse, neglect or exploitation.

To achieve this, all of our team members are responsible for safeguarding others' health and wellbeing and protecting them from all forms of harm. All those involved in our work should show a commitment to and an understanding of others' rights, safety, and welfare. Failure to do so would be considered a breach of this policy.

We understand that society's inequalities mean that not all groups are treated equally, fairly and with dignity or have the same protection from abuse or harm. We are responsible for safeguarding groups most at risk of harm in our work, such as children, and removing the barriers that exclude marginalised groups from equal protection.

CHALLENGE PARTNERS

We recognise that abuse and neglect can occur among peers, from our team members, within the community and/or within individuals' families and intimate relationships. We will always act, no matter the circumstances of the concern of abuse or neglect.

We recognise our duties to ensure that our assets, people, beneficiaries, and reputation are not exposed to risks from becoming drawn into or involved in extremism. We will prevent the promotion of extremist ideas that may encourage terrorism, or that incite criminal acts or hatred or that breach equality and non-discrimination laws.

Our approach to safeguarding is grounded in our values which underpin everything we do:

Excellence: We recognise that protecting people from harm is both a corporate and individual responsibility. Where there is a safeguarding concern, our primary consideration is always the best interests of those at risk of or experiencing harm. To do so, we will ensure that the individual's views, wishes, and feelings are taken into account.

Equity: No one should ever experience abuse of any kind through our activities. Everyone has an equal right to be protected from all types of harm or abuse regardless of their age, sex, gender, disability, race, religion or belief, sexual orientation, socio-economic status, culture, language, personality, or lifestyle.

Collaboration: Challenge Partners recognises that working in partnership with other agencies is essential in effective safeguarding. When there are concerns of abuse or maltreatment, our role is not to investigate but to recognise and refer. We will support statutory agencies in investigation and assessment processes and proactively support police or prosecutors to fulfil their duties.

Challenge: We aim to be open about how we demonstrate the highest level of institutional integrity and personal conduct at all times. We will ensure that our team members act and respond appropriately to any concerns or allegations of abuse, harm, or neglect. We will be open as to how we have learnt from our experience and value challenge which helps us improve.

Courageous leadership: We seek to build a culture and space where we are accountable to our network and our team for our action on safeguarding.

Policy Implementation

Challenge Partners seeks to build a culture of safeguarding for all in our organisation by:

Appointing relevant roles, including a Designated Safeguarding Lead (DSL)

- We will appoint a Lead Trustee to provide strategic leadership for safeguarding, support the Board to meet its responsibilities and support the DSL to fulfil their duties and oversee concerns. The Board of Trustees will maintain oversight of safeguarding risks as part of its strategic risk management and receive an Annual Report outlining major safeguarding risks and how they are controlled.
- We will appoint a DSL to champion and lead implementation of safeguarding in our activities. The DSL will be trained and have the time and focus to fulfil their duties effectively. The details of the DSL's responsibilities are set out in Annex B.

CHALLENGE PARTNERS

Ensuring responsibility in our collaboration

- Collaboration is core to our work. All our partnerships must be with organisations that share our commitment to safeguarding. We will always challenge partners where we have concerns about their approach to safeguarding.
- In any joint activities or initiatives with others, Challenge Partners and the partner organisation will agree and record in writing who has responsibility for safeguarding (i.e., the "safeguarding lead organisation") and which policies and procedures will be followed for the joint initiative.
- We will be mindful of our safeguarding responsibilities when undertaking proportionate due diligence of suppliers and consultants, recommending other organisations to participants, and hosting guest speakers.

Ensuring safer recruitment practices

- We will recruit team members safely, ensuring all necessary checks are made; including deciding whether to seek a DBS check for the role and managing risks to ensure they are suitable for their role.
- We have determined that:
 - Consultants must hold a valid enhanced DBS check (child workforce) issued within the last 3 years. This must be:
 - Reviewed by a member of Challenge Partners' staff
 - Checked on the Update Service where possible, and
 - Recorded with the disclosure number and date of issue.
 - If a consultant does not have a suitable check, there must be an agreement with Challenge Partners to arrange for a new enhanced DBS check processed.
 - Volunteers who are serving school/trust leaders must confirm they hold a valid enhanced DBS check (child workforce) in line with their school/trust's safeguarding policy. They must:
 - Take their DBS check with them when attending school visits.
 - Trustees must have an at least basic DBS check.
- We will advise all team members working with children and adults at risk of harm to disclose any reason that may affect their suitability to undertake this work (including convictions, cautions, court orders, reprimands, and warnings).

Supporting team members to fulfil their responsibilities

- Challenge Partners will share information about the right to be safe and safeguarding best practice, as appropriate, to all engaged in our work, including through induction and training.

CHALLENGE PARTNERS

- Any new team member will, as a minimum, be provided with this policy and have an induction with the DSL. The DSL has a role to ensure that team members are competent, confident and safe to fulfil their responsibilities.
- The line manager or commissioning member of staff should discuss any role-specific safeguarding requirements with the post holder. Together they will review the nature of the work and decide if specialist training will be provided.

Providing a safe and secure physical environment and activities

- All team members should be proactive in taking appropriate, proportionate, preventative steps to reduce the risk of, or perception of, harm occurring; especially concerning children and adults at risk. They will seek to protect those that are at risk of being harmed and respond well to those that have experienced harm. We will undertake appropriate risk assessments for any activities intentionally involving children or adults at risk (eg. child speaking or performing at a conference or leading a consultation event with others).
- We will provide a safe physical environment by applying health and safety measures in accordance with the law, regulatory guidance, and good practice.

Providing a safe online environment

- We will manage the risks of our technology both on and off the premises and online platforms through which Challenge Partners 's activities are being delivered. These risks will include:
 - **content:** being exposed to illegal, inappropriate, or harmful material
 - **contact:** being subjected to harmful online interaction with other users
 - **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
 - **contract:** being exposed to inappropriate or unsuitable commercial risks
 - **AI & synthetic media:** Exposure to or targeting by AI-driven threats, including synthetic media (deepfakes), voice cloning, automated grooming, and AI-enabled scams designed to target or impersonate team members, participants or partner organisations
- We will review and update our information systems' security regularly, ensuring that appropriate filtering and monitoring systems are in place when team members or those we work with are accessing any systems or internet provision.
- We will examine and risk assess any social media platforms and new technologies before they are used within the organisation; especially when applied for use with children and adults at risk.
- We will always act to remove hateful and inappropriate content targeting our team members.

Prevention and Management of AI-Related Safeguarding Risks

- **Protecting Sensitive Data & Beneficiary Images:** No identifiable photos, video, audio recordings, or sensitive personal data of vulnerable beneficiaries or team members may be uploaded, processed, or inputted into unvetted public or third-party consumer AI platforms.

CHALLENGE PARTNERS

- **Verification Protocols for AI Scams:** Any unusual, urgent, or distressed requests for funds, sensitive data, or access—even if conveyed via convincing voice notes, video, or official-looking messaging—must be independently verified through a trusted secondary channel before taking action.
- **Reporting Deepfakes and AI Misuse:** Any discovery or suspicion of synthetic media generation, deepfakes, or AI-driven impersonation targeting beneficiaries or team members must be reported immediately to the Designated Safeguarding Lead (DSL). Incidents involving vulnerable individuals will be treated as severe safeguarding breaches and escalated to statutory authorities where appropriate.

Adopting safer working practices

- We have relevant codes of conduct for all our team members. These safer working practices support us in being alert to potential abuse or neglect indicators and the risks that individual abusers, potential abusers, or those with poor professional practice or boundaries may pose.
- We will not accept the behaviour of any individual that threatens the safety or leads others to feel unsafe, including any breach of our safeguarding Code of Conduct ([Annex A](#)). We maintain a zero-tolerance approach to bullying, harassment and intimidation. Such behaviour will be treated as a serious concern and may result in a decision to remove the individual from our team.
- Where appropriate, we will explain the standards of behaviour expected from participants of our activities and consequences where they are not met.

Supporting, supervising and managing our team

- Challenge Partners will provide effective management for team members through supervision, support, and quality assurance measures.
- Any team member who believes that they are not receiving the support necessary to meet their safeguarding duties should raise this with their line manager or commissioning member of staff, or if necessary the DSL or Lead Trustee without fear of penalty or victimisation.

Receiving and responding to safeguarding disclosures, concerns and allegations

- If there is an allegation, signs and indicators of abuse are identified or if at any point someone involved with Challenge Partners' work fails to comply with any element of the Code of Conduct this information must be promptly and appropriately reported to Challenge Partners' DSL. If team members are in any doubt about recording and reporting requirements, they should discuss their concerns with the DSL.
- We recognise that those in positions of responsibility may abuse their power and exploit or harm others. We seek to act to deal with any abuse and to challenge any abuse of power, especially by anyone in a position of trust or responsibility.
- If we become aware of abuse, neglect or harm, we will provide support and make sure that our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole into account.

CHALLENGE PARTNERS

- We will report any serious incidents related to safeguarding, which have caused or risk significant harm to beneficiaries and other people who come into contact with Challenge Partners, to the Charities Commission.

Managing and processing data appropriately

- We will record all safeguarding concerns, discussions and decisions (and justifications for those decisions) promptly and appropriately in writing, recording and storing information professionally and securely and in line with established procedures.
- We will keep any information confidential and proactively share concerns and relevant information appropriately with agencies who need to know; especially concerning issues involving children, adults at risk, parents, families and carers.
- We will ensure that images of children and adults at risk are used only after their permission has been obtained, and only for the purpose for which consent has been given.

Learning from our experiences and reviewing

- Challenge Partners will review its policy, procedures and good practice at regular intervals and at least once per year.

Related policies and procedures

This policy statement should be read alongside Challenge Partners' 's other organisational policies and procedures (which will be made available to team members when beginning their activity with us).

Annex A: Safeguarding Code of Conduct

This Safeguarding Code of Conduct sits alongside the wider Challenge Partners Code of Conduct. All team members must comply with this Code of Conduct.

This is not an exhaustive list of behaviours. All Team Members should ensure that every person who works for or comes into contact with us should be treated with dignity and respect and feel that they are in a safe and supportive environment. They must avoid any conduct which would lead any reasonable person to question their motivation and intentions.

You must:

- Act in accordance with the partner school's policies and procedures regarding child protection and safeguarding, including mobile phone-free environment policies
- Treat all young people with respect.
- Avoid being alone with a young person or cause someone else to be alone with a young person because of your actions e.g. being late. If alone in a room with young people, keep the door open at all times.
- Be aware that any physical contact with a young person can be misinterpreted and should always be avoided. Shaking hands in a public setting is considered acceptable.
- Be aware that social networking sites are in the public domain if not protected by privacy settings. Strongly consider strengthening any privacy settings so that young people would not be able to access your online profiles and be privy to any information you would not want in the public domain.
- Block any young people that approach you online and inform Challenge Partners' DSL immediately.
- Recognise that special caution is required when discussing sensitive issues with young people.
- Challenge unacceptable behaviour and report all allegations/suspensions of abuse to the Challenge Partners' DSL.
- Operate within Challenge Partners' procedures in the event of any disclosure/concern.
- Raise any questions or concerns about child protection and safeguarding with Challenge Partners' DSL, or if unsure of a school's procedure, information should be sought from school staff.

You must not:

- Promise confidentiality to young people in any situation.
- Seek out or add young people on any social networking site.
- Respond to any online communication from a young person, for example on a social networking site.

CHALLENGE PARTNERS

- Share any personal contact details with young people, or, seek out their personal contact details.
- Act in a manner that excludes the young people you are working with.
- Make suggestive or derogatory remarks in front of young people.
- Have inappropriate physical contact or verbal contact with young people.
- Show favouritism to any individual.
- Be under the influence of alcohol or other substances when working on activities involving young people.
- Take photographs of young people
- Use AI tools to generate, alter, or manipulate images, video, or audio of young people, participants or team members.

Annex B: Role of the Designated Safeguarding Lead (DSL)

The DSL has the overall responsibility for the day-to-day oversight of safeguarding systems at Challenge Partners.

The current DSL is:

Nikita Vyas, Head of Programmes and Networks

Email: nikita.vyas@challengepartners.org

Telephone: 020 8017 3760

The current Deputy DSLs are:

Georgina Lambton, Partnership Experience Manager

Email: georgina.lambton@challengepartners.org

Telephone: 020 8017 3760

Jane I'Anson, Head of Partnership Reach and Experience

Email: jane.ianson@challengepartners.org

Telephone: 020 8017 3760

Junia Charlton, Programmes Manager

Email: junia.charlton@challengepartners

Telephone: 020 8017 3760

It is the role of the DSL and deputy DSLs to:

- Act as the central contact point for all team members to discuss any safeguarding concerns
- Be available for permanent or temporary team members to discuss any safeguarding concerns
- Maintain a confidential recording system for safeguarding incidents, concerns and allegations (known as a "Safeguarding Log")
- Coordinate safeguarding action for individual children and adults at risk of harm
- Liaise with other agencies and professionals in line with relevant statutory guidance
- Ensure that locally established referral procedures are in place and being followed as necessary
- Represent the organisation, or ensure that it is appropriately represented, if invited to attend multi-agency safeguarding meetings (including Child Protection conferences and Adult Safeguarding assessment meetings).

CHALLENGE PARTNERS

- Ensure that all new team members are aware of Challenge Partners 's internal safeguarding processes.
- Ensure all team members access appropriate safeguarding training and relevant updates in line with the most recent statutory guidance relevant to our activities
- Ensure that policies are reviewed at least annually and when required.

Review Dates

<u>Date</u>	<u>Reviewer</u>	<u>Changes</u>
June 2023	Roisin Killick (DSL)	Policy rewritten following SG audit
January 2024	Nikita Vyas (DSL)	DSL updated
July 2024	Nikita Vyas (DSL)	Minor revisions, including deputy DSLs
August 2025	Nikita Vyas (DSL)	Minor revisions, including deputy DSL
September 2026	Nikita Vyas (DSL)	Deputy DSLs and AI risks updated