

One Million Mentors (1MM)

Safeguarding Children Policy

This policy has been created to ensure the safeguarding of all those involved with the One Million Mentors Programme.

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1. Purpose

One Million Mentors (1MM) is committed to ensuring all necessary steps are taken to protect children and young people (CYP) from harm and to creating a culture of safety, equality and protection for children and young people who enter mentoring relationships through our partner organisations.

One Million Mentors will encourage and support partner organisations, including Schools, Colleges, Universities, Community Groups and Employer Organisations to adopt and demonstrate their commitment to the principles and practice of equality as set out in this Safeguarding policy and procedures.

1MM is committed to continuous learning and will review any safeguarding incident so that any lessons can be learned and shared appropriately with organisational staff.

2. Scope

This policy applies to all 1MM employees, consultants, contract workers, agency workers, trustees and volunteer workers including mentors, who are expected to comply with the requirements of this policy and be aware of their responsibilities for safeguarding and protecting children from harm. 1MM also recognises its duty of care to mentees over the age of 18, including those who our partner organisations deem to be adults at risk, for more information about Adults at Risk please refer to the specific [Safeguarding Adult Policy](#)

This policy is mandatory for everyone involved with 1MM, and failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

3. Principles

The guidance given in the policy and procedures is based on the following principles:

- Safeguarding children is everybody's responsibility; We all have a shared responsibility to ensure the safety and well-being of all children and will act appropriately and report concerns whether these concerns arise within One Million Mentors programmes
- The child's welfare is of paramount consideration
- A child centred approach is fundamental to safeguarding and promoting the welfare of every child
- All children, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.
- The rights, dignity and worth of all children will always be respected - Staff and mentors have an important role to play in safeguarding children and protecting them from abuse
- All allegations will be taken seriously and responded to quickly in line with One Million Mentors Safeguarding Children Policy and Procedures
- One Million Mentors recognises the role and responsibilities of the statutory agencies in safeguarding children and is committed to complying with local safeguarding procedures

1MM seeks to keep children and young people safe by:

- Having a Designated Safeguarding Lead (DSL), a strategic lead for safeguarding, and a Trustee responsible for 1MM's safeguarding arrangements
- Using safer recruitment practices for individuals who work regularly with children, including policies as to when partner organisations should complete a criminal records check
- Verifying that partner organisations have appropriate safeguarding policies in place
- Providing effective management of staff and mentors through supervision, support, training and quality assurance measures
- Adopting child protection and safeguarding practices throughout the mentoring process, including on our online platforms
- Delivering an appropriate level of safeguarding and child protection awareness training to all staff and mentors
- Ensuring that effective measures are in place to manage allegations, complaints and whistleblowing, including within partner organisations
- Recording, retaining and storing information professionally and securely in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the organisation's General Privacy Notice, and related confidentiality and retention procedures. - Sharing relevant information and concerns appropriately with individuals or agencies who need to know, including partner organisations and local safeguarding leads in accordance with data protection legislation and regulations - Seeking and listening to the views of children and young people, taking account of their wishes and feelings when reaching decisions that affect them as individuals and in the development of mentoring services
- Working with partner organisations in applying Health and Safety measures as set out in the policies of partner organisations to ensure that all activities are delivered in a safe and supportive environment.

4. Definitions

1. **Safeguarding and promoting the welfare of children** has been defined by 'working together to safeguard children' as:
 - a. protecting children from maltreatment
 - b. preventing impairment of children's mental and physical health or development
 - c. ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
 - d. taking action to enable all children to have the best outcomes
1. **Child protection** has been defined as: Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

2. **A child/young person** is defined as anyone who has not reached the age of 18. This is enshrined in UK law and the UN Convention of Human Rights. For the purposes of this policy and relevant procedures the term "**child**" and "**young person**" are used to mean the same thing.
3. **Abuse** is defined by 'working together to safeguarding children as: *"A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children."*

Further definitions of terms can be found in Appendix 2.

5. Legal Framework and relevant policies

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely:

- Children Acts 1989 and 2004
- Children and Social Work Act 2017
- Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data Use and Access Act 2025 - Equality Act 2010
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education 2023
- Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers 2018

1MM will work with partner organisations to ensure that mentors have access to similar supporting materials within their relevant business areas and attention is also drawn to 1MM's internal procedures.

Where safeguarding activity involves the processing of personal data, including special category data and criminal offence data, 1MM will do so in accordance with the UK GDPR, the Data Protection Act 2018, its General Privacy Notice, and any applicable information sharing arrangements with partner organisations.

Where personal data is shared with partner organisations in connection with safeguarding, each party will be expected to understand and fulfil its own data protection responsibilities, including where parties act as independent controllers or jointly determine the purposes and means of processing.

6. Review and Audit Process

1MM is committed to continually reviewing and evaluating our safeguarding practice and policies. A safeguarding policy review will take place annually, and a comprehensive safeguarding audit will take place every 3 years.

This policy will also be reviewed earlier where required to reflect changes to safeguarding law or guidance, data protection law, operational practice, or the organisation's General Privacy Notice.

7. Roles and Responsibilities

7.1 Designated Safeguarding Lead (DSL)

Is the nominated safeguarding and child protection lead for 1MM, responsible for oversight of safeguarding policies and procedures, is the strategic lead for safeguarding across 1MM, and provides operational support and advice on safeguarding across the organisation.

Strategy:

- Designated lead for safeguarding across 1MM
- Leads annual review of all safeguarding policies, and regular audit of 1MM's safeguarding framework (every 2 years)
- Point of contact for 1MM's safeguarding consultant

Compliance:

- Oversees completion of DBS process for people joining the organisation and ensuring updates take place as required (with support from the EA)
- Advises CEO on any external reporting related to safeguarding
- Draft quarterly safeguarding report for 1MM Trustees meeting
- Prepare annual organisational safeguarding report
- Manages information sharing and safeguarding and child protection records, ensuring that information is shared lawfully, on a need-to-know basis, and in line with the organisation's General Privacy Notice, confidentiality requirements, and retention procedures.
- Meet with Trustee responsible for safeguarding on a quarterly basis
- Ensure that safer recruitment processes are in place, reviewed and reflected in the 1MM Recruitment and Selection Policy for Staff and the 1MM Recruitment and Selection Policy for Mentors

Managing concerns and incidents:

- Act as point of escalation and advice for the DSO when managing safeguarding concerns
- Act as single point of contact for staff, mentors, mentees and other agencies and organisations for serious cases

- Provide safeguarding advice and support for all staff, mentors, and mentees as required
- Supports the Head of Delivery with the management of safeguarding concerns and external referrals
- Oversees tracking and management of safeguarding incidents and case.
- Leads on 'lessons learned' exercises following any significant incidents

Training:

- Oversight of completion of safeguarding training for all staff across 1MM (with support from the EA)
- Induct all new staff who DO NOT have delivery roles into 1MM's safeguarding policies and practices
- Ensures up to date role specific training is provided for all roles with safeguarding responsibilities
- Works with the Head of Learning and Development to identify learning and development needs and opportunities around safeguarding for the organisation, ensuring 1MMs training offer is fit for purpose

7.2 Designated Safeguarding Officer (DSO)

Responsible for oversight of safeguarding practice across all of 1MMs delivery activities, provides direct support and advice to 1MM staff on safeguarding concerns relating to mentees, mentors, and youth partners. Deputises for the DSL as required.

Compliance:

- Ensures all Youth Partner organisations are aware of their safeguarding responsibilities and are compliant with 1MM's policies and procedures relating to safeguarding
- Monitoring compliance with all 1MM safer recruitment responsibilities for mentors, including suitability checks, DBS, and training)
- Ensure that safer recruitment processes reflected in the 1MM Recruitment and Selection Policy for Staff and the 1MM Recruitment and Selection Policy for Mentors are followed
- Manages information sharing across youth partner organisations around safeguarding and child protection concerns, ensuring such sharing is lawful, necessary and proportionate, is limited to those who need to know, and complies with 1MM policies and processes (and delegating to regional managers as appropriate)..
- Follow up on any DBS concerns for mentors and escalate to SMT and the CEO as required
- Oversee vulnerability checks for mentees and mentors, and delegate responsibility to regional managers as required

Managing concerns and incidents:

- Act as first point of escalation and advice for all delivery roles, and managing safeguarding concerns

- Provide safeguarding advice and support for all staff, mentors, and mentees as required
- Oversee the management of safeguarding concerns and external referrals.
- Ensures accurate record keeping and tracking of safeguarding cases and concerns

Training:

- Induct all new staff who have delivery roles into 1MM's safeguarding policies and practices
- Ensuring that all members of the delivery team complete required safeguarding training
- Works with the Head of Learning and Development and DSL to identify training needs and opportunities around safeguarding for the delivery team

7.3 Line Managers

All staff with line management responsibilities within 1MM have additional responsibilities related to safeguarding which include:

- Providing the initial response to safeguarding incidents and concerns within a geographical or functional area
- Ensuring that safeguarding concerns are escalated immediately to the DSO, and supporting the DSO in managing such concerns as appropriate
- Following 1MMs safer recruitment policies practices, as outlined in 1MMs safer recruitment policy
- Support setting a strong culture of safeguarding across the organisation
- Ensures all direct reports are compliant with organisational requirements around safeguarding policies, procedures, and training
- Ensuring all external stakeholders they are responsible for are compliant and adhering to 1MMs safeguarding policies and procedures (including youth partners, and employer organisations)

7.4 Head of Learning and Development

- Works with the DSL and Head of Delivery to develop robust and effective safeguarding learning and development content for external stakeholders and ensure it is delivered effectively
- Works with the DSL and Head of Delivery to identify learning and development needs and opportunities around safeguarding for the organisation, ensuring 1MMs training offer meets its needs
- Ensures the requirements for safer recruitment, as outlined in the safer recruitment policy are met for all facilitators
- Ensures that 1MM's safeguarding policies and procedures are embedded across the 1MM platform and website, with the support of the Social Media Assistant

7.5 External Data Protection Officer

1MM has appointed an external Data Protection Officer (DPO-as-a-Service), Trust Keith, to support compliance with the UK GDPR and Data Protection Act 2018.

- Provides independent advice and oversight on data protection, including the handling of safeguarding-related personal data.
- Advise on data protection obligations and lawful processing
- Support policies and practices relating to data protection and safeguarding
- Monitor compliance and provide guidance on data sharing and risk
- Advise on data breaches and impact assessments (DPIAs)
- Act as a contact point for the ICO, where appropriate
- This role supports, but does not replace, the responsibilities of staff, managers, or safeguarding leads.

7.6 Head of Technology

- Developing tools and processes to support safeguarding within the 1MM platform
- Ensuring rigour throughout the user journey on the 1MM platform, ensuring 1MM's safeguarding standards are met
- Ensuring that the personal data of young people and other stakeholders is adequately protected, and acting as the organisation's appointed Data Protection Lead

7.7 Chief Commercial Officer (CCO)

- Ensures all employment organisations are aware of their safeguarding responsibilities and are compliant with 1MM's policies and procedures relating to safeguarding
- Works with the Social Media Assistant to ensure that all externally facing content reflects organisational safeguarding standards, including the 1MM website and social media platforms

7.8 Chief Executive Officer (CEO)

- Overall accountability for safeguarding across 1MM
- Sets the organisational culture for safeguarding and ensures that the DSL is appropriately resourced and supported to carry out the duties of the role
- Identifies budget for safeguarding training and other safeguarding activities
- Liaises with the board of trustees to report on organisational safeguarding and specific cases as required
- Works with the board of Trustees on any external reporting required related to safeguarding
- Acting as the spokesperson for 1MM in any required crisis communications

7.9 Board of Trustees

- Reviews and approves the Safeguarding Policy each year
- Has a named Trustee with specific responsibility for safeguarding.
- Responsible for decision making on any external reporting

7.10 All staff

All staff working for 1MM have a series of responsibilities relating to safeguarding, including:

- Raising awareness of safeguarding across staff and mentors
- Plan and conduct their work in ways that minimise situations in which abuse might occur, including running safe activities and events (both in person and online)
- Responsible for ensuring that the welfare of mentees remains paramount in all that we do
- Responsible for promoting and upholding safeguarding standards, and reporting complaints, concerns and incidents
- Ensure compliance with all 1MM safeguarding policies, procedures (including DBS checks)
- Ensure completion of all mandatory safeguarding training

8. Safeguarding processes and procedures

8.1 Safer Recruitment and Selection Processes

1MM recruits and selects staff in line with safer recruitment best practice. Safer recruitment is a set of practices to help make sure your staff and volunteers are suitable to work with children and young people. 1MM's approach is detailed in the 1MM Recruitment and Selection Policy for Staff.

1MM liaises with Mentoring Co-ordinators and Safeguarding Leads within partner organisations to ensure that robust safer recruitment and selection processes are in place when matching potential mentors. This includes completing relevant DBS checks and obtaining at least two positive suitability checks.

8.2 Management of staff

1MM delivers online training on the role of a mentor. Partner organisations are required to assign a Mentor Coordinator to provide support to both mentors and mentees, along with liaising with 1MM on issues relating to quality assurance and delivery.

8.3 Safeguarding Children Training

All staff and mentors receive safeguarding and child protection training appropriate to their role. This is delivered through 1MM's online platforms or during face to face induction training.

All staff and mentors will also receive refresher and update safeguarding and child protection training appropriate to their role.

8.4 Code of conduct

All 1MM mentors are required to understand and follow the 1MM Code of Conduct at all times and are required to confirm their understanding and commitment to this via the 1MM platform. Mentors are also required to review the 1MM Mentoring Agreement with their mentee during their first mentoring session to ensure a shared understanding of the principles of mentoring, particularly related to safeguarding responsibilities.

8.5 Responding to allegations, observations or admissions of abuse

It is important to remember that, although staff and mentors are not expected to be experts in identifying child abuse, they do have a duty of care to respond appropriately to any issues which may arise.

Issues may arise through the mentor identifying concerns through observation, through changes in the child or young person's behaviour, through what the child or young person says including a direct allegation of abuse whether inside (intra-familial) or outside (extra-familial) the home.

They should understand their role in keeping mentees safe and know who to contact within the relevant partner organisation to report or seek advice on safeguarding issues. This will usually be the Designated Safeguarding Lead or Mentor Coordinator.

A flowchart of how to report a concern can be found in Appendix 1.

8.6 Complaints and whistleblowing

1MM sets out the high standards of integrity expected from all our people, including staff, volunteers, consultants and contract workers in the 1MM whistle blowing policy. This policy also is designed to help anyone working at or with 1MM, at any level, to raise any serious concerns they may have about colleagues or their employer, and how they will be protected if they raise a whistleblowing concern. 1MM ensures that partner organisations have similar procedures in place for managing allegations, complaints and whistleblowing and that they are readily accessible to mentees and mentors.

8.7 Information management

1MM's Confidentiality Policy outlines the organisational approach to recording and sharing child protection concerns and ensuing actions. Safeguarding people from harm and abuse often requires information sharing between services and organisations. Information will only be shared where this is lawful, necessary and proportionate in order to protect the safety and wellbeing of a child, young person or adult at risk, and only with those who need to know. The minimum necessary information should be disclosed for the relevant safeguarding purpose.

Information sharing for safeguarding purposes does not rely on consent where another lawful basis applies. Personal data may be shared where it is necessary and proportionate to protect a child, young person or adult at risk, including under legal obligation or legitimate interests.

Decisions to share information should be based on professional judgement, taking into account the risk of harm and the need to act in a timely manner. Data protection considerations must not prevent appropriate safeguarding action where there is a risk of harm.

Information will only be shared where it is lawful, necessary and proportionate to protect the safety and wellbeing of a child or adult at risk. Only the minimum necessary and relevant information will be shared, and only with those who need to know.

Safeguarding-related processing may include the use of personal data, special category data and, where relevant, criminal offence data. Such processing will be undertaken in accordance with the UK GDPR, the Data Protection Act 2018, the organisation's General Privacy Notice, and any applicable legal or regulatory

obligations.

Records of safeguarding concerns, decisions, actions taken and disclosures made must be accurate, stored securely, and retained in line with the organisation's retention schedule and General Privacy Notice.

As outlined in the mentor agreement/code of conduct, information will be shared with a youth partner if a mentor has concerns relating to the safety and wellbeing of a child or young person, or where such sharing is otherwise necessary for safeguarding, legal or regulatory reasons.

Where safeguarding information is shared with partner organisations, roles and responsibilities for that personal data must be clearly understood, including whether each organisation is acting as an independent controller or jointly determining the purposes and means of processing.

Where concerns relate to individuals in positions of trust, information may be shared promptly with relevant authorities, including the Local Authority Designated Officer (LADO), where required for safeguarding purposes.

All safeguarding records and disclosures will be documented and retained in line with the organisation's General Privacy Notice and retention schedule.

8.8 Seeking and listening to the views of children, young people and vulnerable adults

Safeguarding policies and procedures are reviewed on a regular basis and 1MM, through the use of surveys and mentoring outcomes, will use the views of mentees to inform and evaluate the mentoring process.

Where feedback or evaluation activity involves the collection or use of personal data, this will be carried out in line with the organisation's General Privacy Notice and any applicable lawful basis.

8.9 Anti-bullying policy

1MM believes that mentoring relationships should take place in an atmosphere free from all forms of harassment and bullying. 1MM's Anti-bullying and dignity at work policy outlines these expectations. As part of the collaboration agreement, 1MM requires partner organisations to have similar guidelines in place.

8.10 Health and Safety Policy

1MM is committed to ensuring that mentoring relationships are conducted in safe and secure environments in which young people can thrive and develop. 1MM outlines guidance and expectations within the Health and Safety Policy. As part of the collaboration agreement, 1MM requires partner organisations to have similar guidelines in place.

9. Virtual Mentoring

For mentees who are over the age of 18, mentors and mentees might choose to meet

individually online as well as, or instead of, face to face. This is only available to mentees over the age of 18 as all mentoring sessions for under 18s must be supervised by the youth partner, whether the meeting is in person or online.

It is important to remember that safeguarding remains an essential part of delivering events and activities virtually and the 1MM Code of Conduct still applies, though virtual sessions might present different challenges in identifying safeguarding concerns. Guidance on 1MMs approach to virtual mentoring can be found in the Virtual Mentoring Guide for Mentors, and the Virtual Mentoring Guide for Mentees, which are also available on the 1MM website and online platform.

Any personal data processed through virtual mentoring arrangements, online platforms, communications tools or related records must be handled in accordance with the UK GDPR, the Data Protection Act 2018 and the organisation's General Privacy Notice.

If a mentor or mentee presents a concern virtually it still should be addressed following the process outlined in Appendix 1.

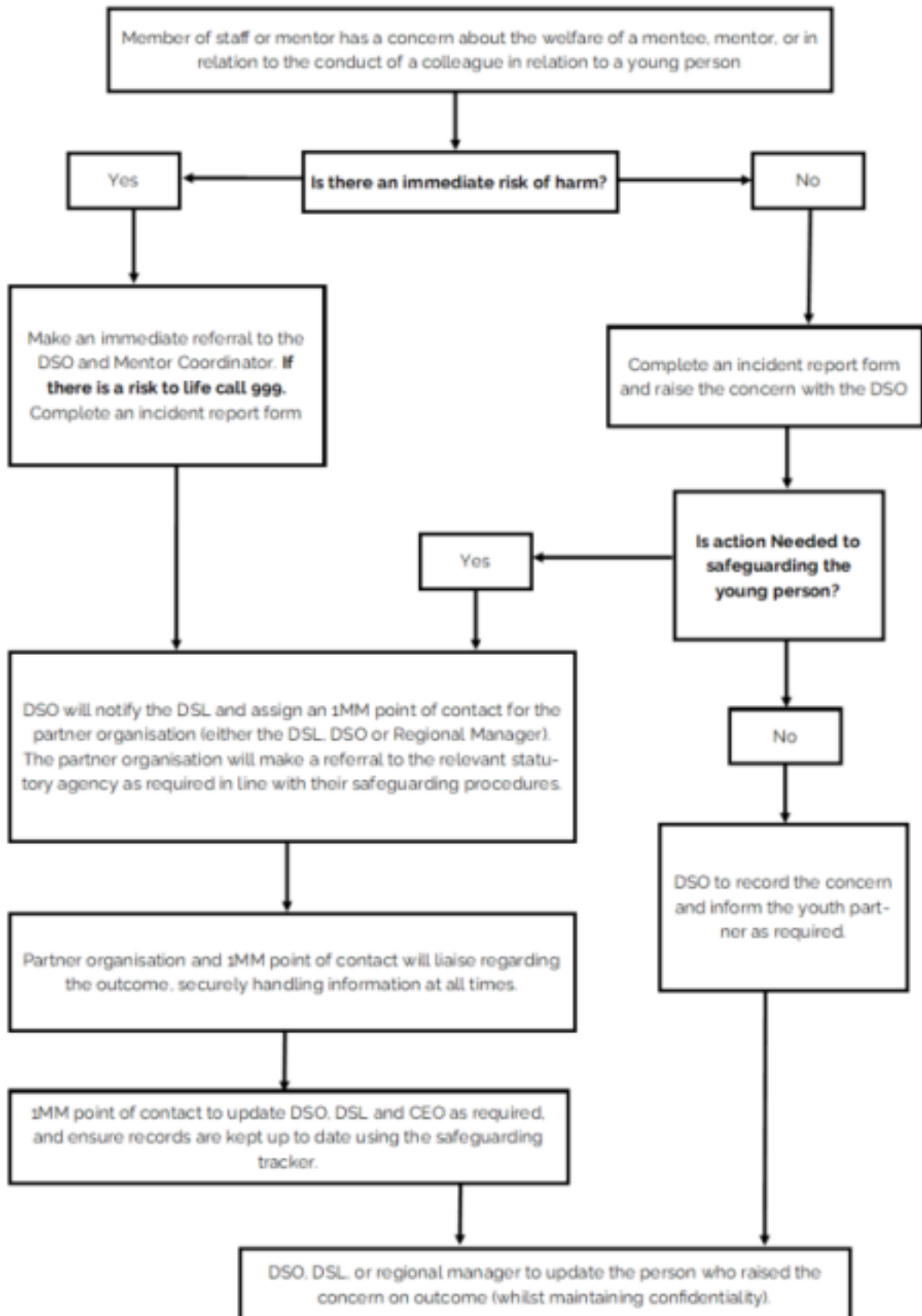
10. Data Protection, retention and rights

Safeguarding records and related personal data will be retained only for as long as necessary in line with the organisation's retention schedule, General Privacy Notice, legal obligations and safeguarding responsibilities. Retention periods for safeguarding records may vary depending on the nature and severity of the concern.

Individuals' data protection rights are set out in the organisation's General Privacy Notice. Those rights may be subject to lawful limitations where personal data must be retained or shared for safeguarding, legal, regulatory or public protection purposes.

Questions about the processing of personal data, including safeguarding-related personal data, should be directed to dataprotection@1MM.org.uk marked for the attention of Data Protection.

Appendix 1: Safeguarding children flowchart



Appendix 2: Definitions of terms

1. Abuse

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

2. Definition of a Child

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, does not change their status or entitlements to services or protection.

3. Types of Abuse

3.1. Emotional abuse

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

3.2. Neglect

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

- a) Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- b) Protect a child from physical and emotional harm or danger
- c) Ensure adequate supervision (including the use of inadequate caregivers)
- d) Ensure access to appropriate medical care or treatment

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

3.3. Physical abuse

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

3.4. Sexual abuse

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

Appendix 3: Useful Contacts

1. Child Exploitation and Online Protection Centre (CEOP)

www.ceop.police.uk

2. NSPCC Helpline

Tel: 0808 800 5000

Useful Links

1. What to do if you're worried a child is being abused - 2006.

2. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

3. Working Together to Safeguard Children 2018

4. **Working Together to Safeguard Children: a guide to inter-agency working to safeguard and promote the welfare of children (PDF)**