



Nottingham Trent  
University

# Safeguarding Policy

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Date: 21 October 2024

<b>Policy owner</b>	Director of Student Services
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## Version history

<b>Version</b>	<b>Author</b>	<b>Date</b>	<b>Version details</b>	<b>Reviewer</b>	<b>Date</b>
1.0	Jamie Marshall	Nov 2011	• Original	Strategic group, Angie Pears, Staff consultation	Jan 2012
2.0	Jamie Marshall	Oct 2012	• Annual review, update DCPO details	N/A Operational update	Oct 2012
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3.1	Jamie Marshall	Feb 2015	• Updated Safeguarding Officer Details	N/A Operational update	Feb 2015
4.0	Jamie Marshall	Nov 2015	• Updated policy definitions • Inclusion of guidance relating to 'Prevent' • Removal of annexes and development of a separate document titled 'Safeguarding Children & Vulnerable Adults Guidance for Staff'	Key staff in areas of work directly relevant to safeguarding, Prevent Steering Group, NTSU Board of Trustees, NTU University Executive Team	Dec 2015
4.1	Andy Coppins	Mar 2017	• Updated Safeguarding and Prevent Contact details	N/A Operational Update	Mar 2017
4.2	Katie Lavery	Jan 2018		• Updated Safeguarding and Prevent Contact details N/A Operational Update	Jan 2018
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4.4	Jess Buckley	Nov 2018	• Updated Safeguarding Officer details	N/A Operational Update	Nov 2018
4.5	Michael Macleod	Jul 2019	• Updated to include Apprenticeships within scope of policy • Updated Definitions • Updated with reference to most current legislation • Updated Policy Title • Replicated changes in Guidance document.	Sarah Bustard	Aug 2019
4.6	Sarah Bustard	Nov 2020	• Updated Safeguarding and Prevent Contact details	N/A Operational Update	Nov 2020
4.7	Daniel Hendry	Mar 2022	• Updated Safeguarding and Prevent Contact details • Additions to 'forms of abuse' 'Peer on Peer' abuse and online harms now included.	N/A Operational Update	Mar 2022
5.0	Claire Brown	May-Aug 2024	• Policy review and re-write	Safeguarding Steering Group and University Executive Team	Oct 2024

# 1. Introduction

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Nottingham Trent University (NTU) is committed to practice that is safe and protects all individuals from harm. NTU believes everyone has the right to work, learn and achieve their potential within a safe environment, without risk of harm from abuse, discrimination, harassment, assault or bullying, in all its forms and in any circumstances.

NTU has a legal duty to safeguard, protect and promote the welfare of children (under 18 years of age) and 'adults at risk of harm' as defined in the Care Act 2014.

NTU has a legal duty to safeguard staff and students from becoming terrorists or supporting terrorism (The Prevent Duty, 2015).

## 2. Purpose

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The purpose of NTU's Safeguarding Policy is to outline the processes, procedures and responsibilities in place to safeguard the NTU community. This includes:

- Legislative requirements to safeguard children and adults at risk of harm;
- The training, policies, procedures and guidance available to students, staff, volunteers, contractors and visitors;
- Roles and responsibilities;
- The available reporting and escalation routes for safeguarding concerns; and
- Legislative requirements in relation to the Prevent Duty.

Detailed information about how and when to make a safeguarding referral is [on MyHub](#).

## 3. Scope

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This policy applies to:

- All NTU students from enrolment (or arrival in halls of residence, if earlier) up to completion of their programme of study at the University (or departure from halls of residence, if later). The policy applies to students' conduct on and off the University's premises and/or during all University-related activities, including online and face-to-face.
- All NTU staff, consultants and contractors, including full-time, part-time, permanent and temporary staff, and workers who are engaged on a casual or irregular basis (including hourly paid lecturers, guest speakers, invigilators, sports coaches, external examiners etc.), both on and off the University's premises when undertaking University activities.
- Some staff and students are required to be registered with or accredited by professional bodies, which impose their own professional standards or fitness-to-practice regulations. This policy is complementary to, and does not replace, those standards and regulations or professional misconduct policies. Misconduct could result in disciplinary action by both the professional body and the University.

- If the University-led activity is hosted by another organisation on their premises, the host organisation's Safeguarding Policy and related procedures will normally take precedence. Members of the University engaging in those programmes must also take note of, and act in accordance with, NTU's Safeguarding Policy.
- External bodies utilising the University's premises are expected to have their own safeguarding policies and procedures in place and will take full responsibility for the safeguarding of individuals involved in any related activities.

## 4. Key responsibilities

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Appendix A provides an overview of NTU's roles and responsibilities.

NTU's Governor Safeguarding Lead is David Williams. NTU's UET Safeguarding Lead is Steve Denton, Chief Operating Officer and Registrar. NTU's two Strategic Safeguarding Leads are Michael Lees, Director of Student Services and Gareth Williams, Associate Dean for International, Recruitment and Strategy (School of Social Sciences).

NTU's Designated Safeguarding Lead (DSL) is Sarah Bustard, Head of Student Health and Wellbeing Services.

NTU has two Deputy Designated Safeguarding Leads (DDSL). The NTU Further Education DDSL is Eileen Swan, Head of Department, School of Animal, Rural and Environmental Sciences. The Institute of Education DDSL is Rachael Webster, Senior Lecturer.

The names and contact details of Area Safeguarding Leads (ASL) and Designated Safeguarding Officers (DSO) are on [MyHub](#).

In order to safeguard children and adults at risk of harm, the University will:

- Provide a clear and accessible way(s) for staff, students and third parties to make a [Safeguarding Referral](#) for investigation.
- Provide role-specific training for NTU staff and keep records of who has been trained and when.
- Appoint a Designated Safeguarding Lead and have clear roles and responsibilities for staff who are key points of contact in safeguarding children and adults at risk of harm.
- Implement Safer Recruitment processes to ensure staff undertaking activities with children and adults at risk of harm are subject to relevant procedures.
- Assess risks to children and adults at risk of harm to ensure appropriate control measures are implemented.
- Undertake preliminary investigation when a safeguarding report is received.
- Follow established processes to escalate safeguarding concerns to the relevant external organisation(s).
- Maintain a central register of all safeguarding reports received.
- Maintain a register of DBS checks for students and staff.

University **staff** are expected to:

- [Report](#) any safeguarding concerns promptly.
- Ensure that their behaviour does not place vulnerable groups at risk of harm.
- Identify situations in which vulnerable groups may be placed at risk of harm and implement suitable mitigations.

- Undertake the required level of safeguarding training.
- Take part in vetting procedures, where required, in line with [NTU's DBS Policy](#).
- Not bring children or adults at risk of harm into university work areas. If there are exceptional circumstances, staff must receive permission from their line manager.

University **students** are expected to:

- [Report](#) any safeguarding concerns promptly.
- Ensure that their behaviour does not place vulnerable groups at risk of harm.
- Comply with the safeguarding procedures, policies and training in organisations where they are undertaking a placement, project, internship or volunteering.
- Take part in vetting procedures, where these are a requirements of undertaking work in an external organisation.
- Not bring a child or adult at risk of harm into university teaching areas. If there are exceptional circumstances, students must obtain permission from an appropriate member of staff first (e.g. an academic delivering a teaching session).
- Not bring a child or adult at risk of harm into an area of the University with potentially hazardous materials (e.g. a lab or workshop).

University **visitors** are expected to:

- [Report](#) any safeguarding concerns promptly.
- Be responsible for supervising a child or adult at risk of harm they bring onto university premises (other than as part of a university-organised visit).
- Ensure that their behaviour does not place vulnerable groups at risk of harm.

University **contractors** are expected to:

- [Report](#) any safeguarding concerns promptly.
- Ensure their behaviour does not put vulnerable groups at risk of harm.
- Comply with vetting requirements, where NTU lawfully requires them to do so.

## 5. Reporting safeguarding concerns

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### Emergencies

Where there is an immediate risk of significant harm, the emergency services should be contacted by calling 999.

NTU Security can be contacted 24 hours a day, 7 days a week on 0115 848 2222.

Within 24 hours of the incident, a [Safeguarding Referral](#) should be made, including as much detail as possible.

### Reporting concerns where there is no immediate risk

Where there is no immediate risk, concerns about children and adults at risk of harm should be reported via a [Safeguarding Referral](#). Advice can be sought from [NTU's Designated Safeguarding Lead, Deputies or Officers](#). NTU aims to respond to such referrals within one working day.

Safeguarding concerns can be a direct disclosure, or you may notice someone's behaviour has changed. Staff should [report](#) all safeguarding concerns but are not expected to investigate them. NTU's Designated Safeguarding Lead (or a designated deputy) carries out preliminary investigations on all safeguarding referrals. They will liaise with the Local Authority, where appropriate.

## 6. Staff training

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All NTU colleagues undertake safeguarding training at induction, with regular refreshers thereafter. NTU's training is in two tiers:

**Basic training:** This training forms part of NTU's suite of essential online learning for all staff. It provides a basic understanding of safeguarding and how to report a concern. It is completed at induction, with a refresher every two years thereafter.

**Enhanced training:** This training is for those with safeguarding facing roles and for those who are a nominated person responsible for child protection and safeguarding children. This includes Further Education staff, Designated Safeguarding Officers, Designated Safeguarding Leads and Deputies, Area Safeguarding Leads, Strategic Safeguarding Leads, and other staff nominated by their line manager as requiring enhanced training. It is completed on commencement of role and then refresher training completed every two years as a minimum. For colleagues who work closely with children and adults at risk of harm, refresher training will be annual, in line with government guidance.

All training is recorded on NTU's e-learning platform and managers ensure that staff complete the necessary training.

**Prevent Duty** – mandatory Prevent training is undertaken by all staff during induction and refresher training every two years thereafter.

## 7. Safeguarding children and adults at risk of harm

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Some of the University's core activity involves children and adults at risk of harm. For each of the following areas of activity, specific safeguarding measures are in place to protect children and adults at risk of harm. The details of these measures are located within local departmental guidance documents:

- Delivery of level 2 and 3 provision – Further Education – to 16 and 17 year olds in the School of Animal, Rural and Environmental Sciences at Brackenhurst campus. [Further Education Safeguarding Policy](#)
- Confetti also deliver FE and have a separate [safeguarding policy](#), which will be reviewed as part of the Confetti integration.
- Under 18s studying on Higher Education courses.
- Under 18 students residing in NTU or UPP accommodation.
- NTU staff who could provide 1:1 support to children or adults at risk of harm, including Student Services, Accommodation Wardens, Security Officers, etc.

- NTU students undertaking placements, internships or projects in external organisations where they are working with children or adults at risk of harm.
- NTU staff and students undertaking outreach activities or volunteering in schools, colleges and partner organisations involving children or adults at risk of harm.
- The use of NTU premises or facilities by external organisations for events or activities involving children or adults at risk of harm.
- NTU staff, students or visitors who bring children or adults at risk of harm they care for onto NTU premises, including for events such as open days and graduation.
- NTU staff and students undertaking research involving children or adults at risk of harm.
- Using images, videos and other multimedia of under 18s.

## 8. Prevent Duty

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Prevent aims to safeguard people from becoming terrorists or supporting terrorism. NTU is committed to ensuring staff and students are not exposed to extremism which could lead to terrorism. See the [Office for Students](#) and [Department for Education](#) guidance on Prevent.

All Prevent concerns should be [reported online](#). Issues can be discussed with NTU's Prevent lead, Victoria Fanning.

## 9. Student safety and welfare

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As a predominantly higher education institution, the majority of learners are not children or adults at risk of harm. In many circumstances, a [wellbeing referral](#) would be the most appropriate escalation route.

NTU's [Wellbeing Team](#) can support students with a range of concerns including:

- Personal, emotional and mental health challenges.
- General wellbeing, including stress, low mood, homesickness, overwhelm etc.
- Sexual violence.
- Discrimination, bullying, harassment or hate crime.
- Significant life events impacting study e.g. bereavements, illness, being a victim of crime, pregnancy, gender identity, estrangement and family breakdown.
- Substance addiction.

The [online wellbeing referral form](#) can be completed by students, NTU colleagues or concerned others. If the form is completed on a student's behalf, it is better to get their consent where possible.

However, where there is a risk of significant harm to the student or others (including suicidal thoughts or attempts, self-harm and domestic violence) this should be reported, even in the absence of consent:

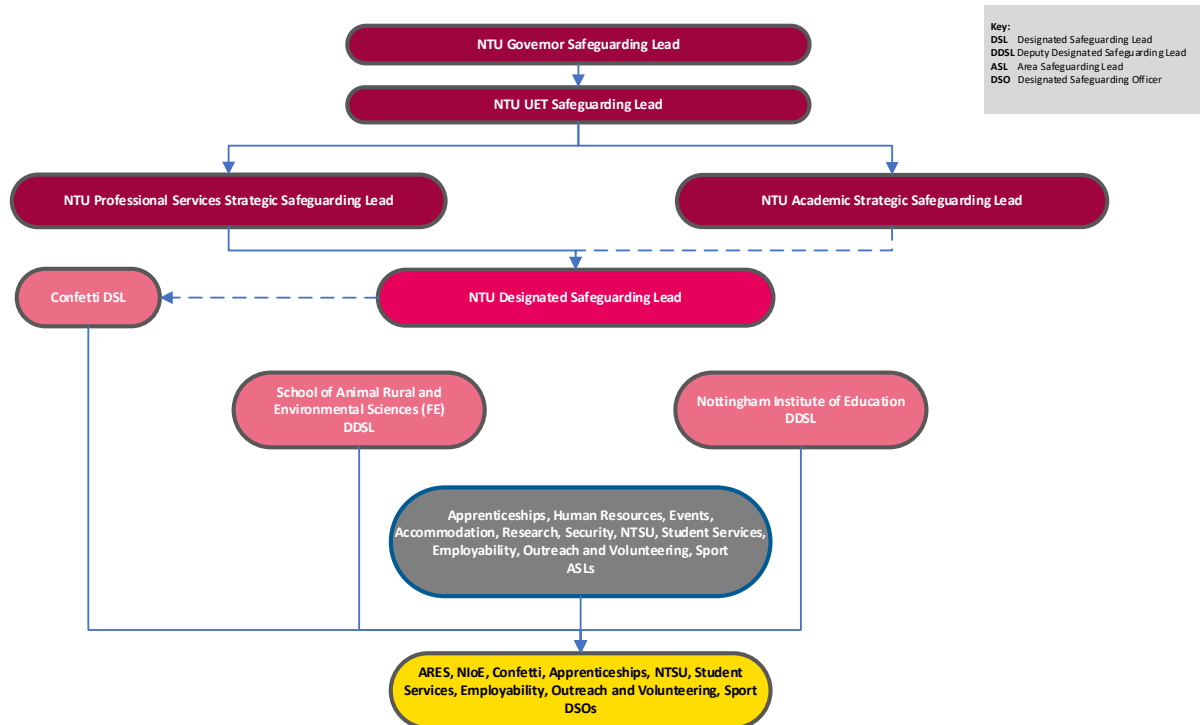
- If there is an immediate risk to life call 999.
- Submit a [NTU Wellbeing referral immediately](#) and state the risk clearly. If it is out of hours (after 5pm weekdays or at weekends) contact NTU Security on 0115 848 2222.
- The [NHS Mental Health Crisis Service](#) is open 24 hours a day, seven days a week, by calling 0808 196 3779.

NTU aims to respond to non-emergency wellbeing referrals within 1 working day (high risk) or 2 working days (lower risk).



# Appendix A: Roles and Responsibilities

## Safeguarding organisational structure



## Governor Safeguarding Lead (GSL)

Nominated by the Board of Governors and is expected to:

- Achieve assurance that NTU's approach to safeguarding complies with its legislative duties.
- Receive annual safeguarding reports.
- Provide their assessment of NTU's compliance with its safeguarding duties to Audit and Risk Management Committee and the Board of Governors annually.

## UET Safeguarding Lead (USL)

Nominated by the University Executive Team and is expected to:

- Provide strategic oversight of safeguarding, ensuring compliance with legislation and sector guidance.
- Receive an annual report from the Strategic Safeguarding Lead.
- Receive a termly safeguarding update from the Strategic Safeguarding Lead.
- Provide the annual report to the GSL and the Board of Governors.
- Approve NTU's Safeguarding Policy.
- Receive assurance that:
  - Appropriate policies and procedures are in place that support safeguarding;
  - Safer recruitment practices are followed;
  - There are clear and accessible ways to report safeguarding concerns;
  - A central record is maintained in relation to DBS checks;

- Arrangements are in place to investigate safeguarding referrals and escalate these to external organisations, where required.
- Staff understand their responsibilities and these are clearly articulated;
- Suitable training is available and is completed by staff; and,
- Students are provided with information about abuse and neglect, how to keep themselves safe and how to seek support.

### **Strategic Safeguarding Leads (SSL)**

NTU has two SSLs: the Director of Student Services and an Academic SSL who are expected to:

- Ensure NTU is compliant with relevant safeguarding legislation and sector guidance.
- Produce an annual Safeguarding report for the USL.
- Chair the University Safeguarding Steering Group.
- Own the safeguarding institutional risk register.
- Provide termly safeguarding updates to the USL.
- Represent NTU at the Nottingham Safeguarding Partnership meetings.
- Keep abreast of safeguarding policy changes and highlight these to the USL.
- Ensure that policy changes related to safeguarding are communicated to the relevant staff to update guidance, training and processes.

### **Designated Safeguarding Lead (DSL)**

The University has one nominated DSL who is expected to:

- Provide operational oversight of safeguarding across NTU.
- Take a lead role in developing and reviewing NTU's approach to safeguarding.
- Take a lead role in developing and maintaining NTU's safeguarding risk register.
- Be an expert source of safeguarding knowledge and provide advice and support other roles, including the Deputy DSLs and Area Safeguarding Leads.
- Respond to safeguarding referrals and work in partnership with internal and external partners, including Local Authority, Police and NHS.
- Keep abreast of safeguarding policy changes and ensure changes are actioned and provide assurance to the USL.
- Provide termly safeguarding updates to the USL.
- Contribute to the annual safeguarding report.
- Maintain safeguarding records in line with guidance schedules and legislative/statutory requirements.
- Ensure DDSLs and Area Safeguarding Leads produce safeguarding guidance that is specific to their functional areas.
- Attend and contribute to NTU's Safeguarding Steering Group.
- Implement a rota to ensure a DSL or DDSL is always available.

### **Deputy Designated Safeguarding Lead (DDSL)**

The University has two DDSLs – one for Further Education; and one for the Institute of Education. They are expected to:

- Deputise for the DSL, as required.
- Ensure their areas are compliant with Ofsted requirements.
- Respond to safeguarding referrals within their areas, in conjunction with the DSL.

- Own the area safeguarding risk register which feeds into the organisational safeguarding risk register.
- Produce area specific safeguarding guidance which details the measures in place to safeguard children or adults at risk of harm in that area of the University.
- Attend NTU's Safeguarding Steering Group.
- Chair the local safeguarding working group.
- Keep abreast of safeguarding policy changes, communicating with the DSL and ensure changes are made to area guidance, processes and risk assessments.
- Be an expert source of safeguarding knowledge and provide advice and support other roles, including the Designated Safeguarding Officers.

### **Area Safeguarding Leads (ASL)**

ASLs are expected to:

- Support NTU's response to safeguarding referrals, as directed by the DSL.
- Own the area safeguarding risk register (or ensure safeguarding risks form part of an overall departmental risk register) which feeds NTU's safeguarding risk register.
- Produce local safeguarding guidance which details the specific measures in place to safeguard children or adults at risk of harm in that area of the University.
- Attend NTU's Safeguarding Steering Group.
- Where it is deemed that an area safeguarding working group is required, this role will chair that meeting.
- Keep abreast of safeguarding policy changes, communicating these with the DSL and ensuring relevant changes are made to area guidance, processes and risk assessments.
- Be an expert source of safeguarding knowledge and provide advice and support other roles, including the Area Safeguarding Officers.
- **HR ASL only:**
  - Ensure compliance with Safer Recruitment processes.
  - Co-ordinate Disclosure and Barring Service (DBS) checks for staff and maintain up to date records of completion and renewal dates.
  - Report DBS compliance into the annual safeguarding report.
  - Ensure training is assigned to staff on the e-learning platform (Thrive).
  - Ensure there is a procedure in place to respond and investigate safeguarding allegations towards NTU staff.
- **Employability ASL only:**
  - Maintain a register of placements that require DBS checks.
  - Liaise with placement providers to make suitable arrangements, including undertaking in-course DBS checks, where required.

### **Designated Safeguarding Officers (DSO)**

DSOs support the DSL, DDSLs or ASLs and are expected to:

- Provide advice and guidance to students and staff about safeguarding concerns.
- Help produce and update local safeguarding guidance, protocols, risk registers and risk assessments.
- Deputise in the absence of the DDSL or ASL, seeking guidance from the DSL as needed.
- Keep abreast of safeguarding policy changes, communicating with the DDSL or ASL to ensure relevant changes are made to guidance, processes and risk assessments.

- Produce risk assessments and support plans to safeguard students.
- Attend safeguarding working groups, as required.
- Ensure all safeguarding information is accurately recorded and stored in line with statutory guidance, as directed by the DSL, DDSL or ASL.

### **Training requirements**

The GSL, USL, SSL, DSL, DDSL, ASL, DSO complete **enhanced safeguarding training** and **Prevent essential learning** upon commencement of their role and every two years thereafter.

## Appendix B: Definitions

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**Child** – Refers anyone under the age of 18 years (up to their 18th birthday).

**Adult at risk of harm** – Someone who is 18 years of age or over who has:

- needs for care and support; and
- is experiencing, or is at risk of, neglect, or physical, mental or emotional harm; and
- as a result of those needs is unable to protect themselves against neglect or harm, or the risk of it. ([The Care Act 2014](#))

**Vulnerable groups** – A collective term used in this policy to describe children and adults at risk of harm, as defined above.

**Safeguarding** – The process of protecting vulnerable people from crime and other forms of abuse.

**NTU Staff** – Those who have a contract of employment with NTU (including full-time, part-time, permanent and temporary) and workers who are engaged on a casual or irregular basis (including hourly paid lecturers, guest speakers, invigilators, external examiners, sports coaches etc.).

**Student** – All learners registered on a course at NTU (including undergraduates, postgraduates, apprentices, those on short courses, distance learners).

**Contractor** – Those employed by third party organisations (including Unitemps) to carry out work on behalf of NTU.

**Volunteer** – Those engaged in activities within NTU or on behalf of NTU for a community organisation or school, on an unpaid basis.

**Visitor** – Those who are attending NTU premises for university-related activities, excluding the roles noted above (including open days, sports activities, libraries).

**University premises** – All buildings and land owned or operated by the University.

**Further Education (FE)** – Level 2 and 3 qualifications, based at Brackenhurst campus usually undertaken by students under 18. Confetti also have FE provision and have a separate [Safeguarding Policy](#).

**Apprenticeship** – An apprenticeship is a job with an accompanying development programme whereby apprentices gain the technical knowledge, practical experience and wider skills.

**Apprentice** – A learner who is employed in a job with an accompanying development programme which combines learning in the workplace with formal off-the-job training provided by the University.

**Employers of Apprentices** – Where apprentices are employed and undertake their workplace training.

**Ofsted** – The Office for Standards in Education, Children's Services and Skills inspect services providing education and skills for learners of all ages.

**Abuse** – Information about the types of abuse (including physical, emotional, sexual, neglect, and other forms of abuse) is in the [Safeguarding children, young people and adults at risk of harm guidance](#).

**Prevent** – Refers to *The Prevent Strategy*, introduced in 2015, forming part of the Government's counter-terrorism strategy. Prevent aims to safeguard people from becoming terrorists or supporting terrorism.

**Terrorism** – An action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

**Extremism** –The promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: 1. Negate or destroy the fundamental rights and freedoms of others; or 2. Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or 3. Intentionally create a permissive environment for others to achieve the results in (1) or (2).

**Radicalisation** – Refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

## Appendix C: Linked policies and procedures

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The following NTU policies and guidance should be considered alongside this policy:

- [Data Protection Policy](#)
- [Dignity and Respect Policy](#)
- [Disciplinary \(staff\) – colleague information](#)
- [Disclosure and Barring Service \(DBS\) Checks Colleague Information](#)
- [Domestic abuse support – colleague information](#)
- [Equality, Diversity and Inclusion Policy](#)
- [Further Education Safeguarding Policy \(Brackenhurst\)](#)
- [Grievance \(staff\) – colleague Information](#)
- [Health and Safety Policy](#)
- [Prevent Information](#)
- [Quality Handbook Section 13: Admissions](#)
- [Risk Assessment Form](#)
- [Report + Support](#)
- [Research – Code of Practice](#)
- [Safer Recruitment \(employment of ex-offenders\)](#)
- [Staff and Student personal relationships Policy](#)
- [Staff Volunteering and Community Engagement Policy](#)
- [Students Causing Serious Concern Protocol](#)
- [Student Code of Behaviour](#)
- [Student Placements](#)
- [Support to Study Policy](#)
- [Under 18 applicants' guidance](#)
- [Whistle-blowing \(public interest disclosure\) Policy](#)

## Appendix D: Regulatory Framework

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This policy is aligned to the following legislation and guidance:

[Care Act 2014](#) Defines an 'adult at risk of harm' to ensure the wellbeing of adults in need of care and support services.

[Children Act 1989 \(amended 2004\)](#) Places legislative requirements on local authorities and others to safeguarding and promote the welfare of children.

[Counter-Terrorism and Security Act](#) a duty on specified authorities to have due regard to the need to prevent people from being drawn into terrorism (known as the Prevent duty).

[Disclosure and Barring Information \(DBS\)](#) Disclosure and Barring Service (DBS) supports safer recruitment practices.

[Health and Safety at Work Act 1974](#) for employers to protect the 'health, safety and welfare' at work of all their employees, and those using the premises.

[Keeping children safe in education 2024](#) out the legal duties schools and colleges must follow to safeguard and promote the welfare of children.

[Nottingham and Nottinghamshire Interagency Safeguarding Children Procedures](#) for safeguarding children.

[Nottingham and Nottinghamshire Multi-agency Adult Safeguarding Procedure](#) sets out the procedure for all organisations to follow when they have a concern that an adult at risk is at risk of abuse or neglect.

[Safeguarding Vulnerable Groups Act 2006](#) (amended by the Protection of Freedoms Act 2012) – Prevents people who are deemed unsuitable to work with children and vulnerable adults from gaining access to them through their work.

[Sexual Offences Act 2003](#) relating to sexual offences, including child sex offences and those involving abusing a position of trust towards a child.

[The Human Rights Act 2018](#) Sets out the fundamental rights and freedoms that everyone in the UK is entitled to.

[Working together to Safeguard Children 2023](#) Statutory guidance which outlines how practitioners working with children, young people and families should work together to ensure that children are safe from harm.