National Youth Agency

Keeping Young People in Sight:

Designated Safeguarding Leads in the Youth sector

Acknowledgements

This paper builds on a series of reports published by the National Youth Agency (NYA) on young people's known and emerging needs through COVID-19 and beyond.

It draws on the collective insight of the Designated Safeguarding Leads across the youth sector; primarily drawn from the nearly 300 members of the National Safeguarding Youth Forum. Through its various meetings, members fed back on the research's focus, shared their experiences, and helped to feedback on emerging findings.

With special thanks to Tom Burke who conducted the research and authored the report and Clair Cooke, freelance safeguarding consultant, who supported the collection of views from National Safeguarding Youth Forum members; and all who took part in the survey, interviews and workshops.

We would like to acknowledge the time and expertise of the National Safeguarding Youth Forum, UK Youth, NSPCC and London Youth.

A wide range of information was collected for this report, not all of which is presented here.

'Keeping Young People in Sight: Designated Safeguarding Leads in the Youth Sector' has been funded by the Department for Digital, Culture, Media and Sport (DCMS), the National Lottery Community Fund and Youth Futures Foundation.

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1. Forewords

UK Youth welcomes the publication of this report and agree with the highlighted nine areas of focus to support improving high quality safeguarding, to keep young people safe. We also acknowledge the importance of the role 'Designated Safeguarding Leads' fulfil in managing safeguarding within an organisation to keep young people safe.

We would emphasise Designated Safeguarding Leads are dealing with the evolving changes young people experience in their contextual environments and are therefore an important link to staff and young people to ensure the provision of a safe environment for youth work and outdoor learning provision, and more holistically other youth sectors opportunities. We fully endorse a need for the safeguarding regulatory environment to be harmonised and the professionalisation of Designated Safeguarding Leads, as our view is, this would support a benchmarked standardised level of safeguarding across all sector settings involving young people.

David Watts, Designated Safeguarding Lead, Director of Outdoor Learning | UK Youth

The National Safeguarding Youth Forum (NSYF) in partnership with the NYA commissioned this piece of research because we felt so little was known about the important role of the DSL within the Youth Sector. Thank you to everyone for making this happen against a backdrop of Covid.

What makes this report really important is that, for the first time, some may say, it has managed to 'capture' the breadth and depth of the role, the responsibilities and the diversity of delivery approaches. It also identifies the complexity of the legislation and guidance DSLs have to navigate and amplifies inconsistencies and areas that need further guidance to reflect the interconnectedness of young people's lives. We endorse the highlighted nine areas of focus and will be working with key partners to take these forward over the coming year.

Isabelle King, Chair of National Council for Voluntary Services (NCVYS)

Through NYA's work within the youth sector and engagement with organisations including the National Youth Safeguarding Forum and the NSPCC, it became clear that the challenges facing Designated Safeguarding Leads (DSLs) needs to be addressed. The NYA in collaboration with the National Youth Safeguarding Forum, the NSPCC, UK Youth and London Youth commissioned research into the role of Designated Safeguarding Leads within a youth work setting. The research has underpinned this timely report which shines a light on the diverse challenges experienced by DSL practitioners who lead on safeguarding in youth sector organisations. Findings from the report show that the role of a DSL is vast, complex and continually evolving, with the profile of those they safeguard rapidly changing, however the support available to DSLs is astonishingly low.

Safeguarding young people and vulnerable adults is the most important duty of any youth worker, therefore it is imperative that the support, training and governance DSLs receive is improved, which in turn will enable youth workers to ensure the provision of a safe environment for young people. NYA's Safeguarding and Risk Management Hub provides targeted support for DSLs, but we call on others to play their part. We call on statutory bodies to support, engage and involve youth sector organisations in local safeguarding partnerships, recognising the value youth sector partners can bring to transform the lives of young people.

Abbee McLatchie, Director of Youth Work National Youth Agency

2. Executive Summary

The widening role of a Designated Safeguarding Lead (DSL) has become more complex and challenging than ever before. The purpose of this introductory study is to capture, analyse and platform the experiences of Designated Safeguarding Leads (DSLs) across a number of voluntary and statutory youth organisations in England, largely before the Covid-19 pandemic.

This report reviews the professional background of 1,300 NSPCC training attendees, captures the experience of 300 DSLs from the National Safeguarding Youth Forum (NSYF) and summarises legal and policy reports related to emergent themes from these DSLs. The areas of discovery explored in this report include; the changing nature of the DSL role; a profile of DSLs in the youth sector, organisational approaches to safeguarding, the safeguarding concerns DSLs are responding to and their work alongside statutory services, training and support for DSLs and the impacts of the Covid-19 pandemic.

The Changing Nature of the DSL Role

The DSL role continues to evolve, resulting in ever-growing expectations, responsibilities and knowledge required to fulfil the role effectively. This includes taking a more strategic approach to preventing harm, responding to; varied online harms, a rise in poor mental health and increased disclosures of non-recent abuse, preventing radicalisation and managing the risks associated with an increasing numbers of known offenders.

Also, the breadth of whom DSLs safeguard has increased to include staff and volunteers as well as an increasingly diverse youth population in areas such as sexual orientation, gender identity and ethnicity. This diversity can result in additional vulnerabilities and barriers to accessing support resulting in some DSLs exploring how intersectionality and systemic approaches inform safeguarding practice.

The expansive nature of the DSL role is in part due to a divided, changing and growing legal and regulatory framework. This includes expectations and powers of regulatory bodies such as the charities commission, evolved and devolved responsibilities of local safeguarding frameworks in statutory organisations, information sharing and data protection requirements and an increase in criminal acts that impact on the eligibility of workers.

Profile of DSLs in the Youth Sector

Of the 1,300 NSPCC training attendees around 45% of attendees were in charitable and not for profit organisations with a third working in statutory organisations. Responses to our survey suggest that DSLs in youth organisations are primarily middle aged, white, Christian, heterosexual women. Many come from professional family backgrounds and are well educated, holding an undergraduate degree or higher. Most have been specifically involved in safeguarding for several years. The most common professional background was in youth work, followed by children's social care. Whilst this was a relatively small sample size, it does reflect the workforce across other areas of youth support including social work.

Almost a third of the participants work in a distinct safeguarding role but for most it's just one part of their wider responsibilities. The report highlighted some ambiguity around whether DSLs are predominantly front line workers and middle managers, or senior managers. However the average salary of £35,000-£40,000, which is the same whether for someone in an exclusive safeguarding role or not, suggests middle management. Most DSLs work in a programme delivery function, are line managers and have spent over three years at their organisation, a third for more than nine years

When carrying out their role DSLs reported most frequently providing advice and support to colleagues, followed by managing concerns, allegations or incidents and developing their organisations safeguarding approach, which may be a reason for such positive views of the organisations approach outlined below. Whilst many DSLs perceive significant differences between the roles in different organisations the data doesn't support this perspective.

The majority of DSLs agreed that they are perceived as an authority in their area of expertise. However, a third do not feel respected and only half of DSLs believe their role has attractive career prospects. This was attributed to a lack of clear progression, limitations on the pay or reward for their role and an underestimation in the range of skill needed to be successful.

Organisational Approaches to Safeguarding

Achieving effective and compliant safeguarding requires organisations to adopt a whole organisational approach, which a DSL may lead or be part of. The DSLs that took part in this survey felt positive about their organisation's approach and how seriously safeguarding was taken, confirming up to date policies and procedures that are effective at keeping people safe from harm. Two areas that seemed less comprehensive were risk and risk management, and compliance with the DBS Code of Practice demonstrated by only half having a policy on the recruitment of those with a criminal record.

DSLs reported feeling well supported by staff and team members, although a fifth were not aware of a senior safeguarding lead at board level and highlights a significant communication gap in the governance structure. The one significant barrier respondents identified to effective safeguarding was a lack of funding.

Responding to Concerns and Engaging with Statutory Services

In the 12 months preceding this survey, DSLs most commonly responded to and reported concerns about a child, followed by concerns about young people. Rarely did DSLs make referrals for adults at risk, staff or volunteers. However, the majority of DSLs had received concerns about the behaviour of volunteers and staff.

Whilst children's social care and the Disclosure and Barring Services (DBS) were the most commonly engaged statutory services, many reported experiencing significant barriers to making a referral. This was often attributed to how seriously the youth sector was taken and could, along with safeguarding practices, vary significantly for organisations that work across multiple local authority areas. It's therefore not surprising that contact with local multi agency statutory safeguarding arrangements varies significantly with the overwhelming majority of DSLs very rarely, if ever, being engaged as part of a multi-agency team.

Training and Support

Most DSLs had received some form of safeguarding training, most of which was delivered by national charities or local authorities - very few from a youth work organisation. Just over half have accredited safeguarding qualifications at level 2 (equivalent to a GCSE) or above, with a remaining significant proportion (46%) having no qualification or verified training. Interviews with DSLs highlighted the significant variety of training available and whilst most DSLs who attended training felt it was relevant,they also reported it to be basic and assumed most training was the same. Very few had training related to safeguarding adults

Ongoing support or supervision for DSLs was low and inconsistent, with only about half feeling as though they received the frequency of job based supervision support they needed and only a quarter having reflective supervision for their safeguarding practice. In an attempt to seek additional support, the majority of the DSLs responding joined informal peer safeguarding support groups.

54% hold acccredited safeguarding qualifications at level 2 or above

Only around half of DSL's feel they receive the job-based supervision support needed

The Impacts of the Covid-19 Pandemic on DSLs

The number of referrals during the pandemic either dropped or stayed the same, most likely due to decreased contact with young people during this time. However, the impact of Covid-19 has led to increased welfare concerns about children, specifically mental health or familial, and increased challenges to support staff and volunteers with the new challenges of working remotely.

The report concludes that as the lynchpin of effective safeguarding practice and systems, DSLs must have the right support and that a more tailored training, support and developmental approach should be taken in response to an organisation's size. In addition, whilst there are a rising number of young people needing support, many youth sector organisations face barriers to accessing effective statutory support, resulting in managing higher numbers or welfare concerns alone - often without the skill, knowledge or resources.

This report is intended to set the scene for a broader agenda of research leading to policy developments that better protect children and adults from harm. As such this paper lays out options across nine areas to focus on improving how practitioners keep young people safe from harm, abuse and exploitation. They are:

1. A wider regulatory environment that is harmonised, simplified and comprehensive.
2. Reviewing the wider DSL role to define clear responsibilities and expectations.
3. Supporting statutory agencies to work with DSLs and fulfil their responsibilities.
4. Further embedding equity, diversity & inclusion into the work of DSLs, both within the workforce and in response to the more diverse needs of children, young people and adults at risk.
5. Developing a competency and training framework for a standardised level of knowledge, skill and competence.
6. Move towards a DSL professional development pathway - whether voluntary or paid.
7. Providing DSLs with the tools, guidance and support to be effective.
8. Empowering young people to influence and direct efforts to keep them safe from harm
9. Building the evidence base of effective safeguarding.

3. Introduction

The purpose of this introductory study is to capture, analyse and platform the experiences of Designated Safeguarding Leads (DSLs) across voluntary and statutory youth organisations. The champions of safeguarding within their organisations and the lead individual when referring to statutory protection services the DSLs role has undergone a significant evolution. This report aims to establish how policy, societal and practice changes has impacted on the DSL role. The report explores the complexities of the role and the support mechanisms and infrastructure available to DSLs that are designed to help them safeguard effectively.

> *"As a DSL I feel like I'm constantly pushing back or fighting or driving. You know, and maybe that's part of what I enjoy about the role, but it does really take its toll as well. I just think if I could get people to buy into safeguarding and understand the value of it for their programmes for the organisation, and perhaps I wouldn't have to be driving and fighting as much."*

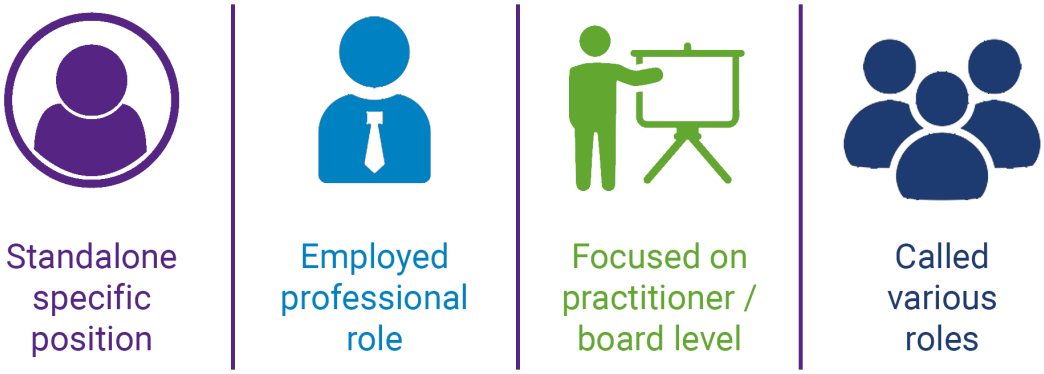
A priority for practitioners from a wide range of disciplines, policy makers and decision makers is to ensure young people are kept safe from harm. Whilst the Covid 19 pandemic has brought into sharp focus the risks that young people face; it has also highlighted the unique role of trusted adults who support and work with young people. Youth workers and allied practitioners play a key role in supporting the holistic development of young people.

The youth sector workforce is very broad and challenging to encapsulate, it consists of volunteers, part-time and full-time workers. These individuals have a range of qualifications and experiences, including many with the professional qualification in youth work.

The purpose of this introductory study is to capture, analyse and platform the experiences of a particular segment of the youth sector workforce: Designated Safeguarding Leads (DSLs). Across voluntary and statutory youth organisations, there has been a growth in DSL – broadly defined as practitioners who champion safeguarding within their organisations and lead referral to statutory protection services.

There is no nationally agreed definition of the role or its requirement. Depending on the size and scale of the organisation, the function varies. It can be:

- a standalone specific position to being one function of a broader role
- an employed professional or a voluntary role
- focussed on a practitioner level role or a Board level role (or both)
- called various titles, including a designated safeguarding lead/officer/practitioner or nominated child protection lead or Health, Safety & Safeguarding Role



Most will be working with young people aged 13-19. Many also work with those in late childhood and early adulthood up to 25 years-old; especially where the individual has a disability or need additional support. Some will be in organisations that work exclusively with young people; some will be in organisations with a wider remit but with significant youth provision. Whilst situated in the context of the Covid 19 pandemic, this introductory study takes a broad look at the work of DSLs before the pandemic hit and what lessons can be drawn from what will be different in the future.

This report aims to set the scene for a broader agenda of research and policy development activity. It aims to be a broad, initial overview of the work, role and status of Designated Safeguarding Leads in youth organisations active in England. It lays out recommendations for further areas of development to improve how practitioners keep young people safe from harm, abuse and exploitation.

This report has been undertaken by the National Youth Agency (NYA) as the professional, statutory and regulatory body (PSRB) for youth work in England. It has been developed through engagement with the National Safeguarding Youth Forum (NSYF) - a membership association of Designated Safeguarding Leads in voluntary youth organisations. Established in 2010, its purpose is to support and promote practitioners seeking to safeguard young people from harm, abuse, neglect and exploitation. It aims to achieve this by enabling:

- Support. Provide a safe space for members to come together to gain support from each other.
- Learning. Encourage informal networking to share information, good practice and learn from each other.
- Improvement. Improve standards of safeguarding in the youth sector, through the development of the workforce.

Methodology

The report draws on a range of primary data collected for the project. The research has been informed by the lived experience of DSLs active in the National Safeguarding Youth Forum (NSYF. Specific data collection which informed the report includes:

- **Practitioner dialogue workshops:** Three full-day Forum events and a series of smaller opt-in seminars led by individual agencies exploring specific topics. All were free and open access and hosted on Zoom or similar platforms, for DSLs to share, reflect and learn together from their experiences.
- **Survey of designated safeguarding leads:** a self-selecting survey of Designated Safeguarding Leads was conducted during September – October 2020. The survey was specifically targeted at those active in youth organisations and disseminated via the NYA and the NSYF and the networks of UK Youth and London Youth. In total 84 responses were received and analysed.
- **Interviews:** in-depth interviews were undertaken with twelve designated safeguarding leads. Due to this research's exploratory focus, semi-structured interviews were conducted to allow respondents to digress, expand, and share their unique perspectives. Each interviewee was provided with advance materials of boundaries of confidentiality, ethical conduct and the key themes to be explored. All interviews were recorded, transcribed and thematically analysed for key themes. Quotes are included but edited for readability; removing hesitation, repetition and pauses. To ensure greater candour, all interviews were confidential with no attribution.
- **Review of relevant legal and policy reports:** Based on the practitioners' key themes, an initial narrative review of legal and policy reports was conducted. With insight dialogue workshops and interviews and feedback from across children and youth organisations policy teams, key themes were explored and primarily presented in Section 4.
- **Analysis of NSPCC training attendees:** NSPCC shared anonymised data of attendees at its Designated Safeguarding Officer and Lead training from August 2015 – 2020. A small number of entries were disregarded due to incomplete information. Details of 1300 individuals who have attended training was analysed. Individual job titles were each manually coded to align with broader categories.

4. DSL role in law and statutory guidance

There has been a gradual evolution in law, regulation, or statutory guidance, requiring a range of bodies to have a 'Designated Safeguarding Lead' (DSL). Each provision frames the role in diverse ways and sometimes with different titles. Similarly, there are different levels of details about the role requirements.

Current statutory provisions for DSLs

- The Children Act 2004 places duties on a range of organisations to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children. [1]Organisations affected include all local authorities and district councils, NHS bodies including clinical commissioning groups and General Practitioners, Police forces and Police and Crime Commissioners, Probation Services and Community Rehabilitation Companies and much of secure estate.

- Statutory guidance accompanying the duty, Working Together to Safeguard Children, includes an expectation for each of these institutions to have:[2]
    - a senior board level lead with the required knowledge, skills and expertise or sufficiently qualified and experienced to take leadership responsibility for the organisation's/agency's safeguarding arrangements.
    - a designated practitioner for child safeguarding with sufficient time, funding, supervision and support to support other practitioners in their organisations to safeguard children. The role should always be explicitly defined in job descriptions.

- The Education Act 2002 puts a duty on local education authorities, maintained schools and further education institutions, including sixth-form colleges, to exercise their functions to safeguard and promote the welfare of children. The Act puts the same duty on independent schools (including academies, free schools and alternative provision academies) through the Independent Schools Standards.[3] Statutory guidance accompanying the duty, Keeping Children Safe in Education, includes an expectation for each institution to have a designated safeguarding lead. [4] The guidance gives detailed expectations on the role and the requirements. In December 2020 the Government launched a consultation to revise the guidance; including strengthening requirements around responding to specific needs and harms; providing support to staff; having a greater range of training, knowledge and skills, and understanding children's views. [5]

- Borders, Citizenship and Immigration Act 2009 places a duty on all immigration, asylum, nationality and customs functions to be discharged having regard to the need to safeguard and promote the welfare of children in the UK. [6] Statutory guidance has been issued to staff of the UK Visas and Immigration, Immigration Enforcement and the Border Force, which are part of the Home Office and contractors when carrying out UK Border Agency functions requiring each of these agencies to be clear who has overall responsibility for the agency's contribution to safeguarding and promoting the welfare of children and what the lines of accountability are from each staff member up through the organisation to the person

[1] Section 11, Children Act 2004
[2] HM Government (2018) Working Together to Safeguard Children pg 55)
[3] Section 175, Education Act 2002 See also: the Education (Independent School Standards) Regulations 2014, and the Non-Maintained Special Schools (England) Regulations 2015.
[4] Department for Education (2020) Keeping Children Safe in Education
[5]Depart for Education (2021) Keeping children safe in education 2021 Proposed statutory guidance for schools and colleges
[6] Section 55, Borders, Citizenship and Immigration Act 2009

with ultimate accountability for children's welfare. It should also be clear with whom each staff member should discuss, and to whom they should report, any concerns about a child's welfare. [7]

- Statutory guidance has been issued under the Forced Marriage (Civil Protection) Act 2007 to a range of public bodies including local authorities and NHS bodies. [8] This requires those agencies Chief Executives, directors and senior managers to ensure that their organisation has a 'lead person' for issues relating to forced marriage. [9]

- Statutory guidance has been issued under the Female Genital Mutilation Act 2003 to a similar range of public bodies. [10] This requires that heads of relevant organisations ensure that their organisation has a 'lead person' whose role includes responsibility for FGM (this will often be the designated safeguarding lead). This person should have relevant experience, expertise and knowledge. Their role should include ensuring that cases of FGM are handled, monitored and recorded properly. They must also ensure "there is a member of the organisation who has undertaken additional training and can be approached to discuss and direct difficult cases (this may be the 'lead person' mentioned above)".[11]

- The Charity Commission requires the approximate 185,000 registered charities in England and Wales to ensure that protecting people and safeguarding is a governance priority as a fundamental part of operating as a charity for the public benefit. The regulator's guidance requires all charities that work with children or adults at risk to appoint a safeguarding lead. The lead should work with their local authority safeguarding boards and/or create a plan for responding to concerns overseas. [12]

- The Counter-Terrorism and Security Act 2015 places a duty on certain bodies in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. [13] Statutory guidance issued under the Act places duties on a range of these bodies' leaders to meet the duties. For example, local authorities should have a local or regional 'Prevent co-ordinators' with access to senior local authority leadership to give advice and support. These roles should prepare relevant risk assessments and action plans. [14] Non statutory guidance on the duty for schools and childcare providers explicitly highlights the role of Designated Safeguarding Leads to undertakes Prevent awareness training, provide advice and support to other staff members on protecting children from the risk of radicalisation and manage concerns or referrals to Prevent leads.[15]

- Health providers have a system of designated and named professionals to lead safeguarding; these are "experts and strategic leaders for safeguarding" in their organisation. Providers should have a named nurse, named doctor, and named midwife for safeguarding children alongside a named lead for adult safeguarding and for issues relating to mental capacity. There is a wide range of specified duties for the roles and expectations of training and support. There must also be an executive lead for safeguarding children, adults at risk and Prevent. [16]

- Health and social care service providers are required by regulation to establish systems and processes that are operated effectively to prevent abuse of service users and to investigate any allegation or

[7] Home Office (2009) Statutory guidance to the UK Border Agency on making arrangements to safeguard and promote the welfare of children Issued under section 55 of the Borders, Citizenship and Immigration Act 2009
[8] Issued under Section 63Q, Family Law Act 1996 as amended by the Forced Marriage (Civil Protection) Act 2007
[9] HM Government (2014) The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage
[10] Issued under Section 5c, Female Genital Mutilation Act 2003 as amended by the Serious Crime Act 2015
[11] HM Government (2020) Multi-agency statutory guidance on female genital mutilation
[12] Charity Commission (2019) Safeguarding and protecting people for charities and trustees
[13] Section 26, Counter-Terrorism and Security Act 2015
[14] HM Government (2019) Revised Prevent duty guidance: for England and Wales
[15] Department for Education (2015) The Prevent duty Departmental advice for schools and childcare providers
[16] For an overview, see: NHS England and NHS Improvement (2019) Safeguarding Children, Young People and Adults at Risk in the NHS: Safeguarding Accountability and Assurance Framework

evidence of such abuse.[17] Whilst accompanying guidance from the Care Quality Commission on meeting the duty does not specifically mention a named lead, the framework of regulation is based upon a 'Registered Manager' ensuring implementation of the standards. [18]

- Canon Law of the Church of England requires each diocese's bishop to appoint a 'diocesan safeguarding advisor' to advise the bishop on matters relating to the safeguarding of children and vulnerable adults.[19] The functions of the role are set out in regulations and advising on all safeguarding matters, supporting survivors and providing or coordinating training. They should receive appropriate professional supervision and have sufficient time for continuing professional development. [20] In October 2020, the Independent Inquiry into Child Sexual Abuse recommended that the role is replaced by 'Diocesan Safeguarding Officers'. The new position should have the authority to make decisions independently of the diocesan bishop in respect of key safeguarding tasks. Whilst continuing to be employed locally, they should be professionally supervised, and quality assured by the Church of England central National Safeguarding Team. [21] The recommendations were agreed in full by the Church of England national governing bodies[22]and Synod in November 2020. [23]

- In 2018, the Department for International Development (now the Foreign, Commonwealth and Development Office) issued enhanced safeguarding due diligence for any organisation it decides to directly fund. Since 2018 organisations working with children and vulnerable people, must have a range of requirements including having Designated Safeguarding Officer who reports regularly to the senior leadership and Board. [24] In 2020, additional requirements on child safeguarding were introduced to all programmes that involve children both directly and indirectly. This requires any the organisation to designate key people at different levels (including senior level) as "focal points" with defined responsibilities to champion, support and communicate on child safeguarding and for effective operation of the child safeguarding policy. [25]

Alongside the core requirements for a DSL, the role is often aligned to other parallel and connected statutory provisions. These include requirements for roles relating to:

- Data protection: the General Data Protection Regulation (GDPR) requires certain organisations to appoint a Data Protection Officer. Whilst few youth organisations may meet this legal requirement, they can appoint a DPO if they wish and where they do the same requirements of the position and tasks apply had the appointment been mandatory. There is a statutory definition of their role, including tasks to inform others about data protection, to monitor legal compliance and lead engagement with relevant statutory agencies. [26]

- Health and Safety: Most employers must have a "competent person" who has had sufficient training and experience or knowledge and other qualities to enable them to assist them in meeting their health and safety obligations. Regulations require that the individual has adequate time and means to fulfil the tasks in light of the organisation's risks and that it is preferable to have an employed competent person over an external adviser or consultant. [27]

[17] Section 13, The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
[18]See: CQC https://www.cqc.org.uk/guidance-providers/regulations-enforcement/regulation-13-safeguarding-service-users-abuse-improper#guidance
[19]Canons of the Church of England C30
[20]Diocesan Safeguarding Advisors Regulations 2016
[21] The Independent Inquiry into Child Sexual Abuse (2020) The Anglican Church Investigation Report
[22] General Synod (2020) GS 2184: Response to the Independent Inquiry into Child Sexual Abuse's Final Investigation Report into the Anglican Church
[23] Church of England (25th Nov 2020) Press release: Unanimous Synod support for IICSA report
[24] DFID (2018) Enhanced Due Diligence: Safeguarding for external partners
[25] DFID (2020) Child Safeguarding Due Diligence: for external partners
[26] Articles 37–39, General Data Protection Regulation (GDPR)
[27]Regulation 7, The Management of Health and Safety at Work Regulations 1999

Current provisions for DSLs in guidance to the youth sector

Wider duties on providing services for young people include requirements about ensuring safe environments:

- Since 2006, local authorities have had a duty, so far as is reasonably practicable, to promote the well-being of persons aged 13 – 19 (and of persons aged up to 25 with learning difficulties) by securing access for them to sufficient educational and recreational leisure-time activities and facilities.[28] Current statutory guidance states that such provision should be through "safe environments" which improve their "physical and mental health and emotional well-being" and enable them to make informed decisions about risky behaviours. [29] A consultation on revising the guidance completed in December 2019 but the response has not been published at the time of this report. [30]

- In October 2020, the Department for Education published non-statutory guidance for providers running out-of-school settings: Keeping Children Safe during Community Activities, After-School Clubs and Tuition. This encouraged providers to appoint a DSL who has undertaken safeguarding and child protection training. It states that DSLs should be suitably trained and have a good understanding of specific safeguarding issues (including bullying, physical abuse, sexual harassment and sexual violence, sexting, hazing, online safety, substance abuse and extremism and radicalisation), child protection, what abuse and neglect look like, referral processes into the local authority children's social care team and what to expect when a referral is made to children's social care. [31]

- The National Curriculum for Youth Work is published by the National Youth Agency (NYA) to build greater understanding of youth work practice, provide an educational framework and act as a reference tool for decision makers, policy makers, commissioners, youth workers and young people. It highlights youth work values and principles including that “Good youth work is underpinned by contextual safeguarding approaches, where the welfare of young people is paramount”. [32]

DSLs, DBS checks and position of trust

There are specific legal provisions to ensure that individuals working with children and adults at risk to ensure are safe and suitable to do so. However, many DSLs are not currently covered by these provisions.

- Level of disclosure and barring checks: Employers and voluntary organisations are only entitled to request an enhanced check for regulated activity where the position meets specific definitions of regulated activity. DSLs may not meet the requirements as they do not work in specified establishments; do not have the frequency of contact with children or be the line manager of those who do. This could lead to the following scenario:
    - *A voluntary youth organisation appoints its Director of Operations as it’s DSL. They normally have limited direct contact with children and therefore would not have the highest level of disclosure and barring checks. They are likely to be proactively informed by the rest of the organisation of highly vulnerable children, including contact details and potentially direct contact with them when responding to a serious safeguarding concern.*

- Position of Trust: currently there is an offence for individuals to engage in sexual activity with a 16 and 17 year-olds where the child has some dependency on the adult involved, often combined with an element of vulnerability of the child. Existing positions of trust include those providing care for a child in a residential

[28] Section 507B, Education Act 1996 (as amended by S.6 Education and Inspections Act 2006)
[29] Department for Education (2012) Statutory Guidance for Local Authorities on Services and Activities to Improve Young People’s Well-being
[30] Department for Digital, Culture, Media & Sport (2019) Call for evidence: statutory guidance for Local Authorities on providing youth services
[31] Department for Education (2020) Non-statutory guidance for providers running out-of-school settings: Keeping Children Safe during Community Activities, After-School Clubs and Tuition
[32] National Youth Agency (2020) National Curriculum for Youth Work

care home, hospital or educational institution. [33] Following campaigning by NSPCC and others, the Government intends to extend the role to adults in sports and religious organisations working with 16 and 17 year-olds. [34]However, currently, many DSLs in voluntary youth organisations would not be covered by the legislation, which could lead to the following scenario:

- *A voluntary organisation appoints its Director of Operations as it's DSL. They become aware of a 16 year-old who has experienced sexual abuse. Over time, they enter a sexual relationship with the individual. Although this individual would be dismissed there would be no legal basis for prosecution.*

Current leadership for keeping young people safe from harm

The Government's responsibility for keeping young people safe from harm is currently split across several Government departments; reflecting both the split in legal frameworks for children and adults and differing policy drivers and initiatives. The move from familial dependence to evolving capacity for independent decision making and autonomy yet with continued need for support sees young people potentially coming into contact with a range of harms; with each having responses led by different Government departments.

Summary of Governmental responsibilities for safeguarding young people		
Department	**Minister**	**Responsibilities**
Department for Education	Parliamentary Under Secretary of State (Minister for Children and Families)[35]	Children's social care including child protection, children and young people's mental health, online safety and preventing bullying in schools, policy to protect against serious violence
Home Office	Parliamentary Under Secretary of State (Minister for Safeguarding)[36]	DBS, child sexual abuse and exploitation, domestic abuse, sexual violence, early youth intervention on serious violence, online internet safety, safeguarding and DBS checks for COVID volunteers and community groups
Home Office	Minister of State (Minister for Security)[37]	Counter terrorism – prepare, prevent, pursue, protect, Online harms
Department for Digital, Culture, Media & Sport	Parliamentary Secretary (Minister for Civil Society)[38]	Youth policy
Department for Digital, Culture, Media & Sport	Minister of State (Minister for Digital and Culture)[39]	Online Harms and Security
Department of Health and Social Care	Minister of State (Minister for Care)[40]	Adult social care
Ministry of Justice	Parliamentary Under Secretary of State [41]	Public protection, extremism, Offender rehabilitation and release, Youth Justice, Mental capacity and the Office of the Public Guardian

[33] Section 16 – 19, Sexual Offences Act 2003
[34] Forthcoming Police, Crime, Sentencing and Courts Bill 2021. For details see: Home Office (2021) Police, Crime, Sentencing and Courts Bill 2021: positions of trust factsheet
[35] https://www.gov.uk/government/ministers/parliamentary-under-secretary-of-state-children-and-young-families
[36] https://www.gov.uk/government/ministers/parliamentary-under-secretary-of-state--62
[37] https://www.gov.uk/government/ministers/minister-of-state--88
[38] https://www.gov.uk/government/ministers/parliamentary-under-secretary-of-state--68
[39] https://www.gov.uk/government/ministers/minister-of-state-for-digital-and-culture
[40] https://www.gov.uk/government/ministers/minister-of-state--60
[41] https://www.gov.uk/government/ministers/parliamentary-under-secretary-of-state--135

These responsibilities are not exhaustive. For youth organisations with particular areas of deliver focus they can be affected by the specific policy initiatives. For example, many youth organisations working with asylum seekers and refugees will be as heavily affected by Home Office policy making or youth sports organisations by the agenda of DCMS.

5. The changing nature of the DSL role

The past decade has seen significant changes in youth organisations' work seeking to keep young people safe from harm. Before the pandemic hit, DSLs faced an ever-increasing landscape of expectations. Through the dialogue workshops and interviews with DSLs, whilst conducting this research, a wide variety of issues have been highlighted showing how the role has continually evolved and become increasingly complex.

Changing expectations of the DSL role

DSL role has moved from 'responding well' to proactively and strategically preventing harm
DSLs reported that traditionally DSL-style roles would have been the key internal reporting route for child protection concerns. Its focus was reacting and responding to abuse. Overtime, the role has evolved to take a lead on all aspects of preventing harm and leading responses to concerns of harm. This includes involvement in developing and implementing safer recruitment guidelines (with a greater understanding of good employment practices); decision making on risks related to criminal histories including through statements on DBS checks; co-ordinating or delivering training; quality assurance and auditing of practice and leading effective internal investigations into allegations against a team member.

Many DSLs noted how this has stretched the role to have increasing involvement in broader strategic planning and contact with trustees and Board members. Whilst experience varies significantly by size and scale of organisation, many believed that the role is increasingly expected to contribute towards consideration of organisational wide risks.

Increased expectations to be knowledgeable of different forms of harm
For some, the role – where it existed – was seen as being focussed on how youth organisations responded to child abuse and neglect, particularly experienced in families. However, as more survivors of abuse have been heard and awareness of harm experienced has increased; many reported shifts to a much wider and holistic understanding of harm experienced by young people. Today's safeguarding leads will be expected to be knowledgeable of, and support others to respond to, a wider range of issues. Examples raised include peer-on-peer abuse, criminal and sexual exploitation, Adolescent to Parent Violence and Abuse, harmful sexual behaviour, spiritual abuse amongst others. This shift can be seen in changes to statutory guidance overtime and sits alongside understanding harm committed online (see below).

Existing concepts have, rightly, broadened for DSLs. For example, whilst traditionally a DSL may have known or acted on concerns about domestic violence; today they recognise a broader range of domestic abuse and intimate partner violence that encapsulates both violent acts and coercive controlling behaviour, economic abuse, harassment and beyond.

Whilst DSLs will be exposed to differing levels of prevalence of these harms in the groups or communities they work with, most seek to be knowledgeable and have good awareness of different forms of harm. Some reported attending additional training courses, seeking support from DSLs' networks and/or keeping track of developments in the sector. This was seen as necessary to best undertake appropriate risk assessment of concerns and to be able to ensure effective onward referral.

…and knowledgeable of changing and emerging safeguarding concepts and language

Long standing DSLs noted that whilst the core of the work they undertake has remained the same – ensuring they protect people from harm – that there has been an evolution in the expectations of the language and concepts used in their work; for example, the shift in language from working with "vulnerable adults" to "adult at risk". [42] Concepts of what is safeguarding are socially constructed and evolve overtime with the influences of survivors, activists, and younger workers all challenging traditional concepts. For those in the youth sector they must maintain a good understanding of issues and changes relating to both children and adult at risk; and in touch with the developing language of the young people they work with.

Some DSLs noted how the role has evolved from awareness of specific forms of intentional harm and neglect to understanding how children and young people experience adversity and trauma and how this can have an enduring impact. [43] Many DSLs are looking to understand and respond to adverse childhood experiences ("ACEs") and building these frameworks into their practice. Likewise, some reported an increased awareness and understanding of contextual safeguarding – approach to understanding, and responding to, young people's experiences of significant harm beyond their families. [44] For some this has created an accessible framework to reflect the lived realities of issues many DSLs in youth organisations were working with. However, this welcome turn also created a need to better understand the concept, internalise, process, and communicate well to others.

For many DSLs they felt a professional pride to be 'up to date' with these concepts and use it to ensure that their organisation was drawing on the best available evidence of what worked. Likewise thought, without being knowledgeable and skilled they cannot undertake the role well; effectively engage in multi-agency responses to harm or have referrals accepted by statutory services.

Changing expectations of who DSLs are 'safeguarding'

Youth-centred but now safeguarding staff, volunteers and the wider public

As noted below, the regulation of safeguarding in charities has significantly evolved in 2017/18 with new guidance issued to charities of their duties. [45] A significant change is the Charity Commissions shift from a focus on children and those delivering regulated activities to duties to a much broader group: all beneficiaries, all staff, all volunteers, and others in contact with the charity.

Many DSL roles have therefore also flexed and evolved. They may receive reports of harm for a much wider range of groups of individuals. They may be involved in assessing risk and advising on mitigation of a wider range of project and programme design issues. They may be engaging with a wider range of statutory and non-statutory services for signposting and referral.

New duties and expectations to safeguard adults

Statutory protection systems for adults have developed several decades after those for children. Its roots come from concerns of familial elder abuse, institutionalisation and marginalisation of disabled people, a lack of personalised care and (increasingly) a more explicit commitment to empowerment as well as protection. [46] This journey has culminated in the Care Act 2014 which brought into statute explicit obligations on local

[42] See: Pritchard-Jones, L. (2018), ""Adults at risk": "vulnerability" by any other name?", The Journal of Adult Protection, Vol. 20 No. 1, pp. 47-58.
[43] See for example: Bush, M. (ed) (2018) Prioritising adversity and trauma-informed care for children and young people in England Young Minds / Health Education England
[44] See for example: Firmin, C. and Lloyd, J. (2020) Contextual Safeguarding A 2020 update on the operational, strategic and conceptual framework; Firmin C. (2020) Contextual safeguarding and child protection: Rewriting the rules London: Routledge
[45] Charity Commission (2018) Safeguarding and protecting people for charities and trustees; Hobson, J. (25th Oct 2019) There's no room for doubt around safeguarding: protecting people is too important
[46] For an overview, see: Chisnell, C. and Kelly, C. (2016) Safeguarding in social work practice: a lifespan approach

authorities to respond where an adult with care and support needs is experiencing or at risk of abuse or neglect and to their needs for care and support unable to protect themselves.[47]
For youth organisations this led to an increased recognition that their activity on safeguarding must be broader than traditional child protection frameworks and they need to have systems for referrals for young adults they engage directly. Likewise, it also has increased focus on adults in the lives of the young people they work with such as parents, siblings and grandparents. DSLs in youth organisations have become increasingly familiar with children and young people sharing concerns about adults at risk of harm or in acting on concerns about their own staff or, more commonly, volunteers.

Safeguarding across the life course: transitional safeguarding

The children's and adults' statutory safeguarding systems are conceptually and procedurally different, and underpinned by different legislative frameworks. A significant review of the systems by Research in Practice notes that neither systems are "specifically designed with adolescents' developmental needs or behaviours in mind, nor do existing approaches to safeguarding take into account evidence that the transition period for adopting adult social roles and responsibilities extends well into the twenties". [48]
For DSL in youth organisations, they are often at the sharp end of these different systems. Their work is across the life course and has responsibility for safeguarding intended beneficiaries, staff, volunteers, and others in contact with the organisation. They must be familiar with the different systems with their different underpinning concepts; different referral routes and navigating the 'cliff-edge' of support young people can receive as they age. Even basic language used is different – with even the concept of "safeguarding" different across the systems and with different categories of harm or different definitions used by statutory services across the life course (see table).

Defined forms of harm from statutory guidance for children and adults	
Working together to safeguard children statutory guidance	**Care and support statutory guidance (adults)**
Physical abuse	Physical abuse
Emotional abuse	Psychological abuse
Sexual abuse; including child sexual exploitation	Sexual abuse
Neglect	Financial or material abuse
Extremism	Modern slavery
Child criminal exploitation	Discriminatory abuse
	Organisational abuse
	Neglect and acts of omission
	Self-neglect
Domestic abuse*	Domestic abuse*
Note, this is a summary of forms of harm which are specifically defined in statutory guidance. There may be broader references to other forms of harm in the document. Its purpose is to illustrate the headline focus of the different frameworks and the ways youth organisations DSLs work across the two frameworks.	

[47] Section 42, Care Act 2014
[48] Holmes D &Smale E. (2018). Transitional safeguarding - adolescence to adulthood: Strategic Briefing Dartington: Research in Practice.

Safeguarding increasingly diverse youth population

Young people's identities are distinct from the wider population. There is a broad trend that younger people are from more ethnically diverse groups. The most recent census data (2011) showed that 20% of Under 18 year-olds were from non-White groups. [49] There is evidence that young people from Black and Minority Ethnic groups may face additional barriers to accessing help; for example when they experience sexual abuse. [50] Recent research from IICSA has shown how cultural stereotypes and racism can lead to failures on the part of institutions and professionals to identify and respond appropriately to child sexual abuse. [51]

Recent data from 2018 found that whilst 2.2% of the UK population identified themselves as lesbian, gay or bisexual; this rose to 4.4% amongst the 16-24 population who were the largest rate in any age group. This is likely to be an underestimate, as some respondents chose to respond "other" or "don't know" or did not give an answer. There is broad evidence that more individuals are "coming out" at an earlier age. [52]

The Government estimates that there are approximately 200,000-500,000 trans people in the UK.[53] There is poor data on the numbers and experience of Trans* young people. However, referrals to gender identity services have seen significant growth from 77 referrals in 2009-10 to 2590 in 2018-19. [54] There is also evidence that the age at which adolescents socially transition has decreased in the last decade.[55]

Whilst abuse, neglect and exploitation can occur to anyone; DSLs are often working with a population with barriers to accessing support and specific vulnerabilities from perpetrators. Prevalence of different forms of harm can vary by individual characteristics with many DSLs working with youth organisations specifically reaching minority groups working to ensure increased awareness of specific forms of harm. Similarly, the personal characteristics of the young person will affect the response by the DSL and the potential support needs. This can add layers of complexity to decisions making and the interaction of safeguarding advice and guidance offered to practitioners in the organisation. In response, some DSLs are increasingly exploring how intersectionality and systemic approaches can inform their safeguarding practice. [56]

[49] ONS (2018) – Ethnicity Facts and figures – British Population – Age Groups

[50] Chidlren's Commissioner (2015) Protecting children from harm: A critical assessment of child sexual abuse in the family network in England and priorities for action

[51] Rodger, H. Hurcombe, R. Redmond, T. and George, R. (2020) "People don't talk about it": Child sexual abuse in ethnic minority communities

[52] Stonewall research (2010) A poll for Stonewall of 1,500 people who were already out found that among the over-60s the average age they had come out was 37. But those in their 30s had come out at an average age of 21, and in the group aged 18 to 24 it was 17. Featured here: https://www.theguardian.com/world/2010/nov/15/gay-people-coming-out-younger-age

[53] GEO (2018) Trans people in the UK

[54] The Tavistock and Portman NHS Foundation Trust (2019) Referrals to the Gender Identity Development Service (GIDS) level off in 2018-19
See also: Butler, G. De Graaf, N. Wren, B. Carmichael, P. (2018) *Assessment and support of children and adolescents with gender dysphoria* *Archive of Disease in Childhood Vol 103 pp. 631–636*

[55] NHS Gender Identity Service (2018) *Evidence Base*

* The impact of domestic abuse, including controlling or coercive behaviour, has been integrated in the revised **Working together guidance – December 2020 update** guidance. Domestic abuse and controlling and coercive control have been added to the definitions (pp.110-111). The changes (p.14) state that practitioners need to develop their knowledge and skills in addressing the impact that domestic violence has upon children, both as witnesses and by being forced to collude in this.

[56] See for example the work of ListenUp! https://listenupresearch.org

Changing experiences of harm that DSLs respond to

Responding to increased disclosures of non-recent abuse

20.7% of the population aged 18 to 74 years in England and Wales have experienced abuse before the age of 16 years. This is equivalent to approximately 8.5 million adults.[57]

Whilst there are widescale experiences of abuse, survivors often struggle to be heard and face barriers to sharing their experiences.[58] The past decade has seen increased light shone on non-recent abuse. With high profile attention to Jimmy Savile and multiple police investigation, such as Operations Yewtree and Midland, survivors have increasingly stepped forward to share their experience. In part this has surfaced through formal processes – such as the Independent Inquiry into Child Sex Abuse Trust Project. [59] The increase in presenting has been described by police leaders probably the greatest challenge the police service has seen in the 21st Century other than terrorism. [60]

Sadly, evidence suggests that such abuse has taken place in many youth organisations. Operation Hydrant, a coordination hub of certain non-recent child sexual abuse investigations, tracks ever-rising number of police inquiries into non-recent abuse. Since its establishment in 2014 and up to December 2020, allegations on non-recent abuse have been reported in at least 435 children & young people's associations & clubs; 447 sports organisations and 545 religions institutions (amongst others). [61]

The 2015 to 2016 Crime Survey for England and Wales ran for the first time a module of questions asking adults whether they were abused as a child. The survey showed that approximately 5/6% of adults in England and Wales report abuse by an adult in position of trust or authority, including specifically from youth workers (details of differential rates from differing professions is not included). Rates are higher amongst men, especially in relation to sexual abuse.

Percentage of people aged 16-59 in England and Wales who experienced abuse by a person in position of trust or authority e.g. teacher, doctor, carer, youth worker before the age of 16, by sex, year ending March 2016. [62]

	Men (%)	Women (%)	All (%)
Psychological abuse	7	4	5
Physical abuse	7	3	5
Sexual assault by rape or penetration (including attempts)	15	4	6
Other sexual assault	13	5	6

DSLs are often heavily involved in responding to these investigations and liaison with police. Even where an organisation has not been engaged in a specific allegation, many DSLs have proactively reviewed historic activities and staffing and assessed whether previous ways of managing safeguarding concerns were sufficient. The statutory Independent Inquiry into Child Sex Abuse is currently gathering evidence from a range of national children and youth organisations.[63]

[57] ONS (2020) Child abuse in England and Wales: January 2020

[58] Eroga, M. (2018) 'Savile and Learning from the Inquiries' in Eroga, M. (ed.) Protecting children and adults from abuse after Savile What organizations and institutions need to do. London: Jessica Kingsley Publishers

[59] See: https://www.truthproject.org.uk/experiences-shared

[60] Simon Bailey Norfolk's chief constable and the then Association of Chief Police Officers (Acpo) lead on child protection. Quoted in: BBC News (28 July 2015) Norfolk Chief Constable: Child sex abuse 'challenge of century'

[61] National Police Chiefs Council (2020) Operation Hydrant Statistics - Breakdown of investigations up to and including 30 September 2020

[62] ONS (2016) Abuse during childhood: Findings from the Crime Survey for England and Wales, year ending March 2016

[63] See for example, the ongoing IICSA investigations of Child protection in religious organisations and settings (many of whom are charities) and Effective Leadership of Child Protection

Increasingly complex and varied online harms

As young people become ever more connected; they are using a wider range of technology, apps, social media platforms and games. Yet, most platforms have failed to integrate child safeguarding into their business models or their sites' design. As rapidly developing technology creates new opportunities to initiate, maintain and escalate abuse, young people are exposed to risks in the spaces where they socialise, learn and play.[64]

Recorded harm online – likely to be the tip of the iceberg – has been increasing. In the first two years since sexual communication with a child became an offence, 4,517 offences against adolescents aged 12 to 15 had been recorded by police forces in England, Wales and the British Transport Police. Similar trends are seen in the number of recorded obscene publication offences against 11- to 18-year-olds which quadrupled between 2014/15 and 2018/19. The National Crime Agency estimates that around 80,000 people in the UK that present some kind of sexual threat to children online.[65]

DSLs must keep on top of the range of technology that young people are using. They are developing policies and procedures for how the organisation uses these platforms and make judgments about safer ways of working. Many have had to gain new knowledge and understanding of the diversity of both technology, apps and platforms young people use and how those with an intent to cause harm may manipulate their use. For some, this has been a steep learning curve and continually refreshed given the ongoing changes to technology and platforms.

Respond to rising numbers of young people experiencing poor mental health

UK Government statistics show an increase over time in the prevalence of mental disorder in 5 to 15 year olds. [66] A recent NHS Digital survey found that one in six (16.0%) children aged 5 to 16 years were identified as having a probable mental disorder, increasing from one in nine (10.8%) in 2017.[67]

Many DSLs informally report that a considerable proportion of welfare concerns relate to young people or volunteers experiencing poor mental health or distress but unable to access appropriate support services. Whilst many will not meet threshold for crisis support; they remain known to the organisation and of concern to the DSL.

Safeguarding and preventing radicalisation and engagement in terrorism

As noted earlier, in 2015, a statutory duty, commonly known as The Prevent Duty, required a wide range of public bodies to have "due regard to the need to prevent people from being drawn into terrorism". [68] Statutory guidance details the expectations of how organisations should implement the duty; with parallel specific guidance for education institutions.[69] Statutory agencies have often delegated the duty onto charities and voluntary organisations supplying statutory services and/or through contracts or grant agreement requirements for non-statutory support. The duty is currently subject to a statutory independent review; due to report by August 2021. [70]

The framing of the duty by the Government has increasingly been through the prism of safeguarding. [71] Many DSLs have needed to respond to donors or contractual expectations for a prevent policy and/or demonstrate they can meet the duty. Many will have participated in – and then cascaded to peers –relevant training. For

[64]NSPCC (2019) How Safe are our children? 2019
[65]NSPCC (2020) How Safe are our children? 2020
[66] NHS Digital (2017) Mental Health of Children and Young People in England, 2017
[67] NHS Digital (2020) Mental Health of Children and Young People in England, 2020 Wave 1 follow up to the 2017 survey
[68]Section 26, Counter-Terrorism and Security Act 2015
[69] HM Government (2019) Revised Prevent duty guidance: for England and Wales
[70] For an overview of the Independent Review, see Home Office (2020) The Counter-Terrorism and Sentencing Bill –Independent Review of Prevent Factsheet
[71] For example, UK CONTEST Strategy for Countering Terrorism states that "the purpose of Prevent is at its heart to safeguard and support vulnerable people to stop them from becoming terrorists or supporting terrorism." HM Government (2018) UK CONTEST Strategy for Countering Terrorism.

some, they will have been involved in the Channel Panel system of developing effective interventions and support for those at risk of being engaged in terrorism.

Increasing numbers of known offenders who pose a risk to children and young people
Over the past decade there has been a 75% increase in offenders in England and Wales managed through Multi-Agency Public Protection Arrangements (MAPPA) - a set of statutory arrangements to assess and manage the risk posed by certain sexual and violent offenders. Most of these are registered sexual offenders.[72] The number of people who have been barred from working with children or adults has risen from approximately 54,500 in 2012 to 78,000 in 2020 – a 43% rise. [73]

Changing and growing legal and regulatory requirements

Significant change in regulation of charities approach to safeguarding…
In 2013 the Charity Commission published its first Safeguarding Strategy[74]and associated guidance for trustees. [75] Its focus was primarily on safeguarding children and adults who are in receipt of a regulated activity. In December 2017, the strategy was revised[76] with an Annex of trustees duties and, days later, an even wider statutory regulatory alert issued[77] in the context of concerns in charities working with veterans. [78] Following the Oxfam sexual misconduct scandal, the Annex was withdrawn and more substantive streamlined guidance was issued to charities in October 2018 as a definitive set of expectations. [79] The guidance was further revised in 2019 following consultations with charities. [80]

The shift from 2013 to the latest 2019 edition is stark. The Charity Commission has significantly expanded the expectations on organisations. From a focus on children and those delivering regulated activities, the Commission now expects duties to a much broader group: all beneficiaries as well as staff, volunteers and others in contact with the charity. Trustees must ensure no one who comes into contact with their charity suffers distress or harm. Policies must now be revised annually; issues of workplace bullying and harassment are included in the safeguarding ambit and much more detailed expectations of what minimum practice looks like. Charity lawyers have noted how the duties are described in more active terms than was previously the case, focusing on protecting rights and respecting children, adding a duty to take action to enable them to have the best outcomes.[81]

For many DSLs this has significantly changed their role increasing the scope of who they should be seeking to protect; leading to new annual revision of policies and significant new interest from trustees in safeguarding matters.

Even with this significant increase in regulation; sadly some charities have failed to act. During 2017/18 the Charity Commission wrote to 1,700 charities that said in their annual returns that they worked with children or adults at risk but also stated that they did not have a safeguarding policy urging them to address this.[82]Without a policy; it's unlikely they will have a safeguarding lead.

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[72] Ministry of Justice (2020) Multi-Agency Public Protection Arrangements-Annual Report 2019/20
[73] Figures derived from:
Disclosure and Barring Service (2019) Annual Report and Accounts For the period 1 April 2018 to 31 March 2019 and Disclosure and Barring Service (2019) Annual Report and Accounts For the period 1 April 2019 to 31 March 2020
[74]Charity Commission (2013) Strategy for dealing with safeguarding vulnerable groups including children issues in charities
[75]Charity Commission (2013) Charities: how to protect vulnerable groups including children
[76]Charity Commission (2017) Strategy for dealing with safeguarding issues in charities
[77]Charity Commission (2017) Regulatory alert to charities - safeguarding
[78]Charity Commission (2017) Regulatory alert for military charities
[79]Charity Commission (2018) Safeguarding and protecting people for charities and trustees; Hobson, J. (25th Oct 2019) There's no room for doubt around safeguarding: protecting people is too important
[80] Hobson, J. (25th Oct 2019) Updates to guidance about safeguarding and protecting people for charities and trustees
[81]Wherrett, A. (30 January 2018) Trustees Urged to Take Action on Safeguarding
[82]Charity Commission (2019) Dealing with wrongdoing and harm: lessons for trustees

… with new powers and increased action to enforce it...

This shift should be seen alongside a significant growth in the Charity's Commission powers. In 2016 the Commission gained new powers to issue (and publish if it wishes to) official warnings; strengthened power to investigate charities, and suspended charity trustees for misconduct or mismanagement. The Commission also gained new discretionary power to disqualify a person from acting as a trustee or in a senior management function in relation to a particular charity, a class of charity or all charities. [83]

The Charity Commission has increasingly used its powers. The number of official warnings has more than quadrupled from 6 to 26 between 2017/18 and 18/19 and the use of temporary protective powers nearly tripled between 2015/16 and 2018/19 from 22 to 62. [84] The number of active statutory inquiries has more than doubled between 2014/15 and 2017/18 from 135 to 305. [85] The regulator opened 552 new safeguarding cases in 2017/18 compared to 163 in 2015/16 – a 238% increase.[86]

Many DSLs, especially those in national charities, were acutely aware that the increased focus on safeguarding at the charity commission could lead to regulatory action. Their advice and their view on risk can significantly impact the charity if they "get it wrong".

… leading to increased reporting of safeguarding incidents to regulators

The recognition of the increased regulatory environment has contributed to a significant rise in serious incidents reported to the Charity Commission. In 2017/18, the Charity Commission received 1,580 incident reports about safeguarding. [87] In contrast, it reported 635 incident reports about 'abuse of vulnerable beneficiaries' in 2014/15.[88,89]

Limited information is published routinely about the nature of safeguarding returns. However, a one off taskforce following the Oxfam scandal looked at a sample of 1,228 safeguarding reports submitted to the Charity Commission between 1 February and 31 May 2018. This found that 11.3% came from charities working with younger people and 11.8% from those working in education/training. [90] A review of records from 2014-18 found that just 0.9% of registered charities submitted a report of a serious safeguarding incident to the Commission; raising significant concerns of continued under-reporting. [91] The Commission considers charities that do not report them as higher risk than those who do.[92]

Even given concerns of underreporting, many DSLs noted the expectations for reporting serious incidents. They have needed to become familiar with revised guidance on what and how to report[93]; changes to how reports are submitted[94] and new expectations on how to report concerns in a partner organisation.[95] Many noted that the internal decision-making as to whether to report or not and, if so, what to include in the report was as significant (if not more) than the act of completing the report itself.

Evolving and changing local child safeguarding frameworks

Local Safeguarding Children's Boards (LSCBs) have been abolished and new Local Safeguarding Arrangements introduced. Previous statutory duties on LSCBs to communicate the need to safeguard and promote the welfare of children, raise their awareness of how this can best be done, and encouraging them to

[83] The Charities (Protection and Social Investment) Act 2016
[84] DCMS (2020) Charities (Protection and Social Investment) Act 2016 Post-Implementation Review
[85]Charity Commission (2019) Dealing with wrongdoing and harm: statistics
[86]Charity Commission (2019) Charity regulator makes robust use of new enforcement powers
[87]Charity Commission (2019) Dealing with wrongdoing and harm: statistics
[88] Charity Commission (2015) Tackling abuse and mismanagement Annex 3: Statistical analysis
[89] Note, given changes in recording these figures may not necessarily be directly comparable.
[90] Charity Commission (2018) Final report of Charity Commission safeguarding taskforce
[91] Charity Commission (2018) Final report of Charity Commission safeguarding taskforce
[92]Charity Commission (2019) Dealing with wrongdoing and harm: lessons for trustees
[93]Charity Commission (2019) How to report a serious incident in your charity (previously revised in 2017 and 2018)
[94] The new form was launched June 2019: Report a serious incident on behalf of the trustee body
[95]Charity Commission (2019) Reporting a serious incident in your charity when it involves a partner

do so, was not replaced. [96] The new local safeguarding arrangement partners – the local authority, police and clinical commissioning group – have also gained new rights to define which local partners to work with; which now include charities, religious organisations and any person or body involved in the provision, supervision or oversight of sport or leisure. [97]
Different local areas have transitioned differently, with different titles, or having different mechanisms for the work. [98] DSLs note that the change in local provision has changed further what is available in each local area, the locally determined thresholds for intervention and mechanisms for receiving concerns about a child. While some local areas have retained provision for communicating with and training local groups, many DSLs have noted this has been reduced over time.

Increased expectations on lawful information sharing and data protection
The introduction of the Data Protection Act 2018 and implementation of GDPR led to an increased focus on how any organisation manage data, especially personal and sensitive information. DSLs have needed to understand the new legal context and ensure that their activity and the wider work of the organisation balance individuals' rights to privacy and have correct systems to aide information sharing, which keeps people safe from harm. A series of requirements must be met to ensure that any information sharing is done lawfully. [99]The new Age Appropriate Design Code statutory code of practice with compliance due from September 2021 will bring additional considerations. [100]

An' impenetrable' criminal record framework which continues to evolve and change
DSLs are often their organisations in-house 'expert' on the criminal record system; they are often involved in risk assessing roles and deciding whether knowledge of criminal records is necessary and, if so, what level of information and therefore check to seek the role.

To do so, they must become familiar with the complex web of law around criminal records. The law has been under significant rounds of reform for decades; including in the past decade and most recently with the latest requirements on filtering as a result of court judgements being introduced in November 2020.[101]In 2017 the Law Commission described these areas of law as "an impenetrable legislative framework" with a "vast array and magnitude of the problems" stating that "this is an area of law in dire need of thorough and expert analysis. A mere technical fix is not sufficient to tackle such interwoven and large-scale problems."[102]

New legal requirements on checks for senior managers and trustees
Legal reform in 2016 requires charities to adapt to new provisions of automatically preventing an individual from being a trustee and a brand-new extension of the requirement to senior management positions in charities. [103] The process has led to many charities reviewing their trustee recruitment practice and for some, addition workload, in risk assessing trustees with criminal records. DSLs will have had to become accustomed to the revised rules, explain them to others and navigate the system to see if it is applicable.

An increase in criminal acts and DSLs awareness of legal provisions
As well as increased regulation there have been a range of new and broader criminal offences which DSLs feel they should be aware of. In part this is driven by professional concern – a feeling that they should be 'on

[96]Regulation 5(1)(b), The Local Safeguarding Children Boards Regulations 2006
[97]Regulation 18, The Child Safeguarding Practice Review and Relevant Agency (England) Regulations 2018
[98] The legal reform commenced autumn 2019 but with some early adaptors transitioning at different points. For the experience of early adopters see: Clements, K. Coady, C. Martin, D. Smith, S. Munro, G. Eilenberg, J. (2019) Safeguarding Early Adopters Developing the Learning on Multi-agency Safeguarding Arrangements Final Report National Children's Bureau
[99] HM Government (2018) Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers
[100] The Age Appropriate Design Code or Children's Code applies to organisations providing online services and products likely to be accessed by children up to age 18, and gives organisations a year to make the necessary changes to put children's privacy at the heart of their design. See: Information Commissioner Office (2020) Age appropriate design: a code of practice for online services
[101]See the Protection from Freedom Act 2012 and its wider implementation; alongside continuing court cases such as R (on the application of P, G and W) (Respondents) v Secretary of State for the Home Department and another (Appellants) [2019] UKSC 3
[102]Law Commission (2017) Criminal Records Disclosure: Non-Filterable Offences
[103] Charities Act 2011 as amended by Section 9, Charities (Protection and Social Investment) Act 2016

top of things' and be able to advise their team of changes. However, it also affects assessment of safeguarding concerns that they receive and their decision making on appropriate responses; including around breaching confidentiality offered to young people.[104]

DSLs are required to keep track of laws specifically affecting children (with changes in laws such as child cruelty and exploitation), young adults (issues of knife crime, domestic violence and harassment) and with adults at risk (such as around issues of deprivation of liberty and mental health). The pace of change has been significant with major new offences on a diverse range of issues over the past five years such as definitions of child cruelty [105]; controlling or coercive behaviour[106]; forced marriage; harassment; child exploitation[107], offensive weapons[108], stalking[109] and so-called upskirting. [110]

Rising numbers known to children's services

This shift from early to late intervention comes into focus when looking at the number of children known to statutory children's social care. The numbers of referrals and those assessed as in need of support has been increasing in recent years. ADCS estimates that there has been a 19% increase in referrals to children's social care between 2008 – 2020. [111] Whilst the absolute numbers are increasing this has broadly been in line with wider population increases all be it with a modest drop most recently (see below). Within this, the proportion of children aged 10 and above had been increasing – rising from 48% in 2015 to 55% in 2020.

There has been a much steeper climb in the number of children undergoing a section 47 assessment – the local authority assessment where there is reasonable cause to suspect the child is suffering or is likely to suffer significant harm. ADCS estimates that there has been a 162% increase in Section 47 Enquiries 2008 – 2020. [112] Just looking more recently, between March 2015 and March 2020, there has been a 21% rise in the number of assessments (see below). This is much higher than the growth in the population as a whole.

The number of children subjects of child protection plans has also increased up 76% between 2008 - 2020. [113] There have been similar trends in the proportion of children aged 10 and above, rising from 29% in 2015 to 40% in 2020.

Rising numbers known to adults social care for safeguarding

The introduction of the Care Act 2014 brought into a clear statutory footing duties on local authorities to protect adults with a need for care and support and there is a concern of abuse, harm or neglect. Data recording is less comprehensive than children's services. More caution must be taken in direct comparison; there is a similar upward trend in the number of adults known to local authorities for safeguarding.

Between 2016-2020, there has been a 106% increase in number of safeguarding concerns presented to local authorities and a 62% increase in number of safeguarding enquiries launched (see table below).

[104]There are few legal obligations on staff or volunteers to report a crime. However, infirmally practicioners noted that decisions on breaching confidentiality can be affected by whether the act is itsefl cirminal rather than just unpleasat or distressing as well as the specific harm experienced by young people.
[105] Serious Crime Act 2015 amends the Children and Young Persons Act 1933
[106] Serious Crime Act 2015
[107] Policing and Crime Act 2017
[108] Offensive Weapons Act 2019
[109] Stalking Protection Act 2019
[110] Voyeurism (Offences) Act 2019
[111] Association of Directors of Children's Services (2021) Safeguarding Pressures Phase 7
[112] Association of Directors of Children's Services (2021) Safeguarding Pressures Phase 7
[113] Association of Directors of Children's Services (2021) Safeguarding Pressures Phase 7

Barriers to accessing early help support and 'thresholds' for local authority action for children

Many DSLs engagement with local authorities is the initial contact with social care services when raising a concern about a child or adults at risk of harm. In workshops, many noted the significant variation between local authorities in this process; including what services are available and the degree of active engagement when considering the concern.

Whilst action to protect children from harm are set out in law and statutory guidance; the most recent research from ADCS (2021) highlights how the application and interpretation of thresholds and the management of risk and support at the point of transfer to other services varies between authorities. 97 authorities provided commentary about thresholds in their most recent research. Just over half, 52% of authorities stated that there have been changes to the thresholds impacting either early help or safeguarding services in the past two years in their authority. [114]

These echo further research from front line practitioners. A 2018 review by the All Party Parliamentary Group on Children conducted by the National Children's Bureau analysing a survey of 1,700 frontline practitioners found that 67% thought thresholds for providing early help had risen and 70% that 'child in need' criteria had risen. Half said child protection thresholds had gone up, with a similar proportion saying that the bar for a care order application had been set higher. The research found significant inconsistency in criteria for accessing support – a postcode lottery – and that overall services are getting harder to access. [115]

Barriers to accessing mental health support

Whilst interaction with social care is a primary concern of DSLs, many also highlighted issues with barriers to accessing appropriate mental health support for young people. Independent analysis by EPI found that a in 2018-19, approximately a quarter of children and young people referred to specialist mental health services were not accepted into treatment. Referrals were most commonly rejected because providers considered young people's conditions to be unsuitable for CAMHS, or because they did not meet the eligibility criteria or age specification for the service. The authors conclude that a growing number of CYP with complex needs that do not fit clearly into diagnostic boxes, those with lower-level mental health needs and older adolescents may be unable to access the support they require. There was significant variation in local areas, for example, in London 17% of referrals were rejected, compared to approximately 28% in the South of England and Midlands and East, and 22% in the North.[116]

There are also significant waits between referral and second contact. In 2019-20, Children and young people wait on average 43 days between referral and their second contact for all services. 2% of all children and young people will wait between 8 and 10 weeks; and a further 2% between 10 and 12 weeks. [117]

[114] Association of Directors of Children's Services (2021) Safeguarding Pressures Phase 7
[115]APPG Children / NCB (2018) Storing up trouble - a postcode lottery of children's social carev
[116]Crenna-Jennings, W. Hutchinson, J. (2020) Access to child and adolescent mental health services in 2019 Education Policy Institute.
[117]NHS Digital (2020) Additional statistics to support the measurement of waiting times into children and young people's mental health services 2019-20

Trends in children's social care 2015-2020							
		2015	2016	2017	2018	2019	2020
Referrals to children's social care[a]	Referrals in the year	635,620	621,470	646,120	655,630	650,930	642,980
	Number of children with a referral in the year	553,500	547,330	571,000	581,280	575,290	568,600
	Rate of referrals in the year per 10000 children aged under 18 years	548.3	532.2	548.2	552.5	544.5	534.8
Children in Need in England[b]	Children in need at 31 March - all ages	390,130	393,910	389,040	404,710	399,510	389,260
	Children in need at 31 March - aged ten and above	188,440	195,200	195,960	208,380	212,060	214,290
	Percentage aged 10 and above of total	48%	50%	50%	51%	53%	55%
Section 47 Assessment [c]	Number of children undergoing a Section 47	146,630	156,720	167,670	177,110	179,160	177,840
	Rate of children undergoing a Section 47 per 10000 children aged under 18 years	126.5	134.2	142.3	149.2	149.9	147.9
Subject to a Child Protection Plan	All children	49690	50310	51080	52640	46230	45620
	Children subject to a CPP at 31 March - aged ten and above	14,520	15,680	16,310	18,030	17,920	18,200
	Percentage aged 10 and above of total	29%	31%	32%	34%	39%	40%
	Referrals in the year	635,620	621,470	646,120	655,630	650,930	642,980

Department for Education (2020) Characteristics of children in need

[a]A referral is defined as a request for services to be provided by children's social care and is in respect of a child who is not currently in need.[b]A child in need is defined under the Children Act 1989 as a child who is unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired without the provision of children's social care services, or the child is disabled.[c]If a local authority identifies there is reasonable cause to suspect the child is suffering, or is likely to suffer significant harm, it will carry out an assessment under section 47 of the Children Act 1989 to determine if it needs to take steps to safeguard and promote the welfare of the child.

Trends in safeguarding adults 2015-2020					
	2016 [a]	2017	2018	2019	2020
Count of Safeguarding Concerns [b]	231,220	364,605	394,655	415,050	475,560
Count of Section 42 Enquiries [c]	99,805	133,265	131,860	143,390	161,910
Count of Other Safeguarding Enquiries [d]	11,655	17,895	18,210	18,540	15,655

Source: NHS Digital (2020) Safeguarding Adults, England 2019-20 Experimental Statistics

[a] Data collection up to 2015-16 was voluntary so caution is advised when comparing this year's collection with other years.
[b] Safeguarding Concern - A sign of suspected abuse or neglect that is reported to the local authority or identified by the local authority. [c] Section 42 Safeguarding Enquiry - Where a concern is raised about a risk of abuse and this instigates an investigation under safeguarding procedures in accordance with Section 42 of The Care Act 2014. [d] Other Safeguarding Enquiry - Where a concern is raised about a risk of abuse but does not meet the three criteria under Section 42 of The Care Act 2014.

6. A profile of DSLs in the youth sector

Responses to our survey suggest that DSLs in youth organisations are primarily middle aged, white, Christian, heterosexual women. Many come from professional family backgrounds and are well educated, holding an undergraduate degree or higher. Most have been specifically involved in safeguarding for several years.

Some caution should be taken in how representative the respondents to the survey are compared to the wider youth DSL workforce. However, these trends echo those in social work roles. In 2020, 55% of children and family social workers were between 30 and 49 years of age; the overwhelming majority of full time equivalent social workers were female (86%) and majority white (78%).[118]

Demographics of DSLs in youth sector

Respondents to this self-selecting survey suggests that the Youth DSL Workforce is…

- **Predominantly women:** 61% of all respondents were women. 1 respondent stated that their gender identity was not the same as the sex they were assigned at birth.
- **Primarily middle-aged:** The average age of respondents is 46.5 years-old. Just over half (53%) are aged 40-59 years-old.
- **Vastly white:** 96% of all respondents were White British, Irish or other white background. Just 4% were Black British, defined as mixed or multiple ethnicity or any other ethnic group. No respondents stated they were Asian. The Office of National Statistics estimates that 86% of the UK population is white. [119]
- **Majority heterosexual:** 90% of respondents stated that they were heterosexual. Of the remaining, just 2% identified as gay or bisexual and 2% stating they do not identify as heterosexual, bisexual or gay. 5% prefer not to say or did not respond. The ONS estimates that 94.6% of the UK identify themselves as heterosexual with 2.9% as gay, lesbian, bisexual or other. [120]
- **From professional family backgrounds:** 62% of respondents grew up in households where the highest earner when they were 14 were in higher managerial and professional roles (eg. Directors; Doctors; Dentists; Lawyers); lower managerial and professional roles (eg. Teachers; Nurses; Journalists) or were small employers or self-employed. This suggests that many DSLs grew up in relatively middle class and professional households with the advantages and support this entails.
- **Mainly Christian:** 49% of respondents identified as Christian and 37% did not identify with any major religion. The 2018 British Social Attitudes survey found that 38% of respondents identified as Christian and 52% as no religion.[121]
- **Seldom disabled:** Just 5% of respondents stated that they have a disability. The Office of National Statistics estimates that 19% of working age adults will be disabled. [122] Whilst statistics of disability vary due to lower levels of self-identification, this suggests that there is likely to be a disproportionately fewer number of disabled DSLs than the general population.

[118] DfE (2021) Children's social work workforce Reporting Year 2020

[119] ONS (2017) Research report on population estimates by characteristics
Note, these statistics are the most recent but are not 'official statistics' on the population. Data is based on population in the United Kingdom by ethnic group, June 2016.

[120]ONS (2018) Sexual orientation, UK: 2018

[121]Curtice, J., Clery, E., Perry, J., Phillips M. and Rahim, N. (eds.) (2019) British Social Attitudes: The 36th Report London: The National Centre for Social Research

[122] ONS/DWP (2020) Family Resources Survey 2018/19. Note, caution should be taken on direct comparison given different sorts of questions used and that incidence of disability can increase with age leading to potential cofounding impacts.

Many Black Safeguarding Professionals experience unfair opportunities

Research by Kijiji with 100 Black safeguarding professionals published in 2021 found that:

- 23% agreed or strongly agreed that they received fair and equal progression opportunities compared to peers from other ethnic groups.
- 63% feel that their ethnicity has resulted in barriers being imposed upon them in their career.
- 50% disagree that they find it easy to talk about and/or raise race related issues within their organisation or with clients.
- 45% stated their organisation did not have an active Equality, Diversity & Inclusion/plan within their organisation.

Most DSLs in youth sector have high level of education

The Youth DSL Workforce is well educated. Over a third of respondents (35%) stated that their highest educational qualification is a postgraduate qualification (eg. MA, M Phil, PhD). A further 51% highest educational qualification is an undergraduate degree or equivalent. This is significantly higher than the population as a whole with ONS estimating that just 29% of adults in England and Wales hold an undergraduate degree or equivalent and above. [123]Just 5% of respondents stated that A*-C GCSEs were their highest qualification.

The Youth DSL Workforce has a higher level of qualification than the public as a whole.

Majority of DSLs have several years' experience in safeguarding

Nearly half of our respondents (49%) have been specifically involved in safeguarding for more than nine years. However, just 26% have been a DSL before the role they are currently in; of this 7% have previously held the role as a volunteer and 18% as an employee in a previous organisation.

Feedback from the members of the National Safeguarding Youth Forum indicated that this disconnect may be that their previous experience in wider areas of safeguarding led them to 'step up' to the more formal responsibility in this role and a perception that more distinct DSL roles have been created in the past decade.

There is significant longevity in organisations with over two thirds have worked in their organisation for more than three years. Indeed, 30% of all DSLs having worked in their current organisation for 9 years or more.

How many years have you specifically been….	involved in safeguarding?	Worked in this organisation
Less than 1 year	6%	11%
1 year or more but less than 3 years	5%	20%
3 years or more but less than 6 years	23%	26%
6 years or more but less than 9 years	17%	13%
More than 9 years	49%	30%
Total	100%	100%

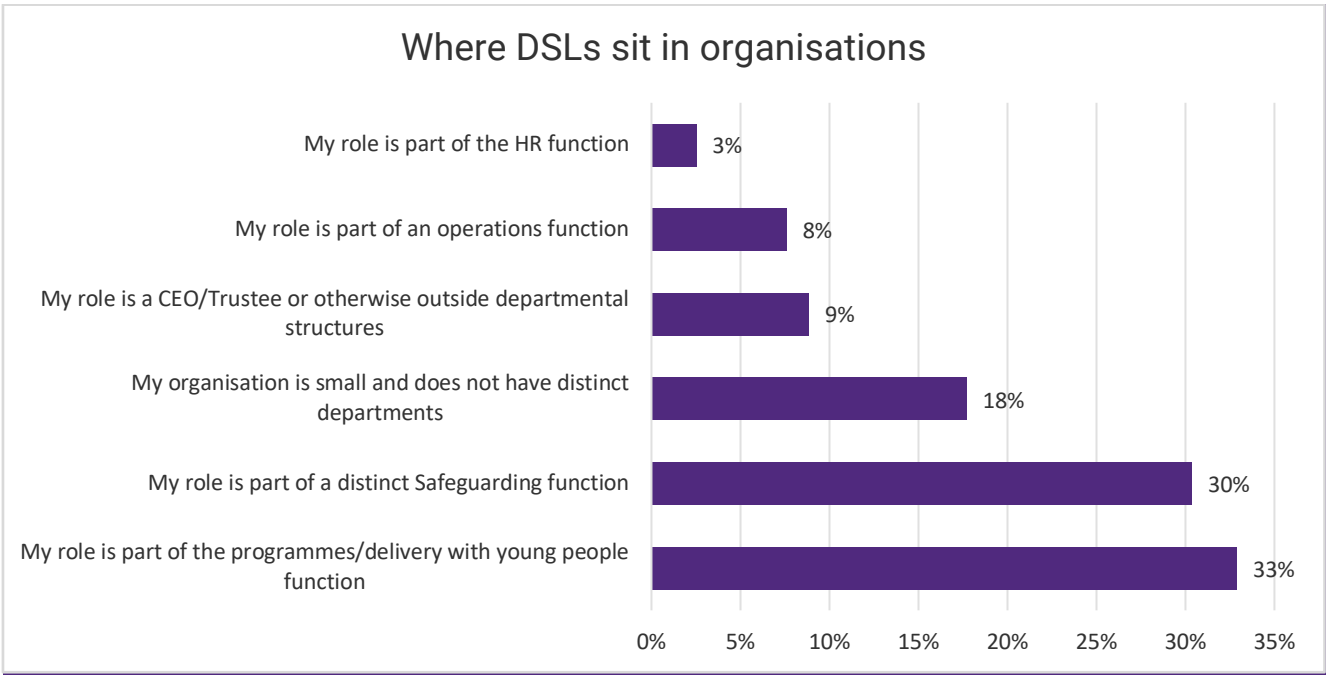
[123] ONS (2015) Highest level of qualification - England and Wales. 2011 Census estimates that classify all adults aged 18 or over by highest level of qualification in England and Wales on census day (27 March 2011).

Majority have a professional background in youth work

Respondents were asked to describe their professional background with the ability to make multiple selections given the potential for career changes. The most common background was youth work (38%) followed by children's social care (10%), the police (6%) and HR (5%).

Most DSLs work in programme delivery or a safeguarding specific function

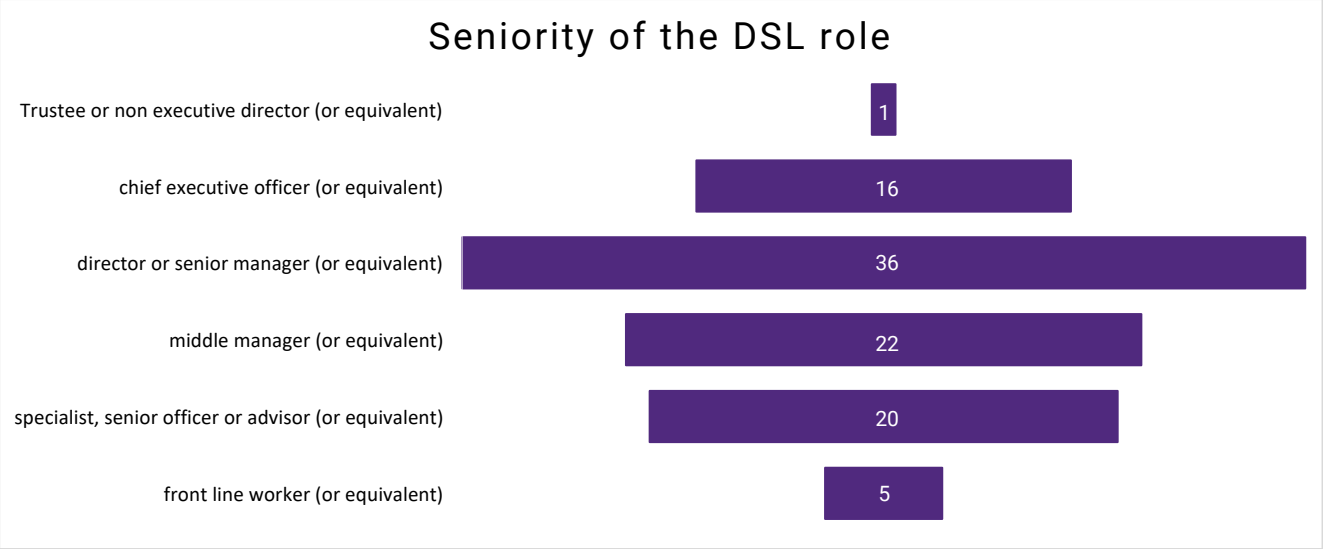
Whilst there has been some ad-hoc feedback at the National Safeguarding Youth Forum that DSLs role have moved into HR or operation functions, the vast majority remain in programme delivery focussed functions. Nearly a third (30%) of respondents sit within a distinct safeguarding function in their organisation and a further third (33%) sit within programmes/delivery with young people. Just 3% sit within a human resources department and a further 8% sit in a wider operations function.

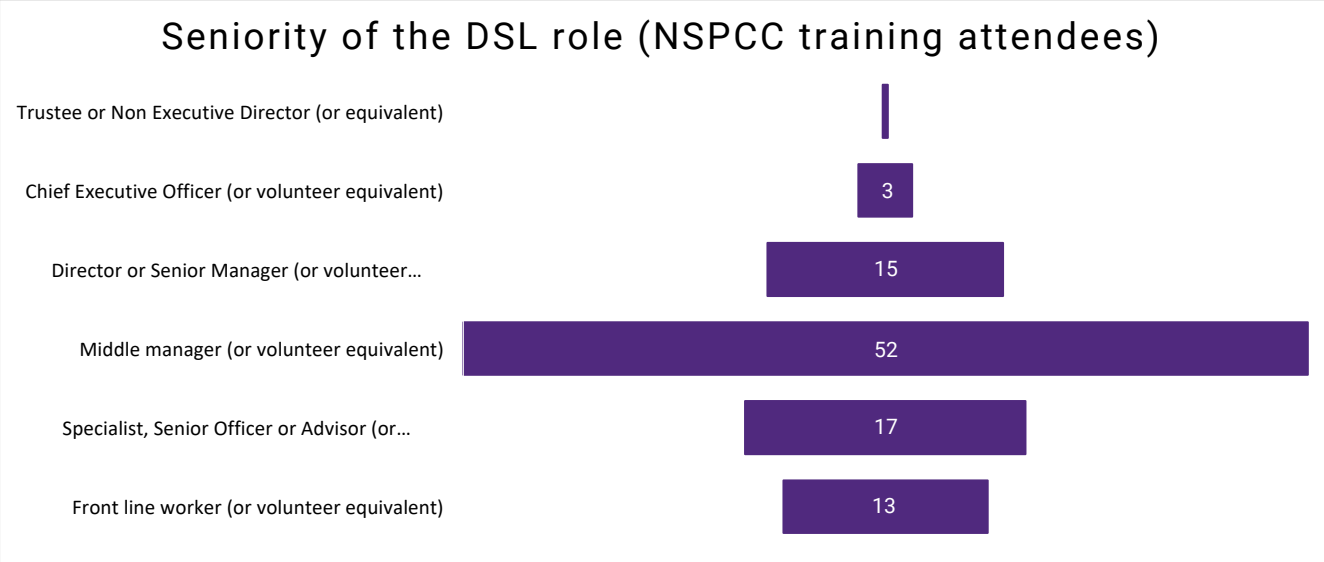


DSLs are predominantly full-time employees in senior roles

Nearly nine in ten of respondents are employed by their organisation; 84% as permanent employees and 5% as fixed term contracted employees. 5% fulfilled the DSL function as a self-employed freelance consultant.

Nearly half of our respondents (51%) were either senior managers, Directors or CEOs of their organisations.

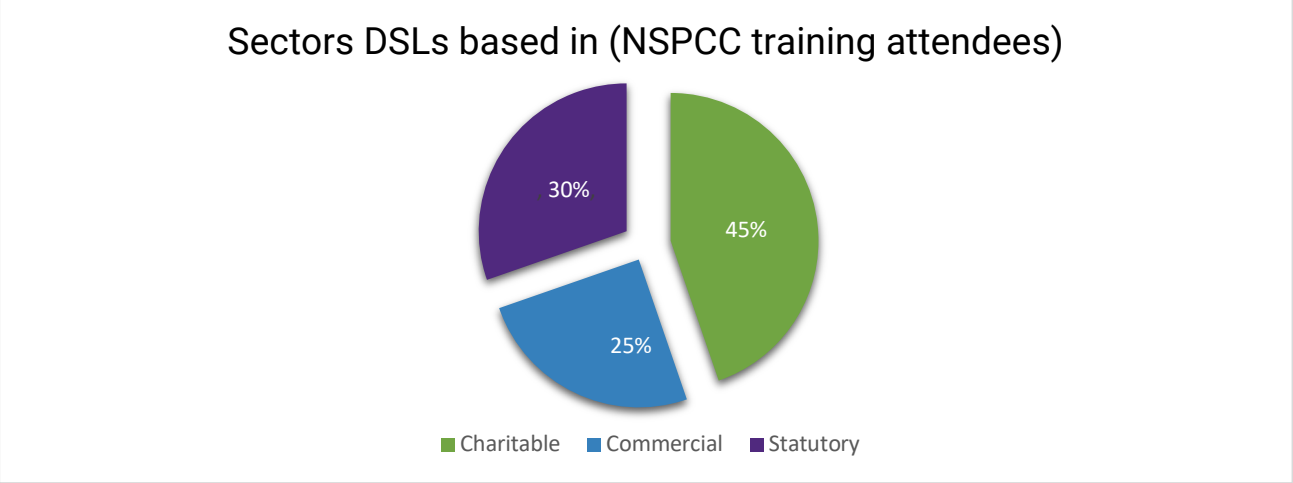


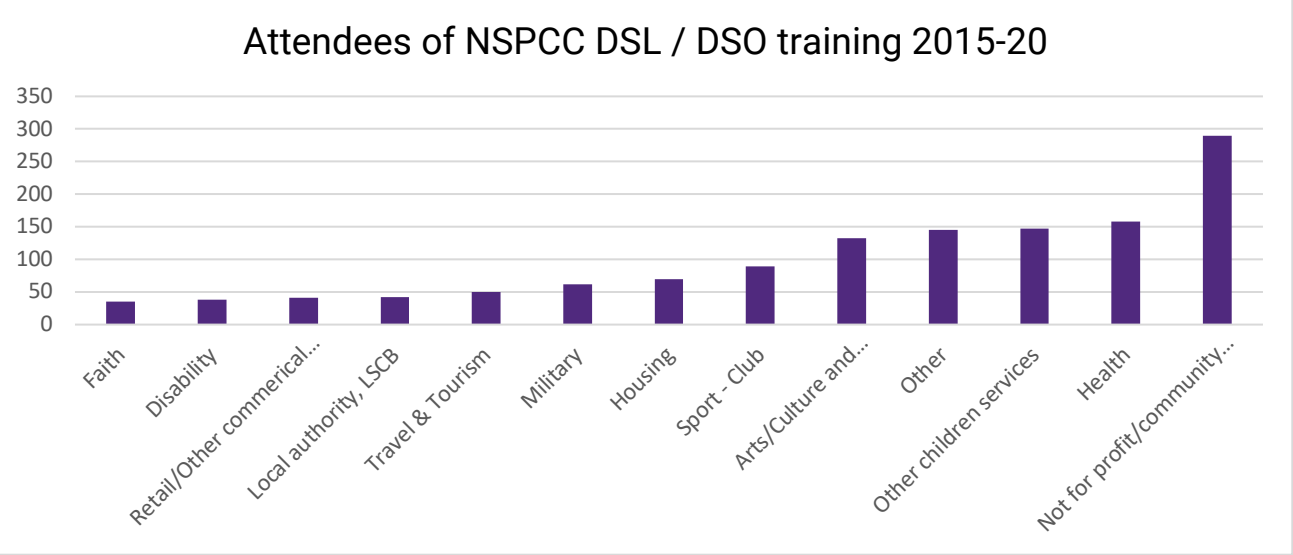


The profile of respondents to the survey does vary to those who have attended the NSPCC training courses over the past five years. This shows a greater proportion in middle manager and front-line worker roles attending NSPCC training.

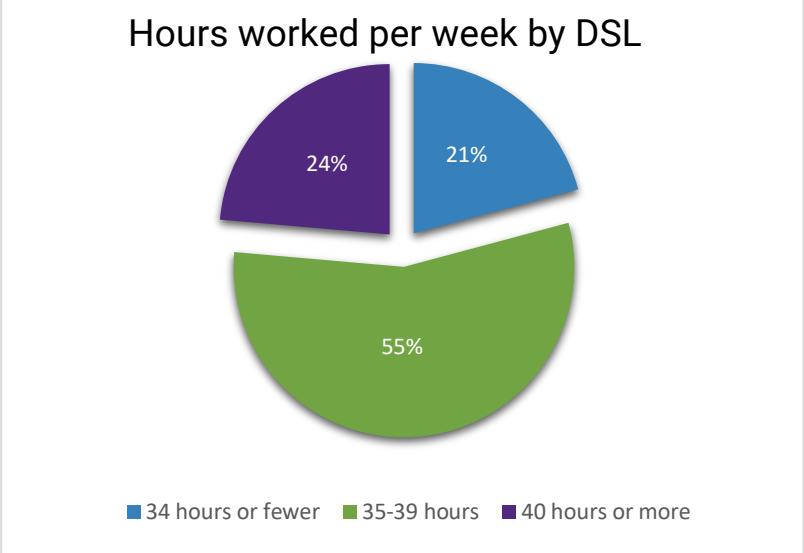
DSLs are found across sectors

The much larger sample of NSPCC attendees does give some insight into the sectors that DSLs are working in. Approximately 45% of attendees were in charitable and not for profit organisations and a third (30%) in statutory organisations.





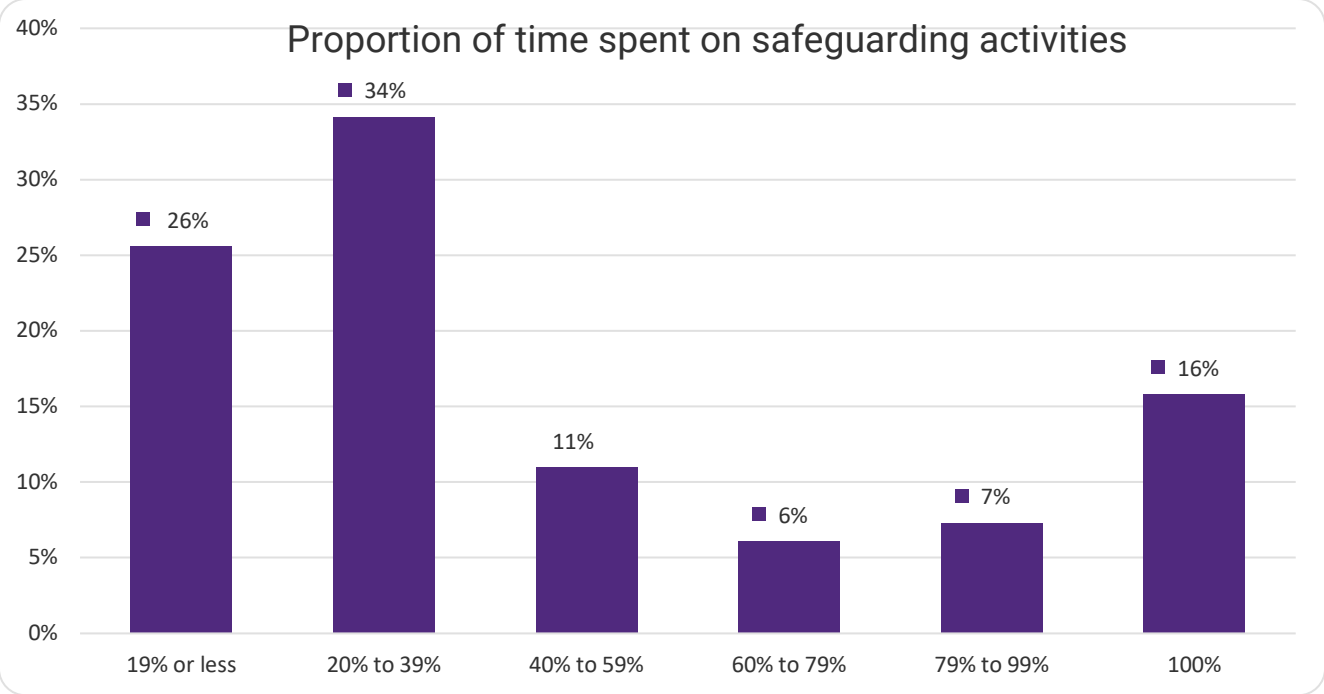
Of the respondents to the NSYF survey, who were either permanent or fixed term employees (72), the majority work full time or more assuming an average working week of between 35-39 hours per week. However, more than a quarter of DSL respondents are in roles where they work more than 40 hours per week. The more senior the role; the more hours that the role was working for the organisation.



For most DSLs, the responsibility is just one part of a wider role

For the majority of DSLs, the role is just a part of their role. More than 1 in 4 DSLs spend less than 20% of their time on safeguarding related activity; with 60% spending less than 40%.

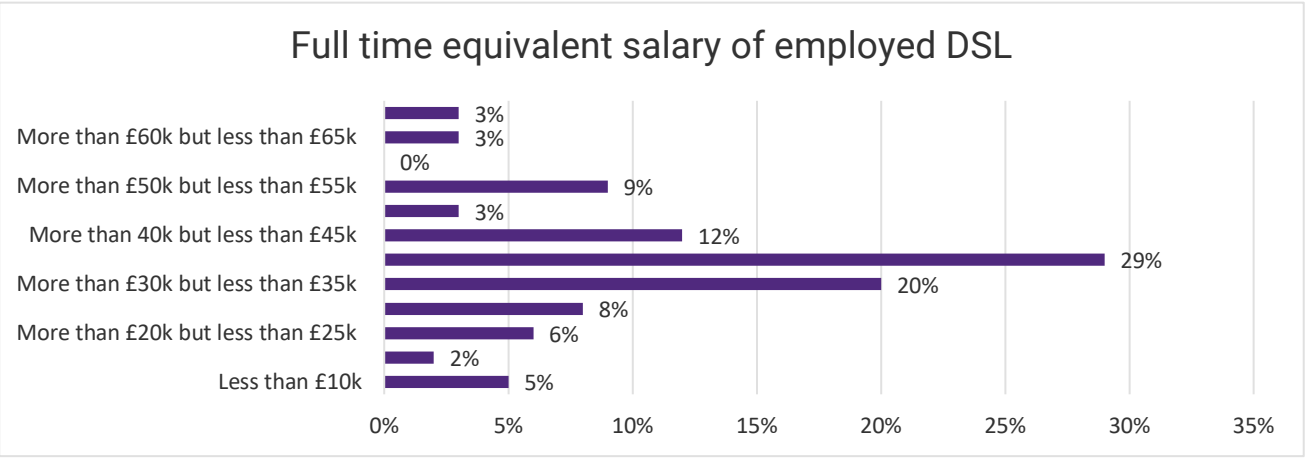
Just 16% of respondents are exclusively DSLs. Of these, 62% (or 12% of the total respondents) work 35 hours per week or more. All of these have safeguarding in their job title and the vast majority work in distinct safeguarding functions.



Most employed DSLs earn between £30,000 - £45,000

Employed DSLs who shared their full time equivalent annual salaries (n=65) show that nearly a third (29%) earn between £35,000 - £40,000 with a further third earning within £5,000 of this. Those earning higher amounts tended to be CEOs or Directors with lead safeguarding falling within their wider remit. The 16% of respondents who are exclusively fulfilling a safeguarding role had a similar profile of pay as those undertaking DSLs responsibilities as part of a wider role.

There was however some dissatisfaction with current recognition. When asked, just 52% of respondents agreed that their organisation offers suitable recognition and reward for their role as safeguarding lead. More than 1 in 10 (12%) strongly disagreed they received appropriate reward.



Most DSLs are line managers

74% of DSLs are line managers of other employees in their organisation; falling to just 34% line managing volunteers. Comments in the survey indicate that whilst few directly manage volunteers; they may have a role in the supervision and accountability of volunteers in their organisation more widely.

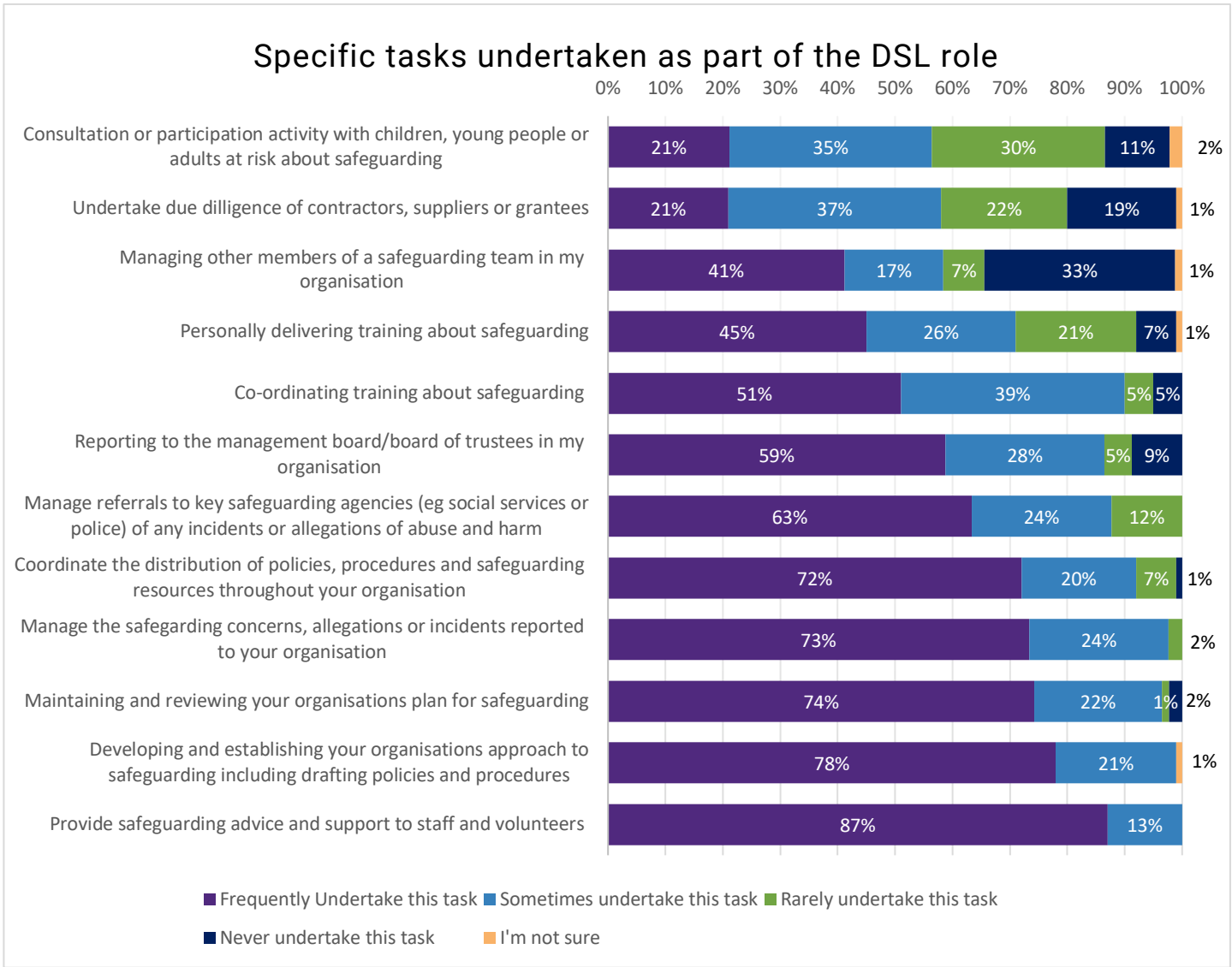
Tasks undertaken by DSLs

Unsurprisingly, the most frequent task of DSLs is to provide safeguarding advise and support to colleagues. Likewise, more than two thirds of DSLs regularly develop organisation approach to safeguarding and disseminate these into the organisation and manage any concerns, allegation or incidents which may arise.

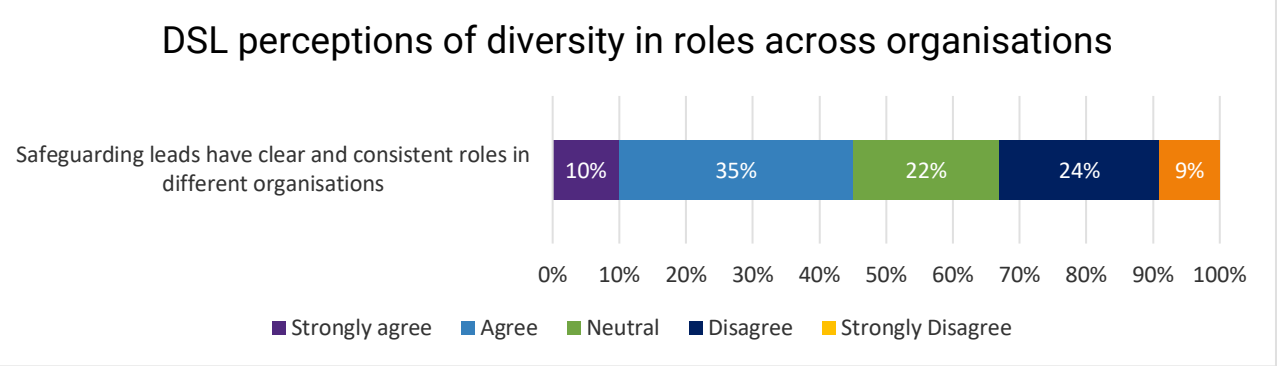
61% have a written role description for the safeguarding lead role.

Nearly 1 in 10 DSLs (9%) report that they never report to the management Board/Board of trustees in their organisation with just 59% reporting that they do this frequently.

Least frequent tasks include due diligence of partners and consultation with intended beneficiaries. Just 1 in 5 DSLs frequently engage in due diligence of contractors, suppliers or grantees or undertake consultation or participation with children, young people or adults at risk about safeguarding. Indeed; 1 in 10 (10%) never undertake any consultation or participation activity and a further third (30%) only doing this rarely.

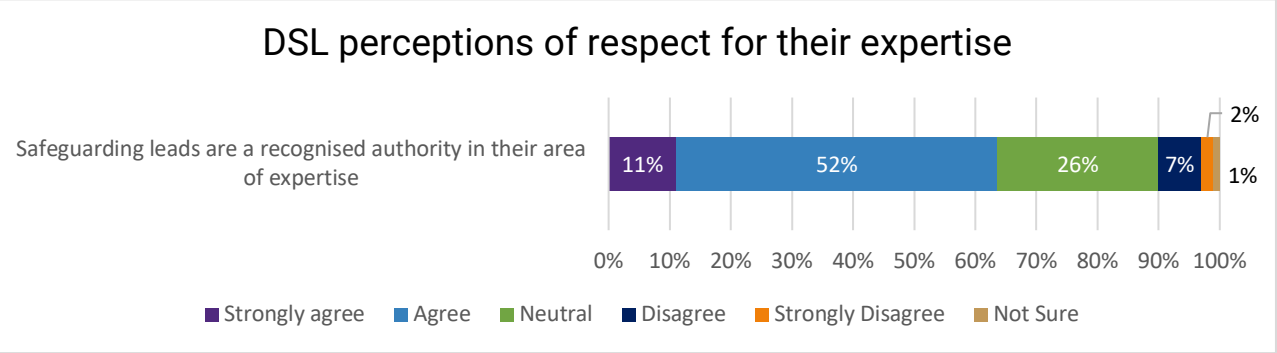


Whilst noting there is significant similarities in the tasks DSLs state they undertake; many perceive themselves as having significant differences between the role in different organisations. Fewer than half agree that DSLs have a clear and consistent role across organisations; and more than a third disagree with the statement.



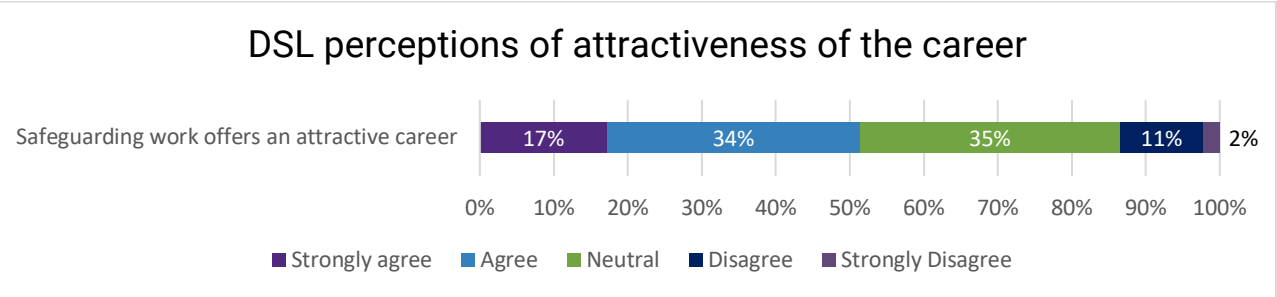
Perceptions of respect for their role

A majority (63%) agree or strongly agree that DSLs are a recognised authority in their area of expertise. Whilst a clear majority; it still means that nearly 2 in 5 (37%) felt unable to agree with the statement. This is a sizeable minority suggesting many DSLs feel their expertise is not respected.



Longer term career prospects

Only half of DSLs (51%) believe that the role offers an attractive career. Key concerns raised in interviews included concerns that the roles was often misunderstood with an underestimation of the complexity and range of skills needed to be successful. Furthermore, the lack of future progression with no clear path to wider roles and only progression being to larger organisations (and even within this limitations as to what is possible) and limitations on pay and reward.



"I don't think there's a natural career progression unless you're within a social work field or health field. Which is a shame, really."

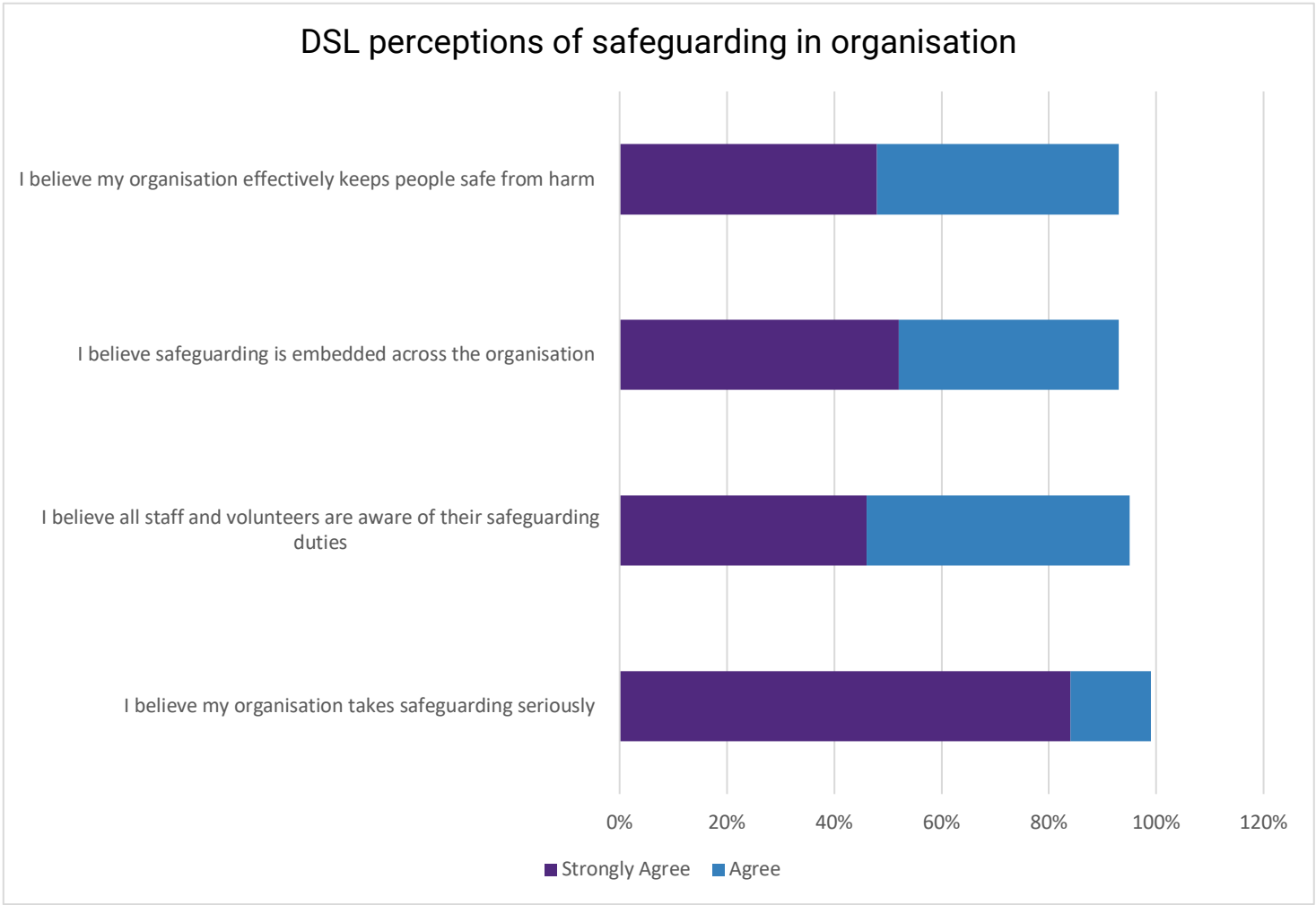
7. Organisational approaches to safeguarding

DSLs are part of a wider organisational commitment to safeguarding. The spur in regulation and changes in needs have led organisations to evolve their whole organisation approach to safeguarding.

> *"I think organisations need to understand this type of role. Do you know how many skills are called upon? Do you know how much we need to know? Do you know how much we have to move across the organisation? We spend time in one day with a fundraising team, with a frontline member of staff, with the legal team, with the risk manager, the assurance person, the CEO. You know, we move across organisations in really different ways to other roles."*

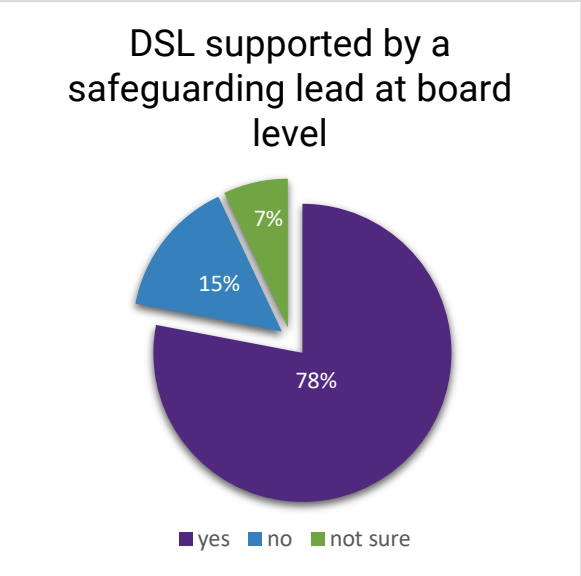
DSLs have positive perceptions of safeguarding in their organisation

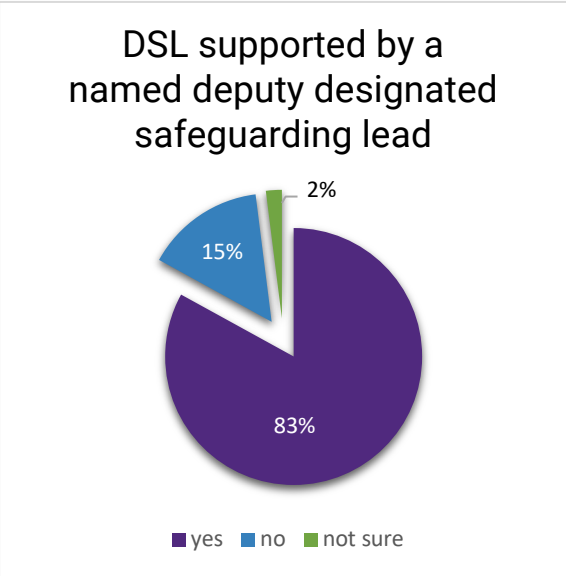
DSLs are very positive about how their organisation approaches safeguarding. 99% agree or strongly agree that their organisation takes safeguarding seriously. Similarly, more than 90% agree or strongly agree that safeguarding is embedded; with a team aware of their duties and that overall the organisation is effective at keeping people safe from harm.



Most DSLs are supported by others

The majority of DSLs have a team of other designated safeguarding roles which support them in their role. Positively more than four in five (83%) have a named deputy DSL and 78% have a safeguarding lead on their Board.





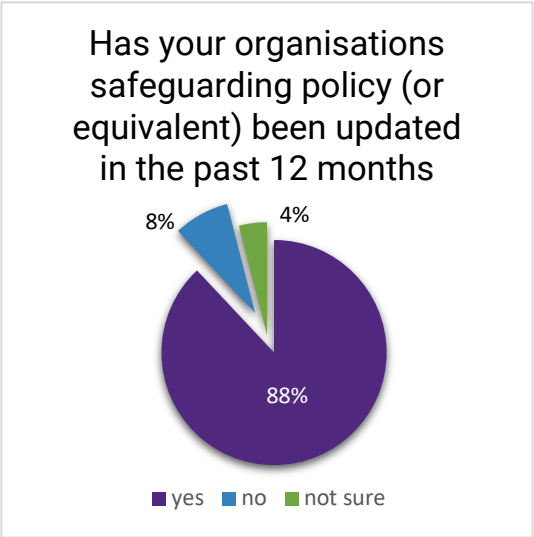
15% stated they did not have a Board lead counterpart. 7% stated that they were not sure whether their Board had a designated safeguarding lead. These respondents were all permanent employees working full time hours and in middle manager or above roles. Whilst respondents were disproportionately drawn from national organisations this may reflect broader gaps in information sharing; it suggests that for a small number of DSLs there is a significant communication gap with wider safeguarding governance and oversight structures.

> *The CEO understands the importance of it. They understand that if they get that risk area wrong, it's going to impact heavily on them. So they want to know how to manage and mitigate and they rely on me to do that. That's a scary thought actually…*

Most organisations have updated their Safeguarding Policy in the last year

The Charity Commission requires all registered charities to review their Safeguarding Policy at least annually. The vast majority (88%) of DSLs state that their organisation have updated their Safeguarding Policy (or equivalent) within the last twelve months.

However, nearly one in ten organisations (9%) have not met this requirement. A further 4% are unsure whether the policy has been updated. Given that this survey is likely to have been completed by some of those most engaged in wider safeguarding issues and understanding of regulation, this may suggest that compliance with the requirement may be even lower in the wider youth sector.

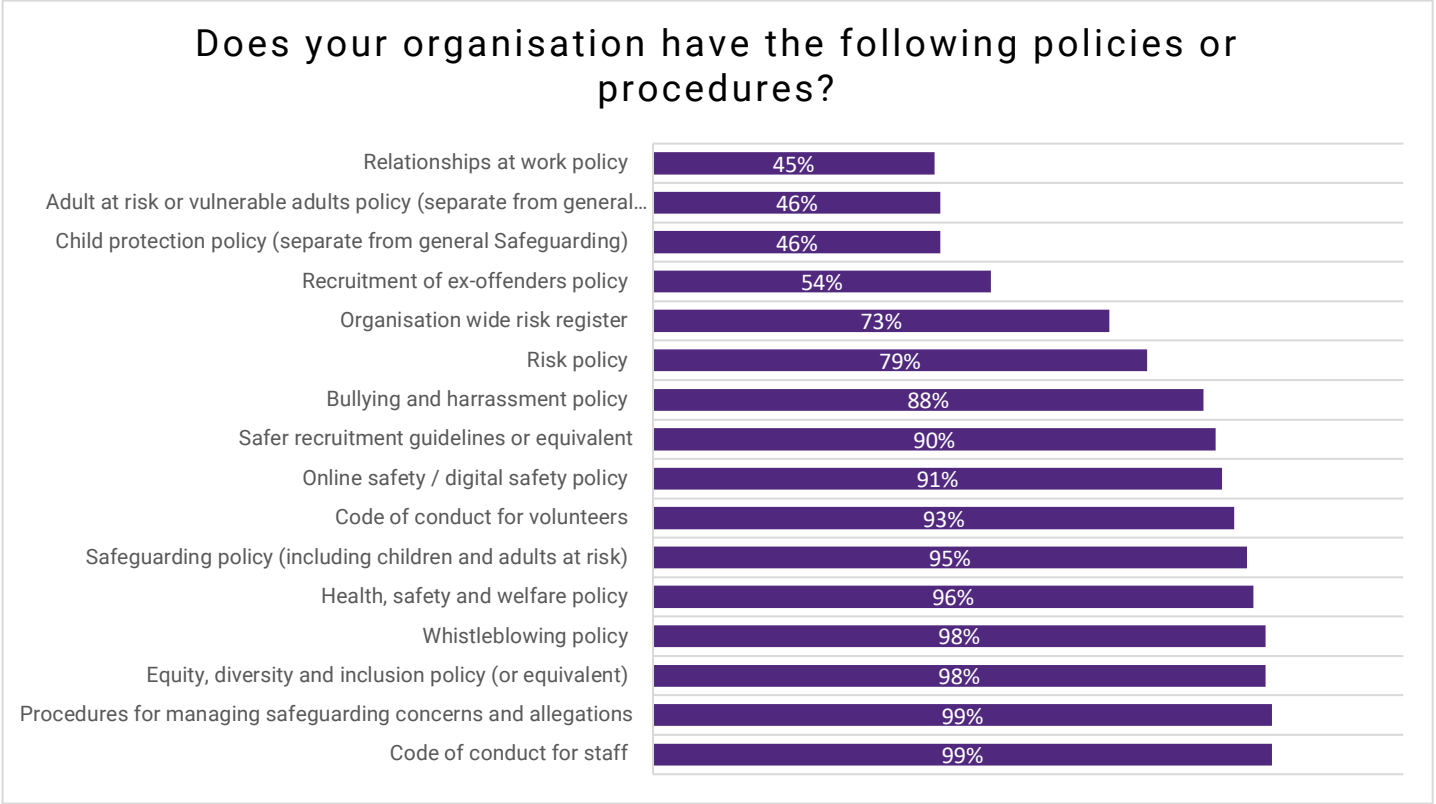


Most organisations use a wide range of policies and procedures to manage safeguarding issues

Respondents indicated that there is a wide range of different policies and procedures which they use to manage safeguarding in the organisation. The most common include those which have a basis in legal obligations such as the core Safeguarding Policy (whether an overarching policy, a separate policy for children and adults at risk or all three); Equity, diversity and inclusion; Health, Safety & Welfare and Whistleblowing. 9 in 10 organisations exceed statutory requirements by having specific online/digital safety policies and safer recruitment guidelines (or equivalent).

There were lower levels of organisations with a comprehensive approach to managing risk with 79% holding a risk policy leaving nearly 1 in 5 organisations without a clear statement of risk appetite and assurance. Similarly, whilst 73% were aware of an organisational risk register this means that over 1 in 4 DSLs are in organisations without an organisational wide risk register.

Organisations that use information from the DBS are required by the statutory DBS Code of Practice to have a policy on the recruitment of ex-offenders.[124] However, only 54% of respondents were able to confirm they had this in place. Given the high likelihood that many respondents use information from DBS checks; this suggests there is a gap in compliance with the Code of Practice or lower levels of understanding amongst DSLs of their organisations policies.



> *"Unfortunately, I don't think that the systemic issues would have been addressed in all organisations, it would be really useful to have what a minimum standard should look like for a charity. And that doesn't exist. I do appreciate the Charity Commission's work. But I don't think it quite hits the mark. It's, again, it's small charities and large shades. It's trying to be one thing to all which is impossible. "*

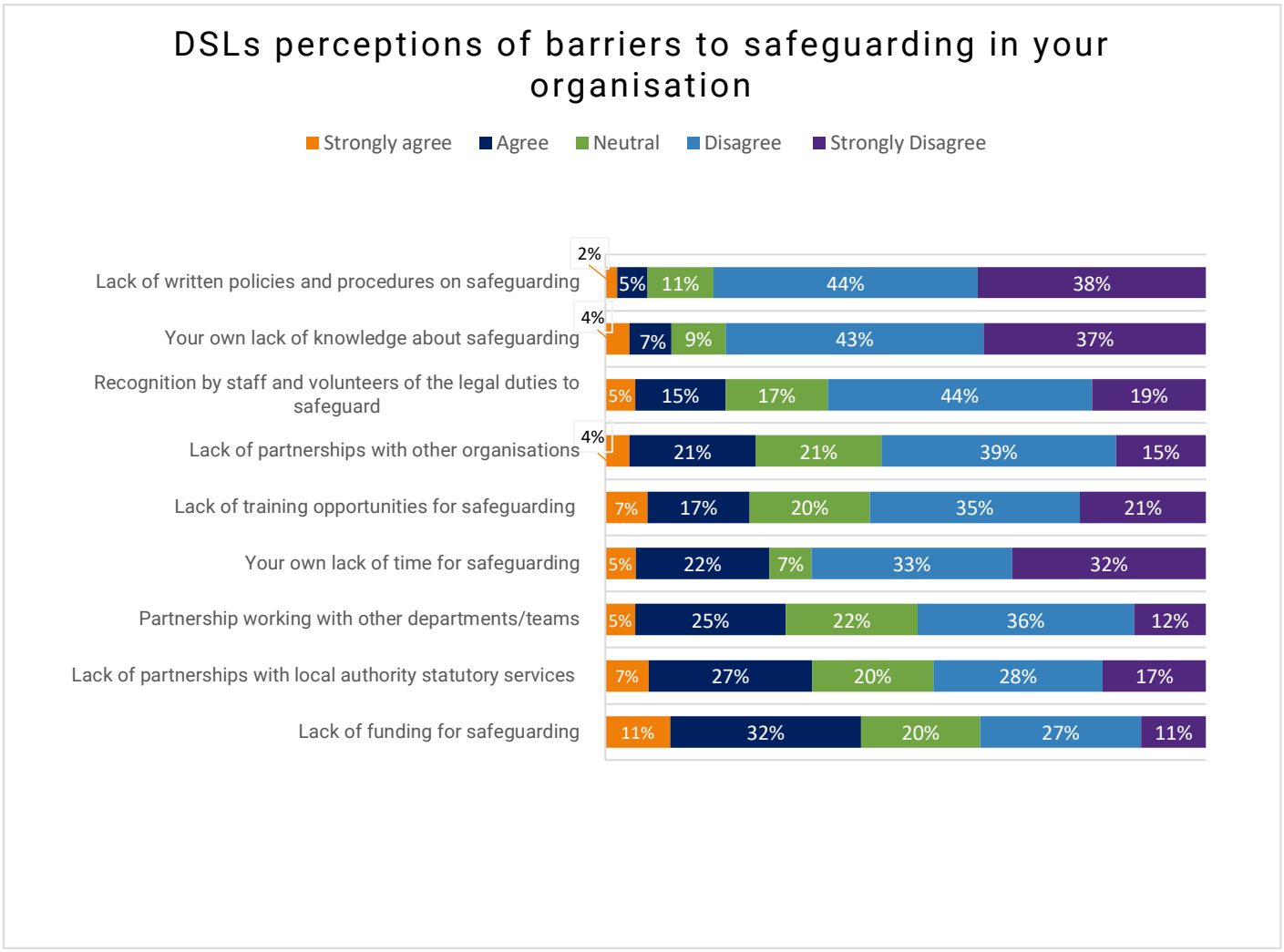
[124] Home Office (2015) Revised Code of Practice for Disclosure and Barring Service Registered Persons

Barriers to implementing effective safeguarding

There were limited experiences of barriers to safeguarding in the organisation with no one presented barrier having a significant majority. Lack of funding for safeguarding activity was the only presented barrier with more agreeing it was a barrier (43%) than disagreeing (38%).

Respondents were confident of their own knowledge of safeguarding with 80% disagreeing that this posed a barrier to their activity.

> *"I think there's so much that I want to do in my role as designated safeguarding lead, but I can't because all of our funding, our business plan was already kind of written before I arrived, and we've got all these things to deliver on. And so I feel like things could be so much better and, and tighter, but I don't have the capacity to do it in my current role and you know that's what I'm hearing from colleagues as well."*



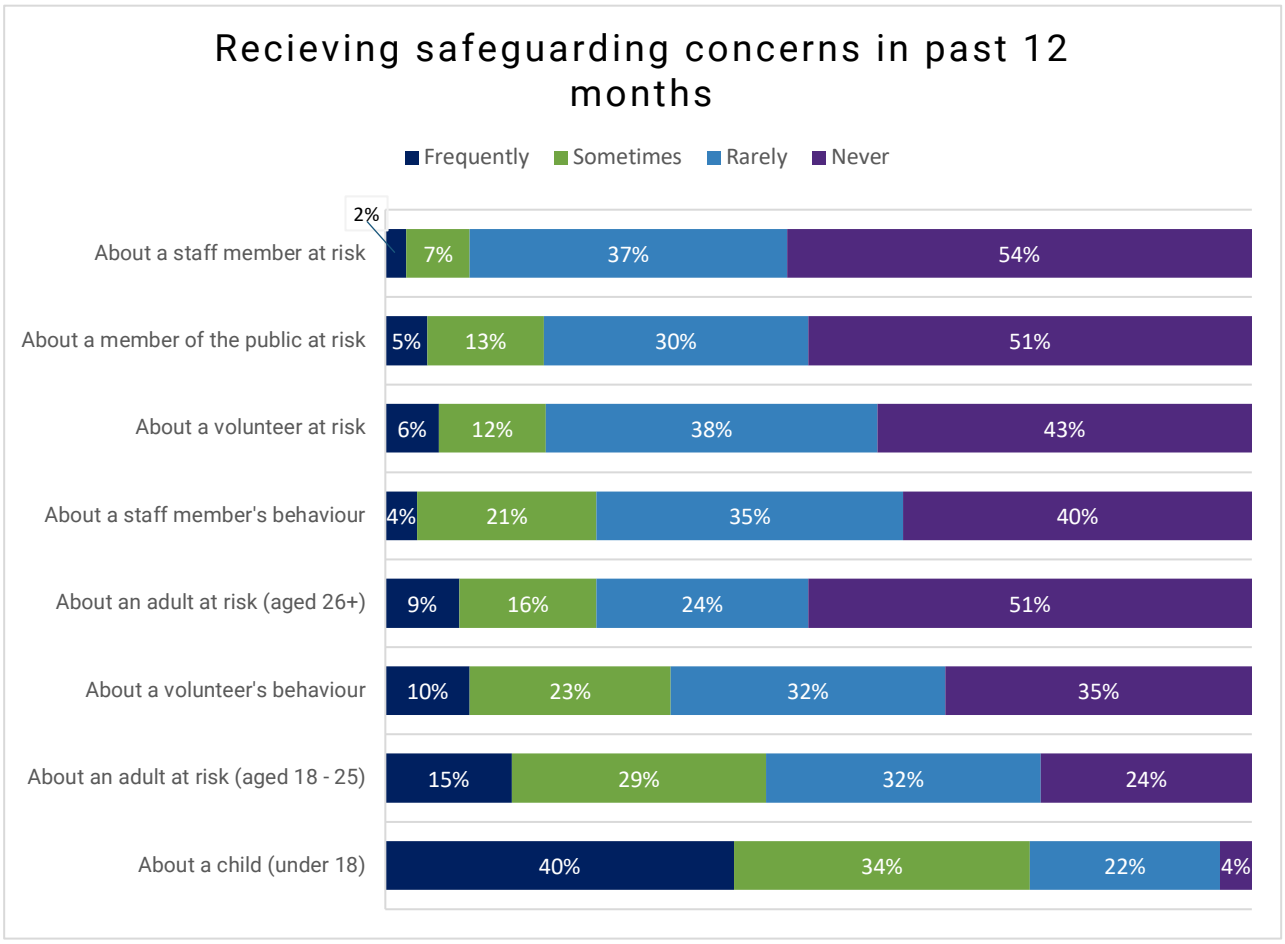
8. Responding to concerns and engaging with statutory services

The most common concerns received related to children

Almost all DSLs (94%) have received a concern about a child in the past year and more than two thirds (76%) have received a concern about a young adult aged 18-25 years-old. The least common concerns received by DSLs related to staff members, adults aged over 26 and about members of the public.

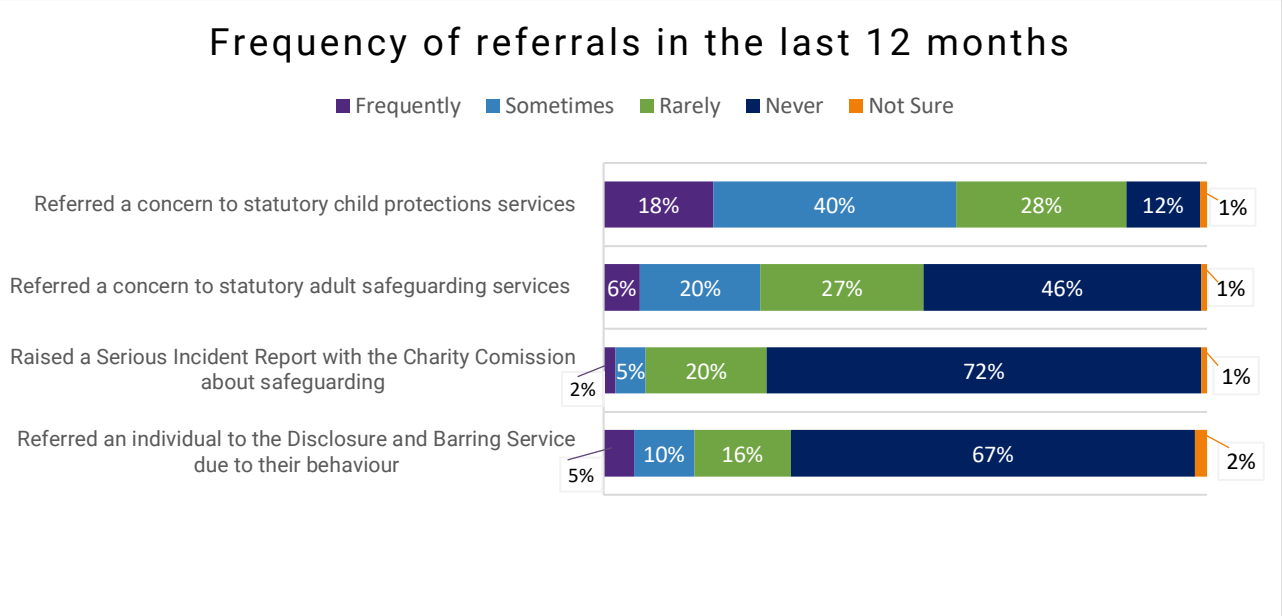
The majority of DSLs receive concerns about the behaviour of the workforce

Slightly more DSLs received concerns about the behaviour of volunteers (65%) than for staff (60%). However, this is likely to be linked to many youth organisations having a greater volume of volunteers than employed staff.



DSLs are most likely to make referrals to children's social care

Perhaps unsurprisingly given the proportion of DSLs who receive concerns about children; 87% of DSLs have referred a concern to statutory child protection services in the past twelve months.



The majority of DSLs rarely or never receive concerns about adults at risk, staff or volunteers but just over half (53%) have completed a referral to statutory adult safeguarding services. The frequency is however much lower than for children – with just 6% making referrals frequently and 20% sometimes.

Engagement with other statutory referral services is much lower with around a third of DSLs having made a referral to the Charity Commission (27%) or the Disclosure and Barring Service (31%). There is slightly higher frequency of referrals to the Disclosure and Barring Service with three in twenty DSLs making a referral at least sometimes.

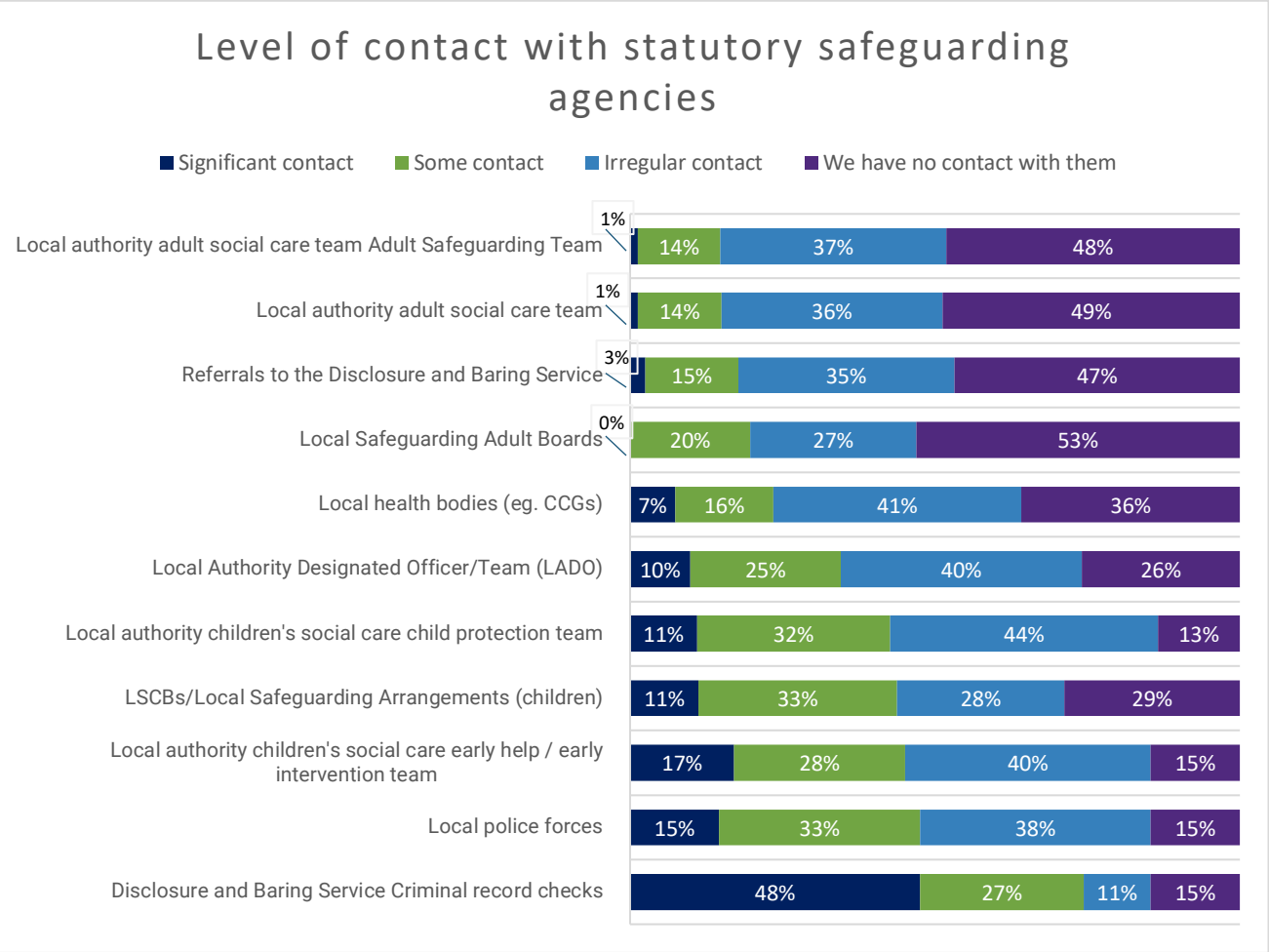
> *"I feel, actually, I feel the pressure of it all. And I feel that weighs heavily and actually can really be a distraction in managing an incident. Particularly if you've got the donor screaming in one ear and you're trying to manage things in a survivor-centred way. The kind of the weight of the compliance thing hanging over you, when you're managing an incident. I think it's important that you stay focused on the survivor, and not the compliance piece. "*

Most DSLs have limited contact with statutory safeguarding agencies

The level of contact with statutory agencies with safeguarding responsibilities is fairly low. By far the most common is with the Disclosure and Barring Service in relation to criminal record checks. Nearly half (48%) have significant contact with the service. However, interestingly, 15% state that they have no contact with the Disclosure and Barring Service in relation to criminal record checks. This might suggest that the DSL role itself is not involved in the criminal record check process for their organisation or this represents a range of organisations which do not undertake any form of DBS check.

Mirroring similar rates of referrals to child and adult protection services there is more frequent contact with early help services for children; child protection teams and the Local Authority Designated Officer/Team which deals with allegations against those working with children.

Contact with local multiagency statutory safeguarding arrangements varies significantly with a significant proportion of DSLs having limited or no contact. Nearly 1 in 3 DSLs (29%) have no contact with their local safeguarding children arrangements and more than half of DSLs (53%) have no contact with their local safeguarding adults boards.



DSL experience of referral and engagement is mixed

Many of the comments in the survey and more in depth exploration in interviews found very mixed experience of engagement with statutory services. Many reported significant barriers to making referrals and ensuring that the information was accepted by statutory services. Some highlighted that if they were working either in multiple local authority areas they see very different practices and variation as to the how seriously the perspective of the youth sector was taken.

> *"Not always easy to find out whether referrals have been acted on and followed up - statutory agencies not always seeming to recognise that we have ongoing relationships with families and individuals and need to be kept in the loop about what is going on - although of course we recognise the need for people's privacy to be respected."*

> *"Hard to make referrals sometimes if you are working in a voluntary capacity and cannot get hold of someone easily, as there can be time pressures due to work commitments."*

> *"Don't always take charities seriously, or just there when they need us to work with a young person but not to keep us in the loop, or part of the conversation. Sometimes hostile."*

"This is so variable across the country. There are times where we have been ignored/dismissed due to being from sport."

"At times when we say we are youth and community workers we feel that we are not recognised."

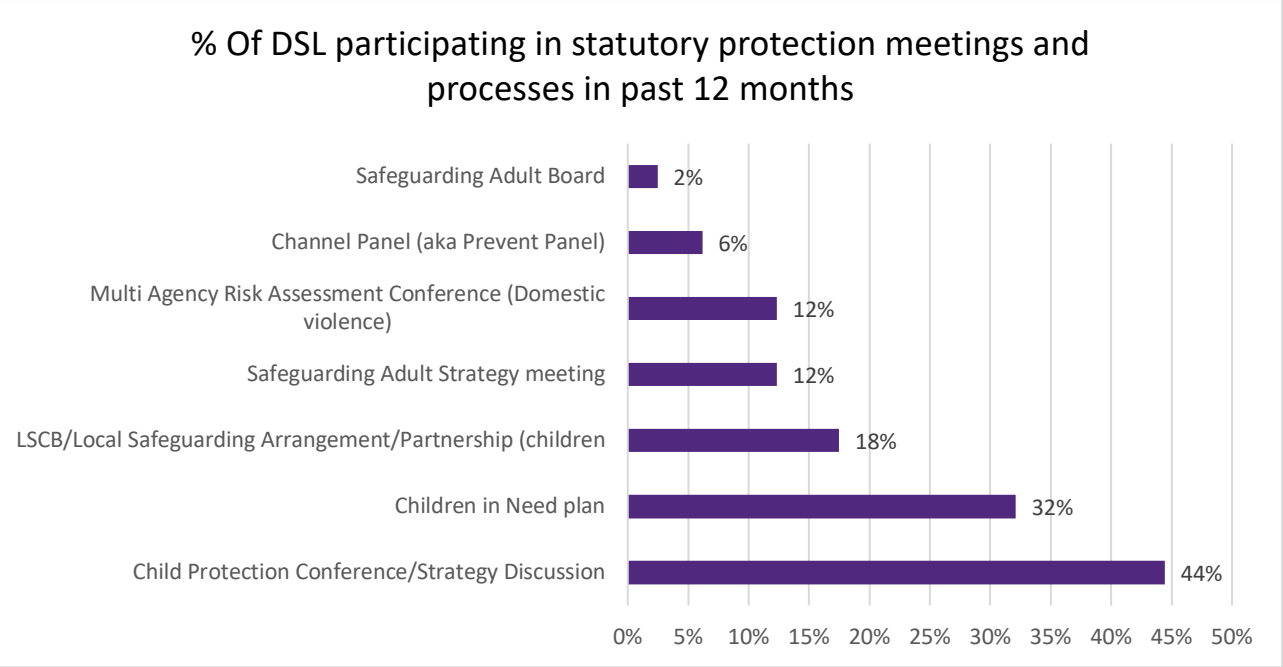
"Developing relationships with statutory agencies is incredibly difficult and a real barrier to effective safeguarding. Statutory agencies often seem very dismissive of the voluntary sector and Youth Workers and often are unwilling to share information although they want and require us to share information with them it is very much a 'one way street'."

"We tried to make a safeguarding referral for a young man who was at risk of suicide, as well as contacting mental health agencies. We received a response a number of days later saying that this was not about abuse or neglect and they would not be taking forward as we needed to go down the mental health pathway. We asked for a phone call meeting to discuss so we could understand their pathways etc and we did not get a response. I agree with their response, that there is the mental health pathway for such cases, but the interaction and lack of relationship building was disappointing."

DSLs contribute to key statutory safeguarding processes

A minority of DSLs are involved in the key statutory multi-agency planning meetings and processes to protect children and adults at risk. Whilst 58% have at least sometimes made a referral to children's social care in the past twelve months; just 44% were then involved in child protection conferences or strategy discussions and 32% with children in need planning meetings.

Even smaller number were involved in meetings to safeguarding adult strategy meetings (12%); Multi-Agency Risk Assessment Conferences (12%) and in Channel Panel meetings (6%). This perhaps also represents that these meetings themselves are less frequent.

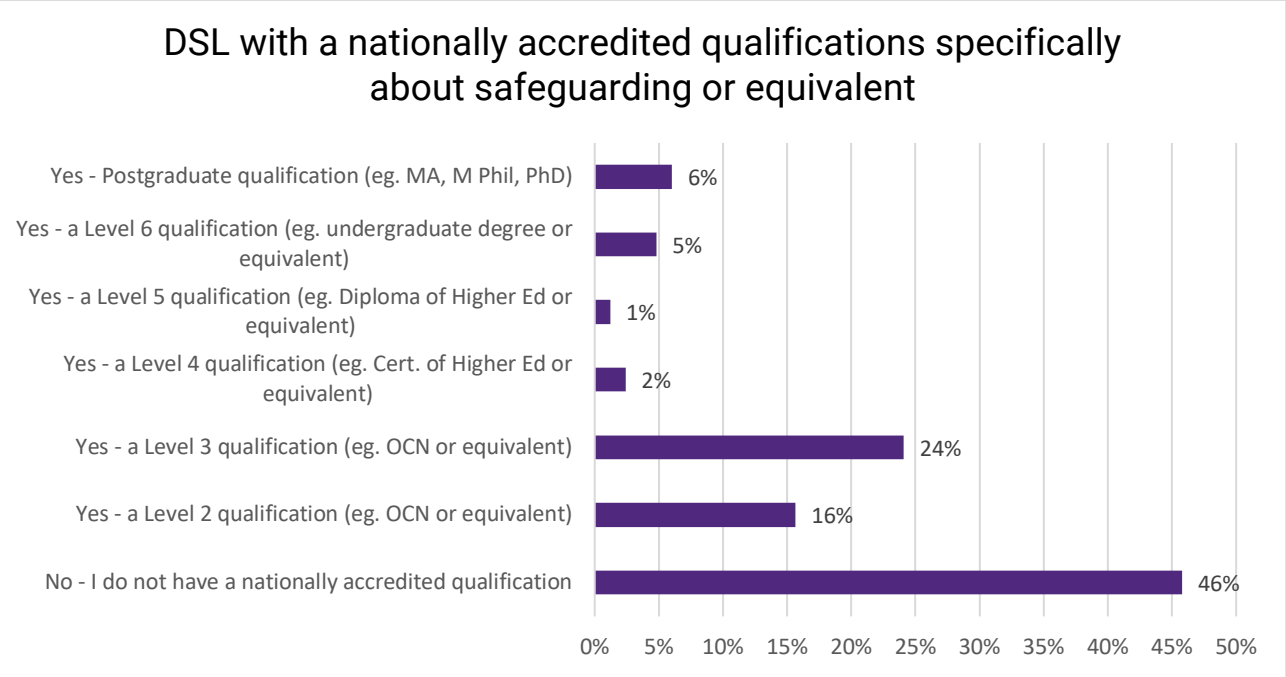


9. Training and support

Just over half of DSLs have a nationally accredited qualification in safeguarding

Just over half of DSLs (54%) report that they have a national nationally accredited qualifications specifically about safeguarding or equivalent (eg. child abuse, child protection, adult safeguarding). The vast majority were entry level qualifications with a combined 40% have a Level 2 (equivalent to GCSE grades 9 - 4 or A* - C) a or Level 3 qualification (equivalent to A level).

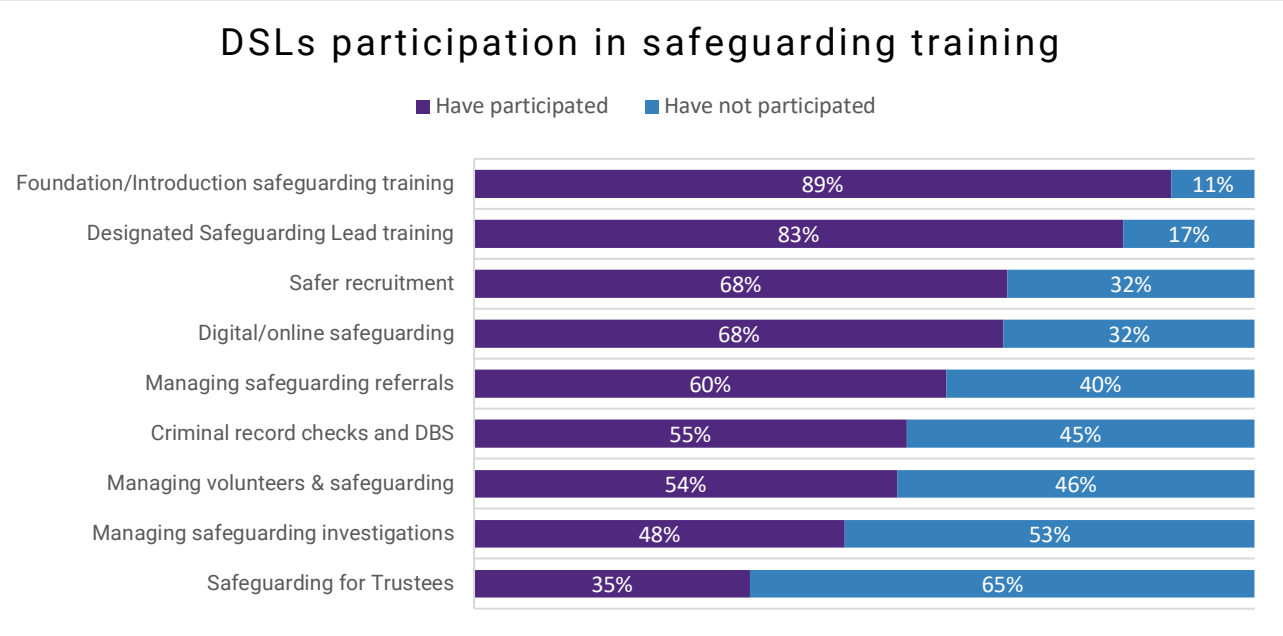
However, a very significant proportion have no nationally accredited qualification. If they have had training it has been without external verification or recognisable accreditation.



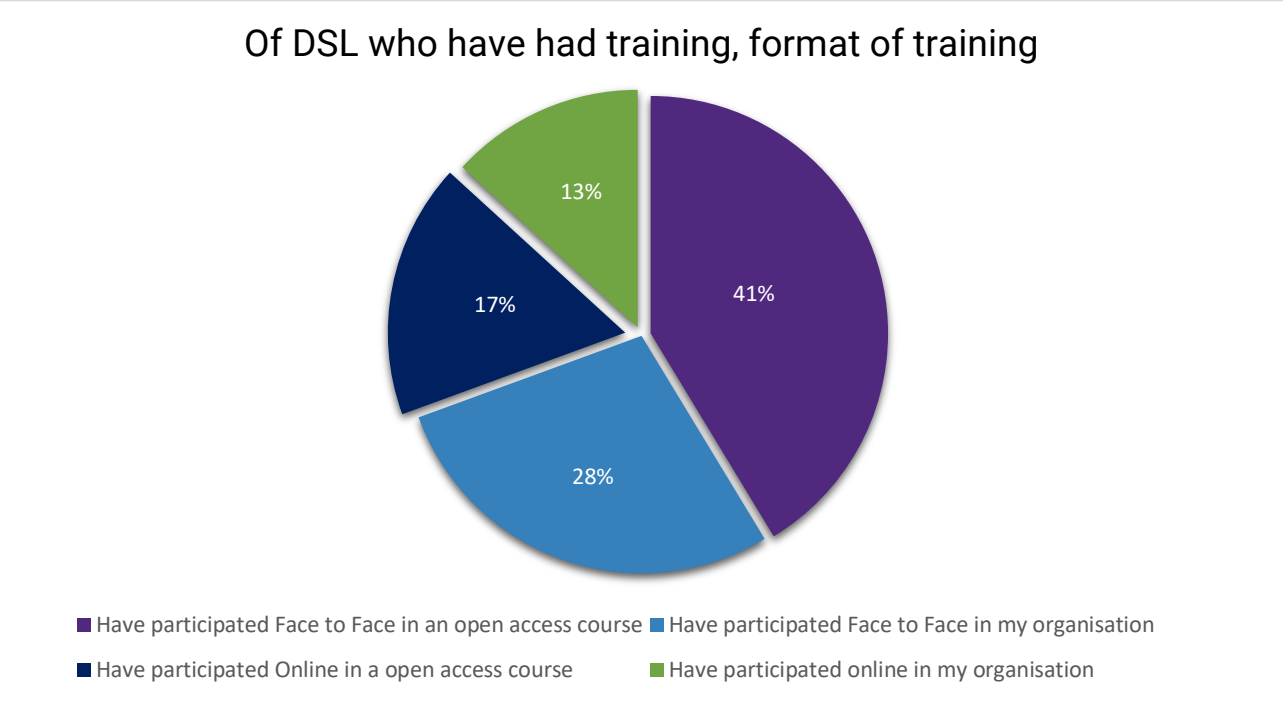
Note, this represents a count of all qualifications with some respondents listing multiple qualifications.

> *"So really, all the knowledge that I have on safeguarding is absolutely driven by young people teaching me what life is really like. I haven't learned it from a book. I haven't learned it from many training programmes. And I think young people have been the biggest teachers and the hardest to listen to in here."*

Vast majority of DSLs have had some safeguarding training



Of those who have had training the majority have had training face to face (69%). The majority of DSLs (59%) have had training on open access courses where they would have been with participants from a wide range of other organisations.



Note, this represents a count of all training with some respondents listing multiple training.

Most DSLs trained by national charities and local authorities

DSLs reported they were most likely to have participated in training with national child protection charities or from local authorities/safeguarding children partnerships. Far fewer had participated in specialist training from a youth work organisation or in safeguarding adults.

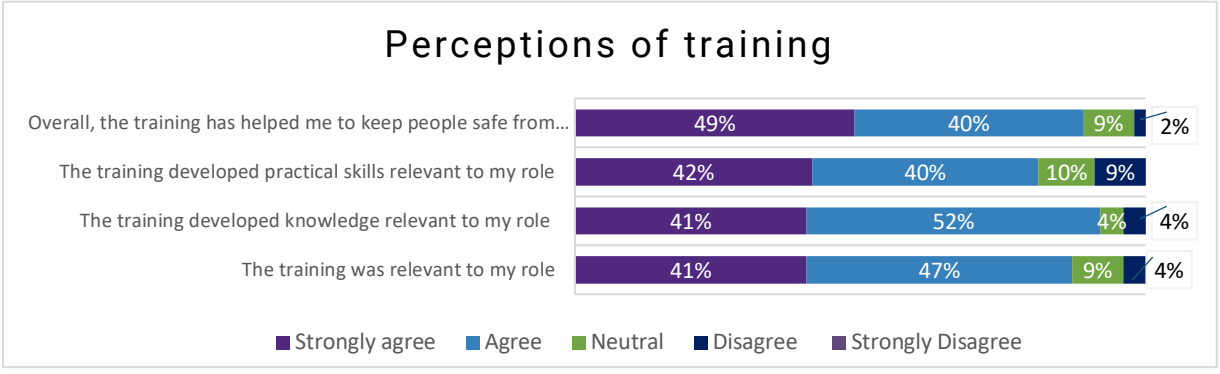
	% of DSLs who had participated in the training…		Views of those participating….		
			believed it was high quality	believed it was good quality	believed it was adequate
National child protection charity	73%		59%	27%	14%
The local authority	60%		51%	37%	12%
LSCB/Local Safeguarding Partnerships	56%		62%	29%	9%
A private training company specialising in safeguarding	48%		46%	46%	8%
A freelance consultant specialising in safeguarding	40%		63%	31%	6%
Local Council for Voluntary Service (or equivalent)	30%		54%	29%	17%
National adult safeguarding charity	21%		47%	24%	29%
Local Adult Safeguarding Board	20%		38%	63%	0%
National youth organisation	19%		53%	40%	7%
Other national charity	17%		14%	79%	7%
Regional Youth Work unit or regional youth work body	12%		60%	30%	10%
More caution should be taken in perceptions of quality for those with fewer participants due to limited sample size.					

Most DSLs think training is broadly relevant

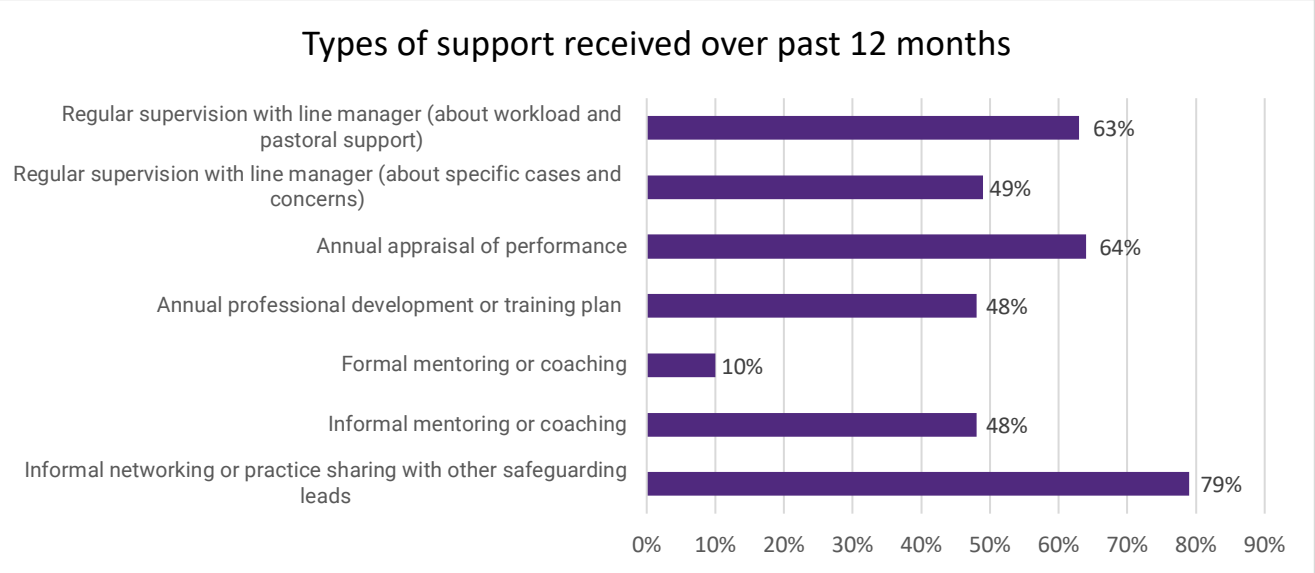
Nearly 9 out of 10 DSLs (89%) found that safeguarding training had helped them keep people safe from harm. There was strong perceptions that the training was relevant, developed knowledge and skills.

Interviews brought to life the significant variety of training available. There was a perception that much of the training available is very similar and fairly rudimentary and basic with an overview of laws and reporting procedures.

> *"The training was fine but there was nothing that said, Okay, so you've got to be a designated safeguarding lead. Now, this is what you've got to do. And this is what you've got to be responsible for. And this is what it means. And this is what you've got to think about. Nothing that took you through that."*



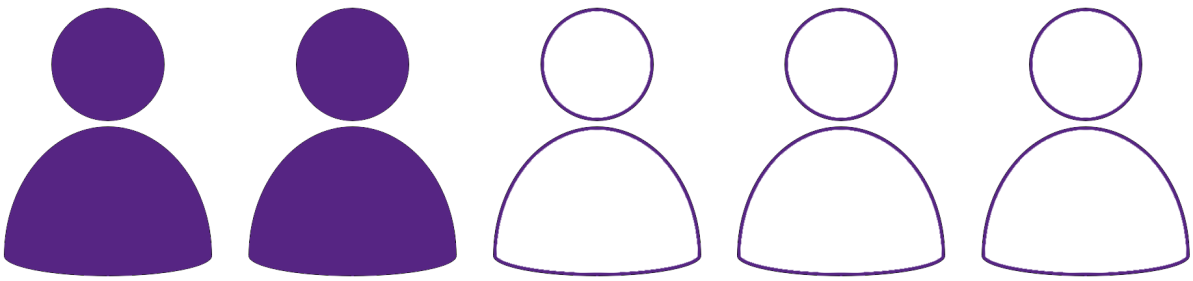
DSLs receive low levels of formal support and supervision



Current support arrangements for DSLs varies significantly. Only 63% receive regular supervision with their line manager about workload and pastoral support; this falls to 49% of DSLs which receive supervision about specific cases and concerns. Unsurprisingly, only about half of DSLs feel that they receive supervisions of the frequency they need or which enables them to manage their workloads.
More than a third (36%) do not receive an annual appraisal of their performance and less than half (48%) have an annual development or training plan.

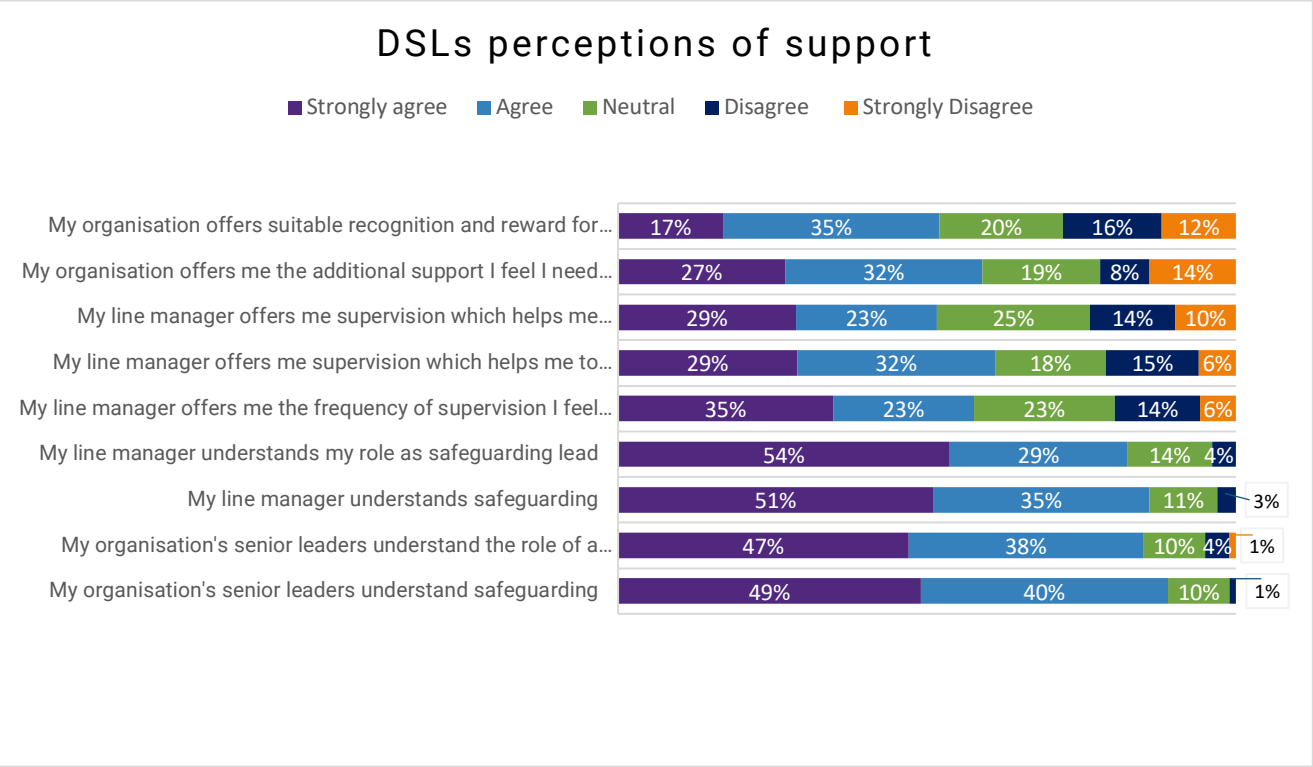
Nearly 2 out of 5 DSLs do not receive regular supervision with their line manager

> *"It makes it extraordinary difficult, because the absence of stuff to work from makes it feel like you're making it up on the spot and makes it look like you're making it making it up on the spot, with the exception of the really, really obvious"*



Many DSLs do not receive reflective support

Worryingly, just a quarter of DSLs (24%) receive supervision which helps them to reflect on their practice and one in five DSLs (22%) disagree that their organisation offers additional support they feel they needed (for example counselling).



The most common form of support received in past 12 months was informal networking with other DSLs. Whilst this may reflect to a degree respondents may have had a connection with the NSYF; there is clearly ongoing peer support between DSLs.

> *"The first line of defence you have is an ad hoc collective group of individuals who engage or don't engage at strategic level with a myriad of unknown consultants with unknown experience and knowledge propagating safeguarding. So your first real implementation team are the DSLs. And they're woefully inadequately supported, and trained to do what they need to do. And that's, I believe, is why we're getting major burnout. So many people are leaving, because they just, it's they're being squished from above and from below and, and it's a rubbing point"*

But the majority of DSLs are members of informal safeguarding groups

Whilst membership of associated professional bodies is low; 80% are member of at least one informal networking group. In total, 67% are member of one group and 13% are member of two or more groups. Membership does reflect recruitment avenues with 27% stating they are members of the NSYF and 16% of the Third Sector Safeguarding Network. Other common informal networks mentioned include groups run by law firms with safeguarding teams (Bates Wells and Farrar); the National Safeguarding Adults Network; the Designated Leads Forum hosted by Save the Children (drawing together DSLs of several national charities) and the NSPCC Child Protection in Sport Unit Leads Officer Support Group.

> *I have joined lots of like communities of practice groups, and the safeguarding forums, and I found those really reassuring. I found that people were experiencing similar things. I was not feeling like "Oh, my God, our service is the most unsafe service I've ever" you know! Really being able to kind of trust that you are making decisions that are safe and sensible that's really helped.*

> *"What we've discovered [by coming to the Forum] is that purely by providing a space there where we can all come and we all acknowledge that we don't know when we need to learn and grow together. An informal mentoring programme has actually set itself up underneath the forum, which we didn't even know."*

10. The impacts of the Covid-19 pandemic on DSLs

"What we are noticing is that there is this drive to get services up and running as fast as we possibly can. Yes, it's all being done in line with government guidance. But I believe and I've said it before, but I'll just say it as if it's just me, I believe we are taking risks that we previously have never taken before. And I don't want to say we're cutting corners, but I just think we are taking chances that we're just not there before."

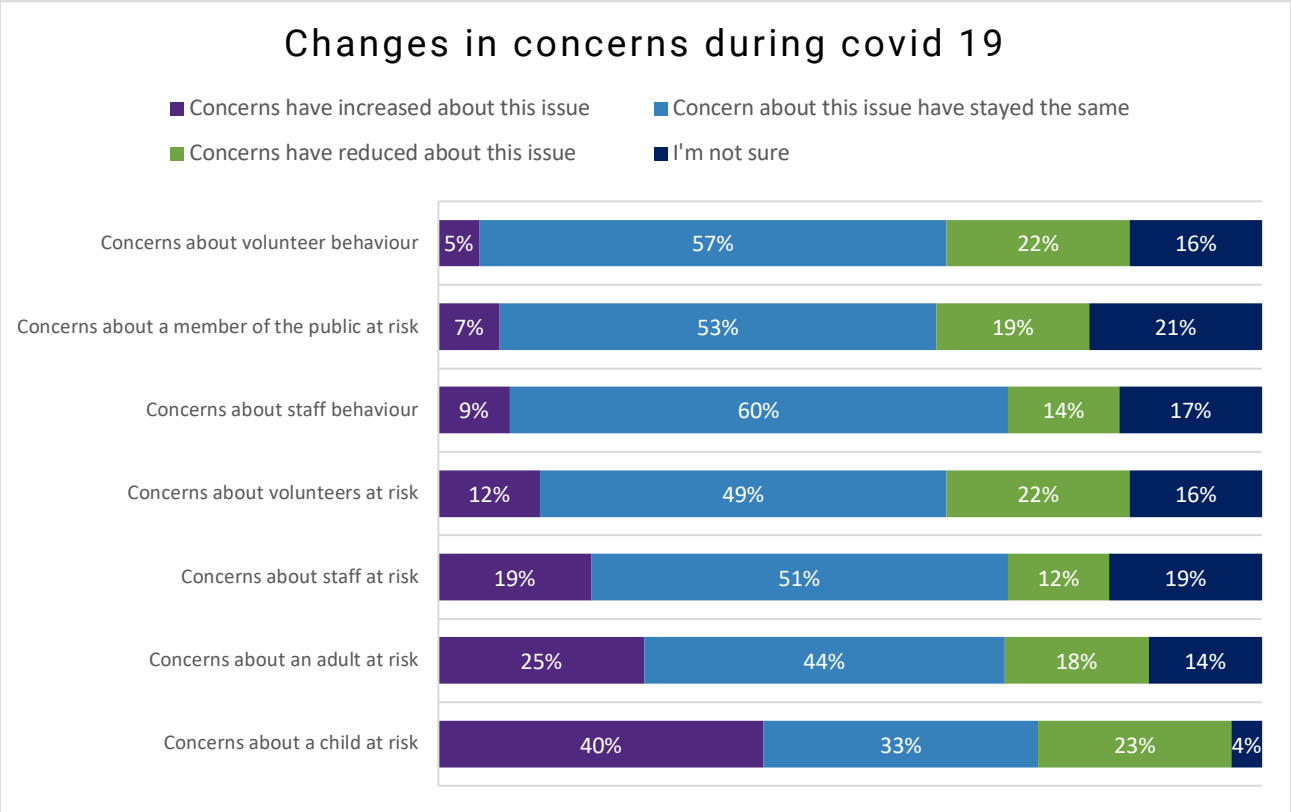
An increase in welfare concerns about children

On the whole, the number of safeguarding concerns raised has stayed the same since the March 2020 lockdown for most DSLs. The exception was with concerns about children at risk increased in the period.

Given the broad drop that for most, other concerns stayed the same; more were likely to say that safeguarding concerns increased for adults and for their staff at risk of harm than decreased. In contrast, more were likely to state that concerns about volunteers at risk of harm, of staff and volunteer behaviour and members of public declined in the period.

In interviews, most found that for many the frequency of contact with young people has decreased so the opportunity to identity concerns or offer support has decreased. Where concerns has increased the volume was driven primarily by welfare concerns about children; especially concerns about mental health issues or families needing support as they adapted to lockdown and reduced service provision – from the organisation themselves or other providers.

These trends match evidence on referrals to local authorities. The most recent data from the Department for Education found that the total number of referrals to children's social care services reported from April 2020 to Jan 2021 is around 10% lower than an average of the same weeks during 2017-20. [125]



[125] Department for Education (2021) Vulnerable Children and Young People Survey: Summary of returns Waves 1 to 19 March 2021

We are not getting any concerns reported to us, or very few. We suspect there will be latent demand but Zoom is not facilitating young people talking.

Our referrals have decreased as activities have stopped. However there has been several concerns about adult volunteers and associations to people at risk that have come through to us.

Most of our delivery of the youth programme has been curtailed since lockdown. As a lot of our work is through schools this has pretty much stopped completely. and work thorough other youth organisations has been severely reduced.

Many more issues around online safety and lack of supervision for young people when online or out in the community during COVID restrictions.

More concerns around anxiety of leaders and their inability to engage with known CYP in difficult circumstances; mental health and increase in overall vulnerabilities

We saw a massive decrease in safeguarding concerns being reported to staff by young people during lockdown as our centre had to close for a face to face offer.

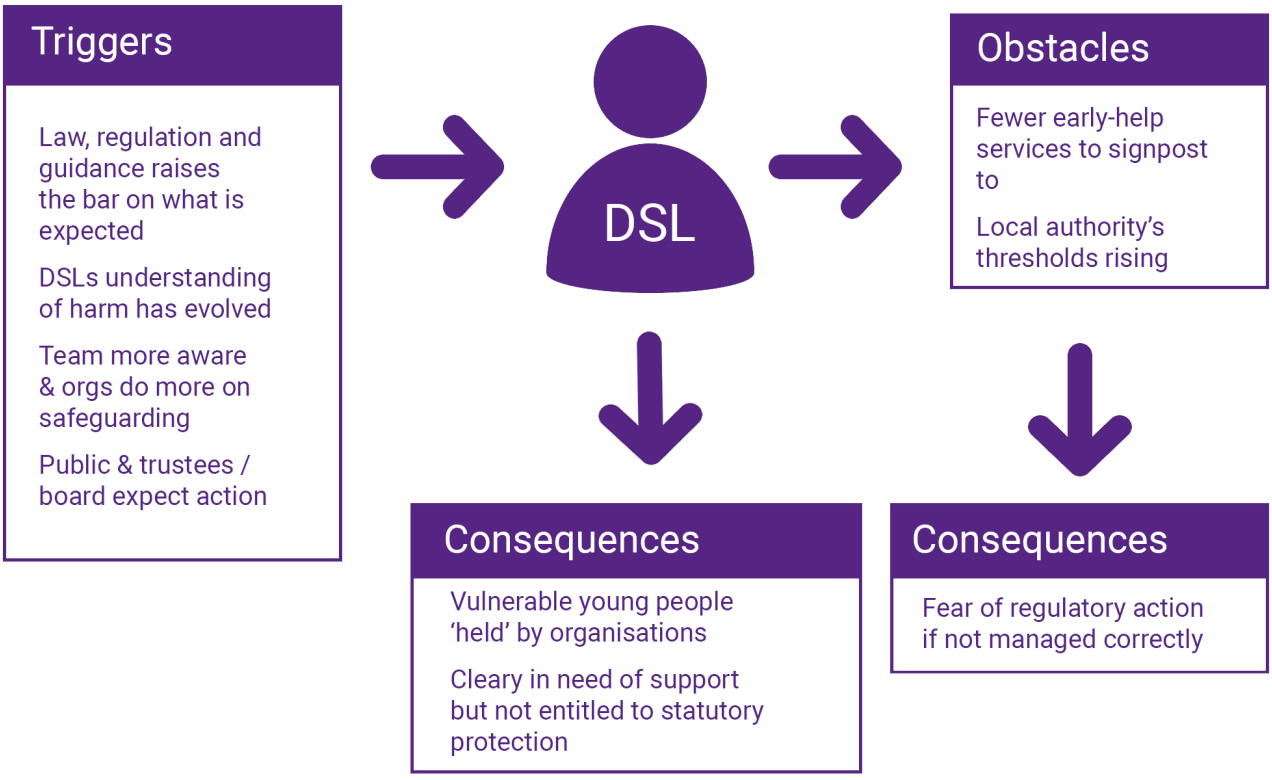
Challenges to support staff and volunteers working remotely

In interviews, many DSLs noted how the changes in ways of working has significantly impacted how they could support other staff and volunteers. Many staff have requested additional support to redesign projects, manage online safeguarding risks and to consider how to respond to the issues young people have been experiencing; especially during lockdown periods. The increase in concerns about the welfare of young people, poor experiences of mental health and, for some, issues of self-neglect has been challenging to respond to remotely. Indeed, for many DSLs they had to find new ways of working out of the office; in particular having to manage confidentiality when also sharing workspaces with family members.

11. Conclusions

Keeping people young people safe from harm is not inevitable. Laws have been passed to offer protection from harm and to direct organisations to act to prevent harm. Guidance is issued and policies are developed setting expectations for implementation. In youth organisations across the country action is taken every day to proactively prevent harm: training is delivered, background checks are made and risk assessments completed. Youth organisations are the port of call for many who are facing abuse, neglect and exploitation. For young people – and for staff, volunteers and other community members – youth work organisations can offer spaces and services which help them seek support and help.

The lynchpin in these organisations efforts to keep people safe is the Designated Safeguarding Lead (DSL). The in-house champion for safeguarding who sets the direction for action and will lead support to those who have been harmed. They are a critical part of the team to ensure that young people facing abuse, neglect and exploitation are kept in sight. Yet, without the right support for the DSL, safeguarding systems are weakened.



Many DSLs are increasingly stuck in the middle with rising expectations for action whilst local statutory services strained to act. DSLs engaged in this project reported increasing 'welfare' case loads with young people known to be in difficult circumstances but not entitled – or not receiving - statutory protection services. Whereas once upon a time they were purely a conduit for referrals to statutory services; often they must be a strategic operator proactively preventing harm and managing larger number of welfare concerns. This requires developing a broader base of skills and knowledge.

Smaller scale organisation

- Some preventative work - policies and procedures
- Leaders expect them to lead concerns but limited engagement in governance
- Leads concerns but serious issues not common
- Infrequent concerns but serious issues not common
- Directly delivers training

Large scale or small but 'higher risk' organisations

- Significant preventative work - policies and procedures
- High levels of independence but also accountability - report to CEO & board
- Leads multiple and complex concerns
- Frequent referrals to statutory agencies and regulators
- Coordinates wider training programming

Within these broad trends, the project has highlighted that whilst current regulation and guidance describe one form of DSL; the changes in the context and the complexity of harm which young people experience is leading to a wider variety in DSLs experience. Consideration should be given to flexing the training, support and development pathways for DSLs to recognise the significant variation in organisational size.

Options for future development

1. The wider regulatory environment

The role has evolved and changed significantly in recent years. Whilst there is a need for regulation and much of the recent developments have positively raised the bar of action and likely aided keeping people safe; DSLs face an increasingly complex environment with requirements spanning across multiple overlapping regulatory regimes. The piecemeal reforms and expectations should be harmonised, simplified and gaps in regulation filled. DSLs should have access to a clear and coherent set of requirements for safeguarding in their organisation. More importantly, children, adults at risk and others working with organisation should have clarity on their entitlements from proactive protection from harm.

Options to consider include:

- The current requirements on organisations safeguarding should be harmonised across different statutory provisions. For example, expectations on organisations in Chapter 2 of Working Together to Safeguard Children and the Charity Commission expectations on trustees should be aligned.

- Currently most legal expectations for safeguarding is focussed on individuals under 18. Whilst the Care Act 2014 put in place duties for local authorities to investigate concerns; there remains no proactive duties on many public bodies to consider safeguarding adults at risk of harm. The forthcoming Health and Care Bill should introduce a parallel duty to the Children Act 2004 requirements on a range of public bodies to make arrangements for safeguarding and promoting the welfare of children in relation to adults at risk of harm. Statutory guidance should be issued as a parallel to Chapter 2 of Working Together to Safeguard Children detailing minimum expectations of organisations effective safeguarding activity.

- The forthcoming Online Harms Bill should include explicit requirements on any organisation offering digital interaction with children and adults at risk of harm to make arrangements for ensuring that the activity is discharged having regard to the need to safeguard and promote the welfare of children and adults at risk of harm.

- There should be increased transparency on information on safeguarding. For example, more details should be published of incidents raised with the Charity Commission; number of charities by categories with safeguarding policies as indicated on annual returns to the Charity Commission; the number and form of referrals to the Disclosure and Barring Service.

2. Reviewing the wider DSL role

The role of DSLs has evolved like much of safeguarding law: piecemeal, in part and varying overtime. Currently there is no expectations on the specific responsibilities of DSLs and the definition of the role varies between different statutory guidance. Whilst there are detailed requirements set out in Keeping Children Safe in Education there is no expectations outside of schools or colleges. The Government should consult more widely on reforming the DSL role. This should consider how to bring clarity on the responsibilities of the DSL role, the support they should have, who is suitable to undertake the role and their behaviours in the role.

Options to consider include:

- Whether there should be increased detailed regulation to ensure that individuals undertaking the role have sufficient time, training, support and independence to fulfil the functions to keep people safe from harm. For example, the current regulatory regime for Data Protection Officers or 'competent persons' under health & safety regulations.
- Ensuring that the DSL role is eligible for an enhanced with barred list Disclosure and Barring Service check.
- Ensuring that the DSL roles is considered a 'position of trust' in law
- Ensuring that volunteer DSLs have full legal protection from detriment when they whistle blow in the public interest

3. Supporting statutory agencies to work with DSLs and fulfil their responsibilities

Whilst DSLs are often at the front line of identifying or hearing concerns about children and adults at risk of harm; they must work closely and collaboratively with a range of other agencies to ensure that people are protected, receive the support they are entitled to and need. Currently, it appears there are variable relationships between DSLs and statutory protection agencies. In particular, DSLs report challenges in accessing early help and preventative services or being engaged in formal statutory protection processes.

Options to consider include:

- The Independent Review of Children's Social Care is undertaking a full spectrum review of the children's social care system. It should consider the initial entry points of referral to statutory protection services. Consideration should be taken to building consistency between how local authorities receive safeguarding concerns about young people.
- Further research is needed on the experiences of statutory protection services on receiving safeguarding concerns from, and working with, DSLs.
- Further research to strengthen statutory agencies understanding of the role of youth work organisations and their role in supporting young people and their families.

4. Further embedding equity, diversity & inclusion into the work of DSLs

With an increasingly diverse population of young people with many members of minority groups – whether ethnically, religiously, gender identity and expression or sexual orientation. Recognising that all too often minority group members can experience discrimination, prejudice and poorer outcomes; DSLs must be conscious of disrupting existing power structures and challenge ways of working which further entrench unfairness.

There is currently little support available for DSLs to develop knowledge, skills and wider competencies which enable with them to effectively engage with a diverse range of young people and, where necessary and appropriate, their wider families or peers. There is limited support to develop culturally sensitive and reflective approaches to safeguarding which recognise and navigate the power imbalances - structurally, institutionally, and inter-personally – that young people at risk of harm may experience.

Options to consider include:

- Building further evidence on the diversity of those working as DSLs and consider barriers to entry for workers from minority groups.
- Development of training, guidance and tools which support culturally competent and intersectional safeguarding practices with young people.
- Sharing evidence to DSLs of the experiences of young people from minority groups in statutory protection services; enabling DSLs to be better able to identify and challenge potential unequal treatment.

5. Developing a competency and training framework

There is no shared, sector-wide articulation as to the required knowledge, skills and competencies that DSLs need to perform their role effectively. This leads to challenges for youth organisations with no benchmark of what to look for in a DSL. It creates barriers for statutory agencies engaging with a DSL who would encounter significant variation in knowledge, skills and experiences for the role.

The lack of frameworks for the competencies for DSLs also impacts the training available. There is a wide variety of different DSL training courses which are available – all with different curricula and coverage of core sets of knowledge and skills. This project has highlighted challenges for DSLs to understand what a good training course looks like. It can make it difficult for differentiating between different training; particularly those geared towards formal school or college settings or health care settings or youth work and non-formal settings.

Options to consider include:

- Development of a national competency framework or occupational standards for DSLs
- Processes for training providers to be able to benchmark or be verified that they cover appropriate knowledge and skills

6. Towards a DSL professional development pathway

Currently there is little codification or accepted pathways for professional development for DSLs. Whilst many larger youth organisations have tiered levels of DSLs; there is no articulation of the progression routes for those with an interest in further developing their practice. For individuals who have been DSLs for a substantive period of time there is little sense of progression apart from moving to a different organisation.

Similarly, for those interested in taking on the responsibilities of a DSL there is no sense of boundary of the role or where experience gained can be developed or where there is opportunities for future development. With many DSLs seemingly falling into the role, an articulated pathway for development may create positive incentives for others to actively choose to take on the responsibility. This would include development of wider materials.

Note, professional does not necessarily mean employed. Many voluntary DSLs will have interest in developing their skill set and contribute to their motivation for continuing volunteering.

Options to consider include:

- Development of a cross-sector narrative on the role of Designated Safeguarding Leads. This should aim to bring awareness of the role, the appropriate boundaries of responsibilities when working in a tiered DSL model and future career progression.
- Development of a formalised professional development pathway; linked to any developed competency and training framework.
- Whether there is appetite to move towards increase codification of the role of DSLs; such as creation of a professional association

7. Providing DSLs with the tools, guidance and support to be effective

It is clear that many DSLs would welcome additional support to fulfil their role effectively. The National Youth Agency is developing a Safeguarding Hub to drive forward resources for the youth sector. This new collaborative effort is needed from across the youth sector and should look to develop a suite of tried and tested, evidence based and effective support tools and draw on the best insights from organisations specialising in child protection and those working with adults at risk.

Options to consider include:

- New tools for managers or supervisors of DSLs; including practical tools to enable reflective practice
- New tools for undertaking proportionate safeguarding due diligence of third-party organisations delivering on behalf of youth organisations or in receipt of funding from youth organisations
- New tools on monitoring and evaluating the effectiveness of safeguarding activity
- Additional guidance on practicalities of managing individual cases (recording and storing information, etc) including how to escalate concerns which do not meet statutory protection services thresholds
- Additional guidance for DSLs in managing the recruitment of ex-offenders – this is particularly needed where youth organisations work with workers/volunteers who use lived experience to inform their practice

8. Empowering young people to influence and direct efforts to keep them safe from harm

A striking finding of the project has been the relatively limited practice of active involvement of children, young people or adults at risk of harm in influencing organisations safeguarding activity. Whilst DSLs engaged report – and current statutory and practice guidance expects – active engagement with individuals when responding to specific safeguarding concerns; few undertake regular participation activity with young people.

Options to consider include:

- Agencies which support DSLs should actively promote the benefits of engaging young people
- Development of new tools to support young people who have been supported by DSLs to have opportunity to feedback on their experience and how DSLs can use this to inform their practice.
- Reviewing safeguarding language to be accessible, meaningful and relevant.
- Exploring and implementing processes to authentically and consistently put young people at the heart of decision making, supported by an organisational approach to collaboration with young people.

9. Building the evidence base on effective safeguarding

This introductory study has sought to highlight the status and work of DSLs. Whilst a contribution to the wider debate on how to enhance keeping people safe from harm; it is inherently based on limited insight. There remains limited evidence as to the work of DSLs.

Options to consider include:

- Regular benchmarking on the size, scale and role of DSLs
- Further research as to what factors enable DSLs to be effective and affect the outcomes experienced by those who have experiences harm or which build knowledge, skills or confidence of their wider organisation to undertake effective safeguarding activity.
- Further research with those supervising or supporting DSLs; including the different experience of nominated Board/trustee leads for safeguarding.
- Further research from survivors of harm of their experiences of engaging with initial safeguarding practitioners and how this helped or not their subsequent journey.

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Registration No. 2912597 | Charity No. 1035804
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