

1625 Independent People

Safeguarding Children and Young People Policy and Procedure

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PART 1: POLICY (Safeguarding)

1. STATEMENT OF PURPOSE

“Ultimately, effective safeguarding of children can only be achieved by putting children at the centre of the system, and by every individual and agency playing their full part, working together to meet the needs of our most vulnerable children”

[Working Together to Safeguard Children, 2018](#)

1.1 Purpose of this Policy:

The overriding purpose of this policy is to meet our statutory duties to

- Safeguard and promote the welfare of children (S.11, [Children Act 2004](#));
- Work within the statutory framework of [Working Together to Safeguard Children, 2018](#) childcare legislation, regulations and guidance.
- For Youth Education Service delivery additionally the [DfE Keeping Children Safe in Education Guidance](#)
- Guide to the supported accommodation regulations -Department for Education, March 2023 [Providing supported accommodation for children and young people - GOV.UK \(www.gov.uk\)](#)

This is further supported through application of The Charity Commission’s Guidance on [Safeguarding duties for trustees](#), which includes:

- Ensuring that we do not cause harm to anyone who has contact with us
- Acknowledging that through working with children or adults at risk we have extra responsibilities, which includes ensuring that all people who come into contact with children are trained appropriately in relation to their role (and receive regular refresher training)
- Undertaking 5 key actions
 - identifying and managing risks
 - having suitable policies and practices in place
 - carrying out necessary checks
 - protecting volunteers and staff (includes raising concerns and whistleblowing)
 - handling and reporting incidents appropriately

1.2 Scope – who this policy and procedure applies to

This Policy applies to the entire organisation: Board members, all colleagues (paid, temporary and permanent), volunteers, those on work experience and student placements – collectively referred to as colleagues throughout - and it also applies to young people themselves.

This policy refers to all young people within Independent People’s services under 18 years. If the person colleagues are concerned about is aged over 18 years, they must refer to Independent People’s ***Safeguarding Adults Policy and Procedure***.

1.3 Definitions

- For the purposes of this document the terms “**children**”, “**service user**” and “**young people**” are interchangeable.

A child is anyone who has not yet reached their 18th birthday (Children Acts 1989 and 2004). That a child has reached 16 years and is living independently does not change their status or entitlement to services or protection under these Acts.

Safeguarding and promoting the welfare of children is usually proactive and preventative and is defined ([Working Together to Safeguard Children, 2018](#)) as:

- Protecting children from maltreatment
- Preventing impairment of children’s health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
- Taking action to enable all children to have the best outcomes.
- **Child Protection** is part of safeguarding and promoting welfare is defined as the activity taken to respond to an incident or variety of issues where there are concerns or allegations of abuse to protect specific children and young people who are suffering or are likely to suffer significant harm.
- **Online abuse** is any type of abuse that happens on the internet, facilitated through technology like computers, tablets, mobile phones and other internet-enabled devices (Department for Education, 2018).

2 EQUALITY STATEMENT

1625IP aims to design and implement policy documents that meet the diverse needs of our young people and colleagues, ensuring that none are placed at a disadvantage over others. It considers the provisions of the Equality Act 2010 (including the Public Sector Equality duty) and advances equal opportunities for all.

This document has been Equality Impact Assessed (EQIA) to ensure that no one receives less favourable treatment on the protected characteristics of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex (gender) or sexual orientation.

In carrying out its functions, 1625IP has due regard to the different needs of different protected equality groups in their area. This applies to all the activities for which 1625IP is responsible, including policy development, review, and implementation.

3 STATEMENT OF COMMITMENT

Independent People commits to

- Upholding the welfare of the child as paramount (Children Act 1989).
- Ensuring Independent People take a child-centred approach.

- That all children whatever their age, culture, disability, mental health, gender, language, racial origin, religious beliefs, gender identity, sexual identity and/or care experience have the right to be protected from harm and no child should receive an inferior response to safeguarding concerns based on any these characteristics due to misunderstandings (for example cultural or religious factors leading to a permissiveness of abuse). This Policy and Procedure must be read alongside Independent People's ***Equity, Diversity, and Inclusion policy***.
- 1625IP recognises that it is possible that there may be unique safeguarding considerations in relation to children identified in any single category listed above. We also take an intersectional approach to safeguarding, as young people who have diverse identities may be more vulnerable and face more complex safeguarding risks as a result.

In all our work Independent People will take into consideration the sensitive issues that may arise when working with people of differing 'characteristics' or those where intersectionality is relevant.

- Recognising and supporting the value and importance to young people of appropriate and safe relationships with family, friends, and other people who are important to them; supporting young people to recognise and expect appropriate and safe relationships, to be able to form trusting relationships, and to know what to do when a relationship does not feel safe or appropriate
- All children having a right to protection from abuse of all types and to expect that adults in positions of responsibility will do everything in their power to foster these rights.
- Keeping children and young people safe online and on other virtual platforms, promoting an understanding of the potential risks and encouraging safe and responsible use of the internet. Please refer to Independent People's ***Online Safety Policy*** and [Appendix 6](#).
- Working proactively at every level of the organisation to safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced, ensuring there are clear lines of accountability.
- Ensuring that all colleagues and volunteers are comprehensively trained to understand and be alert to the signs of abuse and neglect and know how to act on concerns about the welfare of a child or young person.
- Ensuring all colleagues and volunteers have appropriate reflective supervision and support so they are aware of and competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- Protecting children and young people from abuse, and where abuse is identified, ensuring that that action is taken swiftly in line with our Child Protection procedures ([Part 2](#) of this document) and the [South West Child Protection Procedures](#).
- Ensuring that all suspicions and allegations of abuse are taken seriously, responded to swiftly and appropriately and understood from the viewpoint of the victim.
- Cooperating with local authorities, the police, other involved agencies, and families to promote the wellbeing of children, ensuring cooperation is effective at all levels of the organisation, from strategic level through to operational delivery.
- Ensuring we give every assistance to local authority children and young peoples' departments in carrying out their statutory child protection duties.
- Participating in all local authority statutory safeguarding audits and enacting agreed action plans.

- Maintaining a strategic safeguarding plan and conducting annual internal safeguarding audits to test that our practice is robust, transferring any identified improvements into the strategic plan for action.
- Ensuring colleagues work alongside other professionals, on a multidisciplinary basis, to promote good practice and effectively safeguard and promote the welfare of children.
- Maintaining partnerships to help keep children and young people safe online and working with our young people and Independent People Ambassadors Board to ensure that the organisation and young people are adequately equipped to understand, identify, and mitigate the risks of new technology and the safe use of the internet and social media.
- Ensuring that children and young people receiving Independent People services are aware of our commitment to safeguarding and our responsibilities, know how to share concerns and have clear access to trusted individuals independent of the organisation.
- Ensuring that all computers owned by Independent People provided to colleagues and provided within our premises for young people have desktop icons which provide direct access to the [South West Child Protection Procedures](#).

That all colleagues:

- Are aware of their responsibilities for safeguarding and promoting the welfare of children and of their responsibility to report concerns to the relevant manager.
- Are conversant with this Policy and Procedure and the [South West Child Protection Procedures](#) and that they understand the mandatory nature of the above procedures.
- Are aware of the broader related policy framework relevant to safeguarding, including, but not limited to
 - *Safeguarding Adults*
 - *Online Safety*
 - *Photography, Filming and Audio Recording (and associated consent procedure)*
 - *Code of Conduct*
 - *Feedback policy and procedure (previously called Complaints)*
 - *Concerns at Work (whistleblowing)*
 - *Disclosure Checks*
 - *Data Protection in Operation*
 - *Domestic Violence and Abuse (Young People)*
 - *Equity, Diversity, and Inclusion*
 - *Safe Recruitment practices (Recruitment Policy)*
 - *Racial Harassment and Hate Crime*
 - *Anti-Harassment (including sexual harassment) and Bullying (young people)*
 - *Property, Money, and Valuables (young people)*
 - *Suicide and Self-injury guidance*
 - *Ofsted registration requirements (where applicable) and the duty to report to Accommodating Authority and Ofsted – please contact Registered Service Manager or Nominated Individual for more information*
- Have access to clear guidance about how Independent People will handle incidents of actual or suspected child abuse.
- Consult with and refer to relevant local authority departments where concerns about possible significant harm to children arise.

- Have access to advice and support from line managers through supervision and outside of supervision, as required, in safeguarding cases.
- Take all suspicions and allegations of abuse seriously, respond swiftly and understand the viewpoint of the victim.
- Are clear on when they should consult colleagues, line managers, designated leads, and statutory authorities about any concerns they may have about a child or young person,
- Are aware that no single professional can have a full picture of a child's needs and circumstances and that, if children and families are to receive the right help at the right time, everyone who encounters them has a role to play in identifying concerns, sharing information, and taking prompt action.

It is also incumbent upon our colleagues to not only have regard to their duties in relation to the children and young people they encounter through their work, but to also be vigilant about identifying and responding to child safeguarding issues in all areas of their lives.

Additionally for colleagues in the Youth Education Service and those who manage them are aware of their extra responsibilities laid out in the [DfE Keeping Children Safe in Education guidance](#) and section 175 of [Education Act 2002](#) .

3.1 Duty re Radicalisation and terrorism

Independent People recognise our responsibility to incorporate the [Counter-Terrorism and Security Act 2015](#) and the [UK CONTEST Strategy for countering terrorism](#) into our policies and procedures, in order to:

- Undertake our duties in preventing radicalisation and the process of drawing people into terrorism and terrorism related activities
- Ensure that they are given appropriate advice and support, and to work with and/or report to 'specified authorities' where people may be at risk of radicalisation.

Our responsibilities sit under 'Prevent' statutory duty through [HM Government Prevent 2022 programme](#) - a national safeguarding programme that supports people who are at risk of becoming involved with terrorism through radicalisation.

Vulnerable people, such as the young people we work with, can be a target for radicalisation and colleagues need to understand the risks involved and be trained to:

- Understand the legal basis for our involvement and their role in addressing risk
- Be able to use professional judgment to recognise the vulnerable individuals who may need support to be diverted from what could be considered to be linked to terrorist activity, with reference to the Channel early intervention programme and any local context
- Be aware of the local safeguarding and referral mechanisms, agencies and/or people to contact for further specialist help, support, and advice.

Independent People commit to

- Have designated 'Prevent' lead manager(s) to act as points of contact within the organisation, who are trained to deliver workshops to frontline colleagues

- Raising awareness of 'Prevent' within the organisation, to ensure all colleagues understand the local risk of vulnerable children and young people being drawn into terrorism and know how to refer individuals of concern for specialist support and help.

All colleagues should refer to the Act Early website [Act Early](#) and refer the case to the Designated Senior Manager if they are concerned about a young person showing signs of radicalisation.

4 DEFINITIONS OF HARM

Definitions unless otherwise stated from Appendix A of [Working Together to Safeguard Children, 2018](#)

4.1 Abuse and neglect

Abuse and neglect are forms of maltreatment of a child and can happen by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger, for example, via the internet. They may be abused by an adult or adults, or another child or children.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone. It may:

- involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- feature age or developmentally inappropriate expectations being imposed - these may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- involve seeing or hearing the ill-treatment of another
- involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care givers); or ensure access to appropriate medical care or treatment
- meet or respond to a child's basic emotional needs.

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

Sexual Abuse involves forcing or enticing a child to take part in sexual activities, (not necessarily involving a high level of violence), whether or not the child is aware of what is happening. The activities may involve or include:

- physical contact, including assault by penetration (e.g., rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women also commit acts of sexual abuse, as can other children.

Discriminatory abuse is described in the [Care and Support Statutory Guidance](#) in terms of 'forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, religion' (Section 14.17). Discriminatory abuse is a category within the safeguarding policy referring to forms of abuse motivated by prejudice or bias, including against those who have [protected characteristics](#). A very similar definition is used by the [Safeguarding Adults Collection](#) (which is the basis for data collection) who add that discriminatory abuse also links with [hate crime or mate crime](#). However, discrimination may be a feature or dimension of any other form of abuse (e.g., neglect arising from ageist attitudes or financial abuse due to homophobic views).

There is a low rate of reporting of discriminatory abuse

- Less than 1 per cent of the 149,540 Section 42 safeguarding enquiries raised in 2020/21 were linked to Discriminatory Abuse
- Only two of the 399 Safeguarding Adults Reviews from 2017-19 were completed under the category of Discriminatory Abuse
- Rates of reported disability hate crime – an allied form of abuse – have increased in recent years. A total of 9,208 disability hate crimes were reported in 2020/21 (an increase of 9 per cent on the year before and an increase of 449 per cent since 2012)

Information from the Local Government Association (see [Discriminatory abuse: a briefing for practitioners | Local Government Association](#) for links to research)

Research indicates that low reporting may link with low recognition of discrimination in practice; reasons include

- Discrimination includes slurs and harassment based on protected characteristics, but broader societal issues also make discriminatory abuse more likely, due to widening societal inequalities.
- Discrimination may not be recognised as abuse 'in its own right', because it manifests itself alongside / within other abuse types. As a result, the dynamics of discriminatory motives may be less recognisable than the abusive acts that are experienced, (an assault motivated by racism or homophobia may be seen as physical abuse because discriminatory motivations are difficult to identify).
- Discrimination links with protected characteristics, so fears of stigmatisation or feelings of shame may prevent people from reporting this form of abuse

- Discrimination is commonplace in society, and some people experience forms of discrimination on an everyday basis. Therefore, abuse may be normalised or difficult to distinguish from everyday experience, leading to low reporting
- Dealing with discriminatory abuse through one-off interventions may not be effective, follow-up/preventative work regarding the potential for repeat incidences are crucial. This is because protected characteristics are usually a static factor, and the person may be targeted in a patterned way, so may remain at further risk in the community

Emerging messages for practice

Further work is underway to explore the implications for practice in more detail. This work is being led by the 'Care and Health Improvement Programme' (CHIP), the charity Research in Practice and Royal Holloway, University of London. However, several messages have emerged for practitioners from this initial literature review:

- How do you identify if a person participating in a safeguarding enquiry has protected characteristics? Some of these may be visible, but others such as religion, disability, or sexual orientation, may be hidden or unknown.
- Actively consider that people may have multiple protected characteristics, for example, a 17-year old person from a Black, Asian, or other minoritised ethnic background who is also a gay woman with disabilities. An intersectional approach that appreciates the interaction between these characteristics is therefore essential.
- When undertaking safeguarding work with a person who has protected characteristics, it is important to sensitively identify, in partnership with the person experiencing abuse or neglect, what significance these protected characteristics may have in terms of the motivation for abuse, everyday experiences of discrimination and future risk of abuse or barriers to safety, recovery, leading a fulfilled life and overall wellbeing.
- Differences related to protected characteristics may mean that adverse experiences are more difficult to talk about or identify due to shame, stigma, language barriers or a mistrust of statutory services. Specialist, culturally specific or local voluntary sector services can be important here. This includes services offering advocacy and peer support, which should enable a person-centred and sensitive approach, that people may find more accessible.
- Taking an inclusive approach to how discrimination manifests itself is important. Although people may experience overt and interpersonal examples of discrimination, such as the slurs or harassment mentioned in the statutory guidance, more subtle examples may occur. For example, an absence of culturally appropriate meals in a formal care setting, may indicate a lack of care about the person's needs based on ethnicity, religion, culture practice and ideological beliefs, which may be underpinned by institutional racism.
- 'Othering' attitudes, which seek to distance people who do not fit an assumed societal norm (such as those with protected characteristics) can be prevalent or normalised in organisations. Paying attention to this, discussing it in teams, through supervision or other forums is important.
- Consider how discrimination is nested within social contexts. For example, poor neighbourhood safety, poor housing or poverty may mean that people with protected characteristics do not feel able to participate or access their community safely.
- 'Making Safeguarding Personal' emphasises a person-led approach, and this can provide a vehicle for effective work with people who have protected characteristics and experience forms of abuse or neglect, where discrimination may have motivated this. This should be culturally informed, affirmative, and respectful of people's protected characteristics

4.2 Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse.

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact; it can also occur using technology.

What marks out sexual exploitation from other forms of child sexual abuse is the presence of some form of exchange, for the victim and/or perpetrator or facilitator.

It is critical to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a child/young person does not make them any less of a victim. It is also important to note that the prevention of something negative happening can also fulfil the requirement for exchange.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

Independent People works with vulnerable children and young people and must be alert to potential sexual exploitation. Those at risk of homelessness, who are care experienced and in supported housing are often the focus of perpetrators of sexual abuse. Some children and young people are particularly vulnerable, for example, children in care and leaving care, migrant children, unaccompanied asylum-seeking children (UASC), children with special needs and those involved in gangs or victims of forced marriage.

Children and young people can be exploited by men and women of all ages and all ethnic backgrounds. Exploitation can also happen from people they are close to / already in a relationship with.

Due to the nature of the grooming methods used, it is very common for children and young people who are sexually exploited not to recognise that they are being abused.

Our colleagues must carefully consider issues around consent and refer to relevant guidance and resources to understand consent and what other factors might influence the ability of a person to give consent. Children under the age of 16 cannot legally consent to sexual activity. A child under 18 cannot consent to their own abuse through exploitation.

4.3 Female Genital Mutilation (FGM)

FGM is a procedure where the female genital organs are deliberately cut, injured, or changed and there is no medical reason for this. It is frequently a very traumatic and violent act and can cause harm in many ways. The practice can cause severe pain, and there may be immediate and/or long-term health consequences, including pain and infection, mental health problems, difficulties in childbirth and/or death [2021 definition from: [South West Child Protection Procedures](#)].

FGM is a criminal offence – it is child abuse and a form of violence against women and girls and is illegal in England and Wales under the [Female Genital Mutilation Act 2003](#). As amended by the [Serious Crime Act 2015](#),

If any of the abuse noted in the sections above are perpetrated by someone who is or has been an intimate partner or family member of the child or young person, the abuse can also be Domestic Abuse. In such cases, colleagues should also refer to Independent People's separate ***Domestic Violence and Abuse Policy (Young People)***.

4.4 Forced marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are pressurised, or abuse is used, to force them to do so. It is recognised in the UK as a form of domestic or child abuse and a serious abuse of human rights [2023 definition from [UK Government: Forced Marriage Guidance](#)].

The pressure put on people to marry against their will may be:

- physical: for example, threats, physical violence, or sexual violence
- emotional and psychological: for example, making someone feel like they are bringing 'shame' on their family.

It differs from an *arranged* marriage, in which both parties consent to the assistance of their parents or a third party in identifying a spouse.

A child who is forced into marriage is likely to suffer significant harm through physical, sexual, or emotional abuse. Forced marriage can have a negative impact on a child's health and development and can also result in sexual violence, including rape. If a child is forced to marry, he or she may be taken abroad for an extended period which could amount to child abduction.

Practitioners should always consider the need for immediate protection, as disclosure of the forced marriage may be the direct consequence of the impending event. Children's Social Care services will liaise with the police to ensure the safety of the victim and any other family members.

Colleagues should be aware of not assuming that forced marriage mostly impacts on females; 20% of forced marriage cases relate to a man¹, and the Government Forced Marriage Unit found that 8% of all forced marriage cases, reported in 2017, involved a victim with some level of learning disabilities; of those victims, 55% were male.²

A forced marriage resource pack is available here [I:\Policies & Procedures\Housing and Support Policies and procedures\Domestic Violence and Abuse \(young people\)\Forced Marriage Resource Pack links March 2023.docx](#)

4.5 County lines

County lines is a form of Child Criminal Exploitation.

¹ Manchester Metropolitan University, 2018

² Forced Marriage Unit, 2017

County lines is a term used to describe the activities of gangs and organised criminal networks who are involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of 'deal line'. Gangs are likely to exploit children and vulnerable adults to move and store drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Vulnerable children and young people are at high risk of significant harm transporting and selling drugs, often many miles from home - some are forced to carry the drugs in harmful ways that are abusive and could result in their death.

Children and young people may be sent to another area of the country to live with a vulnerable adult whose home has been taken over by the gang in exchange for a continued supply of drugs (known as 'cuckooing'). These environments are extremely dangerous for children and young people who face the risk of violence from their exploiters and / or the drug users who have been cuckooed, as well as from an unsafe physical environment featuring toxic substances and used needles. Other dealers in the area may also target them to prevent them taking over their 'patch' - exposing them to the risk of more violence.

County lines activity is dynamic, and perpetrators will change their methods of exploitation quickly. As professionals become more responsive to identifying children and young people at risk, criminals adapt their tactics. This may be by targeting new groups of children or young people to exploit to avoid detection or recruiting within the local area to avoid the risk of them being identified when travelling. As a result, a child or young person who is exploited can leave their home in the morning, sell drugs, and return the same day and so avoid being reported missing.

There are high levels of violence and intimidation linked to county lines activity. Children and young people can be very quickly groomed into criminal activity, often before parents or professionals realise what is happening.

4.6 Child criminal exploitation (CCE)

Currently there is no statutory definition for CCE, however, it is covered within the Modern Slavery Act 2015.

The Home Office defines CCE as occurring where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity:

- in exchange for something the victim needs or wants, and/or
- for the financial or other advantage of the perpetrator or facilitator and/or
- through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Criminal exploitation often happens alongside sexual or other forms of exploitation. It is broader than just county lines and includes for instance children forced to work on cannabis farms, to commit theft, shoplift or pickpocket, or to threaten other young people.

4.7 Domestic abuse

Working Together to Safeguard Children defines domestic abuse as:

- Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.
- Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling, or coercive behaviour, sexual and/or economic abuse.
- Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and adolescent to parent violence.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Domestic abuse continues to be a prevalent risk factor identified through children's social care assessments for children in need. Domestic abuse has a significant impact on children and young people. Children may experience domestic abuse directly, as victims, or indirectly due to the impact the abuse has on others such as the non-abusive parent.

Under the Domestic Abuse Act 2021, children are recognised as victims of domestic abuse, if they see, hear, or experience the effects of the abuse, and are related to the perpetrator of the abuse or the victim of the abuse. Abuse directed towards the child is defined as child abuse.

The Domestic Abuse Act 2021 says that behaviour is 'abusive' if it consists of any of the following:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse
- Psychological, emotional, or other abuse
- and it does not matter whether the behaviour consists of a single incident or a course of conduct.

The Domestic Abuse Act 2021 uses the term 'victim' but not everyone who has experienced, or is experiencing, domestic abuse chooses to describe themselves as a 'victim' and they may prefer another term, for example, 'survivor'.

NB. For our Youth Education Service delivery we are registered with the police notifications scheme and use information from this to conduct risk assessments and risk management plans.

In all such cases, colleagues should also refer to Independent People's separate ***Domestic Violence and Abuse Policy (Young People)***.

4.8 Controlling or coercive behaviour

Also known as coercive control, the use of control and coercion in relationships is a form of domestic abuse and, since December 2015, a criminal offence.

- Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour; and
- Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim Coercive control is a form of abuse that involves multiple behaviours and tactics which reinforce each other and are used to isolate, manipulate and regulate the victim.

This pattern of abuse creates high levels of anxiety and fear. This has a significant impact on children and young people, both directly, as victims, and indirectly due to the impact the abuse has on the non-abusive parent. Children may also be forced to participate in controlling or coercive behaviour towards the parent who is being abused.

4.9 Hate crime

Hate crime is any criminal offence that is motivated by hostility or prejudice based upon the victim's disability, race, religion or belief, sexual orientation, transgender identity. It can take many forms including:

- physical attacks such as physical assault, property damage, offensive graffiti, and arson
- threat of attack including offensive letters, e-mails, abusive or obscene telephone calls, groups hanging around to intimidate and unfounded, malicious complaints
- verbal abuse, insults or harassment, taunting, offensive leaflets and posters, abusive gestures, dumping of rubbish outside homes or through letterboxes, and bullying at school or in the workplace
- the use of electronic media to abuse, insult, taunt or harass.

Someone can be a victim of more than one type of hate crime.

In such cases, colleagues should also refer to Independent People's ***Racial Harassment and Hate Crime Policy***. Hate Crime can be the source of significant harm.

4.10 Radicalisation and extremism

Defined through the Governments 'Prevent Duty' Guidance (see [section 3.1](#) for references) as

- **Radicalisation** is defined as the process by which someone is being encouraged to develop extreme views or beliefs in support of terrorist groups and activities and, in some cases, to then participate in terrorist groups.
- **Extremism** is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Violent extremism is when a person or group uses fear, terror, or violence to try and achieve change and we also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Keeping children and young people safe from these risks is a safeguarding matter and should be approached in the same way as safeguarding children from other risks.

4.11 Significant harm

[Section 47 of the Children Act 1989](#) places the local authority under a duty to make enquiries or cause enquiries to be made, where it has reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. There are no absolute criteria for establishing significant harm.

Sometimes, a single traumatic event may constitute significant harm, e.g., a violent assault, suffocation, or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change, or damage a child's physical and psychological development.

Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical, or sexual abuse that causes impairment to the extent of constituting significant harm. Others may suffer significant harm from seeing or hearing the ill-treatment of another, for example in cases of domestic abuse.

In all cases, to decide whether the child is suffering or is at risk of suffering significant harm, an assessment must examine all relevant factors in the family.

For further information see [Appendix 3](#).

4. 11a Self-injury and suicide ideation

1625IP provides guidance and training relating to self-injury and suicide ideation ([I:\Policies & Procedures\Housing and Support Policies and procedures\Guidance - self-injury](#) and [I:\Policies & Procedures\Housing and Support Policies and procedures\Guidance - suicide](#)); in the guidance documents there are links to a wide range of other resources and organisations.

All occurrences of self-injury or suicide must be reported as incidents on In-Form, shared with PAs, or other involved professionals, and potentially reported to the Accommodating Authority and/or Ofsted depending on the incident meeting the threshold for reporting. Individual safety plans are put in place, where relevant and possible, including liaison with the PA, or social worker, for shared safety management. All incidents are reviewed and signed off by managers and reported annually to Board. Themes and learning drawn from incidents help shape, for example, training, policy reviews, team plans, strategic plans, collaboration, and partnerships, and so on.

4.12 Online or internet abuse

Relates to four primary areas of abuse to children:

- Sharing and production of abusive images of children (although these are not confined to the internet)
- A child or young person being groomed online for the purpose of sexual abuse
- Exposure to pornographic images and other offensive material via the internet; and
- The use of the internet, and in particular social media sites, to engage children in extremist ideologies or to promote gang related violence.

The terms digital and interactive technology covers a range of electronic tools. These are constantly being upgraded and their use has become more widespread as the internet can be easily accessed on mobile / smart phones, laptops, computers, tablets, and games consoles.

Social networking sites are often used by perpetrators as an easy way to access children and young people for sexual abuse. In addition, radical and extremist groups may use social networking to attract children and young people into rigid and narrow ideologies that are intolerant of diversity: this is like the grooming process and exploits the same vulnerabilities.

Internet abuse may also include cyberbullying or online bullying – ***colleagues should also refer to the 1625ip Anti-Harassment (including sexual harassment) and bullying policy and procedure***

4.13 Modern slavery and trafficking

Local authorities are the primary service provider for safeguarding and responding to the needs of a child victim of modern slavery, regardless of their nationality or immigration status.

Whatever form it takes, modern slavery and child trafficking is child abuse and relevant child protection procedures, as set out in [Working Together to Safeguard Children 2018](#), must be followed if modern slavery or trafficking is suspected.

If 1625IP colleagues are at all concerned about the possibility of modern slavery and/or trafficking, a referral must be made to the relevant safeguarding team.

National Referral Mechanism (NRM) – 1625IP cannot refer to this – it is through designated staff at first responder organisations. If the potential victim is under 18, or maybe under 18, an NRM referral must be made – children cannot be referred in using a Duty to Notify (DtN) referral. Child victims do not have to consent to be referred into the NRM and must first be safeguarded and then referred into the NRM process. [National referral mechanism guidance: adult \(England and Wales\) - GOV.UK \(www.gov.uk\)](#)

4.14 Extra-familial harm

Extra-familial harm is the type of harm experienced by children and young people outside their primary carers.

It describes a level of harm which is significant and serious and can have a long term impact on the child's development, well-being, and safety. The risks to young people outside the home vary from robbery on public transport, sexual violence in parks and schools, gang-related violence on the streets, through to online bullying and harassment. There are also some young people who will be directly targeted and recruited because of the amount of time they spend outside of the home, and or because they have additional vulnerabilities.

4.15 Contextual Safeguarding

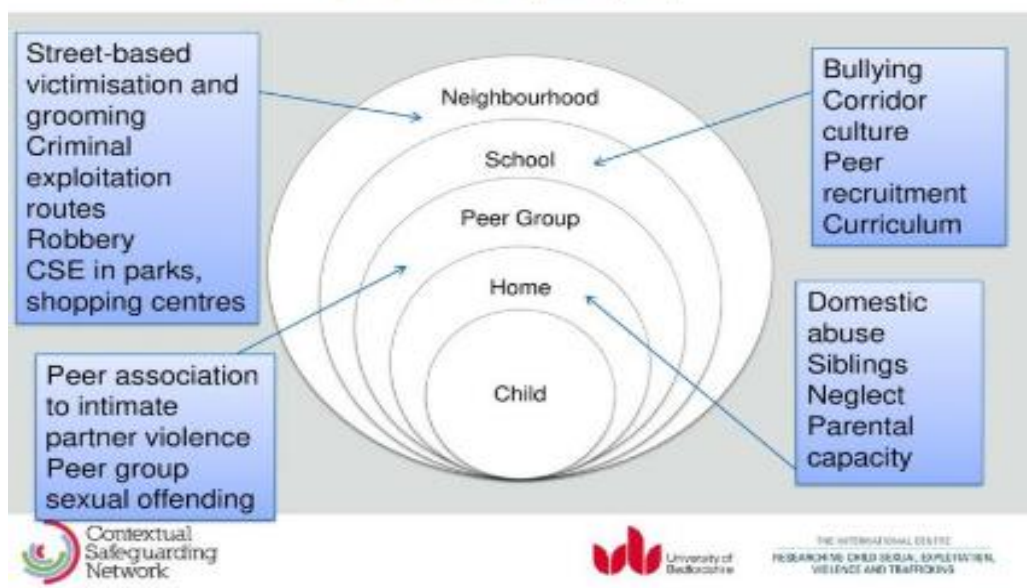
As children move from early childhood into adolescence, they spend increasing amounts of time socialising outside the home.

During this time the nature of young people's schools and neighbourhoods, and the relationships that they form in these settings, inform the extent to which they encounter protection or abuse. A supportive peer group will engender positive relationships, whilst negative ones may lead to violent, coercive, and harmful behaviours. These relationships are, in turn, shaped by, and shape, their school or college, the community and online contexts in which they develop. So, if young people socialise in safe and protective schools and community settings, they will be supported to form safe and protective peer relationships.

Dr Carlene Firmin, (Principal Research Fellow, University of Bedfordshire) in 2015, first proposed the idea of contextual safeguarding, which is not a model, but rather an approach which seeks to create a response to extra-familial forms of abuse, which can:

- Target the contexts in which that abuse occurs
- Provide a framework to address extra-familial risk through the lens of child welfare, as opposed to crime reduction or community safety
- Utilise partnerships between children’s services and those who have a reach into extra-familial contexts (such as schools, transport providers, fast food outlets, youth workers, parks, and recreation services), and
- Measure success with reference to the nature of the context in which harm has been occurring, rather than solely focusing on any behaviour changes of the young person

Contextual dynamics of abuse, vulnerability and risk (Firmin, 2015)



4.15 Transitional Safeguarding

True Transitional safeguarding should not just be about a transfer from child-focused services to adult services when the individual reaches 18, but a true understanding of a person’s lived experience, the impact of this, recovery from adversity and trauma and the needs of the individual rather than through the lens of eligibility criteria of child / adult services.

Abuse and exploitation don’t end at 18 for a child/ young person experiencing abuse or exploitation or having experienced it that the current harm / recovery does not end when they attain the legal status of being an adult.

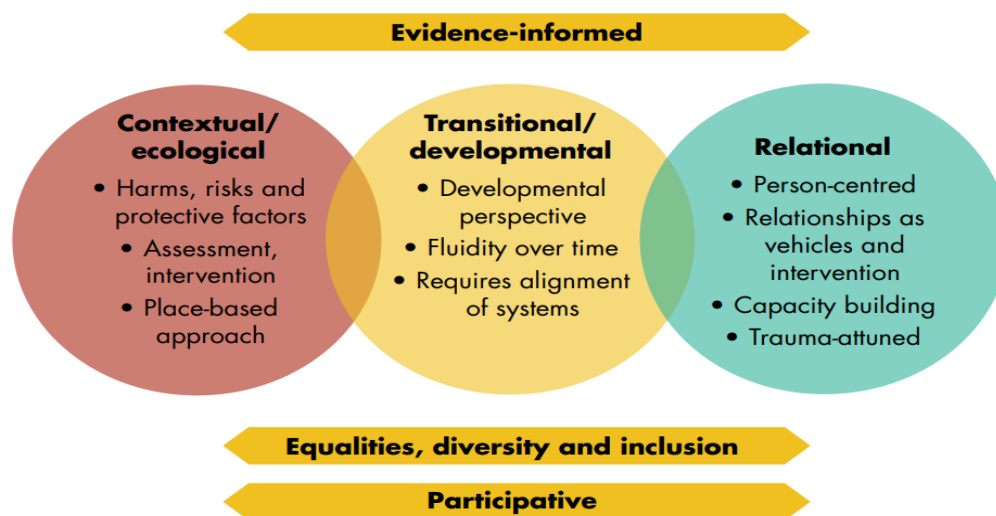
It is key to understand the continued need for young adults to receive support and for 1625IP colleagues to still intervene in situations of harm / exploitation while they cognitively continue to develop, recognising that those that cause harm to young adults will be utilising this period of cognitive development to their advantage. This is because of:

- Trauma and adversity - trauma and adversity can alter brain development and impact on all areas of an individual’s life, relationships, and sense of self. Research has also shown that

a young person's brain continues to develop into their mid-twenties (and potentially a longer time frame for those with multiple disadvantage or multiple trauma and adversity)

- Loss of support - a young person over 18 can suddenly find themselves without support, despite being highly vulnerable. Moreover, the withdrawal of support could potentially increase their vulnerability to perpetrators who feel emboldened by the absence of professional support
- Gaps in current framework recognition - acknowledging that the current framework for safeguarding can cause gaps; in that when a child becomes an adult at 18 if they don't have identified care and support needs (under the Care Act 2014) then the support does not continue post-18. It is, therefore, essential to plan and consider how to ensure support is available within the community for that young adult.

Core principles that allow transitional safeguarding approach.



3 main pillars (contextual, transitional, and relational)

- **Contextual** - this means recognising and responding to the harms young people face in a variety of spaces beyond their family and seeking to make these contexts safer rather than only focusing on the individual
- **Transitional** - this means understanding the distinct developmental needs and strengths of this life stage and creating services and pathways that reflect the individualised nature of transition to adulthood. It encourages greater fluidity between children and adult safeguarding processes and requires an active effort to align systems to create a smoother more holistic offer for people being supported
- **Relational** - this means being person-centred and trauma-informed in practice, recognising that meaningful relationships are an important aspect of any therapeutic support. It requires us to adopt a capacity building and empowering approach, so that young people are supported to build resilience and exercise positive control in their lives. It also means using language that is inclusive and respectful, avoiding terminology or expressions that could be victim-blaming.

Across these 3 pillars, 1625IP colleagues will remain evidence-based, respect inclusion and difference and ensure we are recognising the individual as the expert in the subject of their life and the core participative decision maker; this can be done through:

- Offering support - to internal and external colleagues, developing expertise in areas, sharing professional knowledge, and inviting them to share too. This could also take the form of a reflective or exploratory piece about professional experience and understanding of Transitional Safeguarding
- Using the key principles as a framework - for reflecting on practice with young people, using the support of peers and/or supervisors to explore how practice demonstrates these principles
- Championing the needs of young adults, highlighting where there are identified gaps in service provision or workforce skills so contributing to system change and improvement
- Raising concerns in supervision and/or with managers, workforce development leads and other relevant system leaders
- Promoting mutual support for the emotional and other impacts of working with young people facing risks and harms
- Inviting interdisciplinary colleagues (e.g., from children's services, health, community and voluntary sector, police and lived experience organisations) to discuss the key principles and local priorities for action
- Incorporating transitional safeguarding training
- Offering professional challenge - something 1625IP encourage every day in our multi-agency work, whilst being able to be a critical friend and hold ourselves and other agencies to account - to ensure the right support at the right time for each person. All colleagues should remember there is a multi-agency escalation policy for children and adults.

5 NAMED LEADS FOR SAFEGUARDING

Named Designated Senior Managers for safeguarding within Independent People have been assigned based on their experience and authority to promote and oversee safeguarding practice and to challenge practice where necessary.

All colleagues will be made aware through induction, supervision, and training of how to contact the named leads.

The named Designated Senior Manager is responsible for:

- Supporting managers and workers to recognise the needs of children, including rescue from possible abuse or neglect
- Ensuring policies address the need for accurate, confidential recording, storing, and sharing of information
- Working with statutory and voluntary agencies at both strategic and operational levels to promote good practice in the area of child protection and ensuring that effective partnerships are in place, e.g., in relation to child sexual exploitation and domestic abuse
- Developing a formal link between the local authority partnership boards and our services to promote a clear understanding of accountability and procedures including sharing our policies and procedures with the Local Authority leads
- Overseeing completion of statutory safeguarding audits and associated action planning
- Ensuring that Child Safeguarding Practice Reviews, Rapid Reviews, thematic reviews, etc. are monitored and learning shared and taken from them to improve policy and practice at 1625IP
- Implementing quality assurance processes to ensure the Safeguarding Policy and Procedures contain current references and are understood and followed by all colleagues.

This includes annual audit of:

- Operational delivery - ensuring delivery is in line with this Policy and Procedure
- Safeguarding logs and client files
- Safeguarding induction and training plans for colleagues and volunteers

All learning is transferred into action through a rolling strategic safeguarding plan, monitored through the senior leadership team.

The Designated Safeguarding Board member has leadership responsibility for the organisation's safeguarding arrangements, including:

- Ensuring that Independent People has the systems policies and procedures to safeguard children and young people, colleagues, and the organisation
- Championing safeguarding across Independent People's Board
- Responding to any allegations against senior colleagues.

Deputy Designated Leads

Deputies are in place for each Designated Lead at Senior Leadership Team and Board level, should the lead not be available.

The Senior Operations Team is responsible for ensuring cases are being managed, addressed, and reviewed.

Names and contact details of the Designated Managers and Board members are provided in [Appendix 1](#).

6 INFORMATION SHARING AND CONFIDENTIALITY

We will record and store information on secure internal systems, to which only nominated colleagues have access. We will only share information with those who have a right to access it and we will only share information via approved secure means.

Effective sharing and, where possible, early sharing of information between professionals and local agencies is essential for effective identification, assessment and service delivery and prevention.

Child Safeguarding Practice Reviews have shown how poor information sharing has contributed to the deaths or serious injuries of children. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Where a concern raises questions about the immediate safety of a child, consultation with the relevant manager or directly with Children's Services (if a manager is unavailable) must be immediate.

All colleagues should work by the **7 Principles** contained in [Advice to practitioners providing safeguarding services](#) (see [Appendix 2](#) and also refer to *Independent People's Data Protection in Operation* document for guidance on consent and confidentiality).

Colleagues should use their judgement when making decisions on what information to share and consult with their manager or Designated Manager if in doubt (see Part 2).

The most important consideration is whether sharing information is likely to safeguard and protect a child.

It is better to share a concern that may prove groundless than to wait for certainty, which may result in irreparable damage to the child.

7 SUPPORT FOR YOUNG PEOPLE AND COLLEAGUES

Independent People will ensure a planned approach to supporting victims of abuse and ensure that they are supported at the time of crisis and on an ongoing basis. Independent People will also ensure that young people who are parents also receive adequate and proactive support.

Where we are unable to provide this support ourselves, we will endeavour to refer to appropriate support agencies, including counselling services and legal advice.

We will ensure that all young people using our services have access to awareness-raising work, discussion, and support to understand safeguarding and its relationship to them - this includes educating young people who may be perpetrators or have potential to perpetrate abuse.

Where appropriate, and in addition to our duty to keep people safe and report safeguarding concerns, we will proactively work with any young people who perpetrate abuse or may be at risk of doing so - to undertake risk assessments and risk management plans - and bring in other involved professionals, continuing to provide support whilst they remain in our service, recognising that they may also be vulnerable.

Independent People acknowledges that child abuse and child protection can be traumatic and emotionally draining. Support is available for all colleagues as needed and regularly through supervisions, reflective practice, and team meetings. Where additional external support is needed (including counselling) this can be accessed either through Independent People's employee's assistance scheme or through other agreed bespoke support, including where necessary 'whole team' support.

8 CONDUCT OF COLLEAGUES

All colleagues must abide at all times by Independent People's "**Safeguarding Code of Conduct**" ([Appendix 5](#)) and full **Code of Conduct**.

If colleagues are found to be in breach of either, the police and/or local authority may be involved, in addition to Independent People taking disciplinary action under our **Disciplinary Procedure** for action that may be considered as gross misconduct.

9 ALLEGATIONS AGAINST COLLEAGUES

All allegations or suspicions of abuse by a colleague will be taken seriously and treated carefully and fairly in accordance with the relevant local authority's procedures (see [South West Child Protection Procedures](#)).

All colleagues should be alert to any signs that another colleague within Independent People or of other organisations is behaving inappropriately in relation to a young person and take appropriate action quickly.

Colleagues **must** report any concerns that another colleague may have behaved inappropriately or where they have received information that may constitute an allegation to the Designated Manager as soon as possible or within 1 working day, however trivial the allegation may seem.

Colleagues subject to allegations of abuse will be offered as much support as is possible without compromising the investigation or its outcome.

See [Part 2, Section 11](#) for detailed procedure.

10 SAFEGUARDING TRAINING

Practitioners and managers must be able to work effectively both with internal and external colleagues, and for this reason all colleagues who have regular contact with children and young people will attend the local partnership's approved inter-agency training.

All colleagues can expect to receive training that equips them with the knowledge, confidence and skills they need to effectively safeguard and promote the welfare of children. This includes being able to recognise when a child or young person may require protection and knowing what to do in response to concerns or allegations of significant harm.

Attendance at child protection training is mandatory for all colleagues involved in services for children and young people.

Independent People will assess all individuals for their training requirements based on their role, guided by the relevant local authority partnership standards and requirements.

[Appendix 4 - Colleague training plan](#) describes the training expectations for colleagues, how this will be managed, resourced, and monitored and supervised.

11 LEGAL FRAMEWORK

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England.

- The Department for Education (DfE) is responsible for child protection in England. It sets out policy, legislation, and statutory guidance on how the child protection system should work.
- [Providing supported accommodation for children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/providing-supported-accommodation-for-children-and-young-people) – developed by DfE, with Ofsted in March 2023; one of the Quality Standards is Protection
- Local partners are responsible for child protection policy, procedure, and guidance at a local level. The local safeguarding arrangements are led by three statutory safeguarding partners: the local authority, the clinical commissioning group, and the police. They must co-ordinate and ensure the effectiveness of work to protect and promote the welfare of children, including planning to identify and support children at risk of harm.

- **Section 11 of the [Children Act 2004](#)** places a duty on Independent People to protect children. All Independent People workers have a responsibility to take all reasonable and practical steps to protect children from abuse. The duty to protect children is part of a wider duty to safeguard and promote the welfare of children, and Independent People is required to cooperate with local authorities to promote the well-being of children.
- [Working Together to Safeguard Children \(2018\)](#) describes the legal requirements and expectations on individual services to safeguard and promote the welfare of children and provides the framework for local partnership boards to monitor the effectiveness of local services.
- [DfE Keeping Children Safe in School Guidance 2022 \(updated annually\)](#) sets out the legal duties to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges. As of September 2022, the guidance also provides detailed information on how to respond to sexual violence and harassment between children in schools. This guidance is relevant for the Youth Education Service part of the organisation.
- Independent People has a duty to ensure that children in their care are properly supervised and protected from accidental harm. All workers must always follow health and safety procedures - see Independent People's ***Health and Safety Policy***.

12 YOUNG PEOPLE OVER 16 YEARS OF AGE

Young people aged 16 and 17 years old are entitled to receive protection under safeguarding children legislation. Whilst acknowledging this, Independent People will take into account the young person's maturity and ability to participate in the process of their own protection.

Independent People upholds a young person's right to a response appropriate to their age and self-determination, however, this will always be considered within the framework of protecting them from harm as well as their looked after / care leaver status.

Although sexual activity in itself is not an offence over the age of 16, young people under the age of 18 are still entitled to protection if they are at risk through the relationship. Colleagues must be alert to the risk of sexual exploitation. Young people over the age of 16 and under the age of 18 are not deemed able to give consent if the sexual activity is with an adult in a position of trust or a family member, as defined by Section 27 of the Sexual Offences Act 2003. Workers must also consider other factors which might influence the ability of the person to give consent, e.g., learning disability / mental ill health. A child under 18 cannot consent to their own abuse through exploitation.

Where it is believed that a young person is suffering or at risk of significant harm a referral must always be made to Children's Social Care Teams and/or the police as relevant.

13 SAFE RECRUITMENT PRACTICE

Independent People acknowledges that safe recruitment plays a key role in successful child protection and so all recruitment must follow the procedures in our ***Recruitment Policy***.

Recruitment and employment procedures fully take account of the need to safeguard and promote the welfare of children and young people, including DBS and other relevant checks for all colleagues, checking employment gaps and references, and testing at interview.

All job descriptions and volunteer role descriptions reference safeguarding responsibilities.

14 WORKING WITH TRANSLATION AND INTERPRETING SERVICES

Translation and interpreting services will be provided where required. This is to ensure we communicate effectively with children, young people, and their families effectively where, for example English is not their first language or people are reliant on British Sign Language to communicate or where written documentation needs to be understood using Braille.

Family, friends or involved professionals should not be used to translate or interpret, but professionals can be used to arrange appointments and establish communication needs. Children should never be used as interpreters.

Where necessary, we will work in partnership with the police and Children's Social Care Teams to ensure arrangements are in place for all relevant documents and information to be translated into an accessible format, which the child and their family can clearly understand.

15 MAKING OUR POLICY AVAILABLE

This Policy will be made available to all colleagues during their induction, as a signed for critical document, and the current policy version is available to all colleagues in the policy and procedure section of our shared drive.

The Policy is available on Independent People's website and young people are given a summarised version at commencement of service in the Young People's Handbook, as well as details of Independent People's 24/7 out of hours on call procedure for access to help in a crisis or an emergency. Individual young people will also be signposted to other relevant and appropriate out of hours sources of help and support.

The Policy will be also made available to young people's kinship and support networks and other practitioners through our website and provided upon request.

16 POLICY ASSURANCE, DEVELOPMENT AND REVIEW

Independent People is committed to ensuring that we deliver the best practice we can, to safeguard children and young people.

We ensure that all our policies and procedures are live, working and developing documents.

This Policy and Procedure will be reviewed and updated as necessary, and at least once a year. Each review is ratified at Board level.

Policies are reviewed regularly and in consultation with young people, Unison, or other identified stakeholders as relevant, through:

- Team briefings, team meetings and development days
- Board / Committee meetings
- Independent People Ambassadors, 1625 Connects events and other young people's meetings as appropriate
- Stakeholder feedback processes

Independent People also:

- Conducts an annual audit of safeguarding to ensure compliance and identify learning and development needs (reported to Board)
- Has evaluated our safeguarding arrangements to ensure they are compliant with the [NSPCC safeguarding standards and guidance and self-assessment toolkit](#) (2019)
- Completes statutory safeguarding assessments as required, transferring relevant learning and action into our strategic safeguarding plan, which is overseen by the strategic leadership team.

PART 2: PROCEDURE (Child Protection)

1 LINK TO THE SOUTH WEST CHILD PROTECTION PROCEDURES

This section reflects the [South West Child Protection Procedures](#).

Independent People colleagues should consult the SWCPP web-based resources alongside any specific Independent People procedures, as the SWCPP website is regularly updated with useful guidance and procedures in relation to specific situations relevant to each local authority in the region.

See also [Appendix 1](#) and [Appendix 7](#) for links to other relevant organisations and services.

2 KEY PRINCIPLES FOR COLLEAGUES

- Nothing is more important than children and young people's welfare. Children and young people who need help and protection deserve high quality and effective support as soon as a need is identified
- Children and young people have a right to be safe and be protected from all forms of abuse and neglect
- Safeguarding children and young people is everyone's responsibility
- It is better to intervene as early as possible, before issues escalate and become more damaging, and
- Children, young people, and families are best supported and protected when there is a coordinated response from all relevant agencies.

You should not let other considerations, such as the fear of damaging relationships with the young person themselves, any involved adults, or other young people, get in the way of protecting children and young people from abuse and neglect. If you think that a referral to a local authority children's team is necessary, you should view it as the beginning of a process of inquiry, not as an accusation.

You should never assume that someone else will pass on information. If you have concerns about a child or young person's welfare and believe they are or are likely to suffer harm, then we must share the information with Children's Social Care Teams.

It is our role to observe and record incidents and not to investigate. Colleagues must be aware that a disclosure may have involved criminal activity and if poorly handled could increase the risk for the child / young person and could undermine a potential prosecution. Our role, where we have possible evidence of abuse, is to pass the information on to Children's Social Care Teams or the police to enable them to carry out their investigative duties.

Colleagues must ensure they are alert to the signs of abuse and neglect, that they question the behaviour of children, young people and parents/carers and do not necessarily take what they are told at face value.

During an assessment by Children's Social Care Teams and any subsequent enquiries into suspicions of significant harm investigation, it is our colleagues' role to support the process by providing accurate information, including doing all we can to ensure that an appropriate person from 1625IP attends any subsequent meetings that are held about a young person.

3 DISCLOSURES and CONFIDENTIALITY

Colleagues should never give a guarantee of confidentiality to a child or young person that wishes to disclose or that actively discloses abuse. Colleagues who receive such information should handle the situation sensitively and explain it is necessary to involve other agencies to protect the young person. Although best avoided, the situation may arise where information must be passed on without the young person's agreement.

All children and young people receiving services from Independent People will be informed of Independent People's **Data Protection in Operation Procedure** and the exceptions we will make in regard to breaching confidentiality when we believe a child or young person's safety is at risk.

The child or young person's welfare must be paramount.

For further information see [Appendix 2](#).

4 RESPONDING TO AN INCIDENT OR SUSPICION OF CHILD ABUSE

Each local authority has 'thresholds' guidance which describes levels of concern and sets out relevant actions and approaches to keep children and young people safe. The following section provides an overview.

4.1 A child under immediate threat

Where there is a risk to the life of a child / young person or likelihood of serious immediate harm an agency with statutory child protection powers must be contacted immediately:

- **Children's Social Care Teams**
- **Police**
- **NSPCC**

Where a child or young person needs immediate medical assistance, this overrides all other considerations and must be sought immediately. Parental consent is not required in these instances. The worker involved must tell the doctor or medical staff if they believe the child / young person has been abused.

See [Appendix 1](#) for links to all relevant agencies.

4.2 A child for whom there is concern

All colleagues have a responsibility to consult with their line manager or **Designated Senior Manager** when they have concerns about the safety of a child or young person, if:

- You believe that you have seen possible evidence of child abuse
- You have concerns that a child / young person may be at risk of significant harm, or
- You receive an allegation of abuse or possible abuse.

It is better to share a concern that may prove groundless than to wait for certainty, which may result in irreparable damage to the child / young person.

Where the concern raises questions about the immediate safety of the child / young person, consultation with the relevant manager or directly with Social Care Teams if a manager is unavailable should be immediate (see 4.1 above).

Preserving evidence: Be aware that in certain situations medical or other evidence will be needed.

You may need to lock rooms or ensure that equipment and documents are secured appropriately, so that evidence cannot be tampered with. If there has been physical or sexual assault you should not clear up, move things, wash people or their possessions, e.g., bedding or clothing, before you report the incident and have taken the advice of the police.

4.3 Responding to a disclosure

Remember to (as appropriate):

- Stay calm and try not to show if you are shocked
- Listen carefully and be sympathetic, you do not need to press the child / young person for lots of detail, as taking a full written statement from the child / young person at this point could be too stressful and jeopardise any future police investigation
- Tell the child / young person they have done the right thing in telling you and that the abuse is not their fault
- Tell the child / young person that you are treating what they said seriously and that you will be talking to someone responsible about it
- Tell them that you will do your best to support them
- Clarify with them the nature of the abuse and establish if it needs an urgent response
- Make sure that everything you do keeps the person safe for now
- Consult with your line manager, another appropriate manager or if they are not available, the Designated Manager as quickly as possible and, as a maximum, **within 24 hours of a concern or allegation coming to light**
- If this is not possible then you should consult directly with Children's Social Care Teams (see [Appendix 1](#)). Any steps taken should be reported to your line manager as soon as possible
- Record all details of the incident and what action has been taken (see [Part 2, Section 10](#)).

4.4 Discussion with your line manager

The following questions will help you and your manager decide what to do next:

- What is your concern?
- How long have you been concerned?
- Who else has concerns?
- What do you think could be happening to the child / young person?

Consider a range of possible things that could be happening, rather than jumping to one conclusion:

- How could you find out whether each of these possibilities is true?
- What information do you have already?
- What have you already done to address your concerns?
- Have you discussed your concerns with the parents and the child or young person?

- If yes - what did they say?
- If no - why not?
- What would be the possible impact on the child / young person?

Possible evidence of abuse should be considered in relation to the situation in which it occurred and the child or young person's history. You should check our own records for additional information which might help show whether the concern is likely to indicate abuse or the risk of abuse. This could include information about what interventions have been previously offered to the child / young person or the parents, and their outcomes.

Following consultation with your line manager a decision will be reached on how to proceed. This will include deciding whether, when and how any concerns will be discussed with the child / young person or parent and whether a referral to Social Care Teams is necessary.

If concerns remain following the discussion you (or your manager) could contact someone in another agency and discuss the situation (without mentioning the child / young person's name). You or your manager may also seek advice from Children's Social Care Teams prior to a decision on how to proceed.

4.5 No longer have concerns

If you and your manager decide that there is no reason to be concerned or that the child / young person's needs can be met by Independent People alone, you should continue to provide services as before, as well as additional services from Independent People and partner agencies as required.

Decisions made should be clearly recorded on case records, giving a clear explanation why a referral to the relevant Children's Social Care Team was not made.

All colleagues should consider seriously whether using the local procedures for an assessment of the child / young person's or family's support needs could help meet the child / young person's and family's needs. This option should always be discussed with the line manager.

5 REFERRAL TO CHILDREN'S SOCIAL CARE TEAMS

5.1 Introduction

Anyone who has concerns about a child or young person's welfare can make a referral to Children's Social Care.

Referrals to Children's Social Care services usually fall in to three categories:

- Seeking Advice from Children's Social Care;
- Sharing a concern about a child or their family;
- Making a referral based on risk to the child and their needs.

Children's Social Care has the responsibility to clarify with the referrer the nature of the concerns and how and why they have arisen.

The local Threshold Protocol provides guidance about the criteria for making and receiving referrals (see [Appendix 7](#)).

The child / young person must be seen by a qualified social worker as soon as possible following a referral and their needs and safety remain paramount at all times.

5.2. Duty to refer

All professionals have a responsibility to refer a child to Children's social care under section 11 of the Children Act 2004 if they believe or suspect that the child / young person:

- Has suffered significant harm
- Is likely to suffer significant harm
- Has a disability, developmental and welfare needs which are likely only to be met through provision of family support services (with agreement of the child's parent) under the Children Act 1989
- Is a Child in Need whose development would be likely to be impaired without provision of services.

When professionals make a referral to Children's Social Care, they should include any pre-existing assessments such as an Early Help Assessment in respect of the child / young person.

Any information they have about their developmental needs and the capacity of their parents and carers to meet these within the context of their wider family and environment should be provided as a part of the referral information.

The referrer must always have the opportunity to discuss their concerns with a qualified social worker.

5.3. Making a referral

For all referrals to Children's Social Care, the child or young person should be regarded as potentially a child in need, and the referral should be evaluated on the same day that it was received. A decision must be made by a qualified social worker supported by their line manager within one working day about the type of response that is required.

New referrals and referrals on closed cases should be made to the Children's Social Care duty social worker. Referrals on open cases should be made to the allocated social worker for the case (or in their absence their manager or the duty social worker).

The referrer should provide information about their concerns and any information they may have gathered in an assessment that may have taken place prior to making the referral. The referrer will be asked for information about some of the following:

- Full names (including aliases and spelling variations), date of birth and gender of all child/ren in the household
- Family address and (where relevant) school / nursery attended
- Identity of those with parental responsibility and any other significant adults who may be involved in caring for the child such as grandparents
- Names and date of birth of all household members, if available
- Where available, the child's NHS number and education UPN number
- Ethnicity, first language and religion of children and parents
- Any special needs of children or parents
- Any significant/important recent or historical events/incidents in child or family's life

- Cause for concern including details of any allegations, their sources, timing and location
- Child's current location and emotional and physical condition
- Whether the child needs immediate protection
- Details of alleged perpetrator, if relevant
- Referrer's relationship and knowledge of child and parents
- Known involvement of other agencies / professionals (e.g., GP)
- Information regarding parental knowledge of, and agreement to, the referral
- The child's views and wishes, if known

Other information may be relevant, and some information may not be available at the time of making the referral. However, there should not be a delay in order to collect information if the delay may place the child / young person at risk of significant harm.

The parents' permission should be sought before discussing a referral about them with other agencies unless permission-seeking may itself place a child / young person at risk of significant harm. Where a professional decides not to seek parental permission before making a referral to Children's Social Care, the decision must be recorded in the child / young person's file with reasons, dated and signed and confirmed in the referral to Children's Social Care.

All referrals from professionals should be confirmed in writing, by the referrer, within 48 hours. If the referrer has not received an acknowledgement within three working days, they should contact Children's Social Care again.

5.4. Receiving a referral

The social worker will discuss the concerns with the referrer and consider any previous records in relation to the child / young person and family in their agency. The social worker will establish:

- The nature of the concerns
- How and why they have arisen
- The child's views, if known
- What the child's and the family's needs appear to be
- Whether the family are aware of the referral and whether they are in agreement with it or not
- Whether the concern involves abuse or neglect; and
- Whether there is any need for any urgent action to protect the child or any other children in the household or community.

A decision to discuss the referral with other agencies without parental knowledge or permission should be authorised by a Children's Social Care manager, and the reasons recorded.

This checking and information gathering stage must involve an immediate assessment of any concerns about either the child / young person's health and development, or actual and/or potential harm, which justify further enquiries, assessments and / or interventions.

Interviews with the child / young person, if appropriate, should take place in a safe environment. All interviews with the child / young person and family members should be undertaken in their preferred language and, where appropriate, for some people by using non-verbal communication methods.

The Children's Social Care manager should be informed by a social worker of any referrals where there is reasonable cause to consider Section 47 Enquiries and authorise the decision to

initiate action. If the child / young person and / or their family are known to professional agencies or the facts clearly indicate that a Section 47 enquiry is required, the Children's Social Care team should initiate a strategy meeting/discussion immediately, and together with other agencies determine how to proceed.

The police must be informed at the earliest opportunity if a crime may have been committed. The police should assist other agencies to carry out their responsibilities where there are concerns about the child / young person's welfare, whether or not a crime has been committed.

During assessment and any enquiries into suspicions of significant harm investigation, Independent People colleagues must be aware that it is their role to support Children's Social Care Teams in this process, by providing accurate information. It is our role to observe and record incidents and not to investigate.

Independent People's role in case management following a strategy meeting or child protection conference should be within the boundaries of our service specification. A colleague should never assume the role of "key worker" for child protection purposes, as this is a statutory role.

5.5. Concluding a referral

At the end of the referral discussion, the referrer and Children's Social Care should be clear about the proposed action, who will be taking it, timescales or whether no further action will be taken.

Referral outcomes about a child / young person, where there may be concerns, typically fall in to four categories and pathways:

- No further action, which may include information to signpost to other agencies
- Early help - referrals for intervention and prevention services within an Early Help Assessment and Early Help services range of provision
- Child in Need services - assessment to be undertaken by Children's Social Care (Section 17 Children's Act 1989)
- Child Protection services - assessment and child protection enquiries to be undertaken by Children's Social Care (Section 47 Children's Act 1989) with active involvement of other agencies such as the police.

Whatever the outcome of a referral, it should have been assessed by a qualified social worker and a decision should have been made by the relevant line manager within the timescale of one working day about what should happen next. The Children's Social Care manager must approve the outcome of the referral and ensure that a record has been commenced and/or updated.

The social worker should inform, in writing, all the relevant agencies and the child / young person, if appropriate, and family of their decisions and, if the child / young person is a child in need, of the plan for providing support.

If the referrer disagrees with the decisions made by Children's Social Care about the outcome of the referral, they may consider making a complaint under the local complaint procedure or raise the matter under the local Escalation Policy (see [Part 2, section 8](#)).

When Children's Social Care services decide that the threshold is not met and do not get involved, you should, in consultation with your manager continue to follow up concerns,

working with the child / young person / family and collecting and recording further information. Do not stop until you are sure that the child / young person's needs are being met or that there is no need to be concerned

6 REQUESTS FOR INFORMATION UNDER SECTION 47, THE CHILDREN ACT

Where Independent People receive a request from Children's Social Care services for information, as part of Child Protection Enquiries under Section 47 of the Children Act, Independent People will:

- If contacted by phone - the worker, where necessary, check the Social Worker's identity
- Relevant information should be shared within the context that the welfare of the child / young person is paramount and overrides issues of confidentiality
- The worker should however clarify with the Social Worker whether consent of the parents/young person has been given for the enquiry and, if not, agreement should be reached on whether it is appropriate to seek consent prior to sharing information
- Information shared will be recorded. The records should indicate whether the child / young person's or parent's consent was obtained to share this information, and if not the reason for this should be recorded.

7 DISCUSSING CONCERNS WITH YOUNG PEOPLE AND PARENTS

In general, Independent People will seek to discuss and clarify any concerns with the child / young person / parents before a referral is made, and for their agreement to be sought for such a referral. Sharing information appropriately is key to putting in place the right support.

Whilst Independent People will, in general, seek to discuss any concerns with the child / young person / family and, where possible, seek their agreement to making referrals to Children's Social Care Teams, this should only be done where this will not place a child / young person at increased risk of significant harm.

Colleagues should be aware that raising concerns with parents about the welfare of their children is likely to cause distress to the parents and must be treated very sensitively - it must be based on evidence.

A colleague or manager may consult with Children's Social Care Services where advice is needed on whether it is in the child / young person's best interests to approach the child / young person or their parents directly.

If at any time a colleague is unsure where to report with or without disclosure, they should consult with their line manager or in their absence the Designated Manager.

8 PROFESSIONAL DISAGREEMENTS / ESCALATION

If, following a safeguarding referral, the relevant worker and their line manager are dissatisfied with the local authority's proposed action or decision not to investigate, in the first instance, this should try to be resolved between the relevant professionals through discussion.

If agreement is not reached and becomes 'stuck', the worker and their manager should notify the Designated Manager, who will consult the relevant Local Authority's Escalation Policy and agree next steps. See [Appendix 7](#)

Professional challenge is good practice and should be encouraged as learning from case reviews consistently highlights that good professional challenge could have led to better outcomes for children and families. Professional disagreement is only dysfunctional if not resolved in a constructive and timely fashion.

9 KEEPING PEOPLE INFORMED AND CLOSING CASES

Where a child or young person has disclosed information about abuse or the risk of abuse, the relevant Independent People manager/worker should ensure, as far as they are able to, that the “discloser” is kept informed about what will happen next. This will help reassure them about what to expect.

All colleagues who continue to have a role in a safeguarding case should keep themselves and other professionals involved and informed throughout, to the point that the case is concluded and/or handed over to other professionals or the police.

Once a case has been fully investigated, prescribed actions have been undertaken and the safeguarding issue has been resolved, open safeguarding logs will be authorised for closure by the relevant team manager.

A decision will be made about what information is shared with the individual, the alleged/proven perpetrator (if they are one of our young people) and involved professionals in regard to the resolution of the case - and who will share it. This includes any information that needs to be shared with others (who need to know) if any individual or group of individuals continue to pose a threat to other people.

The relevant manager will, where there is learning from a case that has wider team or organisational relevance, complete a brief case summary and lessons learned and share with the relevant team, internal managers and senior managers and external professionals - to enable suitable practice, policy, or other changes to be made.

10 RECORD KEEPING

Good record keeping is critical to ensure Independent People’s colleagues are accountable to young people, statutory authorities, and the organisation in relation to safeguarding. They help to provide continuity through case management as well as staffing changes or absences. Good records provide an essential source of evidence for investigations and enquiries where children or young people may be at risk.

Where a child or young person is subject to a child protection investigation, a care order, or child protection plan, or is otherwise deemed to be at risk of abuse then all cases of suspected or actual abuse must be recorded through Independent People's In-Form Safeguarding Log.

Your records should always cover key facts and information:

- **What you saw:** when and where
- **What you said:** when, where and who to
- **What was said or shown to you:** when, where and who by
- **What you thought** and why you thought it
- **What you did.**

Safeguarding Logs must be regularly reviewed by the team manager. An annual audit of all safeguarding logs on In-Form is completed and reported to Board, and managers; learning, training and improvements are identified through the audit and reporting process.

Records must be kept up-to-date, accurate and factual. Records relating to suspected, possible, or actual child abuse must record the name of the worker making the entry and the date of the entry.

Records should be clear, accessible, and comprehensive and any decisions and interventions clearly recorded.

Where an Independent People colleague has concerns about possible significant harm to a child or young person, the concerns must be clearly recorded and discussed with the colleague's line manager and/or Designated Manager (or the Designated Manager's deputy).

Where there is suspicion of non-accidental injury, expert advice is required. Colleagues must not try to diagnose, but simply and factually describe what they see. Where there are concerns that an injury to a child or young person may be the result of abuse, colleagues must record in detail any known history of the injury, in order that any physical findings can be assessed in relation to the explanation given.

Where a colleague has concerns about the welfare of a child or young person, records should include both positive and negative developments, e.g., they should record concerns, but also factors that alleviate previous concerns.

Records may show patterns that are of concern or provide corroborative evidence when abuse is suspected.

11 ALLEGATIONS AGAINST COLLEAGUES AND VOLUNTEERS

An allegation may relate to any person who works with children or young people in their role, who has:

- Behaved in a way that has harmed a child / young person, or may have harmed a child / young person; and/or
- Possibly committed a criminal offence against or related to a child / young person; and/or
- Behaved towards a child or children, young person or young people in a way that indicates they may pose a risk of harm to children / young people; and/or
- Behaved or may have behaved in a way that indicates that they may not be suitable to work with children or young people [WTTSC criteria revised the threshold for managing allegations regarding people in a position of trust to include a fourth criteria; "suitability"].

An allegation can relate to an adult's behaviour outside work, and their relationships with others, known as transferable risk, if they:

- Have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon
- Have, as a parent or carer, become subject to child protection procedures

- Are closely associated with someone in their personal lives (e.g., partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

If concerns arise about the person's behaviour in relation to their own children, the police and/or Children's Social Care must consider informing the employer / organisation to assess whether there may be implications for children with whom the person has contact at work / in the organisation, in which case this procedure will apply.

Allegations of historical abuse should be responded to in the same way as contemporary concerns. In such cases, it is important to find out whether the person against whom the allegation is made is still working with children and if so, to refer to the Local Authority Designated Officer (LADO). Decisions regarding informing the person's current employer or voluntary organisation should be made in consultation with the LADO.

Such allegations are distinct from a general concern about the quality of support or practice or a complaint.

If a professional receives an allegation or has a concern about the behaviour of a colleague working or volunteering with children / young people as detailed above, they must **report this** as soon as possible and no later than within 1 working day, however trivial it may seem.

- Reports should be to the Designated Senior Manager unless
 - The concern relates to a Director, in which case the report should be to the **CEO**, or
 - The concern relates to the CEO, in which case, the report should be to the **Designated Safeguarding Board Lead** see [Appendix 1](#)
- If, for any reason, the Designated Senior Managers are not available then then this must be reported to the CEO or the Designated Safeguarding Board Lead.

You should complete a written record of the nature and circumstances surrounding the concern, including any previous concerns and where the concern came from. This should include brief details only and be dated and signed. Due to the nature of this information, please confirm with the Designated Senior Manager where this information should be stored (it should not be recorded on In-Form).

You must maintain confidentiality and guard against publicity whilst an allegation is being considered or investigated and follow local information sharing protocols.

The allocated person with responsibility for ongoing management of any concerns raised will ensure that appropriate neutrality is maintained in relation to the individuals involved.

You should not:

- Attempt to deal with the situation yourself
- Make assumptions, offer alternative explanations, or diminish the seriousness of the behaviour or alleged incidents
- Keep the information to yourself or promise confidentiality
- Take any action that might undermine any future investigation or disciplinary procedure, such as interviewing the alleged victim or potential witnesses or informing the alleged perpetrator or parents or carers.

The Designated Senior Manager will contact the Local Authority Designated Officer (LADO) within 1 working day of receiving the report of an allegation.

Referral to the LADO should not be delayed in order to gather further information, nor should any action be taken, that might undermine any future investigation or disciplinary procedure, such as interviewing the alleged victim or potential witnesses, or informing or interviewing the alleged perpetrator, prior to contacting the LADO.

The LADO will provide advice and guidance and be involved in the management and oversight of all allegations and liaise with all relevant parties and monitor the progress of all cases. If a case involves accusation against a member of the strategic leadership team, the LADO should advise who the most appropriate person at Independent People to investigate this will be.

See [Appendix 1](#) for contact details for and more information about the LADO in each Local Authority area or visit [South West Child Protection Procedures](#).

The 4 possible outcomes of referral are:

1. Does not meet the threshold – advice provided to Independent People
2. LADO strategy meeting and action
3. Police investigation if relevant
4. Employer action in relation to internal procedures

Support for colleagues subject to allegations

- The police and other relevant agencies should always be consulted before informing a person who is the subject of allegations, as the colleague's action may require a criminal investigation.
- Independent People will ensure that local authority Social Care Teams and/or the police are given all assistance in pursuing any investigation in accordance with relevant law and Child Protection procedures.
- Colleagues subject to allegations of abuse will be offered as much support as is possible without compromising the investigation or its outcome. Colleagues will be provided with support throughout the investigation process and will be helped to understand the concerns expressed and the processes being operated. They will be clearly informed of the outcome of any investigation and the implications for disciplinary or related processes.
- If the person is suspended, Independent People will plan to keep the individual informed about developments. If the person is a member of a union or professional association, they will be advised to contact that body at the outset.

More information about the LADO, including information for people who are subject to an allegation can be found here:

<https://bristolsafeguarding.org/children/lado-concerns-about-professionals/>

or here <http://sites.southglos.gov.uk/safeguarding/wp-content/uploads/sites/221/2015/05/LADO-FLOWCHART.pdf>

Keeping Children Safe in Education – specifically for Youth Education Service team

Under the legislation there are 2 levels of concerns:

- Concerns or allegations that may meet the harm threshold (to be dealt with in as described in the section above) and
- Concerns or allegations that do not meet the harm threshold (referred to as Low-Level concerns) – the following section covers how these are dealt with

Low-level concerns

We have developed a culture where all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. This enables us to:

- Identify inappropriate, problematic, or concerning behaviour early
- Minimise the risk of abuse, and
- Ensure that adults working in or on behalf of the YES service are clear about professional boundaries, and in accordance with our values.

What is a low-level concern?

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favorites
- taking photographs of children on their mobile phone, contrary to 1625 policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the Designated Safeguarding Manager and or the YES Service Manager and recorded and dealt with appropriately. Ensuring

they are dealt with effectively should also protect those working in or on behalf of the YES service from becoming the subject of potential false low-level concerns or misunderstandings.

Sharing low-level concerns

All low-level concerns should be shared with the Designated Safeguarding Manager and YES Service Manager. This can be done verbally or by email.

If you wish to report it confidentially then, please do so via concerns@1625ip.co.uk (see Code of Conduct and Concerns at Work Policies for more detail).

If the concern is about supply staff or a contractor, the Designated Safeguarding Manager or YES Service Manager will notify their employer.

If a colleague has found themselves in a situation that could be misinterpreted, might appear compromising to others, and/ or on reflection they believe they have behaved in such a way that they consider falls outside expected professional standards they should self-report to the YES Service Manager in the first place. This is important as it means that we can manage a safe environment for young people and colleagues.

Recording low-level concerns

All low-level concerns will be recorded in writing and stored against the colleagues profile on People HR as a low-level concern logbook – this will record:

- The details of the concern
- The context in which the concern arose and
- The action taken

Each term (and as part of the safeguarding annual audit) any low-level concerns logbooks will be reviewed both individually and collectively so that problematic patterns of inappropriate, problematic, or concerning behaviour can be identified.

Should patterns emerge the Designated Safeguarding Manager will decide whether this should be address through the Disciplinary Procedure or if the pattern of behaviour moves this from a low-level concern to meeting the harm threshold and, in which case it should be referred to the LADO following the procedure in the first part of this section 11.

If there is a collective pattern of behaviour emerging and this is becoming a wider cultural issue the Designated Safeguarding Manager and YES Service Manager should decide if there are necessary policy changes or extra training to be delivered to rectify these patterns of behaviour and minimise of them continuing.

References

Managers should only provide substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold in references. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

Third parties raising concerns

If a third party raises a concern the Yes Service Manager will collect as much evidence as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously, and
- To the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action taken.

Appendix 1: Safeguarding Contacts (internal and external)

Designated Senior Managers (Safeguarding Leads) within Independent People

- **Operations Director:** Paul Hale
1625 Independent People, Kingsley Hall, 59 Old Market Street, Bristol, BS2 0ER
Telephone: 0117 317 8800
Work mobile: 07872 305 642
paul.hale@1625ip.co.uk
- **Or in their absence** – Operations Director: Vicky Harwood
Address as above
Work mobile: 0777 595 1617
vicky.harwood@1625ip.co.uk
- **Or in their absence** - Chief Executive: Dom Wood
Address as above
Work mobile: 07531 820 242
dom.wood@1625ip.co.uk

Independent People Designated Board member for safeguarding

- Sarah Gallacher
Please contact 0117 317 8800 for contact details
- **Or in their absence** - Chair of the Board, Nick Hooper
Please contact 0117 317 8800 for contact details

Ofsted regulations required posts

- **Registered Services Manager:** Janice Bicknell
1625 Independent People, Kingsley Hall, 59 Old Market Street, Bristol, BS2 0ER
Work mobile: 07929 780534
Janice.bicknell@1625ip.co.uk
- **Nominated Individual:** Vicky Harwood
Address as above
Work mobile: 0777 595 1617
vicky.harwood@1625ip.co.uk

Independent People PREVENT leadership:

- Karen Clark, Team Manager
karen.clark@1625ip.co.uk
Work mobile: 07984 576 305
- **Or in their absence** - Emma Seviour, Intensive Support Services Team Leader
emma.seviour@1625ip.co.uk
Work mobile: 07964 467 842

Other Useful Contacts

- **Childline:**
0800 1111 <https://www.childline.org.uk/>
Free confidential advice and support for Under 18's
- **[NSPCC HELPLINE:](#)**

0808 800 5000 help@nspcc.org.uk

Professional counsellors 24/7 for help, advice and support about safeguarding

- **[NSPCC FGM HELPLINE:](#)**
0800 028 3550
Email fgm.help@nspcc.org.uk

CHILDREN'S SOCIAL CARE CONTACTS FOR REPORTING CONCERNS (external):

Before reporting - it is advisable to check their local procedures via this link (so you can prepare)

- [SWCPP - local procedures](#)

Bristol

- Report a concern: **0117 903 6444** (office hours)
- [Welcome to the Keeping Bristol Safe Partnership website. \(bristolsafeguarding.org\)](http://bristolsafeguarding.org)
- **Local Authority Designated Officer (LADO):** 0117 903 7795
- [LADO Concerns Professionals Bristol Referral Form \(bristolsafeguarding.org\)](#)

South Gloucestershire

- Report a concern: **01454 866 000** (office hours)
- Or use the [Safeguarding South Gloucestershire](#)
- **Local Authority Designated Officer (LADO):** 01454 868508 (or if unavailable, call 01454 866000)
[Managing allegations South Gloucestershire](#)
- **Multi-Agency Safeguarding Hub (MASH)** - From September 25, 2023, a MASH launches in South Gloucestershire.
 - The MASH is a multi-agency group of professionals with its main aim to ensure collaborative working to deliver effective and focused services to children, young people, and their families, at the earliest opportunity. The MASH is based at the South Gloucestershire Council Offices, within the Access and Response Team hub (ART), who receive the initial enquiries. The MASH operates on a hub and spoke model where information is securely, swiftly, and legally shared across partner agencies to determine the next steps.
 - *This does **not** change the ways in which Safeguarding referrals are made in South Glos, but the way that referrals are responded to, once received.*

Bath and North East Somerset (BANES)

- Report a concern; **01225 396 111 or 01225 477 929** (public only - office hours)
- Or use the [online referral form](#)
- **Local Authority Designated Officer (LADO): 01225 396 810**

North Somerset

- Report a concern; **01275 888 808** (office hours)
- Online information https://www.proceduresonline.com/swcpp/northsomerset/p_report_concerns.html
- <https://www.northsomersetsafeguarding.co.uk/>
- **Designated Officer for Allegations (DOFA, formerly LADO):** 01275 888 211

Out of Hours – Emergency Duty Team

- In all areas (Bristol, BANES, South Gloucestershire, and North Somerset), call the Emergency Duty Team on 01454 615 165.

If a child or young person is in **immediate danger dial 999** and ask for the police.

POLICE CONTACT DETAILS

- **Call 999 when it is an emergency.**
- Call 101 to report crime and other concerns that do not require an emergency response.

HEALTH

- **Call 999 if it is an emergency.**
- Call 111 if you need medical help fast but it's not a 999 emergency.

A&E departments

- **Southmead Emergency Department and Minor Injuries Unit**
Brunel building, Southmead Hospital, Southmead Road, Bristol, BS10 5NB.
Emergency Department Main Reception Gate 35
Telephone: 0117 414 5100 or 0117 414 5101.
Open 24 hours, 7 days a week including bank holidays.
- **Bristol Royal Infirmary A&E Department**
Upper Maudlin Street, Bristol BS2 8HW
Telephone: 0117 923 0000
Open 24 hours, 7 days a week including bank holidays.
- **Bristol Royal Hospital for Children A&E Department**
For children up to 16 years of age
Paul O'Gorman Building, Upper Maudlin Street, Bristol BS2 8BJ
Telephone: 0117 923 0000
Open 24 hours, 7 days a week including bank holidays.
- **Bristol Eye Hospital A&E Department**
Lower Maudlin Street Bristol BS1 2LX
Telephone 0117 342 4613
830 – 430, 7 days a week

Appendix 2: Seven Principles of information sharing

All colleagues should work by the **7 Principles** contained in [Advice to practitioners providing safeguarding services](#).

These are:

Necessary and proportionate; When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is necessary to be of use is a key element of the GDPR and Data Protection Act 2018, and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

Relevant; Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make sound decisions.

Adequate; Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

Accurate; Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

Timely; Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a child or young person at increased risk of harm. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

Secure; Wherever possible, information should be shared in an appropriate, secure way. Practitioners must always follow their organisation's policy on security for handling personal information.

Record; Information sharing decisions should be recorded whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures.

If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with the organisation's retention policy, the information should not be kept any longer than is necessary. In some circumstances this may be indefinitely, but if this is the case there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so.

And remember, do not keep concerns about the welfare of a child or young person to yourself.

Appendix 3: What is significant harm?

Significant Harm is any physical, sexual, or emotional abuse, neglect, accident or injury that is sufficiently serious to adversely affect progress and enjoyment of life.

Harm is defined as the ill treatment or impairment of health and development. This definition was clarified in section 120 of the Adoption and Children Act 2002, so that it may include, "*for example, impairment suffered from seeing or hearing the ill treatment of another*".

Child protection uses the concept of significant harm in order to determine whether a child is in need of additional levels of support and monitoring. The Children Act 1989 introduced the concept of significant harm as:

"The threshold that justifies compulsory intervention in family life in the best interests of the child".

Section 47 of the Children Act 1989 places the local authority under a duty to make enquiries, or cause enquiries to be made, where it has reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

There are no absolute criteria for establishing significant harm. Whether the harm or likely harm suffered by the child is significant is determined by comparing the child's health or development with that which could reasonably be expected of a similar child.

Professionals must also take account of the child's reactions, and his/her perceptions and wishes and feelings, according to their age and understanding.

It is therefore only through assessment that it is possible to establish whether a child has suffered, or is likely to suffer, significant harm.

Sometimes, a single traumatic event may constitute significant harm, e.g., a violent assault, suffocation, or poisoning.

More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change, or damage a child's physical and psychological development.

Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm. Others may suffer significant harm from seeing or hearing the ill-treatment of another, for example in cases of domestic abuse.

Professional judgements about significant harm are made following the completion of an assessment when the information collated is analysed and conclusions drawn. The analysis is informed by:

- Research evidence
- Practice guidance
- Legislation and regulations
- Practice experience
- Training

In all cases, to decide whether the child is suffering or is at risk of suffering significant harm, an assessment must examine all relevant factors in the family:

- The degree and extent of physical harm or neglect
- The duration and frequency of abuse and neglect – one off incident or continuing
- The extent of premeditation
- The presence or degree of threat, force, sadism, and bizarre/unusual elements
- Contributing factors to incidents
- The past history of the perpetrator or family
- The risk factors in the family
- The wider and environmental family context
- The child's development within the context of their family and wider social environment
- Any special needs, such as a medical condition, communication difficulty or disability that may affect the child's development and care within the family
- The age of the child and their resilience
- The impact on the child's health and development
- The capacity of the parental carer to adequately meet the child's needs
- The acknowledgement by the parent/carer of the problem
- The co-operation of the parents/carers
- The likelihood of and capacity for change and improvements in parenting and care of the child
- Whether there is an identified protector
- The family's strengths and support networks
- The child's views of how safe they are and what is in their best interests

Appendix 4: Safeguarding and child protection training plan

All colleagues are required to attend:

- Safeguarding training identified by their line manager as being required based on their job role and relevant local authority partnership guidance
- Refresher training - in line with Avon and Somerset Strategic Safeguarding Partnership guidance.

1. Induction and further training (safeguarding and child protection):

Induction is designed to ensure that all colleagues are familiar with safeguarding child protection responsibilities. During the first 4 weeks of employment all those in contact or working with children and young people will receive mandatory induction into child protection awareness (alongside reading the policy and procedure), which includes:

- The child protection and safeguarding adults' responsibilities of all colleagues
- What is abuse and neglect
- Basic signs and symptoms of abuse and neglect
- What to do in response to concerns
- Familiarisation with Independent People's policy and procedures for reporting concerns
- Awareness of how to access the South West Child Protection Procedures, Working Together to Safeguard Children, LSCB Procedures, Local Adult Care Services for Vulnerable Adults
- The names of designated managers and lead persons
- The role of the LADO and how to respond to allegations against colleagues
- The need to explain to all service users at start of support the safeguarding statement in the Young People's Handbook and our Service Standard for Staying Safe
- How to contact local social care teams and the emergency duty team
- Details of how to book on the relevant training as detailed below
- Maintaining a client/child focus

This training is provided by the line manager.

Non direct support colleagues are required to complete the online Safeguarding Children Level 2 provided by iHASCO). An individual assessment will be made by the line manager in cases where progression on to a higher level of training is required (dependent on role). Any additional training for trustees will be reviewed on an annual basis by the CEO.

Direct support colleagues, along with an induction and the iHASCO training course above, it is a mandatory requirement that all colleagues working directly and regularly with young people attend the first available local safeguarding partnership approved interagency training after commencing their employment.

Youth Education Service Colleagues, along with an induction in Child Protection Awareness, it is a mandatory requirement to read part 1 of the [Keeping Children Safe in Education guidance](#) and to attend training in this annually.

Service managers and Designated Senior Managers will receive induction training and inter-agency training as described above for support colleagues and will then be expected to attend

a management and/or advanced course as advised by the relevant local authority safeguarding partnership.

Line managers are responsible for assessing the training history of new colleagues, arranging awareness training where required, and ensuring that the booking of local safeguarding partnership inter-agency training takes place **within the first 4 weeks of employment**, ensuring that the colleague concerned attends.

2. Refresher training

All colleagues regardless of their position will be expected to attend refresher training at the appropriate level no less frequently than every 3 years.

3. Training plan

On an annual basis Independent People will

- Identify the volume of different 'standard' safeguarding training required and review against local approved training resources.
- For all operational colleagues: Review competency levels expected of colleagues in different roles across the organisation and identify inter-team training needs. Line managers will assess individual colleague training requirements based on their role, and relevant guidance. This will be combined with the annual training plan
- Ensure the necessary resources are allocated and reflect the mandatory nature of safeguarding training. Managers should liaise with their colleagues as necessary to ensure adequate cover is in place to facilitate attendance at safeguarding training.
- The safeguarding training plan and People HR will be monitored regularly to ensure all colleagues have up-to-date training in place.

4. Responsibilities for implementation of the training plan

The People Support Officer is responsible for:

- Ensuring all colleagues are booked on relevant courses (unless otherwise agreed);
- Alerting managers of all colleagues whose safeguarding training is 3 years old.
- Ensuring that the People HR system is regularly updated with safeguarding training attended.

Line managers are responsible for:

- Ensuring that safeguarding and promoting the welfare of children and young people is addressed through colleague induction, training, and regular supervision
- Ensuring that colleagues are booked on the appropriate training

The Head of People is responsible for:

- Ensuring performance reporting to the Strategic Leadership Team and to Board.

Operations Directors are responsible for:

- Ensuring safeguarding training plans are in place across the organisation, so the necessary resources and planning are in place to maintain colleagues' skills and competencies
- With the Head of People, ensuring that annual training records are reported to Board.

The Executive (and Board) are responsible for:

- Ensuring that the organisation-wide safeguarding training plan is adequately resourced and reviewed on an annual basis
- Monitoring the frequency of supervision and ensuring that individual training and development needs are identified through supervision and the annual PDR process.

5. Resources

Independent People will ensure adequate planning, resources, and support for safeguarding training, including:

- An annual organisation-wide training plan for safeguarding and promoting the welfare of children and young people
- Adequate financial resources
- Adequate resources for e-learning opportunities
- Releasing colleagues to attend the appropriate training courses, training tasks, e-learning and to apply their learning in practice
- Resources for training and multi-agency initiatives designed to safeguard and promote the welfare of children and young people, such as specialist training and/or providing colleagues who contribute to the planning, delivery and/ or evaluation of such training
- Making colleagues available to support local authority safeguarding partnerships and/or sub-groups.

Maintaining training records, monitoring, review, and reporting

- People HR will be regularly updated with safeguarding training attended
- Performance reports will be provided annually to SLT and Board on the proportion of colleagues trained to the required level
- Wider safeguarding training needs will be reviewed regularly and in discussion with managers to maintain colleagues' skills and competencies

Support and supervision

Working to ensure children and young people are protected from harm requires sound professional judgements to be made. It is demanding work that can be distressing and stressful.

All colleagues have access to advice and support from their line manager, and those providing supervision will be trained in supervision skills and have attended relevant safeguarding training.

Reflective supervision will address:

- Support and reflection on safeguarding practice
- Management of performance and practice in relation to safeguarding and promoting the welfare of children and young people

- Professional development, including ensuring relevant training is made available and attended

Appendix 5: Safeguarding Code of Conduct

Colleagues should also refer to [section 8](#) of this Policy.

1. Every young person should be treated equally and with dignity, with their safety and wellbeing central to each colleague's relationship with them.
2. All colleagues are required to be conversant with and follow Independent People's **Concerns at Work Policy** (Whistleblowing).
3. Where there are any safeguarding concerns that a colleague may have behaved inappropriately or where we receive information that may constitute an allegation, all colleagues are required to report this to a Designated Senior Manager as soon as possible, however trivial. This includes reporting concerns about colleagues from other organisations.
4. Colleagues should not enter a close relationship - social, physical, emotional or sexual - or form relationships with any young person outside of the range of our service specification.

Colleagues should not take young people to their homes, give out their personal telephone numbers or email addresses or connect with them via any social media sites (unless expressly authorised to do so) or befriend young people using personal online accounts, including e-mail, chat rooms and social networking sites.

5. Any inappropriate behaviour towards colleagues by a young person should be recorded and reported, and if this behaviour was witnessed by other colleagues, the witness (es) should also record and report what they witnessed.
6. Colleagues should avoid giving lifts to young people except to assist in the provision of housing and support services or as part of organised activities.
7. Colleagues must never threaten or physically punish young people in their care. Any use of corporal punishment is not permitted. This may be a criminal matter for the police and will be viewed as a disciplinary matter and may be considered as gross misconduct. The term corporal punishment should be taken to include:
 - Any application of force as a punishment; slapping; throwing missiles; rough handling
 - Punching or pushing in the heat of the moment in response to violence from young people.

Neither will any colleague make a physical intervention (restraint), where any other course of action is likely to fail, even if this is to avert the immediate and serious danger of personal injury to a child / young person, themselves or another person - our colleagues are not trained to do this safely. **For more information, colleagues should refer to the 1625IP Supporting Positive Choices and Behaviour Policy and Procedure**

8. Colleagues are required to follow clear procedures to prevent themselves or others from personal benefit when working with young people.

Independent People is not a specialist financial advice or welfare rights agency, and it is outside of colleagues' professional role to provide such a level of advice to young people on their finances. However, we need to recognise that, as part of their support role, colleagues inevitably find that money is an important issue in people's lives and need to be able to offer

basic budgeting, benefits, and debt advice to young people. Where there is a need for specific, detailed professional financial advice, young people will be referred to an appropriate internal or external service.

To ensure appropriate accountability, details of all interactions in relation to finance, e.g., budgeting, debt, benefits, are recorded by colleagues in detail and discussed through the supervision process.

All colleagues are required to account fully for any monies paid to Independent People or handled by Independent People's teams on behalf of a young person, for example, individual grants. When handling or accounting for any monies held by Independent People or Independent People's colleagues on behalf of a service user, colleagues must follow the relevant financial procedures which includes Independent People's **Property, Money, and Valuables (young people) Policy & Procedure**.

9. Colleagues must never take on the role of Lasting Power of Attorney for a person who uses our services, and if requested to do so, should discuss the situation with their line manager immediately, so that appropriate support and advice can be provided to the service user.
10. Gifts offered or given to colleagues by young people (or vice versa) must be reported to the line manager, so that a decision can be made on how the gift, or offer of a gift, should be dealt with.
11. All allegations or suspicions of abuse, including inappropriate behaviour, inappropriate relationships or corporal punishment by a colleague will be taken seriously and treated carefully and fairly in accordance with our **Safeguarding Policies**, the South West Child Protection Procedures, and the Safeguarding Adults Multi-agency Policy and, where appropriate, reported to the police as potential or actual criminal activity.
12. Inappropriate behaviour or relationships with any person using any of our services, outside the boundaries of our service specifications, including the list above is likely to additionally result in a disciplinary investigation being undertaken and may be considered as gross misconduct.

Appendix 6 – Ofsted – the protection standard (regulation 6)

The protection standard

- (1) — (1) The protection standard is that children are enabled to feel safe and that their needs are met.
- (2) In particular, the standard in paragraph (1) requires the registered person to—
- (a) ensure that children—
 - (i) are protected from harm;
 - (ii) are enabled to keep themselves safe;
 - (iii) have their individual needs met;
 - (iv) have 24-hour access to help in a crisis or emergency situation;
 - (b) prepare and implement child protection policies;
 - (c) ensure that the effectiveness of child protection policies is kept under review and ensure that, where appropriate, those policies are revised;
 - (d) comply with requests from a local authority to provide it with information relating to a child for which it is the accommodating authority;
 - (e) ensure that there is a suitable person representing the supported accommodation undertaking available to attend any meeting the accommodating authority may hold about a child;
 - (f) ensure that staff—
 - (i) are familiar and act in accordance with child protection policies;
 - (ii) have the skills to identify and act upon signs that a child is at risk of abuse, neglect, exploitation or any other harm, and act to reduce such risk;
 - (iii) work collaboratively with children to help them understand how to keep safe, by offering guidance and support on how to minimise any potential risk of harm;
 - (iv) work collaboratively with other professionals and agencies, and share information where relevant to keep children safe;
 - (v) support children to maintain appropriate and safe relationships with family, friends and other people who are important to them;
 - (vi) understand the relevant roles and responsibilities assigned to them by the registered person in relation to protecting children.

Guidance – extracted from the Department for Education – Supported Accommodation Regulations, and Quality Standards, March 2023

Working together

The duties and responsibilities of local authorities and others who deliver children’s services with regard to safeguarding children and young people, are set out clearly in the statutory guidance [Working together to safeguard children](#).

The specific responsibilities of the young person’s accommodating authority, for safeguarding children and young people who are looked after, are set out in [Children Act 1989: Care planning, placement and case review](#).

The specific responsibilities of local authorities and their staff in exercising their social services functions for supporting care leavers are set out in [Children Act 1989: planning transition to adulthood for care leavers](#).

The registered person should seek to involve the accommodating authority and the local authority where the setting is located, and other relevant persons whenever there is a serious concern about a young person's welfare. They are also required by the Regulations to notify the accommodating authority, Ofsted and other relevant persons about any serious events. The registered person should have regard to the local authority's self-harm and suicide prevention strategies and procedures (where available), should embed practices to reduce the risk of self-harm and suicide and, should provide information and support to those bereaved or affected by suicide.

Both the arrangements for contact between agencies and any contact details (telephone numbers, email addresses, etc.) should be included in the relevant plans agreed between the registered person and the accommodating authority and should be updated regularly.

There should also be information on who the young person can contact to receive on-call help in a crisis and emergency 24 hours a day and in the absence of staff on site.

Managing risk

The safety of young people in supported accommodation is paramount. The registered person should ensure that staff have the relevant skills and knowledge to identify safeguarding risks and early signs of poor mental health and know how to take action and/or escalate their concerns if existing resources are not available or flexible enough to meet the young person's needs. Staff should be aware of any additional risk that may be present in the event of an emergency placement—including where they may have limited information on the young person—and should have the relevant skills and knowledge to appropriately manage this risk and take action.

Staff should build trusting relationships with young people, enabling staff to understand the risks each young person faces. Staff should take reasonable precautions and make informed professional judgements based on the young person's individual needs, circumstances and level of autonomy when identifying a particular risk or following a particular course of action.

Staff should discuss the risk and/or concern with the young person and agree steps to mitigate it including what the young person can do to keep themselves and others safe as well as what further support the service can provide to safeguard the young person.

Where there are safeguarding concerns for a young person, their placement plan – discussed with the young person and agreed between the registered person and their accommodating authority – must include details of the steps the service will take to work with the young person to manage any assessed risks on a day-to-day basis (Regulation 9(3) of the Care Planning, Placement and Case Review (England) Regulations 2010)). Staff should work with other agencies where appropriate to help young people understand the risks they face, including risk-taking behaviour, and build on the young person's strengths and skills so that young people are supported and better equipped to make informed decisions.

Staff must share relevant information and decisions with the young person's accommodating authority and, where appropriate, other relevant agencies/professionals providing support, for the purposes of safeguarding the young person or others (Regulation 5(2)). Staff should inform the young person of any information sharing and explain the reasons behind the sharing. For further advice on effective information sharing to safeguard and promote the welfare of children and young people, see Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers.

A safeguarding culture and ethos

The registered person should build a strong safeguarding culture in settings across the service where young people are listened to, respected and involved in both the development of the service and decisions about the setting, taking into consideration any impact on young people of settings that also accommodate adults. Staff should have the knowledge and skills to recognise and be alert for any signs that might indicate a young person is in any way at risk of harm and should know what to do when they have concerns. The registered person should ensure that skills in safeguarding are gained, refreshed as needed and that training is recorded in the Workforce Plan.

The registered person must have written safeguarding policies that outline any rules for the service for the purposes of safeguarding the young people in the service, which may be tailored according to the needs of each cohort in a particular setting. These policies should be shared with staff during their induction period and available to all young people in a format that is easily accessed and understood by each young person before or when they arrive at the setting and must be clear and user friendly.

Staff should do everything they can to ensure young people feel and are safe. Staff should support young people to be aware of and manage their own safety where possible, both inside and outside the setting. Staff skills for safeguarding should include being able to identify signs that young people may be at risk and support young people to get the help they need to stay safe and reduce risks. Staff should encourage young people to express their views about whether they feel safe both within and outside the setting.

All staff should strive to build positive relationships with young people in the setting and develop a culture of openness and trust that encourages them to be able to tell someone if they have concerns or worries about their safety or well-being. Staff should establish good links with external agencies that can support and help young people. Staff should include information in the young person's guide on how young people can contact their accommodating authority to call for a review of their care/pathway plan if they have concerns about their own safety or welfare. Settings must ensure young people understand how they can speak to an independent advocate, Independent Reviewing Officers (IROs), their Personal Advisor, Ofsted inspectors or other relevant persons if they have concerns about their own safety.

Young people should be encouraged to develop positive relationships with others both in and outside the setting, such as with professionals delivering floating support. However, staff should be alert to the possibility that young people may be at risk from some relationships including with other young people in the setting, staff, family members, friends, and others outside the setting, and they therefore should take appropriate steps to protect a young person where there are concerns for a young person's safety.

Staff should model and help young people to understand what makes a healthy, nurturing relationship. Staff should be skilled to recognise the signs and provide support to young people in danger of or involved in exploitative or damaging relationships with others and, where appropriate, provide guidance and advice to young people on how to keep themselves safe.

Supervision of staff practice should ensure that individual staff in the setting are engaged in the safeguarding culture of the service so they understand what they would need to do if they found other staff misusing or abusing their position to the detriment of the safety of a young person.

As part of the policies for protection of young people, the registered person should include information about whistle blowing, with clear procedures for how a staff member should report to an appropriate authority any concern they have about a young person within the setting being either at risk of, or already experiencing, significant harm. The policy should reflect the principles set out in the Francis review [‘Freedom to speak up’](#).

Supervision

Staff should have a good idea about the circumstances and routines of the young person by establishing and maintaining a good relationship with them. The registered person will need to ensure that arrangements are in place for staff to maintain regular and sufficient contact with the young person to be able to identify any safeguarding risks, mental and physical health issues, signs of harm, and/or if the young person has gone missing.

To safeguard all young people in the setting as well as staff, some settings may use a buzzer system for entry to the building after certain hours, use magnetic fobs, or if appropriate, have a suggested curfew. As the level of autonomy for young people in supported accommodation will often be high, it is not expected that they should need permission to leave and return to the setting for same-day outings, but it is expected that staff and young people maintain good communication regarding the young person’s whereabouts. Any rules or practices of the setting should be proportionate and balanced and should not unnecessarily hinder the young person’s autonomy.

Staff should explain why the rules are in place and evidence their benefit to ensuring a safe and secure setting.

Settings should have a policy on overnight stays that is commensurate with the needs, vulnerability, and autonomy of the young people accommodated at the setting. Specific arrangements for each young person may be put in place and must be in line with any agreements reflected in the young person’s relevant plans. It is expected that staff maintain regular communication with young people and encourage them to advise staff of planned overnight stays, where they will be staying, with whom, and a plan for return.

Policies and practices around overnight stays should be clear to staff and young people so that risks to a young person, including going missing, are mitigated and quick action can be identified and taken where there is cause for concern.

In most instances, young people should be allowed to receive visitors where they live. The registered person may—based on the needs of the young people accommodated in a particular setting and on assessed risks to the safety of young people and staff—put arrangements or practices in place for having visitors to the accommodation. For example, some settings may choose to set rules around recording visitor ID, visiting hours, visitor-approved rooms within the setting, pre-approved visitors, the number of visitors at the setting at any given time, or visitors

staying overnight at the setting. These practices and any associated policies should be reasonable, not excessive, and for the purposes of safeguarding all people in the setting. Any specific arrangements in place for a young person to receive visitors must be risk assessed and in line with the young person's relevant plans.

In supported lodging settings, as part of developing a strong and trusting relationship, it is expected that hosts and young people maintain good communication to ensure the comfort and safety of all those living in the host's home, including any other children. The host and young person should work together with the support of the social or support worker to set out and agree house rules, boundaries and expectations and promote a culture of open dialogue from the outset, so the young person feels at home. Any house rules agreed should be reasonable and for the purpose of ensuring the safety and security of all those living in the host's home as well as mitigating risk of danger or harm to the young person or any other person.

Safe accommodation

The accommodation must offer stability, be safe and must effectively protect young people from harm. Young people should not feel isolated as a result of their accommodation or support. The accommodation should enable a sense of belonging for young people, who should be supported by staff to participate in positive relationships in the local community.

The locking of external doors, or doors to hazardous materials, may be acceptable as a security precaution if applied within the normal routine of the setting. The design of the accommodation as well as the use of hazard-avoidance practices should reflect the characteristics of the young people accommodated in the specific setting.

Abuse

Young people should be supported by staff to understand what abuse is. They should be given information about how to report abuse or any concerns about possible abuse. They should be able to access, in private, relevant websites or help lines such as Childline to seek advice and help.

It is essential that young people are listened to and enabled to report any allegations at the earliest opportunity. Staff should report any allegation or disclosure of abuse immediately to the registered person. Any allegation of harm or abuse must be addressed in line with the provider's child protection policy

Each local authority should have clear arrangements in place for the management and oversight of allegations against people that work with young people. The relevant officer or teams within the local authority should be informed promptly of all allegations that come to the attention of a registered person or that are made directly to the police. For further information, including about the role of a local authority designated officer see [Working together to safeguard children](#). All allegations should be dealt with in line with the service's safeguarding policy (regulation 20) and should be notified to Ofsted in line with the requirements on the notification of serious incidents (regulation 27).

Child protection policies

As part of the requirements of the protection standard, the registered person has specific responsibilities to prepare and implement child protection policies. These include a safeguarding policy (regulation 20), a missing child policy (regulation 21) and a behaviour management policy (regulation 22). These policies must clearly set out the arrangements for the safeguarding of young people from harm, abuse, neglect or child criminal or child sexual exploitation, and the service's

procedures for referring child protection concerns to the accommodating authority or local authority where the setting is situated if appropriate, and specific procedures to prevent young people going missing and action to take if they do.

The child protection policies should be available and explained to young people and, where appropriate/relevant, their families as well as to all staff, whatever their role. The registered person must make sure that all staff are familiar with these policies and act in accordance with them, particularly, how to use them to report a concern.

The setting's policies and procedures around the protection of young people should reflect any requirements of other relevant legislation.

Appendix 7: Safeguarding and child protection resources

- [South West Child Protection Procedures](#) access to all South West Local Authority resources
- [Working Together to Safeguard Children, 2018](#)
- [NSPCC Signs, symptoms and effects of child abuse and neglect](#)
- [“What to do if you’re worried a child is being abused”](#)
- [Keeping Children Safe in Education DfE](#)

Making a referral

- South Glos [How to make a referral | SafeguardingSouth Gloucestershire Safeguarding \(southglos.gov.uk\)](#) Note – new form launched July 2023
- Bristol [Welcome to the Keeping Bristol Safe Partnership website. \(bristolsafeguarding.org\)](#)

Local Authority Threshold’s Guidance

- Bristol – [Welcome to the Keeping Bristol Safe Partnership website. \(bristolsafeguarding.org\)](#)



Keeping Bristol Safe
Partnership-effective-



Keeping Bristol Safe
Partnership-indicator:

- South Glos - [The-Right-Help-in-the-Right-Way-at-the-Right-Time-January-2021.pdf \(southglos.gov.uk\)](#)



South Glos
The-Right-Help-in-the

Local Authority Professional Disagreement guidance

- Bristol – [Welcome to the Keeping Bristol Safe Partnership website. \(bristolsafeguarding.org\)](#)
- Bristol – escalation monitoring form [kbsp-escalation-procedure-monitoring-form.docx \(live.com\)](#)
- South Glos – [Resolution-of-Profesional-Differences-Policy-December-2022.pdf \(southglos.gov.uk\)](#)

Child Exploitation

- [Child Sexual Exploitation: Definition and Guidance for Practitioners](#)
- [Barnardo’s BASE](#) - provide support to protect CYP at risk of child sexual exploitation
- [Exploitation Identification Tool](#) South Gloucs – for use in cases of sexual or criminal exploitation, county lines, modern slavery / trafficking, serious youth violence

County lines

- [Govt Guidance for professionals on criminal exploitation of children & vulnerable adults](#)

Radicalisation

- [HM Government Prevent 2022 programme](#)
- [Act Early](#) – spot the signs, advice, support, and Channel programme information

Online safety:

- [CEOP \(Child Protection & Online Protection Command\) report incident or concerns of online abuse](#)

- [Internet Watch Foundation](#) - anonymous and confidential child sexual abuse images reporting
- NSPCC [helpful advice and tools](#) to help keep young people safe online
- [South Gloucestershire Online Safety resources](#)
- [UK Council for Internet Safety Digital Resilience Framework](#)
- [CEOP resources for awareness raising of online child abuse and exploitation](#)

For children and young people:

- [Young person's guide - Working Together to Safeguard Children](#)
- General online safety advice <https://www.childnet.com/help-and-advice/11-18-year-olds>
- Staying safe online <https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/staying-safe-online/>
- Mobile safety <https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/mobile-phone-safety/>
- Bullying & cyberbullying <https://www.childline.org.uk/info-advice/bullying-abuse-safety/types-bullying/bullying-cyberbullying/>
- Homophobic, biphobic or transphobic bullying <https://each.education/homophobic-transphobic-helpline>
- Mental health support <https://www.otrbristol.org.uk/>
- Sex. Relationships. The internet. https://www.thinkuknow.co.uk/14_plus/

Legislation

- [Working Together to Safeguard Children, 2018](#)
- [Children Act 2004](#)
- [Children and Families Act 2014](#)
- [Education Act 2002](#) the relevant safeguarding part is section 175
- [Female Genital Mutilation Act 2003](#), amended by the [Serious Crime Act 2015](#)

Modern Slavery, Human Trafficking, and Smuggling

- [Modern Slavery, Human Trafficking and Smuggling | The Crown Prosecution Service \(cps.gov.uk\)](#)
- [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK \(www.gov.uk\)](#)

Safeguarding and Homelessness – Homeless Link have produced 6 'bitesize' (30 minute) filmed sessions about

- *Understanding Care Act 2014 for people experiencing multiple exclusion and homelessness*
- *Adult safeguarding and homelessness – importance of fact finding and submitting quality safeguarding referrals*
- *Mental Capacity Act and what good practice looks like*
- *Supporting People from abroad with restricted eligibility to access accommodation*
- *Working with young people and care leavers at risk of homelessness*
- *Prison release and hospital discharge – continuity care responsibilities*

[Bitesize learning: Supporting adults and young people through safeguarding | Homeless Link](#)

Version #	Owner	Issued date	Date of next review
1 – 6	Senior leaders	To 2020	December 2021
7	Operations Director	10 December 2021	April 2022
8	Operations Director	30 August 2022	August 2023
9	CEO	6 th June 2023	August 2023
10	Operations Director	August 2023	August 2024

Approved by Board:

Approved by Chief Executive:




Nick Hooper, Chair of Board

Dom Wood, Chief Executive

Date: 31 August 2023

Date: 31 August 2023