



**SAFEGUARDING  
(CHILD PROTECTION)  
Wiltshire Homes  
POLICY AND PROCEDURES**

**February 2020**

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## **Policy Rationale and Scope**

Legislation and guidance has established a statutory duty on all bodies who work with children and young people to ensure their welfare and safety is at the heart of our work and that participation in inter-agency procedures is essential if the interests of children and young people are to be safeguarded. DfE guidance 'Safeguarding Children and Safer Recruitment in Education' (2011), makes clear that safeguarding is broader than child protection and covers such issues as a child's health safety and security, promoting positive behaviour, countering bullying and providing medical assistance when required. This policy focuses primarily upon child protection. These other aspects of safeguarding are covered in other policies (see linked policies section at the end of this document).

Arc HD Services Ltd fully recognises its responsibilities for safeguarding and promoting the welfare of young people (as outlined in Section 11 Children Act 2004 and in the Protection of Children Standard of the 2015 Children's Homes Regulations). The aim of the policy is to promote a consistent approach understood and adopted by all staff in the prevention, detection and reporting of abuse with regard young people in the Home. The policy applies to all staff working at the Arc HD Services Children's Homes. All staff are required to sign to say they have read and understood all aspects of this policy.

## **Policy Statement**

All young people we work with are effectively protected from abuse. The 1989 Children Act's overriding principle is to promote and safeguard the welfare of children. The commitment of Arc staff is to ensure all young people we work with are effectively protected from any form of abuse.

### **Part 1 - Introduction to Child Protection Policy – Some Key Principles**

This policy has been prepared by Arc HD Services Ltd and follows government recommendations in respect of inter-agency co-operation for the protection of children from abuse. This document must be read in conjunction with Wiltshire Safeguarding Children Board's (WSCB) child protection procedures which can be found by visiting the website. This policy reflects these local procedures.

The web link for this site is:

<http://www.online-procedures.co.uk/swcpp/>

The guidance in this policy is based on the provisions made in:

- The Children Act 1989 and 2004
- The Education Act 2002
- Safeguarding of Vulnerable Groups Act 2006
- The Protection of Children Standard within the 2015 Children's Homes Regulations
- WSCB Policy for Managing Allegations against Staff and Volunteers 2017
- 'Working Together to Safeguard Children' – a guide to inter-agency working to safeguard and promote the welfare of children 2018

- Safeguarding Children and Safer Recruitment in Education Guidance (DFES 2011) issued to support education organisations in meeting their responsibility to safeguard and promote the welfare of children and young people under section 175 and 157 of the Education Act 2002
- The DfE Prevent duty June 2015 - making clear the Home's responsibility to protect young people from being radicalised, to identify those at risk of radicalisation and report concerns as they arise
- The Home Office 'Criminal Exploitation of children and vulnerable adults: County Lines guidance September 2018 - making clear the Home's responsibility to protect young people from criminal exploitation, to identify those at risk and report concerns as they arise

## **Multi Agency Co-operation**

Child protection procedures are only effective when staff in the Home understand the concept of multi-agency and multi-professional working. Good communication and co-operation between all involved agencies is essential and their individual operational goals must be set aside to meet the priority of protecting children and young people.

## **Anti-Discriminatory Practice**

Young people have a right to be cared for and protected in a way which recognises and values their uniqueness. Staff in the Home recognise this and ensure that societal inequalities based on class, race, gender, sexual orientation or disability do not impact on young people in the Home.

## **Confidentiality**

There are strict rules of confidentiality for all agencies involved with safeguarding children when dealing with child protection issues. The safety of the young person depends on how effectively and appropriately agencies share and exchange information when there is a concern. Meetings take place in which confidential issues are discussed. Information shared at such meetings should remain confidential and no member of staff attending from the Home should share this outside of this meeting without first consulting one of the Designated Safeguarding Officers for the Home.

Young people's wish, need and right to speak in confidence to staff about issues that concern them are to be respected. Young people are informed however that information may not be able to remain confidential if to keep it so were to place others or the young person at risk of significant harm.

## **Young People's Rights**

It is the local authority's responsibility in law to 'safeguard and promote the welfare of the child'. The key child protection principle is that the child's safety and welfare is the paramount consideration. The Home embraces this principle and ensures that staffing levels in the Home allow this to be always reflected in practice.

## **Believing Young People**

Staff are expected to listen to and believe what young people say. Staff are provided with guidance through child protection training to help them sensitively and professionally support young people who disclose abuse.

## **Educating Young People to Stay Safe**

It is important to make young people aware of behaviour towards them that it is not acceptable and how they can help keep themselves safe. Where appropriate young people in the Home will be taught:

- To recognise and manage risks in different situations (including social media websites)
- To judge what kind of physical contact is acceptable and unacceptable
- To recognise when pressure from others (including people they know) threatens their personal safety and develop strategies for resisting such pressure; including when and where to get help

## **Parents' Right to Information**

Parents need to know the reason for any professional concerns that may arise in relation to their child and it is important that they are kept informed where appropriate. Openness and honesty and the ability of staff to use appropriately the authority vested in them, form the basis on which a foundation of understanding between parents and staff in the Home is established.

When there are concerns about the wellbeing of a young person in the Home as a result of either:

- alleged abuse by staff or other residents
- a safeguarding concern no matter how small and not necessarily linked to abuse

Parents are informed in conjunction with the local authority by the Home's Designated Safeguarding Children Officer who ensures they are regularly updated at every stage of any investigation and subsequent action taken. Detailed records are maintained by staff in the Home which detail when parents are informed throughout the process.

In situations where there are concerns as to the wellbeing of a young person which arise while the young person is outside of the supervision and care of staff in the Home, the placing authority is informed and decides the manner in which parents / carers are informed and when. Examples of this may be:

- A young person disclosing abuse or neglect which occurred while with family members at home
- A young person returning to staff at the Home with unexplained bruising / injuries

The placing authority is responsible for ensuring parents / carers are informed as soon as possible and when this is not deemed to put the young person at risk.

## **Making Reporting Procedures Quick and Easy to Follow**

The prompt and correct reporting of child protection concerns is essential in ensuring young people are kept safe. This policy identifies the clear recording and reporting process which staff must follow if they suspect that a young person in the Home has been abused or is at risk of harm. This ensures staff act confidently and

without hesitation in response to concerns raised. The procedure is outlined in Section 5 and a detailed flow chart and a reporting and recording checklist is kept in the Home's Safeguarding File for staff reference.

## **Part 2 – Definitions and Recognition of Child Abuse**

All staff in the Home are aware of the four main categories of abuse and receive training to help them recognise the signs of abuse for each of these categories.

### **Physical Abuse**

May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, biting, 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 or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women and children also commit acts of sexual abuse.

The emergence of the sexual exploitation of children by individuals and groups within society has raised additional concerns for the safety of children. Sexual exploitation can take many forms from the seemingly 'consensual' relationship where sex is exchanged for attention / affection, accommodation or gifts, to serious organized crime and child trafficking. Exploitation is identified when there is an imbalance of power within the relationship. The perpetrator holds some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops. Sexual exploitation of young people should not be regarded as criminal behaviour on the part of the child or young person.

### **Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child. 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capacity, as well as over protection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another (for example, witnessing domestic violence in the family home). It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of child maltreatment.

## Neglect

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

- 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).
- Ensure access to appropriate medical care or treatment.

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

**Note:** These definitions come from HM Govt inter-agency guide 'Working Together to Safeguard Children' 2018.

## Possible Signs of Physical Abuse

Children injure themselves quite regularly. The difference between 'non-accidental' and 'accidental injuries' is key in determining whether a child may be suffering physical abuse.

### Non-accidental Injuries – Bruises

Bruises are likely to be frequent and patterned e.g. finger and thumb marks. Old and new bruises are likely to be found in the same place (note changing colour denoting different ages). Bruises are likely to be found in unusual places where children don't naturally fall or bruise – for instance, the back of the legs and on the back or front of the body - even on the ears. Bruises which are accidental tend to occur on the bony parts of the body – elbows, shins and knees.

Bruises may be symmetrical on both sides of the body or arms suggesting the child has been aggressively gripped. The child or parent may offer an unconvincing explanation as to how the bruises occurred.

### Non-accidental Injuries – Burns and Scalds

Non-accidental burns and scalds may have a neat or clear outline as if deliberately applied to a specific area (for instance, a neat circular cigarette burn). Burns to both hands may be symmetrical suggesting enforced scalding rather than an accidental spill from a boiling kettle. Significant scalds are a concern as everyone's instant reaction to hot water or steam is to speedily remove oneself from the cause of pain resulting in a minor scald rather than a significant one.

### Non-accidental Injuries – Other

Bites are a concern where the teeth marks reveal an adult bite pattern rather than that of a small child. Finger nail marks and deep scratches or incisions may raise suspicion. Fractures are likely to be numerous and healed at different times. Also may be in unusual areas – ribs, jaw, as opposed to arms or legs.

## **Possible Signs of Sexual Abuse**

### In Children Aged 12 Years or Over

The child may:

- Be chronically depressed or suicidal.
- Use drink or drugs to excess or run away frequently.
- Self-mutilate, show self-hatred.
- Become anorexic or bulimic.
- Experience memory loss.
- Have soreness or bleeding in the genital or anal area or in the throat.
- Be fearful of certain relatives or friends / find excuses not to go home or to certain places.
- Have recurring nightmares or be afraid of the dark.
- Be unable to concentrate or be in a 'world of their own'.
- Have chronic ailments such as stomach pains or headaches.
- Sexually abuse another child.
- Have unexplained sums of money.
- Display extremes of sexual behaviour, promiscuity or revulsion of sex.

## **Possible Signs of Emotional Abuse and Neglect in School Age Children**

Indicators that a child has suffered / is suffering from emotional abuse or neglect can take the form of physical, developmental and behavioural.

Physical indicators may include short stature, poor hygiene, unkempt appearance, repeated infections and infestations.

Developmental indicators may include the presence of learning difficulties, poor coping skills, social and emotional immaturity and low self-esteem.

Behavioural indicators may include disordered or few relationships, self-injurious behaviour, anxious or ambivalent attachments, indiscriminate affection displayed, aggressive and impulsive behaviour.

## **Bullying**

Although bullying is not defined as a form of abuse in Working Together to Safeguard Children 2018, there is clear evidence that it is abusive and will include one or more of the defined categories of abuse. Bullying can be defined as a persistent and / or deliberately hurtful behaviour toward another person aimed at causing embarrassment, discomfort or distress. It can take many forms, but the three main types are:

- Physical (hitting, spitting, kicking, unwanted physical contact, blocking someone's path, theft)
- Verbal (discriminatory or derogatory remarks, name calling, threats – in person or via social media postings)
- Emotional / Indirect (isolating someone from the activities and social acceptance of their peer group)

The impact of bullying on individual young people can frequently be underestimated and subtle forms of bullying can be missed. Bullying can cause considerable distress to children affecting their mental and physical



health and wellbeing. The Home has in place an anti-bullying policy and identified strategies to address bullying issues before they become established.

## **The Risk of Extremism and Radicalisation**

The risk of extremism and radicalization is now clearly identified by the Government as a safeguarding issue.

People who are vulnerable to becoming involved in terrorism can be any age, from any group, faith, ethnicity or background. Factors which are associated with a person who becomes vulnerable to being drawn into terrorism are:

- Peer Pressure
- Family tensions
- Crime and anti-social behaviour
- Lack of self-esteem and positive identity
- Personal or political grievance
- Mental health issues
- Learning or communication difficulties
- Influence of internet sites
- Isolation and poor support networks

The Counter Terrorism and Security Act 2015 require Children's Homes to take steps to prevent young people from being drawn into terrorism through the DfE PREVENT duty (June 2015).

Radicalisation is a gradual process which happens over time. Terrorist organisations target the vulnerable and disaffected members of society via social media and internet sites. Staff in the Home are well informed as to the potential risks and are well placed to observe gradual behavioural changes which may indicate a young person is at risk of becoming radicalised and report these concerns appropriately. The Home's E-Safety policy and PREVENT Risk Assessment further identify how young people are supported to make use of social media and internet sites safely and how staff will respond if risks emerge for young people.

Young people in the Home are provided with continual individual support through the waking day and provided with safe places and regular opportunities to discuss controversial issues such as extremist beliefs and ideologies. The Home has a focus on developing personal resilience in young people and positive support networks, both of which are essential in reducing the future risk of radicalisation.

## **Criminal Exploitation (County Lines)**

County lines is a major issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons. County lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults.

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

Child Criminal Exploitation is common in county lines and occurs 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. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology and often starts with being befriended on social media.

Staff in the Home are well informed as to the potential risks and are well placed to observe gradual behavioural changes which may indicate a young person is at risk of becoming criminally exploited and report these concerns appropriately. The Home's E-Safety policy identifies how young people are supported to make use of social media and internet sites safely and how staff will respond if risks emerge for young people.

### **Female Genital Mutilation (FGM)**

There are a range of potential indicators that a young person may be at risk of FGM. A young person at immediate risk of FGM may not know what's going to happen. But she might:

- Talk about being taken 'home' to visit family
- Mention a special occasion to 'become a woman'
- Talk about an older female relative visiting the UK
- Become withdrawn or run away from the Home or school.

While individually these may not signify risk, if there are two or more indicators present, there could be a possible risk to the young person.

A young person who has been the victim of FGM may display the following behaviour:

- Have difficulty walking, sitting or standing
- Spend longer than usual in the bathroom or toilet
- Display unusual behaviour following an absence from the Home
- Be particularly reluctant to undergo usual routine medical examinations
- Request help from staff, but may not be specific about the problem due to embarrassment or fear

Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Where a concern relating to possible FGM is identified, staff should follow established local safeguarding procedures using protocols outlined in the Home.

## **Part 3 – Preventing Abuse**

Whilst some young people are survivors of abuse which occurred prior to admission, there remains the possibility of further abuse during a young person's stay in the Home. The perpetrator could be another young person in the Home, a staff member, a visitor to the Home, a member of the young person's immediate family or anyone the young person has befriended from outside of the Home. The young person could also be at risk of significantly harming themselves.

## Preventing Abuse by Adults

The Home adheres to strict recruitment and selection checks which are outlined in Section 7 of this policy. Potential staff are expected to undertake a visit to the Home to meet existing staff team members and young people. In this way their suitability can be assessed by the staff team and young people, whose comments are recorded on a 'home visit assessment form'. The comments gathered determine whether a formal interview is offered or not.

The possibility of abusive practice is openly acknowledged at the Home. Staff are encouraged to analyse their own relationships with young people and colleagues. Collusive relationships are challenged as are punitive or authoritarian interactions. The Home's routines are organised to prevent the development of exclusive or isolating relationships between staff and young people.

The Home promotes a culture of collegial support and observation to ensure that all staff work in a professional manner which does not leave them vulnerable to allegations of abuse. This approach is promoted through the internal child protection training that staff receive. There is a Whistleblowing Policy which further outlines the responsibility of staff to raise issues both internally and externally of the Home if concerned about the practice or motives of colleagues.

In addition the Home will refer the names of individuals considered unsuitable to work with children and young people to a Department of Health Consultancy list, along with List 99, PoCA list and PoVA list in accordance with the Protection of Children Act 1999 and The Protection of Vulnerable Groups Act 2006.

## Preventing Involvement in Child Sexual Exploitation or Abuse from Unknown Adults

High supervision levels in the Home minimise the risk of young people becoming involved in sexual exploitation. Young people are closely supervised throughout the day and monitored regularly through the night (in situations where night time observation is requested or required) in accordance with requirements of their Risk Management Plan, agreed upon admission and reviewed at subsequent team meetings.

Staff are expected to alert the Home's on duty Designated Child Protection Officer should they witness unauthorised persons attempting to contact young people and to contact the Police immediately in situations where an unknown / unauthorised adult is attempting to remove the young person from their care.

The on duty Designated Child Protection Officer will make contact with the Police where evidence exists that suggests a young person in the Home is a victim of attempted or actual sexual exploitation or is being / has been inappropriately accessed by an unauthorised person.

## Preventing Significant Self Harm

Young people in the Home may be susceptible to periods of high anxiety and emotional instability. It is further recognised that some young people may act impulsively, or self-harm as a way of coping with emotional distress. Some young people may have a history of attempting suicide or of para suicidal behaviour. The furniture and furnishings within private spaces such as bedrooms and bathrooms are of a type which minimizes opportunities to self-injure. High staffing levels of at least 1:1 staffing through the young person's waking hours further prevent them from placing themselves at significant risk in this way.

## Preventing Abuse from Other Young People

High staffing ratios of at least one member of staff for each young person in the Home significantly minimises the opportunity for young people to experience abuse from others residing there. Each young person also has their own living area in addition to their private bedroom further reducing the opportunity for bullying to occur. The Home has an Anti Bullying Policy which details measures taken to prevent emotional harm being experienced by young people.

## Speak Out Opportunities for Young People

Children have a wide range of opportunities to speak out about concerns and a number of avenues in which they can do so.

Individual staff support is provided to each young person throughout their waking day and young people have their own living rooms enabling ongoing opportunities to talk to staff about concerns in privacy.

Young people are encouraged to share with staff their experiences of being looked after and offer ways in which staff can better support them. This 'receptive to feedback' culture is in line with the Home's ethos of developing therapeutic relationships with young people, which in turn reduces young peoples' inhibitions in raising issues or worries.

In addition to the opportunities to speak to staff, all young people are made aware of those they can talk freely to from outside of the Home. These include:

- Childline
- Local Social Care Referral and Assessment Teams
- Local Police
- Independent Advocate who visits on a regular basis and can be contacted by phone if required
- The Independent Visitor who conducts monthly monitoring visits on the Home (Regulation 44) and meets with young people
- Independent Advocacy Services
- CEOP 'contact button' on Arc website

This information can be found in the young person's guide to the Home and is regularly discussed with young people.

## Prevention through Staff Training

Staff are vigilant to the signs of abuse through the child protection training receive. Staff in the Home are provided with training to enable them to put child protection principles into practice. The training programme includes:

- Categories of Abuse and How they are Defined
- Possible Signs of Physical Abuse
- Possible Signs of Sexual Abuse
- Possible Signs of Emotional Abuse and Neglect in School Age Children
- Possible signs of a young person becoming radicalised

- How Attitudes and Beliefs Influence our Judgement
- The Local Authority Responsibility to Safeguard Children
- Section 47 Enquiries – What Happens when Child Protection Concerns are raised with the local authority
- How to Respond to Allegations of Abuse Shared with you by a Young Person in the Home

Additional training regarding the risks of child sexual exploitation (CSE), e safety and radicalization are also undertaken by all staff in the Home.

Additional advice is available to staff in the Government document, 'What to do if you are worried a child is being abused'. This is more general advice but the principles remain.

Ref: <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused>

## **Part 4 – Designated Roles and Responsibilities**

### **Safeguarding Roles and Responsibilities within the Home**

The following roles have been discussed with WSCB's Quality Assurance Lead, Julie Upson and have been approved as meeting the requirements of the WSCB Policy for Managing Allegations against Staff and Volunteers.

#### **Named Senior Officer (NSO)**

The NSO is responsible for ensuring:

- Arc complies with standards identified and agreed by the WSCB for managing allegations
- WSCB procedures for managing allegations are reflected and implemented within Arc
- the workforce is aware of and implements the procedures in relation to all allegations against staff who work with or on behalf of children
- the key roles of Named Senior Officer (NSO) and Senior Manager (SM) are reflected in the safeguarding policy and procedure
- effective reporting and recording arrangements are in place

The Named Senior Officer for Arc is Keith Bidwell

#### **Designated Safeguarding Children Officers (known as Senior Managers in WSCB policy)**

There are a number of Designated Safeguarding Children Officers (DSCO) who fulfil this role on a rostered basis throughout the year.

The DSCO's are responsible for assessing the information recorded and reported to them by staff team members and if appropriate, ensuring child protection concerns are correctly recorded and promptly reported to the relevant authorities. They are also responsible for ensuring the maintenance of ongoing records of any action required as a result of the concerns being raised. They ensure good communication occurs between involved professionals and for ensuring the staff team are updated throughout any investigation and of actions required as a result of the investigation.

Where there are concerns or an allegation is made against a member of staff the DSCO is responsible for:

- providing advice, information and guidance to staff and ensuring appropriate liaison with the local authority Designated Officer (formerly known as LADO) where the criteria for referring is met
- ensuring additional information is gathered which may have a bearing on the allegation
- providing the subject of the allegation with information and advice
- recording all discussions and attending strategy meetings as required
- ensuring risk assessments are undertaken where and when required
- ensuring that effective reporting and recording systems are in place to allow for the tracking of all allegations through to the final outcome
- referring as appropriate to the Disclosure and Barring Service (DBS) or other bodies/professional organisations

All DSCO's have completed accredited Designated Safeguarding Officer training to enable them to undertake this role.

DCSO's are further assisted in ensuring that concerns raised are correctly recorded and reported in a timely fashion by the reporting and recording checklist located in the Safeguarding File.

### Support Worker

All support workers have a statutory responsibility to protect the rights of young people in our care. In all issues of young people's protection, the responsibility of each and every staff member is exclusively towards the young person and not the Home setting.

Staff have a duty to record on the Home's 'Child Protection Concern Form' and report to the Home's Designated Safeguarding Children Officer the following:

- Any safeguarding concern, no matter how small and not necessarily linked to abuse
- Any disclosure of abuse
- Any observation which suggests abuse has occurred
- Any information about possible abuse

The Home's DSCO will assess the information discuss further with the staff member completing the form and decide whether the issue requires formally reporting externally.

All discussions with external agencies must be recorded to include:

- Contact person
- Date
- Time
- Follow up action required and by whom

Similarly it will be the responsibility of the staff member to contact the relevant agencies should a situation occur where both the Home's DSCO's are the subject of allegations of abuse by young people.

## Safeguarding Roles and Responsibilities External to the Home

### Local Authority 'Designated Officer' (formerly known as LADO)

The Designated Officer is a named person or persons within the local authority in which the Home is situated who must be informed when there is an allegation made by a young person that they have been abused or harmed by staff in the Home or if staff have concerns that a young person has been harmed by staff working in the Home.

The Designated Officer is forwarded written accounts and will determine what action is required of the Home and any ongoing investigation required. They have responsibility for managing and overseeing individual allegations relating to staff. The Designated Officer should provide advice and guidance to the Home, liaising with the Police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. They also co-ordinate the collation of reports to provide information to the Local Safeguarding Children Board (LSCB) and Department for Education (DfE).

Any contact with the Designated Officer and subsequent action required by them is recorded in the Home's Child Protection log. The DCSO ensures this log has been correctly completed.

The Designated Officer is only contacted with regard allegations relating to staff. Contact details for the Designated Officer can be found on the Home's Internal Safeguarding Reporting Procedure located in the Home's Safeguarding file.

### Multi Agency Safeguarding Hub

The local Multi Agency Safeguarding Hub (MASH) provides triage and multi-agency assessment of safeguarding concerns in respect of vulnerable children and adults. It brings together professionals from a range of agencies into an integrated multi-agency team. The MASH team makes assessments and decisions in response to child protection concerns.

The local MASH is based in Wiltshire and shares information from every agency to decide the most appropriate intervention in response to child protection concerns raised. Details for the Wiltshire MASH can be found at:

<http://www.wiltshire.gov.uk/healthandsocialcare/childrenyoungpeople/childprotection/mash.htm>

The MASH is responsible for carrying out and co-ordinating any safeguarding investigations regarding issues occurring within the Home. They are responsible for informing the young person (s) Social Worker and representative from the young person's Placing Authority, who will in turn inform parents / guardians where appropriate and if safe to do so.

Due to the close working relationship that the Home is likely to have with many parents / guardians, social workers and placing authorities, the MASH may in some circumstances give their approval for the Home to inform people directly.

The MASH is informed immediately by the Home's DSCO when there is a disclosure by a young person or a concern is identified by staff which indicates that the young person has been abused by a peer or someone not working at the Home.

Contact details for MASH are found in the Safeguarding file within the Home.

## Placing Authority and Social Worker

The placing authority and social worker for young people are informed by the Home's DSCO when a referral has been made to the Designated Officer regarding an allegation of abuse of a young person by a staff member.

The placing authority and social worker are informed by the MASH when a child protection referral has been made by the Home implicating a peer or adult not employed by the Home.

## Local Authority

Wiltshire Children's services are pro-active in regards to Safeguarding and Child Protection. They have clear expectations of all Children's Homes within Wiltshire and provide comprehensive guidance. The Registered Manager completes a six monthly audit of its Safeguarding and Child protection practice which is sent to Wiltshire Children's Services for review.

## **Part 5 – Recording and Reporting Procedures**

Any person who has a safeguarding concern however small; or who has knowledge or suspicion that a young person is being abused, or is at risk of abuse, has a duty to refer their concern to one of the following agencies with statutory duties and powers to investigate and intervene (Social Services, NSPCC and the Police). The usual route for such a referral is through the Home's DSCO.

The Home's overall recording and reporting procedure is identified below.

### **Procedure for Responding to a Young Person Safeguarding Issue**

A young person safeguarding concern may come to light in several ways:

- A young person may make a direct allegation to a staff member
- A young person may make a comment which seems to suggest abuse
- A young person may have bruises or marks
- A young person's behaviour may suggest the possibility of abuse
- An adult's behaviour may suggest that they are not a suitable person to care for young people

The initial allegation may come from the young person themselves, or another person. It is important to approach any allegation with an open mind, to listen and to take the information seriously.

There are clear sequential steps to take if staff suspect a safeguarding issue. These are in line with inter-agency procedures.

The Internal Safeguarding Reporting Flow Chart outlining the homes safeguarding reporting and recording procedure is located in the Home's Safeguarding file and is summarised below:

- On disclosure/observation/information about Possible Abuse or safeguarding concerns, staff must immediately report the safeguarding issue to the Home's DSCO.
- Child Safeguarding Concern Form completed and Home's DSCO informed



- Once the safeguarding issue has been reported to the Home's DSCO this must be recorded (what you have been told or observed) on the Safeguarding Concern Form.
- Do not attempt to investigate whether a young person has been abused. This responsibility lies with the social care services (MASH or local authority Designated Officer) and the Police
- The DSCO will then discuss with the staff member the content of their concern and consider whether a formal referral should be made
- Is a member of staff implicated in the alleged abuse?

### Yes

- a. The DSCO ensures contact is made with the local authority Designated Officer (formerly LADO) where the suspected abuse DOES involve / implicate staff. The Designated Officer must be informed of referrals within 24 hours
- b. In situations where the Designated Officer has been informed of an allegation of abuse, the DSCO will ensure the young person's placing authority and social worker have also been informed that a referral to the Designated Officer has been made and establish with them how and by whom parents / guardians are to be informed
- c. Note: Where the concern relates to the DSCO, staff must not contact this person. Instead they must contact without delay ARC's Senior Officer (Keith Bidwell) or another Director DSCOs (Martin Rose or Mark Johnson) who will make the referral to the local authority Designated Officer on their behalf.

### No

- a. If it is decided that a safeguarding concern exists and staff are not implicated in this, the DSCO will ensure local Multi Agency Safeguarding Hub (MASH) is contacted without delay
  - b. MASH are also to be informed in the first instance where there are concerns a young person is at risk of radicalisation
  - c. In situations where the allegation / suspicion of abuse identifies a peer in the Home as the perpetrator, the recording and reporting process identified above is followed for both the alleged victim and alleged perpetrator
- The DSCO will ensure any immediate action is taken within the Home required or advised by MASH or the Designated Officer to maintain the safety of the young person. The DCSO will ensure staff are informed of this action.
  - The DSCO will ensure a discussion has taken place with MASH (if involved) around the issue of informing the young person's placing authority, social worker and where appropriate parents / guardians and determine who is to complete this task
  - The DSCO to make a Regulation 40 notification to OFSTED if applicable and within 24 hours
  - The DCSO and supporting staff are further aided in ensuring all recording and reporting requirements (to all agencies) are completed within required timeframes by the completion of a Safeguarding Concern Reporting and Recording Checklist which is located in the Home's Safeguarding file.

Recording of information must be detailed, precise and factual to enable it to be used in court if necessary.

## **Appropriately Supervising and Supporting Staff When an Allegation has been Made**

The Home has clear procedures for reporting allegations against staff who work with children and young people that ensure incidents are appropriately investigated externally from the Home.

The subsequent investigation requires three strands to be processed and considered:

- The inter-departmental and inter-agency child protection investigation. Decisions will be made at a Strategy Meeting with respect to ensuring the continuing safety of the young person
- The Police investigation as to whether a crime has been committed by the staff member
- The Home's disciplinary procedure, which should address whether or not misconduct has taken place by the staff member

The aim is to ensure that young people are protected from the risk of harm first and foremost, while recognising there is a need to protect staff from potentially false or unfounded accusations.

### Staff Suspension

Suspension should not be an automatic response to an allegation and the need to suspend will depend on a number of factors including:

- the nature of the allegation of abuse
- the plausibility of the allegation
- the wishes of the young person
- the wishes of the implicated staff member
- witness statements to the incident
- the availability of alternative work which does not bring the staff member into contact with the young person
- the risk of evidence being tampered with
- the advice of the local authority Designated Officer and the young person's placing authority.

Although suspension on full pay is in law a neutral act, it is bound to be distressing for the accused person and disruptive for the young people in the Home. Where there are opportunities for the staff member to continue work without coming into direct contact with the young person or causing undue anxiety, these options are explored by the Home's DSCO with the local authority Designated Officer and the young person's placing authority.

The decision to suspend a member of staff if required is made by the Registered Manager and Responsible Individual of the Home in consultation with the local authority Designated Officer and the placing authority and social worker of the alleged victim.

In situations where suspension is required, staff will have access to professional support and will be kept regularly informed as to how the investigation is progressing.

## **Part 6 – Information Sharing and Whistleblowing**

### **Information Sharing**

Information shared between agencies, including the local Children's Services Dept and the Police must be treated with the strictest confidentiality and in line with the document 'Information Sharing:- Guidance for practitioners and managers (Department of Education) 2008. If sexual exploitation is suspected or disclosed, there is guidance in 'Safeguarding Children and Young People from Sexual Exploitation (DCFS 2009) on disrupting perpetrator behaviour, identifying possible criminal offences and evidence gathering, with a view to sharing information as such cases may already be under surveillance or monitoring by Police and criminal justice agencies who lead on this aspect of safeguarding children. Vigilance is particularly important in Children's Homes as these are often targeted by perpetrators.

If staff have a concern about safeguarding they must report this concern as outlined in this policy. Failure to report safeguarding issues is a Disciplinary offence.

The Children Act 2004 introduced a duty to co-operate to improve the wellbeing of children and young people and for agencies to work together.

Taking account of the information sharing guidance, where it is decided that parents / guardians should be informed, this must be managed in a planned way. The views of the child, any allegations which involve a parent or adult in the family, and the statutory responsibility for the child will determine how this is undertaken.

The local authority has a statutory responsibility to make further enquiries if concerns about the wellbeing of any child are expressed to them which meet their threshold for intervention. Staff from the Home should participate in the conference and should provide whatever information is deemed necessary.

Should a situation arise where a staff member disagrees with the decision of the Home's DSCO not to formally report an incident externally, they must do so themselves following the procedure outlined in Section 5 of this policy.

If a young person is the subject of a Child Protection Plan there will be a Key Worker who is likely to be the qualified Social Worker from the authority where the young person was living at the time. Close co-operation is required between staff in the Home and the Key Worker to ensure that the requirements of the authority are met. Regular Case Conferences will take place and it will be necessary to furnish the Case Conference with a report. In some instances it would be appropriate for the member of staff with the greatest contact with the young person to attend the conference.

The local authority in whose area the Home is situated has a statutory responsibility to call a strategy meeting / case conference if concerns about the wellbeing of a young person are expressed to them. Staff in the Home are expected to attend and contribute to Child Protection Conferences and Strategy Meetings when invited to do so.

## **Whistleblowing**

The Home has a comprehensive whistleblowing policy updated in response to The Whistleblowing Commission's Report on the Effectiveness of Existing Arrangements for Workplace Whistleblowing in the UK (November 2013) and the Freedom to Speak Up Report – An Independent Review into Creating an Open and Honest Reporting Culture in the NHS (February 2015).

The policy ensures that staff recognise the importance of raising workplace concerns and that they understand how to do so appropriately and with confidence. The policy further identifies how these concerns will be investigated and addressed and sets timeframes for resolving any concerns raised.

The policy aims to ensure a culture of openness is maintained within Arc HD Services Children's Homes in which whistleblowing is valued by all, as a means to maintaining high standards of care and safety to young people and staff.

The information given by a whistleblower is handled sensitively and dealt with in accordance with the rest of the safeguarding procedure.

## **Part 7 – Safer Recruitment of Staff**

The Home aims to offer a caring and protective environment for young people. Having confidence that staff employed in the Home will not pose a risk to young people is essential.

### **Employment Checks**

To protect young people from potentially predatory adults, the Home adheres to strict vetting procedures when recruiting staff. These procedures are in line with Safer Recruitment in Education Guidance (DfES 2011) and Wiltshire's Safer Recruitment Principles.

Link [http://wiltshirescb.org.uk/wp-content/uploads/2016/10/Safer\\_Recruitment\\_Principles.pdf](http://wiltshirescb.org.uk/wp-content/uploads/2016/10/Safer_Recruitment_Principles.pdf)

In addition The Registered Manager completes a six monthly audit of the Home's safer recruitment practice which is then sent to Wiltshire Children's Services. Both the Registered Provider and the Registered Manager hold current certificates that meet Safer Recruitment guidance.

Recruitment and selection processes are stringent and staff are subject to the following checks before taking up appointment:

- Enhanced level DBS (Disclosure and Barring Service) checks are undertaken on all staff prior to the commencement of employment in the Home. Additionally employers are required to make referrals to the DBS about individuals they believe pose a risk of harm to vulnerable groups and it is an offence not to do so.
- Two satisfactory references covering the last five years of employment and additional references taken where appropriate to establish competence in previous childcare work settings
- Identity checks and the right to work in the UK checked
- Photo identification verified and retained on file

- Occupational Health Questionnaires completed and checked
- Any employment gaps are discussed at interview stage
- Evidence of all checks are held in staff personnel files located in the Home

The homes 'Staff Recruitment, Selection and Retention' Policy describes in full the homes Safer recruitment procedures.

### **Agency Staff**

Agency staff references and recruitment checks (including enhanced level DBS checks) are the responsibility of the agency employing them, but must be confirmed in writing to the Home prior to any shift being worked. Agency staff are not routinely deployed in the Home, but may be sourced to cover periods of unexpected staff absence. The Home selects agency staff members when required which are already known to the young people in the Home and who have been assessed as able to work within the Home's therapeutic ethos and who have experience of working with the types of issues and needs that young people in the Home present.

Full details of the recruitment process can be found in the Home's Staff Recruitment, Selection and Retention Policy.

### **Reporting Cases to the Independent Safeguarding Authority (ISA)**

The Home's on duty DCSO must ensure that cases are referred to the ISA, even if a staff member ceases to work at the Home, where there are grounds for believing they are unsuitable to work with children and young people, or when they may have committed misconduct.

The authority will consider whether to prohibit the person from working with children and young people in the future or place restrictions on their employment in educational establishments.

The Protection of Children Act 1999 sets out the circumstances in which the Home must refer names to the ISA for consideration of inclusion in the barred lists. These circumstances are explained in the following document available from the Department of Health: 'The Protection of Children Act 1999 A Practical Guide to the Act for All Organisations Working With Children'

## **Part 8 - Physical Contact, Personal Care and Restraint**

### **Physical Contact**

Appropriate physical contact between staff and young people in the Home is encouraged. The Home's Personal and Professional Boundaries policy outlines to staff how to ensure this contact is positively received and not misinterpreted by young people. Staff are expected to conduct themselves in accordance with this guidance. This reduces the risk of young people and staff members misunderstanding physical contact or the intent behind such contact.

### **Personal Care**

Personal Care can be defined as 'attending to the physical needs of people who are disabled or otherwise unable to care for themselves, including tasks such as bathing, management of bodily functions'.

Staff in the Home do not routinely carry out personal care for young people as identified above. There may be circumstances in which, as a result of an ongoing or temporary disability preventing a young person from bathing or managing their bodily functions unaided, assistance is required from staff. In these circumstances, the young person, parents / carers and the local authority are consulted to agree a respectful and safe way for the young person to be assisted in completing these tasks. These tasks are only completed by staff when a written care plan or risk management plan is in place identifying the specific nature of the support to be provided and the number of staff required to be in attendance to do so.

## **Restraint**

On occasion physical intervention may be required to prevent young people in crisis from seriously injuring themselves / others or extensively damaging property.

The Home has a physical intervention policy (called Therapeutically Managing Aggression and Violence) which outlines the circumstances in which physical intervention is to be used. Further guidance is available to staff in 'Guidance on the Use of Restrictive Physical Interventions for Staff Working with Children and Adults who display extreme Behaviour in Association with Learning Disability and / or Autistic Spectrum Disorders', Guidance on the Use of Restrictive Physical Interventions for Pupils with Severe Behavioural Difficulties'.

Both of these are available at [www.teachernet.gov.uk/childprotection/guidance.htm](http://www.teachernet.gov.uk/childprotection/guidance.htm)

When restraint is necessary, a full report of the incident is made. Placing Authorities and parents are informed in line with communication agreements clarified upon the young person's admission to the Home and revised as appropriate in regular reviews.

Staff in the Home are trained in the Team Teach approach, which focuses on de-escalation and gradual and graded positive handling techniques. Further information about Team Teach can be gained by visiting their web site [www.team-teach.co.uk](http://www.team-teach.co.uk).

## LINKED POLICIES

- **E-Safety Policy**
- **Staff Recruitment, Selection and Retention Policy**
- **Anti-Bullying Policy**
- **Disciplinary Policy and Procedures**
- **Grievance Procedure**
- **Therapeutically Managing Aggression and Violence (Physical Intervention) Policy**
- **Behaviour Management Policy**
- **Managing Self Harm and Preventing Suicide Policy**
- **Whistleblowing**
- **Prevent Risk Assessment**
- **Criminal Exploitation of Children and Vulnerable Adults (County Lines Guidance) September 2018**

**Policy Review by Date: January 2021**