

# **Refreshing Minds Child Protection and Safeguarding Policies**

**December 2021**

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## 1. Key Contact Details

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### The Director and Head Leader:

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## **2. Policy Statement: THE WELFARE OF THE CHILD IS PARAMOUNT**

**2.1.** The organisations Child Protection and Safeguarding Policy and Procedures (**Policy**) has regard to statutory guidance *Keeping children safe in education September 2019* and *Working Together to Safeguard Children July 2018*, *Disqualification under the Childcare Act 2006* and *Prevent Duty Guidance for England and Wales 2015*, GDPR (May 2018) information sharing 2018 and:

- Is in line with locally agreed inter-agency procedures;
- Has been authorised by the trustees of the organisation;
- Is available in hard copy to parents on request;
- Can be made available in large print or other accessible format if required;
- Its procedures apply wherever staff, Governors or volunteers are working with girls even where this is away from the Organisation, for example on an outing.

**2.2.** A copy of this policy is shown to parents upon admission to the project and copies of this and other policies, including our whistle blowing policy, are kept in the organisations office. The organisations prime responsibility is the welfare and wellbeing of all girls in our care. We want to work with girls, parents and the community to ensure the safety of our girls. Safeguarding includes issues such as health and safety, bullying, meeting the medical needs of girls with medical conditions, providing first aid, Organisation security, and child protection. Child protection refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer significant harm.

We aim to create an environment which encourages children to develop a positive self-image, regardless of race, language, religion, culture or home background.

We aim to do this by:

- Helping girls to establish and sustain satisfying relationships within their families, peers and with other adults.
- Encouraging girls to develop a sense of autonomy and independence.
- Enabling girls to have the self-confidence and the vocabulary to resist inappropriate approaches.

- Working in partnership with parents to build their understanding of the commitment to the welfare of all our girls.
- Providing adequate and appropriate staffing resources to meet the needs of girls.
- Ensuring that all parents/guardians know how to complain about a staff or volunteers

The legal framework for this work is:

- ❖ The Rehabilitation of Offenders Act
- ❖ The Children Act 2004 as amended 2018
- ❖ Human Rights Act 1998
- ❖ Data Protection Act 1998
- ❖ GDPR 2018
- ❖ The Protection of Children Act 1999
- ❖ The Children's (NI) Order 1995
- ❖ The Children's (Scotland) Order

We also include current legislation as noted in the Hackney child Wellbeing Framework. [https://drive.google.com/file/d/1-H\\_N2p1-i8KdGMSjLhUU3jxRFx7CHnoo/view](https://drive.google.com/file/d/1-H_N2p1-i8KdGMSjLhUU3jxRFx7CHnoo/view)

We introduce key elements of child protection so that children can develop understanding of why and how to keep safe.

We create within the organisation a culture of value and respect for the individual.

We ensure that this is carried out in a way that is appropriate for the ages and stages of our children.

**2.3.** Central to the organisations wider aims of inspiring and nurturing our girls, so as to engender in them a deep passion for drama, dance and music, is the paramount importance which the organisation places on the safeguarding of its girls. At the heart of the foundation and wider aims are the values to which all members of the community aspire. These underpin the organisations commitment to the safeguarding of the children in its care:

- Hard work and service
- Trust, loyalty, tolerance, inclusiveness and honesty
- Conscientiousness, decency, forgiveness, compassion and gentleness.

**2.4.** Every girl should feel safe and protected from any form of abuse. The organisation is committed to safeguarding and promoting the welfare of the children in our care and expects all staff and volunteers to share this commitment. The organisation will take all reasonable measures to:

**2.4.1** ensure we practise safer recruitment in checking the suitability of Staff, Governors and Volunteers (including Staff employed by another organisation) to work with children and young people in accordance with the guidance given in:

- ❖ ***Disqualification under the Childcare Act 2006;***

- ❖ The *Education (Independent School Standards) Regulations 2014*;
- ❖ And the *Statutory Framework for the Early Years Foundation Stage*;

- 2.4.2 Ensure that where Staff from another organisation are working with our girls on another site, we require written confirmation that appropriate safer recruitment checks and procedures have been completed on those Staff;
- 2.4.3 Follow the local inter-agency procedures of the Safeguarding Children Board;
- 2.4.4 Follow the local inter-agency procedures of the Safeguarding Children Board:  
**Hackney** 020 8356 5500 - Out of hours duty team 020 8356 2710.  
**Haringey** 020 8489 3145 - Out of hours duty team 0208 489 0000
- 2.4.5 Be alert to signs of abuse both in the organisation and from outside, and to protect each child from any form of abuse, whether from an adult or a fellow girl in the program;
- 2.4.6 Deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with her agreed child protection plan;
- 2.4.7 Design and operate procedures which, so far as possible, ensure that leaders and others who are innocent are not prejudiced by false allegations;
- 2.4.8 Understand the additional barriers that exist for girls with SEND, thus ensuring that Staff is able to identify vulnerable children. The organisation identifies and monitors these young people, and early help is put into place as required
- 2.4.9 Be alert to the needs of children with medical conditions and operate robust and sensible health and safety and first aid procedures. The organisation takes our girls mental and emotional wellbeing seriously;
- 2.4.10 Assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local;
- 2.4.11 Identify children who may be vulnerable to radicalisation, and know what to do when they are identified
- 2.4.12 Operate appropriate behaviour and discipline procedures, including the use of reasonable force, and taking appropriate steps to manage any complex or challenging behaviour;
- 2.4.13 Operate clear and supportive policies on drugs, alcohol and substance misuse;

- 2.4.14 Consider wider environmental factors in a child's life that may be a threat to their safety/welfare – as referred to in **Working Together to Safeguard Children (2018)** and in **Keeping Children safe in Education (2019)** as **contextual safeguarding**
- 2.4.15 Provide a support network for all girls so that they know that there are adults in the organisation whom they can approach if they are worried about any matter.
- 2.4.16 Take all practicable steps to ensure that organisations premises are as secure as circumstances permit.
- 2.4.17 Consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the organisation or in the local area;
- 2.4.18 Have regard to guidance issued by the Secretary of State for Education (DfE) in accordance with s.94 of the Education and Skills Act 2008 and ss. 29 and 38 of the Counter-Terrorism and Security Act 2015, and associated regulations.
- 2.4.19 Exercises its mandatory duty to inform the local authority of children in **'private fostering'**
- 2.4.20 Statements about or allegations of abuse or neglect made by children will always be taken seriously and acted upon promptly.
- 2.4.21 The organisation recognises that it is an agent of referral and not of investigation; no action will be taken knowingly which might undermine a criminal investigation. Investigating agencies are Children's Services, Social Care and the Police.

**2.5. Keeping children safe in education 2019** defines safeguarding and promoting the welfare of children 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.

The Prevent Duty Guidance for England and Wales emphasises that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The organisation should be a safe place in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Organisation recognises that some girls may be in need of additional support even though they may not be deemed at risk of harm.

2.6. Other relevant policies that are available to staff and parents include:

- ❖ Recruitment Policy.
- ❖ Staff Conduct Policy.
- ❖ Whistleblowing Policy.
- ❖ Anti-bullying Policy.
- ❖ Behaviour and Discipline Policy.
- ❖ Policy on E-Safety.
- ❖ Lost missing or uncollected child policy
- ❖ Smoking, Alcohol, Drugs and Substances Policy

2.7. All staff must be trained to understand our Safeguarding Policies and Procedures, must have up to date knowledge of safeguarding issues. Staff should be able to identify, understand and respond appropriately to signs of possible abuse and neglect including (this list is not exhaustive, see below):

- Significant changes in children's behaviour
- Deterioration in children's general well-being
- Unexplained bruising, marks or signs of possible abuse or neglect
- Children's comments which give cause for concern
- Any reason to suspect neglect or abuse outside the setting, for example in the child's home
- Inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

2.8. Mobile phones should not be used at any time whilst caring for the children, except for emergencies only

### 3. Principles

3.1. This organisation takes seriously its responsibility to safeguard and promote the welfare of the children and young people in its care. It is committed to creating a culture of vigilance.

3.2. An agreed definition of safeguarding is: 'All agencies take all reasonable measures to ensure that the risks of harm to children's welfare are minimised. Where there are concerns, all agencies take action to address those concerns, working to agreed local policies and procedures in full partnership with other local agencies' - Joint Chief Inspectors' report 2002.

3.3. Safeguarding encompasses many aspects of this project's activities, wherever a child's welfare might be compromised; child protection is one very important aspect of safeguarding.

3.4. Promoting welfare involves 'creating opportunities to enable children to have optimum life chances in adulthood' – '**Framework for the Assessment of Children in Need and their Families (Government guidance 2000)**'



**3.5.** The Governing Body will act in accordance with ‘**Section 175 of the Education Act 2011**’ to safeguard and promote the welfare of our girls at this organisation.

**3.6.** All children have the right to be safeguarded from harm or exploitation whatever their:

- Race, religion, first language or ethnicity
- Gender or sexuality
- Age
- Health or disability
- Political or immigration status

**3.7.** Staff, volunteers and governors in this organisation are committed to fostering an ethos which:

- Encourages and supports parents/carers and works in partnership with them;
- Listens to and values the girls;
- Ensures all staff and volunteers are aware of signs and symptoms of abuse, know the correct procedure for referring concerns or allegations and receive appropriate training to enable them to carry out these requirements;
- Maintains a safe environment for all girls;
- Exercises their duty to work in partnership with other agencies and to share information with them in accordance with legislation (Children Act 2004)

**3.8.** We recognise that staff and volunteers, because of their contact with and knowledge of the children or young people in their care, are well placed to identify abuse and offer support.

**3.9.** Our recruitment and selection procedure includes checks on staff suitability to have contact with the children (including Criminal Records Bureau enhanced checks) as recommended by the (EYFS) &LA. The same recruitment procedure is to be adopted for individuals who volunteer on a regular basis.

**3.10.** Statements about or allegations of abuse or neglect made by children will always be taken seriously and acted upon promptly.

**3.11.** This organisation recognises it is an agent of referral and not of investigation; no action will be taken knowingly which might undermine a criminal investigation. Investigating agencies are Children’s Services, Social Care and the Police.

**3.12.**

## **4. Designated Safeguarding Lead**

**4.1.** The Organisation has appointed a member of Staff with the necessary status and authority to be responsible for matters relating to child protection and welfare.

**4.2.** The Designated Safeguarding Lead shall be given the time, funding, training, resources and support to enable her to support other Staff on safeguarding matters, to contribute to strategy discussions and / or inter-agency meetings and to contribute to the assessment of children.

**4.3.** Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the organisation. If preferred, parents may discuss concerns in private with the child's leader who will notify the Designated Safeguarding Lead in accordance with these procedures.

**4.4.** Recognising that Staff build expertise by undertaking safeguarding training, the Designated Safeguarding Lead shall ensure that all Staff are trained regularly, and on arrival at the organisation, so that everyone is capable of identifying children who may benefit from early help, and providing appropriate support when a problem emerges at any point of in a child's life at the organisation.

**4.5.** The Designated Safeguarding Lead will liaise with the SENCO to ensure that vulnerable children are identified and additional measures are put into place, and barriers are identified and overcome.

**4.6.** If the Designated Safeguarding Lead is unavailable, her duties will be carried out by one of the Nominated Designated Safeguarding Deputies.

## **5. Duties of Staff, Governors and Volunteers**

**5.1.** All Staff, Governors and Volunteers of the establishment are under a general legal duty:

- To protect children from abuse.
- To be aware of the terms and procedures in this Policy and to follow them.
- To know how to access and implement the procedures in this Policy, independently if necessary.
- To keep a sufficient record of any significant complaint, conversation or event in accordance with this Policy.
- To report any matters of concern in accordance with this Policy.

**5.2.** Staff are under a duty to inform the organisation if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006 as amended 2018.

**5.3.** The Trustees ensures:

5.3.1 That the organisation has identified a Designated Safeguarding Lead for child protection, and deputy/ies.

5.3.2 That the Board of Trustees has nominated one of its members to take leadership of the organisations safeguarding arrangements on behalf of the Board and s/he will

liaise with external agencies where this is required, including in the event of allegations of abuse made against a member of the Managing Body.

- 5.3.3 That the establishments safeguarding arrangements take into account the procedures and practice of the Local Authority Safeguarding Children Board in Hackney and Haringey.
- 5.3.4 In liaison with the Designated Safeguarding Lead, the nominated Governor for Safeguarding will ensure that the organisation has an effective Child Protection Policy and clear procedures in place, and that these are known to all members of staff (including supply staff) and volunteers.
- 5.3.5 That the Trustees receive regular reports on changes to the Child Protection Policy or procedures; the training undertaken by the Designated Safeguarding Lead, other staff, volunteers and Trustees; the number of child protection incidents/cases (without detail or name); and how safeguarding issues are addressed through the curriculum.
- 5.3.6 That they review and up-date (as appropriate) the Organisation's Child Protection Policy on an annual basis.
- 5.3.7 That the Board will take action, as per the usual agreed procedures, where there are allegations against the Management Body.

## **6. Procedures for Referral/ Principles for Interventions to Protect Children**

**6.1.** Every complaint or suspicion of abuse will be taken seriously and action taken in line with this policy and the following guidance:

- Working Together to Safeguard Children - A Guide to Inter-Agency working to Safeguard and Promote the Welfare of Children July 18.
- What to do if you're worried a child is being abused – Government Guidance – March 2015.

**6.2.** Any member of staff, volunteer or visitor to this Organisation who receives a disclosure of abuse or suspects that abuse may have occurred must report it immediately to the Designated Safeguarding Lead or her deputy, concerns should be shared in writing. The names of the Nominated Safeguarding Lead and Deputies are clearly displayed in each department's office. If a member of staff suspects or hears a complaint of abuse, the procedures set out in appendix 4 must be followed and verbal conversations should be promptly recorded in writing.

It is not the responsibility of the staff to investigate or determine the truth of any disclosure or allegation of abuse. All staff, however, have a duty to recognise concerns and maintain an open mind and ensure they take action in accordance with this policy.

**6.3.** If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the Staff member with concerns should press for re-consideration.

6.3.1 From October 2015, Leaders must report to the police cases where they discover that an act of female genital mutilation appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with the Designated Safeguarding Lead and involve children's social care as appropriate

6.3.2 Normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism.

#### **6.4. Action by the Designated Safeguarding Lead**

6.4.1 On being notified of a complaint or suspicion of abuse, the action to be taken by the Designated Safeguarding Lead will take into account:

- (a) The local inter-agency procedures of the Hackney or Haringey Safeguarding Children Board.
- (b) Where relevant, local information sharing protocols relating to Channel referrals.
- (c) The nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence, including the identification of someone who may already be engaged in illegal terrorist-related activity, will always be referred to children's social care and, if appropriate, the police.
- (d) The child's wishes or feelings.
- (e) Duties of confidentiality, so far as applicable.

6.4.2 If there is room for doubt as to whether a referral should be made, the Designated Safeguarding Lead will consult children's social care on a "no names" basis without identifying the family. However, as soon as sufficient concern exists that a child might be at risk of significant harm, a referral to children's social care will be made without delay (and in any event within 24 hours).

6.4.3 If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to children's social care within 24 hours. If no response or acknowledgement is received within three working days, the Designated Safeguarding Lead will contact children's social care again immediately.

6.4.4 In circumstances where a child has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the Designated Safeguarding Lead will liaise with children's social care and where appropriate an inter-agency assessment will take place, including use of the Common Assessment Framework and Team around the Child approaches, as necessary. Support within the Organisation will be provided through the establishment's pastoral structure. Decisions to seek such support for a child will be taken in consultation with parents unless there are reasonable grounds for suspecting that in doing so, the child will be at risk of significant harm.

6.4.5 Where relevant, the organisation will cooperate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The organisation will respond to requests from the police promptly and in any event within five to ten working days.

6.4.6 All information and action taken, including reasons for any decision made, will be fully documented. All referrals to children's social care will be accompanied by a standard referral form.

**6.5.** The Designated Safeguarding Lead will assist the investigating agencies to make enquiries into concerns of child welfare. This will include ensuring this Organisation is represented at Child Protection Conferences and that information about the child is provided as required.

**6.6.** The Designated Safeguarding Lead will be responsible for co-ordinating action and liaising with other agencies and support services over child protection and other safeguarding issues.

**6.7.** Confidentiality must be maintained and information relating to individual child/family shared with staff on a strictly need to know basis. Any information is shared under the guidance of the Area Child Protection Committee.

**6.8.** We understand that concerns about significant harm may arise about children who already have an allocated social worker and we will pass on such concerns without delay.

**6.9.** Every member of staff has an individual responsibility for child protection. Where there is concern about a child's welfare and the designated senior person is not available, or it is felt that he is not taking the concerns seriously, another person in the Organisation management team should refer to the Children's Services Social Care local office.

**6.10.** Staff must report to the police cases where they discover that an act of female genital mutilation appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with Designated Safeguarding Lead and involve children's social care as appropriate.

**6.11.** “Where relevant, the Organisation will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The Organisation will respond to requests for information from the police promptly and in any event within five to ten working days. “

## **7. Dealing with Allegations against Governors, Staff and Volunteers**

**7.1.** Local procedures plus the Government guidance ‘Working Together to Safeguard Children’, and DfE Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges September 2019, Part 4: Allegations of Abuse made against Staff.

**7.1.1** The Organisation has procedures for dealing with allegations against Trustees Staff and Volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect Staff and Volunteers from false or unfounded allegations. These procedures are set out in Dealing with allegations against members of staff Policy including the Designated Safeguarding Lead, Trustees or Volunteers and follow Part 4 of Keeping children safe in education 2019.

**7.1.2** The Local Authority has designated a particular officer to be involved in the management and oversight of allegations against people that work with children (designated officer). The designated officer will be informed immediately and in any event within one working day of all allegations against Trustees, Staff and volunteers that come to the Organisations attention and appear to meet the criteria set out in the whistleblowing policy including the Designated Safeguarding Lead, the Trustees or Volunteers.

**7.2.** All concerns/allegations about adults who work in our Organisation will be taken seriously and will be dealt with by the Designated Safeguarding Lead. She will contact the Officer for Child Protection (who is the LA Designated Officer (LADO) for Schools) for consultation.

The LADO will record the consultation and will advise on the appropriate action that needs to be taken, which could include a referral to investigating agencies. (If the LADO is not available, there should be no delay in taking advice or referring to Children’s Services Social Care.)

Due recognition will be paid to the stress caused by such an allegation and appropriate skills deployed to balance the needs of the child and support for the member of staff. However, the needs of the child must take precedence (Children Act 1989, Section 1 (1) (b)).

A decision will be taken as to whether the adult should be suspended without prejudice / removed to other duties / work under supervision during the course of the investigation.

**7.3.** Where the allegation is against any of the Designated Safeguarding Deputies, The Trustees will take responsibility for dealing with the issue; where concerns are about the

Board of Trustees, these should be taken directly to the Local Authority Designated Officer (LADO)

**7.4.** In order to minimise the risk of harm to children and of accusations being made against staff as a result of their daily contact with children, the Trustees aim to ensure, through the Designated Safeguarding Deputies, that all staff are aware of safe working practice and follow guidelines on the use of control and physical restraint.

**7.5.** Where a member of staff or a volunteer is either dismissed from the organisation, resigns, or is found to be unsuitable, or internally disciplined because of misconduct relating to a beneficiary, the Department of Health administrators should be notified so that the name may be included on the List 99 for the Protection of Children and Vulnerable Adults. A referral to the ISA (Independent Safeguarding authority) will be made within one month of the person leaving the Organisation – a referral form and guidance is available on their website: <http://www.isa.homeoffice.gov.uk/>

Staff and Volunteers should also feel able to follow the Organisation's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the establishment, potential failures by the Organisation or its Staff to safeguard properly the welfare of the girls or other wrongdoing in the workplace that does not involve the safeguarding and welfare of children.

## **8. Allegations against other beneficiaries- Peer on Peer abuse**

**8.1.** Allegations against girl should be reported in accordance with the procedures set out in this Policy. The organisation will continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to young people, with full consideration to the impact on the emotional, mental health and well-being of all young people involved. Ultimately the system and processes that the establishment operates are designed with the best interests of the Child at their heart.

**8.2.** The Organisation will take advice from children's social care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all girls involved including the ones accused of abuse.

**8.3.** If it is necessary for a child to be interviewed by the police in relation to allegations of abuse, the Organisation will ensure that, subject to the advice of children's social care, the girl's parents are informed as soon as possible and that the girl is supported during the interview by an appropriate adult.

**8.4.** Where an allegation is made against a beneficiary, both the victim and the alleged perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed.

## **9. Supporting Children**

- 9.1.** We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame herself or find it difficult to develop and maintain a sense of self-worth.
- 9.2.** Where a child shows signs and symptoms of ‘faltering growth’ or neglect, we make appropriate referrals. In extreme cases we will inform local social services or on-call duty social worker.
- 9.3.** When a girl may present with one of the protected characteristics staff are here to support them. This is referred to the DSL and dealt with according to the Organisation’s referral procedures.
- Actual support for the child can be internal or external to the organisation, depending on the support needed.
- Where a child with one of the protected characteristics is identified or comes forward, that child is not at risk and is properly looked after.

- 9.4.** We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 9.5.** Our establishment will support all its children by:
- Encouraging the development of self-esteem and resilience in every aspect of the organisations activities whilst not condoning aggression or bullying
  - Promoting a caring, safe and positive environment
  - Liaising and working together with all other agencies
  - Ensuring there is a named member of staff for ‘Looked After’ children

## **10. Record Keeping**

- 10.1.** We follow all the disclosure and recording procedures when investigating an allegation that a member of staff or volunteer has abused a child as if it were an allegation of abuse by any other person.
- 10.2.** We investigate claims or suspicions with sensitivity. Staff in the Organisation takes care not to influence the outcome either through the way they speak to children or ask questions of children.
- 10.3.** Where a child makes a disclosure to a member of staff, that member of staff:
- Offers reassurance to the child;
  - Listens to the child; and



- Gives reassurance that she will take action.
  - The member of staff does not question the child.
- 10.4.** Any member of staff or volunteer receiving a disclosure of abuse, or noticing possible abuse, must make an accurate record as soon as possible, noting what was seen or said (recording the child's own words as far as possible) putting the event into context, and giving the date, time and location. Information should be recorded in non-judgmental, non-emotive terms.
- 10.5.** Staff makes a record of:
- The child's name;
  - The child's address;
  - The age of the child;
  - The date and time of the observation or the disclosure;
  - An objective record of the observation or disclosure;
  - The exact words spoken by the child;
  - The name of the person to whom the concern was reported, with date and time; and
  - The names of any other person present at the time.
  - All records must be dated and signed.
- 10.6.** All hand-written records will be retained, even if they are subsequently typed up in a more formal report.
- 10.6.1 The Organisation will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The Organisation will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under s.47 of the Children Act 1989 in accordance with the requirements of *Working together to safeguard children (July 2018)*, the *Prevent Duty Guidance for England and Wales (2015)*, and *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015)*.
- 10.6.2 Where allegations have been made against Staff, the Organisation will consult with the designated officer and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.
- 10.7.** All records relating to child protection concerns will be kept in a secure place and will remain confidential. They do not form part of the child's educational records and are not required to be disclosed to parents/carers. Any requests from parents'/carers' solicitors to have records disclosed to them should be passed to one of the county solicitors for advice.
- 10.8.** Files relating to concerns about girls will include a chronology of incidents and subsequent actions/outcomes.

## **11. Children with Special Educational Needs**

**11.1** There are additional barriers that can exist when recognising abuse and neglect in children with disabilities. Refreshing Minds recognise that children with SEN and/ or disabilities.

- Are more prone to peer group isolation and other children
- Are being disproportionately impacted by behaviours such as bullying, without outwardly showing signs.
- Have communication barriers and difficulties in overcoming these barriers  
(KCSIE 2019)

**11.2** Refreshing minds will therefore:

- Provide extra pastoral support for children (by the SENCO)
- Have careful consideration for disciplinary measures such as restraints or isolation in response to incidents involving these children.
- Create individual plans for children with SEND who may present with challenging behaviours.

(See DfE use of reasonable force July 2013)

**11.3** The Organisation recognises that children with special educational needs may be especially vulnerable to abuse and expect staff to take extra care to interpret correctly apparent signs of abuse or neglect.

**11.4** Staff responsible for any intimate care of children will undertake their duties in a professional manner at all times and ensure the child's dignity is preserved with a high level of privacy, choice and control. There will be close partnership with parents/carers.

## **12. Parental Involvement**

**12.1** This Organisation is committed to helping parents/carers understand its responsibility for the welfare of all girls.

**12.2** Parents/carers will be made aware of the Organisation's Child Protection and Safeguarding Policy via the Organisation prospectus and copies available to parents.

**12.3** As previously stated, where possible, concerns about children will be discussed with parents/carers in the first instance and the designated senior person should advise of the need to make referrals to the LADO local office, unless to do so would place the girl at increased risk of significant harm.

**12.4** The Organisation has at least two emergency contacts for every child.

## **13. Training**

**13.1** The Organisation committee recognises the importance of up to date child protection training for the Designated Safeguarding Lead and for all other staff and volunteers in the Organisation.

**13.2** The Designated Safeguarding Lead attends training events organised by Hackney LA or the Local Safeguarding Children Board. The Designated Safeguarding Lead and Designated Safeguarding Deputies will have inter-agency training and receive 'refresher' training every two years. The head Leader and DSL also have training in Safer Recruitment.

**13.3** Child protection is a vital part of induction training for all new staff and volunteers, including all those who join during the year. Staff who do not have lead responsibility for child protection will receive 'refresher' training every three years.

**13.4** Prevent duty training will be consistent with Home Office WRAP (Workshop to Raise Awareness of Prevent) training.

**13.5 Induction:**

All Staff, including temporary Staff and Volunteers, will be provided with induction training that includes:

- This Policy
- The Code of Conduct – Staff Behaviour Policy, including the Whistleblowing Procedure.
- The role of the Designated Safeguarding Lead and her identity and contact details, together with that of her Deputies.
- Child Protection training in accordance with the Hackney and Haringey Local Authority Safeguarding Children Board procedures.
- A copy of the **Keeping Children Safe in Education 2019**.
- The online general awareness training module on Channel.

**13.6. Child Protection Training**

(a) All Staff will receive a copy of this Policy and Part 1 of *Keeping Children Safe in Education 2019*, and will be required to confirm that they have read and have understood how in practice, to discharge their role and responsibility as set out in this document.

(a) All Staff members will undertake appropriate child protection training which will be updated every two years and following consultation with the Hackney and Haringey Safeguarding Children Board.

(b) Staff development training will also include training on online safety and how children manage devices, and where they have not been able to access other Prevent training assessed as appropriate for them by

the Organisation, the online general awareness training module on Channel.

- (c) Additionally, the Organisation will make an assessment of the appropriate level and focus for Staff training and responsiveness to specific safeguarding concerns such as radicalisation, cyberbullying and mental health.
- (d) The nominated Governor for Child Protection will receive appropriate training to enable her to fulfil her safeguarding responsibilities. All training will be carried out in accordance with the Hackney & Haringey Safeguarding Children Board procedures.

## **14 Prevent Duty**

**14.1** The Prevent duty is the duty in the Counter-Terrorism and Security Act 2015 to prevent people from being drawn into terrorism.

**14.2** In order for Refreshing Minds to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation is seen as part of the Organisations wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

**14.3** The Organisation will also build beneficiaries' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The Prevent duty does not intended to stop children debating controversial issues. On the contrary, the Organisation will provide a safe space in which the children and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

### **14.4 Risk Assessments**

*14.4.1* The Organisation is expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.

*14.4.2* It is important that the Organisation understands these risks so that it can respond in an appropriate and proportionate way. There is no single way of identifying an individual who is likely to be susceptible to terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. Staff should

use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

**14.4.3** Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. The Prevent duty does not require Leaders or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

**14.4.4** General safeguarding principles apply to keeping children safe from the risk of radicalisation as set out in our safeguarding policy.

**14.4.5** Staff and childcare providers should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

An [online general awareness training module on Channel is available](#). The module is suitable for staff and other front-line workers. It provides an introduction to the topics covered by this advice, including how to identify factors that can make people vulnerable to radicalisation.

## **14.5 Working in partnership**

Local authorities are vital to all aspects of Prevent work. The police and also civil society organisations, may be able to provide advice and support to Organisation on implementing the duty. Effective engagement with parents / the family is also important as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms.

## **14.6 IT Policies**

The statutory guidance makes clear the need for Organisation to ensure that children are safe from terrorist and extremist material when accessing the internet in Organisation. Organisations should ensure that suitable filtering is in place.

Our Organisation policy is not to have any internet access for children. This effectively will prevent our children from any IT contact with radical views.

## **14.7 Building children's resilience to radicalisation:**

- The Organisation will build girls' resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. The Organisation promotes

the spiritual, moral, social and cultural development of children and, within this, fundamental British values.

- This subject is used to teach children to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. It also develops effective ways of resisting pressures, including knowing - when, where and how to get help.

## **15. Role of Trustee Board**

- 15.1** Trustees will ensure that the Organisation has a Designated Safeguarding Lead in place and will nominate a governor with responsibility for safeguarding.

The nominated governor for safeguarding, in liaison with the Designated Safeguarding Lead, will ensure that the Organisation has an effective Safeguarding Policy and clear procedures in place, and that these are known to all members of staff and volunteers.

- 15.2** Newly appointed staff are required to read copies of the policy and procedures as part of their induction training, and to verify that they understand the contents by signing a specific form.

The Trustees will receive a written annual report on changes to the child protection policy or procedures; and more regularly of any interim changes at termly governors' meetings. They will also receive an annual audit report from the Designated Safeguarding Lead indicating the training she has undertaken, the training undertaken by other staff, volunteers and governors; the number of child protection incidents/cases (without detail or name); and how safeguarding issues are addressed.

- 15.3** The Trustees will review the updated Safeguarding Policy on an annual basis.

- 15.4** As previously stated, the Board of Trustees will take action, according to agreed procedures, where there are allegations against the Designated Safeguarding Lead.

## **16. Whistle Blowing**

- 16.1** We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

- 16.2** All staff and volunteers should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the actions of colleagues.

## **17. Extended Hours and Before and After the Organisations Activities**

**19.1** Where the Trustee body provides services or activities directly under the supervision or management of the Organisations staff, the establishment's arrangements for child protection will apply.

## **18. Security**

**18.1** The Organisation will take all practicable steps to ensure that Organisation premises are as secure as circumstances permit.

**18.2** We take security steps to ensure that we have control over who comes into the Organisation so that no unauthorised person has unsupervised access to the children.

**18.3** The Organisation's policy on the use of mobile phones and cameras in the Organisation, including the EYFS setting, is as follows:

*18.3.1* The Organisation's Policy on E-Safety sets out the expectations on girls in relation to the use of mobile phones and cameras in Organisation. Mobile phones are not to be used on Organisation premises (including at break times).

*18.3.2* Staff and Volunteers should use mobile phones and cameras in accordance with the guidance set out in the Code of Conduct – Staff Behaviour Policy. They may not use mobile phones to photograph or record events taking place in the establishment or of girls.

*18.3.3* Parents may bring mobile phones on to the premises, but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

## **19. Monitoring and Review**

**19.1** The Designated Safeguarding Lead will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Trustees as necessary. The Designated Safeguarding Lead will update the Senior Leadership Team regularly on the operation of the Organisations safeguarding arrangements.

**19.2** Any child protection incidents at the establishment will be followed by a review of these procedures by the Designated Safeguarding Lead and a report made to the Trustees Body. Where an incident involves a member of Staff, the designated officer will assist in this review to determine whether any improvements can be made to the Organisations procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

19.3 The full Trustee Body will undertake an annual review of this Policy and the organisations safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation, and the effectiveness of inter-agency working. The Designated Safeguarding Lead will work to prepare a written report commissioned by the full Trustee Body. The written report should address how Refreshing Minds ensures that this Policy is kept up to date; Staff training on safeguarding; referral information; issues and themes which may have emerged in the Organisation and how these have been handled; and the contribution the is making to multi-agency working in individual cases or local discussions on safeguarding matters.

19.4 The full Board of Trustees should also consider independent corroboration, such as inspection of records or feedback from external agencies including the local authority designated officer. The full Body will review the report, this Policy and the implementation of its procedures, and consider the proposed amendments to the Policy before giving the revised Policy its final approval.

19.5 **Detailed minutes recording the review(s) by the Governing Body will be made**

## **Appendix 1: The Designated Safeguarding Lead**

<b>Post title:</b>	Designated Senior Lead (DSL)
<b>Reporting to:</b>	Trustees
<b>Responsible for:</b>	Safeguarding children in education
<b>Liaising with:</b>	Head Leader, SENCO, Children’s Social Care, Parents/Carers

### **1. MAIN PURPOSE OF JOB**

In accordance with **Annex B of *Keeping children safe in Education 2019***, the main responsibilities of the Designated Safeguarding Lead (DSL) are:

#### **1.1 To identify signs of abuse.**

#### **1.2 Managing Referrals**

1.2.1 To take lead responsibility for referring all cases of suspected abuse of any beneficiary to children’s social care and:

- (a) The designated officer for all child protection concerns which involve a member of Staff or Volunteer.



- (b) the Disclosure and Barring Service (DBS) where a member of Staff is dismissed or has left due to risk / harm to a child; and / or the police where a crime may have been committed.

1.2.2 Liaising with the Trustees to inform her of issues especially ongoing enquiries under **section 47 of the Children Act 1989** and police investigations.

1.2.3. To act as a source of support, advice and expertise to staff on matters of safety and safeguarding, and when deciding whether to make a referral by liaising with relevant Agencies

1.3 Maintain detailed and accurate written records of child protection concerns and ensure they are kept securely.

## 2. Raising Awareness

2.1 Ensure that all staff have a copy of, and understand, the Organisations Child Protection and Safeguarding Policy and Procedures.

2.2 Ensure that Child Protection training is part of the induction for all new staff and that they are linked into any relevant training.

2.3 Be responsible for the annual review, implementation and update of the establishments Safeguarding Policy and the presentation of this to the Trustee Body.

2.4 Ensure that a copy of the Organisations Child Protection and Safeguarding Policy and Procedures is available publicly and for any parent who requests to see it.

2.5 Ensure that the Head Leader is updated on a regular basis about all issues and child protection investigations.

2.6 Be part of the team who review and monitor any causes of concern relating to girls which are raised in the Organisation.

2.7 Ensure that parents are made aware that referrals about suspected abuse or neglect may be made to children's social care and the Organisation's role in this.

2.8 Maintain links with Hackney's Safeguarding Children Board to ensure staff are aware of training opportunities and the local policies on safeguarding.

2.9 In accordance with the **Prevent Duty Guidance for England and Wales** and **Channel Duty Guidance: Protecting vulnerable people from being drawn**

*into terrorism (2015)*, the Designated Safeguarding Lead has, in addition, the following responsibilities:

- (a) Acting as the first point of contact for parents, children, Staff and external agencies in all matters related to the Prevent duty;
- (b) Co-ordinating Prevent duty procedures within the Organisation;
- (c) Liaising with local Prevent co-ordinators, the police and Local Authorities, and through existing multi-agency forums, including referrals to the Channel Police Practitioner where indicated;
- (d) Undergoing WRAP or other appropriate training;
- (e) Maintaining ongoing training programme for all the Organisations employees including induction training for all new employees, and keeping records of staff training;
- (f) Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

### **3. MAIN DUTIES**

- 3.1** Provide support, advice and guidance to colleagues.
- 3.2** Recognise signs/indicators of abuse and decide when referrals to Children's Social Care/other relevant agencies are appropriate.
- 3.3** Refer all cases of allegations against adults (or suspected cases) to the Designated Officer or team of officers in the local Authority.
- 3.4** Liaise with the Trustees to inform them of any issues or on-going investigations.
- 3.5** Ensure that there is always cover for the DSL role by having a named deputy.
- 3.6** Liaise with relevant agencies (where appropriate) to inform the decision on whether to make a referral to Children's Social Care.
- 3.7** Keep detailed, accurate and secure written records of referrals and concerns. Ensure these records are stored in a locked filing cabinet and are not accessible by staff or beneficiaries.
- 3.8** Ensure the organisation's child protection and safeguarding related policies are up to date and reviewed annually. Work with the Governing body / named Governor regarding this.

- 3.9 Ensure every member of staff has access to and understands the Organisations child protection and safeguarding related policies (including whistle blowing etc.).
- 3.10 Ensure that parents have access to and have seen the Child Protection policy which alerts them to the fact that referrals may be made and the role the establishment has in this to avoid possible future conflict.
- 3.11 Ensure all staff have induction training which covers child protection / safeguarding and are able to recognise and report any concerns immediately when they arise.
- 3.12 Ensure that all staff have refresher training at least once every two years and that all new staff receive this training during their induction to the Organisation. Keep accurate records of staff participation in this.
- 3.13 The Designated Safeguarding Lead, has undertaken child protection training and training in inter-agency working, and will attend recorded refresher training at **two-yearly intervals** in order to:
  - 3.13.1 understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
  - 3.13.2 have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
  - 3.13.3 Ensure each member of staff has a copy of, and understands, the Organisations Child Protection and Safeguarding Policy and Procedures.
  - 3.13.4 be alert to the specific needs of children in need, those with special educational needs and young carers;
  - 3.13.5 be able to keep detailed, accurate, secure written records of concerns and referrals;
  - 3.13.6 obtain access to resources and attend any relevant or refresher training courses;
  - 3.13.7 Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Organisation may put in place to protect them and to meet the requirements and procedures of the Local Authority's Safeguarding Children Board.

#### 4. SKILLS

- a. Excellent relationships with children, parents and Staff (including being open and approachable).
- b. Excellent communication skills.
- c. High level of sensitivity.
- d. Maintain confidentiality as appropriate and required.
- e. Maintain accurate and detailed records.
- f. Analyse information and determine the appropriate course of action.
- g. Able to deal with emotionally stressful matters.
- h. Able to contribute effectively to planning / review / strategy meetings.

## **Appendix 2 : Types Of Abuse and Neglect**

Types of abuse and neglect:

1. **Abuse is** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.
2. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

### 3.1 POSSIBLE SIGNS AND INDICATORS OF PHYSICAL ABUSE

- Unexplained injuries or burns, particularly if recurrent
- Refusal to discuss injuries or improbable explanations
- Untreated injuries or lingering illness
- Admission of punishment which appears excessive
- Shrinking from physical contact
- Fear of returning home or of parents being contacted
- Fear of undressing
- Fear of medical help
- Aggression/bullying
- Over compliant behaviour or 'watchful attitude'
- Running away
- Significant changes in behaviour without explanation

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

#### 4.1 POSSIBLE SIGNS AND INDICATORS OF EMOTIONAL ABUSE

- Continual self-deprecation
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Self-harm or mutilation
- Compulsive stealing/scrounging
- Drug/solvent abuse
- 'Neurotic' behaviour – obsessive rocking, thumb-sucking, and so on
- Air of detachment – 'don't care' attitude
- Social isolation – does not join in and has few friends

5. **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 can also commit acts of sexual abuse, as can other children.

#### 5.1 POSSIBLE SIGNS AND INDICATORS OF SEXUAL ABUSE

- Bruises, scratches, burns or bite marks on the body
- Scratches, abrasions or persistent infections in the anal or genital regions
- Sexual awareness inappropriate to the child's age – shown for example in drawings, vocabulary, games, and so on
- Frequent public masturbation

- Attempts to teach other children about sexual activity
- Refusing to stay with certain people or go to certain places
- Aggressiveness, anger, anxiety, tearfulness
- Withdrawal from friends
- Pregnancy (in older young people)

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

#### 6.1 POSSIBLE SIGNS AND INDICATORS OF NEGLECT

- Hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor social relationships
- Compulsive stealing or scrounging
- Tiredness

### 7. Female Genital Mutilation

7.1 FGM is a deeply rooted tradition, widely practised mainly among specific ethnic populations in Africa and parts of the Middle East and Asia, which serves as a complex form of social control of women's sexual and reproductive rights. It is illegal to practice FGM and the Organisation follows the guidelines set out in Multi-Agency Practice Guidelines: Female Genital Mutilation.

7.2 If you are worried about a child under 18 who is at risk of FGM or has had FGM, **you have a legal obligation to share this information with social care or the police.** It is then their responsibility to investigate, safeguard and protect any girls involved. Other professionals should not attempt to investigate cases themselves.

7.3 Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl or woman being at risk of FGM, or already having

undergone FGM. There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM – see Section 2.5 for the nationalities that traditionally practise FGM. Provided that the mutilation takes place in the UK, the nationality or residence status of the victim is irrelevant. Professionals should also note that the girls and women 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

7.4 DUTY TO SAFEGUARD CHILDREN. Safeguarding girls at risk of harm of FGM poses specific challenges because the families involved may give no other cause for concern, for example with regard to their parenting responsibilities or relationships with their children. However, there still remains a duty for all professionals to act to safeguard girls at risk – with four key issues to consider:

1. An illegal act being performed on a female, regardless of age.
2. The need to safeguard girls and young women at risk of FGM.
3. The risk to girls and young women where a relative has undergone FGM.
4. Situations where a girl may be removed from the country to undergo FGM.

7.5 SITUATIONS WHERE A GIRL MAY BE REMOVED FROM THE COUNTRY TO UNDERGO FGM . As described in Sections 2.3 and 2.4, it is unlawful to perform FGM, or to assist a girl or woman to perform FGM on herself, in England and Wales. It is an offence for UK nationals or permanent UK residents to perform FGM, or to assist a girl to perform FGM on herself, abroad. It is also an offence for a UK national or permanent resident to assist a non-UK person to perform a relevant act of FGM (as defined in section 3(2) of the Female Genital Mutilation Act 2003) abroad – this would cover taking a girl abroad to be subjected to FGM. However, there may be instances where the exact risk of this occurring is not known, but one parent – or a professional – may be concerned enough to alert professionals. In certain circumstances a Prohibitive Steps Order or Wardship Order can be used to prevent a girl being removed from the country – Chapter 5 describes legal interventions in more detail.

## **8. Child Sexual Exploitation**

8.1 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 (a) in exchange for something the victim needs or wants, and/or (b) 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 through the use of technology.

8.2 Child sexual exploitation is a complex form of abuse and it can be difficult for those working with children to identify and assess. The indicators for child sexual exploitation can sometimes be mistaken for 'normal adolescent behaviours'. It requires knowledge, skills, professional curiosity and an assessment which analyses the risk factors and personal circumstances of individual children to ensure that the signs and symptoms are interpreted correctly and appropriate support is given. Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation) consent cannot legally be given whatever the age of the child.

8.3 Any practitioner working with a child who they think may be at risk of child sexual exploitation will follow the guidance set out in Working Together and share this information with local authority children's social care. You should refer any concerns about a child's welfare to local authority children's social care. If you believe a child is in immediate risk of harm, you should contact the police.

8.4 Staff must be responsive and pro-active: everyone should be alert to the potential signs and indicators of child sexual exploitation, as well as other forms of abuse, and exercise professional curiosity in their day to day work. It is better to help children and young people as early as possible, before issues escalate and become more damaging;

## 9. What is meant by 'harm'?

9.1 S31(9) Children Act 1989, as amended by Adoption & Children Act 2002

- **'Harm'** means ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another
- **'Development'** means physical, intellectual, emotional, social or behavioural development
- **'Health'** means physical or mental health
- **'Ill-treatment'** includes sexual abuse and forms of ill-treatment which are not physical

9.2 The courts are bound by the following principles in decision-making:

- The welfare of the child is paramount
- Children should usually be brought up in their own families
- Courts shall have regard to the principle that delaying procedures is detrimental to the child's welfare
- Delays in hearing a case works against the child's welfare
- Courts should not make an order if not making an order is better for the child
- Courts should pay attention to a range of specific issues including:



- The child's wishes and feelings
- Ability of parents/carers to meet the needs of the child
- Likely effects of changing the child's circumstances

### 9.3 Recording

#### ○ Record the evidence:

- What you have seen
- What the child said, using the child's words, not your interpretation
- What you said
- Note the context, time and date on your record and sign it
- Then say how you interpret all the above and what your concerns are about this information – it is OK to make hypotheses as long as you are clear that you are doing so

#### ○ Use plain language and type up your recording

#### ○ Do not confuse judgements with the facts

#### ○ Remember that service users can access their records at any time

#### ○ Give evidence for opinions

#### ○ Be precise

#### ○ Seek advice as to what to do next from your Nominated Safeguarding Children Adviser

### **Appendix 3: Guidance for Staff and Volunteers on suspecting or hearing a complaint of abuse, and action to be taken**

1. Disclosures or information may be received from children, parents or other members of the public. The Organisation recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly all Staff will handle disclosures with sensitivity and follow the guidance in this Policy.
2. Staff should be aware of the distinction between children in need and children at risk of harm, and respond appropriately.
3. **Action Staff must take**
  - 3.1 A member of Staff or Volunteer suspecting or hearing a complaint of abuse:
    - 3.1.1 Must listen carefully to the child and keep an open mind. The member of Staff should not take a decision as to whether or not the abuse has taken place;

- 3.1.2 Must not ask leading questions, i.e. a question that suggests its own answer;
- 3.1.3 Must reassure the child but not give a guarantee of absolute confidentiality. The member of Staff should explain that they need to pass on the information in accordance with this Policy so that the correct action can be taken; and
- 3.1.4 Must keep a sufficient written record of the conversation made as soon as possible after the end of the discussion with the child. The record should include:
  - (a) the date and time;
  - (b) the place of the conversation; and
  - (c) the essence of what was said and done by whom and in whose presence;and must be signed by the person making it, using names and not initials.
- 3.2 The written record and all evidence, for example scribbled notes, mobile phones containing text messages, clothing and computers, must be kept securely and passed on when reporting the matter in accordance with paragraph 3.3 below.
- 3.3 All suspicions or complaints of abuse must be reported to the Designated Safeguarding Lead as soon as possible, unless it is an allegation against a member of Staff in which case the procedures set out in Dealing with allegations against members of Staff Policy including the Designated Safeguarding Lead, the Head Leader, Trustees or Volunteers should be followed.
- 3.4 **If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children’s social care immediately. Anybody can make a referral. If the child’s situation does not appear to be improving the Staff member with concerns should press for re-consideration.**

## **Appendix 4 Peer on Peer Abuse Policy and Procedures**

### **1 Introduction**

**1.1 Keeping Children Safe in Education 2019** makes it the responsibility of *governing bodies and proprietors to ensure that their child protection policy includes procedures to minimise*

*the risk of peer on peer abuse and sets out how allegations of peer on peer abuse will be investigated and dealt with. The document also stresses that governing bodies, proprietors and school or college leaders should ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, any system and processes should operate with the best interests of the child at their heart.*

- 1.2 At Refreshing Minds we continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to the impact on that individual child's emotional and mental health and well-being.

## **2 Purpose and Aim**

- 2.1 Children and young people may be harmful to one another in a number of ways which would be classified as peer on peer abuse. The purpose of this Appendix is to explore the many forms of peer on peer abuse and include a planned and supportive response to the issues.

## **3 Framework and Legislation**

The relevant legislation on which this Policy Appendix is based is as follows:

- 3.1 **Children's Act 1989** which states that the child's welfare is paramount.
- 3.2 **Working Together to Safeguard Children 2018** which states that every assessment of a child, *'must be informed by the views of the child'* and *'It is important to understand the resilience of the individual child when planning appropriate services.*
- 3.3 **Keeping Children Safe in Education, 2019.**

## **4 Introduction to abuse and harmful behaviour**

Abusive behaviour can happen to children in the Organisations setting and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm. Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. It is important to consider the forms abuse may take and the subsequent actions required.

## **5 Types of Peer on Peer abuse**

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described below and followed by advice and support on actions to be taken:

### **5.1 Physical abuse, e.g. biting, hitting, kicking, hair pulling etc**

Physical abuse may include hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally, before considering the action or punishment to be taken.

**5.2 Sexually harmful behaviour / sexual abuse e.g. inappropriate sexual language, touching, sexual assault etc** sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language and inappropriate role play, to sexually touching another or sexual assault / abuse.

### **5.3 Bullying e.g. physical, name calling, homophobic etc**

5.3.1 Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious, lasting problems.

5.3.2 In order to be considered bullying, the behaviour must be aggressive and include:

- An imbalance of power: young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- Repetition: bullying behaviours happen more than once or have the potential to happen more than once.

5.3.3 Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, as well as excluding someone from a group on purpose.

## 5.4 Cyber bullying

- 5.4.1 Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites, such as Facebook and Twitter, to harass threaten or intimidate someone for the same reasons as stated above.
- 5.4.2 Restricted access to the internet, smart phones etc., greatly reduces the risk of cyber bullying and sexting by or to our girls, however the Organisation is aware of the risks, warning signs and its legal obligations and is actively vigilant to ensure that this form of peer on peer abuse is not taking place.
- 5.4.3 We are aware that there will be some girls who do manage to access unfiltered internet and therefore may have access to cyber bullying or sexting. Our antennae are very carefully attuned to the children who will be accessing such material and this is being dealt with as detailed in this policy below.

## 5.5 Prejudiced Behaviour

- 5.5.1 The term **prejudice-related bullying** refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

## 6 Action expected to be taken by all Staff

- a. Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm:
  - i. It is important to deal with a situation of peer abuse immediately and sensitively.
  - ii. It is necessary to gather the information and to get the true facts about what has occurred as soon after the event as possible as the child(ren) may have forgotten.
  - iii. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled.

- 6.1.3 In all cases of peer on peer abuse it is necessary that all Staff dealing with such incidents, talking to young people, and taking immediate action, do provide support in a calm and consistent manner.
- 6.1.4 Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.
- 6.1.3 Staff should involve the DSL at all stages and for all allegations even for seemingly minor incidences.
- 6.1.4 UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017) should be referred to in any incidences of sexting.

## 6.2 Gather the Facts:

6.2.1 This can be done by Staff member, anti-bullying officer, DSL.

6.2.2 Speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person in order to gain clarity with open questions, where; when; why; who; what happened; who observed the incident? What was seen? What was heard? Did anyone intervene? Consider the Intent (begin to Risk Assess): has this been a deliberate or contrived situation for a young person to be able to harm another?

6.2.3 Pass all information on to the DSL and together discuss next steps and to decide on a course of action.

## 6.3 Points to consider

- What are the ages of the children involved?
- How old are the young people involved in the incident and is there any age difference between those involved?
- In relation to sexual exploration, children under the age of 5, in particular 1-4 year olds who are learning toileting skills, may show a particular interest in exploration around this stage. This, however should not be overlooked if other issues arise (see following).
- Where did the incident or incidents take place?
- Was the incident in an open, visible place to others?
- If so was it observed?
- If not, is more supervision required within this particular area?
- What was the explanation by all children involved of what had occurred?

- Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved?
- Is the incident seen to be bullying for example, in which case is it regular and repetitive?
- Is the version of one young person different from another and why?
- What is each of the children's own understanding of what occurred?
- Do the young people know/understand what they are doing? For example, do they have knowledge of body parts, of privacy and that it is inappropriate to touch?
- Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour?
- Is the behaviour deliberate and contrived?
- Does the young person have understanding of the impact of their behaviour on the other person?
- In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from Children's Services Social Care or the DSL.
- Repetition - Has the behaviour been repeated with an individual on more than one occasion?
- In the same way it must be considered, has the behaviour persisted with an individual after the issue has already been discussed or dealt with and appropriately resolved?

## 7. Next Steps

- b. Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.
- c. If, from the information that you gather, you believe any young person to be at risk of significant harm you must make a safeguarding referral to social care immediately (where a crime has been committed the police should be involved also).
- d. If this is the case, once social care has been contacted, and made a decision on what will happen next, the Organisation will be informed about next steps.
- e. If social care and the police intend to pursue this further they may ask to interview the young people on the Organisations premises or they may ask for parents to come to the Organisation premises to be spoken to.
  - e. In the case that social care feel that it does not meet their criteria, the Organisation may challenge that decision.
  - f. If the Organisation agrees with the decision, the Organisation will take the next steps as detailed below.

## **8. Informing parents**

8.1 Informing parents must take place face to face.

8.2 Although this may be time consuming, the nature of the incident and the type of harm / abuse a young person may be suffering, can cause fear and anxiety to parents whether their child is the child who was harmed or who harmed another.

## **9. For the young person who has been harmed**

9.1 What support they require will depend on the individual young person.

9.2 It may be that they wish to seek counselling or one to one support via a mentor.

9.3 It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future.

9.4 If the incidents are of a bullying nature, the young person may need support in improving peer groups relationships with other young people, or some restorative justice work with all those involved may be required. An **action plan** must therefore be drawn up, detailing the support that will be given and how monitoring will be established.

9.5 Other action plan interventions that could be considered may target a whole class or year group, for example a speaker on cyber bullying, relationship abuse etc.

9.6 If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in the Organisations responsibility, so that they have someone named that they can talk to, support strategies for managing future issues, and identified services to offer additional support.

## **10. For the young person who has displayed harmful behaviour**

10.1 It is important to find out why the young person has behaved in such a way.

10.2 It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary. Particular support from identified services may be necessary through a CAF / strengthening families / early help referral and the young person may require additional support from family members, thus an **action plan** must be drawn up, detailing the consequences and support that will be given and how monitoring will be established.

10.3 Once the support required to meet the individual needs of the young person has been met, it is important that that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the



cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has been concluded. In which case, the young person will need to be provided with appropriate support and education whilst off site.

**10.4** Even following the conclusion of any investigation the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multiagency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour. The action plan may also include a punishment as a consequence such as exclusion or internal exclusion / inclusion / seclusion for a period of time to allow the young person to reflect on their behaviour.

10.5 It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative.

## **11. Preventative Strategies for the Organisation**

**11.1** For all Organisation, it is important to develop appropriate strategies in order to prevent the issue of peer on peer abuse, rather than manage the issues in a reactive way.

**11.2** Firstly, and most importantly for Organisations, is recognition that peer on peer abuse can and will occur on any site even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting young people to talk about any issues and to share information with all Staff.

**11.3** This can be supported by ensuring that each setting has an open environment where young people feel safe to share information about anything that is upsetting or worrying them.

- 11.4** To enable such an open and honest environment it is necessary to ensure all Staff members feel confident to talk about issues and challenge perceptions including the use of inappropriate language and behaviour towards one another.
- 11.5** In order to create such an environment, it is necessary for whole Staff training and CPD around abusive behaviours and talking to young people in a way that continues to create an open and honest environment without prejudice.
- 11.6** It is important that Staff do not dismiss issues as ‘banter’ or ‘growing up’ or compare them to their own experiences of childhood. It is necessary that Staff consider each issue and each individual in their own right before taking action. If Staff minimise the concerns raised it may result in a young person seeking no further help or advice. It is important that signposting is available to young people in the event that they don’t feel confident raising an issue to Staff or a peer.
- 11.7** It is useful to have a resource board with support services on a wide range of issues so that young people can seek their own solutions should they wish to.
- 11.8** In the same way external services or support programmes could be brought in to talk to young people about specific issues in support of the prevention of peer on peer abuse.
- 11.9** It is useful to ensure young people are part of changing their circumstances and that of the procedures within the Organisation. We therefore have a council and encourage young people to be part of the process and support changes and develop ‘rules of acceptable behaviour’. This goes far in helping to create a positive ethos in Organisation and one where all young people understand the boundaries of behaviour before it becomes abusive.

## **Appendix 5 Dealing with Allegations against Members of Staff including the Designated Safeguarding Lead, the Head Leader, Trustees or Volunteers**

### **1. The Organisations’ procedures**

**1.1** The organisations’ procedures for dealing with allegations made against members of Staff will be used where the member of Staff including the Designated Safeguarding Lead, the Head leaders, a Governor or volunteers has:

- 1.1.1* behaved in a way that has harmed a child, or may have harmed a child;
- 1.1.2* possibly committed a criminal offence against or related to a child; or
- 1.1.3* Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she worked regularly or closely with children.

**1.2** Any allegations not meeting this criterion will be dealt with in accordance with the Local Authority Safeguarding Children Board procedures. Advice from the designated officer will be sought in borderline cases.

**1.3** All such allegations must be dealt with as a priority without delay.

**1.4** Allegations against a Leaser who is no longer teaching and historical allegations will be referred to the police.

**1.5**

**2. Reporting an allegation against a member of Staff including the Designated Safeguarding Lead, the Head Leader, a Trustee or volunteer**

**2.1** Where an allegation or complaint is made against any member of Staff including the Designated Safeguarding Lead or a volunteer, the matter should be reported immediately to the Head Leader, or in his absence to the Nominated Governor for Child Protection. The allegation will be discussed immediately with the designated officer before further action is taken. Where appropriate, the Head Leader will consult with the Designated Safeguarding Lead.

**2.2** Where an allegation or complaint is made against the Head Leader, the matter should be reported immediately to the Chairman of Trustees, or in his absence to the Nominated Governor for Child Protection, without first notifying the Head leader. The allegation will be discussed immediately with the designated officer before further action is taken. The Chairman of Trustee will consult the Nominated Governor for Child Protection and vice versa.

**2.3** Where an allegation is made against any Trustee, the matter should be reported immediately to the Chairman of Trustee or the Nominated Governor for Child Protection. If either the Chairman or the Nominated Trustee are the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the designated officer before further action is taken. Where appropriate, the Chairman of Trustee will consult the Nominated Governor for Child Protection, and vice versa.

**2.4** If it is not possible to report to the Head leader or Chairman of Trustee or Nominated Governor for Child Protection in the circumstances set out above, a report should be made immediately to the Designated Safeguarding Lead or, if she is unavailable, one of the Nominated Designated Safeguarding Deputies. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Head leader or, where appropriate, the Chairman Trustee and the Nominated Governor for Child Protection.

**2.5** The person taking action in accordance with the procedures in this Appendix is known as the "case manager".

**3. Disclosure of information**

- 3.1 The case manager will inform the accused person of the allegation as soon as possible after the designated officer has been consulted.
- 3.2 The parents of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidentiality and data protection, and the advice of external agencies.
- 3.3 Where the designated officer advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents / carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 3.4 The reporting restrictions preventing the identification of a Member of Staff who is the subject of such an allegation in certain circumstances will be observed.

#### **4. Further action to be taken by the organisation**

4.1 An organisation has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The organisation will take action in accordance with *Keeping Children Safe in Education 2019* and the Organisation's employment procedures.

#### **5. Ceasing to use Staff**

- 5.1 If the Organisation ceases to use the services of a member of Staff or volunteer because they are unsuitable to work with children, a settlement / compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the Organisation, with a report being presented to the trustees without delay.
- 5.2 If a member of Staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the Organisation in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.
- 5.3 In cases of professional misconduct, where a Leader has been dismissed, or would have been dismissed had he / she not resigned, separate consideration will be given as to whether a referral to the National College for Teaching and Leadership should be made.

## 6. Unsubstantiated, false or malicious allegations

- 6.1 Where an allegation by a girl is shown to have been deliberately invented or malicious, the Head leader will consider whether to take disciplinary action in accordance with the organisations Behaviour and Discipline Policy.
- 6.2 Where a parent has made a deliberately invented or malicious allegation the Head Leader will consider whether to require that parent to withdraw their child or children from the Organisation on the basis that they have treated the charity or a member of Staff unreasonably.
- 6.3 Whether or not the person making the allegation is a beneficiary or a parent (or other member of the public), the Organisation reserves the right to contact the police to determine whether any action might be appropriate.

## 7. Record keeping

- 7.1 Details of allegations found to be malicious will be removed from personnel records.
- 7.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused. The record will be retained at least until the individual has reached normal pension age or for a period of ten years from the date of the allegation, if this is longer.
- 7.3 An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with ***Keeping Children Safe in Education 2019***, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

## **APPENDIX 6 RE: COVID 19**

Our Organization continues to operate in response to coronavirus in a different manner to usual. However, as more children return, a number of important safeguarding principles remain the same:

- the best interests of children will always continue to come first
- if anyone in the Organisation has a safeguarding concern about any child they will continue to act as per our policy and act immediately
- a DSL or deputy will be available
- it remains essential that unsuitable people will not be allowed to enter the children's workforce and/or gain access to children

Due to the current COVID-19 pandemic, and the stress this has imposed on the home life of children, staff should be on high alert for signs and symptoms of abuse. In addition, staff

should be alert to any signs and symptoms of mental health issues. Thirdly, staff should be alert for any children who may be struggling to deal with bereavement issues.

- The Organisation works with and supports children's social workers, and any other relevant safeguarding and welfare partners.
- It is acknowledged that DSL training is unlikely to take place during this period (although the option of online training can be explored). For the period coronavirus measures are in place, our trained DSL (or deputy) will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.
- The DSL (and deputy) will continue to do what they reasonably can to keep up to date with safeguarding developments, such as via safeguarding partners, newsletters and professional advice groups.
- As the Organisation continues with wider opening the DSL (or deputy) will consider any challenges in a child protection context and reflect them in the child protection policy as appropriate.

#### Staff training and safeguarding induction

All existing staff have already had safeguarding training and have read part 1 of KCSIE. Staff will be made aware of any new local arrangements, especially if these are being reviewed/changed as a result of more children returning, so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers enter the Organisation, they will continue to be provided with a safeguarding induction. An up to date child protection policy will support this process as will part 1 of [KCSIE](#).

#### Identification of vulnerable children

Vulnerable children for the purposes of continued attendance during the coronavirus outbreak are those across all year groups who:

- are assessed as being in need under section 17 of the Children Act 1989, including children who have a child in need plan, a child protection plan, have input from a social worker, or who are a looked-after child
- have an education, health and care (EHC) plan and it is determined, following risk assessment ([risk assessment guidance](#)), that their needs can be as safely or more safely met in the educational environment
- have been assessed as otherwise vulnerable by our Organisation or local authorities (including children's social care services), and who could therefore benefit from continued attendance. This might include children and young people on the edge of receiving support from children's social care services, adopted children, those at risk of becoming NEET ('not in employment, education or training'), those living in temporary accommodation, those who are young carers and others at the Organisation's and local authority's discretion

Local authorities have the key day-to-day responsibility for delivery of children's social care. When relevant, social workers and virtual Organisation heads will continue to work with vulnerable children in this difficult period.

Our staff (supported by the DSL or deputy) will continue to work with and support children's social workers, virtual Organisation heads and any other relevant safeguarding and welfare partners to help protect vulnerable children.

To support the above, we will find opportunity when communicating with parents and carers, to confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

#### Mental health

The current circumstances can affect the mental health of children and their parents in a way that affects behavior.

Some children may return to the organisation having been exposed to a range of adversity including bereavement and long term anxiety. This may lead to an increase in social, emotional and mental health (SEMH) concerns.

The DfE guidance on [mental health and behaviour](#) helps to identify children who might need additional support, and to put this support in place. The guidance sets out how mental health issues can be displayed in a range of different ways, all of which could be an indication of an underlying problem. This can include for example being fearful or withdrawn; aggressive or oppositional; or excessive clinginess.

Additionally, where children have special educational needs and disabilities (SEND), their provision may have been disrupted during partial closure and there may be an impact on their behavior. Some children will need additional support and access to services such as Educational Psychologists, social workers, and counsellors. For children and young people with SEND, it will be especially important to teach new norms and routines around protective measures and personal hygiene clearly and accessibly.

We will work with parents and carers so the girls can access provision from external providers should our own resources not be sufficient. This may be delivered in different ways, for example over the phone for those children still not attending provision, or from specialist staff or support services.

Leaders will be aware of the impact the current circumstances can have on the mental health of those children (and their parents) who are continuing to work from home, including when setting expectations of children's work.

#### Children and online safety away from the Organisation:

We will continue to do all we reasonably can to keep all children safe whilst more children return and others continue to stay at home, who in many cases will continue to engage remotely.

It is important that all staff who interact with children, including remotely, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the child protection policy and where appropriate referrals should continue to be made to children's social care and as required, the police.

We have considered as much as is reasonably possible, if our existing policies adequately reflect that some children (and in some cases staff) may continue to work remotely. In such a case an annex/addendum summarising key coronavirus related changes may be added to those policy(ies).

We will continue to be in regular contact with parents and carers and we will use these communications to reinforce the importance of children being safe whilst communicating remotely. It is especially important for parents and carers to be aware of what their children are being asked to do remotely, including any phone lines they will be asked to access and be clear who (if anyone) their child is going to be interacting with remotely.

Government has also provided:

- support for parents and carers to keep children safe from online harms, includes advice about specific harms such as online child intimate abuse, inappropriate texting, and cyberbullying
- [support to stay safe online](#) includes security and privacy settings, blocking unsuitable content, and parental controls

We will share this support with parents and carers, when considered relevant.

**Our Organisation will ensure any use of remote systems is in line with privacy and data protection requirements.**

### **Change in contact details for CSC**

The name of the first response team for Children's safeguarding has been changed from FAST to MASH and we have changed this in our 'Useful contact list' and made staff aware of the change.

### **Useful contacts**

#### **Hackney Local Authority**

Local Authority Designated Officer (LADO):– 020 8356 6842  
Safeguarding in Education Team – 020 8820 7551 / 7276

#### **Independent Safeguarding Authority (ISA)**

[Scheme.info@homeoffice.gsi.gov.uk](mailto:scheme.info@homeoffice.gsi.gov.uk)  
<http://www.isa-gov.org.uk>

#### **Hackney & City Local Safeguarding Pupils Board**

185 Morning Lane, Hackney, E9 6JX  
020 8356 6082 / 4865

#### **Contact details for CSC:**

First response: 0208 356 5500, Out of hours: 0208 356 2710  
Email: [MASH@hackney.gov.uk](mailto:MASH@hackney.gov.uk)  
City & Hackney Safeguarding Children Board (CHSCB) Tel is 0208 356 4183  
Email: CHSCB is [chscb@hackney.gov.uk](mailto:chscb@hackney.gov.uk)



**Local Authority Designated Officer (LADO)**

Email: [lado@hackney.gov.uk](mailto:lado@hackney.gov.uk)

Tel: 0208 356 4569.