

# Saffron Acres

A Saffron Lane Neighbourhood Council Project  
(Registered Charity No. 508230)



# Safeguarding Children



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## Policy Review Details

|                           |                   |
|---------------------------|-------------------|
| <b>Policy updated by:</b> | <b>Laura Gray</b> |
| <b>Reviewed:</b>          | <b>22.05.2025</b> |

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### **What is child safeguarding?**

Safeguarding means protecting children from maltreatment, abuse or neglect. It also means working together to prevent impairment of children's health or development, and helping children grow up into confident, healthy and happy adults.

### **Who needs to be safeguarded?**

- A child is anyone who has not yet reached their 18<sup>th</sup> birthday.
- Use of the term 'child' should be understood to cover 'children and young people'.

### ***How should I respond?***

If you are concerned a child may be at risk of or experiencing abuse or neglect, you should discuss the situation with a manager or the designated safeguarding lead.

Links to local multi agency and Leicester based safeguarding boards can be found via <https://www.lcitylscb.org/> and <https://llrscb.proceduresonline.com/>

**NSPCC**  
**Learning'**

**Leicester**  
**Safeguarding**  
Children Board



**Safeguarding**  
**Children Board**  
LEICESTERSHIRE & RUTLAND

# 1. ABOUT OUR SAFEGUARDING CHILDREN POLICY

*“Every voluntary, charity and social enterprise should have policies in place to safeguard and protect children from harm. These should be followed, and systems should be in place to ensure compliance in this. Individual practitioners, whether paid or volunteer, should be aware of their responsibilities for safeguarding and protecting children from harm, how they should respond to child protection concerns and how to make a referral to local authority children’s social care or the police if necessary”. (Working Together to Safeguard Children, 2018)*

## 1.1 Policy Purpose

Saffron Lane Neighbourhood Council (SLNC) fully recognises its responsibilities for safeguarding children. The welfare and safety of children are at the heart of our organisation’s ethos and in everything we do.

In this policy, a ‘child’ means all children and young people below 18 years of age. In accordance with relevant law and guidance this policy details our procedures for safeguarding and child protection.

It is applicable to all projects run by the SLNC charity.

Safeguarding and promoting the welfare of children is everyone’s responsibility, whether they work or volunteer with our organisation. Everyone has a role to play in child protection and safeguarding. The charity - where appropriate - adopts a whole-organisation approach to safeguarding children.

All staff and volunteers will ensure that their approach and actions are child-centred– putting the wishes and feelings of victims at the heart of any safeguarding response. This means that they’ll consider, at all times, what is in the best interests of the child.

### **The purpose of this policy statement is:**

- to protect children and young people who receive SLNC’s services from harm. This includes the children of adults who use our services.
- to provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.

This policy applies to anyone working on behalf of SLNC, including senior managers and the board of trustees, paid staff, volunteers, sessional workers, agency staff and students. Anybody involved in planning, organising, overseeing or delivering activities run by any SLNC projects that involve children in any capacity, should read this document. It is also available for parents/guardians of children taking part in activities, and any organisation partnering with SLNC projects in the area of children’s activities.

**We believe that:**

- children and young people should never experience abuse of any kind;
- every child has at all times a right to feel safe and to be protected from any situation or practice that might result in his/her physical or psychological damage;
- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to work in a way that protects them.

We will seek to keep children and young people safe and work together with all relevant safeguarding organisations (such as Local Authority, Clinical Commissioning Group, Police) to safeguard and promote the welfare of children, including identifying and responding to their needs, through;

- Valuing, listening to and respecting children
- Developing, adopting and implementing child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- Ensuring that all staff and volunteers understand their responsibilities with regard to safeguarding and child protection
- Ensuring that all staff are trained to understand the risk factors for all child protection, safeguarding and welfare concerns and know the indicators of abuse, neglect, and exploitation, and know the appropriate reporting mechanism.
- Creating and maintaining an environment where all children feel secure, are encouraged to communicate, and are listened to
- Ensuring that every child understands that they can report any concern to any member of staff, knowing they will be believed and never made to feel like raising a concern is a problem
- Ensuring that staff listen to victims well and know how to report any concerns about sexual violence or harassment between peers
- Having a procedure to deal with any issues of peer-on-peer abuse which includes a robust and credible reporting system which is well-promoted, accessible, and simple to understand
- Ensuring a zero-tolerance attitude towards any form of peer-on-peer harassment, bullying or sexual violence, and appropriate responses to issues we encounter – and never adopting the attitude that sexualised harassment is “just banter” or “boys being boys” and similar attitudes
- Ensuring all staff understand that, even when it isn't formally reported, harassment and sexual violence can, and often does, still occur
- Teaching children to keep themselves safe, including online, from all forms of abuse, bullying, harassment, or exploitation
- Swiftly and effectively addressing any child protection or safeguarding concerns and ensuring robust, timely referrals are made to other agencies in line with local safeguarding protocols
- Ensuring effective links with relevant agencies in all matters regarding safeguarding and child protection, including Early Help procedures
- Supporting children who are subject to child protection plans and contributing to the implementation of the plan
- Appointing a nominated child protection lead for children and young people, and a deputy for safeguarding

- Ensuring that where we are made aware, children who have a social worker, or have been or are currently looked after, are supported to engage positively with the charity projects and achieve good health and educational outcomes
- Keeping meticulous, written records of concerns about children, even where there is no need to refer the matter immediately (this includes recording dates, times, people responsible, and actions), and ensuring all records are kept securely and shared appropriately
- Ensuring the suitability of all staff through safe recruitment practice and maintaining an accurate and up to date staff records, including regular enhanced DBS checks
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- Maintaining clear procedures in line with the latest guidance for reporting allegations against staff members, and using our procedures to manage any allegations against staff and volunteers appropriately
- Ensuring that we have effective complaints and whistleblowing measures in place
- Ensuring that parents, guardians and carers also have an understanding of the responsibility placed on SLNC and its staff for safeguarding and child protection
- Maintaining awareness of those children who are persistently absent or missing from project work, especially if they attend as part of their education (e.g. work experience), and notifying the School or Local Authority as appropriate in line with 'Children Missing in Education' protocols where relevant

Furthermore, SLNC recognises that:

- Some children are at increased risk of abuse.
- Some children face additional barriers with respect to recognising or disclosing abuse.

The charity is committed to recognising diversity and anti-discriminatory practices. We ensure that all children have the same protection. We give special consideration to children who:

- Have special educational needs (SEN) or disabilities.
- Are young carers.
- Show signs of mental health problems.
- Are missing education.
- May experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Have English as an additional language.
- Are known to be living in difficult situations e.g. where there are issues at home, such as substance abuse/misuse, domestic abuse, or where a family member is in prison or has mental health needs.
- Are at risk due to either their own or a family member's mental health needs.
- Are within the care system and are looked after or have been previously looked after or have a social worker.

## 1.2 Safeguarding children

SLNC recognises that safeguarding covers a broad range of areas and it aims to achieve the following:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health and/or development.
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- Enabling children to have optimum life chances, so they can enter adulthood successfully.
- Taking action to enable all children to have the best outcomes.

Child protection refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

As part of meeting a child's needs, SLNC:

- Recognises that the welfare of children is paramount in all the work we do and in all the decisions we take
- Recognises that all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- Recognises that some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Recognises that extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse
- Recognises that working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare and that the sharing of information, particularly with safeguarding partner agencies and other professionals, in a timely manner is crucial in identifying and tackling all forms of abuse and neglect
- Knows that fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. The charity recognises the government's seven golden rules of information sharing. Where any doubt exists, staff will seek support from the DSL
- Recognises that, to facilitate the sharing of 'special category personal data,' the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent. If it is not possible to gain consent, or if to gain consent would place a child at risk, it cannot be reasonably expected that a practitioner gains consent
- Recognises the importance of confidentiality in all data the charity holds and in particular in relation to safeguarding and child protection records
- Will identify children who may benefit from the Early Help process and make timely disclosures to the Local Authority to enable that process to begin, working with

schools, safeguarding partners and other professionals to assist with these assessments and work flowing from these assessments

- Recognises that mental health issues can be an indicator of abuse and neglect, and will share any such concerns appropriately
- Will identify children who may be suffering from significant harm and make child protection referrals
- Will identify children who need extra help and make appropriate referrals, including to early help processes, to prevent concerns escalating

SLNC also understands the importance of contextual safeguarding, i.e. that incidents or behaviours can be associated with factors outside home or school and can occur between children outside of the projects they attend at the charity. All staff should be considering wider environmental factors that are present in a child's life which are a threat to their safety and/or welfare. This information will also form part of any referrals the charity makes, if the organisation considers this appropriate.

SLNC also recognises the importance of partnership working to keep children safe. [Further information about local arrangements can be found later in this document in the relevant section and also via the Leicester, Leicestershire and Rutland Safeguarding Boards and Partnerships

<https://www.lcitylscb.org/media/1830/safeguarding-whats-it-all-about-3.pdf>]

### 1.3 Legislation and guidance

This policy for all projects run by SLNC, including Saffron Acres Project, Saffron Heath Project and Saffron Resource Centre, is derived from a variety of legislative provisions and statutory guidance. In particular, it is based on good practice found in:

- Keeping Children Safe in Education (2021).  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working Together to Safeguard Children (2018, updated 2022)  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Safeguarding and Protecting People for Charities and Trustees (updated 2022)  
<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

Our safeguarding policy and procedures comply with this guidance and with local arrangements published by the local safeguarding boards and Local Authority.

All voluntary, charity and social enterprise organisations need to have appropriate arrangements in place for safeguarding and promoting the welfare of children; these arrangements are incorporated into this policy.

The following legislation is also incorporated into this policy:

- The Children Act 1989 (and 2004 amendment), which gives a broad framework for the care and protection of children and includes provisions for Local Authority inquiries, care proceedings, and emergency provisions.
- Female Genital Mutilation Act 2003 S 5B(11), as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on staff in education to report to the police

where they discover/find that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Responsibilities for safeguarding and supporting girls affected by FGM are found in Statutory Guidance on FGM.

- The Rehabilitation of Offenders Act 1974 which outlines provisions for when people with criminal convictions can work with children.
- 'Regulated activity' in relation to children is found in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006.
- "PREVENT" duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism can be found in: Statutory Guidance on the Prevent Duty.

Other statutory provisions and guidance relevant to child protection and safeguarding include:

- The Education Act 2002 (Section 175) & Education Regulations 2005.
- The Sexual Offences Act, 2003, Home Office.
- Teaching Online Safety in Schools, 2019, DfE.

### **Related Policies**

Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

This document must therefore be read, used, and applied alongside other policies and procedures within the organisation, including (but not limited to):

- Identity, qualification, and vetting checks for all staff and volunteers, such as background checks and enhanced DBS checks where relevant.
- The staff safer recruitment and selection processes.
- Local Authority policies and procedures on dealing with allegations against members of staff.
- Guidelines for visitors.
- Safer working practices guidelines for staff and volunteers.
- Staff, volunteer, service user and visitor codes of conduct (any and all that apply to the individual projects run by SLNC).
- Data protection and GDPR policy.
- Attendance / non-attendance policy; particularly post-16 work experience, work placements, supported internships and young people volunteering through third party organisations such as LEBC (Leicester Education Business Company), NCS (National Citizens Scheme), Duke of Edinburgh Award, and others – in addition to those attending with visiting educational and school groups, extra-curricular groups, community groups and others.
- The health and safety policy.
- First aid policy.
- The whistleblowing policy.

## 1.4 Our Policy in Relation to Government Guidance

*This information is taken directly from Working Together to Safeguard Children (2018) available on the government website. It directly relates to our organisation and summarises key, relevant information all staff at SLNC must know and understand.*

### **Voluntary, charity, social enterprise, faith-based organisations and private sectors**

- Voluntary, charity, social enterprise (VCSE) and private sector organisations and agencies play an important role in safeguarding children through the services they deliver. Some of these will work with particular communities, with different races and faith communities and delivering in health, adult social care, housing, prisons and probation services. They may as part of their work provide a wide range of activities for children and have an important role in safeguarding children and supporting families and communities.
- Like other organisations and agencies who work with children, they should have appropriate arrangements in place to safeguard and protect children from harm. Many of these organisations and agencies as well as many schools, children's centres, early years and childcare organisations, will be subject to charity law and regulated either by the Charity Commission and/ or other "principal" regulators. Charity trustees are responsible for ensuring that those benefiting from, or working with, their charity, are not harmed in any way through contact with it. The Charity Commission for England and Wales provides guidance on charity compliance which should be followed. Further information on the Charity Commission's role in safeguarding can be found on: the Charity Commission's page on Gov.uk.
- Some of these organisations and agencies are large national charities whilst others will have a much smaller local reach. Some will be delivering statutory services and may be run by volunteers, such as library services. This important group of organisations includes youth services not delivered by local authorities or district councils.
- All practitioners working in these organisations and agencies who are working with children and their families are subject to the same safeguarding responsibilities, whether paid or a volunteer.
- Every VCSE, faith-based organisation and private sector organisation or agency should have policies in place to safeguard and protect children from harm. These should be followed and systems should be in place to ensure compliance in this. Individual practitioners, whether paid or volunteer, should be aware of their responsibilities for safeguarding and protecting children from harm, how they should respond to child protection concerns and how to make a referral to local authority children's social care or the police if necessary.
- Every VCSE, faith-based organisation and private sector organisation or agency should have in place the arrangements described in this chapter. They should be aware of how they need to work with the safeguarding partners in a local area. Charities (within the meaning of section 1 Charities Act 2011), religious organisations (regulation 34 and schedule 3 to School Admissions) and any person involved in the provision, supervision or oversight of sport or leisure are included within the relevant agency regulations. This means if the safeguarding partners name them as a relevant partner they must cooperate. Other VCSE, faith-based and private sector

organisations not on the list of relevant agencies can also be asked to cooperate as part of the local arrangements and should do so.

### **Our Organisation**

SLNC (and the projects it runs) is not itself a school or registered educational institution. However, some of the projects run by SLNC do work closely with schools, colleges, and other educational institutions, and children. Examples of this are mainly through the Saffron Acres & Saffron Heath projects, and include, but are not limited to:

- Leading activities for schools visiting the projects
- Providing work experience, placements and internships
- Running volunteering programmes
- Hosting third party programmes on our project site (either with Saffron Acres staff involved in providing sessions or through facilitating sessions by being present while visiting school staff lead sessions)
- Providing a site and facilities for other organisations with our staff being “on-call” but not physically present

All staff on a hosting project (such as Saffron Acres or Saffron Heath) must be aware of the safeguarding protocols of the visiting academic, educational or other third party organisation involving children, which must form part of any site user agreement or service user contract. If a project is hosting or facilitating a self-referral (e.g. Saffron Acres project is hosting a young person on a work experience day) an agreement must be agreed and signed by an adult responsible for them. Protocols for variations to this are set out below:

### **Where staff from a visiting school / organisation attend the project with their pupil(s) / group:**

- Any potential safeguarding incident must be reported immediately to the lead staff of the visiting group / student and their protocols followed per the site user agreement.
- A report of SLNC staff involvement must still be given to our DSL by the end of the working day who will record and assess the need for the extent of our involvement on a case-by-case basis, and ensure SLNC operate fully with any third party as necessary.
- Examples include; hosting school groups, providing activities for NCS students, running sessions for Guide and Scout groups, facilitating NHS Big Cook Little Cook sessions, etc

### **Where a young person attends directly without a member of staff from a third party organisation:**

- A full risk assessment must be carried out in advance and all appropriate measures taken to ensure the safety of the child
- An agreement must be signed by an adult responsible for the child or young person

- Any potential safeguarding issue must be reported via the guidance in this document and any relevant third party notified within 12 hours (e.g. a school or organisation who have arranged a work experience placement)
- No **child under the age of 11** may attend the project without an adult present and responsible for them
- **Children aged 11-16** may only attend an activity / session on their own after an initial on-site induction with the child and their responsible adult present. After this, a decision will be made by SLNC staff as to the suitability of accepting the child onto a session / programme. If a decision is made to accept a child aged 11-16, one of our partner or suitable third party organisations **must** then be notified and **their protocols followed**. For most young people, this will be their school as most sessions run during 'school time', but other cases (such as a home-schooled child) may alternatively be referred to LEBC or VAL and enrolled to us through their programmes and their protocols then followed.
- **Young people aged 17-18, (and in some cases 19 if still in education)** may self-refer to programmes run by SLNC projects. Efforts must be made in good faith to refer the young person through a partner / third party organisation (such as an NCS programme or their college work experience programme for example). Where this is not possible, the young person **must** attend an extended on-site interview with a senior member of SLNC staff, who will then consider the suitability for their acceptance to a programme or session on a case-by-case basis. If accepted, an **enhanced agreement** must be made with an adult responsible for the young person, which will be based on the most up-to-date policies set out by LEBC and VAL in their guides to good practice. The DSL and all senior staff must be made aware of all arrangements and agreements made for the young person to attend. A named member of senior staff will be appointed to ensure appropriate training and mentorship is provided, and who will be responsible for overseeing the young person's supervision.
- **Individuals 19-21** may self-refer to programmes run by SLNC, although not legally considered a 'child', our organisation requires special consideration be taken due to the nature of our project sites. In these cases, safeguarding adults procedures must be followed with the additional awareness that the individual may still be in education, in which case, efforts must still be made in good faith to enrol them via a third party organisation (such as through their college or university volunteering / research / placement programme or similar). Where this is not possible, the individual may still attend a site induction and register with us appropriately (e.g. as an adult volunteer or service user) and all SLNC organisation policies followed.
- **Staff working on projects run by SLNC (such as Saffron Acres and Saffron Heath) working with children must familiarise themselves with the appropriate protocols and third party agreements that are in place for each child and young person visiting the project in any capacity.**

## 1.5. Responsibilities

SLNC recognises that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their parents, those with parental responsibility or carers, has a role to play in safeguarding children.

### All staff must:

- Provide a safe environment in which children can learn, play and socialise.
- Be able and prepared to identify any child in need of early help.
- Be able to reassure victims that they are being taken seriously, and will be supported and kept safe. Staff should never give the impression that reporting abuse causes problems, and victims should not feel ashamed.
- Be aware of the role of the DSL, including how and when to contact them.
- Follow the organisation's reporting structures for safeguarding concerns.
- Be able and prepared to deal with any safeguarding concern including knowing who to speak to and understand how to deal with sharing information and confidentiality issues.
- Receive appropriate training about safeguarding and child protection which is updated at least annually or as required.
- Understand the child protection process, and relevant legislation, and be aware of local arrangements for the early help process (sometimes referred to as the common assessment framework), understanding their role in each.
- Be aware of what to do if a child tells them about being abused, neglected, or exploited.
- Be able to recognise physical abuse, emotional abuse, sexual abuse, and neglect, as well as safeguarding issues surrounding child sexual exploitation (CSE), child criminal exploitation (CCE) including county lines, peer-on-peer abuse, serious violence, PREVENT-related issues, and female genital mutilation (FGM) - AND understand that often safeguarding issues overlap.
- Be aware that safeguarding concerns can be linked to, or caused by, factors in a child's wider environment outside of the family, such as sexual and criminal exploitation, and serious youth violence. This is often referred to as contextual safeguarding.
- Be aware that mental health issues can be a significant indicator of abuse or neglect.
- Be able to report concerns about safeguarding arrangements within their school or other setting they are visiting from where relevant; and know not to hesitate before doing so.
- Know what to do if a child is missing from education (or other relevant situation, such a child not attending a work experience session at Saffron Acres).

Further information to support staff to fulfil these responsibilities is contained throughout this policy and is covered in the organisation's safeguarding and related training programme, which is carried out by a competent third party trainer.

### **The charity will, as part of their responsibilities:**

- Have responsibility for safeguarding in the organisation.
- Will ensure that all projects run by SLNC are compliant with duties under relevant legislation and statutory guidance. This includes making sure that policies, procedures, and training are effective.
- Ensure that a DSL is appointed who has the status and authority to carry out all of the DSL duties. The management committee will also ensure the DSL has the time, training, and funding to carry out the role.
- The DSL will ensure all staff are appropriately trained in child protection and safeguarding issues (including online safety) both at induction and on an ongoing basis. Compliancy will be overseen by the management board.
- Ensure that there is a whole-charity approach to safeguarding, i.e. safeguarding and child protection should be at the front of thinking and should underpin relevant policies and procedures. Policies and procedures should all operate with the best interests of the child at their heart.
- Ensure that all projects run by SLNC create a culture that safeguards and promotes the welfare of children. This includes ensuring unsuitable people are not employed by the organisation and ensuring compliant safer recruitment practices are in place, e.g. making sure that those involved in recruitment are trained in Safer Recruitment.
- Ensure mechanisms are in place to fulfil safeguarding responsibilities to those children who are “looked after”.
- Ensure that each individual project has appropriate and relevant systems for dealing with safeguarding issues which are “well promoted, easy to understand and easily accessible for children confidently to report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback”.
- Ensure that these policies and procedures reflect the challenges SEND children can face in terms of safeguarding -e.g. communication barriers and increased risk of bullying - and allow for identification of any mental health issues that children may be experiencing.
- Ensure that all learning is, where necessary, tailored and contextualised for individuals including more vulnerable children, victims of abuse and some SEND children.
- Ensure everyone is aware of, and understands, local arrangements for safeguarding and contributes to multi-agency working where appropriate.
- Ensure that training for staff reflects the organisation's expectations around managing behaviour effectively.
- Ensure child protection files are maintained properly.
- Ensure that the all staff recognise the importance of sharing information to keep children safe.
- Ensure the organisation has appropriate safer recruitment policies and procedures in place, including ensuring that staff are appropriately DBS checked if appropriate.
- Ensure that any hire agreement or similar contract for use of site premises, particularly Saffron Acres and Saffron Heath, includes safeguarding requirements – any breach should lead to termination.

- Assess the impact of this policy in keeping children safe.
- The Designated Safeguarding Lead will review and annually approve the safeguarding policy, ensuring it complies with all law, regulations, and good practice. They will also hold the organisation to account for its implementation.
- Ensure compliance with Charity Commission requirements around child protection and safeguarding.

**The DSL will, as part their responsibilities:**

- Be responsible for the implementation of this and all related policies and procedures, ensuring that the outcomes are monitored.
- Meet regularly with staff, and report to the Management Committee regularly, regarding the effectiveness of safeguarding and implementation of related policies.
- The Management Committee will ensure that the DSL has all appropriate time, funding, training, and resources to fulfil all of their functions and ensure adequate cover in the event that the DSL isn't available.
- Ensure that everyone connected to the organisation is aware, understands and follows this policy, including safeguarding, child protection procedures, online safety and other relevant policies as necessary.
- Ensures that everyone has appropriate training, including online training – at induction and regularly thereafter.
- Take a risk-based approach to the information that visitors to the various projects run by SLNC should receive.
- Ensure safe recruitment practice is followed when recruiting for posts, and act as a case manager when an allegation is made against a member of staff or volunteer. This includes being the recipient of any low-level concerns (i.e. those that do not meet the threshold).
- Ensure there is a robust system for gathering all appropriate checks in relation to all staff, volunteers, and visitors.
- Ensure the organisation offers a safe environment via a robust health and safety policy and procedure to meet the statutory responsibilities for the safety of children and staff at the charity.

The Designated Safeguarding Lead is the lead for child protection and safeguarding in the organisation. This is one part of their responsibilities for safeguarding and child protection, which also include:

- Having the appropriate status and authority to carry out their role.
- Having the time, support, training, funding, and resources to be able to deliver all their functions as a DSL.
- Delegating certain functions (except lead responsibility) to a competent deputy, who can be contacted when the DSL is away or absent from the charity.

### **The role of DSL includes:**

- Being available via phone call or other media if they are not physically present, for staff, volunteers, parents, or children to provide advice and support on child welfare, safeguarding, and child protection matters.
- Being the point of contact for staff who have a concern about a child's welfare, safeguarding, or a child protection issue, including where the concern involves a mental health issue.
- Acting as a point of contact for safeguarding partners - for example, the police in relation to Operation Encompass where teachers and a school are involved as necessary - and, where required, taking part in and contributing to strategic discussions and interagency meetings, and supporting other staff to engage with this process.
- Liaising with other staff (as needed) - for example, pastoral teams or senior mental health leads and SENCos - when referring matters to children's social care, so that the reports are as holistic as possible.
- Ensuring that account is taken of the risk to children outside of their families and considering whether children are at risk of abuse relating to exploitation and serious violence.
- Where a safeguarding concern has a mental health element, ensuring discussions are had with the senior lead for mental health.
- Managing referrals to the Local Authority Children's Services or other services (such as the police where a crime has been committed), or to the Channel programme, or the DBS (where someone has been dismissed or has left because of the harm they have caused or the risk of harm they pose to children).
- Liaising with other agencies and partners in cases where early help is considered the most appropriate response, and contributing to any ongoing support and further assessments.
- Working closely with children's social care and any child's social worker – in particular where there is a statutory response, and ensuring that actions the organisation proposes to take do not jeopardise an ongoing investigation.
- Where children's social care do not investigate, the DSL should not be afraid to refer again or challenge the decision. If the decision remains not to investigate, the DSL should look for other support such as early help.
- Where there has been an allegation/report of sexual violence, the DSL will support by advising the organisation how to proceed, including undertaking an immediate risk assessment of need (risk assessments should be considered on a case-by-case basis for reports of sexual harassment). The risk and needs assessment should include:
  - The victim and how best to support them.
  - Whether it is a single victim.
  - The alleged perpetrator.
  - Risks to other children.

The risk assessment must be dynamic and retained in electronic form.

- Taking the lead role in any decisions about sexual violence or sexual harassment which are reported to the organisation.
- Where an allegation is proved to be unsubstantiated, unfounded, false, or malicious, the DSL will consider whether the person who made the allegation is in need of support for other abuse – and whether the report could be a cry for help. If so, the DSL should consider whether or not to refer to children's social care.
- Where there has been an allegation against a member of staff which is judged to meet the threshold (for referral to the LADO), ensuring the child is not at risk and determining whether or not the case should be referred to children's social care as a suspected abuse case.
- Being aware of local protocols and arrangements in respect of the PREVENT referrals.
- Being aware of local arrangements for Early Help.
- Being aware of all the local and national support systems in place for victims of sexual violence.
- Being the point of contact for all peer-on-peer reports, and being aware of issues and supporting actions where consent or power balances are in issue - for example, in sexual violence reports.
- Making referrals (where appropriate) to the Cyber Choices programme when a child may be involved in cybercrime.
- Where someone reports FGM, deciding whether or not to refer the matter to children's social care.
- Encouraging a culture of supportive engagement with parents/carers around safeguarding and child welfare – this is especially so in circumstances where the family may be encountering challenging circumstances.
- Ensuring children's views are heard by encouraging a culture of listening, taking account of their wishes and feelings, and building trust between children and staff so that communication and reporting issues is most effective.
- Working with a range of colleagues to promote the educational outcomes of 'children in need' by understanding the extra challenges this cohort can face because of the safeguarding/welfare or child protection issues they have been involved in.
- Thinking about how the issues can affect attendance, engagement, and achievements for children.
- Knowing the cohort of students who have or have had a social worker and ensuring their academic progress, attainment, and aspirations.
- Supporting staff to help with any reasonable adjustments or extra support to assist the above group, recognising that even where statutory services support has ended, there can be long term consequences for the child.
- Sharing information (as appropriate) with staff to achieve these goals for this cohort.
- Providing support for staff so that they are confident about welfare, safeguarding, and child protection issues - including during a referral process - and helping them to see the links between safeguarding and academic/pastoral support.

In relation to child protection files the DSL must:

- Keep clear, accurate, up-to-date records of any concerns, actions taken, and how these were followed up. The DSL will also support staff to keep records in this way. Records must be held securely and only shared with those who need to know – in line with data legislation and regulations.
- Hold files separately from the main file. Transferring them to their school as soon as possible and no longer than 5 days after creation or addition to a file. The DSL must obtain a receipt for the file.

In relation to policies and procedures, the DSL must ensure that:

- The organisation's child protection policy and procedures are reviewed annually and always remains up to date.
- Staff have access to and understand the organisation's child protection policy and procedures, and it is available publicly.
- Staff are aware of local safeguarding arrangements.

The DSL should also receive appropriate training (including PREVENT) to undertake all their role and responsibilities, and this includes:

- Understanding about specific needs that can increase vulnerability as well as specific harms that put children at risk.
- Understanding the assessment process for referrals to LA, including those relating to early help and child protection.
- Understand the importance of information sharing with other agencies.
- Understanding how important their role is for providing information to children's social care so that children can be safeguarded, and their welfare promoted.
- Understanding the effect adverse childhood experiences and trauma can have on children, including the impact it can have on behaviour, mental health, and educational outcomes.
- Understanding and being alert to the specific vulnerable groups such as children in need, with SEND, or with other health conditions.
- Supporting the organisation with fulfilling its PREVENT duty and stay up to date with the latest guidance in relation to PREVENT.
- Being aware of local protocols and how to use them – for example, when contacting the police about a serious violent sexual offence such as rape.
- Being aware of the contact details for the local housing authority so that any issues of homelessness can be referred correctly and swiftly.
- Understanding the risk for children posed by online activity, and the risk for specific groups, such as those with SEND.
- Understanding the barriers that stop children from reporting issues and how to build trust to help with this.
- Building a culture of listening and making sure the wishes and feelings of the children are considered, and encouraging staff in the measures the organisation may put in place to promote this.
- Having the ability to keep accurate, detailed, secure written records of safeguarding and welfare issues.

## 2. CHILD PROTECTION AND SAFEGUARDING PROCEDURES

All staff within the SLNC organisation will follow the necessary child protection procedures if an incident occurs.

### 2.1 Where there is a child protection or safeguarding concern about a child or young person

#### The DSL or Deputy DSL will:

- Ensure the allegation is acted on immediately, no later than within the same day.
- Determine the most appropriate course of action:
  - Where the allegation reveals a risk of significant harm or the child is in immediate danger, the DSL will refer the matter to the police and/or children's social care. Children's social care should respond within 1 day. There are a range of responses available to social care. If the concern meets their threshold for intervention, children's social care will begin assessments and investigations under the Care Act 1989 (normally under Section 17 or 47). It may be that the DSL or a member of staff will be asked to be involved in these assessments – if this is the case, the DSL will offer support to all members of staff.
  - Where the risk is considered to be less serious, the DSL may start the procedure for Early Help. This may be a multi-agency response, and the organisation may be asked to lead on this process as the lead professional. Staff may be asked to have input in this process. If, at any time during Early Help, those involved consider the risk to the student has escalated, the matter must then be referred to children's social care.

#### If a DSL or deputy is not immediately available:

- Where a child is in immediate danger or at risk of significant harm, and the DSL or senior leader is not available, a referral should be made to children's social care and/or the police immediately.
- Anyone can make a referral to the police in an emergency, or to children's services if there is a child protection or safeguarding concern.
- Where staff have a concern about a child that does not raise an issue of either immediate harm or a risk of significant harm, the staff member should not delay but, in the first instance, speak to a member of the SLT or contact the Local Authority children's services to determine the most appropriate way to proceed.
- Staff should not assume that somebody else will take action/share information that might be critical in keeping children safe.
- Where referrals are not made by the Designated Safeguarding Lead, the Designated Safeguarding Lead should be informed, as soon as possible, that a referral has been made.

- All staff and other designated professionals are responsible for reporting concerns relating to FEMALE GENITAL MUTILATION (FGM) and reporting is mandatory where either the individual:
  - Is informed by a girl under 18 that an act of FGM has been carried out on her; or they
  - Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

They can also discuss the concern with the DSL, who will offer support and help.

Where a member of staff at SLNC suspects that any child may have been subject to abuse, neglect, or exploitation - or a child has suggested that abuse has taken place - the Designated Safeguarding Lead (DSL), or the Deputy DSL if the DSL is off site, must be informed immediately.

### **Allegations or concerns about serious peer-on-peer abuse which require a safeguarding or child protection response**

- In the case of a violent sexual assault or sexual harassment, SLNC will follow the latest procedures as set out in Part 5 of Keeping Children Safe in Education 2021.
- Staff must record the allegation and report it to the DSL immediately, but not investigate it themselves.
- The DSL will contact the Local Authority children's social care team and follow its advice, as well as the advice of the police, if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made, and any others affected) with a named person they can talk to if needed. Where there is a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.
- The DSL can, where appropriate, contact the children and adolescent mental health services (CAMHS).

Where a child's behaviour causes significant harm to other children, staff should follow the child protection procedures for the organisation. The DSL will refer the child in line with the local area safeguarding protocol for these children.

Where the issue involves 'sharing nude or semi nudes' (also known as sexting) by using online communications, text, or image messaging, please refer to the online safety policy. The Child Exploitation Online Protection Centre (CEOP) also provides further guidance on sexting at <https://www.ceop.police.uk/safety-centre/>. Other guidance is available: <https://www.gov.uk/government/publications/sharingnudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

### **Where there is an issue relating to radicalisation or extremism**

- The DSL will be the first point of contact for any issues of concern in relation to extremism.
- If the DSL is not available, staff should speak with a member of the SLT or children's social care. If it is an emergency situation, the member of staff should call 999 or the confidential anti-terror hotline: 0800 789321.
- There is also a dedicated phone line at the Department of Education which offers help and guidance to staff and governors: call 0207 340 7264 or email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk).
- The DSL will assess the level of risk and decide which agency to make a referral to. This could include **Channel** - the government's programme for identifying and supporting individuals at risk of being drawn into terrorism - or the local authority children's social care team.

### **Where a child is identified as being at risk of exploitation, radicalisation, FGM, peer-on-peer sexual abuse, or becoming involved in serious violent crime**

- Where risk factors (such as a child with a mental health need, a parent in prison, persistent absences from school, or a risk of FGM) are present but there is no evidence of abuse or a particular risk, the DSL at SLNC will advise staff on preventative work that can be done either within the organisation or together with partners, including organisations who have referred young people to us (such as for work experience placements). This is often referred to as Early Help.
- The DSL may decide to notify the Multi-Agency Safeguarding Hub (MASH) so that a strategic overview can be maintained and any themes or common factors can be recognised. The organisation will set timelines, monitor and review the situation, and take appropriate steps or seek advice as required.
- The DSL may also seek advice about undertaking an early help assessment and/or making a referral to social services or involving the Local Safeguarding Children's Partnership. If, during or after assessment, the concerns about the child turn out to be more significant and meet the additional needs/complex need criteria, the DSL will refer the matter to the MASH.
- It may be appropriate to speak with the child's family. The DSL will take this decision and may well be the person who talks to the child's family.

*For more information regarding the above, see Section 5 on specific safeguarding concerns*

## 2.2 Allegations against members of staff

All organisations that work or come in to contact with children and young people need to be aware of the possibility that allegations may be made against members of their staff or volunteers. It may be difficult to accept that abuse could occur in your organisation or that the person being named could be responsible, but all allegations must be brought to the attention of the DSL immediately. In line with KCSIE 2021, the organisation has two levels of allegation management. The first is allegations which meet the threshold, and the second is in relation to low-level concerns.

Where the allegation meets the threshold, the DSL will act as the “case manager”. They will conduct basic enquiries to ascertain whether there is any foundation to the allegation, and will liaise with the LADO and other authorities as appropriate. In the event the DSL is the subject of the allegation, the deputy DSL will report to the Chair of SLNC immediately, and the Chair will assume the role of “case manager”.

### **The threshold may be met in the following circumstances:**

- They have behaved in a way that has harmed a child or may have harmed a child.
- They possibly committed a criminal offence against or related to a child.
- They have behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- They have behaved towards a child or children in a way that indicates he/she is unsuitable to work with children. This includes behaviour outside of school that might make the person unsuitable to work with children (known as a transferable risk).

In some cases, allegations may be so serious that they will require immediate intervention by the police and/or children’s social care services. If this is the case, the DSL will ensure that the appropriate action is taken.

**Low-level concerns are those which do not meet the threshold** for referral to a LADO or the police but, as part of an open culture to safeguarding, should be talked about. Everyone is encouraged to report low level concerns, even by way of a self-referral, so that inappropriate or concerning behaviours are dealt with early and professional boundaries are maintained.

A low level of concern would be where, for example, a member of staff behaved in a way that is inconsistent with the staff code of conduct, but it isn’t considered serious enough to refer to the LADO such as a staff member being over-friendly with children, using inappropriate language, favouring a child or picking on a child, making inappropriate social media posts, making fun of a child’s work, making fun of a child in front of other children, or accompanying a child home from an event alone (albeit with the parent’s consent).

Low-level concerns will be dealt with efficiently and appropriately in line with the organisation's staff code of conduct policy] and, where appropriate, any other relevant policy - for example, the data protection policy. In the event of a low-level concern being raised with the DSL, they will:

- Collect evidence from witnesses and from the person concerned.
- Collate the information and advise what actions should be taken – this could range from a conversation with the person to a warning or formal disciplinary proceedings.
- Keep a record of the concerns.

All information will be held in confidence and securely, in line with data protection laws (the Data Protection Act 2018 and UK GDPR).

Records will be reviewed regularly to identify any patterns or systematic issues within the school. Patterns of staff behaviour could result in a more serious concern that meets the threshold test or results in disciplinary action for an individual. Records will be maintained in line with SLNC's Data Retention and Disposal Policy and Procedure.

## 2.3 Allegations Against the DSL

In cases where the allegation is against the DSL, the complaint must be taken to a more senior member of the organisation or you must take the following action yourself:

- Make sure that the child or young person is safe and away from the person alleged to have abused them
- Contact Children's Social Care as explained above
- Contact the parents/carers of the child if advised to do so by the social worker or police officer in charge of the investigation
- Irrespective of any investigation by Children's Social Care or the police, you should follow the appropriate disciplinary procedures. Common practice is for the alleged abuser to be suspended from attending the organisation or workplace until the outcome of any investigation is known
- Consider whether the alleged abuser has access to children anywhere else and whether those organisations or groups need to be informed
- Act upon the decisions made in any strategy decision.

All incidents will be investigated internally, after any external investigation has finished, to review practice and put in place any additional measures to prevent a similar thing happening again.

Our organisation will develop and encourage an environment where people feel safe to express their concerns about the practice of others. If a staff member, volunteer or participant has concerns they should not be victimised in any way for expressing them. It is also important that the organisation has support systems for the person who faces an allegation. As well as providing immediate support, advice will be given on accessing appropriate outside help such as counselling or legal services.

## 2.4 Suitability of staff and safe recruitment practices

To reduce the risk of abuse to children and the likelihood of allegations being made that are founded, every organisation must have clear and rigorous recruitment procedures.

Our organisation recognises that safe recruitment practices are an essential part of creating a safe environment for children and young people. Consequently, we will ensure that staff (including contractors) and volunteers working at the organisation are suitable to do so and therefore do not pose any kind of risk to children and young people.

It is a fact that a small minority of predatory adults will try to gain access to children, through organised activities, with the intention of harming them. It is important, therefore, that we take steps to prevent unsuitable adults taking part in or supervising activities that give them opportunities to befriend and harm children. SLNC will ensure our staff, freelance workers and volunteers are carefully selected, screened, trained and supervised. We will apply the same standards in the recruitment of volunteers for regulated work with children as we do with staff or freelance workers.

### Selection

- All prospective workers to our organisation will complete an application form which asks for details of previous employment.
- Short listed applicants will be asked to attend an interview.
- Short listed applicants will be asked to provide two references and these will always be taken up prior to confirmation of an appointment. Referees are reminded that they should not misrepresent the candidate or omit to say things that may be relevant to their employment.
- The successful applicant will be asked to complete a self-declaration form.

### Screening

- All successful applicants in regulated activity with children must have an appropriate enhanced DBS record check prior to taking up the post.
- All prospective workers will be interviewed appropriately to establish previous experience of working in an environment where there is contact with children and their perceptions of acceptable behaviour.
- All appointments to work with children will be subject to a probationary period
- New members of staff have clear responsibilities and work to an agreed job description
- This policy, as well as all other organisational policies, will be made available for all staff members and volunteers and form part of the induction process.
- All staff/volunteers sign to confirm they have received these, will read, and ask a Supervising Officer if they have any questions/queries. An email is sent out to all staff/volunteers when policies are updated so they are made aware of any updates.

## Training

- All staff/volunteers receive an induction and sign to confirm this. They also receive appropriate Safeguarding training and any updated copies of both the Children and the Adults Safeguarding Policies as well as health and safety, as well as all other appropriate training, as necessary.
- Ongoing training on specific areas such as health and safety and child protection will be provided for Board members staff, freelance workers and volunteers and will be regularly reviewed.

## Supervision

- All staff, freelance workers and volunteers will have a designated supervisor who will provide regular feedback and support.
- Appropriate members of the management staff are required to complete Safer Recruitment Training in order to ensure that one panel member on every selection panel is trained in 'Safer Recruitment'.

## Refer someone to Disclosure and Barring Service (DBS)

Employers must [refer someone to DBS](#) if they:

- sacked them because they harmed someone
- sacked them or changed their role because they might have harmed someone
- were planning to sack them for either of these reasons, but they resigned first  
SLNC recognises it is breaking the law if we do not refer someone to DBS when we should. To do this, we will contact the helpline for help referring someone to DBS. **DBS helpline:** 0300 0200 190

## Additionally;

- We will notify Disclosure and Barring Service if we know anyone on the Disqualified from Working with Children List applies to work for or volunteer with our group.
- We will ensure that all staff, freelance workers and volunteers are given Child Protection Good Practice Guidance to work to (See Appendices)
- We will remove from unsupervised contact with children any member of staff or volunteer whom we know or suspect to have caused harm to a child or to have placed a child at risk of harm
- We will refer to DBS any person we know or suspect to have caused harm to a child or placed a child at risk of harm, even if that person has left our project.
- In addition to making a referral to DBS, child protection issues will be referred to the child protection agencies (i.e. social work and/or police) for appropriate investigation and any issues of a criminal nature will be reported to the police.

## 2.5 Complaints and whistleblowing

Where a staff member at SLNC feels unable to raise an issue with the school, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. The organisation has a dedicated Whistleblowing policy, which details what steps staff can take. General guidance on whistleblowing can be found on the government website.

The NSPCC's "What You Can Do to Report Abuse" dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their organisation. Staff can call 0800 028 0285, which is available from 8:00am to 8:00pm, Monday to Friday, and email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 2.6 Training

SLNC ensures all staff complete safeguarding and child protection training as part of their induction. This includes online safety and whistleblowing procedures and is designed to ensure all staff:

- Understand the organisation's safeguarding systems and
- Their responsibilities, and
- Can identify signs of possible abuse or neglect or exploitation,
- Know how to act upon any concerns they have.

All training is integrated, aligned, and considered as part of the whole-organisation safeguarding approach, including training on the issues and expectations in relation to allegations of peer-on-peer abuse. Training is considered as part of wider staff training and session planning.

All training is in line with expectations and arrangements from our local safeguarding partners. The organisation also has a commitment to updating safeguarding training (including online safety) for all staff annually, and more regularly as required, through e-bulletins, CPD, or using the knowledge base of local partners or staff members (e.g. the Senior Mental Health Lead).

To achieve this:

- Time will be given to enable this commitment to be met.
- All staff and volunteers (where appropriate) who are new to the organisation will be given appropriate safeguarding training as part of their induction programme to the organisation.
- Updates will feature regularly in all staff meetings, as appropriate.
- All staff and management board members will undertake the training.
- Newly recruited staff will complete training as part of their induction and will receive role-specific training, including being made aware of local risk factors for extremism.
- The DSL will attend Local Authority and other training courses as necessary and other appropriate inter-agency training every year.
- The DSL will attend PREVENT training and this will be cascaded to all staff.
- Contractors will receive safeguarding training where required or when otherwise considered necessary.

## 3. Prevent duty - Safeguarding children who are vulnerable to extremism

The current threat from terrorism and extremism in the United Kingdom is real and severe. It can involve the exploitation of vulnerable people, including children and young people. Some concerns which may be identified could carry a security risk because of the violent nature of the groups attempting to exploit the vulnerability of the individuals concerned. It is important therefore to involve Leicester Police at an early stage and follow the designated procedure for sharing information and where appropriate making referrals (i.e. via the 'Channel' process – see below).

### 3.1 National PREVENT Guidance and Strategies

PREVENT is a key part of the Government's strategy to stop people becoming terrorists or supporting terrorism. Early intervention is at the heart of PREVENT in diverting people away from being drawn into terrorist activity. PREVENT happens before any criminal activity takes place. It is about recognising, supporting and protecting people who might be susceptible to radicalisation.

The national PREVENT strategy objectives are:

- **Ideology:** respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- **Individuals:** prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- **Institutions:** work with sectors and institutions where there are risks of radicalisation which we need to address

### 3.2 The organisation's PREVENT strategy

SLNC follows the government guidance on the organisation's responsibility to fulfil our PREVENT Duty. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children to hold extreme views including those justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation. The PREVENT strategy aims to stop people from becoming terrorists or supporting terrorism.

It is rare for children to become involved in terrorist activity. However, some young people from an early age can be exposed to terrorist and extremist influences or prejudiced views. Consequently, the organisation takes the view that early intervention is always preferable and includes this in its procedures as it does for all safeguarding concerns.

In line with both the fundamental British Values and the School Values, the following key principles underpin the community in which the organisation is based:

- Inclusion.
- Tolerance.
- Freedom of speech.
- The expression of beliefs and ideology.

Both children and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility. Free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the principles in which freedom of speech is valued.

Free speech is subject to treating others with respect, understanding differences, equality, an awareness of human rights, community safety, and community cohesion. SLNC follows PREVENT guidance to have clear protocols for ensuring that any visiting speakers are suitable, appropriately supervised, and undergo the same checks as other visitors.

The organisation is committed to training all staff in connection with the issues arising from our PREVENT Duty. We are also committed to working with the Local Authority and other local partners to assess the potential risk of individuals being drawn into terrorism, because families and communities play a key role in ensuring young people and our communities are safe from the threat of terrorism.

The DSL will keep up-to-date with local threats, policies, and procedures relating to Prevent.

### **3.3 Reducing risks of extremism**

Professionals are expected to help to protect children from extremist and violent views in the same ways that they help to safeguard young people from drugs, gang violence or alcohol. The purpose must be to protect young people from harm and to ensure that they are worked with in a way that is consistent with our stated values and the law.

The Designated Safeguarding Lead will work with partners and the Local Authority's risk assessment to determine the potential risk of individuals being drawn into terrorism.

#### **Actions will include:**

- Promoting spiritual, moral, social, and cultural development for children
- Creating an atmosphere of openness and safety so that children feel free and able to discuss sensitive topics, including terrorism and extremism.
- Ensuring children are protected from accessing extremist content online whilst attending any projects run by SLNC.

The organisation recognises that the PREVENT duty does not ask staff to carry out unnecessary intrusions into family life, but, as with any other safeguarding risk, they must take action when they observe behaviour of concern.

### 3.4 Potential signs of radicalisation and extremism

Radicalisation is the process by which people come to support terrorism and extremism, and in some cases, to then participate in terrorist activities and/or groups. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs, as well as calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy 2019 <https://www.gov.uk/government/publications/prevent-duty-guidance/revise-prevent-dutyguidance-for-england-and-wales> )

#### Risk indicators

The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest a young person, or their family may be vulnerable or involved with extremism:

#### Vulnerability

- Identity crisis - distance from cultural/religious heritage and uncomfortable with their place in the society around them
- Personal crisis - family tensions; sense of isolation; adolescence; low self esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal circumstances - migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet aspirations - perceptions of injustice; feeling of failure; rejection of civic life
- Criminality - Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

#### Access to extremist influences

- Reason to believe that the young person associates with those known to be involved in extremism
- Possession or distribution of extremist literature/other media material likely to incite racial/religious hatred or acts of violence
- Use of closed network groups via electronic media for the purpose of extremist activity.

### Experiences, Behaviours and Influences

- Experience of peer, social, family or faith group rejection
- International events in areas of conflict and civil unrest had a personal impact on the young person resulting in a noticeable change in behaviour
- Verbal or written support of terrorist attacks
- First-hand experience of racial or religious hate crime
- Extended periods of travel to international locations known to be associated with extremism
- Evidence of fraudulent identity/use of documents to support this
- Experience of disadvantage, discrimination or social exclusion
- History of criminal activity
- Pending a decision on their immigration/national status.

### More critical risk factors include:

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance/behaviour.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist/radical ideology. As with managing other safeguarding risks, all staff will be vigilant to changes in behaviour of children and young people which could indicate that they may be in need of help or protection.

It is commonly recognised that children at risk of radicalisation may display **changes in behaviour**, show different signs, or seek to hide their views. Staff are advised to use their professional judgement in identifying children who might be at risk of radicalisation and always act proportionately and seek support if they are concerned.

There is no limit to the signs that you might notice – every child is different. However, some of the indicators staff should look out for include:

- Becoming increasingly argumentative.
- Refusing to listen to different points of view.
- Being unwilling to engage with children who are different.
- Becoming abusive to children who are different.
- Embracing conspiracy theories.
- Feeling persecuted.
- Changing friends and appearance.
- Distancing themselves from old friends.
- No longer doing things they used to enjoy.
- Converting to a new religion.
- Being secretive and reluctant to discuss their whereabouts.
- Being sympathetic to extremist ideologies and groups.

- Online, changing their identity, having more than one online identity, spending a lot of time online or on the phone, accessing extremist online content, and joining or trying to join an extremist organisation.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most children or young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation. For example, they may address mental health, relationships, or drug/alcohol issues. For further information - Act on Counter Terrorism Early <https://actearly.uk/>

### **3.5 Referral and intervention process**

Any identified concerns resulting from observed behaviour or reported conversations which suggest that a young person supports terrorism and/or extremism **MUST** be reported to one of the named DSL.

Where a young person is thought to be in need or there is a risk of significant harm which requires investigation then a referral to Children's Social Care should be made in line with the organisation's Safeguarding Policy (even though parental consent may be withheld). However, it should be recognised that concerns of this nature related to violent extremism are most likely to require a police investigation. Therefore, as part of the referral process, the designated professional will also raise an electronic referral to Channel (0800 011 3764).

#### Channel referral process

Some concerns which are identified may have a security dimension to them. For this reason, it is important that liaison with the police forms an early part of all investigations. Local Police will carry out an initial assessment and, if appropriate, set up a multi-agency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, other ways to provide appropriate and targeted support will be considered for the young person.

## 4. Understanding and Recognising Signs of Abuse and Neglect

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children. In many cases, multiple issues of abuse will overlap.

**4.1 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.

**4.2 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 also 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may also involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**4.3 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse can be perpetrated by men, women, or other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) and set out separately in this policy.

**4.4 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 - for example, 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 caregivers);
- Ensure access to appropriate medical care or treatment.

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

**Know the 4 types of child abuse**

**PHYSICAL ABUSE**  
Deliberately physically hurting a child.

**EMOTIONAL ABUSE**  
Causing a child ongoing emotional harm.

**SEXUAL ABUSE**  
Any sexual activity with a child.

**NEGLECT**  
Continually failing to meet a child's basic needs.

**Spot the signs of child abuse.**

**A**PPPEARANCE  
**B**EHAVIOUR  
**C**OMMUNICATION

**SPOTTING THE SIGNS OF CHILD ABUSE**

To help protect a child look out for changes in their **Appearance, Behaviour and Communication (A,B,C).**

Children who are being abused can find it difficult to open up about their experiences. Their silence doesn't mean abuse isn't happening.

**IF YOU THINK IT, REPORT IT.**

To find out how visit [gov.uk/tacklechildabuse](http://gov.uk/tacklechildabuse)

TOGETHER WE CAN TACKLE CHILD ABUSE  
Department for Education

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Posters and Infographics available from DfE and [gov.uk/tacklechildabuse](http://gov.uk/tacklechildabuse)

## 5. Specific safeguarding concerns

All staff at SLNC are aware of safeguarding issues that can put children at increased risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sharing nudes or semi-nudes (also known as sexting or youth-produced sexual imagery) can put children at an increased risk of danger.

### 5.1 Warning signs of exploitation

One of the main signs of abuse or exploitation is when a child goes missing from education, particularly repeatedly. This can be a vital warning sign of a range of safeguarding concerns, but in particular, exploitation - including criminal exploitation and county lines and/or sexual exploitation. Although our organisation is not OFSTED regulated, we do host school visits and work experience students from partner organisations through the Saffron Acres project, for example. If a child does not attend a session, or is late to a session, it must be reported to the designated contact at the partner organisation within the same school day.

Going missing from education can also indicate mental health problems, risk of substance misuse, risk of travelling to conflict zones, risk of female genital mutilation, or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to prevent the risks of a child going missing in future. All staff should be aware of all partner organisation's Unauthorised Absence and Children Missing from Education procedures. These can be found in the service agreement between SLNC (including the project it runs, such as Saffron Acres) and the partner organisation (such as LEBC, local college, NCS programmes etc).

#### 5.1.1 About Child exploitation

All staff should be aware that child criminal exploitation (CCE) – including county lines and child sexual exploitation (CSE) can involve both boys and girls - though boys and girls can be exploited using different methods and may present differently. As with other types of abuse, there is an increasing risk of exploitation taking place or beginning through threats posed online.

Staff should also be aware:

- That children who have been exploited in this way are victims themselves – and that this is sometimes not recognised by professionals.
- That CCE can lead to CSE for both boys and girls.
- Children can be moved from place to place in order to exploit them (trafficked).
- Children who have been involved in this type of abuse may need extra support to stay in education.

### 5.1.2 Child criminal exploitation (CCE)

Child criminal exploitation is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Children can be moved from area to area – this is known as trafficking. Involvement in this type of abuse can be as a direct result of threats of serious violence to the young person or their family.

The victim can be exploited even when the activity appears to be consensual. Further, it does not always involve physical contact but can be facilitated and/or happen exclusively online. Examples of CCE include: young people may be forced to work in cannabis factories, coerced into moving drugs, money, or weapons including across the country (county lines), forced to shoplift, pickpocket, or steal vehicles, or forced into violent crime or making threats to other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Regularly missing school or education.
- Not taking part in education.
- Being involved in serious violence, carrying weapons, or vehicle crime.

Indicators for children who might be being exploited through county lines activity specifically are those who:

- Go missing and are subsequently found in areas away from their home.
- Have been the victim or perpetrator of serious violence (e.g. knife crime).
- Are involved in receiving requests for drugs via a phone line, moving drugs, and handing over and collecting money for drugs.
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Are found in accommodation that they have no connection with, often called a 'trap house' or somewhere that is being 'cuckooed', or a hotel room where there is drug activity.
- Owe a 'debt bond' to their exploiters.
- Have their bank accounts used to facilitate drug dealing.

### 5.1.3 Serious violence and violent crime

Some children may be at risk from or drawn into serious violent crime. All staff need to be aware of the indicators that this may be happening to a child. These may include:

- Increased absence from school visits / project work / work experience sessions etc.
- A change in friendships or relationships with older individuals or groups.
- A significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs, and may be at risk of criminal exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as:

- Being male.
- Having been frequently absent or permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

All staff should be aware of the associated risks and understand the measures in place to manage these.

Staff who are concerned about any of these issues should, as with any other concern, speak to the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate. It may be that, if the concern is raised at an early stage, the child can be supported through the Early Help process.

### 5.1.4 Child sexual exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator, and/or
- by threats of serious violence to the victims and their family.

It can be a one-off or part of a series of acts over time, and can be opportunistic or organised abuse. It can be perpetrated by men or women, and peers can be involved. Victims of this type of abuse can be male or female. The victim may be subject to criminal exploitation and may be trafficked for the purpose of exploitation. The victim may have been sexually exploited even if the activity appears consensual.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge - for example, through others making copies of recordings or images.

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

**Signs include:**

- Underage sexual activity.
- Inappropriate or risky sexual or sexualised behaviour.
- Repeated sexually transmitted infections.
- In girls, repeated pregnancy, abortions, and miscarriage.
- Receiving unexplained or unaffordable gifts or gifts from unknown sources.
- Going to hotels or other unusual locations to meet friends.
- Moving around the country, appearing in new towns or cities, not knowing where they are.
- Getting in/out of different cars driven by unknown adults.
- Having older boyfriends or girlfriends, or hanging out with groups of older people.
- Being involved in abusive relationships, intimidated, and fearful of certain people or situations.
- Associating with other young people involved in sexual exploitation.
- Recruiting other young people to exploitative situations.
- Truancy, exclusion, disengagement with school, opting out of education altogether.
- Unexplained changes in appearance, behaviour, or personality (chaotic, aggressive, sexual, etc.).
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- Drug or alcohol misuse.
- Getting involved in crime.
- Police involvement, police records.
- Being involved in gangs, gang fights, gang membership.
- Injuries from physical assault, physical restraint, sexual assault.

## 5.2 Honour-Based Child Abuse

Honour-based abuse is a crime or incident committed to protect or defend the 'honour' of a family or community. If your family or community think you've shamed or embarrassed them by behaving in a certain way, they may punish you for breaking their 'honour' code. People who carry out honour-based abuse are often close family members but also extended family or community members. Honour Based Abuse is often thought of as a 'cultural', 'traditional' or 'religious' problem. It can affect people of all ages, but often begins early in the family home. It can lead to a deeply embedded form of coercive control, built on expectations about acceptable and unacceptable behaviours. Control is often established without overt violence against the victim. For example, family members may threaten to kill themselves or ostracise the victim. Perpetrators are often partners or ex-partners, or family members. Most victims experience abuse from multiple perpetrators, including parents and siblings. There isn't one specific crime of honour-based abuse. It can involve a range of crimes and behaviours. Honour-based abuse in children can include forced marriage, child brides, rape, virginity testing, female genital mutilation, coercive control, and any other form of abuse and neglect.

### **The concept of 'honour'**

For some communities, the concept of 'honour' is prized above the safety and wellbeing of individuals. To compromise a family's 'honour' is to bring dishonour and shame – which can have severe consequences. This is sometimes used to justify emotional abuse, physical abuse, disownment and in some cases even murder.

### **Which communities are affected?**

Honour Based Abuse is more prevalent within communities from South Asia, the Middle East, and North and East Africa. Reports come from Muslim, Sikh, Hindu, Orthodox Jewish and occasionally traveller communities. It is not determined by gender – both perpetrators and victims can be male or female. However, cultural tradition does not mean Honour Based Abuse is acceptable. Children who are exposed to, or grow up in, a family or community where honour based abuse occurs are at serious risk of remaining a victim as an adult. All forms of Domestic Abuse are illegal.

### **Definitions**

There is currently no statutory definition of Honour Based Abuse in England and Wales, but a common definition has been adopted across government and criminal justice agencies: 'A crime or incident which has, or may have been, committed to protect or defend the honour of the family and / or community'.

### 5.2.1 Honour-based abuse: Forced Marriage (FM)

This is an entirely separate issue from an arranged marriage. Forced Marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic abuse. It is also a criminal offence to force a person to marry in England and Wales.

Young men and women can be at risk in affected ethnic groups. Evidence shows that the issue of forced marriage affects certain sectors of communities, typically girls in the age range of 14 – 16 years old originating from Pakistan, India, and Bangladesh (approx. 60% of the cases) together with a percentage of cases of children originating from the Middle-East and African countries. However, it can affect boys and children with SEND.

A signal of FM is the removal of the child from school and lengthy absence which is often unexplained. Other indicators may be detected by changes in adolescent behaviours. Whistleblowing may come from younger siblings. Any member of staff at SLNC with any concerns should report this immediately to the DSL, who should raise the concern with the Local Police Safeguarding Unit by email or phone. Never attempt to intervene directly as an organisation or through a third party. Whilst the onus of the investigation for criminal offences will remain with the Police, the DSL should co-operate and liaise with the relevant agencies in line with current child protection responsibilities.

### 5.2.2 Honour-based abuse: Female Genital Mutilation (FGM)

If, during the course of their work, a member of staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18 years, then they must report it to the police. All staff at SLNC will recognise this responsibility.

#### The 'One Chance' rule.

As with Forced Marriage, there is the 'One Chance' rule regarding FGM. This refers to staff potentially only having one chance to speak to a potential victim and thus may only have one chance to save a life. It is essential that the organisation takes action without delay.

#### What is FGM?

Female genital mutilation involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

#### Why is it carried out?

It is often based on a belief that FGM:

- Brings status/respect to the girl – social acceptance for marriage.
- Is part of being a woman/rite of passage.
- Upholds family honour.
- Fulfils a religious requirement.
- Helps girls be clean/hygienic.
- Is cosmetically desirable.
- Makes childbirth easier – this is a mistaken belief.

### **FGM is a criminal offence.**

All staff at SLNC will be made aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM. All staff have responsibility to report FGM if they discover, in the course of their professional duties what appears to be FGM, to the police. The DSL, who will offer support, should also be informed immediately.

Circumstances and occurrences that may point to FGM happening include:

- The child talking about getting ready for a special ceremony.
- The child and their family taking a long trip abroad.
- The child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghani, Kurdistan, Indonesia, and Pakistan).
- Knowledge that the child's sibling has undergone FGM.
- The child talking about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from involvement with project work and other activities.
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs.
- Mentioning something somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinal tract infections.
- Disclosure of abuse.

Further guidance and information are available from: NSPCC FGM Helpline (24hr) Tel: 0800 028 3550 Email: [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

### 5.3 Peer-on-peer abuse

All staff at SLNC must be aware that children can abuse other children (referred to as peer-on-peer abuse). This is most likely to include, but may not be limited to:

- Bullying, including cyberbullying, prejudiced-based, and discriminatory bullying.
- Physical abuse, such as hitting, biting, kicking, shaking, hair-pulling, or otherwise causing physical harm.
- Sexual violence, such as rape, assault by penetration, and sexual assault.
- Sexual harassment and online sexual harassment, such as that which takes place on social media or chat rooms, which may be stand-alone or part of a broader pattern of abuse. Examples include: sexual comments, remarks, and jokes.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery).
- Upskirting, which is a form of abuse that has been high on school and court agendas for a number of years and is a criminal offence in its own right under the Voyeurism (Offences) Act 2019. Upskirting occurs when someone takes a picture under a person's clothing, with or without underwear, without permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm. It is a common aspect of peer-on-peer abuse and can happen to any gender.
- Initiation/hazing type violence and rituals. This could include activities involving harassment, abuse, or humiliation, used as a way of initiating a person into a group. It may also include an online element.

#### 5.3.1 Identifying peer-on-peer abuse & understanding consent

Every child will react differently, but some recognised indicators of peer-on-peer abuse are:

- Bleeding, bruising, sexually transmitted infections (STIs), or pregnancy.
- Becoming withdrawn or displaying other behaviour changes.
- Being fearful of being in school or online.
- Missing education.
- Self-harming.
- Displaying behaviours beyond their stage of development.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16;
- Sexual intercourse without consent is rape.

Most issues of peer-on-peer abuse can be dealt with through the visiting / arranging organisation or school's behaviour policy, but where the behaviour raises a safeguarding concern, it falls within the scope of this child protection and safeguarding children policy.

The organisation recognises that it is important to educate children to understand:

- What constitutes appropriate behaviour – including online.
- Issues around consent.
- Issues around discrimination and misogyny.
- Where the criminal law fits into this type of behaviour.

The organisation recognises that peer-on-peer abuse is a problem and is happening, even when the issues are not reported. This sort of abuse has a serious impact on those who are victims, in terms of self esteem and relationships but also educational outcomes. Consequently, SLNC has put in place procedures and expectations based on the following:

- This type of abuse can take place in and outside of the organisation and the projects it runs, and online. It can affect any age of child but is predominantly an issue for secondary and college age groups.
- Staff must maintain an attitude of "it could happen here".
- Downplaying inappropriate behaviour can lead to a culture of unacceptable behaviour and can lead ultimately to normalisation of abuse. It will not be tolerated – we have a zero-tolerance approach to this issue.
- Staff must intervene in "inappropriate" behaviour, which can prevent it from escalating to abusive or violent behaviour.
- It is crucial to have a zero-tolerance approach to sexual violence and sexual harassment, and an important part in this is not tolerating or laughing off sexual banter or jokes.
- Victims of this type of abuse are likely to be distressed and there is a likelihood of it affecting their educational attainment – this is more likely where the alleged perpetrators attend the same group, sessions or are from the same school or the same visiting organisation.
- Girls are more likely to be victims and boys are more likely perpetrators – however, any report or suspicion should be taken seriously.
- The abuse can be perpetrated by an individual or a group.
- Sexual violence can happen in intimate relationships between peers.
- There can be links between this type of abuse and sexual and criminal exploitation.
- Some children may face additional barriers in reporting because of vulnerabilities, disabilities, sex, ethnicity, and sexual orientation.
- Procedures that we put in place to deal with issues of sexual violence or harassment must be clear, easily accessible, and well-promoted, so that children feel confident in reporting abuse.
- Staff must be aware of behaviour in children that might indicate there is an issue with sexual harassment or violence and act immediately.
- Responding to each incident well will build a trust in the systems so that victims will feel able to come forward in future.

- It is extremely important to listen and react to the child's report (listening well and not asking leading questions).
- Whilst victims' wishes and feelings are of paramount importance, an organisation should not forget to balance this with its duty to protect other children.
- Where a report is found to be malicious or unfounded, the organisation should consider what the most appropriate step should be – it might be that the person has been abused by someone else or the allegation might be a cry for help. If the report was deliberately made up, the organisation will consider using disciplinary processes.
- All staff should understand the consequences of sexual violence and be aware of all of the available resources for victims but also for perpetrators – many of which are linked at the end of the section.
- It is important to look for patterns in all reports and identify any broader issues that need to be addressed.

## 5.4 Sharing nude/semi-nude images (Sexting)

### Your responsibilities when responding to an incident

If you are made aware of an incident involving the sharing of nude or semi-nude images (also known as sexting and 'youth-produced sexual imagery'), you must report it to the DSL immediately.

#### You must not:

- View, download, or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the pupil to delete it.
- Ask the child(ren) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the child(ren) it involves, or their, or other, parents and/or carers.
- Say or do anything to blame or shame any child involved.

#### You should:

- Explain that you need to report the incident,
- Reassure the child(ren) that they will receive support and help from the DSL.

Further information can be found here: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

## 5.5 Mental Health

All staff must be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children who attend frequently day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, speaking to the designated safeguarding lead or a deputy. This must be done in partnership with the referral agency.

*Children should be made aware of this information so that they are aware of the processes the organisation will follow in the event of an incident.*

## 5.6 Children missing education

All children, regardless of their circumstances or background, are entitled to full-time education that is suitable to their age, ability, aptitude, and any special educational needs and disabilities.

Any absences of a child from a session or programme must be recorded. If the child was due to attend as part of a visiting group who have provided their own staff, SLNC staff must make sure the visiting group on-site staff are made aware immediately, and their protocols followed as laid out in their site user agreement. The SLNC DSL must also be notified to increase the likelihood of any patterns of behaviour to be recognised and brought to the attention of the DSL of the visiting group, particularly for groups who attend regularly. If a child is due to attend without third party staff on-site (such as an LEBC arranged work placement), the arranging third party protocols must be followed as agreed in their service level agreement. In these cases, the protocol often requires SLNC staff to notify the third-party organisation of any lateness or absence within 30 minutes of non-attendance, but it does vary between organisations. In other cases, agreements may be in place for a responsible adult to be notified within a certain timeframe. **SLNC staff must familiarise themselves with the appropriate protocols and third party agreements that are in place for each child visiting the project in any capacity.**

SLNC operates a strong attendance tracking system that is overseen by a member of the leadership team for each specific project. The tracking and use of effective attendance management strategies enables the organisation to ensure each day that every child is accounted for.

The organisation takes a range of actions to tackle Persistent Absentees and completes reports on children who are persistently absent from education. The organisation recognises that some children seeking leave of absence are vulnerable to risk of abuse, neglect, exploitation or travelling to conflict zones, or at risk of FGM or Forced Marriage. Staff must look out for these triggers, and the organisation works in partnership with the Local Authority to ensure localised risks are particularly taken note of and shared with all staff. Staff who have pastoral responsibility undergo training on attendance and safeguarding issues on an annual basis. Where this is identified, staff should alert the DSL and any visiting group leader. The DSL will, as soon as a concern is established, alert the Local Authority.

As a matter of course: child absence must be followed up on a daily basis – this must be a priority. The organisation requires all visiting groups to hold more than one contact number for each child. Unless circumstances indicate that a student is at risk and immediate action is necessary, the Local Authority will be informed of every child who has a continuous period of unexplained absence of three days or more.

SLNC project staff must ensure an attendance record is kept up to date and the visiting school and/or Local Authority is appropriately informed of all children who are removed from a programme or session when they:

- Have been taken out of a school-arranged programme by their parents,
- Have ceased to attend the project
- Have been permanently excluded from an SLNC run programme or project
- Have left a session early for any reason (e.g. a parent has picked a child up due to the child becoming ill during the session)

No child will be removed or excluded, or their name deleted, from an SLNC programme until all safeguarding checks have been completed or the whereabouts of a child have been established.

## **5.7. Domestic abuse**

Domestic abuse (often referred to as domestic violence) refers to any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. It can occur in intimate relationships between older children.

Exposure to domestic abuse can have a serious, long lasting emotional and psychological impact on children.

### 5.7.1 Operation Encompass

This initiative helps police and places of education work together to provide emotional and practical help to children who have been involved in domestic abuse. When the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) before the child or children arrive at school the following day. This ensures that the school has up to date and relevant information about the child's circumstances and can enable support to be given to the child according to their needs. DSLs at all SLNC partner schools and organisations should endeavour to alert relevant SLNC staff as soon as possible where this is appropriate, as set out in the service level agreement.

## 5.8. Online safety

SLNC's online safety policy and other connected policies and agreements can be found at Saffron Resource Centre or electronically upon request. These are updated annually and as required. All staff must understand that threats to children from online activity are increasingly a factor in many types of abuse. All staff should be aware that these risks also evolve and change.

All staff are trained in online safety in conjunction with their safeguarding training. As these threats are dynamic and evolve, the organisation keeps staff awareness up-to-date through regular bulletins and training.

Our online safety awareness is based on the "Content, Contact, Conduct" questioning methodology. This is expanded upon in our Online Safety policies and procedures.

### 5.8.1 Areas of Particular Risk

The organisation does not specifically facilitate the access to online information with the following exceptions which have their own online safety risk assessments, policies and procedures which must be followed;

- Adults, and on a case-by-case circumstance some young people under 18, may access specific information via desktop computer at Saffron Resource Centre on request by booking a computer for a disclosed reason (e.g. to access job centre information). These computers are password protected, and have limited website use restricted to use of certain websites (e.g. job centre website etc).
- A member of SLNC staff may take part in an online programme where a child may be present. An example of this situation would include where Saffron Acres staff have agreed to include a pupil in a virtual site visit by allowing a member of their school staff to "live stream" the session back to the school for those not well enough to attend in person, or where a school teacher has requested and will be present for an online Zoom or Teams meeting during one of their "Ask a gardening expert" forums for their pupils as part of a lesson.

- Any person, including children, may access SLNC and / or their staff online via the organisation's website, or via any online social media provided by a project run by SLNC (such as Saffron Acres' facebook page and volunteer support group). There is a separate Social Media policy which sets out guidelines and protocols for both SLNC staff, and a linked document for volunteers and service users which must be referred to in conjunction with this safeguarding policy.
- Any person, including children, may contact SLNC staff through an online contact form via the organisation's website, and via email. Virtual interactions of this kind carry their own safeguarding risks, and all staff must be aware that safeguarding concerns can and may occur or be raised through misuse of this media. SLNC's Online Policy and Staff Code of Conduct must be referred to in conjunction with this safeguarding policy.

The organisation's approach to online safety is based on the four key categories of risk as identified by KCSIE 2021:

- **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial, or other purposes.
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images, and online bullying.
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing, and/or financial scams.

Being safe online is essential for children. It empowers them to keep themselves safe. Online safety is embedded at every occasion through a variety of teaching and learning opportunities. Where appropriate, we teach children;

- How to recognise threats online.
- How to recognise inappropriate content and how to behave online including misogynistic content; self-harm, sexual discrimination, cyberbullying, peer-on-peer abuse, the dark web, fake news, false advertising, and phishing.
- How to keep personal data safe.
- How to report issues of concern both for themselves and others.

SLNC has procedures in place to address issues posed by online threats, including:

- Online Safety Policy and related policies including Acceptable Use Agreements and Mobile Device Policy; Social Media Policy; Bring Your Own Device Policy, which must be read alongside this document. Staff are additionally encouraged to familiarise themselves with the latest DfE guidance 'Teaching online safety in schools' as a source of best practice in such matters.
- Robust and regular information for everyone in the organisation about how to maintain a safe online presence (including service users, staff, and volunteers).

## 5.9. Cybercrime

SLNC recognises that there is a risk to children from being drawn into this type of criminal activity, that can only be committed online (i.e. cyber-enabled activity).

There are three main types of activity:

- Unauthorised access (hacking) - for example, where students access areas of an IT system to change their records.
- Denial of service (booting) - where a network is overrun, or an attempt is made to achieve this.
- Malicious software (malware) - activity which introduces viruses into IT systems (or attempts to).

Staff who have concerns about this should report it to the DSL, who can refer the individual to the Cyber Choices programme. This programme aims to intervene when young people are at risk in this way.

## 5.10 Opportunities to teach safeguarding

SLNC will ensure that children are taught about safeguarding, including online safety at any relevant opportunity. This may include covering relevant topics through learning in general but especially through a directly relevant situation, such as how to contact our team via email. We recognise that a 'one size fits all' approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse, and some SEND children might be needed.

The organisation understands that our responsibility extends to helping children keep themselves safe outside of any project or session they attend, and this includes both online and outside of the physical project gates, where dangers such as child abduction and grooming exist.

## 5.11 Looked after children

All staff in SLNC should have an awareness of any issues around safeguarding looked after children where a visiting school deems it appropriate, as per their service level agreement with our organisation. The leadership team will ensure that staff have the skills, knowledge, and understanding necessary to keep looked after children safe. Staff are aware that looked after children (and those previously looked after) may have extra needs and may need extra support to achieve desired education outcomes.

Staff will be aware of the legal status of a looked after child's care arrangements. Where a child attends the project with a member of visiting group staff, the visiting group will have a designated member of staff with informed on all information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after

him/her. This requirement forms part of the responsibilities of visiting school groups. If a situation occurs where a child does not attend SLNC through a school, LEBC programme or other such recognised organisation, and where SLNC has a direct agreement with guardian, the DSL will take reasonable steps to be made aware of any looked after status of a child attending a programme run by SLNC and will seek and act the guidance of the Local Authority on a case-by-case basis.

### **5.12. Children with a social worker**

We recognise that children with social workers can need extra support. A child's experiences of adversity and trauma last for many years and can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children and will help with any reasonable adjustments individuals may need.

Where we are aware that a child has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child safety, welfare, and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks.
- The provision of pastoral and/or academic support.

### **5.13. Children with special educational needs, disabilities, or health issues**

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood, and injury relate to the child's condition without further exploration.
- The fact that these children being more prone to peer group isolation or bullying (including prejudice based bullying) than other children.
- The fact that these children are at increased risk of abuse and exploitation whether from peers, those who seek to harm children, or criminal gangs.
- The potential for children with SEND or certain medical conditions to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- The organisation therefore looks to address this issue through raising awareness amongst staff, offering tailored pastoral support, and ensuring communication with children in these groups is effective. It may also involve speaking to the school a child attends and supporting a referral to CAMHS, or supporting any such referral.

## 5.14. Homelessness

Being homeless, or being at risk of becoming homeless, presents a real risk to a child's welfare and can pose serious safeguarding and child protection risks.

There is also now a Homelessness Duty imposed through the Homelessness Reduction Act 2017, which places a duty on local authorities to intervene at earlier stages to prevent homelessness in their areas. This extends to all social services functions, including Early Help, and is intended to increase early identification and intervention. Earlier intervention can help prevent children and young people becoming homeless. Where a child is – or is at risk of – becoming homeless and has also been harmed or is at risk of harm, the DSL will also make a referral to children's social care, either in conjunction with a partner organisation responsible for the child (e.g. the school organising a work experience placement), or directly themselves where this is not possible

## 6. Supporting & Relevant Information

### 6.1 Medication & Personal Possessions at Saffron Acres & Saffron Heath

Only medication required should be brought onto site by anyone, including staff, volunteers, service users and other visitors. Saffron Acres staff cannot provide or give medication to a child or young person. The guardian or carer accompanying a child must ensure their necessary medication is stored and used appropriately. Parents or guardians of unaccompanied young people who attend (e.g. as part of work experience) must have an agreed medication plan in place tailored to the needs of each young person and staff must be kept fully informed of any changes to medication.

Due to the nature of the Saffron Acres and Saffron Heath sites, medication needs must be fully discussed with the Volunteer Coordinator or Project Manager, and the relevant support staff informed on the day. Saffron Acres staff will always do our best to accommodate the varying needs of participants, however we cannot be responsible for supervising, prompting or administering medication and personal care.

Careful consideration needs to be made regarding whether lifesaving medication is required to remain upon the individual or carer, and steps taken to ensure this is done appropriately and safely (e.g. an epipen or inhaler), and whether medication needs to be stored in certain conditions (e.g. in a fridge in a locked room). The site is over 12 acres in size and for example walking from the furthestmost part of the project site to the main charity office is a good 15 minute walk over uneven terrain or over a 20 minute walk by main path/road; even walking between the designated Saffron Acres & Saffron Heath site offices can take 10 minutes by foot, so it is an important factor to be planned for. All medication brought onto site and kept on the person/carers or left in a secure dedicated space with the permission of the project manager must be clearly labelled with the child or young person's name and must be taken home when leaving the project at the end of each session. All medication left in the secure designated space must be signed in and out, and may only be placed and removed from the storage by a member of Saffron Acres Staff. Medication must not be kept in the field first aid kits, either in the site offices or the portable kits carried by a designated staff group leader.

If there are any concerns over someone potentially abusing medication, (either theirs or someone else's, prescribed or over the counter), or a carer or guardian inappropriately medicating a child or young person, this must be reported to the Designated Safeguarding Lead immediately.

Concerns could include:

- Medication bottles with someone else's name on
- A guardian describing the need for a different dose to that prescribed on the label
- An individual requesting their medication more frequently than packaging indicates
- Someone missing doses, either intentionally or forgetfully
- Blister packs being tampered with
- Medication looking different to that indicated on the packaging
- Medication is contaminated, dirty, or appears unsafe
- Medication not provided appropriately (e.g. a container that an individual cannot open due to their specific needs)
- Individuals not wanting to take their medication (this could be due to a number of reasons)
- Someone appears to react strangely after taking / not taking their medication, especially if this is dismissed by a carer or guardian (e.g. a carer who doesn't want to take a child in their care to the toilet frequently and giving a reduced dose of a diuretic, or a young person appearing 'sleepy' if a guardian is encouraging overmedication to help their service user become more compliant, for example)
- Someone offering medication to others
- Someone stating they are misusing their medication or someone else's
- Secretive behaviour, changes in attitude and behaviour, and anxiety over their medication

The emergency services must always be contacted in any medical emergency.

Saffron Acres operates a no alcohol or drugs policy.

No such substances are allowed on site, including the consumption or use of substances on site or arriving under the influence of them. If a child appears to be under the influence or actively taking drugs or alcohol, the DSL must be informed immediately and it may be necessary to seek medical advice.

Personal possessions of value must not be brought onto site unless this is unavoidable – in this case it must be discussed with the volunteer coordinator or project manager and a procedure for storage or use agreed in advance.

Any safeguarding concerns over misuse of personal possessions, either by the owner of the property/item or someone else, should be reported to the Designated Safeguarding Lead.

For example;

- Someone inappropriately “borrowing” a service users coat
- Someone not asking to use something belonging to someone else, such as an adapted gardening aid that someone has brought to the project that enables them to participate in an activity
- Someone taking something that doesn't belong to them due to a compulsion, kleptomania, hoarding tendency, or other behaviour
- Someone hiding something that belongs to someone else, either for amusement or with the intent to cause emotional or physical harm
- Someone misusing PPE – e.g. sharing equipment meant for sole use, or reusing single use equipment
- Someone tampering with or carrying out unauthorised adaptations or repairs to any items or equipment
- Someone ‘persuading’ someone else to give them their belongings
- Theft
- Someone using their own belongings inappropriately (e.g. threatening to use an item as a weapon such as a walking stick or throwing an item)
- Someone using a belonging according to its intended use but which is not appropriate for use at the project (e.g. a personal camp stove)
- Weapons (e.g. a pocket knife)
- Possessions that are inappropriate due to insensitive or abusive use of protected characteristics of the Equality Act e.g. a clothing with explicit language or literature with violent pictures etc) or are insensitive to current or historical events either locally or globally, or are in other ways inappropriate (e.g. relating to sexual innuendo or topics that are insulting or deliberately promoting an illegal substance for example)

## 6.2 Confidentiality and record-keeping

Staff at SLNC have a professional responsibility to share relevant information about the protection of children with the DSL and potentially external investigating agencies, where possible, under the guidance of the DSL.

If a child confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the student sensitively that he/she has a responsibility to refer the matter to the DSL.

Accurate, signed, and dated written notes must be kept of all safeguarding and related incidents and child protection concerns relating to individual children. If a member of staff has a child protection concern, they should inform the DSL or Deputy DSL as soon as possible. These will be kept on the child's child protection file.

Arrangement for child protection documentations must comply with the organisation's Data Protection Policy together with data protection law and regulation applicable at the time. The DSL will ensure that all child protection records

are held separately from other child records. Child protection files and documents will be stored securely, by encryption and/or password protecting electronic files. All staff are trained to use the systems, which are access controlled. All paper records are stored in a locked cabinet with restricted access. Information from child protection files will only be shared with relevant staff when it is necessary to do so (following the government's seven golden rules for data sharing) and in a manner that is consistent with data protection law.

If the organisation receives a request for direct access to, or copies of, documentation held on a child protection file, the DSL will be informed and a decision taken on the appropriate way forward in accordance with the Data Protection Policy. It may be that the organisation's Data Protection Officer will be consulted or further legal advice sought.

In the event of a child being dealt with under the organisation's child protection procedures, the organisation will:

- Inform their school (or the third party organisation arranging their placement such as LEBC) and, where appropriate, the Local Authority.
- Ensure that, where a victim or perpetrator transfers between projects within the organisation, the appropriate SLNC staff are informed and the child's school or organising third party is made aware of potential risks, protective factors, and any ongoing support the child is receiving.

Any external individual or organisation contracted by the organisation to work with children (for example, an activity leader) must report any child protection incidents or disclosures from children to the DSL at the earliest opportunity. Such individuals, organisations or bodies will, as part of their contractual arrangements with SLNC, be required to work in accordance with SLNC's child protection and safeguarding policy. The organisation has in place data sharing agreements and complies with all relevant data sharing protocols.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

Where the organisation contracts with others to run activities on the premises or grounds, appropriate safeguarding arrangements/expectations will form part of the contract.

### **6.3 Equal opportunities**

SLNC, its Management Committee and Board of Trustees must take into account the Equality, Diversity, and Values Policy when discharging their duties under this policy.

## 6.4 Health and safety

The organisation has a robust, up-to-date Health and Safety Policy and Procedure to ensure the safety of children, and all other visitors and staff at any project run by SLNC. The designated Project Manager on each project is responsible for identifying and managing health and safety through the use of risk assessments *for their specific project*. These are carried out:

- On an annual basis (or sooner if needed).
- For any new activity, hazard or way of working.
- For all individuals, such as those on work experience placements.
- When a child returns following an exclusion due to risky or violent behaviour, in conjunction with their school or organising third party (such as LEBC or NCS).
- When there are any changes to the premises or practices.
- Following a serious accident in relation to staff and/or volunteers, visitors, or children.
- When there is a high-level risk associated with contact with parents.
- To maintain effective security of the premises including protection from intruders, trespassers, and/or criminal damage.

The organisation takes a risk-based approach to visitors and contractors on site. The normal procedure for visitors and contractors not working directly with children is that they will:

- Report to the organisation's head office main reception on arrival, which has a key-coded entry beyond the reception area; or alternatively if the contractor or visitor is attending a specific satellite project site (such as Saffron Acres or Saffron Heath) which all have secure entrances, they need to notify the on-site Project Manager of their arrival (usually by telephone call to the on-call site mobile) so they can be let in and escorted whilst on-site.
- Be supervised by a designated member of staff at all times whilst on site.
- Provide proof of identity.
- Wear a name badge at all times.
- Be made aware of the arrangements for safeguarding and health and safety.
- Comply with the relevant vetting checks specified through by SLNC.

## 6.5 Ofsted inspections

SLNC and the projects it runs are not inspected by Ofsted. However, the organisation adheres to many of their guidance as a form of best practice and encourages all staff to be aware of Ofsted regulations. You can find guidance documents at the following link:

<https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills>

## 6.6 Monitoring and review of this policy

The Designated Safeguarding Lead (DSL) at SLNC will monitor the working of this policy and will report as required to the Management Chair. It will be reviewed as required and annually.

# Appendix 1

## Guidance for all staff and volunteers on dealing with disclosure, including work experience students

### A. If you are a child or young person and have a safeguarding concern about yourself

- Try to remain calm.
- Make sure you are safe. This might mean; physically going to a different room or location as soon as it is safe to do so.
- Speak to a member of staff as soon as it is safe for you to do so.
- You can also speak to the NSPCC 0808 800 5000 who can help guide you through what to do next.
- **If you are in danger ring 999**

### B. Dealing with disclosures of abuse – Action at Point of Disclosure

- Always listen carefully and quietly. Do not press for any evidence at all.
- Closely observe their presentation, appearance and behaviour, but do not comment on it
- Remain calm and reassuring. Do not dismiss the disclosure and do not show distress or concern.
- Do not refute the allegation.
- Show that you care through open and reassuring facial expressions and body language.
- Do not interrogate or ask leading questions (it could later undermine a case).
- Ensure you take a written verbatim account of the child's disclosure as soon as possible
- Staff should be aware that written accounts could become part of a statutory assessment or criminal investigation.
- Where there is an online element, the key consideration is for staff not to view or forward illegal images of a child. Where viewing images is unavoidable, the following link provides advice on how to respond:  
<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-foreducation-settings-working-with-children-and-young-people>

### C. Dealing with disclosures of abuse – Immediate Response Following Disclosure

At this point, staff should take the following steps:

- Explain to the child that the disclosure must be reported – emphasise your trust in them. Explain that you will have to tell someone else who will help them stop this happening.
- Do not promise to keep the allegation secret or that 'everything will be alright.'
- Verbally reassure (or by similar communication method where necessary) the child by telling them that they have done the right thing in telling you. Do not offer physical reassurance, but do tell them that you believe them.
- Never make the child feel that they are wrong for bringing issues to your attention.
- Do not admonish in any way e.g. 'I wish you had told me sooner.'

- Inform the DSL initially verbally.
- Under no circumstances discuss the matter with any other person. If the allegations prove to be untrue, any such discussion would be deemed defamatory. Information to staff is on a 'need to know' basis at the discretion of the DSL.
- If the child agrees, and it is appropriate, take them with you to the DSL.
- With the DSL, prepare a detailed report itemising:
  - The information revealed by the child. It should not contain any opinion or judgements whatsoever.
  - Remember the exact words used if you can. Record anything evidence-based.
  - Actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported, and follow-up action taken within the organisation.
- Date and sign any written record of events and action taken and keep confidential and secure.
- You must keep, in absolute confidence, a copy of the report, as will the DSL.
- The DSL keeps Child Protection records centrally and securely and are not kept in the child's file.
- All staff are under a duty to report all suspicions of abuse to the DSL (or, as per the instructions in the main policy document, to the Deputy DSL where the DSL is not available.)
- The DSL is responsible for passing on these concerns to children's services.
- Accurate records are essential in the event of further investigations
- Any referral must include as much relevant information as possible.
- Where possible, is good practice to inform the parent/carer of the disclosure and referral, however, do not inform the person named as the abuser if you feel this might place the child at risk of further harm.
- Do not discuss concerns/allegations/disclosures with other people. The child/young person and family have a right to confidentiality with only people who 'need to know' sharing the information.

#### **D. If you see or hear something that is concerning:**

- Don't ignore it or assume that it is someone else's responsibility to report it.
- Seek advice immediately from the DSL.
- Don't feel silly – if it worries you, someone else needs to know.
- If it is something related to safeguarding, but not a child whose safety is immediately at risk, you must still inform the DSL in person and follow up with a one-line email notifying the DSL that there is a safeguarding concern.
- If it is related to a child being at risk, see the DSL or Deputy DSL immediately and definitely before the child goes home that day where possible.
- All staff may raise concerns directly with Children's Services if they feel an incident is not being dealt with appropriately or they are unable to locate relevant staff.
- Concerns about adults that affect children, (as well as all other safeguarding areas of concerns) should be made directly to the DSL.
- Sometimes you may just feel concerned about a child but do not know whether to share your concerns or not. In this situation you should always raise your concerns with your DSL, who will help you decide what to do.

## **E. What happens next?**

It is not the responsibility of the DSL or other staff to investigate suspected abuse. The responsibility for investigating allegations of abuse, whether they result from the disclosure of a child or young person or the concerns of an adult, lies with Children's Social Care and the Police. It is normally the responsibility of your DSL to make a referral to these agencies but if you judge the situation to be urgent and/or you require immediate advice you can report your concerns directly.

The Social Care team will advise you if or when to inform the child's parents or carers about any concerns. If they decide to pursue a child protection investigation you must:

- Work closely and collaboratively with all professionals involved in the investigation, in order to keep the child safe
- Attend a child protection conference, if you are invited, where you will be asked to provide information about your involvement with the child. This is one of the reasons why it is important to keep dated records of your concerns
- Attend any subsequent child protection conferences

## Appendix 2

### Other procedures in respect of Child Abuse where a member of SLNC staff may be asked to provide information

#### A. Early Help

If a child or family would benefit from support from multiple services then social care may request that an Early Help Assessment (EHA) is carried out. The assessment aims to identify what kind of support the child or family needs in order to resolve the problem. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. The assessment is also a continuous process, not a one-off event, and is regularly reviewed to ensure the child continues to receive the services that they need. Any staff member who works with the child may be required to provide further information about the child and family, in person, over a telephone conference, or both, and it can take place at any time from the moment of referral right through the assessment process.

#### B. Section 47 enquiries

Section 47 enquiries are necessary when there is a need to safeguard and promote the welfare of a child because they are suspected of suffering significant harm. Section 47 of the Children's Act imposes a duty on local authorities to investigate when there is a child in their area who is:

- Subject to an emergency protection order;
- In police protection; or, Where the local authority has reasonable cause to suspect that a child who lives, or is found, in their area is suffering, or is likely to suffer, significant harm.

Under the Act, "the authority shall make, or cause to be made, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare".

The enquiry is a dynamic process but usually involves:

- Speaking to the child who is the subject of concern to ascertain their wishes and feelings.
- Interviewing parents or carers and determining wider factors that may impact on the child and family.
- Systematically gathering information about the child's and family's history.
- Analysing the findings of the assessment.
- Undertaking appropriate medical tests, examinations, or observations to determine how the child's health or development may be being impaired.

Local authority social workers are responsible for deciding what action to take and how to proceed following Section 47 enquiries. Where concerns of significant harm are substantiated and the child is believed to be suffering, or likely to suffer, significant harm, social care will:

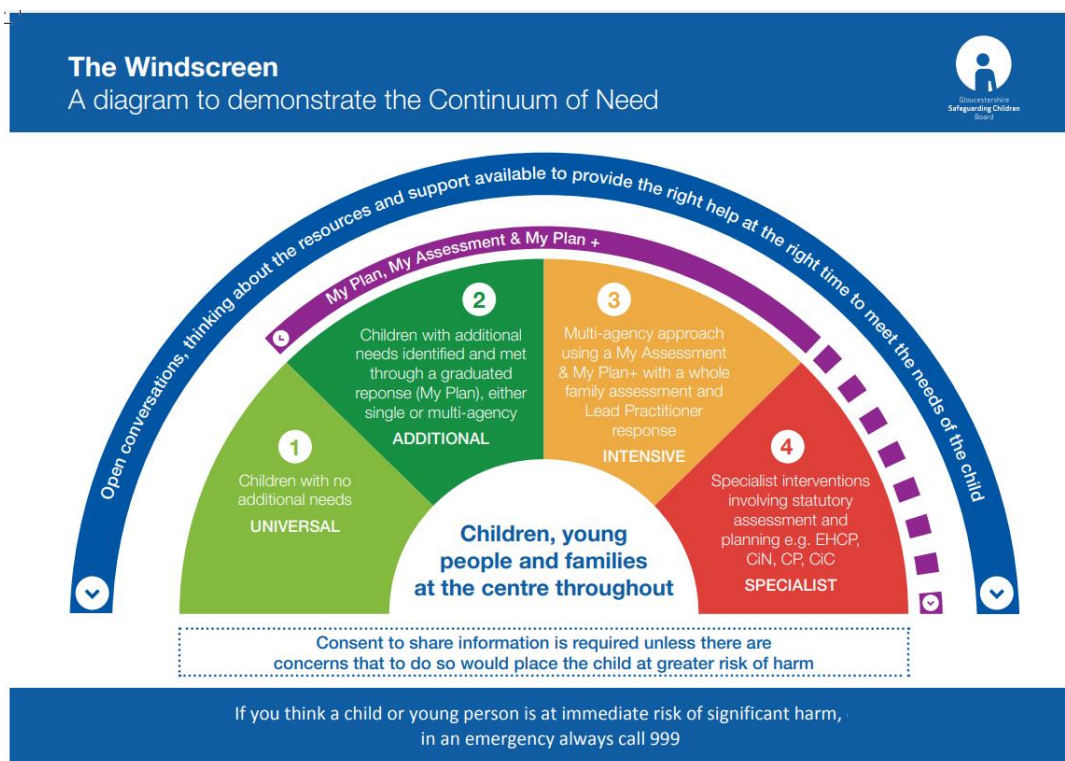
- Convene an initial Child Protection Conference within 15 working days of the strategy discussion.
- Consider whether any professionals with specialist knowledge should be invited to participate.
- Help prepare the child and parents if needed.

Social care may ask professionals who have contact with the child to contribute further information or attend the Child Protection Conference to help with the decision making. These meetings are chaired by Independent Reviewing Officers who are employed by the local authority but act independently. The meetings bring together professionals, gather evidence, and determine actions that are required to safeguard the child. If it is found that the concerns of significant harm are not substantiated, then social care should:

- Discuss the case with the child, their parents, or the professionals involved.
- Determine whether support from services is needed.
- Consider if the child's health and development needs to be re-assessed.

If the local authority considers the child at risk of significant harm, or beyond parental control, then they will start the process of applying to the family courts for a Care Order under section 37 of the Children's Act, or they will seek joint parental control under section 20 of the Children's Act 1989.

Local Authorities assess each case against a threshold to ascertain which level of service, if any, is most suitable. The image below represents the decision making of the continuum of need when making these assessments:



Additional Flowcharts from Working Together to Safeguard Children 2018, also set out how cases flow through the various systems and are available to view on the government website [<https://www.gov.uk/government/publications/working-together-to-safeguard-children—2>]

## Appendix 3

### Statutory Duty and Guidance Documents

This policy sets out how SLNC, and the projects it runs, will meet its statutory duty to safeguard and promote the welfare of children. It has been developed in accordance with the law and guidance found at <https://www.gov.uk/> that seeks to protect children.

Further guidance in relation to the safeguarding topics covered in this policy include:

- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges.
- Working Together to Safeguard Children.
- Multi-agency Statutory Guidance on Female Genital Mutilation.
- Teaching Online Safety in Schools.
- Information About Mandatory Reporting of Female Genital Mutilation.
- Protecting Children from Radicalisation: The Prevent Duty.
- Prevent Duty Guidance: England and Wales.
- Inspecting Safeguarding in Maintained Schools and Academies.
- Inspecting Safeguarding in Early Years, Education and Skills Settings.
- Preventing Youth Violence and Gang Involvement.
- Criminal Exploitation of Children and Vulnerable Adults: County Lines.
- Sexual Offences Act.
- The Children Act 1989 and 2004 and The Education Act 2002.
- Mental Health and Behaviour in Schools: Departmental Advice.
- Multi-Agency Statutory Guidance on Female Genital Mutilation.
- Learning Together to Be Safe - prevention of violent extremism.
- The Prevent Strategy: A Guide for Local Partners in England.
- NSPCC Child Protection Guidance [www.nspcc.org.uk/childprotection](http://www.nspcc.org.uk/childprotection)
- Safeguarding children who come from Black, Asian & minoritised ethnic communities; d/Deaf & disabled children & young people; LGBTQ+ children & young people; children with special educational needs & disabilities (SEND) [www.learning.nspcc.org.uk](http://www.learning.nspcc.org.uk)

If anyone wishes to seek further information or guidance, they can speak to the DSL or refer to the above documents.

# Appendix 4

## Considerations when contacting another Agency/Service

### 1) *Effective Communication between Agencies*

Effective communication requires a culture of listening to and engaging in, dialogue within and across agencies. It is essential that all communication is as accurate and complete as possible and clearly recorded. Accuracy is key, for without it effective decisions cannot be made and equally, inaccurate accounts can lead to children remaining unsafe, or to the possibility of wrongful actions being taken that affect children and adults. Before contacting another agency, think about why you are doing it, is it to:

- **Share Information** - To share information is the term used to describe the situation where practitioners use their professional judgement and experience on a case by case basis to decide whether and what personal information to share with other practitioners in order to meet the needs of a child or young person (CWDC 2009)
- **Signpost to Another Service** - The definition to signpost is to indicate direction towards. It is an informal process whereby a professional or a family is shown in the direction of a service. If someone is signposted to a service it is because accessing the service may enhance the family's quality of life, but there would be no increased risk to the child or young person should the service not be accessed. No agency is responsible for the monitoring or recording of signposting.
- **Get Advice and Guidance** - Seeking advice and guidance at any time, making a general query or perhaps consulting with a specialist colleague within your own organisation (or from another agency) may enhance the work that you are doing with a child, young person or family at any stage. It could be that you want further information about services available or that you want some specialist advice or perhaps need to consult about a particular issue or query for instance to ask if making a referral is appropriate. The name of the child and family must be anonymised at this stage unless agreement to share the information has already been obtained. It is vital that you record that you have sought information and advice in your own records. The agency you are contacting may not record this information, particularly if the case is not open or active with them. It should be agreed between agencies in this situation as to who records what information.
- **Facilitate Access to a Service** - If you think that a family may benefit from a service then directing, signposting or facilitating is appropriate. For example, a family approaches your service and asks for some advice about leisure activities in the local area. You give them the information and directions to the nearest open access leisure centre.
- **Refer a Child or Family** - If you think that by not accessing a particular service, a child's situation could deteriorate then a referral is appropriate. However, a referral is only the start of the process. You as the referrer have a responsibility to monitor that the service has been taken up and the child's situation has improved.

Sometimes you may need to draw on other support services, for example when an intervention has not achieved the desired outcomes and the child/young person requires more specialist or sustained support. A specific gap in services to meet a need or any level of concern warrants follow up and monitoring to ensure there is no risk to children. At the end of the conversation both parties must be clear about the outcome and the next course of action.

## **2) Professional Differences**

Where there are any professional differences about a particular decision, course of action or lack of action you must consult with a Senior Manager within your own organisation about next steps.

## **3) Recording**

Well kept records about work with a child and his or her family provide an essential underpinning to good professional practice. Safeguarding and promoting the welfare of children requires information to be brought together from a number of sources and careful professional judgements to be made on the basis of this information. These records must be clear, accessible and comprehensive, with judgements made and decisions and interventions carefully recorded. Where decisions have been taken jointly across agencies, or endorsed by a manager, this must be made clear (Working Together, 2018). There must be details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome (KcSie, 2021). You must record your decision and the reasons for it, whether or not you decide to share information. If the decision is to share, you must record what information was shared and with whom. You must work within your agency's arrangements for recording information and within any local information sharing procedures in place. These arrangements and procedures must be in accordance with the Data Protection Act 2018 and GDPR (2018)

# Appendix 5

## Good Practice Guidance for staff, freelance workers and volunteers

### 1. Safe Behaviour

- Treat everyone with respect
- Listen to children and young people
- Provide an example you want others to follow
- Always respect a child's right to personal privacy, protection and safe environment
- Never make salacious, suggestive or demeaning remarks / gestures towards a child
- Avoid any physical horseplay with a child or any actions someone else may misinterpret, no matter how innocent and well intentioned your actions may be
- Avoid situations that compromise your relationship with children and young people and are unacceptable within a relationship of trust
- Always encourage children, young people and adults to feel comfortable, caring and confident enough to point out to you attitudes or behaviours they do not like (including your own)
- Provide appropriate access and space for children and young people to talk about concerns they may have
- If you suspect that a child is becoming inappropriately attracted to you (or another volunteer), you must share your concerns with your manager or the Designated Safeguarding Lead
- **Do not use your personal phone / camera for taking, sending, receiving or storing images of children in SLNC or in the projects it runs.** Images, video, audio and any other forms of media should not be stored on unencrypted portable equipment. The DSL must be notified and agree before any new equipment is used for taking images of children so to ensure the equipment and procedures for doing so are suitable. This includes timescales for transferring the data securely, deleting it from the authorised portable equipment and using the data appropriately (e.g. it conforms to our Photographic and Media Consent Policy and Data Protection Policies). Any designated work laptops, mobile phones, memory sticks, iPads and any other portable equipment involved in this process must be returned to secure storage as soon as possible, even after images have been 'deleted'.

### 2. One-to-one situations

- Always avoid being alone with a child. Stay within earshot and eyesight of another adult or staff member.
- It may be necessary for you to be alone with a child, such as in an emergency situation. In these circumstances you **MUST** do your best to balance dealing with the situation in front of you with potential safeguarding issues. For example, a child has injured them self very badly

and you need to physically touch them to stop the bleeding while help arrives.

- If you are on your own with a child NEVER have the door locked, and stay outside in the open if possible.
- If you do need to take a child into a building (e.g. the first aid room), notify another adult. Try to find a room with a window in the door, or a ground floor room with windows for example. Consider leaving the door open or ajar unless this would put the child more at risk.
- Where possible maintain a gap/barrier between you and a child.
- Do not isolate yourself from the rest of the group.
- Ask a colleague to carry out random spot checks.

### **3. Unacceptable Behaviour:**

- Losing your temper
- Raising your voice unnecessarily
- Inappropriate language or behaviour
- Sarcasm
- Isolation
- Unfavourable comparisons
- Withholding praise
- Threats and intimidation
- Berating
- Scapegoating
- Criticism

### **4. Never:**

- Raise your hand
- Hit a child
- Strike or use an implement on a child
- Grab or pull at a child's clothing
- Have any inappropriate touching or contact with a child whether 'invited' or not
- Use inappropriate restraint
- Throw objects
- Make suggestive remarks / gestures / materials
- Use flattery
- Use innuendo
- Sexually harass
- Permit abusive peer activities (for example: ridiculing, bullying, name calling)
- Show favouritism to any individual
- Rely on your 'good name' to protect you
- Let suspicion, disclosure or allegations of abuse, go unrecorded or unreported
- Jump to conclusions without checking facts
- Believe 'it could never happen here'
- Believe 'it could never happen to me'

- Make contact via social networking media with any young people
- Share any of your personal contact details with young people.

#### **5. Saffron Acres and Saffron Heath Good Practice:**

- Displays the name and contact details of the DSL in a place accessible to all via posters on site in prominent locations
- Ensures that all staff working with children and adults receive appropriate safeguarding training
- Deals with any allegation about a child or adult swiftly
- Does not, under any circumstances, allow visitors to wander around the premises unaccompanied. Visitors are by appointment only unless there is a prearranged open day, which all visiting groups are made aware of in advance in writing
- Endeavors to maintain appropriate staff ratios on site
- Is alert to strangers frequently waiting outside the Saffron Acres and/or Saffron Heath gates with no apparent purpose
- Whilst it is the responsibility of named carers and guardians of visitors and volunteers to ensure the safety of their children or vulnerable adults outside of our project, we encourage everyone to let staff know of any arrangements for picking up / dropping off outside of the gates if there is a change-over of carer or guardian.
- If arrangements have been made for a young person to attend independently (e.g. for work experience) the procedures in place for that young person must be followed, and will include arrangements for the young person arriving & leaving. Staff must familiarise themselves with the arrangements for all work experience students before their placement commences.
- In the event that a room, rooms or designated areas within the organisation are provided for use by other organisations, the visiting organisation must agree to abide by our safeguarding policies and all other relevant guidelines, policies and procedures.

#### **6. In the event that a child or other individual discloses a potential child protection issue, you must at all times:**

- Allow the person to speak and do not interrupt nor make suggestions to them which could imply making an investigation;
- Do not interrogate or question other than to clarify your understanding. If the matter is to be investigated further this will be done by trained professionals.
- No matter how well you know the person, spare them having to repeat themselves over and over. Apart from anything else, they may begin to think that you don't believe them;
- Listen to the person and take what they say seriously. Tell them that they've done the right thing by telling you;
- Reassure the person that s/he was right to tell you what happened and that you feel privileged that they chose to confide in you;
- Be honest, tell the person that you cannot keep it a secret, you have to talk to someone else that can help;

- Remain calm, no matter how difficult it is to listen to the person – think of how hard it must be to say it. Some things are very difficult to talk about, you've been chosen because the person feels able to talk to you. If you show anger, disgust, disbelief then the person may stop talking for fear of upsetting you further or feel that your negative feelings are being directed towards them;
- Never trivialise or exaggerate abuse issues;
- As soon as practical write down everything the person told you, as accurately and factually as possible.
- Remember it is not your job to decide if abuse has taken place – it is your responsibility to report concerns.

#### 7. What to do if you have an **urgent concern** about a child:

- The Designated Safeguarding Lead (DSL) is the person responsible for making decisions about where to take child protection concerns.
- Inform the lead member of staff on site or the Designated Safeguarding Lead (0116 283 7212) **as soon as possible**. If the DSL or Deputy DSL is not available, and the situation is clearly urgent, e.g. the child who may be in need of protection, is too frightened to go home or you have very serious doubts about their safety, then you should pass the information to the police (101) without delay. You should not be afraid to contact them for advice and guidance on their non-emergency lines. (*In an emergency always dial 999*)
- Remember – you may not be the only one to have concerns. All referrals are discussed thoroughly by professionals prior to any action being taken. Your concerns will be genuine and treated as such by them.

#### 8. What to do if you have a **general concern** about a child's welfare:

- If the concerns are more general about a child's welfare, you should discuss these with the DSL. The DSL will make the decision about whether to refer the matter [e.g. to social services or police] or to log the concern without making a referral.
- Even if the concern seems trivial *still report it*. By making sure all concerns are logged, patterns of behaviour or incidents can be detected that can build a 'bigger picture' and could trigger a referral in the future.

#### 9. What to do if you have a **concern about a member of staff, a Board member, freelance worker or volunteer**

- Concerns about the behaviour of a Board member, member of staff, freelance worker or volunteer must be reported to the DSL without delay. The DSL will take appropriate action that may include contacting the police and/or social work and making a referral to DBS.
- If the concerns are about the DSL, the matter should be reported to the Deputy DSL or Charity Chair. In the event that they are also implicated, the concern should be taken directly to the police or social work services [SLNC Whistleblowing Policy should also be followed].