

Ref 21



SAFEGUARDING POLICY

The Shires Stretton

REGISTERED MANAGER:

Munya Sachikonye (awaiting registration)

RESPONSIBLE INDIVIDUAL:

Charlotte Niekerk

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1.0 Policy statement

1.1 Outcomes First Group is committed to ensuring that children and young people are effectively safeguarded in all the services we provide.

Safeguarding and child protection must always be the highest priority and at the forefront of everything we do. A whole setting approach is required to ensure safeguarding and child protection are embedded in all decisions, planning, policy and day-to-day operations and activities.

It is essential that everybody working within the Outcomes First Group understands their safeguarding responsibilities and undertake regular training.

1.2 All Outcomes First Group staff and volunteers working directly or indirectly with children and young people **must** ensure that:

- children and young people feel safe and that they are listened to;
 - they create an environment in which children and young people feel valued;
 - the best interests of the child are always considered and acted upon;
 - safer recruitment procedures are rigorously followed (please refer to the Outcomes First Group Safer Recruitment Policy for further details);
 - they understand their roles and responsibilities in keeping children and young people safe through ongoing learning, development and supervision;
 - they are vigilant in monitoring possible signs of abuse including for those children and young people who have complex learning difficulties or specific communication needs;
 - they are aware that children can abuse other children (i.e. child-on-child abuse)
 - they maintain an attitude of '**it could happen here**';
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- they follow the appropriate procedures in place for sharing safeguarding concerns and that these are shared with relevant professionals in a timely manner;
 - they understand and implement local safeguarding procedures as set out in local authority arrangements;
 - children and young people have opportunity to learn about appropriate relationships with adults and recognise unacceptable behaviour by adults and children.
 - there is a zero-tolerance approach to harassment, violence, abuse, inappropriate behaviour and bullying of any kind are not acceptable and will not be tolerated.

2.0 What is safeguarding and child protection?

2.1 Safeguarding

Safeguarding relates to the action taken to promote the welfare of children and young people to protect them from harm. It is defined in [Working Together to Safeguard Children \(DfE, Sept 2018, updated July 2022\)](#) as:

- Protecting children from maltreatment;
- Preventing impairment of children's health and development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

2.2 Outcomes First Group adopts a contextual safeguarding approach to safeguarding and child protection. Contextual safeguarding is: *'...an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Contextual Safeguarding, therefore, expands the objectives of*

child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.' (Dr Carlene Firmin)

2.3 Child Protection

Child protection is an important aspect of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. All agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

2.4 Safeguarding is everyone's responsibility

While local authorities and placing authorities have statutory responsibilities regarding safeguarding, Outcomes First Group believes that safeguarding is everyone's responsibility and expects that staff keep the child or young person at the centre of all that they do and that any actions taken are in the best interests of the child. Children and young people should always be listened to, and their voices are always heard.

2.5 Defining Significant Harm/Child Abuse

'Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, including: sexual, physical and emotional abuse; neglect; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever the form of abuse or neglect, practitioners should put the needs of children first when determining what action to take' (Working Together to Safeguard Children July 2018, updated July 2022)

2.6 The Children Act 1989 introduced the concept of 'Significant Harm' as the threshold that justifies compulsory intervention in family life in the best interests of children. Under Section 47 of the Act, local authorities have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or is likely to suffer Significant Harm.

2.7 Under s31(9) of the Children Act 1989, as amended by the Adoption and Children Act 2002: **'harm'** means ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another; **'health'** means physical or mental health; and **'ill-treatment'** includes sexual abuse and forms of ill-treatment which are not physical. Abuse or neglect is not always easy to identify; staff are more than likely to have some information but not the whole picture.

2.8 There are four defined categories of child abuse, which are deemed to be forms of 'Significant Harm': Neglect; Physical Abuse; Emotional Abuse; Sexual Abuse.

2.9 It is also important to be aware that:

- technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face-to-face. In many cases abuse will take place concurrently via online channels and in daily life.
- that children can abuse other children (often referred to as Child-on-child abuse) and that it can happen both online and offline.

2.10 All staff must be aware of the signs and indicators of child abuse.

Some common signs staff should be alert to that may indicate something concerning may be happening in a child's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent/carer
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body.

These signs do not necessarily mean that a child is being abused, there could be other things happening in their life which are affecting their behaviour. Staff should discuss any concerns with the Safeguarding Lead.

Please also refer to **Section 9.0 Reporting Concerns**

3.0 Local Arrangements for the home

- 3.1** All staff must be aware of the local arrangements for safeguarding relevant to the home in which they work;
- 3.2** The local arrangements for The shires home are as follows
- 3.3** The Shires safeguarding arrangements are in line with local safeguarding partnership arrangements. The local safeguarding partnership consists of the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police force in the local authority area)
- 3.4** The Local Authority Designated Officer/ Designated Officer for Allegations or equivalent officer is **Jim Foy, & Donna Cole**, Telephone number- **01572 758454** to contact via email is- LADO@rutland.gov.uk
- 3.5** All safeguarding referrals must be reported to the local authority Duty Team - **01572 758 407** or email to: childrensreferrals@rutland.gov.uk . Referrals for children and young people under 18 will be dealt with under the Children's safeguarding arrangements, whereas those 18 and above will be dealt with under the

Adult Safeguarding Arrangements:

It is everyone's business to report abuse. If you're concerned about the safety and welfare of an adult in Rutland you should contact our Adult Social Care, Prevention and Safeguarding Team straight away by calling 01572 758 341 or can contact the Police on Telephone:101 (non-emergency), 999 (emergency) or email: Adultduty@rutland.gov.uk

- 3.6** The local authority safeguarding referral procedure is:

"anyone who has a concern about a child's welfare should make a referral to children's social care services. When there are concerns about significant harm, the referral must be made Immediately. The greater the level of perceived risk, the more urgent the action should be... The Duty social worker should acknowledge within 1 working day of receiving it. If the refer has not received a response within 3 working days he/she should contact the manager in Children's social care services team again.

"within one working day of a referral being received the social worker should make a decision about the type of response that is required. This will include determining whether:

- The Child requires immediate protection and urgent action required
- The child is in need, and should be assessed under section 17 of the children act 1989;
- There is reasonable cause to suspect that the child is suffering, or likely to suffer, significant harm and whether enquires must be made and the child assessed under section 47 of the children act 1989, following a multi-agency strategy meeting discussed;
- Any services are required by the child and family and what type of services;
- Further specialist assessments by the child and family and what type of services;
- Further specialist assessments are required in order to help the local authority to decide what further action to take; or
- No further action will be required

“feedback should be given by Children’s social care services to the refer on the decisions taken. Where appropriate, this feedback should include the reasons why a case may not meet the statutory threshold to be considered by Children’s Social Care Services for assessment and suggestion for other sources of more suitable support”

3.7 For all referrals regarding radicalisation:

“CONTEST is the overall UK strategy for countering terrorism. The Aim of CONTEST is to reduce risk to the UK and its interests overseas from terrorism, so that people go about their lives freely and with confidence. It has four streams, of which PREVENT is one. The Purpose of the Prevent Strategy is to stop people becoming terrorists or supporting terrorism.”

“The Strategy addresses all forms of terrorism and focuses work to prevent radicalisation on three key objectives:

- Challenging ideology that supports terrorism;
- Protecting venerable individuals; and
- Supporting sectors and institutions where there is a risk of radicalisation”

“Channel is a key element of the Prevent strategy. It is a multi-agency approach to protect people at risk from radicalisation. Channel uses existing collaboration between local authorities, statutory partner (such as education and health sectors, social care, children’s and youth services and offender’s management services), the Police and the local authority to:

- Identify individual at risk of being drawn into terrorism;
- Asses the nature and extent of that risk;
- Develop the most appropriate support plan for the individuals concerned.

“An agency or member of the public can make a referral to Channel. A referral from an agency/organisation should go via the Designated safeguarding lead. The Designated Safeguarding Lead should then discuss with the Police Prevent Team, tel 101 or go to www.eastmidlandsprevent.co.uk

3.8 For all referrals regarding exploitation:

“ If a practitioner is concerned that a child or young person is involved or likely to be involved in a sexual exploitation and /or trafficking, they should immediately make a referral to Children Social Care or the Police CAIU. The practitioner should make the referral to the local area duty team or the police.

If the Child or young people has (or is awaiting allocation of) a social worker, the duty team should send the referral to the named social worker, or in their absence the team manager. Sending all sexual exploitation referrals to the duty teams enables Children’s Social Care to ensure a coordinated response.

Agencies with statutory child protection duties must consider, at all stages, the need for urgent action that may be necessary to secure the child/young person’s safety.

Should the professionals have concerns that they would like to discuss prior to a referral, they can do so by consulting with the safeguarding lead in their own agency or directly with the key contact in Children’s Social Care. All professionals are encouraged to seek advice if

they are not sure there is sufficient 'evidence' or are not sure about the possible risk indicators.

In relation to confidentiality, where there are concerns that a child or young person is subject to sexual exploitation/trafficking, all agencies have a responsibility to report their concerns and share information. The need for a child or young person to be safeguarded overrides their right to confidentiality. Data protection should not prevent the sharing of information but ensure that relevant information is shared appropriately"

3.9 The Outcomes First Group Head of Safeguarding/Safeguarding Adviser can be contacted at: safeguarding@ofgl.co.uk

4.0 Safer Recruitment

The Outcomes First Group Safer Recruitment Policy sets the processes which must be followed for the recruitment of staff and volunteers.

5.0 Safeguarding Training and Updates

5.1 All staff must read the following Outcomes First Group's policies and procedures:

- Behaviour Management Policy
- Use of Restrictive Practices and Restraint Terms of Reference
- Countering-bullying policy
- Exploitation policy
- Protecting Children from Radicalisation policy
- Data Protection policy
- Staying Safe Online
- Gaming Devices Best practice
- Managing Allegation Policy and Procedure
- Safer Recruitment policy
- Whistleblowing Policy
- Complaints Policy
- Code of Conduct & Ethics Policy

5.2 Safeguarding updates must be regularly provided to staff, through training, meetings or through regular written updates.

5.3 All staff must complete the mandatory training:

- Introduction to Safeguarding (e-learning) to be completed within the first week of employment.
- Safeguarding Children Foundation (Virtual Instructor lead (Zoom) training) within one month of employment and on a three-year refresher cycle.

In the interim years, a line manager competency check must be completed (via competency check on Shine) and if there are any concerns regarding competency or knowledge the team member will be referred to complete a refresher or original safeguarding course.

At the three-year point, the team member must complete either Safeguarding Foundation training, or the Safeguarding Refresher (both are Virtual Instructor Lead (Zoom) training).

If a service has a specific need or issue in relation to Safeguarding, then they can request a closed virtual or closed face-to-face course to support with the need.

Contact details for setting's Regional Training Manager can be found on Engage: <https://app.employeeapp.co.uk/page/3621>

5.4 All members of the home management team should also be familiar with *Working Together to Safeguard Children 2018* (updated July 2022).

5.5 If a child is at immediate risk of harm the police must be contacted immediately.

Concerns about the abuse or neglect of a child **must be reported immediately to the Safeguarding Lead (Registered Manager)**, who will follow local safeguarding reporting procedures. The **Safeguarding Lead must act as quickly possible**, share the information appropriately and ensure it is **reported no later than 24 hours** from when they become aware of the matter. The Group Head of Safeguarding/Safeguarding Adviser should also be emailed: safeguarding@ofgl.co.uk. Please see Section 8 for further information about Reporting concerns.

6.0 Partnership working and sharing information

6.1 Partnership working and the sharing of information is key in keeping children safe. Everyone who has a role to play in caring for children has a duty to share good quality information with the relevant professionals in a timely manner.

6.2 General Data Protection Regulations

All homes must ensure that they comply with the Group's Data Protection Policy which incorporates the GDPR requirements. The GDPR works around the principles of consent and assumes the automatic right of privacy to all individuals. This applies to children and young people's personal information, as well as that of staff and parents/carers.

6.3 GDPR is not a barrier to sharing safeguarding information. Safeguarding concerns must always be passed on. It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal information required and that the sharing of information will enhance the safeguarding of a child in a timely manner. It is legitimate to share information without consent where:

- it is not possible to gain consent;
- the home cannot reasonably be expected to gain consent; and
- if to gain consent would place a child at risk.

Where there is any doubt, the Safeguarding Lead should contact the Outcomes First Group's Legal Team for clarification.

6.4 All staff must complete the GDPR training. **All staff have a responsibility to ensure that they comply with the GDPR requirements.**

6.5 Homes must ensure that they inform young people, parents and carers of how their personal information will be stored and used. Homes must hold emergency contact details of the parents/carers and social worker of young people. Where possible, homes should hold more than one set of contact details for each child. This is to be done with the agreement of the parents/carers.

6.6 Homes should have clear arrangements in place for the processes and principles for sharing information within the setting and other Outcomes First Group Divisions, and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required. **Staff are required to be proactive in sharing information as soon as possible when it is in relation to a child's safety or wellbeing.**

Any transfer of safeguarding information must be done securely and all GDPR requirements must be followed.

6.7 Data breaches must be reported immediately to the Data Protection Manager as set out in the Data Protection Policy.

7.0 Safeguarding Lead (Registered Manager)

7.1 The Registered Manager is the Safeguarding Lead for the home and is responsible for ensuring that the safeguarding policy is followed. Where necessary they should liaise with the Responsible Individual for advice and guidance.

7.2 The Registered Manager must ensure that:

- there are clear monitoring arrangements in place which allows them to have effective oversight of all safeguarding matters and of all serious incident notifications.
- all staff have been recruited in line Outcomes First Group's Safer Recruitment Policy
- all staff receive a clear induction, including training on their safeguarding responsibilities and all safeguarding policies and procedures.
- there are clear arrangements for staff to be able to inform a senior manager of any safeguarding concerns they may have at all times.

7.3 The main responsibilities of the Safeguarding Lead (Registered Manager) are to:

- provide support to staff regarding safeguarding concerns.
- lead on advising staff of any action to be taken due to a safeguarding concern.
- ensure that children and young people are immediately safeguarded from harm and abuse.
- ensure that there is appropriate cover during their absence, and that staff know who to approach if they are unavailable.
- liaise with local authorities and other professionals, sharing information and fully assisting with any enquiries.
- adopt a child-focused and holistic approach ensuring the child's wishes and feelings are taken into account when determining what action to take;
- liaise with Outcomes First Group Head of Safeguarding/Safeguarding Adviser and HR Team if any allegations or suspected harm having been caused to a child by an employee, supply staff or volunteer for Outcomes First group.
- refer allegations to the Local Authority Designated Officer/ Designated Officer for Allegations or equivalent officer.
- refer safeguarding concerns to placing and host local authorities.
- refer suspected cases of radicalisation to Channel.
- refer suspected case of Female Genital Mutilation to the police.
- refer suspected cases of Child Sexual Exploitation and trafficking to the police.
- refer cases to the Disclosure and Barring Service after staff have been dismissed or there is suspected harm having been caused to children and young people.
- ensure that the home complies with the work of the local safeguarding partnership.
- ensure that all staff receive regular updated training in relation to safeguarding.
- provide safeguarding updates to senior managers.
- ensure that there is effective monitoring and oversight of all safeguarding concerns.
- ensuring the notification of serious incidents to Ofsted
- promoting the educational achievements of Looked After Children in line with the Children and Social Work Act 2017.
- Be aware of the requirement for children to have an Appropriate Adult (See [PACE Code C 2019](#)) if they are searched or detained by the police.

7.4 It is important that all staff understand the role of the Safeguarding Lead on their appointment within the home and as part of their induction. The Safeguarding Lead is responsible for

ensuring that all staff understand their roles and responsibilities regarding safeguarding children and that a child-focused approach is taken. The Safeguarding Lead will assess safeguarding concerns within the context of children's/young people's environments, which is known as contextual safeguarding.

7.5 The Safeguarding Lead must ensure that clear, concise and good quality documents are kept of all allegations or safeguarding concerns. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved.
- a note of any action taken, decisions reached and the outcome.
- reports about incidents of sexual violence should include the time and location, so action can be taken to make the location safer if required.

If in doubt about recording requirements, staff should discuss with the Registered Manager.

7.6 The Responsible Individual for the home must maintain oversight of safeguarding matters within the home, provide advice and guidance to the Safeguarding Lead and ensure that the safeguarding policy and Ofsted notification process is followed. **The Responsible Individual must ensure they fulfil their legal responsibility for all safeguarding matters in the home.**

8.0 Roles and Responsibilities of Staff

8.1 Safeguarding is everyone's responsibility; a collective and holistic approach to safeguarding is required. All staff must understand their roles and responsibilities regarding keeping children safe and reporting concerns.

8.2 During staff induction, staff will receive safeguarding training. Staff must be familiar and understand the role of the Safeguarding Lead, the local safeguarding partnership and the individual systems relating to safeguarding within the home. Staff must also know, understand and implement the home's behaviour management policy, the home's code of conduct, and the safeguarding response to children who go missing.

8.3 Staff are responsible for:

- compliance with Outcomes First Group policies, statutory guidance and legislation, including Working Together to Safeguard Children (2018, updated July 2022);
- ensuring they understand the role of the Safeguarding Lead.
- helping to develop a culture which helps children and young people to understand about abuse, appropriate and safe relationships with adults and peers, and keeping safe both online and offline.
- helping to provide an environment where children and young people feel safe and valued.
- attending training and meetings.
- ensuring that they fully understand how to report concerns and if not, asking for further training and support.
- understand the safeguarding response to children who go missing.
- listening to children and young people
- supporting children and young people if they disclose safeguarding information.
- being alert to signs of abuse by other children or adults and aware of indicators or possible signs of neglect.
- closely monitoring any possible signs of abuse or harm for those children who are unable to communicate verbally or who have complex health and care needs.

- keeping sensitive information confidential and sharing it only with those professionals for whom it is relevant.
- helping to implement Child Protection Plans.

8.4 Staff are in a close position to children and young people within homes as they have regular contact with them and so are in the best position to know if a child or young person is behaving in a way which could possibly indicate that they are being hurt or harmed. Any concerns, whether these are nagging doubts, worries, concerns or based on information told

to them, must be reported **immediately** to the Safeguarding Lead both verbally and in writing. **It is the staff member's responsibility to ensure that this information is acted upon. They have a duty to follow up with the Safeguarding Lead to ensure action has been taken.**

8.5 It is important that staff are aware that children may not find it easy to tell an adult about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

8.6 Staff must ensure that the children and young people that they support know:

- that they can tell them if they have any concerns and feel confident that they will be listened to and supported.
- they can also report any concerns by emailing *tellus@ofgl.co.uk*, which is monitored by the Outcomes First Group's Quality Team.
- the NSPCC dedicated helpline 0800 136 663
- how to contact Childline.

9.0 Reporting concerns

9.1 What to do if a child or young person discloses

Systems should be in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

If a child or young person discloses information to a member of staff, they must ensure that they:

- listen to the child or young person and reassure them they are being taken seriously and that they will be supported and kept safe;
- do not dismiss what the child or young person tells them. All concerns must be acted upon rigorously.
- never give the impression that they are creating a problem by reporting abuse, violence or sexual harassment. They must never be made to feel ashamed for making a report.
- do not promise to keep it a secret. They must explain that they have a duty to share information to keep them safe and protect them.
- write down what the child or young person tells them. This must be accurate and, in the child's, words;

- immediately report the concerns to the Safeguarding Lead or deputy home manager. If neither is available, the member of staff must report the information to the Head of Care, Responsible Individual or Principal/Head of Service.

9.2 All concerns, however small or trivial they may seem, **must** be immediately reported to the Safeguarding Lead. This must be done verbally and then followed up **on the same day** and documented on the home records. The member of staff has a responsibility to ensure that action has been taken with regards to the concerns on the **following day** and that the concern is documented on the home records. If action is not taken in a timely way as the member of staff sees fit, they have a duty to escalate their concerns to the Head of Care, Principal/Head of Service or the Regional Director.

9.3 Staff must prioritise the child or young person's immediate safety. They must remain professional and adhere to all safeguarding and confidentiality procedures. After sharing the information with the Safeguarding Lead or deputy home manager, they must not share it with anyone else.

9.4 On receipt of the information, the Safeguarding Lead must consider all information and then report this within **one working day** to the host authority, placing authority, Principal/Head of Service, Regional Director and where relevant the Local Authority Designated Officer/ Designated Officer for Allegations or equivalent officer.

9.5 Low-level concerns

Where there are low-level concerns, i.e. where the behaviour towards a child does not meet the threshold of harm, Safeguarding Leads must document the concerns on a chronology in order to establish a full picture of what is happening for the child or young person. The child's social worker must be kept informed.

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the home may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is not considered serious enough to consider a referral to the Local Authority Designated Officer/ Designated Officer for Allegations or equivalent. Examples may include but are not limited to: being over friendly with children; having favourites; engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or using inappropriate sexualised, intimidating or offensive language.

9.6 If the Safeguarding Lead is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with the Local Authority Designated Officer or equivalent officer.

9.7 Records should be reviewed regularly so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Safeguarding Lead/Registered Manager (or Regional Director if the concern is about the Safeguarding Lead/Registered Manager) should decide on an appropriate course of action, either through its disciplinary procedures or, where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the local authority designated officer or equivalent officer.

9.8 Consideration should also be given to whether there are wider cultural issues within the setting that enabled the behaviour to occur and where appropriate policies and practice should be reviewed, and extra training delivered to minimise the risk of it happening again.

10.0 Child-on-child Abuse (also known as peer-on-peer abuse)

10.1 It is essential that all staff understand that abuse is abuse and the importance of challenging inappropriate behaviours between children of similar or different ages.

10.2 **It should be remembered that '... abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" or "boys being boys"'. Downplaying such behaviours can lead to a culture of unacceptable behaviours, an unsafe environment and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.**

10.3 Staff must ensure that they create a home environment where children and young people's safety is paramount and where unacceptable or unsafe behaviour will not be tolerated. Staff must be alert to possible signs of child-on-child abuse. Inappropriate language must be rigorously and consistently challenged.

10.4 Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children and young people.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, e.g. sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent,
- consensual and non-consensual sharing of nude and semi-nude images and or videos
- up skirting
- 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)

These forms of abuse can happen inside or outside of the home both offline and online.

10.5 Staff are advised to maintain an attitude of **'it could happen here'** and be vigilant to any signs. They **must act immediately and report any concerns regarding child-on-child abuse to the Safeguarding Lead.**

10.6 A child or young person being Lesbian, gay, bisexual or transgender (LGBT) is not in itself an inherent risk factor for harm. However, children who are LGBT, or are perceived to be LGBT, can be targeted by other children. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to share their concerns with members of staff.

10.7 A contextual safeguarding approach must be taken when considering possible child-on-child abuse. Children and young people who display harmful behaviours must be seen as potential victims themselves, and the wider environmental risks must be taken into account. Staff must challenge any gender bias or derogatory language used by staff or young people. Staff must not dismiss any concerns brought to them by young people. Staff can report concerns verbally, but they must ensure that all concerns are recorded onto the home's recording system on the same day.

10.8 When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well

as any relevant personal circumstances and how this relates to their behaviour. Homes must consider any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.

10.9 What to do if there are concerns

10.9.1 Safeguarding Leads must deal with any concerns of child-on-child abuse immediately and sensitively. As much information as possible must be gathered from the victim and the young person who has allegedly displayed harmful behaviour in order to gain the facts of what has happened.

10.9.2 The language used must be sensitive, non-judgemental and must not blame the victim. Victims must be supported and reassured that their safety and welfare within the home is the priority. Risk assessments must be implemented where necessary.

10.9.3 Where the Safeguarding Lead believes that there has been significant harm caused to the young person, a referral must be made to the local authority immediately. In agreement with the local authority, parents/carers must be informed. Where possible, as best practice, parents/carers are to be informed face to face.

10.10 If the local authority do not believe it meets their threshold for further action and the Safeguarding Lead is not in agreement, this must be challenged with the local authority.

10.11 After the outcome/conclusion of the incident:

- a contextual safeguarding approach must be taken.
- homes must take all necessary action to learn from the incident and prevent future incidents occurring, such as targeted work around specific types of child-on-children abuse;
- support for the victim must be offered and provided where possible. If necessary, appropriate risk assessments must be implemented to provide reassurance and safety for the victim.
- homes must ensure that they **do not** adopt a victim blaming approach.
- the Safeguarding Lead must complete an investigation into the incident. The investigation must consider the occurrence of the incident itself as well as whether it is an isolated incident, and the personal circumstances of the young person who is alleged to have displayed harmful behaviour;
- if necessary, appropriate referrals must be made to support services for the young person who has displayed harmful behaviours;
- a risk assessment to be completed and implemented for the young person who has displayed harmful behaviours in order to safeguard them and other young people.

11.0 Bullying

11.1 Severe or persistent forms of bullying can result in Significant Harm, which is why those providing services for children should have adequate policies, procedures, and training to counter bullying. Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see. It can be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable'.

11.2 Outcomes First Group has a zero-tolerance approach to bullying. All staff have a responsibility to challenge bullying even at a low level. Staff must help children and young people to understand what bullying is and how to report it. Bullying must be dealt with as a safeguarding matter. Staff must report any bullying concerns to the Safeguarding Lead **on**

the same day. The concerns must be documented on the Home's recording system.

- 11.3** Homes have a responsibility to ensure that those children and young people who bully, are supported and helped to understand the impact of their actions.
- 11.4** For further information please refer to the Anti-bullying Policy and useful information can be found in the DfE guidance [Sexual violence and sexual harassment between children in schools and colleges](#)
- 11.5 All staff have a responsibility to report any suspicions or concerns that a child has or may be mistreated or harmed.**

12.0 Preventative Strategies

- 12.1** The home will take all appropriate action to ensure that children and young people learn about appropriate relationships with adults and other children, keeping safe, online safety as well as sex and healthy relationships. Staff must ensure that children and young people have opportunity to learn about safe relationships between children as well as who they can talk to if they have any concerns.
- 12.2** For pupils who are non-verbal or have limited receptive and expressive communication and learning disabilities, more direct on-going observation is often required to support them and keep them safe, along with the direct modelling of safe behaviour by those responsible for their care. The support required must be tailored to the individual child's needs and be included in their Care Plan.
- 12.3** Children should be supported by staff to understand what abuse is. Children must be listened to and enabled to report any abuse or neglect at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse. This should include being able to access in private, relevant websites or help lines such as Childline to seek advice and help.
- 12.4** The home should recognise that some children and young people are more vulnerable by virtue of their complex health or behavioural needs, or disabilities. In these instances, all staff have a responsibility to be the 'eyes and ears' and report all concerns to the Safeguarding Lead.

13.0 Online Safety

- 13.1** For the children and young people we support, access to the internet and digital devices will be subject to the care planning and review process and will be risk assessed, in agreement with the local authority and family (where appropriate), to help keep them safe in the online world.
- 13.2** The home will help and support the children and young people in its care to develop knowledge and understanding to help them stay safe online, enabling them to recognise and avoid online safety risks and to help build their digital resilience.

The UK Safer Internet Centre provides advice, information and links to toolkits to help keep those in residential settings safe online. The following provide access these resources:

<https://www.saferinternet.org.uk/advice-centre/residential-care-settings>

<https://www.saferinternet.org.uk/blog/supporting-vulnerable-groups-online>

UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

[Harmful Online Challenges and Online Hoaxes](#) this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

[Undressed](#) provides advice about how to teach children about being tricked into getting undressed online, without scaring them or explaining the motives of sex offenders

National Crime Agency's CEOP education programme: [ThinkuKnow](#)

Please see the Group's Staying Safe Online Policy.

13.3 If a member of staff has reason to believe that a child or young person is experiencing harm or is at risk of harm, the reporting process set out in this policy in Section 8.0 must be followed immediately.

13.4 If staff become aware of an online incident that is a cause for concern, they should:

- Provide reassurance to the child or young person.
- Take immediate action to report any criminal offences to the police and social care.
- Inform the child or young person's placing authority and family as appropriate.
- Review the supervision and support arrangements for the child accessing the internet.
- Check the privacy and security settings on the child's devices and account.
- Agree what action will be taken to prevent recurrence and reduce risk, the risk assessment should be reviewed and updated. Further online safety learning requirements should be considered for the child.

14.0 Children who go Missing

14.1 All staff must be aware of the risks associated with children who go missing from home, and particularly that very often missing incidents are a warning sign of other safeguarding concerns such as exploitation, forced marriage, FGM, substance misuse or mental health problems. The risk of exploitation and abuse increases for those children and young people who go missing from home and school. Early identification and intervention is a priority.

14.2 Homes must ensure that all young people at risk of going missing have a clear risk assessment and a clear plan for what needs to be done if the young person goes missing. All staff must sign to show they have read the plan and understand what they need to do. The plans should be agreed with the young person's social worker and, where possible, the young person's parents and the young person themselves.

14.3 The Safeguarding Lead is responsible for investigating any unexplained absences and for ensuring a 'return from missing' interview is requested from the local authority. Reasonable enquiries must be made to locate a child or young person who is missing, and staff are expected to act as a reasonable parent would in terms of actively trying to find and retrieve the young person. The Safeguarding Lead **must** refer any safeguarding concerns regarding the absence of a young person to the local authority. In cases where there are immediate concerns regarding forced marriage or FGM, the Safeguarding Lead must refer to the police immediately. All information **must** be documented on the home's recording system records.

14.4 Children and young people who are repeatedly missing are at particular risk of harm. Attempts must be made to talk to the child or young person about why they are missing from the home and/or education. Records must be kept of those discussions. Any safeguarding information which the child or young person discloses must be shared **immediately** with the local authority. If the child or young person discloses immediate safeguarding concerns, the Safeguarding Lead must share this information with the police.

14.5 The home should have full regard to the local missing protocols and procedures in place in their host local authority and police force area. Staff should always arrange a return home interview at the earliest opportunity which should be conducted by someone independent of the home and ideally Outcomes First Group.

15.0 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

15.1 Exploitation of children and young people is a form of child abuse and can include sexual exploitation or criminal exploitation. This occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and /or for financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

15.2 All staff **must** read Outcomes First Group's Child Exploitation policy.

15.3 All staff **must** know the definitions, signs and indicators of CSE and County Lines. Safeguarding Leads **must** provide or access ongoing training and learning to staff around exploitation. All staff **must** have training in exploitation.

15.4 Staff **must** report concerns regarding exploitation **immediately** to the Safeguarding Lead and document their concerns on home's records **on the same day**. Where there are immediate concerns relating to children and young people's safety due to exploitation, Safeguarding Leads **must** report concerns to the police immediately and make a same day referral to the local authority as well as to the Regional Director.

15.5 It is everyone's responsibility to help children and young people know about grooming and exploitation. Homes **must** ensure that children and young people know who to talk to if they have any concerns for themselves or other children.

16.0 Serious violence

16.1 All staff should be aware of indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from the home and/or school, 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, or 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.

16.2 All staff should be aware of the 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 and having been involved in offending, such as theft or robbery.

Further guidance for professionals can be found here:

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gangs-criminal-exploitation/>

17.0 'Honour'-based abuse – including Female Genital Mutilation (FGM) and Forced Marriage

17.1 Honour based abuse (HBA) can be described as practices which are used to control behaviour within families or other social groups in order to protect perceived cultural and religious beliefs and/or honour. The term 'honour-based abuse and violence' relates to the offender/s

interpretation of the motivation for their actions. It is a violation of human rights and for young victims it is a form of child abuse and is a child protection matter.

17.2 HBA can take many forms, it can include:

- forced marriage
- female genital mutilation (FGM)
- Breast ironing
- virginity testing
- physical, sexual and economic abuse and coercive control

Victims can experience multiple forms of abuse and multiple perpetrators can be involved.

17.3 Staff have a specific legal duty to:

- share concerns regarding FGM with the police.
- to share concerns with the Safeguarding Lead and to report any concerns. In suspected cases of FGM, staff must refer to the local authority as well as the police. The Safeguarding Lead will assist and support staff with this.

Staff must read and be familiar with statutory guidance regarding reporting FGM 'FGM Fact sheet': <https://www.gov.uk/government/publications/female-genital-mutilation-leaflet>

Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK](#)

17.4 If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they must speak to the Safeguarding Lead who will ensure that that concerns are shared **immediately** with the relevant Head of Care, Regional Director and that staff have documented them on the home records. As appropriate, the Safeguarding Lead will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

18.0 Preventing Radicalisation

18.1 Outcomes First Group fully recognises its responsibility to have arrangements in place to safeguard and protect children from radicalisation. This is known as the 'Prevent' duty.

18.2 All staff must be aware of the signs and indicators of radicalisation. Staff must be proactive in reporting any concerns, regardless of how small they may be, to the Safeguarding Lead. Safeguarding Leads must assist staff to report all concerns regarding radicalisation to the Police as well as the Head of Care and Principal/Head of Service and Regional Director. Staff must document their concerns on the home's records.

18.3 All staff must be aware of the local procedures relating to reporting radicalisation concerns.

Staff should read **and be familiar with** the Group's Combatting Extremism Policy

19.0 Physical Interventions

19.1 While every home creates an atmosphere of nurturing, unconditional positive regard and warmth, Outcomes First Group recognises that on occasion it may be necessary to use physical intervention to keep a child or young person safe. Physical intervention must be a last resort and must always be proportionate. Once the child is safe and calm, it is essential that there is a debrief with the child. It should be an open discussion with the member of staff encouraging the child to talk about how they feel and understand what happened.

The intervention and the follow-up action must be recorded on the Home's recording system.

19.2 All staff must read and know and follow the home's Physical Intervention Policy and the Group's [Use of Restrictive Practices and Restraint Terms of Reference](#)

19.3 If a child or young person makes an allegation after a physical intervention, it is important that the member of staff writes down as much information as possible. Staff must complete body maps immediately after the event and record onto home records. Staff must also verbally inform the Safeguarding Lead/deputy manager. **Medical attention must always be sought where appropriate for the young person.** Staff must inform their parents or carers and the local authority.

19.4 Allegations of harm relating to physical interventions must be reported to the Head of Care, Principal/Head of Service, Regional Director and the Local Authority Designated Officer/ Designated Officer for Allegations or equivalent officer. The Group Head of Safeguarding/ Safeguarding Adviser should also be emailed: safeguarding@ofgl.co.uk.

20.0 Allegations against Staff

An allegation is any concern, complaint or disclosure that indicates a member of staff, agency staff or volunteer or has:

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or relate to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

20.1 All allegations must be treated seriously. Staff must maintain an open mind and suspend all judgement. Staff have a responsibility to look after themselves and not to place themselves into situations which could present as unsafe. Staff must report any concerns to the Home's Safeguarding Lead.

20.2 When a child makes an allegation about a member of staff, the member of staff receiving the complaint must write everything down and immediately report the allegation to the Safeguarding Lead or deputy manager.

20.3 The Safeguarding Lead must ensure that they follow the **Outcomes First Group's Managing Allegations Procedure** and that allegation are managed in line with local safeguarding partnership procedures.

20.4 If the allegation is regarding the Registered Manager, then the Head of Care and Principal/Head of Service and Director for Care must be informed immediately. They will then seek advice from the Local Authority Designated Officer/ Designated Officer for Allegations or equivalent officer.

20.5 All allegations made against staff must be reported to:

- **the Regional Director**
- **Human Resources (hropertationsadvice@ofgl.co.uk)**
- **Group Safeguarding Team (safeguarding@ofgl.co.uk)**

Outcomes First Group recognises that managing allegations can be challenging and so will support with the process.

- 20.6** It is the responsibility of the Safeguarding Lead to ensure that all allegations are managed in line with local safeguarding partnership procedures.
- 20.7** If there are concerns about the Safeguarding Lead/Registered Manager these concerns should be referred to a senior member of the Outcomes First Group (such as the Regional Director, Director of Operations, Chief Operating Officer or Chief Executive Officer). If there is a conflict of interest in reporting the matter to any of these internal colleagues, the concern should be reported directly to the local authority designated officer or equivalent officer.

21.0 Working with the Local Authority Designated Officer/ Designated Officer for Allegations or equivalent officer

21.1 In all referrals, the Safeguarding Lead is the lead professional within the home for ensuring that a timely response is received from the local authority or Local Authority Designation Officer/Designated Officer for Allegations or equivalent officer. If a response is received which the Safeguarding Lead believes is inappropriate and does not prioritise the child or young person's safety, this must be escalated to the Head of Care or Principal/Head of Service to agree further action.

22.0 Whistleblowing Please also see the Outcome's First Group's Whistleblowing Policy.

22.1 The Group recognises that on occasion staff may feel that they are unable to tell someone within their immediate place of work about any safeguarding concerns that they may have. The Group also recognises that children will be unable to voice their concerns if they are in an environment where staff also fail to voice their concerns.

22.2 All staff have a duty first and foremost to the children in their home. Any concerns, regardless of how small they may seem, must be reported. Safeguarding Leads and Principals/Heads of Service have a responsibility to ensure that they create an environment where staff feel safe to openly voice any concerns and that they feel listened to. It is also important that staff feel supported if concerns are raised about them. If staff see or hear about other colleagues practice which they are concerned about, which potentially may cause emotional or physical harm to a pupil, or if the standard of care being provided falls short of expectations, they must report this.

22.3 The Group has an anonymous telephone support system (Safecall) where staff are able to share any concerns that they may have, safely and without fear of reprisal. All whistleblowing concerns will be taken seriously and treated as such.

Staff can call Safecall on **08009151571**, report online **www.safecall.co.uk/reports**, or email **Outcomesfirstgroup@safecall.co.uk**

23.0 Response to Covid-19

23.1 The Covid-19 Pandemic has caused significant disruption to the lives of children, young people, parents, carers and staff. The safeguarding of children and young people always remains the highest priority in all circumstances. Whilst the impact of Covid-19 has decreased significantly, the home continues to have clear procedures in place for reducing the risk and spread of infection.

23.3 Each home will have individual arrangements and characteristics that may require site-specific arrangements. In such cases, the Regional Director of the setting should be informed.

24.0 Referrals

24.1 As a result of an allegation or investigation, a referral to other bodies may be necessary. This may include referrals to Disclosure and Barring Service, Social Work England, or Other professional bodies including the Care Council for Wales (CCW), and/or The Scottish Social Services Council (SSSC), Northern Ireland Social Care Council (NISCC) or Teaching Regulation Authority.

24.2 If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to DBS/ Disclosure Scotland must be made.

24.3 The Registered Manager is responsible for making any necessary referrals to the Disclosure and Barring Service and any relevant professional body in the UK. If a referral is made, at the

point of completion the Registered Manager must notify safeguarding@ofgl.co.uk and the Human Resources Advisor hroperationsadvice@ofgl.co.uk of the referral.

