

Safeguarding Young People and Child Protection Policy, Procedures and Guidance

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1. Introduction

1.1 Nacro is committed to safeguarding young people and we expect everyone who works for us to share this commitment. This policy sets out how Nacro will deliver these responsibilities and the role staff will play in ensuring that Nacro's commitment to safeguarding young people is fully met.

1.2 This policy applies to all directorates within Nacro where services are being provided to young people under the age of 18. Child or children means anyone under the age of 18. The term young person and child are both used in this document under this definition. Nacro has a vulnerable adult safeguarding policy that is to be used for all those over 18. In Education Directorate, both policies should be reviewed for those on Study Programme aged 16-19.

1.3 This policy should be read in conjunction with Working together to safeguard children' (updated February 2019), a guide to inter-agency working to safeguard and promote the welfare of children and young people and, for Nacro's Education Directorate, alongside 'Keeping Children Safe in Education' (KCSIE) (September 2019), which is statutory guidance to be read and followed by schools, colleges and FE Providers.

TO NOTE: Staff in Education and Trustees have to sign to say they have read part one of KCSIE and submit the declaration to Safeguarding Corporate lead.

These documents are available via the following links:

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Section 1: Purpose and Procedures

2. Purpose of the Policy

2.1 The purpose of this policy is to provide staff with clear guidance on what they must do to keep young people safe from harm. Where any have experienced abuse or harm, the role of the policy is to provide staff with guidance on what to do to provide young people with the support to address the effects of abuse and to prevent the harm or abuse from being continued.

3. Our Underpinning Principles

3.1 To support our staff in carrying out their safeguarding duties effectively, we have identified the following principles to inform their practice and to help create an effective safeguarding culture:

- We work on the basis that safeguarding is everyone's responsibility: all staff, including leaders at all levels, Nacro Directors and Trustees, volunteers, contractors and visitors
- We recognise the importance of enabling learners and young people to talk openly about anything that worries them and to feel confident that they will be listened to
- We will work with parents and carers to build strong working relationships, provide appropriate communication of any issues, should they arise, and support to parents to enable them to keep their children safe
- We will work with other agencies, sharing information as required and ensuring that they take the actions needed to keep our learners and young people safe.

3.2 Nacro's approach to safeguarding is structured around four areas:

- i. Prevention (e.g. positive atmosphere, support for young people, safer recruitment procedures lessons learned and new and best practice, advice and guidance)
- ii. Protection (by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding concerns)
- iii. Support (to young people who may have been abused and to staff dealing with safeguarding concerns)
- iv. Working with parents/carers and other agencies (to ensure appropriate communications and actions are undertaken and no child /incident /allegation slips between agencies).

4. Staff Responsibilities

4.1 All staff working with, or on behalf of young people, have a responsibility to safeguard and protect their welfare. (Please see structure charts at back of document.) This includes:

- i. Being aware of specific risks to individual young people through the risk assessments produced when they begin using Nacro services
- ii. Being alert to the signs of abuse
- iii. Reporting any concerns about a young person's welfare or safety.

It is important for all staff to understand the importance of reporting a concern no matter how small this is. Often, over time, a series of smaller concerns that are reported build up a bigger picture which shows that a young person is at risk of abuse or has already been abused or exploited and needs support.

4.2 The young people that Nacro works with and supports often come from challenging backgrounds. Many may have found school difficult, not experienced much success as learners, especially at secondary school, and may have a history of non or poor attendance. Some may have had involvement in criminal activities, drugs or gangs. Others will be very vulnerable either because of anxiety and mental health needs or because they have special educational needs.

4.3 As a general principal all members of staff and volunteers should:

- Make sure that you know the young people you work with well so that they can spot any changes in behaviour or demeanour which might signal abuse or risk of abuse
- Keep an eye on relationships amongst young people to check for any signs of bullying, harassment or abuse
- Not feel that anything you see or hear about outside the workplace does not need to be reported – information about events and issues happening in the local community or outside the centre are just as important in keeping young people safe. They help to build up a picture of who young people associate with, where they hang out and whether these present risks to safety – *this is known as contextualised safeguarding*
- Make sure that any concerns you have are reported in writing – there may be times when you may want guidance and wish to speak to the project designated safeguarding officers (DSO) beforehand, but, no matter how small the concern, it should be recorded so that it can be tracked over time
- Follow-up on any concerns by speaking with the DSO
- Follow-up with the DSO where you have submitted written concerns or shared information about risks to check that the DSO has taken action – staff do not need to know the details of the actions taken, but following up is a good way to prompt action to make sure it has been taken.

5. Procedures to Follow

5.1 Carrying out an initial risk assessment

If you are involved in admitting or registering a new young person for services, you should

- i. Carry out a thorough risk assessment at referral and/or enrolment stage; this includes checking in detail the past history of the young person with them, their family and any external agencies that have been working with the young person.

- ii. Put clear support plans in place to address the risks identified and review the assessment regularly
- iii. Make sure that you identify, in this initial checking process, if the young person poses any risks to other young people in receipt of Nacro services
- iv. If through the admissions process, a young person is considered a risk to others, then you should report this to your line manager and the DSO and work with the DSO to develop a plan to mitigate the risk
- v. If through the risk assessment process, you identify issues of vulnerability or risk of harm to the young person, or that the young person has experienced harm previously, report this to the DSO who will work with you, and other senior staff if necessary, to put a support plan in place.

5.2 What to look out for

On a day-to-day basis, staff and volunteers should maintain a vigilant eye on young people they are working with. You should be alert to any changes in behaviour or demeanour no matter how small. These changes include:

- change in mood
- change in dress or clothes
- being hungry
- being dishevelled
- clothes not being clean or in a good state
- arriving at the centre not having washed properly
- suddenly having expensive clothes and other items such as jewellery, phones etc.
- being in pain
- having bruises or trying to hide bruises or cuts that are not normal
- using discriminatory language in relation to other religious or ethnic groups
- suddenly becoming more religious or dogmatic about religion or faith
- goes missing or regularly runs away.

A fuller list of behaviours and changes to look out for are included at Annex 2.

5.3 Should you have a concern about a young person you must:

Report this as soon as possible to your line manager and to the DSO and through the Nacro IMS system.

You can also share concerns about behaviours during daily briefings, and/or team meetings and supervision sessions to check if other staff have noticed these too. If this is the case, then you may need to provide a new alert or further updated report through the IMS system or Open Housing for BASS.

5.4 Should a young person disclose a safeguarding issue, you must:

1. Listen to what the young person is saying
2. Make sure that you do not make any promises to keep the information confidential
3. Must tell the young person that you will need to share the information with the DSO or if the DSO is not available, your line manager; it is important that you do not share this wider than these two roles. The DSO will decide whether the matter needs to be escalated further
4. Not judge the young person or show your own emotions or views i.e. do not show shock at what you are being told
5. Not give views about the allegations or the person about whom allegations are being made
6. Reassure the young person that they have done the right thing in speaking about what they are experiencing
7. Reassure the young person that whatever is happening to them is not their fault
8. Not ask leading or probing questions or try to investigate it further yourself – this will be done by safeguarding professionals
9. Only ask questions to seek clarification
10. If possible, note down what the young person is telling you, and file a report of this on the Nacro IMS immediately following the disclosure, and tell your line manager and DSO
11. If it is not possible to take notes at the time, make a report on the Nacro IMS immediately after the disclosure while all the information is still fresh
12. If, during a disclosure, it becomes clear that the young person is likely to be unsafe if they leave the setting, or their current location/home if they have come to you, you should not allow them to leave until plans have been made for their safety, and should take young person to the DSO, ask the DSO to attend or contact the DSO to seek advice immediately and to get support from Local Authority services
13. If the young person is at immediate risk of harm or has been harmed, i.e. serious sexual or physical assault, call the Police, and if necessary, an ambulance and alert the DSO immediately. Children's Services/Social Care should also be informed by DSO, line manager or yourself, as agreed. The LADO¹ (the local area designated officer) will need to be informed if the disclosure involves an allegation against a member of staff or volunteer.
14. There may be circumstances where social services or an ambulance may be more appropriate. In this case, your key responsibility is to alert the DSO immediately who will then call the appropriate authority, including the LADO (the local area designated officer) in the event that the disclosure involves an allegation against a member of staff or volunteer, or ask you do so.

6. Who is the LADO (local area designated officer)?

6.1 Every local authority has a statutory responsibility to have a Local Authority Designated Officer (LADO) who is responsible for co-ordinating the response to concerns that an adult who works with children may have caused them or could cause them harm. The Local Authority Designated Officer (LADO) works within Children's Services and gives advice and guidance to employers, organisations and other individuals who have concerns about the

¹ See section 6 below to find out more about the role of the LADO.

behaviour of an adult who works with children and young people. Included in this group are volunteers, agency staff and foster carers as well as people who are in a position of authority and have regular contact with children, such as religious leaders, political figures or school governors.

6.2 What is the LADO's role?

- To coordinate the safeguarding and investigative process in response to allegations made against people working with children
- To provide advice/guidance to employers and voluntary organisations to support them through the process of dealing with any allegations and enable them to make sound and proportional decisions
- To liaise with police and other agencies including Ofsted and professional bodies such as the General Medical Council and the Teaching Regulatory Agency
- To monitor the progress of referrals to ensure they are dealt with as quickly as possible, consistent with a thorough and fair process
- To resolve any inter-agency issues
- To collect strategic data and maintain a confidential database in relation to allegations
- To disseminate learning from LADO enquiries through the children's workforce
- To ensure that measures are in place to prevent further harm or abuse and that where required, referrals are made to the appropriate social care team.

6.3 The LADO should be alerted to all cases in which it is alleged that a person who works with children and young people under 18 has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against children, or related to a child
- behaved towards a child or children in a way that indicated they may pose a risk of harm to children.

7. Reporting a Safeguarding Incident

7.1 If you witness a safeguarding or child-protection incident, you must provide a written record of this as soon as possible.

7.2 To complete the written record, update the Nacro's IMS (or OpenHousing in the case of BASS services), with the incident as soon as possible after it has occurred and in any event on the same day to ensure that all incidents are captured across the organisation and that they are monitored and responded to promptly by DSOs, and through the line management reporting structure. Risk assessments should be updated and on closure of cases, a lessons learned undertaken.

7.3 For staff who have no access to the Nacro IMS, you will need to:

- i. complete an electronic report form that can be found [here](#) (and Annex 5) and this must be completed as soon as possible after the incident has occurred and in any event on the same day.
- ii. list the concerns on the Young Person Significant Events Chronology that can be found here (and Annex 6)
- iii. send a copy of the report form to the line manager and the DSO within 24 hours.
- iv. the DSO or line manager will update the Nacro's IMS (or OpenHousing in the case of BASS services), with the incident as soon as possible after it has occurred and in any event on the same day to ensure that all incidents are captured across the organisation and that they are monitored and responded to promptly by DSOs and through the line management reporting structure.
- v. list the concerns on the Young Person Significant Events Chronology that can be found here (and Annex 6)

8. Staff responsibilities for reporting Female Genital Mutilation

8.1 Section 5B of the Female Genital Mutilation Act 2003 and section 74 of the Serious Crime Act 2015 places a mandatory duty on teachers along with social workers and healthcare professionals to report directly to the police where they discover that FGM appears to have been carried out on a girl under 18 or where a girl discloses that she has undergone FGM. This is a personal duty that staff should comply with.

8.2 Hence, if you discover that a young female under 18 has undergone FGM, you must

1. Report this directly to the police
2. Also report this to the DSO and your line manager, and make a written report on the Nacro IMS for safeguarding.

9. Staff responsibilities for reporting 'Children Missing in Education' and children and young people missing from other settings in Housing and Justice

9.1 If you are unable to contact a young person who you are working with, and they have not attended arranged sessions, i.e. education courses, or meetings with you, then you must report this to the DSO and your line manager as soon as possible raise a report on IMS.

10. Staff responsibilities for reporting and dealing with other concerns and issues –

10.1 If there are concerns that the young person is at risk of forced marriage, Child Sexual Exploitation, organised criminal activity such as county lines, sexting, peer on peer abuse, serious violence and other issues, a report should be made immediately to the DSO if they are absent and they, or their parents/carers cannot be contacted to confirm they are safe.

10.2 Further information on guidance and approaching these issues can be found at Annex 1. As a general rule, if you have concerns, you must report this to the DSO and your line manager as soon as possible and raise a report on the IMS.

11. Concerns or Allegations Against Staff or Volunteers

11.1 Make sure you are familiar with the Nacro policy on dealing with Allegations Against Staff.

- i. If you have concerns about the behaviour of another member of staff or volunteer towards a young person, you must report this immediately to the DSO. Note the time and date and any other witnesses
- ii. If you have any concerns about the behaviour of your line manager or a more senior member of staff, you should report this to their line manager, and to the DSO and/or senior safeguarding lead in your Directorate (DSL) if the DSO is not available or you think this is more appropriate to do so. Please note: the member of staff to whom allegations about another member of staff are reported must always be in a more senior position.
- iii. If you have concerns about the behaviour of a trustee, you must report this to the National Strategic Safeguarding Lead or the CEO
- iv. If staff have concerns about the behaviour of any member of staff, especially a senior member of staff or trustee, that appears inappropriate of another but do not feel confident about reporting this behaviour internally, or internal arrangements have been exhausted you should call the LADO (local authority designated officer)
- v. Allegations made against another member or staff, volunteer, partner professional, visitor, contractor etc. should remain confidential and shared only with the DSO or personnel with the appropriate authority to deal with allegations
- vi. You must not on any account challenge, question or investigate, to find more evidence before reporting an adult you suspect of behaving inappropriately towards a young person or young people.

11.2 For more guidance refer to the policy on dealing with Allegations Against Staff.

12. Reporting, Records and Record Keeping

12.1 The key tool used within Nacro for recording safeguarding information is the Nacro IMS or Open Housing for BASS. All concerns and incidents should be recorded on this system.

12.2 The system produces a chronology from the records of concern that have been filed. DSOs should monitor and review the chronologies of the young people they are working with on a regular basis.

12.3 Reports of concerns and/or incidents submitted by staff should include:

- The nature of the allegation, incident or concern
- A description of any visible bruising, other injuries or impacts on the young person
- The young person's account (using his/her own words)
- A clear distinction between what is fact, opinion and hearsay
- Follow-up actions taken as a result of a concern, allegation or incident being filed, should be recorded on the system – this includes where a referral has been made to relevant authorities

- Whether the parent, carer, young person/service user is aware of the referral being made.

12.4 All records must be signed, timed and dated. Members of staff and managers must not:

- Unduly delay reporting the matter by trying to obtain more information
- Destroy any handwritten notes made at the time of the incident in case they are needed by the courts.

12.5 Copies of records and referrals must be kept in line with Nacro's policy and procedures on data protection. This allows for the disclosure of personal information without the consent of the subject in certain conditions, including for the purposes of the prevention and detection of a crime, for example where there is a child protection concern.

12.6 All managers must ensure that data regarding young people is correctly stored and managed in line with Nacro's data protection policy and procedures.

12.7 Access to records online on the IMS will be restricted to those who are authorised to deal with safeguarding matters. Staff will have sufficient access to make reports but not to view any records. Security passwords will be used to ensure appropriate levels of access.

13. Referrals and Child Protection Plans

13.1 The DSO will make a referral to the appropriate, local children's social care team that deal with child protection if there is risk of harm to the young person or the young person has been harmed.

13.2 The young person and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

13.3 A young person will be subject to a child protection plan if they have been identified as having suffered, or likely to suffer, harm.

13.4 Any young person subject to a child protection plan will have a named key worker (usually the social worker) and these details should be listed in the young person's file. All concerns about the young person should be directed to the key worker who is responsible for overseeing the young person.

13.5 Every young person will also have a multi-agency plan drawn up at the first conference held on the young person. Staff must ask for copies of this plan once they become aware that a young person is subject to such a plan.

13.6 If a staff member is involved with a young person who becomes the subject of a case conference or multi-agency meeting co-ordinated by children's services, they will attend the meeting to represent Nacro's involvement with the young person. In this instance, the nominated staff member will be required to produce a report outlining Nacro's involvement

and any recommendations felt necessary in support of the young person. The report will be submitted prior to the conference and will be read by all present, including parents and young people if appropriate. In this respect it may be appropriate to share the report with the parents, carers and young person prior to the meeting. However, the Nacro staff member should seek advice about this from the allocated Social Worker or relevant manager to ensure that it does not compromise the meeting. This must be approved by the Nacro senior Designated Safeguarding Lead (DSL) in the Directorate and/or the senior manager prior to submission. This approval can be delegated to the DSO by the DSL and senior manager.

13.7 If Nacro is working with a young person who is subsequently found to be currently (or recently) the subject of a plan, the member of staff working with the young person must liaise with the appropriate children's services department to request a copy of the plan that was/is in place. Similarly, if any multi-agency meetings have taken place, then copies of the notes of meetings must be requested. Any difficulty in obtaining copies of these documents must be referred to Nacro's area DSO.

14. Nacro's Escalation Procedure

14.1 Whenever there is a concern and it is felt that an allocated social worker does not take on board the concerns that have been highlighted by Nacro or does not act on the referral in a timely manner, the escalation should be followed as below once authorised by the senior Designated Safeguarding Lead (DSL) and senior manager. This approval can be delegated to the DSO by the DSL and senior manager. It is not possible to specify a timeframe to cover every case, however, the escalation should be timely and without unnecessary delay.

- Step 1 – all concerns to be highlighted to the allocated Social Worker and a written record retained
- Step 2 – contact the allocated Social Worker's supervisor verbally again and record in writing in the central record
- Step 3 – contact the allocated Social Worker's line manager and put this in writing to ensure Nacro holds a centralised record
- Step 4 – contact the appropriate senior manager and DSL, for example, in education this will be the Vice or Assistant Principal. Senior managers (or Area/Service Managers in Housing) should be alerted to the situation and will make a decision if it is necessary to inform any regulators, funders or commissioners we may have to the concerns we hold and the issues experienced (please see Annex 9).

15. Handling Information and Confidentiality

15.1 As a member of staff or volunteer, you should maintain an appropriate level of confidentiality with regard to any concerns or disclosures you have reported to the DSO or filed on the IMS about any young person.

15.2 Details should be shared only on a need to know basis with authorised members of staff or external agencies.

15.3 When considering any conflict between data protection or GDPR and giving information, the information must be shared if it is in the interests of safeguarding the young person. In other words, the young person's welfare and safety override data protection/GDPR.

16. Roles and Responsibilities

A. All Staff and Volunteers

To keep young people safe:

1. You should make sure they follow any advice as a result of a risk assessment about how they support and oversee the welfare of any young person.
2. If you are unsure or unclear about what to do, speak to the DSO for advice. The worst thing that you can do is nothing or think that the problem will resolve itself.
3. You should keep a close eye on the relationships between and amongst young people you are working with and how well they are getting on and interacting. You should report any concerns about bullying, peer-on-peer abuse as soon as possible to the DSO and record these on the IMS system.
4. If you see or hear any worrying interactions between a young person and someone they associate with outside the centre, you should log this on the IMS and speak to the DSO. This may be a partner, boyfriend/girlfriend, relative or 'friend' of the young person concerned.
5. You should continue to monitor any young person that you have shared concerns about or who has disclosed a safeguarding issue to you.
6. You should make every effort to provide advice and guidance to young people, especially where they are at risk of harm, of how to keep themselves safe.
7. In education centres, you should help to deliver the safeguarding elements relevant to the curriculum but also as part of the centre's personal, social and health education programme.

B. Nacro National Safeguarding Co-ordinator

Nacro has a Safeguarding co-ordinator who works across the organisation and who is supported by the ELT Strategic Safeguarding Lead. The Co-ordinator is responsible for:

- Ensuring there is a robust policy and procedures framework and reporting structure
- Upholding safeguarding standards at Nacro
- Secretariat for Nacro's National Safeguarding Board
- Providing advice and guidance to DSLs, DSOs and managers
- Ensuring a training framework is in place
- Ensuring Safer Recruitment and single central register is in place and effective
- Using data analysis to identify and respond to trends and issues
- Promote excellent practice
- Formal reporting to the ELT, CEO and trustees.

C. The Role of the Designated Safeguarding Lead (DSL) and the DSO (DS Officer)

There is a detailed outline of the responsibilities of designated safeguarding leads/officer in Keeping Children Safe in Education in Annex B, page 92, and the role outline below should be read in conjunction with this.

There is a single DSL (senior manager) for each Directorate at Nacro and these are included on the chart in Annex 4. Each setting, (Service leads in Housing) has a DSO who can:

- Make sure that staff are well briefed about what to look out for when working with young people
- Ensure any new staff receive training on safeguarding as soon as possible following their appointment and that they understand the safeguarding policies in place
- Make sure that staff know the procedures to follow
- Make sure that staff know: who they are and anyone who deputises for them; the LADO's contact details; contact details for the area DSO and the Nacro lead for safeguarding
- Check/monitor from time to time staff knowledge and understanding of safeguarding, including the range of safeguarding risks that they need to look out for
- Provide ongoing training and briefing on safeguarding issues, new risks, procedures etc.
- Provide advice and guidance to staff on dealing with individual cases and concerns
- Manage referrals to social care and Channel, in the case of radicalisation; this includes following up cases with social care to ensure that appropriate action has been taken
- Provide information to local authority/social care as required for young people they are supporting/monitoring/working with etc.
- Attend, and contribute, to child protection conferences/meetings, multi-agency meetings, TAC/TAF meetings etc.
- Be aware of the additional issues for learners with special educational needs and/or disabilities and ensure staff are aware of these.
- Monitor the risk assessments and any risks identified for young people, ensure that these are completed robustly and that any safeguarding risks identified are managed effectively
- Maintain detailed, accurate written records of concerns and referrals including uploading relevant records of meetings, letters and reports onto the Nacro IMS
- Ensure that systems are secure and that computer access to files is limited to those authorised to have access
- Monitor records regularly especially checking chronologies for patterns and trends and to ensure that actions are being taken where required
- If partner agencies are not following up on concerns where they need to, to make sure the matter is escalated
- Make reports to the area DSO on a regular basis
- Provide information or data which may contribute to reports to Nacro head office
- Ensure that when a young person moves to another provider for services, their records are forwarded appropriately and safely. Where there are major safeguarding concerns, make personal contact with the receiving institution, if possible, to ensure they understand the risks to or from the young person.

D. Area DSOs

In each Directorate, there is a geographical area/cluster nominated area DSO, and in Housing this is the Area Manager. The role of area DSOs includes:

- Maintaining an overview of how effectively safeguarding is being managed within the projects in their area
- Providing support and guidance to project DSOs in managing safeguarding concerns and incidents
- Working with statutory partners in addressing safeguarding concerns and helping to keep young people safe
- Providing feedback and information to DSLs and senior leaders about safeguarding issues, concerns, incidents and their management. This includes producing regular reports to senior managers.

E. Trustees

Trustees have a role in overseeing the quality and effectiveness of safeguarding policies and procedures. Their role includes:

- Ensuring that written policies, procedures and protocols are in place and effectively implemented
- Receiving and reviewing quarterly reports provided by Nacro
- Reviewing and agreeing annual report on safeguarding
- Nominating a Trustee to lead on safeguarding
- Receiving timely information on serious safeguarding incidents or concerns and monitoring how these are dealt with/resolved.
- Contribute to and attend Nacro's National Safeguarding Board
- Overseeing reports to Charity Commissioners
- Carrying out an annual check on Single Central Register.

F. Nacro's National Safeguarding Board

This is a governance meeting of DSLs and DSOs, safeguard trustee and other key operational and corporate staff. It is chaired by the Executive Strategic Lead. It has a resident external safeguard expert to guide and support. It meets five times a year and considers performance, practice and staff development and training. Terms of reference can be found [here](#) and on One Space.

17. Staff Dos and Don'ts

Staff must:

- implement the Safeguarding of Children Policy and Procedures at all times

Staff must never:

- engage in inappropriate rough, physical games including horseplay with young people
- allow or engage in inappropriate touching of any kind. The main principles of touch are:
 - touch should always be in response to the young person's needs
 - touch should always be appropriate to the age and stage of development of the young person
 - touch should always be with the young person's permission
- do things of a personal nature for a young person that they can do for themselves or that their parent can do for them
- physically restrain a young person unless the restraint is to prevent physical injury of the young person/other young people/visitors or staff/yourself. In all circumstances physical restraint must be appropriate and reasonable, otherwise the action can be defined as assault.
- make sexually suggestive comments to, or within earshot of, a young person
- have children on their own in a vehicle
- where circumstances require the transportation of young people in their vehicle, another member of staff/ volunteer must travel in the vehicle. Also, it is essential that there is adequate insurance for the vehicle to cover transporting young people as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a young person on their own, it is essential that another leader and the parent is notified immediately.
- take a young person to the toilet unless another adult is present or has been made aware
- spend time alone with a young person on their own, outside of the normal tutorial/classroom situation. If you find you are in a situation where you are alone with a young person, make sure that you can be clearly observed by others.
- engage in a personal relationship with a young person, or a child who becomes a student or service user, beyond that appropriate for a normal professional relationship
- take photographs of a young person on any personal camera, laptop, computer or mobile phone.

17.1 Staff who breach any of the above may be subject to the Disciplinary Procedure.

If an allegation against a member of staff has occurred, then this must be reported and an investigation may be carried out in accordance with the procedure for dealing with such allegations against staff.

Section 2 – Background Information and Further Guidance

18. What is Safeguarding?

18.1 Keeping Children Safe in Education defines safeguarding as:

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

18.2 There are four types of abuse as shown in the adjacent diagram.

18.3 Training must cover neglect, physical, emotional and sexual abuse and the signs to look out for.

18.3 In addition to the four types of abuse, young people need to be protected from a wide range of additional safeguarding risks.



18.4 These include:

- peer-on-peer abuse, this includes sexual violence and harassment perpetrated by pupils against other pupils
- radicalisation and/or extremist behaviour
- child sexual exploitation and trafficking
- child criminal exploitation, including county lines
- serious violence
- gender-based violence/violence against women and girls
- upskirting
- issues that may be specific to a local area or population, for example gang activity and youth violence
- domestic abuse
- female genital mutilation
- forced marriage
- fabricated or induced illness
- poor parenting
- homelessness
- so-called honour-based violence

- risks linked to using the internet and social media, including online bullying
- being groomed online for exploitation or radicalisation
- risks of accessing and generating inappropriate content, for example 'sexting'
- teenage relationship abuse
- racist, disability and homophobic or transphobic abuse
- bullying, including online bullying and prejudice-based bullying
- substance misuse
- self-harming and other risky behaviours
- financial abuse
- psychological abuse
- contextualised safeguarding.

18.5 It is important to be aware that young people with special educational needs and/or disabilities are particularly vulnerable to abuse. Therefore, additional support and care needs to be in place to keep this group of young people safe. Support should include advice and guidance on how they can stay safe. This advice and guidance should to be communicated appropriately for their needs, for example, through the use of social stories.

Please see Annexes 1 and 2 for further guidance on approaching these issues.

19. Grooming

19.1 This is a process by which adults and other young people, use to establish control over a young person with the ultimate purpose of exploiting them. The grooming can be for:

- Sexual exploitation
- Criminal exploitation
- Fundamentalism and terrorism.

19.2 The process of grooming for sexual exploitation involves:

- Targeting the victim – often someone who is vulnerable, lonely, emotionally needy, lacking in confidence or self-esteem
- Gaining the victim's trust – groomers are very patient and invest a great deal of time in gaining trust. They have the long-term gain in mind.
- Filling a need – making the victim feel better about themselves; giving attention and also gifts and presents
- Isolating the victim – creating situations where the victim is alone with the groomer and, little by little, cutting the victim off from friends and family
- Sexualising the relationship – this occurs where the groomer has created sufficient emotional dependency so that the victim does not resist/cannot resist
- Maintaining control - this is possible because through the processes above, the victim no longer trusts anyone else and trusts the groomer above all, which enables the groomer to manipulate the victim and control them completely.

19.3 Grooming for criminal exploitation or into fundamentalism is not very different. These also involve careful targeting, gaining trust, isolating the victim, filling a need, providing propaganda to make the victim willing to commit crimes, includes desensitising them to violence, and maintaining control.

19.4 Those individuals involved in grooming children are adept at convincing adults around them, and the young people they are grooming, that they mean no harm and that they are caring people.

19.5 Young people involved in grooming may be both perpetrators and victims themselves, i.e. they are being co-coerced, bribed or threatened to groom other young people so that they can be sexually or criminally exploited, or radicalised. Therefore, they also need to be supported.

20. Legislation and Key Documents

20.1 The legislative framework underpinning safeguarding of children and young people includes:

- The Children Act 1989
- The Children Act 2004
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- The Children and Social Work Act 2017
- United Nations Convention on the Rights of the Child
- Human Rights Act 1998
- The SEN Code of Practice 2014
- The Equality Act 2010
- Prevent Strategy 2011
- Counter Terrorism and Security Act 2015
- Rehabilitation of Offenders Act (1974)

20.2 Child or children means anyone under the age of 18.

20.3 Key documents

- Working Together to Safeguarding Children (DfE updated February 2019)
- Keeping Children Safe in Education (DfE September 2019)
- Inspecting safeguarding in early years, education and skills settings –(Ofsted Updated May 2019)
- Prevent duty guidance for England and Wales (Gov.uk 2019)
- Any local policies i.e. Local Authority policies that might be relevant.

21. Working in Partnerships with Others

Working together

21.1 Safeguarding and promoting the welfare of young people/service users – and in particular protecting them from significant harm – depends on effective joint working between agencies and professionals that have different roles and responsibilities.

The three key statutory partners we must work closely with are:

- The local authority children's social services – this includes the LADO
- The Police
- Health partners.

21.2 In order to ensure and promote effective joint working, there need to be constructive relationships between individual workers, promoted and supported by those in the most senior roles within Nacro and across other organisations that Nacro works with. In order to do this individual service delivery projects across Nacro must establish links with other agencies – community or statutory – so as to ensure effective practices. This will include having named contacts, joint working protocols, information sharing protocols and presence on local forums. The Local Safeguarding Partnership for each area will be able to offer assistance in making the right contacts.

21.3 Often, working partnerships with local voluntary sector organisations is an effective way to secure and provide tailored support to young people at risk of harm or who have experienced harm.

Working with Parents and Carers

21.4 It is important to recognise the responsibility of the parents and carers for the protection of the young person that Nacro comes into contact with. This might include:

- Knowing who the parents/carers or other with parental responsibility of all the young people are and having a record of contact details
- Assisting parents and carers to ensure that they can identify staff working for Nacro
- Obtaining parental consent for activities using the appropriate Nacro standard from
- Ensuring that communications with parents take account of language or communication differences
- Advise parents and carers about Nacro's complaints process and how to use it
- Conducting periodic surveys about specific issues with parents and carers using Nacro's service involvement feedback process
- Involving parents and carers in developing policies that promote safeguarding through Nacro's service user's own involvement process
- Providing support and guidance to parents and carers and signposting them to services where they too need help and support.

Involving Young People and children

21.5 It is just as important to establish the active involvement of young people. This will include the following:

- Supporting young people so that they know who they can go to if they are worried or concerned
- Involving them in developing and improving relevant safeguarding activities through our service user involvement processes
- Really listening and taking account of what young people say or communicate using Nacro's service involvement feedback processes and one-to-one meetings
- Supporting young people with other languages or communication needs to have their views taken into account
- Displaying Nacro safeguarding posters and information leaflets to encourage an open culture of talking about feeling safe and secure.
- Working with young people so they understand that certain behaviour will not be tolerated, i.e. bullying, racism, sexism, homophobia etc.

22. Early Help

22.1 The terms 'prevention' and 'help and intervention' are often used interchangeably across disciplines and in practice there will often be an overlap. An overview of how we use and will apply them in Nacro is outlined below:

- **Prevention** is essentially a broad set of universal and additional support that aims to prevent problems by building resilience, increasing protective factors and reducing risk factors facing young people/service users and their families.
- **Early Help** – also referred to as early intervention, includes:
 - Help provided in critical early years of a child's life, when fundamental building blocks of future development are laid, and to
 - Help through a young person/service user's and families' life to respond, as soon as possible, when difficulties emerge in order to prevent problems from becoming entrenched or escalating.

22.2 Nacro are adopting the Centre for Excellence and Outcomes in Children and Young People's Service (C4EO)² definition of early help which is detailed below:

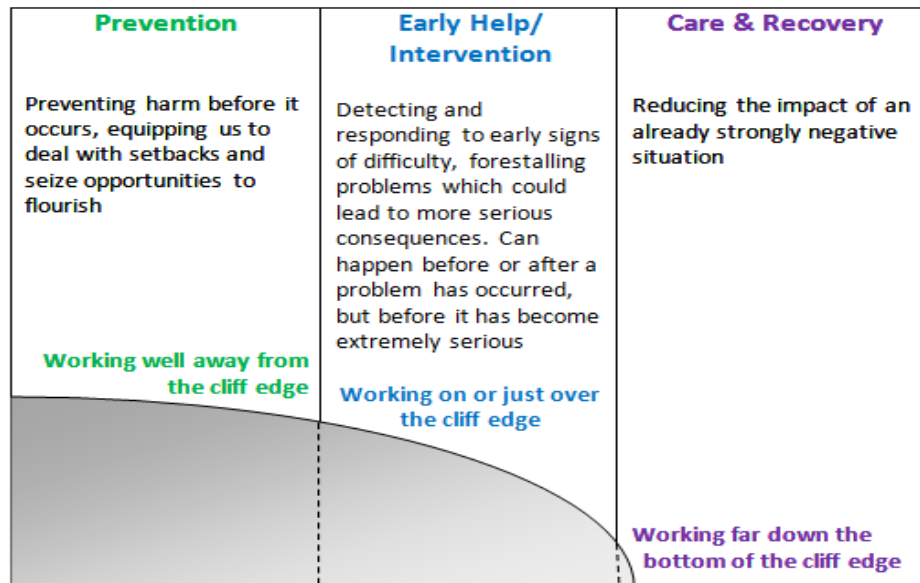
Intervening early and as soon as possible to tackle problems emerging for children, young people and families with a population most at risk of developing problems. Effective intervention may occur at any point in a child or young person's life.

22.3 The UK Early Action Taskforce have provided a definition of delivery across prevention, early help and building a system that is able to:

² Centre for Excellence and Outcomes in Children and Young People's Service: <http://www.c4eo.org.uk/>

- Excavate and uproot the causes of problems
- Invest in the quality of life now and in the young person's future, rather than store up even greater social, health and environmental problems
- Build readiness and invest in people's capabilities before they need welfare, rather than stepping in when people are not able to provide for themselves.

Definition of Delivery (UK Early Action Taskforce)



23. Safer Recruitment

23.1 One of the ways to keep young people safe is to make sure that the recruitment and selection process is carried out diligently so that anyone who may be unsuitable to be around children and young people is not appointed. This process is called 'safer recruitment' and involves a full range of checks, including DBS (Disclosure and Barring Service) check where necessary and proportionate to the role, to be made before anyone is employed. Nacro adheres to the safer recruitment practice as set out in Keeping Children Safe in Education (DfE), depending on the post and its eligibility for DBS and at which level.

23.2 It is important to note that those who wish to abuse children and young people and groom them often seek out work, including voluntary work, in organisations that give them easy access to children and young people.

23.3 All employees and volunteers who will be working in roles that bring them into regular contact with young people will be asked to undergo safer recruitment checks before being allowed to work within the organisation. All of Nacro's recruiting managers should have completed online or in house safer recruitment training.

23.4 All prospective staff or volunteers must provide two referees from different employers. The referees must be able to make a clear statement that they know of no reason why the prospective employee is not suitable to work with children. In addition, they must also declare that they know of no allegations made against the employee in relation to working with children and young people in the past or currently.

23.5 All prospective employees and volunteers must be able to explain satisfactorily any gaps in their work history.

23.6 As part of the safer recruitment employment checks, prospective employees must:

- Show current photographic ID – passport or current driving licence
- Provide documents which confirm their address
- Confirm right to work in the UK
- Show copies of certificates to confirm their qualifications

23.7 In addition, where relevant, a police check may also be requested from a police force in another country. The prospective employee's mental and physical fitness for work must also be checked.

23.8 If a DBS check is returned and it provides details of any prior offence, conviction, caution, or reprimand (other than parking or speeding convictions) we undertake a written risk assessment to support the final decision on whether any job offer stands or should be withdrawn.

23.9 No employee is allowed to work in positions where they have direct and/or regular contact with young people until all the recruitment checks have been completed. If they are to start work in a supervised environment, and do not have access to young people or young people's data in this environment when their substantive role is to have this, then a risk assessment must be done. All risk assessments must then be jointly reviewed by The Recruitment Manager and the Head of Safeguarding or the DSL within the directorate concerned. It would be only in exceptional circumstances that an employee would begin before DBS clearance.

23.10 The DBS numbers of staff are collected by HR and are recorded on its single central record of safer recruitment checks, alongside safeguarding training information. Child or children means anyone under the age of 18. This is reviewed annually by the Safeguarding Trustee as well as at least annual reviews by Nacro Safeguarding Co-ordinator.

24. Training and Professional Development

24.1 Nacro has a comprehensive training schedule which can be found on One Space Safeguarding pages. . The induction for all staff no matter what their role will provide training on safeguarding to all new employees and volunteers who are working with young people as soon as possible after they join the organisation. The induction face to face and on-line training on ILearn covers:

- Understanding safeguarding and child protection

- The range of risks that young people face, including risks when using the internet and peer-on-peer abuse
- Information about role boundaries and professional propriety
- Individual safeguarding responsibilities, including what to do if concerns about a young person's welfare arise and whistle blowing
- the name, contact details and responsibilities of key safeguarding staff as per the NACRO structure chart in Annex 4
- The name and contact details of the LADO in the area where you are working.

24.2 All new staff, Trustees and volunteers will be provided with the safeguarding policy and associated codes of conduct. They must sign to say they read and understood the content of these. They will also be asked to complete a training needs analysis for future safeguarding/role related training.

24.3 Where relevant, new staff, Trustees and volunteers will be asked to read section 1 of Keeping Children Safe in Education. Staff and Trustees must sign to say that they have read this.

24.4 Line managers must ensure that they and the staff they manage are familiar with the following Nacro policies and procedures (which are available via OneSpace):

- *Recruiting Safely in Nacro*
- *Dealing with Allegations against staff*
- *Code of Conduct for Nacro Employees*
- *Disciplinary Procedure*
- *Dignity at Work Policy*
- *Equality and Diversity Statement*
- *Data Protection Policy*
- *Health and Safety Policy*
- *Whistle-blowing Policy*
- *Prevent Policy*
- *Incident Policy*
- *Substance Mis-use policy*
- *Modern Slavery statement and policy*

24.5 The safeguarding training will be refreshed annually at Directorate level.

24.6 DSOs will provide regular briefings and training to staff to update them on any new requirements from government or information that emerges about local risks to young people.

24.7 Nacro will ensure that DSOs and DSLs have Level 3 safeguarding training, and that this is renewed every three years as good practice measure.

Annexes

Annex 1 - Concerns and issues

1. Peer on Peer Abuse:

Nacro recognises safeguarding issues can manifest themselves via peer on peer abuse and that children sometimes display abusive behaviour themselves and that such incidents or allegations must be referred on for appropriate support and intervention. Such abuse will not be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. This abuse could for example include:

- i. Bullying (including cyberbullying)
- ii. Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- iii. Sexual violence, such as rape, assault by penetration and sexual assault
- iv. Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- v. Upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (this is now a criminal offence)
- vi. Sexting (also known as youth produced sexual imagery)
- vii. Initiation/hazing type violence and rituals.

2. Child on Child Sexual Violence and Sexual Harassment:

All reports of child on child sexual violence and sexual harassment will be taken seriously. The victim will be made aware of this, along with reassurance that steps will be taken to keep them safe and well supported. Reports of child on child sexual violence and sexual harassment should be reported to the Designated Safeguarding Officer, in line with local procedures for all other safeguarding concerns. As with all other reports of a safeguarding nature, confidentiality cannot be promised at this stage. Local procedures for referring concerns to appropriate external agencies also apply, in order to keep the victim safe. The Designated Safeguarding Officer will act as the main point of contact for Nacro with Police, Social Care and any other services supporting the victim. When dealing with allegations and incidents of sexual violence and sexual harassment, it is recognised that some situations are statutorily clear:

- i. A child under the age of 13 can never consent to any sexual activity
- ii. The age of consent is 16
- iii. Sexual intercourse without consent is rape
- iv. Rape, assault by penetration and sexual assault are defined in law
- v. Creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting). This includes children making and sharing sexual images and videos of themselves.

Nacro will always respond if informed that young people have been involved in 'sexting' (youth produced sexual imagery). The UK Council for Child Internet Safety (UKCCIS) guidance, "Sexting in schools and colleges: responding to incidents and safeguarding young people" will be used to guide Nacro's response on a case by case basis. The key points being:

- i. Inform the DSO as soon as possible
- ii. Support the victim as appropriate and in accordance with their best interests
- iii. Inform all parents/carers of involved children unless by doing so you put a child at risk
- iv. Images will not be viewed by Nacro staff
- v. If Nacro is to deal with the matter, involve parents/carers in ensuring the images are deleted
- vi. If there is evidence of exploitation or the targeting of a vulnerable young person, inform the Police.

3. Children Missing from Education:

Nacro recognises the entitlement that all children have to education and will work closely with the local authority to share information about students who may be missing out on full time education or who go missing from education.

4. Child Sexual Exploitation:

This is a form of sexual abuse where children are sexually exploited for money, power or status. It occurs where an individual or group takes advantage of an imbalance or power to coerce, manipulate or deceive a 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. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Staff training includes raising awareness of this issue and any concerns are passed to the Designated Safeguarding Officer who will make a risk assessment and refer to Local Authority First Response Children's Duty/MASH if appropriate.

So-called 'honour-based' violence: (HBV): encompasses crimes which have been committed to protect or defend the so-called "honour" of the family and/or the community, including Female Genital Mutilation (FGM) (see point 9 below), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and concerns will be passed to the Designated Safeguarding Officer for onward referral as required.

5.8 Private Fostering Arrangements: Where a child under 16 (or 18 with a disability) is living with someone who is not their family or a close relative for 28 days or more, staff inform the Designated Safeguarding Officer so that a referral to Children's Social Care for a safety check, can be made. (A close relative includes step-parent, grandparents, uncle, auntie or sibling).

5. Looked after children and previously looked after children:

Children that fall into this category are either currently in the care system, or will have previously been in the care system. Nacro will ensure that:

- i. Identify an appropriately trained staff member to take the lead responsibility in promoting the educational achievement of students within this cohort
- ii. Ensure that relevant staff have the information, skills, knowledge and understanding to keep looked after children safe
- iii. Ensure they participate in multi-agency working to safeguard students from within this cohort.

6. Child criminal exploitation or County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. The key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. In these instances, a referral to the National Referral Mechanism will be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- i. can affect any child or young person (male or female) under the age of 18 years
- ii. can affect any vulnerable adult over the age of 18 years
- iii. can still be exploitation even if the activity appears consensual
- iv. can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- v. can be perpetrated by individuals or groups, males or females, and young people or adults
- vi. is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

7. Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from 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 with criminal networks or gangs.

8. Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning

disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. All concerns with regards to forced marriage should be reported to the DSO in line with Nacro's procedures. The Designated Safeguarding Officer will liaise with external agencies as appropriate to support the victim.

It is important to make a clear distinction between an arranged marriage, to which both parties give their free consent, and a forced marriage. The former is a perfectly legitimate practice in many cultures around the world, while the latter is a criminal offence.

9. Female Genital Mutilation (FGM)

Section 5B of the Female Genital Mutilation Act 2003 and section 74 of the Serious Crime Act 2015 places a mandatory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18 or where a girl discloses that she has undergone FGM. Nacro's response to FGM will take into account the government guidance, "Multi-agency statutory guidance on female genital mutilation" April 2016. Staff will also follow the established safeguarding procedure by reporting any such concerns to the Designated Safeguarding Officer and a report must also be made to the Police. There will be a considered safeguarding response towards any girl who is identified as being at risk of FGM (e.g. there is a known history of practising FGM in her family, community or country of origin) which may include sensitive conversations with the girl and her family, sharing information with professionals from other agencies and/or making a referral to Children's Social Care. If the risk of harm is imminent there are a number of emergency measures that can be taken including police protection, an FGM protection order and an Emergency Protection Order.

10. Contextual Safeguarding

'Contextual Safeguarding has been developed by Carlene Firmin at the University of Bedfordshire over the past six years to inform policy and practice approaches to safeguarding adolescents. 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. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.' Contextual Safeguarding Network: <https://www.csnetwork.org.uk/en/about/what-is-contextual-safeguarding>

In the context of Nacro's work, staff, and DSOs in particular, need to be aware of the wider relationships of young people, who they associate with outside the home and the environments they frequent, and be alert to the risks that these relationships and/or environments may pose in terms of abuse, particularly peer-on-peer abuse.

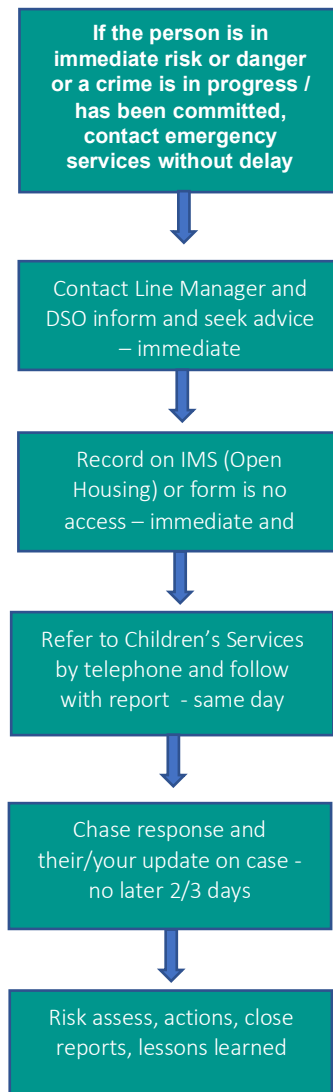
Annex 2 - Types of abuse and indicators

More information on the types and indicators of abuse is set out below. This list is not exhaustive.

Type of abuse	Who it affects	Physical indicator	Behavior indicator
Physical	Children, young people and adults at risk	Unexplained bruising, marks or injuries Bruises which reflect hand marks Cigarette burns Bite marks Broken bones Scalds	Fear of the perpetrator being contacted Aggressive or angry outburst Running away Fear of going home Flinching Depression Keeping arms/legs covered Reluctance to change clothes e.g. wearing long sleeves in hot weather Withdrawn behaviour
Emotional	Children, young people and adults at risk	Developmentally delayed Sudden speech disorders Loss of appetite/loss of weight Disturbed sleep Starting to drink alcohol or take substances or increased substance abuse	Neurotic behaviour e.g. hair twisting, rocking Unable to play/take part Fear of making mistakes Sudden speech disorders Self-harm or mutilation Fear of parents being contacted
Neglect	Children, young people and adults at risk	Constant hunger, stealing food Unkempt state Weight loss/underweight Inappropriate dress Untreated physical illnesses Constantly tired	Withdrawn Stealing food or other necessities Looking in bins for food or taking others' leftover food Making excuses for not going out with friends or peers or wanting to attend extra-curricular activities
Sexual – including CSE	Children, young people and adults at risk. (It is rare to see indicators of this nature in adults, however there are often halted discussions which are precursors to disclosure)	Pain/itching in the genital area Bruising/bleeding near genital area STIs Vaginal discharge/ Infection Stomach pains Discomfort when walking/sitting Pregnancy	Sudden change in behaviour Nightmares Unexplained sources of money Sexual drawings/language Bed wetting Self-harming behaviour Secrets which cannot be told to anyone Behaving beyond their age Going missing

Criminal gangs	Children, young people and adults at risk	Money, clothes or accessories which they are unable to account for Appear more tense and watchful Tired	Going missing and travelling to seaside or market towns An increase in possession with intent to supply offences outside your area New Associates who are unfamiliar or known to be involved in criminal activity Being secretive.
Discriminatory abuse	Children, young people and adults at risk	Possible signs of physical abuse such as bruising and other marks or signs of physical abuse Signs of stress or distress even	Becoming withdrawn or aggressive Loss of confidence Low self-esteem Lack of interest in participating in activities Attendance drops if in an educational institution or lack of attendance at arrangement meetings to check on welfare and progress Performance drops Looks unhappy and/or uncomfortable
Radicalisation or extremism – this is any belief or ideology which advocates, or promotes violence and includes extreme religious beliefs, far right extremism as well as animal or climate extremists.	Children, young people and adults at risk	Change in dress/appearance Change in who they associate with or their friendship group	Isolating themselves from family and friends Feeling persecuted or that their life chances have been taken away by specific groups Embracing conspiracy theories Increased levels of anger or aggression Unwilling or unable to listen to the views of others Disrespectful attitude towards others not of the same faith or because of their ethnicity/faith/religion Spending a lot of time on the internet or mobile phone Accessing particular websites/internet that promote extremism Change in the language they use.

Annex 3 – Simple Flowchart to illustrate response to safeguarding concerns

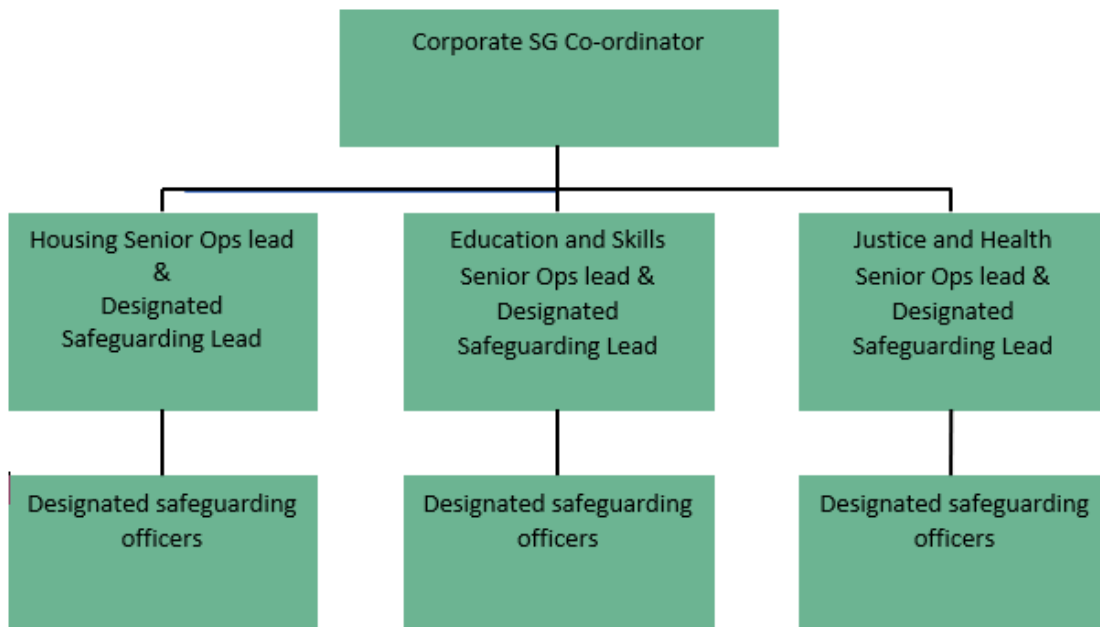


Annex 3a – Flowchart to illustrate response to safeguarding concerns

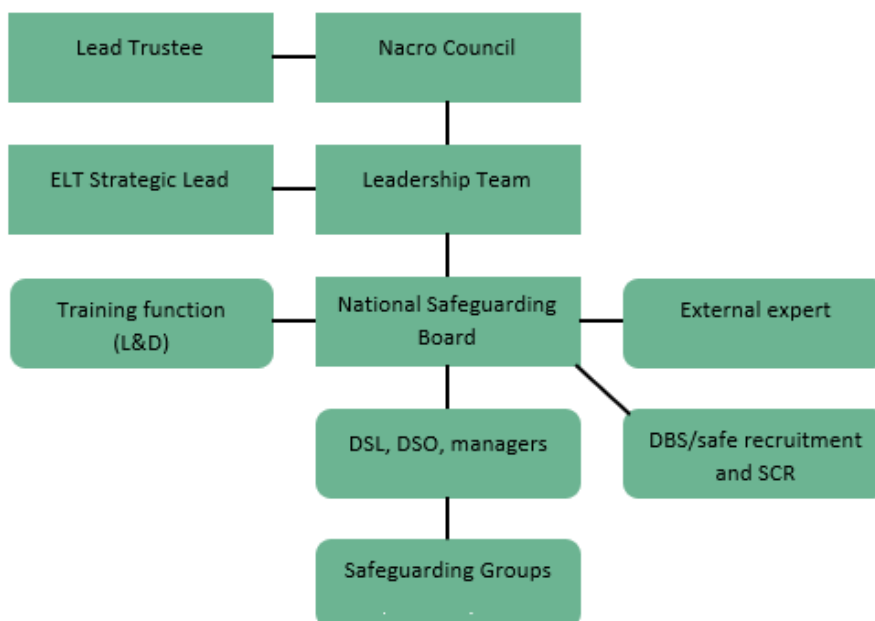


Annex 4 - The Nacro Safeguarding Structure chart

Each directorate has an operational lead (or Designated Safeguarding Lead) and designated safeguarding officers (DSOs) as deputies. There is also a corporate safeguarding co-ordinator and ELT lead. This does not alleviate responsibility for safeguarding from managers.



Safeguarding Governance Structure



Annex 5: Child Protection Report Form³

Child Protection: Initial Report Form

This form is to be completed for any incident, complaint, observed behaviour, activity or concern that would suggest a young person/service user (0-18 years) may be in need of safeguarding support services.

Section 1:			
This section is to be completed by the person identifying the concern			
Scheme / Project Name	Click here to enter text.		
Address incl postcode	Click here to enter text.	Telephone Number	Click here to enter text.
Date of incident/concern arising	Click here to enter a date.	Time of incident /concern	Click here to enter text.
Details of young person / service user who is subject of concern			
Name	Click here to enter text.	Address incl postcode	Click here to enter text.
Date of Birth	Click here to enter a date.	Ethnicity	Click here to enter text.
Parental responsibility	Click here to enter text.		
Names and details of other people involved in the incident	Click here to enter text.		
Details of incident and brief statement of concern: <i>(to include information from the young person/service user and/or the person reporting the incident/concern)</i>			
Click here to enter text.			
Immediate action taken/needed:			
Click here to enter text.			
Analysis of concern (what are the short/long/term implications to the young			

³ This form is completed only if you have no access to the Nacro IMS or BASS OpenHousing

person/service user of this concern?):			
Click here to enter text.			
Category of concern			
Physical	<input type="checkbox"/>		Sexual <input type="checkbox"/>
Neglect	<input type="checkbox"/>		Emotional <input type="checkbox"/>
Domestic Violence	<input type="checkbox"/>		Harassment <input type="checkbox"/>
Bullying	<input type="checkbox"/>		Other <input type="checkbox"/>
Action taken as a result of concern (to include immediate actions):			
Click here to enter text.			
Follow-up action:			
1. Child protection/safeguarding referral			<input type="checkbox"/>
2. Monitoring (commence or continue significant events chronology)			<input type="checkbox"/>
3. CAF completed			<input type="checkbox"/>
4. Log incident on Incident Management System (IMS)			<input type="checkbox"/>
<u>Important</u> – A copy of this form to be sent within one working day to:			
Line manager:	Click here to enter text.	Project designated safeguarding officer:	Click here to enter text.
Name:			
Click here to enter text.			
Date:	Click here to enter text.	Time:	Click here to enter text.
Section 2: This section to be completed only if a referral has been made to a social care department			
Date of Referral	Click here to enter a date.	Time of referral	Click here to enter text.

Children's services Department Office address:	Click here to enter text.
Tel no:	Click here to enter text.
Email:	Click here to enter text.
Name of worker in the children's services department who took the referral:	Click here to enter text.
Has referral been followed up in writing? <i>(This must be within 48 hours)</i>	Yes <input type="checkbox"/> No <input type="checkbox"/>
If no, please give reasons: Click here to enter text.	
Has an initial assessment/referral/TAC form been sent to children's services?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Have all appropriate staff been informed of the referral and its implications? If yes, indicate who has been informed If no, please give reasons	Click here to enter text. Yes <input type="checkbox"/> No <input type="checkbox"/>
Has the risk assessment been reviewed and updated?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Has the support plan been reviewed and updated?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Name and signature of person making this statement:	Click here to enter text.
Date: Click here to enter a date.	Time: Click here to enter text.

Send updates of this completed form to your Designated Safeguarding Officer and Faculty Manager/Project Manager

Annex 6: Significant Events Chronology⁴

Nacro's managers and staff must use the significant events chronology to record basic factual events which will help build a picture of both what is happening for a young person/service user and the impact of those events.

The chronology must be held at the front of the young person/service users file, and basic factual events such as those outlined below should be recorded.

If it is necessary to document fully all the information as the chronology requires only that the basic factual event be recorded. It will be important each time an entry is made for the worker to review previous entries to ensure that no emerging concerns are being ignored and there has been full consideration of the risk of significant harm.

Please record service user information in date order of significant events and observations. Events should be recorded bearing in mind the impact of any incident that could affect the welfare, health and well-being of a young person/service user or increase the risk of significant harm to that young person/service user.

Events to be recorded should cover the following:

- New additions/changes to the family, i.e. birth of siblings, changes of partners of parents
- New relationships/friendships (to family OR individual young person/service user)
- Change of address
- Change of GP
- Health problems of household/family members
- Illness
- Mental health issues
- Accidents
- Incidents (including self-harming)
- Absenteeism
- Withdrawal from services (other agencies)
- Unemployment
- Offending/reoffending
- Use of drugs/alcohol
- Appearance

This list is not exhaustive, and any other event not listed should also be recorded if a concern is raised. This information should be documented accurately and concisely as it may be shared with other agencies, used in case conferences and/or a court of law.

⁴ The form below is to be used only when staff have no access to the IMS or BASS OpenHousing.

Significant Events Chronology⁵

Name:	Click here to enter text.	Address:	Click here to enter text.
Date of Birth:	Click here to enter a date.	Family Members:	Click here to enter text.
Next of Kin name and contact details:	Click here to enter text.	GP Address and contact details:	Click here to enter text.
Social Worker and contact details (tel. no./email):	Click here to enter text.	Other agency involvement and contact details (tel. no./email):	Click here to enter text.

Date	Significant Event	Comments/Actions	External Agency - Contact notes	Where else recorded	Print name
Click here to enter a date.	Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter a date.	Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter a date.	Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.

⁵ This form is to be used only when staff have no access to the IMS or BASS OpenHousing.

Annex 7: Radicalisation and Extremism Referral Process

Further education providers are required to safeguard and promote the welfare of children, young people and vulnerable adults. Nacro should also follow this guidance for all other Directorates.

What to do if you are concerned a child, young person or young adult is at risk of radicalisation.

SUSPECT	<p>If a staff member suspects an individual is at risk of radicalisation, this should be raised with the Designated Safeguarding Officer and line manager. A Prevent Referral form will need to be completed by the member of staff raising the concerns (Prevent Referral forms are located on OneSpace).</p> <p>Facts and opinions should be clearly identified.</p>
REPORT	<p>Staff should not investigate concerns or allegations themselves, but should report them immediately to the DSO and line manager.</p> <p>In the absence of the DSO and line manager, the concern should be reported to senior Designated Safeguarding Lead for their Directorate</p> <p>The designated person will make a referral in accordance with Government and Local Authority Guidelines.</p>
SECURE	<p>All documents will be retained in a 'Prevent Duty' file, separate from the Individual's main file.</p> <p>The 'Prevent Duty' file will be kept securely as per other safeguarding documentation and only accessible by those staff engaged in managing the case</p> <p>Further information in relation to radicalisation can be located within the British Values & Challenging Radicalisation, Extremism and Terrorism Policy.</p>

Annex 7 Channel Referral form - Restricted when Complete

Prevent 'Channel' Referral Form			
Referral Details			
Name:	Click here to enter text.		
Alternative name:	Click here to enter text.		
Date of Birth:	Click here to enter a date.	Gender:	Click here to enter text.
Address:	Click here to enter text.		
Nationality:	Click here to enter text.	Ethnicity:	Click here to enter text.
Language (first):	Click here to enter text.	Faith:	Click here to enter text.
School/college or Occupation/workplace:	Click here to enter text.		
Family or Carer details:	Click here to enter text.		
Referring Agency Details			
Referral Author and Contact Details:	Click here to enter text.		
Agency:	Click here to enter text.		
Date of Referral:	Click here to enter a date.		
Vulnerability Factors			
Factor	Notes	Y/N	
Faith/Ideology	e.g. Concerning comments relating to faith or ideology, or association with extremists	Choose an item.	
Social Mobility	e.g. poverty, lack of education or employment, immigration issues	Choose an item.	
Physical or mental health	e.g. Disability, learning difficulties, mental health concerns	Choose an item.	
Risk or harm factor	e.g. threat posed by family member (DV issues), victim of hate crime or personal attack	Choose an item.	
Criminal Activity or association	e.g. involved in criminal activity or associating with known criminals	Choose an item.	
Isolation or exclusion	e.g. lack of social activity, isolation, absent peer	Choose an	

	groups	item.
Other factor	Any other factors Please specify:	Choose an item.
Is the individual aware of the referral?	Although it is not necessary or always beneficial to notify an individual, whether they are aware is important.	Choose an item.

Restricted when Complete

Summary reason for referral
Outline main reasons for referral: Click here to enter text.
Existing agency involvement
Outline any existing agency involvement (that you are aware of) e.g. CAF, MAPPA, Safeguarding: Click here to enter text.
Any other relevant information
Click here to enter text.
<p>Notes: A Channel referral places an individual into a multi-agency assessment and support process which aims to reduce their vulnerability to extremist related activity. Each referral is screened for suitability. Further information will be sought from partner agencies before any support mechanisms are put in place. Your referral is important and does not mean an individual is a terrorist or will become a terrorist, only that vulnerabilities have been identified which require further investigation or help. Please provide as much detail as possible.</p> <p>If you have any questions or concerns please do not hesitate to discuss with your Prevent Lead, your safeguarding lead, or local Police Prevent Engagement Officer.</p>

Annex 9 - Reporting to Commissioner, Regulators and Funders

Nacro has a legal responsibility to report serious incidents to various commissioners and funders. These are usually co-ordinated by the Head of Governance, with the exception of reports to the LADO. Please see advice below.

LADO (cross directorate)

If you answer yes to any of the following a referral to the LADO is necessary

- behaved in a way which has harmed or might harm a child
- possibly committed a criminal offence against a child
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children

Responsibility – Reported coordinated by Designated Safeguarding Lead

Charity Commission (cross directorate)

If you answer yes to any of the following this must be reported to the Charity Commission without undue delay. This may be before an investigation has been completed if it is considered that the matter is of the appropriate severity, decided at meeting above).

- A beneficiary or other individual connected with the charity's activities has/alleges to have suffered serious harm
- Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary whilst under the charity's care
- The Chief Executive of the charity has been suspended pending the outcome of an investigation into their alleged sexual harassment of a fellow member of staff
- Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer
- A staff computer is found to contain images of child pornography
- An internal investigation has established that there is a widespread culture of bullying within the charity
- A beneficiary or individual connected with the charity's activities has died or been seriously harmed; a significant contributory factor is the charity's failure to implement a relevant policy
- Charity failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from holding that position
- Repeated medication errors to beneficiaries in a care home indicating a systemic problem
- Charity discovers that an employee or volunteer coming into contact with children or at risk adults is on the sex offenders register

Responsibility – Reported coordinated and filed by Head of Governance

Disclosure and Barring Service (cross directorate)

If you answer yes to ALL of the below, a referral to the DBS is necessary:

- Was the person working in regulated activity?
- Has the internal investigation been completed?
- Has the investigation found the allegations to be true?
- Has the person been removed from regulated activity (through instruction or their own choosing)/Are there safeguarding concerns about the person?

Responsibility – Reported coordinated and filed by Head of Governance

Education and Skills Funding Agency (incidents within Education only)

If the answer is yes to any of the following then ESFA must also be notified

This may be before an investigation has been completed if it is considered that the matter is of the appropriate severity, decided at meeting above).

- A safeguarding concern related to sexual violence has been referred to the LADO and/or the police
- An allegation of abuse has been made against a teacher or member of staff

Responsibility – Reported coordinated and filed by Head of Governance

Teaching Regulatory Authority (incidents within Education only)

If you answer yes to ANY of the following the TRA must be notified. This may be before an investigation has been completed if it is considered that the matter is of the appropriate severity, decided at meeting above).

- Does the incident involve a teacher (rather than other staff in Education)?
- Is the misconduct serious enough to potentially result in a prohibition order?
- Has the teacher been dismissed for serious misconduct?

Responsibility – Reported coordinated and filed by Head of Governance

Ofsted (Education only)

Director of Education to decide whether reportable.

Individual Contracts (cross directorate)

Contracts should be checked for what the individual requirements are where there has been a safeguarding incident, thresholds for reporting may vary and so each service must be aware what needs to be reported.

Responsibility – Reporting coordinated and filed by Designated Safeguarding Lead

1. Incidents logged on IMS, reviewed at bi-monthly meetings with Director of Education, Director of Housing, Head of Learner Services and Safeguarding and Head of Governance.



2. Those reaching the threshold for reporting as outlined above are identified



3. Incidents which come to light which:

- An allegation that a staff member has sexually assaulted a service user
- An allegation that a staff member has physically assaulted a service user

Are considered of sufficient severity and will not wait for review at bi-monthly meetings and will go straight to point 4.



4. Relevant Trustees contacted about intention to report



5. Reports are coordinated and filed



6. Reported to next Council meeting

Annex 10 - Glossary of Terms

Care Order - a court order under Section 31 of the Children Act 1989 placing a child in local authority care to protect the child from harm they are suffering or may suffer, whilst under the care of his/her parent (and/or being beyond a parent's control).

Child in Need (CIN) - is a child assessed to have need of services under Sec 17 Children Act 1989.

Child Protection - refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. This is enshrined within Section 47 (see below) of the Children Act 1989.

Child Protection Case Conference - a multi-agency meeting to establish whether the child should become the subject to a child protection plan.

Child Protection Plan - for all those children who have been identified at a child protection conference as being at a continuing risk of significant harm, a Child Protection Plan will be created. This is a plan setting out what steps and provisions are needed to safeguard a child's welfare and minimize all risks of harm to a child.

Child Protection Register (CPR) - in April 2008, the Child Protection Register ceased to exist. The term now used is 'children subject to a Child Protection Plan'. Contact Order A legally binding order requiring the resident party/parent to make the child available for contact with the person named in the Order.

Common Assessment Framework (CAF) - The CAF is a four-step process whereby practitioners can identify a child's or young person's needs early, assess those needs holistically, deliver coordinated services and review progress. The process is entirely voluntary and informed consent is mandatory, so families do not have to engage and if they do they can choose what information they want to share. Children and families should not feel stigmatised by the CAF; indeed they can ask for a CAF to be initiated. The CAF process is not a 'referral' process but a 'request for services'.

Contact - is a contact made with the MASH (by member of the public or a professional), that has not been evaluated and confirmed as a "referral" (see below for MASH).

Core Group - is the group of key professionals involved in monitoring the progress of child protection plans between child protection conferences.

Early Help - is the provision of support to children and families by universal services or integrated teams (see below for Integrated Team).

Emergency Protection Order (EPO) - a court order under Section 44 of the Children Act 1989 giving Children's Social Care the power to protect a child from harm by removing the child to suitable accommodation or preventing a child from being removed (e.g. from hospital).

Eco Map - is a diagrammatic representation of relationships within a family network and with a child – as defined by the subject (usually the child).

Genogram – is a diagrammatic representation of a family's genetic relationships. A

“family tree” contains also the non-genetically connected family relationships and may be used to record family relationship trends / patterns e.g. children living away from family, miscarriages / abortions etc.

Integrated Team – is a term used to show that Health and Social Services are working together in an area as a single team.

Interim Care Order (ICO) - time limited court order which places a child in care of the local authority under the Children Act 1989 to be renewed by the court after no more than 8 weeks and then every 4 weeks

LADO – local authority designated officer.

LSCB and local partners – Section 13 of the Children Act 2004 required each Local Authority to establish a Local Safeguarding Children Board for their area and specified the organisations and individuals (rather than the local authority) that should be represented on LSCBs. Working Together to Safeguard Children 2018 set in legislation that three safeguarding partners (Local Authority, Chief Officer of Police, and Clinical Commissioning Groups) must work together with relevant agencies to safeguard and protect the welfare of children in a local authority area. This arrangement has replaced the pre-existing legislation for Local Authorities to have Local Safeguarding Children Boards (LSCBs).

“Looked after Child” (LAC) – is any child / young person who is either voluntarily placed (under Sec 20 Children Act 1989), or placed under a Care Order (Sec 31 Children Act 1989) with foster carers, kinship carers, in residential provision, or whilst subject to a Care order is residing with a parent/s.

MAPPA - Multi-Agency Public Protection Arrangements (MAPPA) is the name given to arrangements in England and Wales for the "responsible authorities" tasked with the management of registered sex offenders, violent and other types of sexual offenders, and offenders who pose a serious risk of harm to the public.

MARAC - Multi-Agency Risk Assessment Conferences (MARACs) are regular local meetings where information about high risk domestic abuse victims (those at risk of murder or serious harm) is shared between local agencies. By bringing all agencies together at a MARAC, and ensuring that whenever possible the voice of the victim is represented by the Independent Domestic Violence Adviser (IDVA), a risk focused, co-ordinated safety plan can be drawn up to support the victim.

M.A.S.H. – the Multi Agency Safeguarding Hub, which receives all new contacts and referrals passed from Care First, gathers initial agency information to determine how to respond to a contact or referral. (Local Authorities may have different front door arrangements).

Multi agency planning discussion - is the discussion convened by the assessing Social Worker to determine what actions/supports/assessments are required to best meet the needs of a child.

Parental Responsibility (PR) - the legal rights and responsibilities automatically acquired by a mother and gained by a father whose name is added to the child's birth certificate. Other people may gain PR by court order (Residence Order, Special Guardianship, Adoption, and Parental Responsibility) – including the local authority which may acquire PR via a Care Order.

Public Law Outline (PLO) Public law cases relate to local authority intervention to

protect children where there are child welfare issues – legal and local authority processes followed prior to possible public law applications (which includes a “PLO” meeting convened with parents/carers and their lawyers to share concerns and agree/determine any interventions).

Sec 47 - section of the Children Act 1989 under which enquiries and actions may be taken by the local authority when a child is deemed to be suffering or likely to suffer, significant harm.

Significant harm – as referred to, but not defined, under Sec 31 Children Act 1989 (“harm” defined as being “ill treatment” or the impairment of health or development).

Social Care (Specialist Services) – The department of local authority Children and Young People’s Services that undertakes its statutory duties in respect of children in need and those in need of protection.

Statutory Assessment - Statutory Assessment is sometimes referred to as the "statementing process" as it may result in a statement of special educational needs for a child.

Strategy Discussion – The formal discussion (or meeting) convened by social care under statutory guidance (Working together 2013) which determines the nature of enquiries and actions where a child is believed to be suffering, or at risk of suffering, significant harm.

(T.A.C.) Team around the Child - the team that provides, commissions and coordinates services to help children and families requiring additional support but have not met the threshold for services under Sec 17 Children Act 1989.

ANNEX 11

LIST OF ABBREVIATIONS

BASS	Bail Accommodation Support Service
DSL	Designated Safeguarding Lead
DSO	Designated Safeguarding Officer
ELT	Executive Leadership Team
ESFA	Education and Skills Funding Agency
FGM	Female Genital Mutilation
GDPR	General Data Protection Register
GP	General Practitioner
HBV	Honour based violence
HR	Human Resources
ID	Identification
IMS	Incident Management System
LADO	Local Area Designated Officer
MASH	Multi-agency Safeguarding Hub
NSSL	National Strategic Safeguarding Lead
SEN	Special Educational Needs
TAC	Team around the child
TAF	Team around the family
TRA	Teaching Regulatory Authority

ANNEX 12



Information about your local team and safeguarding leads

Role	DSO
Name	
Email address	
Phone number(s)	
Location/ Address	
Role	Area DSO/ Service Lead (housing)
Name	
Email address	
Phone number(s)	
Location/ Address	
Role	Directorate DSL
Name	
Email address	
Phone number(s)	
Location/ Address	
Role	Corporate Safeguarding Administrator
Name	
Email address	
Phone number(s)	
Location/ Address	
Role	LADO
Name	
Email address	
Phone number(s)	
Location/ Address	