



CHILD PROTECTION & SAFEGUARDING

POLICY AND PRACTICE GUIDANCE

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CHILD PROTECTION

POLICY AND PRACTICE GUIDANCE

1. Policy Statement

The Directors of A+bility Limited believe:

1.1 that the welfare of the child is paramount

1.2 that all children, without exception, have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs

1.3 that children should feel safe

2. Purpose

The purpose of this policy is to make clear to staff, volunteers and associates the procedures which should be followed in relation to protecting children and young people. They are compliant with the Gloucestershire Safeguarding Executive's procedures.

3. Scope

This policy applies to all A+bility Limited staff, associates and volunteers. The policy encompasses children only. Some service users receive an unbroken service from the Company after they reach the age of 18 and there is a Safeguarding Vulnerable Adults Policy which pertains to those individuals.

4. Child Protection Management Arrangements:

4.1 The Designated Child Protection Manager is **Sally Jackaman**.

4.2 The Designated Child Protection Deputy Managers are Alayne O'Connor, Fiona White, Sadie Paul and Allyson Scott.

4.3 The Board of Directors ensures that there is always (24 hours a day, 7 days a week) a Child Protection Manager or a Deputy Child Protection Manager on call.

5. Context of the Policy

This Policy should be read in conjunction with: Gloucestershire County Council's "Child Protection Policy and Safeguarding Policy". We will follow the procedures set out by Gloucestershire Safeguarding Children's Executive and take account of guidance issued by the Department for Education.

[Gloucestershire Safeguarding Children](#)

[UK Government - Keeping children safe in education](#)

5.1 Legislation & other related policies and procedures including:

5.1.1 Legislation

The Children Act 1989
The Children Act 2004
(*Both the above amended by: The Children and Social Work Act 2017*)
The Education Act 2002 (Section 175)
Sexual Offences Act 2003
The Data Protection Act 1998
Human Rights Act 1998
The 2014 Care Act

5.1.2 Statutory Guidance

[Keeping Children Safe in Education - revisions \(September 2022\)](#)
[Working Together to Safeguard Children \(DfE July 2022\)](#)
[Multi-agency statutory guidance on Female Genital Mutilation \(July 2020\)](#)
[Relationships and Sex and Health Education \(September 2021\)](#)

5.1.3 GCSE Guidance

[Child Protection Procedures Manual](#)
Gloucestershire Safeguarding Children Executive Handbook
Gloucestershire Safeguarding Children Executive Protocols
Gloucestershire Safeguarding Children Board Child Sexual Exploitation
Commissioning Strategy 2014

5.1.3 A+bility Limited Policies

Behaviour Management Policy
Complaints, Concerns, Compliments and Comments Policy
Equality, Diversity and Inclusion Policy
Going Missing and Missing From Care Policy
Leaving Care Policy
Lone Working Policy
Modern Slavery & Human Trafficking
Personal Care
Recording Information and Data Protection Policy
Safe Recruitment Policy
Whistle Blowing Policy

6. Mandatory Procedures

There are seven elements to our procedures: Safe Recruitment; Raising Awareness; Reporting; Supporting Children; Creating a Safe Environment for children; The 4 C's (Complaints, Concerns, Compliments and Comments); Creating a Safe Environment for Staff.

6.1 Ensuring we practice **safe recruitment** in checking the suitability of staff, associates and volunteers to work with children.

6.1.1 All staff, associates and volunteers working with children have clear enhanced DBS checks no older than 3 years.

6.1.2 Staff, associates and volunteers who are not on the DBS update service are required to complete a suitability statement annually

6.1.3 All staff and volunteers will have provided 2 verified references stating their suitability to work with children.

6.1.4 There is a clear process for ensuring DBS checks are carried out before the 3-year expiry threshold is reached, using a spread sheet.

6.1.5 Those on the DBS update service will be checked annually for changes.

6.1.6 Managers sign up for safeguarding alerts for children and disseminate information to staff, associates and volunteers as appropriate.

6.1.8 Managers maintain an electronic file of safeguarding referrals to the helpdesk/social care.

6.2 **Raising awareness** of child protection issues and equipping service users with the skills needed to keep them safe.

6.2.1 All staff, associates and volunteers are required to support children to learn ways to keep themselves safe

6.2.2 This includes promoting e-safety with reference to computers, laptops, tablets, mobile phones, and any other devices. Useful websites for use with children are [Childnet](#) and [NCA \(National Crime Agency\)](#).

The NSPCC's site is a useful source of information on keeping safe online [NSPCC Online Safety](#), including guidance on E-safety.

Staff must be aware of the signs of cyber-bullying and how to support young people in this situation. Useful guidance [NSPCC bullying and cyber-bullying](#)

6.2.3 Bullying is not tolerated. Staff provide support and guidance to children who are bullies and/or bullied; to increase awareness of impact and to find strategies to keep themselves safe. See Managing Challenging Behaviour Policy.

6.2.4 Parents and carers are informed of the activities the service users will undertake, child protection/safeguarding and complaints procedures and of the voluntary OFSTED registration system and OFSTED's address

6.3 Developing and then implementing procedures for **identifying and reporting** cases, or suspected cases, of abuse.

6.3.1 All staff and associates receive online Child Protection training at the point of joining the company.

6.3.2 All staff and associates are given instructions about how to recognise signs and indicators of abuse, and how to report concerns.

6.3.3 All concerns and allegations of abuse are taken seriously and responded to appropriately - this might require a referral to the Commissioning Agency, the helpdesk and the Police.

6.3.4 A member of staff who has concerns must raise them with the on call manager or Director by telephone on the same day.

6.3.5 The Board has appointed a named person and deputy to take responsibility for Child Protection.

These are: **Named Person – Director Sally Jackaman**. Deputies: Directors Alayne O'Connor and Fiona White; Managers Allyson Scott and Sadie Paul.

One of these officers will pass on concerns to the appropriate authorities having made a dynamic risk assessment of the need to raise it as an emergency or wait until the next working day.

A referral is made using a Multi-Agency Request Form [MARF portal](#) or directly to a child's Social Worker, should they have one. A decision is made whether to notify parents and this is recorded on the Safeguarding Spreadsheet. This document is reviewed by The Board monthly.

6.3.6 Staff raising concerns will record them on the Company's Recording Form and pass them on to the designated person as soon as possible.

6.3.7 The nominated Lead Professional for Child Sexual Exploitation is Sally Jackaman, Director.

6.3.8 In respect of under 18s, allegations against Directors, staff, associates and volunteers will be reported to the Gloucestershire Safeguarding Children's Executive Local Area Designated Officer (LADO).

6.3.9 Concerns about safety will supersede agreements on information sharing. The welfare of children must be prioritised in compliance with the Gloucestershire Information Sharing Partnership Agreement when making records available to other agencies including when there is an enquiry. Transfer of information must be made safely in accordance with the Confidentiality and Data Protection Policy.

6.3.10 Procedures for managing disputes in professional decisions about children are informed by the GSCE's 'Escalation' policy which is included in A+bility's Induction Pack. Staff will receive updates and outcome information

from the Director managing the process.

6.4 Supporting children or young people who have been abused, or are vulnerable to abuse, in accordance with his/her agreed care or child protection plan where appropriate.

6.4.1 Commissioning agencies are required to provide information necessary to ensure each service user's needs are met. This information is held on the individual risk assessment and behaviour management plan.

6.4.2 Support staff, Managers or Directors will attend multi-agency meetings as requested by commissioning agencies. This will feature in the service agreement.

6.4.3 Special care is taken when offering personal (intimate) care to children, especially when those people have limited understanding and communication and are therefore less able to raise concerns about their care. See Personal Care Policy.

6.5 Establishing a safe environment in which children can have fun, learn and develop

6.5.1 All staff and associates have received Safeguarding & Child Protection training appropriate to their role and are subject to regular supervision. They also receive updated training annually, including accessing e-learning training provided by *LearnPro*. This covers: Signs and Indicators; E Safety; Radicalisation; Stalking and Modern Slavery.

6.5.2 Managers are required to complete the Safeguarding Leadership e-learning training.

6.5.3 'One off' volunteers must be given a verbal briefing by the activity leader who will have completed the appropriate training for the age group.

6.5.4 Staff are required to log on to [Gloucestershire Safeguarding](#) regularly. Alerts are received by the company and these are disseminated to staff.

6.5.5 Individual risk assessments are kept on all current service users in order to ensure the correct level of support and supervision is in place for each individual. This includes a 'Matching' assessment to ensure that those living together in shared accommodation do not pose unmanageable risks to each other. See Leaving Care Policy.

6.5.6 The Directors of A+bility Limited will take all reasonable steps to ensure that no individual who is unsuitable will have unsupervised contact with the children in their care

6.5.7 Young People who go missing from care are vulnerable and can find themselves in unsafe situations. Procedures are followed in line with the [Gloucestershire Joint Protocol](#).

Staff provide support to any young people who have been missing. See Going Missing and Missing From Care Policies. When young people go missing from care staff follow the Notifiable Event procedures. See Recording Information and Data Protection Policy.

Staff should respond immediately when a child or young person goes missing. The young person's care plan and risk assessment will have a protocol if this is a regular occurrence, and this should be followed. Staff will try to contact the young person if they have a mobile phone. The Social Worker (Emergency Duty Team out of hours) and the Police must be informed, as well as the on call manager and parents. EDT and Police phone numbers are available from the Duty Manager for quick access. A dynamic risk assessment can be done with the on call manager before staff pick up a young person they have tracked down. Soon after a 'going missing' occurrence the young person will be offered a 'Life Space Interview' with a trusted staff member, to support them to make safe decisions.

6.5.8 Managers on call guide support staff to use the Missing from Care Protocol, the GSCE Child Protection procedures, and the Child Sexual Exploitation tool as necessary.

6.5.9 Managers on call raise concerns about the safety of children during working hours by phoning the Children's Helpdesk then emailing the Referral Form for Professionals.

6.5.10 Managers on call are aware of the management requirements relating to 'Allegations' and know how to contact the Local Authority Designated Officer (LADO). Details are available at Salmon Springs.

6.6 Informing all staff, Commissioning Agencies, and service users of the company's **Complaints, Concerns, Compliments and Comments** policy.

6.6.1 All staff will have a copy of the Complaints, Concerns, Compliments and Comments Policy.

6.6.2 Service users are informed of the complaints policy, and will be given a copy on request.

6.6.3 Service users are supported to make complaints in ways that meet their needs in terms of age, understanding and preferred method of communication.

6.7 Establishing a **safe environment for staff**, associates and volunteers to carry out their duties.

6.7.1 All staff and associates have a copy of the Complaints, Concerns, Compliments and Comments Policy.

6.7.2 All staff and associates have a copy of the Whistle Blowing Policy. This is to support them in their duty to report when staff practice is unsafe, or has

safeguarding implications.

6.7.3 All staff and associates have a copy of the Equality, Diversity and Inclusion Policy which covers bullying and harassment.

6.7.4 Staff, associates and volunteers will be supported to make complaints or raise concerns when their safety has been compromised, or is being compromised.

6.7.5 If staff, associates or volunteers feel threatened, or have been threatened or hurt by service users, the Directors will ensure that this is taken up with the Commissioning Agency and ensure that all reasonable steps are taken to minimise the likelihood of a repeat; this in no way affects the right of the aggrieved person to report offences to the Police or to take legal action.

7. Definitions

7.1 Physical abuse

Physical abuse might involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm might also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

7.2 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a person. With children it can cause severe and persistent adverse effects on the child's emotional development. It might involve conveying to people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It might feature age or developmentally inappropriate expectations being imposed on children. These might include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction and taking decisions and making choices they would be entitled to make if they were not vulnerable. It might involve seeing or hearing the ill-treatment of another. It might involve serious bullying causing people frequently to feel frightened or in danger, or the exploitation or corruption of people. Some level of emotional abuse is involved in all types of maltreatment of a child, though it might occur alone. Emotional abuse can also include threats and stalking.

7.3 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities might involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts.

7.4 Child Sexual Exploitation (CSE)

Child sexual exploitation is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual acts on others, or others performing sexual acts on them.

Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

We offer online training courses for staff that cover the exploitation of children – be it sexual or criminal:

[PACE - UK CSE Keep them safe](#)

[Virtual College CSE Keep Them Safe](#)

[Pace UK - Child Criminal Exploitation, County Lines](#)

We also point staff to the following website.

[Government guide on CSE for Practitioners](#)

7.5 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect might occur during pregnancy as a result of maternal substance abuse. Neglect might involve a parent or carer failing to provide adequate food and clothing or shelter including exclusion from home or abandonment; failing to protect a child in their care from physical and emotional harm or danger; failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It might also include neglect of, or unresponsiveness to, a child's basic emotional needs.

7.6 Domestic Violence

The impact of domestic violence can go beyond actual physical violence, to involve emotional abuse, the destruction of property, isolation from friends, family or sources of support, control over decision making, money, transport or telephone and can include the impact of witnessing violence. A child who lives in a household where domestic violence is a feature of family life, has been abused by these life experiences.

Useful websites are:

[Glos Domestic Abuse Support](#)

[Glos Take a Stand](#)

7.7 Stalking and Harassment – Physical and Cyber

Stalking is: “A pattern of fixated and obsessive behaviour which is repeated, persistent, intrusive, and causes fear of violence or engenders alarm and distress in the victim”. It is also a criminal offence.

Harassment is: “Unwanted behaviour from someone else that makes one feel distressed, humiliated or threatened”.

Examples include: unwanted phone calls, texts, letters, emails; visits – standing outside someone’s home, repeatedly driving past; abuse – both verbal and online; damage to someone’s property, falsely making allegations.

More information can be found at the following websites:

[PEOPLESafe - guidance on Stalking](#)

[National Stalking Helpline](#)

The National Stalking Helpline number is: 0808 802 0300.

7.8 Female Genital Mutilation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons (female genital cutting, circumcision, initiation).

There is a DUTY to all professionals to act to safeguard girls at risk.

For further information refer to:

[Glos Take a Stand - FGM](#)

7.9 Forced Marriage

A forced marriage is where one or both people do not (or in cases of children or people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used.

For more information see:

[Gov guidance on Forced Marriage](#)

[Glos Take a Stand - Forced Marriage](#)

7.10 Terrorism

The Crown Prosecution Service says: “Terrorism is the use of threat of action, both in and outside of the UK, designed to influence any international government organisation or to intimidate the public. It must also be for the purpose of advancing a political, religious, racial or ideological cause.”

Committing, planning, assisting and even collecting information on how to commit terrorist acts are all crimes under British terrorism legislation.

For more information see:

[Government information on Terrorism](#)

7.11 Radicalisation

This is the process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or reject and/or undermine contemporary ideas and expressions of freedom of choice. The threats to children and young people take many forms, not only the high profile incidents of those travelling to countries such as Syria and Iraq to fight, but on a much broader perspective also. The internet, in particular social media, is being used as a channel to promote and engage extreme ideals. Often they promote and glorify violence, and can attract and influence children and, in extreme cases, radicalise them. Research concludes that children can be trusting and not necessarily appreciate bias that can lead to them being drawn into these groups and adopt these extremist views. When viewing what would be considered shocking and extreme content by the majority, they may become inured to it and interpret it as normal.

For further information see:

[Government information on Radicalisation](#)

7.12 Prevent – The Prevent Duty

In order to fulfil the Prevent duty, staff need to be able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Staff can also build pupils’ resistance to radicalisation by promoting fundamental British values and enabling them to challenge *extremist* views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues but to understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments. For further information see:

[The Prevent Duty \(DofE\) June 2015](#)

8. Practice Guidance

8.1 Guidance on listening to allegations:

8.1.1 Do not promise to keep a secret; you have a duty to share concerns of abuse. There is some debate about what the term 'confidentiality' means so do not get hung up about it. Assure the person that you will only inform your manager and/or the police if necessary.

8.1.2 Listen to what is being said, without displaying shock or disbelief.

8.1.3 Accept what is said.

8.1.4 Reassure the child, but only as far as is honest, don't make promises you may not be able to keep e.g. don't say *'Everything will be alright now'*, *'You'll never have to see that person again'*.

8.1.5 Do reassure and alleviate guilt, if the child refers to it. For example, you could say, *'You're not to blame'*.

8.1.6 Do not interrogate the child; it is not your responsibility to investigate.

8.1.7 Do not ask leading questions (e.g. *Did he touch your private parts?*)

8.1.8 Do not ask the child to repeat the information to another member of staff.

8.1.9 Explain what you have to do next and who you have to talk to.

8.1.10 Report to your manager or on call person as soon as you can after the conversation, regardless of the time of day. That person will inform the designated officer who will make decisions about how to report it.

8.1.11 Write up the conversation as soon as possible afterwards.

8.1.12 Record the date, time, and place, any non-verbal behaviour and the words used by the child (do not paraphrase).

8.1.13 Record statements and observable things rather than interpretations or assumptions.

8.2 Allegations Management

If a professional has a concern about another professional or volunteer where they have:

8.2.1 Behaved inappropriately in a way that has harmed or might have harmed a child or

8.3.2 Possibly committed a criminal offence against or related to a child

8.4.3 Behaved towards a child in a way that indicates s/he is unsuitable to work with children then these concerns should be dealt with by reporting to the on call manager of another manager or director as soon as you can. The Allegations Management Procedure must be followed – Appendix 1 to this policy.

8.3 Guidance on Whistleblowing

8.3.1 In the Company's Induction child protection training, staff are made aware of the need to be vigilant regarding the behaviour of other staff and professionals.

8.3.2 The trainer ensures that staff are aware of signs to look out for such as:

- ✓ Favouritism
- ✓ Taking an individual service user away from the group
- ✓ Inappropriate touching
- ✓ Very close relationship
- ✓ Anything that makes them feel uncomfortable

8.3.3 Staff are required to have a duty of care to the child which might involve them talking to a supervisor or manager about their concerns regarding another member of staff. They are protected by the Whistleblowing policy.

9. Monitoring

Child Protection and Safeguarding issues are monitored monthly at Board Meetings.

This policy is reviewed annually after staff consultation.

10. Additional Sources of Useful Information

Staff will find the following documents, containing useful information, in the Policies Folder on the Shared P: Drive, in a sub-folder called “Child Protection” additional information.

GCSE Allegations Management Flow Chart

Signs and Indicators of sexual abuse

Resolution of professional disagreements in work relating to the safety of children

Gloucestershire Escalation Policy 2021

Child Sexual Exploitation – warning signs and vulnerability checklist; CSE Tool

E-safety; nude selfies; Stalking guidelines

Female Genital Mutilation and Forced Marriage

Terrorism and Radicalisation; Prevent Referral Pathway

Modern Slavery

Gloucestershire Public Protection Bureau Monitoring form

Child Protection Process

Keeping Children Safe in Education – September 2021 update from NSPCC