Safeguarding Policy

&

Procedure

For

Child Protection

Revised November 2024

Review date November 2025

Child protection and safeguarding (including safer recruitment, allegations against staff and low-level concerns)

1 Induction

1.1 Safeguarding is everyone's responsibility: This document specifies the Log Cabin Charity's Safeguarding policy and procedures for protecting children and young people at risk. A child is defined as anyone up to the age of 18. The document applies to all Log Cabin staff, including apprentices, trustees, volunteers, agencies, freelancers, beneficiaries and consultants. We share the collective responsibility of safeguarding, and the policy and procedures apply to all Log Cabin Charity activities.

All adults who work with children and young people have a duty of care to safeguard and promote their welfare. Child protection refers to the activity of protecting specific children who are suffering or are likely to suffer significant harm.

2. Aims

The Log Cabin Charity aims to ensure that:

Appropriate action is taken in a timely manner to safeguard and promote children's welfare

All staff are aware of their statutory responsibilities with respect to safeguarding Staff are properly trained in recognising and reporting safeguarding issues

3. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance <u>Keeping Children Safe in Education (2023)</u> and <u>Working Together to Safeguard Children (2018)</u>, and the <u>Governance Handbook</u>. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

3.2 This policy is also based on the following legislation:

- a. Section 175 of the <u>Education Act 2002</u>, which places a duty on schools and local authorities to safeguard and promote the welfare of children and young people
- b. <u>The School Staffing (England) Regulations 2009</u>, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- c. <u>The Children Act 1989</u> (and <u>2004 amendment</u>), which provides a framework for the care and protection of children
- d. Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on staffs to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- e. <u>Statutory guidance on FGM</u>, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- f. <u>The Rehabilitation of Offenders Act 1974</u>, which outlines when people with criminal convictions can work with children
- g. Schedule 4 of the <u>Safeguarding Vulnerable Groups Act 2006</u>, which defines what 'regulated activity' is in relation to children

- h. <u>Statutory guidance on the Prevent duty</u>, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- i. <u>The Human Rights Act 1998</u>, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the <u>European Convention on Human Rights</u> (ECHR)
- j. The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our trustees and head of service should carefully consider how they are supporting their children and young people with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting children and young people (where we can show it's proportionate). This includes making reasonable adjustments for disabled children and young people. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- k. The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve child/young person outcomes. Some children and young people may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The <u>Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge)</u>
 (<u>Extended Entitlement) (Amendment) Regulations 2018</u> (referred to in this policy as the
 "2018 Childcare Disqualification Regulations") and <u>Childcare Act 2006</u>, which set out who
 is disqualified from working with children
- m. This policy also meets requirements relating to safeguarding and welfare in the <u>statutory</u> <u>framework for the Early Years Foundation Stage</u>
- n. New definition of extremism (2024) GOV.UK

 The UK government, in its ongoing efforts to address challenges related to terrorism and radicalisation, introduced a significant update on March 14, 2024-a new definition of extremism.

3.3 The Ealing Safeguarding Children Partnership comprises the statutory partners:

- a. The London Borough of Ealing Local Authority, represented primarily by Children's Services, with appropriate support and engagement from other departments including Adult Social Care, Public Health, Housing and Community Safety
- b. The NW London Integrated Care Board (ICB)
- c. The Chief Officer of Police for the area

ESCP arrangements 2023.24 - safeguarding arrangements 2023.pdf

4. Definitions

- 4.1 Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
 - a. Protecting children from maltreatment
 - b. Preventing impairment of children's mental and physical health or development
 - c. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - d. Taking action to enable all children to have the best outcomes
- **4.2 Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

- **4.3 Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- **4.4** Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.
- **4.5** Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.
- **4.6** Children includes everyone under the age of 18.
- 4.7 The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
 - a. The local authority (LA)
 - b. Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
 - c. The chief officer of police for a police area in the LA area
- **4.8 Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- **4.9** Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

5. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

Context:

The Log Cabin Charity works with children and young people, some with SEND and some with severe and profound learning difficulties.

Adults who work with children and young people with SEND should be aware of the additional needs children may have that could mean they are more vulnerable to abuse and/or less able to speak out if something isn't right.

Some children may be vulnerable because they:

- a. have additional communication needs
- b. they do not understand that what is happening to them is abuse
- c. need intimate care or are isolated from others
- d. are dependent on adults for care.

5.4 Safeguarding children with special educational needs (SEND) NSPCC 13th April 2021

"We give special consideration to children who:

- a. Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- b. Are young carers
- c. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- d. Have English as an additional language
- e. Are known to be living in difficult situations for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- f. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- g. Are asylum seekers
- h. Are at risk due to either their own or a family member's mental health needs
- i. Are looked after or previously looked after (see section 12)
- j. Are missing from education
- k. Whose parent/carer has expressed an intention to remove them from charity to be home educated"

6. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and trustees in The Log Cabin Charity and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to off-site activities.

The implementation of this policy is mandatory across all areas of the charity. Specific responsibilities are outlined below.

6.3 The board of Trustees

The board of trustees will:

- a. Facilitate a whole-organisation approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- b. Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the head of service to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and local multi-agency safeguarding arrangements
- d. Appoint a safeguarding link trustee, to monitor the effectiveness of this policy in conjunction with the full trustee's board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- f. Ensure that The Log Cabin Charity has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the <u>DfE's filtering and monitoring standards</u>, and discussing with IT staff and service providers what needs to be done to support the charity in meeting these standards

g. Make sure:

- The DSL, as the key figure in our safeguarding efforts, is empowered with the necessary status and authority to effectively carry out their duties. This includes additional time, funding, training, resources, and support.
- Online safety is not a one-time concern, but a continuous and interrelated theme within our charity's approach to safeguarding and related policies. This ongoing commitment is vital to ensure the safety and well-being of all involved.
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The charity has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- This policy reflects that children with SEND or specific medical or physical health conditions can face additional barriers to any abuse or neglect being recognised
- h. Where another provider is providing services or activities (regardless of whether the children who attend these services/activities are children on the charity register):
 - Ensure the other body has appropriate safeguarding and child protection policies/procedures, and inspect them if needed
 - Ensure arrangements for the body to liaise with the charity about safeguarding arrangements, where appropriate
 - Ensure that safeguarding requirements are a condition of using the charity premises and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of trustees plays a crucial role as the 'case manager' if an allegation of abuse is made against the head of service. This role ensures accountability and transparency, providing reassurance to all involved (see Appendix 3 for more details).

All trustees will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how trustees are supported to fulfil their role.

6.5 The Head of Service

The head of service plays a crucial role in the implementation of this policy, ensuring its effectiveness and impact. Their responsibilities include:

- a. Ensuring that staff (including temporary staff) and volunteers:
 - As part of their induction, they are informed of our specific systems that support safeguarding, including this policy. They understand and follow the procedures included in this policy, mainly those concerning referrals of cases of suspected abuse and neglect
 - They understand and follow the procedures included in this policy, mainly those concerning referrals of cases of suspected abuse and neglect
- b. Communicating this policy to parents/carers when their child joins the charity and via the charity website
- c. Ensuring that the DSL, as the designated safeguarding lead, has appropriate time, funding, training and resources and that there is always adequate coverage if the DSL is absent
- d. Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the training content regularly
- e. Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3)

- f. While the Head of Service is responsible for making decisions regarding all low-level concerns, they may wish to collaborate with the link trustee, fostering teamwork and shared responsibility
- g. Ensuring the relevant staffing ratios are met, where applicable
- h. Making sure each child in the Early Years Foundation Stage is assigned a key person
- i. Overseeing the safe use of technology, mobile phones and cameras in the setting

6.6 Line Managers

Responsible for:

- **a.** It is of utmost importance to ensure that all staff, apprentices, trustees, agencies, freelancers, consultants and volunteers feel secure and respected when discussing safeguarding, child protection and abuse issues. They should be able to do so confidentially and receive guidance and support on action if situations arise;
- **b.** Ensure the full implementation of the Safeguarding policy locally. We must set up procedures to support the policy as outlined, comply with them, and effectively communicate them.
- c. Ensuring the referral of all safeguarding and child protection issues to the Designated Safeguarding Lead (DSL). (This may be as simple as discussing a hypothetical issue to protect identities);
- **d.** Ensure all reporting staff must be fully informed and prepared by knowing their roles and responsibilities under this policy. This understanding must be a part of their induction process
- **e.** Ensuring staff and volunteers undertake appropriate and required induction and training in safeguarding/child protection at the required level relevant to their role;
- f. Ensure all new staff members and volunteers have the required DBS disclosure certificate in place if they are engaging in regulated activity with children/young people.

6.7 All Trustees, staff, apprentices, volunteers, agency staff, freelancers and consultants

- a. Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, <u>Keeping Children Safe in Education</u> (KCSIE), and review this guidance at least annually. This annual review is a crucial part of our commitment to safeguarding and ensures that we are always up to date with the latest guidelines
- b. Sign a declaration at the beginning of each calendar year to say that they have reviewed the guidance
- c. Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- d. Provide a safe space for children and young people who are LGBT to speak out and share their concerns

All Trustees, staff, apprentices, volunteers, agency staff, freelancers and consultants will be aware of:

- a. Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, physical intervention policy, acceptable use policy, electronic information and communication policy, social media policy, information security policy, relationships policy, moving and handling policy, intimate care policy, the role and identity of the designated safeguarding lead (DSL) and deputy, and the safeguarding response to children who go missing from education
- b. Understand the early help assessment process (commonly known as the common assessment framework) and your role in it. This includes identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

- c. This process is crucial in providing timely and appropriate support to children and young people. Understand the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral. This includes the role you might be expected to play in providing information and support during the assessment process
- d. Your prompt and accurate reporting can make a significant difference in ensuring the safety and well-being of the child. Understand what to do if you identify a safeguarding issue or a child tells you they are being abused or neglected. This includes maintaining an appropriate level of confidentiality while liaising with relevant professionals. Your ability to handle sensitive information with respect and discretion is crucial in these situations
- e. How to identify specific risks that disabled children and young people and those who have SEND may experience or present, including those with behavioural, emotional and social difficulties
- f. The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- g. How to identify signs of abuse for disabled children and young people and those who have SEND
- h. The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their homes, at charity and online
- The fact that children with disabilities and SEND are more at risk of abuse
- k. The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- I. What to look for to identify children who need help or protection

Section 15 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

6.8 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Sharon Flynn, Head of Service. The DSL takes lead responsibility for child protection and wider safeguarding in the charity.

The DSL, Sharon Flynn, will be readily available for staff to openly and comfortably discuss any safeguarding concerns.

When the DSL is absent, the deputy DSL, Daniel Yap, Playground Manager, will act as cover.

If the DSL and deputy DSL are not available, Alia Latif, the Service Manager, will act as cover (for example, when the DSL and deputy DSL are out of the office).

The DSL, Sharon Flynn, and Deputy DSL, Daniel Yap, will be provided with comprehensive support, including time, funding, training, and resources, to ensure they are well-equipped to handle their responsibilities:

- a. Provide advice and support to other staff on child welfare and child protection matters
- b. Take part in strategy discussions and inter-agency meetings and support other staff to do so
- c. Contribute to the assessment of children

- d. Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police) and support staff who make such referrals directly
- e. Have a thorough understanding of harmful sexual behaviour, ensuring staff's confidence in her ability to handle such sensitive matters

The DSL will also:

- a. Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- b. Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the charity's policies
- c. Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- d. Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

7. Confidentiality

The Log Cabin Charity's approach to confidentiality is outlined through data policies. The Information Security Policy 2023 details the requirements of information security and the responsibility of staff to protect the confidentiality and integrity of the information they hold

Our Data Protection Officer (DPO) is responsible for overseeing data protection strategy and implementation to ensure compliance with the DPA 2018 and UK GDPR

In addition to this, we note that:

- a. Timely information sharing is essential to effective safeguarding
- b. Your role in safeguarding children is crucial as part of our team. Fears about sharing information must not stand in the way of promoting the welfare and protecting the safety of children. Your commitment to this safeguarding is not just important, it's highly valued and appreciated
- c. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent or limit the sharing of information to keep children safe
- d. If staff need to share 'special category personal data', such as health or sexual orientation information, the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- e. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- f. If a victim asks the charity not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies. This legal basis provides a secure framework for your actions. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:

- Parents or carers should generally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- a. Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's <u>information sharing advice for safeguarding practitioners</u> includes 7 'golden rules' for sharing information. These rules provide a clear framework for decision-making and will support staff who have to make decisions about sharing information

If staff have doubts about sharing information, they should speak to the DSL (or deputy). This support is always available to ensure you feel confident in your decisions and reassured that you are not alone in making these important choices

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in Appendix 3

8. Recognising abuse and taking action

Recognising abuse and taking immediate, decisive action is crucial in safeguarding situations.

It is imperative that all parties, including trustees, staff, apprentices, volunteers, agency staff, freelancers, contractors, and consultants, adhere to the procedures outlined below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)", a crucial role in our safeguarding procedures, providing support and guidance.

8.2 If a child is suffering or likely to suffer harm or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Remember, the DSL (see section 5.2) plays a key role in this process. If you make a direct referral, it is important to inform the DSL as soon as possible.

Local procedures for making a referral are as follows 'if you see something, do something'

<u>Ealing Safeguarding Children Partnership / ESCP Home | Ealing Directory (ealingfamiliesdirectory.org.uk)</u>

https://www.gov.uk/report-child-abuse-to-local-council

8.3 If a child makes a disclosure to you

When a child discloses a safeguarding issue to you, it's crucial that you take immediate action, you should:

- b. Listen to and believe them. Allow them time to talk freely, and do not ask leading questions
- c. It's important to stay calm and composed, and not show that you are shocked or upset. This will reassure the child and help them feel in control of the situation. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- d. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- e. It's important not to promise to keep the disclosure a secret. Instead, explain what will happen next and that you will have to pass this information on
- f. Write up your conversation in the child's own words as soon as possible. Stick to the facts, and do not put your own judgment on it
- g. Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Remember, confidentiality is crucial. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

Remember, none of the potential barriers should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child. Their guidance and support are invaluable in these situations.

8.4 If you discover that FGM has taken place or a child/young person is at risk of FGM

a. Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a child/young person has already been subjected to FGM, and factors that suggest a child/young person may be at risk, are set out in appendix 4 of this policy.

Any staff who either:

• Is informed by a girl under 18 that an act of FGM has been carried out on her or

 Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18, and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and staffs will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a child/young person under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for staff mentioned above does not apply in cases where a child/young person is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine children and young people.

Any member of staff who suspects a child/young person is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

Local procedures: <u>Female Genital Mutilation | Ealing Directory</u> (<u>ealingfamiliesdirectory.org.uk</u>)

8.5 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger)

- b. Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.
- c. Speak to the DSL first to agree on a course of action.
 - If, in exceptional circumstances, the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. Remember, you can also seek advice from the NSPCC helpline on 0808 800 5000. You are not alone in this. Share details of any actions you take with the DSL as soon as possible.
 - d. If appropriate, make a direct referral to the local authority children's social care (see 'Referral' below). Share any action taken with the DSL as soon as possible.

e. Early help assessment

If an early help assessment is appropriate, the DSL will generally lead the liaising with other agencies and set up an inter-agency assessment as appropriate. Your role as staff is crucial in supporting other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

As part of local arrangements, we will discuss and agree on levels for the different types of assessment with statutory safeguarding partners.

The DSL will constantly review the case, and the Log Cabin will consider referring the child to local authority children's social care if the situation is not improving. Intervention timelines will also be monitored and reviewed, ensuring the safety and well-being of the child.

Local procedures: <u>Early Help Assessment and Plan (EHAP)</u> | <u>Early Help Assessment and Plan (EHAP)</u> | <u>Ealing Council</u>

8.6 Referral

- a. If it is appropriate to refer the case to local authorities, children's social care, or the police, the DSL will make the referral or support you.
- b. Should you decide to make a referral directly (see section 7.1), it is imperative that you inform the DSL immediately, as their guidance is crucial in this step.
- c. After a referral is made, the local authority will decide on the course of action within 1 working day and communicate the outcome. It is the responsibility of the DSL or the person who made the referral to follow up with the local authority if this information is not made available, ensuring that outcomes are properly recorded.
- d. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed.

Local referral and escalation procedures: <u>Ealing Children's Integrated Response Service |</u>
<u>Ealing Council</u>

8.6 If you have concerns about extremism

- a. The DSL plays a crucial role in our support system. If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
- b. In exceptional circumstances where the DSL is not available, it's crucial not to delay appropriate action. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.
- c. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include <u>Channel</u>, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
- d. Remember, the Department for Education also has a dedicated telephone helpline, 020 7340 7264, which staff and trustees can call to raise concerns about extremism with respect to a child/young person. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
- e. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
 - Think someone is in immediate danger
 - Think someone may be planning to travel to join an extremist group
 - See or hear something that may be terrorist-related

8.7 If you have a mental health concern

- a. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- b. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

- c. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.
- d. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.
- e. Refer to the Department for Education guidance on <u>mental health and behaviour in charitys</u> for more information.

8.8 Concerns about a staff member, including supply staff, consultants, freelancers, apprentices, trustees, volunteers, or contractors

- a. Should you have concerns about a staff member, including supply staff, consultants, freelancers, apprentices, trustees, volunteers, or contractors, or if an allegation is made about a staff member posing a risk of harm to children, it is crucial that you report this to the head of service or the chair of trustees immediately. In the rare event that the concerns or allegations involve the head of service, please speak to the chair of trustees..
- b. If appropriate, the head of service or chair of trustees will then diligently follow the comprehensive procedures set out in Appendix 3, ensuring a thorough and fair investigation.
- c. If you find yourself in a situation where you believe there is a conflict of interest in reporting a concern or allegation about a staff member to the head of the service, it is important that you report it directly to the local authority designated officer (LADO). The LADO is there to ensure that all concerns are handled appropriately and impartially).
- d. As part of our commitment to transparency and accountability, the charity will inform Ofsted of any allegations and take appropriate actions within the necessary timescale. For more details on the necessary timescale, please refer to Appendix 3

8.9 Allegations of abuse made against other children and young people

We uphold a zero-tolerance policy towards abuse, regardless of its form. We do not condone or dismiss abuse as 'banter', 'just having a laugh', or 'part of growing up'. Such attitudes can foster a culture of unacceptable behaviours and compromise the safety of our children and young people.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of children and young people hurting other children and young people will be dealt with under our charity's behaviour policy. However, this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. If you witness or suspect child-on-child abuse, you are required to report it immediately to designated reporting authority. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence. Any behaviour that is serious and potentially a criminal offense will be treated with the utmost seriousness
- Any behaviour that could potentially put our children and young people at risk will be addressed immediately
- Is violent
- Involves children and young people being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

8.10 Procedures for dealing with allegations of child-on-child abuse

- a. This form of abuse is when there is any physical, sexual, emotional, or financial abuse or coercive control exercised between children/young people both on and offline. All staff must understand the importance of challenging inappropriate behaviour between children/young people. It is essential that staff don't downplay certain behaviours and that they recognise the emotional damage that can be caused.
- b. Some children and young people at the Log Cabin have behaviours that challenge them; this can include, for example, spitting, biting, targeting other children and young people, and sensory behaviours. We are acutely aware that most children and young people at Log Cabin do not have the cognitive ability or emotional maturity to realise the consequences of their actions; however, the child/young person who has been on the receiving end of this behaviour may feel bullied, fearful or abused. We must listen to these children and young people by observing their behaviours, allowing them to use their voices, and responding to what they are telling us so that they feel protected and safe. We must also communicate with parents and involve them in decision-making as advocates for their children. A record of this behaviour will be documented.
- c. If a child/young person makes an allegation of abuse against another child/young person:
 - You must record the allegation and tell the DSL, but do not investigate it
 - The DSL will contact the local authority children's social care team and follow its advice and the police if the allegation involves a potential criminal offence
 - The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering the charty's transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
 - If appropriate, the DSL will contact the Children and Adolescent Mental Health Services (CAMHS)
- d. Suppose the incident is a criminal offence, and there are delays in the criminal process. In that case, the DSL will work closely with the police (and other agencies as required) while protecting children and taking disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

If a staff member reports targeted behaviour towards another child:

- Inform parents
- Review the charity's risk assessment
- · Review child RA and BSP
- Consistent approaches to managing behaviour agreed with all parties, including parents
- Consider wider measures e.g. 1:1 support, change of days

9. Creating a supportive environment in Log Cabin and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- a. Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- b. Be vigilant to issues that particularly affect different genders for example, sexualised or aggressive touching or grabbing towards female children and young people, and initiation or hazing-type violence concerning boys
- c. Ensure our support helps to educate children and young people about appropriate behaviour and consent, public and private
- d. Ensure children and young people can easily and confidently report abuse using our reporting systems (e.g. talking mats) or ensure that children and young people have key adults who can report changes in behaviour/emotions/well-being
- e. Ensure staff reassure victims that they are being taken seriously
- f. Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the activities or could reflect wider issues in the local area that should be shared with safeguarding partners
- g. Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- h. Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- i. Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - Even if there are no reports of child-on-child abuse in the charity, it does not mean it is not happening staff should maintain an attitude of "it could happen here"
 - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
 - Certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a child/young person harming a peer could be a sign that the child is being abused and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - Staff should be aware that social media is likely to play a role in the fall-out from any incident or alleged incident, including potential contact between the victim, alleged perpetrator(s) and friends from either side. Understanding this can help in managing the situation effectively.
- j. The DSL will lead in disciplining the alleged perpetrator(s). We will provide support while taking any disciplinary action.
- k. Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident

doesn't (in itself) prevent the Log Cabin from coming to its conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, considering whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA Children's Social Care to determine this
- a. There are circumstances that make it unreasonable or irrational for us to reach our view about what happened while an independent investigation is ongoing

9.2 Sharing of nudes and semi-nudes ('sexting') guidance from the UK Council for Internet Safety Your responsibilities when responding to an incident

Suppose you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth-produced sexual imagery'). In that case, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a child/young person to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- b. Delete the imagery or ask the child/young person to delete it
- c. Ask the child/young person(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- d. Share information about the incident with other members of staff, the child/young person(s) it involves or their, or other, parents and/or carers
- e. It is crucial that you refrain from saying or doing anything that could be perceived as blaming or shaming any young people involved. This approach fosters a culture of empathy and understanding

You should explain that you need to report the incident, and reassure the child/young person(s) that they will receive support and help from the DSL.

9.3 Initial review meeting

Following a report of an incident, the DSL will lead an initial review meeting with appropriate staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. The DSL's role in this meeting is to guide the discussion and ensure all necessary steps are taken. This meeting will consider the initial evidence and aim to determine:

- a. Whether there is an immediate risk to child/young person(s)
- b. If a referral needs to be made to the police and/or children's social care
- c. If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- d. What further information is required to decide on the best response
- e. Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- f. Whether immediate action should be taken to delete or remove images or videos from devices or online services
- g. Any relevant facts about the children and young people involved which would influence risk assessment
- h. If there is a need to contact another setting or individual

i. Where appropriate, it is important to consider involving the parents or carers of the children and young people involved. This approach demonstrates a sense of responsibility and care for the well-being of the young individuals

The DSL will make an immediate referral to police and/or children's social care if:

The incident involves an adult

- a. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to disability or special educational needs)
- b. What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
- c. The imagery involves sexual acts, and any child/young person in the images or videos under 13
- d. The DSL has reason to believe a child/young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above applies, the DSL, in consultation with the head of service and other staff members as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision-making process will involve thoroughly reviewing the incident and considering all relevant factors. The decision will be made and recorded in line with the procedures set out in this policy, ensuring transparency and accountability.

Further review by the DSL

If a decision has been made not to refer to police and/or children's social care at the initial review stage, the DSL will conduct a further review to establish the facts and assess the risks.

They will interview the children and young people involved (if appropriate).

If, at any point in the process, there is a concern that a child or young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL is committed to informing parents or carers early and keeping them involved unless there is a good reason to believe that involving them would put the child/young person at risk of harm. This commitment fosters a sense of transparency and trustworthiness.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through local Neighbourhood police by dialling 101.

Recording incidents

All incidents of sharing nudes and semi-nudes and the decisions made in responding to them will be recorded. The record-keeping arrangements in section 14 of this policy also apply to recording these incidents.

10. Reporting systems for our children and young people

Where there is a safeguarding concern, we will consider the child's wishes and feelings when determining what action to take and what services to provide.

Our staff are trained to be vigilant and proactive in recognising and reporting any concerns. As trained observers and advocates for the children, they are always on the lookout for any changes in a child's temperament, notice any marks or bruises on the children, and use reporting systems to escalate any concerns. This ensures that we are always alert to any potential issues, such as signs of physical or emotional abuse, neglect, or exploitation.

To achieve this, we will:

- a. We will put in place secure and confidential systems for children and young people to confidently report abuse, such as Talking Mats. This confidentiality ensures that their concerns are heard and addressed without fear of reprisal, providing a reassured environment for our children and young people
- b. Ensure our reporting systems are well promoted, easily understood and easily accessible for children and young people and their advocates, who could be their parents, guardians, or trusted adults
- c. Make it clear to children and young people that their concerns will be taken seriously, and that they can safely express their views and give feedback
- d. Reassure children and young people that they are safe and can express themselves fully. This reassurance is a cornerstone of our safeguarding policy, ensuring that our children and young people feel secure and protected

10.1 Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, such as cyberbullying, explicit content, or online predators, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our charity aims to:

- a. Have robust processes, including regular audits and updates of our filtering and monitoring systems, to ensure the online safety of children, young people, staff, volunteers and trustees
- Protect and educate the Log Cabin community in its safe and responsible use of technology, including mobile and innovative technology (which we refer to as 'mobile phones')
- c. Set clear and comprehensive guidelines for the use of mobile phones in the Log Cabin community, providing a clear path for safe and responsible use.
- d. Establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns, where appropriate

All staff and parents play an essential role in helping young children learn the foundations of safe online behaviour. Even if children don't have access to technology in our setting, they may use it at home, with their friends or in other public spaces. Children are naturally curious to understand our world; it is our responsibility to enable them to do so, including helping them recognise the value of technology and use it safely. Role modelling safe use of the internet should become a powerful tool in our everyday practice, influencing the children's perception and use of technology. SEND children and young people are more at risk because many children and young people are not cognitively able to recognise danger and keep themselves safe.

Increased use of devices, such as tablets, directly with children can be a great way of role-modelling positive use of technology; however, if the activity isn't suitably planned, it can cause issues.

Early years children and children with SEND could be at risk of: Content (what they may see):

- Exposure to inappropriate videos. pictures or messages which might upset, worry or frighten them
- b. Imitating harmful or inappropriate behaviour they see online
- Searching for inappropriate content on purpose or stumbling upon it by accident. This
 would include
- d. Using voice activated tools to search for content
- e. Inadvertently giving apps or websites permission to share their location or other personal information
- f. Spending real money via in-app or in-game purchases

Contact (who might communicate with them):

- a. Being abused online (including sexually) by people they don't know, such as when gaming or using video chat
- b. Being abused online (including sexually) by people they know, such as friends and family members
- c. Sending images or information to people on the device's contact list

Conduct (how they might behave):

- a. Exhibiting unhealthy behaviours and boundaries around their use of screens
- b. Being unkind to each other online as well as offline; this could be using mean words or by excluding others from their games
- c. Using words or terminology which are not appropriate for their age
- d. Engaging in unhealthy relationships
- e. As part of natural development, early years children may exhibit curiosity about their own and others' private body parts; if this occurs via technology children may be at risk of taking inappropriate or indecent images and videos of themselves the Brook traffic light tool can help practitioners to determine whether sexual behaviour is normal healthy sexual development or harmful behaviour which is a cause for concern

It's important to remember that parents and carers play a crucial role in safeguarding their children online. The risks to early years children or those with SEND can be heightened by the online behaviour of their parents/carers, such as oversharing information about their children (or other children) online. This could include details that could identify a child or the Log Cabin. While the decision to share images of children is a personal one, it's vital to exercise caution with privacy settings to maintain some control over who can access these images.

It's essential for parents and carers to be mindful of their own personal vulnerabilities, as these can inadvertently place their children at risk. For instance, they may be at risk of exposure to radicalisation. Additionally, children could be neglected because of their parents or carers overuse

of the internet, or because of parents or carers failing to safeguard them online. For further information, refer to the NSPCC definitions and signs of child abuse document.

As key stakeholders in the safety of children online, your role is crucial Strategies to minimise risk include:

- a. Check apps, websites, and search results before using them with children is a significant step in ensuring their safety. Children in Early Years should always be supervised when accessing the internet.
- b. Ensure safety modes and filters are applied default settings tend not to ensure a high level of privacy or security. But remember you still need to supervise children closely
- c. Role model safe behaviour and privacy awareness. Talk to children about safe use, for example ask permission before taking a child's picture even if parental consent has been given.
- d. Use home visits to inform your understanding of how technology is used within the home and the context of the child's use of technology. Where appropriate.
- e. Check privacy settings to ensure personal data is not being shared inadvertently or inappropriately.

Steps to consider <u>Online Safety for Individuals on the Autism Spectrum - Autism Society of NC (autismsociety-nc.org)</u> (Autism society North Carolina)

To address this, our charity aims to:

- a. Have robust processes in place to ensure the online safety of children and young people, staff, volunteers, and trustees
- Protect and educate the Log Cabin community in its safe and responsible use of technology, including mobile and innovative technology (which we refer to as 'mobile phones')
- c. Set clear guidelines for the Log Cabin community on the use of mobile phones
- d. Establish clear mechanisms to identify, intervene, and escalate any incidents or concerns, where appropriate

11. Most children and young people who attend the Log Cabin have special educational needs, disabilities or health issues

At the Log Cabin, we are committed to safeguarding all children and young people, especially those with SEND or certain health conditions. We recognise that they can face additional challenges and are 3 times more likely to be abused than their peers. We are dedicated to addressing these issues. Additional barriers can exist when recognising abuse and neglect in this group, including

- a. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- b. Children and young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children and young people.
- c. The potential for children and young people with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.

These barriers can include difficulties in expressing oneself, understanding complex instructions, or even recognising when one is being mistreated. All these factors can make it harder for children with SEND to manage or report abuse or neglect.

We operate a keyworker system that aims to strengthen the relationship with key adult at the Log Cabin who can support or speak as an advocate for the child. This key adult, often a support worker, is responsible for understanding the child's unique needs, ensuring their safety, and advocating for them.

It's important to note that any abuse involving children and young people with SEND will require close liaison with the DSL (or deputy) and the SBL. This coordination is crucial to ensure that all necessary steps are taken to address the situation.

11.1 . Children and young people with a social worker

Children and young people may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

a. Responding to unauthorised absence or missing education where there are known safeguarding risks

12. Complaints and concerns about the Log Charity safeguarding policies

12.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

12.2 Other complaints

The Log Cabin Charity complaints procedure is not limited to parents or carers of children that are registered at the charity. Any person, including members of the public, may make a complaint to The Log Cabin Charity about any provision of facilities or services that we provide. Unless complaints are dealt with under separate statutory procedures (such as appeals relating to exclusions or admissions), we will use this complaints procedure.

The Complaints Procedure is accessible for on the charity website – contact us page.

12.3 Whistle-blowing

The Log Cabin Charity Whistleblowing Policy is available on the Log Cabin website – policy page.

- b. What areas of malpractice or wrongdoing are covered by the procedures
- c. The options available for reporting a concern, including who to approach within the charity and externally
- d. How the charity will respond to such concerns
- e. What protection is available to staff who report another member of staff

13. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- a. A clear and comprehensive summary of the concern
- b. Details of how the concern was followed up and resolved
- c. A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period after they have left the Log Cabin.

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

If a child for whom the charity has, or has had, safeguarding concerns moves to another provider, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main child/young person file.

To allow the new provider to have support in place when the child arrives, this should be within:

- a. 5 days for an in-year transfer, or within
- b. The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving provider and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Child/young person records can be downloaded as a PDF – this is then scanned and sent to the DSL.

In addition:

- a. Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- b. Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

14. Training

14.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the charity's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- a. Be integrated, aligned and considered as part of the Log Cabin safeguarding approach and wider staff training, and activities planning
- b. Be in line with advice from the 3 safeguarding partners
- c. Have regard to the Staffs' Standards to support the expectation that all staffs:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all children and young people

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Volunteers will receive appropriate training, if applicable.

14.2 The DSL and deputy

The DSL and deputy will undertake child protection and safeguarding training annually or at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

14.3 Trustees

All trustees receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- a. Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- b. Can be assured that safeguarding policies and procedures are effective and support the charity's to deliver a robust charity approach to safeguarding

As the chair of trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the head of service, they receive training in managing allegations for this purpose.

14.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the charity will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

14.5 All staff who have contact with children and young people and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

15. Monitoring arrangements

This policy will be reviewed **annually** by the DSL. At every review, it will be approved by the full trustee board.

16. Links with other policies

This policy links to the following policies and procedures:

Behaviour

Complaints

Health and safety

Online safety

Mobile phone use

Intimate care

Equality

6. Staff Guidance Flow Diagram

What to do if you have concerns for the safety of a child or young person or in the case of allegations about a member of staff

You are approached by a child or young with a disclosure that they are being, or have been harmed or abused or neglected

or you are informed of such a disclosure by a staff member, volunteer or member of the public

or You are concerned that a child or young person, may be subject to, abuse or harm.

1

Make a written note of the information/ observation, and include a record of the time, date and person present

Inform your line manager as soon as possible.

1

Line manager will evaluate the incident and/or make a referral to the Designated Safeguarding Lead (DSL) If line
manager not
available
contact your
Senior Staff or
the
Designated
Safeguarding
Lead (DSL).

You are concerned that the behaviour of a member of staff or other person is threatening, or potentially threatening, the well-being of a child or young person.



Report your concerns immediately to your line manager, Designated Safeguarding Lead (DSL). Where appropriate, relevant HR procedures may be initiated and may result in formal disciplinary action being taken and/or a referral made to an external agency.



In all situations, you must provide an outline of your concerns in writing, If the matter is referred to external authorities, you may be asked to provide a formal statement of your concerns for subsequent external investigations.



NB: If you have immediate concerns that a child or young person is at risk of significant harm, contact your line manager. If you think a criminal offence has been committed contact the Police and the Designated Safeguarding Lead (DSL)

7. The Designated Safeguarding Lead (DSL) - reporting procedure for concerns

7.1 Behaviour of a staff member, Trustee, volunteer, agencies, freelancer or consultant (e.g. allegation about behaviour towards a child or young person)

Concerns arise about the behaviour of a member of staff, Trustees, volunteer, agencies, freelancer or consultant towards a child/children or young person(s) (e.g. suspicions or allegations of poor practice or possible abuse)

Individual alerted to concerns reports to line manager/senior staff and Designated Safeguarding Lead (DSL). Completes the safeguarding incident report form and Designated Safeguarding Lead (DSL takes appropriate follow up action (see appendix 3)

Designated Safeguarding Lead (DSL) (if appropriate in consultation with external agencies) determines the route for further action to be taken (e.g. does the matter appear to be poor practice or possible abuse, and records action taken and agreed)

Poor Practice/ Breach of code of conduct



Concern dealt with as misconduct issue using complaints/ disciplinary procedures as appropriate (in consultation with LADO if appropriate).



Disciplinary investigation undertaken and hearing held.



Outcome of disciplinary process (e.g. no case to answer, advice or warning given, training/ support required, other sanctions, or exclusion). Consideration of referral to DBS, if appropriate.



Disciplinary appeals process

Possible Abuse/ Criminal offence



In consultation with statutory agencies and LADO. Designated Safeguarding Lead (DSL) consults with refers to HR re initiating disciplinary procedures, immediate temporary suspension (without prejudice) and notification of other organisations



Disciplinary process initiated – investigation may be delayed pending outcome of statutory agencies' processes. Support from LADO



Full disciplinary investigation undertaken, and hearing held outcomes and possible appeal.



Designated Safeguarding Lead (DSL) consults with/refers to Children's Services, Adult Services /Police and LADO and follows this up in writing within 24 hours.



Children's Services and/or Police hold Strategy meeting (may include Charity representative) and agree investigation process



Outcome of Children's Services, or Police investigation (e.g. NFA, criminal prosecution, assessment of risk etc.)

7.2 Behaviour of another organisation's staff member, Trustee, freelancer, volunteer or consultant (e.g. allegation about behaviour towards a child, young person or adult at risk)

Concerns arise about the behaviour of a member of staff or volunteer from another organisation towards a child/children, young person(s)

(e.g. suspicions or allegations of poor practice or possible abuse)



Individual alerted to concerns reports to organisation/member of Log Cabin staff. Designated Safeguarding Lead (DSL) completes the safeguarding incident report form and takes appropriate follow up action (see below)



Designated Safeguarding Lead (DSL) (if appropriate in consultation with external agency) determines the route for further action to be taken (e.g. does the matter appear to be poor practice or possible abuse, and records action taken and agreed)



Poor Practice/ Breach of code of conduct



Inform subject of concerns of intention to pass information to employing/ deploying organisation Designated Safeguarding Lead (DSL) in line with safeguarding policy and/or any inter-organisation information sharing arrangements



Contact Designated Safeguarding Lead (DSL) in employing /deploying organisation and pass on concerns. Record actions and plans agreed. Follow up in writing within 24 hours cc'ing the individual.



Possible Abuse/ Criminal offence



If matter appears urgent and indicates a high level of risk to children or young people, either contact Children's' Services, or Police direct to refer,

or Contact the Designated Safeguarding Lead (DSL) in the individuals employing/deploying organisation to pass on the information. Secure and record their commitment to refer to statutory agencies and seek confirmation when this has been undertaken. If not agreed – contact statutory agencies directly.



Designated Safeguarding Lead (DSL) records actions and plans agreed and follows up referrals in writing within 24 hours.

Contact List Safeguarding reporting your concerns

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Sharon Flynn	Sharon@logcabincharity.org.uk 020 8840 3400
Deputy DSL	Daniel Yap	Daniel@logcabincharity.org.uk 020 8840 3400
Local authority designated officer (LADO	Natalie Cernuda,	LADO (Local Authority Designated Officer): Natalie Cernuda Quality Assurance, Safeguarding, Review and LADO Services Ealing Children Services Perceval House (2/NW/3) 14-16 Uxbridge Road London W5 2HL
)		Mobile: 07890940241 Landline: 020 8825 8930 Email: <u>asv@ealing.gov.uk</u>
Chair of Trustees	William Hardman	Trustees@logcabincharity.org.uk 020 8840 3400
NSPCC Helpline	NSPCC	You can contact the NSPCC Helpline by calling 0808 800 5000 or emailing help@NSPCC.org.uk. Helpline is 10am-8pm Mon to Friday.
Ealing <u>families directory</u>	Police	Ealing Directory (ealingfamiliesdirectory.org.uk) Police: 101 (non-emergency) or 999 (emergency) Police Central Referral Unit 0845 605 1166 Anti-terrorist hotline: 0800 789 321 ChildLine 0800 1111 If you're worried about a child/ young person Report a concern help@nspcc.org.uk NSPCC: 0808 800 500 Ofsted: 0300 123 1231

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- a. Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- b. Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- c. Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- d. Seeing or hearing the ill-treatment of another
- e. Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- a. Physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- b. Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- a. Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- b. Protect a child from physical and emotional harm or danger
- c. Ensure adequate supervision (including the use of inadequate care-givers)
- d. Ensure access to appropriate medical care or treatment

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

Please refer to NSPCC website Types of Child Abuse & How to Prevent Them | NSPC

Sexual Abuse & Sexual Exploitation: Sexual abuse involves forcing or enticing a child/young person to take part in sexual activities, including sexual exploitation, whether or not they are aware of what is happening, and whether it is for money or reward or not. The activities may involve physical contact, including penetrative contact (e.g. rape and buggery) or non-penetrative acts.

They may include non-contact activities, such as involving children/young people in seeing or receiving or sending sexually suggestive emails or text-messages, or inappropriate behaviour on the Internet, involving them looking at, or in the production of, pornographic material of watching sexual activities, or encouraging them to behave in sexually inappropriate ways.

Disability is defined as A major physical impairment, severe illness and/or a moderate to severe learning difficulty, an ongoing high level of dependency on others for personal care and the meeting of other basic needs.

Bullying: Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling) and emotional (e.g. isolating an individual from the activities and social acceptance of their peer group). There is increasing use of new technologies as a tool for bullying, and such incidents should be taken seriously.

Self-Harming Behaviour: Children/young people who harm or attempt to harm themselves should be taken seriously. The self-harming behaviour in itself may cause impairment of their health or development and, in some circumstances, present significant harm or the risk of significant harm. Self-harming behaviour may also arise alongside eating disorders and/or drug misuse. Female Genital Mutilation (FGM):

Female genital mutilation is a collective term for procedures that include the removal of part or all the external female genitalia for cultural or other nontherapeutic reasons. The practice is medically unnecessary, extremely painful and has serious physical and mental health consequences both at the time and in later life. The procedure is typically performed on girls of 4 -13 years but may be performed on new born babies or on young women. FGM can result in death.

FGM is a criminal offence (Prohibition of Female Circumcision Act 2003 and subsequent amendments by the Serious Crime Act 2015). Under the act it is an offence to arrange, procure, aid or abet female genital mutilation. Parents/carers may be liable under this act. It is also an offence to allow the procedure to be undertaken in another country. When agencies become aware that a girl is at risk of FGM, a referral should be made to Children's Social Care. Forced Marriage: A forced marriage is one that is conducted without the full consent of both parties and where duress is a factor.

Forced marriage can amount to sexual and emotional abuse and make children/young people susceptible to physical abuse. In circumstances where there are concerns that someone is at imminent risk of a forced marriage, urgent referrals should be made to Children's Adults' Social Care.

In the case of a child/young person in danger of forced marriage, it is likely that an initial discussion with the parent, carer or other community member may significantly increase the level of risk to the person.

Online abuse: Online abuse is any abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. It's important to be aware that it can take place anywhere and anytime, keeping us alert and prepared to address this prevalent issue.

Online child sexual abuse: When sexual exploitation happens online, young people may be persuaded, or forced, to:

Online child sexual abuse: When sexual exploitation happens online, young people may be persuaded, or forced, to:

- a. send or post sexually explicit images of themselves
- b. take part in sexual activities via a webcam or smartphone
- c. have sexual conversations by text or online.

Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the sexual abuse has stopped.

Online bullying or cyberbullying:

Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks, games, and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images, or videos.

Cyberbullying includes:

- a. sending threatening or abusive text messages
- b. creating and sharing embarrassing images or videos
- c. 'trolling' sending menacing or upsetting messages on social networks, chat rooms or online games
- d. excluding children from online games, activities or friendship groups
- e. setting up hate sites or groups about a particular child/young person
- f. encouraging young people to self-harm
- g. voting for or against someone in an abusive poll
- h. creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- i. sending explicit messages, also known as sexting
- j. pressuring children into sending sexual images or engaging in sexual conversations

Online grooming: Grooming is when someone builds an emotional connection with a child/young person to gain their trust for the purposes of sexual abuse, sexual exploitation, or trafficking. Groomers can use social media sites, instant messaging apps including teen dating apps, or online gaming platforms to connect with a young person or child. They can spend time learning about a child/young person's interests from their online profiles and then use this knowledge to help them build up a relationship. It's easy for groomers to hide their identity online – they may pretend to be a child/young person and then chat and become 'friends' with children they are targeting

Groomers no longer need to meet children/young people in real life to abuse them. Increasingly, groomers are sexually exploiting their victims by persuading them to take part in online sexual activity.

Sexting: Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually-explicit messages. They can be sent using mobiles, tablets, smartphones, laptops etc — any device that allows you to share media and messages. Sexting may also be called 'trading nudes', 'dirties' or 'pic for pic'. The creating or sharing of explicit images of a child/young person is illegal, even if the person doing it is a child/young person

Cuckooing: Cuckooing is the process whereby criminal gangs target the homes of vulnerable people in order to use their premises for criminal activity. Many of the victims are particularly vulnerable and criminal gangs may use threats and intimidation to gain access to the property to engage in criminal activity such as drug dealing, sexual exploitation etc.

Criminal exploitation: county lines; Criminal exploitation of children or vulnerable adults is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns

Peer on peer abuse; Children/young people can abuse other children/young people. It can take many forms including: bullying; sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals. Sexual violence and sexual harassment can occur online and offline. Evidence shows that girls, children/young people with special education and needs disabilities (SEND) and lesbian, gay, bisexual and transgender (LGBT) children/young people are at greater risk. Peer on peer abuse tends to be experienced by children/young people aged 10 and upwards, with those abusing them being slightly older. Signs of possible peer on peer abuse include but are not limited to:

physical injuries - drug and alcohol abuse - going missing - committing criminal offences - disengagement from charity - poor mental health - sexual health concerns

Trafficking: Children/young people can be trafficked into, within and out of the UK for many reasons and all different types of exploitation. Trafficking is a form of child abuse and needs an appropriate safeguarding response. Any child/young person who is recruited, transported, transferred, harboured or received for exploitative reasons is considered to be a victim of trafficking, whether or not they have been forced or deceived. This is because it is not considered possible for children/young people in this situation to give informed consent. Even when they understand what has happened, they may still appear to submit willingly to what they believe to be the will of their parents or accompanying adult. It is important these children/young people are protected too.

Children/young people are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud, forced marriage, begging and involvement in criminal activity such as pick pocketing, theft and working on cannabis farms. They are likely to be subjected to

other forms of abuse, as a means of coercing and controlling them. Trafficking is carried out by individual adults and organised crime groups

The legal age of sexual consent activity involving a young person is 16 years is not abusive, but it may be, and a child or young person's ability to consent can be impaired due to lack of freedom, capacity or choice; for example because of an age/power imbalance; because it is leading into sexual exploitation; because one person is in a position of trust with the other (e.g. a key worker); where one person is vulnerable because of disability or capacity; where the child/young person is in the care of another away from home. A person consents to any sexual activity if he or she agrees by choice, and has the freedom and capacity to make that choice according to the Sexual Offences Act (2003)

Appendix 2-Safer recruitment

Our single central record (SCR) records information on the checks carried out on staff and volunteers. Copies of these checks, where appropriate, will be located in individuals' personnel files. We follow the guidance from Keeping Children Safe in Education and best practice, as outlined below.

New staff

When appointing new staff, we will:

- verify a candidate's identity, including checking the name on a birth certificate where this
 is available
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- · verify the candidate's mental and physical fitness to carry out their work responsibilities
- verify the person's right to work in the UK
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate
- verify professional qualifications, as appropriate
- ensure a candidate to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State
- Seek two references, including from the current employer, before interview and ask specific questions about the suitability of the candidate to work with children
- ensure that appropriate checks are made to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2018
- Conduct online searches on shortlisted candidates, reviewing publicly available material for any incidents or issues and notify applicants of this process

Agency and third party staff

For agency and third party staff, we will include written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date the confirmation was received and whether an enhanced DBS certificate check has been provided.

Trainee/student teachers

Where applicants for initial teacher training are salaried by the school, we will carry out all necessary checks. Where trainee teachers are fee-funded, we will ensure that the training provider has carried out the necessary checks and obtain written confirmation that these checks have been carried out.

Existing staff

If we have any concerns about an existing member of staff's suitability to work with children, we will carry out the relevant checks as if the member of staff were a new member of staff. If a member of staff moves from a post that is not in regulated activity to a post in regulated activity, we will ensure the relevant checks for that regulated activity have been carried out.

We will follow our legal duty to refer to the DBS if a member of staff has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left

Volunteers

We will never leave an unchecked volunteer to be left unsupervised or to work in regulated activity. We will obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity. We will undertake a risk assessment when deciding whether to undertake an enhanced DBS certificate for any volunteer not engaging in regulated activity, and retain a record of this risk assessment.

Trustees

All trustees will have an enhanced DBS check without barred list information. A barred list check will be completed if a governor is in regulated activity

Contractors

We will ensure that any contractor whose work provides them with the opportunity for contact with children will have the appropriate checks. Those contractors engaging in regulated activity will have an enhanced DBS check including barred list information.

For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check will be required. If the contractor is engaged in regulated activity then an enhanced DBS check with children's barred list will be required.

Appendix 3: allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply staff, volunteer or contractor, has:

- a. Behaved in a way that has harmed a child, or may have harmed a child, and/or
- b. Possibly committed a criminal offence against or related to a child, and/or
- c. Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- d. Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of the Log Cabin

If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the head of service, or the chair of trustees where the head of service is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- a. Providing an assistant to be present when the individual has contact with children
- b. Redeploying the individual to alternative work in the charity so that they do not have unsupervised access to children
- c. Moving the child or children in a area where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

If in doubt, the case manager will seek views from the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- a. **Substantiated:** there is sufficient evidence to prove the allegation
- b. **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- c. False: there is sufficient evidence to disprove the allegation
- d. **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

e. **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- b. Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- c. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- d. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the charity is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- e. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- f. If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the charity and their contact details
- g. If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- h. If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action at the Log Cabin and/or liaise with the police and/or children's social care services as appropriate

- i. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- j. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against staffs (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a staff will be advised to seek legal advice
- k. Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child no information will be shared regarding the staff member)
- I. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the charity is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from working, pending the findings of the investigation.

Where the police are involved, wherever possible the charity will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the charity's disciplinary process, should this be required at a later point.

Additional considerations for supply staffs and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the charity, such as a supply staff or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- a. We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- b. The trustees board will discuss with the agency whether it is appropriate to suspend the individual, while the charity carries out the investigation
- c. We will involve the agency fully, but the charity will take the lead in collecting the necessary information and providing it to the LADO as required
- d. We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- a. Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- b. If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- c. If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the charity ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the charity will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the charity will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the Log Cabin.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- a. Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- b. Shown to be deliberately invented, or malicious, the charity will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- a. Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- b. Shown to be deliberately invented, or malicious, the charity will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The charity will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- a. Who needs to know about the allegation and what information can be shared
- b. How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- c. What, if any, information can be reasonably given to the wider community to reduce speculation
- d. How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- a. A clear and comprehensive summary of the allegation
- b. Details of how the allegation was followed up and resolved
- c. Notes of any action taken, decisions reached and the outcome
- d. A declaration on whether the information will be referred to in any future reference

In these cases, the charity will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the charity's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- a. Issues arising from the decision to suspend the member of staff
- b. The duration of the suspension

- c. Whether or not the suspension was justified
- d. The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the charity that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply staffs, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- a. Suspicion
- b. Complaint
- c. Safeguarding concern or allegation from another member of staff
- d. Disclosure made by a child, parent or other adult within or outside the charity
- e. Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the charity may have acted in a way that:

- a. Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- b. Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- a. Being overly friendly with children
- b. Having favourites
- c. Taking photographs of children on their mobile phone
- d. Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- e. Humiliating children and young people

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- b. Empowering staff to share any low-level concerns as per section 10.8 of this policy
- c. Empowering staff to self-refer
- d. Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- e. Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- f. Helping to identify any weakness in the 's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the head of service will collect evidence where necessary by speaking:

- a. Directly to the person who raised the concern, unless it has been raised anonymously
- b. To the individual involved and any witnesses

The head of service will use the information collected to categorise the type of behaviour and determine any further action, in line with the charity's [staff code of conduct. The head of service will be the ultimate decision-maker in respect of all low-level concerns

<u>Developing and implementing a low-level concerns policy: A guide for organisations which work with children</u>

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- a. Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- b. Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- c. Retained at least until the individual leaves employment at the charity

Where a low-level concern relates to a supply staff or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- a. The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- b. The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: specific safeguarding issues

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- a. Are at risk of harm or neglect
- b. Are at risk of forced marriage or FGM
- c. Come from Gypsy, Roma, or Traveller families
- d. Come from the families of service personnel
- e. Go missing or run away from home or care
- f. Are supervised by the youth justice system
- g. Cease to attend a services
- h. Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the charity without a new charity being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- a. Appearing with unexplained gifts or new possessions
- b. Associating with other young people involved in exploitation
- c. Suffering from changes in emotional wellbeing
- d. Misusing drugs and alcohol
- e. Going missing for periods of time or regularly coming home late
- f. Regularly missing services or education
- g. Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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 may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- a. Having an older boyfriend or girlfriend
- b. Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of charity. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

The Log Cabin Charity has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- a. Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- b. Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing
 physical harm (this may include an online element which facilitates, threatens and/or
 encourages physical abuse)
- d. Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- e. Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- f. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- g. Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- h. Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- i. Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 10 of this policy, as appropriate. In particular, section 10.8 and 10.9 set out more detail about our charity's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police may inform the key adult in the charity (usually the designated safeguarding lead) before the child or children arrive at the Log Cabin the following day

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputy will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a child/young person is at risk of FGM.

Indicators that FGM has already occurred include:

- a. A child/young person confiding in a professional that FGM has taken place
- b. A mother/family member disclosing that FGM has been carried out
- c. A family/child/young person already being known to social services in relation to other safeguarding issues
- d. A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from charity, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a child/young person may be at risk of FGM include:

- a. The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- b. FGM being known to be practised in the girl's community or country of origin
- c. A parent or family member expressing concern that FGM may be carried out
- d. A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- e. A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the
 practice is prevalent, or parents/carers stating that they or a relative will take the
 girl out of the country for a prolonged period
 - Requesting help from a staff or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from charity
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a child/young person is being forced into marriage, they will speak to the child/young person about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- a. Speak to the child/young person about the concerns in a secure and private place
- b. Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- c. Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- d. Refer the child/young person to an education welfare officer, pastoral tutor, learning mentor, or charity counsellor, as appropriate

Preventing radicalisation

- a. **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- b. **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- c. Terrorism is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The Charity have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our charity being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our children and young people to stay safe online at charity and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in children and young people' behaviour.

The government website <u>Educate Against Hate</u> and charity <u>NSPCC</u> say that signs that a child/young person is being radicalised can include:

- a. Refusal to engage with, or becoming abusive to, peers who are different from themselves
- b. Becoming susceptible to conspiracy theories and feelings of persecution
- c. Changes in friendship groups and appearance
- d. Rejecting activities they used to enjoy
- e. Converting to a new religion
- f. Isolating themselves from family and friends
- g. Talking as if from a scripted speech
- h. An unwillingness or inability to discuss their views
- i. A sudden disrespectful attitude towards others
- j. Increased levels of anger
- k. Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- m. Accessing extremist material online, including on Facebook or Twitter
- n. Possessing extremist literature
- o. Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a child/young person, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

Sexual violence and sexual harassment between children in the Log Cabin

Sexual violence and sexual harassment can occur:

- a. Between 2 children of any age and sex
- b. Through a group of children sexually assaulting or sexually harassing a single child or group of children
- c. Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same charity.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- a. Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- b. Regularly review decisions and actions, and update policies with lessons learnt
- c. Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- d. Consider if there are wider cultural issues within the charity that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- e. Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- a. Challenging inappropriate behaviours
- b. Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- c. Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 10 of this policy, as appropriate. In particular, section 10.8 and 10.9 set out more detail about our charity's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- a. Increased absence from charity
- b. Change in friendships or relationships with older individuals or groups
- c. Significant decline in performance
- d. Signs of self-harm or a significant change in wellbeing
- e. Signs of assault or unexplained injuries
- f. Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- a. Being male
- b. Having been frequently absent or permanently excluded from charity
- c. Having experienced child maltreatment
- d. Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a child/young person being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the Log Cabin who are visiting for a professional purpose, such as educational psychologists and LA officers, will be asked to show photo ID and:

- a. Will be asked to show their DBS certificate, which will be checked alongside their photo ID;
- b. The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors will be accompanied by a member of staff at all times. We will not invite into the charity anyone who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using charity facilities is not seeking to disseminate extremist views or radicalise children and young people or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- a. Contact parent and second agreed contact number (telephone and text)
- b. Inform Service or Playground Manager and DSL giving details of attempt to contact
- c. If necessary an emergency referral will be made to social care and/or the police
- d. A senior leader will always be present on site until the last child leaves
- e. The child will remain in charity with familiar staff who can meet their needs

- f. If a child requires emergency medical at charity nurse or trained member of staff will stay with the child to support them if they have a seizure
- g. If a child has behaviours that challenge a trained member of staff will support them
- h. A member of staff will cover reception to allow for security and phone contact at all times

Missing children and young people

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

a. Children known to abscond will have a behaviour support plan and risk assessment in place which will include heightened supervision for times of high risk (transition, playtime, community visits). Photograph on file for easy access to print/send to police.

If a child goes missing, we will:

Abscond from the Log Cabin:

If in sight, then member of staff to remain with child

Alert senior staff immediately by using emergency call button

Alert any member of charity staff to help or get help

If outside of the Log Cabin alert member of the public to help or to contact The Log Cabin Charity If out of sight, then full search of the Log Cabin building and grounds

Senior staff member co-ordinate the response (detailed account, time frame, direction, specific interests/compulsions (e.g. bus/tube/park)

All available staff on site assist in search of the Log Cabin grounds

If known to have climbed over fence – alert neighbours Northfields Station and Bramley Road (door to door)

Any incidents of absconding will be reported to the parents as soon as possible, there will be a debrief at the end of the day and the Playground Manager will be reviewed/updated. A record will be made and actions taken to safeguard the child in future will be recorded.

Code of behaviour Appendix 5

- DO always put this code into practice
- DO treat everyone with dignity and respect
- DO set an example you would wish others to follow
- DO treat all young people equally show no favouritism
- DO plan activities that involve more than one other person being present, or at least are within sight and hearing of others
- DO follow the recommended adult/children/young people ratios for meetings and activities
- DO respect a young person's right to personal privacy
- DO avoid unacceptable situations within a relationship of trust e.g. a sexual relationship with a young person over the age of consent
- DO have separate sleeping accommodation for young people, adults and young leaders working with a younger section
- DO allow young people to talk about any concerns they may have
- DO encourage others to challenge any attitudes or behaviours they do not like
- DO avoid being drawn into inappropriate attention seeking behaviour e.g. tantrums and crushes
- DO ensure a no alcohol policy when young people are in your care adults and young people
- DO make everyone aware of the Log Cabin's child protection procedures young people, parents/carers, young leaders and other helpers
- DO remember this code even at sensitive moments e.g. when responding to bullying, bereavement or abuse
- DO keep other staff informed of where you are and what you are doing
- DO remember someone else might misinterpret your actions, no matter how well-intentioned
- DO take any allegations or concerns of abuse seriously and refer immediately
- DO NOT trivialise abuse
- DO NOT form a relationship with a young person that is an abuse of trust
- DO NOT permit abusive peer activities e.g. initiation ceremonies, bullying
- DO NOT engage in inappropriate behaviour or contact physical, verbal, sexual
- DO NOT play physical contact games with young people
- DO NOT make suggestive remarks or threats to a young person, even in fun
- DO NOT use inappropriate language writing, phoning, email or internet
- DO NOT let allegations, suspicions, or concerns about abuse go unreported
- DO NOT just rely on your good name to protect you