



COMPANY WIDE SAFEGUARDING POLICY v16

February 2024

Version History

Version Information Version No.	Updated By	Updated On	Description of Changes
1.0	CEO Karen Littlewood	November 2016	Updated policy
2.0	Director of Care – Carmen Haverly	August 2018	New policy
3.0	Director of Care – Carmen Haverly Designated Safeguarding Lead – Emma Cooper	September 2018	Procedure amendments
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16.0	Pip Smith	February 2023	Updates to Sections 7 -9 in line with KCSiE 2022
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1 Monitoring and Review

Monitoring and review will be undertaken annually by the senior leadership team. The formal review will determine the efficiency with which the related duties have been discharged, by no later than the review date, or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

2 Abbreviations, Acronyms and Definitions

Abbreviation or Acronym	Description
TSCl	The Serendipity Centre Ltd
SLT	Senior Leadership Team
DSL	Designated Safeguarding Lead
DDSP	Deputy Designated Safeguarding Person
SL	Safeguarding Lead
LADO	Local Authority Designated Officer also known as Designated Officers
CSC	Children's Social Care
ASC	Adult's Social Care
PR	Parental Responsibility

2.1 Supporting information and references

2.1.1 All documentation referred to in this policy is listed in section 9 '[Standard Forms and Relevant Documents](#)' and section 10 '[Appendix 1: Statutory Legislation](#)'. This policy is written in line with Regulations 6 'The quality and purpose of care' standard and Regulation 12 'The protection of children' standard of The Children's Homes (England) Regulations 2015.

2.2 The definition of children, young people and young adults at risk

2.2.1 The Serendipity Centre Ltd (TSCL's) children's homes have children, young people and young adults at risk:

- **Children and young people are under 18.** A child is defined in the Children Act (1989 and 2004) and echoed in both Working Together to Safeguard Children (2018) and Keeping Children Safe in Education (2019). It defines a child as someone who has not yet reached their 18th birthday.
- **Young adults at risk are those who are over 18.** Government guidance can be gained from the Care Act 2014, which superseded a previous government document called, 'no secrets'. Recent government documentation has replaced the word vulnerable and use the term '**adults at risk**'. '**An adult at risk** of harm or abuse is any person who: -has needs for care and support and; -is experiencing or is at risk of abuse or neglect; and -as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect'.

2.2.2 For the purpose of this policy the terms 'young person' and 'young people' will be used to refer to all children, young people and young adults at risk in TSCL's care.

2.3 Definition of safeguarding

2.3.1 Safeguarding means protecting a young person's right to live in safety; free from abuse and neglect.

2.3.2 Working Together 2023 defines safeguarding as:

Please use the below link, to read how Working Together 2023 defines Safeguarding.
[Working together to Safeguard Children 2023](#)

2.3.3 Safeguarding young people from harm and promoting their development is everyone's responsibility.

2.4 Definition of child protection

2.4.1 **Child protection** is an aspect of safeguarding, but it is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

2.5 Definition of abuse

- 2.5.1 Abuse is a violation of a person's human and civil rights by another person, or persons, and may result in significant harm to, or the exploitation, of the person subjected to it. Abuse can be intentional or unintentional; it may be a single act or repeated acts. Abuse can happen anywhere, for example, in someone's own home, in a public place, in a hospital, in a school, in a therapy space or in a college. It can happen when someone lives alone or with others. Anyone can carry out abuse or neglect. Abuse can be:
- 2.5.2 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a young person. Physical harm may also be caused when a parent/ guardian fabricates the symptoms of, or deliberately induces, illness in a young person.
- 2.5.3 **Emotional abuse:** the persistent emotional maltreatment of a young person such as to cause severe and adverse effects on the young person's emotional development. It may involve conveying to the young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on the young person. These may include interactions that are beyond the young person's developmental capability as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing the young person frequently to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment of a young person, although it may occur alone.
- 2.5.4 **Sexual abuse:** involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming a young person 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 young people.
- 2.5.5 **Neglect:** the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a person is born, neglect may involve a parent/ guardian failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect them from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access

to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs.

- 2.5.6 Staff should refer to NICE 2009 guidance on recognising child abuse and neglect (see section 10 [‘Appendix 1: Statutory Legislation’](#)).

2.6 Definition of LADO

- 2.6.1 It is acknowledged that Working Together 2015 advised a name change from LADO (Local Authority Designated Officer) to Designated Officers (DO) or Team of Designated Officers (TDO), however, since Hampshire and Southampton Local Authorities continue to manage the children's services department they have taken the made the choice to maintain the acronym LADO (see clarification in Appendix 2 from the local LADO).

2.7 Contextual Safeguarding

- 2.7.1 In KCSiE 2019 the DfE refer to contextual safeguarding as a specific term following research by the University of Bedfordshire.
- 2.7.2 The definition of Contextual Safeguarding is “an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parentchild relationships. Therefore children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra- familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.”
- 2.7.3 TSCL will consider the various factors that have an interplay with the life of any young person about whom we have concerns and the level of influence that these factors have on their ability to be protected and remain free from harm particularly when it comes to child exploitation or criminal activity.
- 2.7.4 While this term applies to this specific definition, the notion of considering a young person within a specific context is also important. What life is like for the young person at school, within the home, within their family and within the community are key considerations when looking at any concerns.

3 Roles and Responsibilities

3.1 Designated Safeguarding Lead (DSL)

3.1.1 TSCL's DSL are senior leadership team members Sean Maguinness and Jarrod Elcock

3.2 The role of the DSL is to:

3.2.1 To support and direct where necessary the RCHM and Head Teacher lead responsibility for managing safeguarding issues and cases.

3.2.2 Refer all cases of suspected abuse or allegations of abuse to either CSC/ ASC or the LADO

- Act as a source of advice, support and expertise within TSCL when deciding to make a referral by liaising with relevant agencies
- Identify safeguarding training needs and organise training
- Participate in local safeguarding boards when required
- Evaluate and contribute to high standards of safeguarding practice at TSCL
- Work to ensure that wellbeing of young people placed in our children's homes is in constant focus and that they are guarded from harm or abuse.
- Commission an independent human resources consultant to investigate any allegation regarding the DSL or Managing Director.

3.3 Safeguarding Allegations Management Advisor

3.3.1 The DSL role automatically becomes the Safeguarding Allegations Management Advisor (SAMA) if the concern is regarding a young adult at risk in TSCL's care as opposed to a child or young person.

3.4 Deputy safeguarding leads

3.4.1 All RCHM/deputy managers will be deputy safe guarding leads. They will all receive safe guarding lead training.

3.4.2 The RCHM/deputy/on call residential managers will be on first tier on call and offer safeguarding advice to staff. They will contact SLT.

3.4.3 Deputy safeguarding leads may be responsible for managing the incident at SLT discretion.

3.5 Safeguarding Team

3.5.1 Completed safe guarding Forms are sent to the DSL and uploaded to ClearCare. This provides key staff oversight of the safeguarding issues affecting the young people within TSCL. The system enables the DSL/DDSP to review the safeguarding concerns across the whole company and note any themes or trends which require action and reduces the risk of staff working in isolation on safeguarding concerns. Additionally, the members of the safeguarding team would be expected to disseminate and embed any learning identified to the wider

TSCL workforce. The members of the safeguarding team are all employed by TSCL and adhere to their, and national, confidentiality and data protection frameworks.

- 3.5.2 The membership includes the core safeguarding team listed above (see sections 3.1 – 3.3), the deputy safeguarding leads and the responsible individual.
- 3.5.3 The rationale for this membership is underpinned by the distinctive interactions between the staff and young people across the TSCL. Staff can move fluidly between TSCL homes where the need arises and young people are encouraged (when safe to do so) to socialise with each other. Due to the unpredictable nature of the young people, those who have been requested not to socialise together due to safeguarding concerns, can and do seek each other out. For this reason it is felt appropriate and proportionate that all those in the safeguarding team have access to the incident in order to be part of the robust plans required to keep our young people safe, free from harm and offer them therapeutic support.
- 3.5.4 If the safeguarding concern centres around a member of the TSCL workforce or TSCL senior team stricter parameters are placed around the circulation of confidential information via email. Please see procedures outlined in paragraph 6.2 in section 6 [‘Procedure’](#).

4 Purpose

- 4.1.1 This policy provides staff, directly and indirectly employed by TSCL, with the guidance they need in order to keep all young people and employees safe and secure in any of our settings. TSCL is committed to safeguarding and promoting the welfare of all in our care and expects all staff to share this commitment.
- 4.1.2 This policy complies with the statutory and best practice guidance in alignment with legislation outlined in section 10 [‘Appendix 1: Statutory Legislation’](#). It also complies with Hampshire’s safeguarding policy and procedures.
- 4.1.3 All policies and procedures for safeguarding young people must be undertaken in accordance with the requirements of the local authority in which the children’s home is situated (Hampshire). In the event that the HSCB has been deemed ‘Requiring Improvement’ or ‘Inadequate’ by Ofsted (Child Safeguarding Inspection Programme) the DSL will seek further advice.
- 4.1.4 This policy and supporting information is made available to parents (as appropriate), and local authorities associated with the children’s homes to ensure that everyone is clear on how TSCL protect and safeguard young people. It will also be made available on TSCL’s website. Young people will have access to a user friendly safeguarding poster which outlines the main points of this policy (see Young Person’s Safeguarding Poster).
- 4.1.5 All staff are expected to be familiar with the Public Interest Disclosure (Whistle Blowing) Policy and Staff Code of Conduct Policy.

5 Policy

- 5.1.1 TSCL aims to provide high quality, nurturing care to the young people who reside, or are educated, with us. TSCL will not tolerate bullying or abuse from staff, visitors or between peers. TSCL also acknowledges that young people's previous experiences of trauma can impact upon how they view social interactions.
- 5.1.2 TSCL is fully committed to safeguarding the welfare of all young people. It recognises its responsibility to take all reasonable steps to promote safe practice and to protect and prevent young people from experiencing harm, abuse, exploitation and discrimination.
- 5.1.3 TSCL acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse or harm.
- 5.1.4 All TSCL staff will endeavour to work together through our policies, practices and procedures to encourage the development of an ethos which embraces difference and diversity and respects the rights of the young people in its care.
- 5.1.5 To fulfil their commitment to safeguard and promote the welfare of children and young people, TSCL must have:
- Arrangements in place to comply with statutory and mandatory requirements and that all TSCL staff are made aware of the company's arrangements for safeguarding and promoting the welfare of the young people
 - Clear priorities for safeguarding and promoting the welfare of children and young people, explicitly stated in strategic policy documents which are in accordance with national guidance and locally agreed inter-agency procedures
 - A clear commitment by senior management to the importance of safeguarding and promoting children and young people's welfare
 - A clear line of accountability within the organisation for work on safeguarding and promoting the welfare of children and young people
 - Recruitment and human resources management procedures that take account of the need to safeguard and promote the welfare of children and young people, including arrangements for appropriate checks on all staff
 - Procedures for dealing with allegations of abuse against members of staff and volunteers
 - Arrangements to ensure that all staff undertake appropriate training and supervision to equip them to carry out their responsibilities effectively, and to keep this up-to-date by refresher training and attendance at supervision at regular intervals
 - Arrangements to work effectively with other organisations to safeguard and promote the welfare of children and young people, including arrangements for sharing information
 - A clear commitment to develop and implement systems that enable children and young people to use online and mobile technology safely and reduce the risks of potentially harmful behaviours
 - A clear commitment to ensure young people are treated fairly, protected and free from discrimination on the grounds of race, religion, gender, age, disability and sexual orientation

- A culture of listening to and engaging in dialogue with young people - seeking their views in ways that are appropriate to their age and understanding, and taking account of those views in individual decisions and in the establishment or development of services
- Definitive whistle-blowing procedures, and a culture that enables issues about safeguarding and promoting the welfare of children and young people to be addressed.

5.1.6 The principles upon which the Safeguarding Policy is based are:

- The welfare of a child or young person will always be paramount
- The welfare of families will be promoted
- The rights, wishes and feelings of children, young people and their families will be respected and listened to
- Keeping children and young people safe from harm requires people who work with children and young people to share information, which is appropriate, proportionate and timely
- Those people in positions of responsibility within the organisation will work in accordance with the interests of children and young people and follow the policy outlined below

5.1.7 This document is written in accordance with Hampshire Safeguarding Children Partnerships' Policies, Working Together to Safeguard Children 2018, The Equality Act 2010, and Keeping Children Safe in Education 2019.

6 Procedure

6.1 General information

6.1.1 In recording and managing concerns regarding the abuse of young people, all staff must use

the forms as set out in this policy (refer to section 9.2 '[Applicable documents](#)').

6.1.2 All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of suspected abuse and neglect should be given the highest priority.

6.1.3 The instruction in 6.3 details the procedure to follow if you receive information about a child or staff member that concerns you.

6.2 Dealing with allegations against staff

6.2.1 If the concern involves a member of staff **do not** send an email to the safeguarding team email address.

6.2.2 Where the concern relates to any member of staff, **contact should be made directly to the DSL** via telephone and/or email; see section 3.1 '[Designated Safeguarding Lead \(DSL\)](#)' this is to maintain confidentiality.

6.2.3 If the concern is regarding the DSL, contact the DDSP or HR (see section 3.1

[‘Designated Deputy Safeguarding Person \(DDSP\)’](#). Contact can be made via the on call system if out of hours (see contact details in section 11.1 [‘Core safeguarding team contact details’](#)).

6.2.4 A member of staff can also contact
Sean Maguinness, Responsible
Individual
[sean.Maguinness@serendipity-
education.com](mailto:sean.Maguinness@serendipity-education.com) 07881 883035

6.2.5 If the concern involves the DSL or DDSP, an independent human resources consultant will be appointed to carry out the investigation.

6.2.6 Following flowchart in 6.4, the LADO or team of Designated Officers and /or Ofsted should be contacted directly if a staff member feels the concern cannot be reported internally (see contact details in section 11.3 [‘LADO contact details’](#) and section 11.4 [‘Ofsted contact details’](#)). See Appendix 2 for details regarding Hampshire’s decision to use the term LADO.

6.2.7 If a member of staff feels their concerns are not being taken seriously then they can contact the NSPCC whistle-blowing helpline number on 0800 028 0285, and email address:
help@nspcc.org.uk.

6.3 Safeguarding procedure

6.3.1 You receive information about a child or a staff member that concerns you.

1. Take any immediate action to safeguard all - ring the police/remove the staff member/separate and supervise the child/remove items. (Contact your senior on call/safeguarding lead ASAP once any immediate action is completed.
2. Keep clear and precise records of what was said and done. Avoid questioning the child and don’t promise confidentiality.
3. Once advice and support has been gained from the senior on call contact relevant professionals and complete relevant paperwork. (Social worker/EDT/LADO/REG 40/Internal records.)
4. Re-contact senior on call with any queries/questions from relevant professionals.
5. Send completed paperwork to on call and senior on call
6. Ensure ongoing support is provided to the child, closely monitor them as there may be a reaction.
7. Keep all internal management updated when needed with any updates.
8. Don’t forget to add or close off documentation as the complaint/allegation ends or progresses.
9. Don’t forget, we cannot close as that belongs to the lead person.

6.4 Allegations Management

6.4.1 Please see Care Management of Allegations Policy.

6.5 Immediate harm to the young person

6.5.1 In the case of serious harm, and/or the young person is in immediate danger, the local Police should be informed immediately and they can take instant protective action as necessary. Urgent advice should also be sought from the Local Authority in which the setting is located and the young person's placing authority if different.

6.5.2 The young person can be kept in their children's home fully supported by staff if advised to do so by these agencies and a collective multi-agency decision should be made on how to proceed (including whether to notify parents/ person(s) with PR if applicable).

6.5.3 If urgent medical attention is needed and there is a suspicion of abuse a member of staff uninvolved in the concern should take the young person to the Accident and Emergency Unit at the nearest hospital. The Local Authority should be notified and advice sought about what action the Local Authority and/or the Police will take and how the parents/person(s) with PR will be informed. Every reasonable effort should be made to inform the parents/person(s) with PR as soon as possible if a young person requires urgent hospital attention, however this should not delay any necessary medical assessment or treatment. If the suspected abuse is sexual then the medical examination should be delayed until the Local Authority and the Police can liaise with the hospital, unless the needs of the young person are such that medical attention is the priority. At all times there must be a responsible adult with the young person whether from their children's home, the Local Authority or the Police if the parents/person(s) with PR are not appropriate.

6.6 Incidents (not notifiable)

6.6.1 Sometimes young people engage in positive risk taking behaviours in order to develop, thus not all concerns will be considered 'notifiable'. A 'non-notifiable' in this policy is any concern raised that does not meet the threshold to be referred to either CSC/ASC or the LADO under safeguarding and one that can be managed internally by a member of TSCL's core safeguarding team but is still recognised to be 'of concern' and therefore must be recorded and monitored. Consider any other action needed.

6.6.2 As soon as a staff member has a cause to be concerned about a young person their priority is to safeguard the young person from any immediate harm. They must then contact the SL within that location for advice as soon as possible. If they are unavailable, the DSL can be contacted directly. Should it be out of office hours (Monday - Friday 9:00 - 17:00) then the staff member should contact the on-call manager. The on-call manager can liaise with the DSL/DDSP out of hours for advice if they consider the young person is at risk of immediate harm.

6.6.3 In discussion with the member of staff, the SL (or on call manager) will determine whether the proposed concern should be recorded, and on which Form, or whether it is

not considered to be a safeguarding concern but should be recorded on the young person's daily paperwork e.g. on their chronology / precis. They can also advise on what immediate actions need to be taken to safeguard the young person(s) and to make the environment safe.

- 6.6.4 If it is considered to be a safeguarding concern, which generates the safeguarding paperwork, the staff member raising the concern should generate a reference number by recording the reference in the location's Safeguarding Log.
- 6.6.5 With the support of a senior member of staff if necessary, the young person(s)' placing authority must be notified via their social worker (or duty social worker) following guidance in section 8.8 '[Confidentiality and information sharing](#)' if appropriate to do so.
- 6.6.9 A debrief or key work with the young person will be arranged within a timescale appropriate to the situation. Staff must record this using a Debrief or Key Work Form. All attempts to offer a debrief/key work to a young person, refusals, and where one takes place must be recorded.

6.7 Notifiable Cause for Concern

6.8 Unknown body marks

- 6.8.1 There may be occasions where young people in our care have minor injuries such as bruises, swellings, and scratches which by and large will be as a result of daily activities or for some young people as a result of self-injurious behaviour. However, all such marks must be recorded on the appropriate document, this may include a Body Map, an accident form.
Parents/ person(s) with PR (as appropriate) should always be kept informed following guidance in section 8.8 '[Confidentiality and information sharing](#)'.
- 6.8.2 All unaccounted for marks or physical changes on the body must be recorded on a Body Map and a incident Form simultaneously, including the nature and extent of any injuries, and any explanations given by the young person. The DSL will assign the appropriate SL (or in some cases, the deputy manager) to investigate the concern (the Precis and Chronology notes can be reviewed) to ascertain the reason for the marks and if no reason can be found / is disclosed. We must always keep the LA updated and if the marks are persistent we may need to Reg 40.
- 6.8.3 If necessary, medical advice should be sought and appropriate treatment offered.

7 Part 1 – High risk and emerging safeguarding issues

7.1 Contextual Safeguarding

- 7.1.1 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of our school.
- 7.1.2 All staff, but especially the designated and other nominated safeguarding leads should consider whether children are at risk of abuse or exploitation in situations outside their families.
- 7.1.3 Risk and harm outside of the family can take a variety of different forms and children can be vulnerable to sexual exploitation, criminal exploitation, and serious youth violence in addition to other risks.
- 7.1.4 TSCL will consider the various factors that can impact the life of any student about whom we have concerns. We will consider the level of influence that these factors have on their ability to be protected and remain free from harm, particularly around child exploitation or criminal activity.
- 7.1.5 What life is like for a child outside TSCL, the school gates, within the home, within the family and within the community are key considerations when the DSL is looking at any concerns.

7.2 Preventing Radicalisation and Extremism

- 7.2.1 The prevent duty requires that all staff are aware of the signs that a child may be vulnerable to radicalisation. The risks include, but are not limited to, political, environmental, animal rights, or faith-based extremism that may lead to a child becoming radicalised. All staff have undertaken e-learning training in order that they can identify the signs of children being radicalised.
- 7.2.2 There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation and the grooming of children can occur through many different methods, such as social media or the internet, and at different settings.
- 7.2.3 As part of the preventative process resilience to radicalisation will be built through the promotion of fundamental British values through the curriculum.
- 7.2.4 Any child who is considered vulnerable to radicalisation will be referred by the DSL to Hampshire children's social care, where the concerns will be considered in the MASH process. If the police prevent officer considers the information to be indicating a level of risk a "channel panel" will be convened and the school will attend and support this process.

7.3 Gender based violence / Violence against women and girls

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

7.3.1 The government has a strategy looking at specific issues faced by women and girls.

7.3.2 Within the context of this safeguarding policy the following sections are how we respond to violence against girls: female genital mutilation, forced marriage, honour-based violence and teenage relationship abuse all fall under this strategy.

7.3.1 Female Genital Mutilation (FGM)

7.3.1.1 FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies.

7.3.1.1 The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

7.3.1.2 FGM is illegal in the UK.

7.3.1.3 On the 31 October 2015, it became mandatory for teachers to report known cases of FGM to the police. 'Known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act. In these situations, the DSL and/or headteacher will be informed and the member of teaching staff must call the police to report suspicion that FGM has happened.

7.3.1.4 At no time will staff examine students to confirm concerns

7.3.1.5 For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated, the staff will inform the DSL who will report it as with any other child protection concern.

7.3.4.6 While FGM has a specific definition, there are other abusive cultural practices which can be considered harmful to women and girls. Breast ironing is one of five UN defined 'forgotten crimes against women'. It is a practice whereby the breasts of girls typically aged 8-16 are pounded using tools such as spatulas, grinding stones, hot stones, and hammers to delay the appearance of puberty. This practice is considered to be abusive and should be referred to children's social care.

7.3.2 Forced Marriage

7.3.2.1 In the case of children: 'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, *psychological, financial, sexual and emotional pressure.*' In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the U.K. is under 18.

7.3.2.2 It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice.

7.3.2.3 Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care.

7.3.2.4 Policies and practices in this school reflect the fact that while all members of staff, including teachers, have important responsibilities with regard to students who may be at risk of forced marriage, teachers and school leaders should not undertake roles in this regard that are most appropriately discharged by other children's services professionals such as police officers or social workers.

7.3.2.5 While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

- an extended absence from school/college, including truancy;
- a drop in performance or sudden signs of low motivation;
- excessive parental restriction and control of movements;
- a history of siblings leaving education to marry early;
- poor performance, parental control of income and students being allowed only limited career choices;
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.

7.3.2.6 On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

7.3.3 Honour-Based Abuse

7.3.3.1 So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is

important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

7.3.3.2 It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For example, honour-based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- convert to a different faith from the family
- are exploring their sexuality or identity

7.3.3.3 Women and girls are the most common victims of honour-based abuse however, it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

7.3.3.4 All forms of honour-based abuse are abusive (regardless of the motivation) and should be handled and escalated as such. If staff believe that a pupil is at risk or has already suffered from honour-based abuse, they will report to the DSL who will follow the usual safeguarding referral process; however, if it is clear that a crime has been committed or the pupil is at immediate risk, the police will be contacted in the first instance. It is important that, if honour-based abuse is known or suspected, communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

7.3.4 Teenage Relationship Abuse

7.3.4.1 Relationship abuse can take place at any age and describes unacceptable behaviour between two people who are in a relationship.

7.3.4.2 Research has shown that teenagers do not always understand what may constitute abusive and controlling behaviours, e.g. checking someone's 'phone, telling them what to wear, who they can/can't see or speak to or coercing them to engage in activities they are not comfortable with. The government campaign "disrespect nobody" provides other examples of abusive behaviour within a relationship.

- 7.3.4.3 This lack of understanding can lead to these abusive behaviours feeling 'normal' and therefore left unchallenged, as they are not recognised as being abusive.
- 7.3.4.4 In response to these research findings, TSCL will provide ongoing therapeutic support to help prevent teenagers from becoming victims and perpetrators of abusive relationships, by encouraging them to rethink their views of violence, abuse and controlling behaviours, and understand what consent means within their relationships. This will form part of the school's curriculum content in respect of Relationship Education.
- 7.3.4.5 If TSCL has concerns about a child in respect of relationship abuse, it will report those concerns in line with procedures to the appropriate authorities as a safeguarding concern, a crime or both.

7.4 Sexual Violence and Sexual Harassment Between Children

- 7.4.1 Sexual violence and sexual harassment (SVSH) can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 7.4.2 Within TSCL all staff receive training about sexual violence and sexual harassment and what to do if they have a concern or receive a report. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. This pattern of prevalence will not, however, be an obstacle to ALL concerns being treated seriously.
- 7.4.3 TSCL a zero-tolerance approach to SVSH. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. It cannot be described as 'banter', 'having a laugh' or 'boys being boys'.
- 7.4.4 We will also take seriously any sharing of sexual images (photos, pictures or drawings) and videos; sexual jokes, comments or taunting either in person or on social media; or on-line sexual harassment.
- 7.4.5 TSCL will follow the "Sexual violence and sexual harassment between children in schools and colleges" advice provided by the DfE.
- 7.4.6 TSCL will challenge all contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers and impose appropriate levels of disciplinary action, to be clear that these behaviours are not tolerated or acceptable. Support will be provided to victims of sexual violence and sexual harassment, and we will ensure that they are kept safe.
- 7.4.7 It is clear from the 2021 Ofsted review into SVSH in schools and colleges that the prevalence of abusive and unwanted behaviour is widespread. As such staff in the

school will remain vigilant and intervene early to prevent low level behaviours from becoming abusive experiences.

7.4.8 All staff will maintain the attitude that “It could happen here”

7.4.2 Upskirting

7.4.2.1 In 2019 the Voyeurism Offences Act came into force and made the practice of upskirting illegal.

7.4.2.2 Upskirting is defined as someone taking a picture under another person’s clothing without their knowledge, with the intention of viewing their genitals or buttocks, with or without underwear. The intent of upskirting is to gain sexual gratification or to cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

7.4.2.3 If staff become aware that upskirting has occurred, this will be treated as a sexual offence and reported accordingly to the DSL and onwards to the police.

7.4.2.4 Behaviours that would be considered as sexual harassment which may be pre-cursors to upskirting, such as the use of reflective surfaces or mirrors to view underwear or genitals, will not be tolerated and the school will respond to these with appropriate disciplinary action and education.

7.4.2.5 Young People who place themselves in positions that could allow them to view underwear, genitals or buttocks, will be moved on. Repeat offenders will be disciplined. These locations could include stairwells, under upper floor walkways, outside communal areas and toilets or sitting on the floor or laying down in corridors.

7.4.2.6 If technology that is designed for covert placement and could be used to take upskirting or indecent images is discovered within TSCL, it will be confiscated. If the technology is in location and potentially may have captured images, this will be reported to the police and left in situ so that appropriate forensic measures may be taken to gather evidence.

7.4.2.7 Any confiscated technology will be passed to the headteacher to make a decision about what happens to the items. This will be carried out under the principles set out in the government guidance on [searching, screening and confiscation](#).

7.4.2.8 If the image is taken on a mobile phone, the phone will be confiscated under the same principles. This may need to be passed to the police for them to investigate, if there is evidence that a crime has been committed.

7.4.2.9 In addition, staff at The Serendipity School recognise, acknowledge, and understand the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

7.4.2.10 Also staff will challenge physical behaviour (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.’

7.5 The Trigger Trio

- 7.5.1 The term 'Trigger Trio' has replaced the previous phrase 'Toxic Trio' which was used to describe the issues of domestic violence, mental ill-health and substance misuse which have been identified as common features of families where harm to adults and children has occurred.
- 7.5.2 The Trigger Trio are viewed as indicators of increased risk of harm to children and young people. In an analysis of Serious Cases Reviews undertaken by Ofsted in 2011, they found that in nearly 75% of these cases two or more of the triggers were present. These factors will have a contextual impact on the safeguarding of children and young people.

7.5.1 Domestic Abuse

- 7.5.1.1 The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected"

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

- 7.5.1.2 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 7.5.1.3 Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
- 7.5.1.4 Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

7.5.1.5 Indicators that a child is living within a relationship with domestic abuse may include:

- being withdrawn
- suddenly behaving differently
- anxiety
- being clingy
- depression
- aggression
- problems sleeping
- eating disorders
- bed wetting
- soiling clothes
- excessive risk taking
- missing school
- changes in eating habits
- obsessive behaviour
- experiencing nightmares
- taking drugs
- use of alcohol
- self-harm
- thoughts about suicide

7.5.1.6 These behaviours themselves do not indicate that a child is living with domestic abuse but should be considered as indicators that this may be the case.

7.5.1.7 If staff believe that a child is living with domestic abuse, this will be reported to the DSL for referral, to be considered by children's social care.

7.5.2 Parental mental health

7.5.2.1 The term 'mental ill health' is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent's/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

7.5.2.2 For children, the impact of poor parental mental health can include:

- The parent's/carer's needs or illnesses taking precedence over the child's needs
- The child's physical and emotional needs being neglected
- The child acting as a young carer for a parent or a sibling
- The child having restricted social and recreational activities
- The child finding it difficult to concentrate, potentially having an impact on educational achievement
- The child missing school regularly as (s)he is being kept home as a companion for a parent/carer
- The child adopting paranoid or suspicious behaviour as they believe their parent's delusions

- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child)
- Obsessional compulsive behaviours involving the child.

7.5.2.3 If staff become aware of any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the DSL to consider a referral to children's social care.

7.5.3 Parental Substance misuse

7.5.3.1 Substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them.

7.5.3.2 Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.

7.5.3.3 For children, the impact of parental substance misuse can include:

- Inadequate food, heat and clothing for children (family finances used to fund adult's dependency)
- Lack of engagement or interest from parents in their development, education or wellbeing
- Behavioural difficulties- inappropriate display of sexual and/or aggressive behaviour
- Bullying (including due to poor physical appearance)
- Isolation – finding it hard to socialise, make friends or invite them home
- Tiredness or lack of concentration
- Child talking of or bringing into school drugs or related paraphernalia
- Injuries /accidents (due to inadequate adult supervision)
- Taking on a caring role
- Continued poor academic performance including difficulties completing homework on time
- Poor attendance or late arrival.

7.5.3.4 These behaviours themselves do not indicate that a child's parent is misusing substances but should be considered as indicators that this may be the case.

7.5.3.5 If staff believe that a child is living with parental substance misuse, this will be reported to the designated safeguarding lead for referral to children's social care to be considered.

7.6 Young Carers

7.6.1 As many as 1 in 12 children and young people provide care for another person. This could be a parent, a relative or a sibling and for different reasons such as disability, chronic illness, mental health needs, or adults who are misusing drugs or alcohol.

7.6.2 Young People who provide care for another are Young Carers. These young people can miss out on opportunities, and the requirement to provide care can impact on school attendance or punctuality, limit time for homework, leisure activities and social time with friends.

7.6.3 As a school we may refer a young carer to children's social care for a carers assessment to be carried out. We will consider support that can be offered and make use of the resources and guidance from Save the Children in their young carers work.

7.7 Missing, Exploited and Trafficked Children (MET)

7.7.1 Within Hampshire, the acronym MET is used to identify all children who are missing; believed to be at risk of or are being exploited; or who are at risk of or are being trafficked. Given the close links between all these issues, there has been a considered response to view them as potentially linked, so that cross over of risk is not missed.

7.7.2 Children Missing from Education

7.7.2.1 Patterns of children missing education can be an indicator of either abuse or safeguarding risks. A relatively short length of time a child is missing does not reduce risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns.

7.7.2.2 Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

7.7.2.3 The DSL and staff should consider information that is shared by the child's school or college:

- Missing education sessions/lessons that are being reported by the child's school/college: Are there patterns in the lessons that are being missed? Is this more than avoidance of a subject or a teacher? Does the child remain on the school site or are they absent from the site?
- Is the child being exploited during this time?
- Have they been directly or indirectly affected by substance misuse?
- Are other students know to the child routinely missing the same lessons and does this raise other risks or concerns such as SVSH between children, exploitation, gang behaviour or substance misuse?
- Is the lesson being missed one that would cause bruising or injuries to become visible?

7.7.2.4 Single missing days: Is there a pattern in the day missed? Is information about missing days or missing periods during the day being reported to TSCL

- Is the child being sexually exploited during this day?
 - Is the child avoiding abusive behaviour from peers or staff on this day?
 - Do the parents appear to be aware and are they condoning the behaviour?
 - Are the pupil's peers making comments or suggestions as to where the pupil is?
 - Can the parent be contacted and made aware?
-
- Continuous missing days: Has the school made contact with RHMS to establish reasons for non-attendance? Is medical evidence being requested and /or provided to explain non-attendance?
 - Did we have any concerns about radicalisation, FGM, forced marriage, honour- based violence, sexual exploitation?
 - Have we had any concerns about physical or sexual abuse?

7.7.2.5 As any school will view absence as both a safeguarding issue and an educational outcomes issue. The school may take steps that could result in legal action for attendance, or a referral to children's social care, or both.

7.7.3 Children Missing from Home or Care

7.7.3.1 It is known that children who go missing are at risk of suffering significant harm, and there are specific risks around children running away and the risk of sexual exploitation.

7.7.3.2 The Hampshire Police Force, as the lead agency for investigating and finding missing children, will respond to children going missing based on on-going risk assessments in line with current guidance.

7.7.3.3 The police definition of 'missing' is: "Anyone whose whereabouts cannot be established will be considered as missing until located, and their well-being or otherwise confirmed."

7.7.3.4 Various categories of risk should be considered and Hampshire Local Safeguarding Children's Partnership provides further guidance:

Local authorities have safeguarding duties in relation to children missing from home and should work with the police to risk assess and analyse data for patterns that indicate particular concerns and risks.

7.7.3.5 The police will prioritise all incidents of missing children as medium or high risk. Where a child is recorded as being absent, the details will be recorded by the police, who will also agree review times and any on-going actions with person reporting.

7.7.3.6 A missing child incident would be prioritised as 'high risk' where:

- the risk posed is immediate and there are substantial grounds for believing that the child is in danger through their own vulnerability; or

- the child may have been the victim of a serious crime; or
- the risk posed is immediate and there are substantial grounds for believing that the public is in danger.

7.7.3.7 The high-risk category requires the immediate deployment of police resources.

7.7.3.8 Authorities need to be alert to the risk of sexual exploitation or involvement in drugs, gangs or criminal activity, trafficking and to be aware of local “hot spots”, as well as concerns about any individuals with whom children might runaway.

7.7.3.9 Child protection procedures must be initiated in collaboration with children's social care services whenever there are concerns that a child who is missing may be suffering, or likely to suffer, significant harm.

7.7.3.10 Within any case of children who are missing both push and pull factors will need to be considered.

Push factors include:

- Conflict with parents/carers
- Feeling powerless
- Being bullied/abused
- Being unhappy/not being listened to
- The Trigger Trio (domestic abuse, parental mental ill health and parental substance misuse)

Pull factors include:

- Wanting to be with family/friends
- Drugs, money and any exchangeable item
- Peer pressure
- For those who have been trafficked into the United Kingdom as unaccompanied asylum-seeking children, there will be pressure to make contact with their trafficker.

7.7.3.11 We will inform all parents of children who are absent (unless the parent has informed us). If the parent is also unaware of the location of their child, and the definition of missing is met, we will either support the parent to contact the police to inform them or do so ourselves with urgency.

7.7.4 Child Sexual Exploitation (CSE)

7.7.4.1 CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

7.7.4.2 CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

7.7.4.3 CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. (from KCSiE).

7.7.4.4 Exploitation can be isolated (one-on-one) or organised group/criminal activity.

7.7.4.5 There can be a big age gap between victim and perpetrator, but it can also be child on child.

7.7.4.6 Boys can be targeted just as easily as girls – this is not gender specific.

7.7.4.7 Perpetrators can be women and not just men.

7.7.4.8 Exploitation can be between males and females or between the same genders.

7.7.4.9 Children with learning difficulties can be particularly vulnerable to exploitation as can children from particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who go missing from home or school, children involved in crime, children with parents/carers who have mental health problems, learning difficulties/other issues, children who associate with other children involved in exploitation. However, it is important to recognise that any child can be targeted

7.7.4.10 Indicators a child may be at risk of CSE include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections or becomes pregnant;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.

7.7.4.11 CSE can happen to a child of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited and do not see themselves as a victim.

7.7.4.12 CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

7.7.4.13 TSCL educate all staff in the signs and indicators of sexual exploitation. Children who have been exploited will need additional support to help maintain them in education. We use the child exploitation risk assessment form (CERAF) and associated guidance from the Hampshire Safeguarding Children Partnership to identify students who are at risk; the DSL will share this information as appropriate with children's social care.

7.7.4.14 We recognise that we may have information or intelligence that could be used to both protect children and prevent risk. Any relevant information that we have will be shared on the community partnership information (CPI) form which can be downloaded from <https://www.safe4me.co.uk/portfolio/sharing-information/>

7.7.5 Child Criminal Exploitation (including county lines)

7.7.5.1 Child Criminal Exploitation (CCE) is defined as:- 'where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact, it can occur through the use of technology'

7.7.5.2 The exploitation of children and young people for crime is not a new phenomenon. Children under the age of criminal responsibility, or young people who have increased vulnerability due to push: pull factors who are manipulated, coerced or forced into criminal activity provide opportunity for criminals to distance themselves from crime.

7.7.5.3 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation

7.7.5.4 A current trend in criminal exploitation of children and young people is 'county lines' which refer to a 'phone line through which drug deals can be made. An order is placed on the number and typically a young person will deliver the drugs to the specified address and collect the money for the deal. These lines are owned and managed by organised crime gangs, often from larger cities, who are expanding their markets into rural areas. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation, as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

7.7.5.5 Indicators that a child may be criminally exploited include:

- Increase in **Missing episodes** – particular key as children can be missing for days and drug run in other counties

- Having unexplained amounts of money, **new high-cost items** and multiple mobile phones
- Increased social media and phone/text use, almost always secretly
- **Older males** in particular seen to be hanging around and driving
- Having injuries that are unexplained and being unwilling to have them looked at
- Increase in aggression, violence and fighting
- Carrying **weapons** – knives, baseball bats, hammers, acid
- Travel receipts that are unexplained
- **Significant missing** from education and disengaging from previous positive peer groups
- Association with other young people involved in exploitation
- Children who misuse drugs and alcohol
- Parent concerns and significant changes in behaviour that affect emotional wellbeing

7.7.5.6 TSCL will treat any child who may be criminally exploited as a victim in the first instance and using the CERAF form and guidance in our referral to children's social care. If a referral to the police is also required, as crimes have been committed on the school premises, these will also be made. Children who have been exploited will need additional support to help maintain them in education

7.7.5.7 If there is information or intelligence about child criminal exploitation, we will report this to the police via the community partnership information form. <https://www.safe4me.co.uk/portfolio/sharing-information/>

7.7.6 Serious Violence

7.7.6.1 Serious violence is becoming a factor for those who are involved in criminal exploitation. It can also be an indication of gang involvement and criminal activity.

7.7.6.2 All staff will be made aware of indicators, which may signal that students, or members of their families, are at risk from or involved with serious violent crime.

7.7.6.3 These indications can include but are not limited to increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm; significant change in wellbeing; signs of assault; unexplained injuries; unexplained gifts and/or new possessions; possession of weapons.

7.7.6.4 Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

7.7.6.5 Advice for staff can be found in in the Home Office's [Preventing youth violence and gang involvement](#).

7.7.6.6 We have a duty to not only prevent the individual from engaging in criminal activity, but also to safeguard others who may be harmed by their actions.

We will report concerns of serious violence to police and social care.

7.7.6.7 If there is information or intelligence about potential serious violence, we will report this to the police via the community partnership information form. <https://www.safe4me.co.uk/portfolio/sharing-information/>

7.7.8 Trafficked Children and modern slavery

7.7.8.1 Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

7.7.8.2 Human trafficking is defined by the UNHCR in respect of children as a process that is a combination of:

- Movement (including within the UK)
- Control, through harm / threat of harm or fraud
- For the purpose of exploitation

7.7.8.3 Any child transported for exploitative reasons is considered to be a trafficking victim. There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

7.7.8.4 There are a number of indicators which suggest that a child may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history of going missing and unexplained moves
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods
- Is known to beg for money
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
- Is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice
- Is excessively afraid of being deported.

7.7.8.4 For those children who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault)
- Prevalence of a sexually transmitted infection or unwanted pregnancy

- Reports from reliable sources suggesting the likelihood of involvement in sexual exploitation/the child has been seen in places known to be used for sexual exploitation
- Evidence of drug, alcohol or substance misuse
- Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for despite having not been at home
- Having keys to premises other than those known about
- Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity
- Truancy / disengagement with education
- Entering or leaving vehicles driven by unknown adults
- Going missing and being found in areas where the child or young person has no known links; and/or
- Possible inappropriate use of the internet and forming on-line relationships, particularly with adults.

These behaviours themselves do not indicate that a child is being trafficked but should be considered as indicators that this may be the case.

7.7.8.5 When considering modern slavery, there is a perception that this is taking place overseas. The government estimates that tens of thousands of slaves are in the UK today.

7.7.8.6 Young people being forced to work in restaurants, nail bars, car washes and harvesting fruit, vegetables or other foods may have all been slaves 'hiding in plain sight' within the U.K and rescued from slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been rescued within the UK.

7.7.8.7 If staff believe that a child is being trafficked or is a slave, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.

7.7.9 Child abduction

7.7.9.1 Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Further information is available at: www.actionagainstabduction.org

7.7.9.2 When we consider who is abducted and who abducts:

- Nearly three-quarters of children abducted abroad by a parent are aged between 0 and 6 years-old
- Roughly equal numbers are boys and girls
- Two-thirds of children are from minority ethnic groups.
- 70% of abductors are mothers. The vast majority have primary care or joint primary care for the child abducted.
- Many abductions occur during school holidays when a child is not returned following a visit to the parent's home country (so-called 'wrongful retentions')

7.7.9.3 If we become aware of an abduction, we will follow the HIPS procedure and contact the police and children's social care (if they are not already aware).

7.7.9.4 If we are made aware of a potential risk of abduction, we will seek advice and support from police and children's social care to confirm that they are aware and seek clarity on what actions we are able to take.

7.7.10 Returning home from care

7.7.10.1 When children are taken into care, consideration may be given in the future to those children being returned to the care of their parents, or one of their parents. Other children are placed in care on a voluntary basis by the parents and they are able to remove their voluntary consent.

7.7.10.2 While this is a positive experience for many children who have returned to their families, for some there are different challenges and stresses in this process.

7.7.10.3 As an organisation, if we are aware of one of our children who is looked after is returning to their home, we will consider what support we can offer and ensure as a minimum that the child has a person, that they trust, who they can talk to or share their concerns with.

7.8 Technologies

7.8.1 Technological hardware and software is developing continuously with an increase in functionality of devices that people use. The majority of children use online tools to communicate with others locally, nationally and internationally. Access to the Internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information. While technology itself is not harmful, it can be used by others to make children vulnerable and to abuse them.

7.8.2 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or

- young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
 - commerce - risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

7.8.1 Online Safety and Social Media

7.8.1.1 Staff must behave in accordance with the Staff Code of Conduct and Safer Working Practices Guidance.

7.8.1.2 All computer equipment and internet access within the children’s homes is subject to ‘parental controls’ and internet safety rules in line with our E-safety Policy, Anti-bullying Policy and Safer Working Practices Guidance. Staff need to help all those in our care to prepare for the hazards whilst promoting the many learning and social opportunities available through the internet and social media. This can be achieved via bespoke placement plans, up to date risk assessments, and personalised internet/ WIFI contracts.

7.8.1.3 If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they should neither mention TSCL, any of the location names, or make reference to their employment at TSCL. Staff are advised not to communicate with young people, parents, and person with PR, guardians, or young people in TSCL’s care via social networking sites.

7.8.1.4 Staff in the children’s homes, and parents/ person(s) with PR are reminded that law prohibits publication of material that may lead to the identification of a staff member who is the subject of an allegation. Publication includes verbal conversations or writing, including content placed on social media sites.

7.8.1.5 In accordance with the Children’s Homes Regulations (2015), all young people have, or are working towards having, private access to a telephone to make and receive calls/ texts, to electronic mail to send and receive emails, and facilities to send and receive post. The core safeguarding team’s contact details will also be on the Young Person’s Safeguarding Poster; thus it is possible staff will be alerted to concerns via social media e.g. in a text message, email, letter, voice message etc. All staff should follow the procedure in section 6.3 ‘Flowchart procedure’ and, if confirmed to be of concern, copy the contents of the concern onto the Safeguarding Form (this can be done as a screenshot if possible). The original evidence should be preserved until the safeguarding has ‘closed’ on the Central Database of Concerns.

7.8.2 Cyberbullying

7.8.2.1 Central to the school’s anti-bullying policy is the principle that *‘bullying is always unacceptable’* and that *‘all students have a right not to be bullied’*.

7.8.2.2 TSCL also recognises that it must take note of bullying perpetrated outside of the schools children in our care attend, which has an impact within the school; therefore, once aware we will respond to any cyber-bullying carried out by students when they are away from the site.

7.8.2.3 Cyber-bullying is defined as 'an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself.'

7.8.2.4 By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile 'phones
- The use of mobile 'phone cameras to cause distress, fear or humiliation
- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
- Using e-mail to message others
- Hijacking/cloning e-mail accounts
- Making threatening, abusive, defamatory or humiliating remarks in on-line forums

7.8.2.5 Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including internet sites.

7.8.2.6 Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.

7.8.2.7 The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

7.8.2.8 If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. TSCL will pass on information to the relevant school and/or the police if it feels that it is appropriate or is required to do so.

7.8.3 Sexting

7.8.3.1 'Sexting' often refers to the sharing of naked or 'nude' pictures or video through mobile phones and/or the internet. It also includes underwear shots, sexual poses and explicit text messaging is it sometimes referred to as youth produced sexual imagery.

7.8.3.2 While sexting often takes place in a consensual relationship between two young people, the use of sexted images in revenge following a relationship breakdown is becoming more commonplace. Sexting can also be used as a form of sexual exploitation and take place between strangers.

7.8.3.3 As the average age of first smartphone or camera enabled tablet usage for a child is 6 years old, sexting is an issue that requires awareness raising across all ages.

7.8.3.4 TSCL will use age appropriate educational material to raise awareness, to promote safety and deal with pressure.

7.8.4 On-line sexual abuse

7.8.4.1 As a company we will:

- **Report** to the police, CEOP or any other relevant body any on-line sexual abuse or harmful content we are made aware of. This could include sending abusive, harassing and misogynistic messages; sharing nude and semi-nude images and videos; and coercing others to make and share sexual imagery. We will seek guidance from the NPCC '[when to call the police](#)' document and the internet watch foundations '[report harmful content](#)' website
- **Educate** to raise awareness of what on-line sexual abuse is, how it can happen, how to limit the impact and what to do if you become aware of it.
- **Support** victims of on-line abuse within the school community

7.8.5 Gaming

7.8.5.1 Online gaming is an activity in which the majority of children and many adults get involved. TSCL will raise awareness:

- By talking to parents and carers about the games their children play and help them identify whether they are appropriate
- By supporting parents in identifying the most effective way to safeguard their children by using parental controls and child safety mode
- By talking to parents about setting boundaries and time limits when games are played
- By highlighting relevant resources.

7.8.6 Online reputation

7.8.6.1 Online reputation is the opinion others get of a person when they encounter them on-line. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that children and staff are aware that anything that is posted could influence their future professional reputation. The majority of organisations and work establishments now check digital footprint before considering applications for positions or places on courses.

7.8.7 Grooming

7.8.7.1 On-line grooming is the process by which one person with an inappropriate sexual interest in children will approach a child on-line, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm.

7.8.7.2 TSCL will build awareness amongst children, so that they can:

- Only has friends on-line that they know in real life

- Is aware that if they communicate with somebody that they have met on-line, that relationship should stay on-line.

7.8.7.3 TSCL will support staff and children to:

- Recognise the signs of grooming
- Have regular conversations with their children about on-line activity and how to stay safe on-line

7.8.7.4 Additionally to being targeted for sexual motivations, some young people are also groomed online for exploitation or radicalisation. While the drivers and objectives are different, the actual process is broadly similar to radicalisation, with the exploitation of a person's vulnerability usually being the critical factor. Those who are targeted are often offered something ideological, such as an eternal spiritual reward, or sometimes something physical, such as an economic incentive, that will make them 'feel better' about themselves or their situation.

7.8.7.5 Anyone can be at risk. Age, social standing and education do not necessarily matter as much as we previously thought, and we have seen all kinds of people become radicalised, from young men and women with learning difficulties to adults in well-respected professions. What is clear is that the more vulnerable the person, the easier it is to influence their way of thinking.

7.8.7.6 Signs of grooming can include:

- isolating themselves from family and friends;
- becoming secretive and not wanting to talk or discuss their views;
- closing computers down when others are around;
- refusing to say who they are talking to; using technology such as anonymous browsing to hide their activity; and
- sudden changes in mood, such as becoming angry or disrespectful.

Of course, none of these behaviours necessarily mean someone is being radicalised and, when displayed, could be a symptom of bullying or other emotional issues.

7.9 Death of someone in TSCL's care

7.9.1 In the event of the death of a young person in one of our children's homes emergency services should be called immediately and emergency first aid attempted as directed by the emergency services. The RI and DSL/DDSP should be notified immediately. The DSL or RI must notify the following within 24 hours:

- HMCI;
- The placing authority;

- The Secretary of State (if the Secretary of State is not the placing authority);
- The local authority in whose area the children's home is located (if that local authority is
- The placing authority);
- The clinical commissioning group (as defined in section 14D of the National Health Service Act 2006) for the area in which the home is located;

7.9.2 The assistance of the local police and social services department should be sought in order to follow the Hampshire Safeguarding Children Partnership 'child death review procedures' and to inform the young person's parents/carers. See Working Together 2018 for further guidance.

7.11 Visitors

7.11.1 All authorised visitors will be required to sign in and out at all times. All unauthorised visitors will be challenged by staff and reported to the Registered Manager or most appropriate senior member of staff before entry is authorised.

7.11.2 Staff will ensure that all visitors are escorted around TSCL's locations at all times unless previously assessed and agreed, to ensure all young people remain safe and the visitor's wellbeing can be maintained (e.g. in the event of a young person making an allegation against a visitor).

7.12 Missing young people

7.12.1 The Association of Chief Police Officers has provided the following definitions and guidance:- *"Missing person is: 'Anyone whose whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of crime or at risk of harm to themselves or another.'*

An absent person is: 'A person not at a place where they are expected or required to be.'

All cases classified as 'missing' by the police will receive an active police response – such as deployment of police officers to locate a child. Cases where the child was classified as 'absent' will be recorded by the police and risk assessed regularly but no active response will be deployed.

The absent case will be resolved when a young person returns or new information comes to light suggesting that he/she is at risk. In the latter instance, the case is upgraded to 'missing'.

7.12.2 Every precaution is taken through the use of risk assessments and thorough planning and supervision to ensure that young people are safe in their home, and on outings. If a young person goes missing from our location it is considered a potential indicator of abuse or neglect.

7.12.3 Our staff members should follow our Missing Young Person Policy and procedures in the event of a young person going missing. Accordingly they are expected to try to identify any risk of abuse and neglect, including sexual abuse or exploitation. In addition, all children's homes must inform the Local Authority of any young person who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 days or more or as such intervals agreed with the Local Authority. It is essential that all staff are alert to signs such as travelling to conflict zones, county lines, FGM, forced marriage, radicalisation and exploitation.

7.13 Young people's bedrooms

7.13.1 It is acknowledged that a young person's bedroom is their own personal space and as such it is unlikely that a member of staff will need to enter a young person's bedroom. However, there are, on occasions, appropriate times for staff to attend to a young person in their room.

7.13.2 If there is a necessity to attend to a young person in their room this should be done alongside another member of staff who is present and in sight of the bedroom i.e. on the landing with the bedroom door open. Example of times when a staff member may be required to enter a young person's bedroom include (but not limited to) support to clean their bedroom, when the child is ill or requires medical attention, support with an aspect of personal care (which has been identified in a care plan). At these times it does not involve searching of the young person's possessions.

7.13.3 Very occasionally there may be an identified reason or need to undertake a room search of a young person's bedroom. The decision to complete a room search is made after careful consideration and would be done in order to safeguarding the welfare of the young person or others, for example:

- If a young person were missing from care, the staff would be expected to search the rooms to ensure the young person was not hiding within the home. Depending upon the circumstances it may be necessary to look for names and addresses of friends the young person was likely to visit to assist the police to locate the young person as quickly as possible.
- If there are reasonable grounds to search for any illicit substance.
- If there is a suspicion of any form of weapons.
- If there is a suspicion that there may be a risk of fire, e.g. matches, lighters, petrol being stored. • Any reason identified in a child's individual Care Plan or Risk Assessment where it has been identified and agreed that the room or possessions are to be searched e.g. a child who self-harms and the room could be searched for harmful materials.

7.13.4 If a room search is indicated, with clear documentation noting the reasons, the young person will be informed, will consent and be present, if this is deemed appropriate.

7.13.5 There may be occasions when a room search is completed without the young person's prior knowledge, either due to the urgency of the search or the risks of informing the

young person. This would be agreed by the most senior person on duty on a case by case basis. There will always be two members of staff involved in the search, one being a witness to ensure the search is being performed with respect to the child's belongings. Full and contemporaneous records will be made using the appropriate 'Searches Recording Sheet'. All staff present for the search must sign the sheet and the manager countersign the record.

7.13.6 If there are very serious grounds - which pose an imminent risk - to search, and a young person prevents this, the young person should be informed that the police will be contacted and the reasons given. This is not to be used as a form of threat to the young person and needs to be explained in a sensitive manner.

7.13.7 All staff working in the home are prohibited from undertaking any form of body search.

7.13.8 Staff can request a child empties their pockets if there is a suspicion that the child is carrying an item which would put the child or others welfare at risk. If the child refuses to hand the staff an item in their possession; that would put the child or others at serious risk, consideration should be given to contact the police.

7.14 First aid/health and medication

7.14.1 Except in cases of emergency first aid will only be administered by qualified First Aiders. If it is necessary for the young person to remove clothing for first aid treatment there will always be another staff member present. All first aid will be recorded and, where significant, will be shared with the appropriate people (parents/ person(s) with PR). All young people will have delegated consent from those who hold parental responsibility for the administration of medication. Refer to Safer Working Practices Guidance and Medication Policy.

7.15 Radicalisation (Prevent)

7.15.1 The prevent duty requires that all staff are aware of the signs that a young person maybe vulnerable to radicalisation. The risks will need to be considered for political; environmental; animal rights; or faith-based extremism that may lead to a young person becoming radicalised.

7.15.2 Having undertaken approved training, all staff can identify the signs of children being radicalised. As part of the preventative process resilience to radicalisation will be built through the promotion of fundamental British values.

7.15.3 In accordance with our E-safety Policy TSCL staff need to be vigilant in ensuring the safety from extremist and terrorist material when accessing the internet. TSCL take into account HSCB arrangements to fulfil its Prevent duties.

7.15.4 Any child who is considered vulnerable to radicalisation will be referred to Hampshire children's social care, where the concerns will be considered in the MASH process. If the police prevent officer considers the information to be indicating a level of risk a

“channel panel” will be convened and we may be asked to attend and support this process. See Hampshire Prevent Partnership Boards contact details in section 12.5 [‘Hampshire Prevent Partnership Board contact details’](#).

7.16 Abuse of position of trust

7.16.1 All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition, staff should understand that, under the Sexual Offences Act (2003), it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, or where that person is in a position of trust, even if the relationship is consensual. Any sexual activity between a member of staff and a young person in our care is therefore a criminal offence, even if that young person is over the age of consent. The police will be notified in these instances and LADO processes followed.

7.17 Contractors

7.17.1 TSCL will check the identity of all contractors working on site and request the full range of DBS and other required checks where they work in regulated activity or unsupervised in accordance with the latest government guidance. If these checks have not been completed contractors will be escorted at all times in the presence of TSCL young people.

7.18 Extended off-site arrangements

7.18.1 Where extended off-site activities are provided by and managed by TSCL, this safeguarding policy and procedures apply. If other organisations provide services or activities on our site the TSCL will check that they have appropriate procedures in place, including safer recruitment procedures and clarify whose procedure is to be followed if there are concerns. There will be clear communication channels to ensure the DSL is kept appropriately informed.

7.18.2 When our young people are doing off-site activities, including day and residential visits and work related activities, the DSL will be kept appropriately informed; risk assessing and checking that effective safeguarding arrangements are in place.

7.19 Photography and images

7.19.1 The vast majority of people who take or view photographs or videos of young people do so for entirely innocent and acceptable reasons. This helps provide a visual reminder of the young person’s time with TSCL and is part of their life story.

7.19.2 Sadly, some people abuse young people through taking or using images, so TSCL must ensure that safeguards are in place.

7.19.3 To protect our young people, TSCL will:

- Seek their consent for photographs to be taken or published (for example, on TSCCL website or in newspapers or publications)
- Seek consent from the person(s) with parental responsibility – where appropriate
- Not use their full name with an image
- Ensure that personal data is not shared
- Store images appropriately, securely and for no longer than necessary Only use TSCCL equipment, i.e. not personal devices.
- Encourage our young people to tell staff if they are worried about any photographs that are taken of them.

7.20 Positive holding and use of reasonable force

7.20.1 All staff are encouraged to use de-escalation techniques and creative alternative strategies that are specific to the young person in line with our positive holding training (Team Teach). A positive hold will only be used as a last resort and all incidents of this are reviewed, recorded and monitored. Reasonable force will be used in accordance with government guidance. Refer to Promoting Positive Behaviour Policy for further information.

7.21 Staff taking medication or other substances

7.21.1 Staff members must not be under the influence of alcohol or any other substance which may affect their ability to care for our young people. If they are taking medication they should seek medical advice and inform a member of the core safeguarding team who will review their medical advice and take a decision as to whether they are fit for work. TSCCL only allow staff to work if medical advice confirms that their ability to look after young people is unlikely to be impaired. Should a member of staff need to bring their medication to any children's home it must be securely stored and out of reach of all young people. Refer to Drug and Alcohol Policy.

7.22 Teaching and learning

7.22.1 Our young people are given opportunities through teaching and learning how to develop their knowledge and understanding of safeguarding and how to keep themselves safe; this can be formally through the curriculum and through informal opportunities within the children's homes.

7.23 Information for young people and relatives / person(s) with PR

7.23.1 Young people, relatives and person(s) with PR will be given information regarding safeguarding at TSCCL. The format of the information given will take into account the age of the young person, and level of understanding. These will explain clearly what abuse is and also how to express a concern or make a complaint. All young people in TSCCL's care will receive a Young Person's Safeguarding Poster, and all visitors to each location will be able to request a copy of this Safeguarding Policy which includes contact details of the DSL, the DDSP and SLs.

7.23.2 All those in our care, and relatives / person(s) with PR, will be informed that their concerns or complaints will be taken seriously, be dealt with independently and that they will be kept involved in the process to the degree that they wish to be. They will be reassured that they will receive help and support in taking action. They will also be advised that they can nominate an advocate or representative to speak and act on their behalf if they wish.

7.23.3 For young people assessed as lacking capacity to make decisions about how they could be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be appointed. They will be advised of rights to legal aid and where appropriate to victim support and compensation.

Regardless of the type of concern or behaviour we must ensure all relevant parties are informed and partnered with .

- Police
- Missing persons coordinator /exploited team
- Prevent
- CE team
- MASH
- Ofsted

8 Accountability

8.1 Responsibilities

8.1.1 Senior Leadership Team members Sean Maguinness and Jarod Elcock at TSCL have lead responsibility for protecting and safeguarding young people and liaising with the local authority and other local agencies as appropriate (the DDSP in the DSL's absence). This includes young person protections, referrals, raising awareness, training, allocating resources and supporting/directing staff within the locations. In all matters relating to young person protection and safeguarding TSCL will follow the procedures outlined in this policy. See responsibilities in section 3.1 ['Designated Safeguarding Lead \(DSL\)'](#).

8.1.2 Safeguarding leads (SL) - are responsible for ensuring that staff are aware of this policy and offer support to those reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can be stressful and distressing for staff.

8.1.3 All staff - are responsible for identifying signs of, and responding to allegations of abuse. Staff at operational level need to share a common view of what types of behaviour may be abuse or neglect and what should be an initial response to suspicion or allegation of abuse or neglect. See definitions in section 2.5 ['Definitions of abuse'](#).

8.2 Duty of candour

8.2.1 The statutory duty of candour places a requirement on us as providers to be open with the young people in our care and their families / social care team when there are failings or things go wrong. As a provider we have established a duty throughout our organisations, ensuring that honesty and transparency are the norm in every location registered by Ofsted.

8.3 Recruitment and vetting

8.3.1 TSCL Safer Recruitment, Induction and Probation Policy reflects Safer Recruitment guidelines and legislation in section 10 '[Appendix 1: Statutory Legislation](#)'.

8.3.2 TSCL has a Single Central Record. This has restricted access to the Managing Director and HR. It covers all staff including agency care staff and bank members of staff and is regularly audited.

8.3.3 When TSCL use agency staff we ensure we obtain written confirmation that all checks have been completed, in line with safer recruitment, from the employment business that is supplying the member of agency staff. The HR department must ensure that a contract exists between the location and the agency to confirm that, in the event of there being a disclosure on a DBS certificate, the location will have sight of the certificate before that person can begin work at the children's home. TSCL locations must check the identity of any person deemed 'agency' staff separately to the agency.

8.4 Disqualification under the Childcare Act

8.4.1 The Childcare Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare.

8.4.2 We will check for disqualification under the Childcare Act as part of our safer recruitment processes for any offences committed by staff members or volunteers.

8.5 Requirements to inform Disclosure and Barring Services (DBS)

8.5.1 TSCL will report promptly to the DBS (but no longer than one month after leaving the location), any person (whether employed, contracted, or student) whose services are no longer required because he/she is considered unsuitable to work with young people. This includes making a referral where an employee has been dismissed (or would have been dismissed) had he/she not resigned beforehand.

8.6 Record-keeping

8.6.1 Record keeping is an important element of safeguarding. Whenever someone has a suspicion of, or makes an allegation of abuse, the staff member responding to the concern must keep clear and accurate records using an incident/safe guarding form.

8.6.2 Each location will keep a Safeguarding Log for all concerns raised. They will also

maintain a location specific Central Database of Concerns which is more detailed and can be filtered to a particular young person to aid monitoring / review of safeguarding effectiveness.

- 8.6.3 Records should be, factual, accurate, concise, ethical and relevant. The voice of the child should be evident.
- 8.6.4 All recording of written information should be legible and discussions with other professionals and agencies should be recorded chronologically.
- 8.6.5 Each young person will have their own folder containing all concerns / safeguarding documentation relating to them on TSCL's server (SharePoint). The folders are again kept in a secure location on the TSCL's server with restricted access to the safeguarding team.

8.7 Monitoring

- 8.7.1 A quality assurance cycle operates to ensure that safeguarding concerns and notifications are recorded, managed and responded to in each location. The cycle is informed by a regular Senior Safeguarding Overview meeting and the identification and management of safeguarding risks. The DSL will undertake a review of safeguarding arrangements in line with scheduled changes to this policy outlined in section 1 [‘Monitoring and Review’](#).

8.8 Training and supervision

- 8.8.1 All staff will receive information regarding safeguarding on induction. The induction introduces the new staff member to policy, procedure and practice at TSCL. They will also be orientated to where to find information regarding safeguarding including relevant posters around the location. As part of their induction all staff are required to read this policy and confirm that they understand their role in safeguarding and protecting young people within our children's homes.
- 8.8.2 All staff will complete mandatory training regarding safeguarding via the company's eLearning provider. This module is completed every three years to maintain staff awareness of their responsibilities in relation to young person's safeguarding at all times. The DSL will ensure all staff receive annual face to face safeguarding workshops. This can be undertaken in such forums as staff meetings, learning groups or formal training sessions as required.
- 8.8.3 The children's homes must check that agency staff have completed basic awareness training before being allowed into contact with young people. Contractors and others on site who might have unsupervised access to young people must also complete basic awareness training before being allowed to start work.
- 8.8.4 All members of the safeguarding team, and the deputy safeguarding leads, will attend safeguarding supervision / reflections that is on offer within the homes. In addition the safeguarding leads can arrange ad hoc supervision with the DSL or DDSP.

- 8.8.5 DSLs and DDSPs attend safeguarding training every two years with their own local authority. Where a local authority does not provide this training they will attend training in line with the local authority guidance. They have a duty to maintain up to date with their safeguarding knowledge.
- 8.8.6 All staff members will have their safeguarding knowledge and experience reviewed in monthly supervision with their line manager.
- 8.8.7 TSCL also provide role-appropriate and refresher training to all staff including those specific to the role of DSL and DDSPs via the company's eLearning provider. This includes:
- Fire Safety Awareness
 - Data Protection
 - Health and Safety
 - Team Teach
 - First Aid
 - Food Safety
 - COSHH
 - Medication
 - CSE Awareness
 - Internet Safety
 - FGM
 - Display Screen Equipment
 - Prepare for Prevent

 - Safeguarding

 - Challenging Behaviour
 - Equality and Diversity

 - Safer Recruitment

 - GDPR
 - SPACE

 - Transactional Analysis

 - Finance

 - Self-Harm

 - Supervision and Appraisal

 - Fire Marshall

 - Anti-Bullying

 - Drug and Alcohol Misuse

 - Domestic Violence Awareness

 - Ligature

 - Autistic Spectrum Disorder

 - Child Mental Health

 - Attachment in the Early Years

- DOLs
- Maslow's Hierarchy and Parenting Routines
- Prevent

8.8.8 The DSL is responsible for promoting awareness of:

- Mental Health
- Private Fostering
- Prevention of Radicalisation
- Sexting
- CSE (including online)
- Teenage Relationship Abuse
- Trafficking
- Drugs
- Fabricated and Induced Illness
- Faith Abuse
- Gangs
- Missing young people
- Bullying
- Domestic Violence
- FGM
- Forced Marriage
- Gender Based Violence – Including Breast Ironing

8.9 Confidentiality and information sharing

8.9.1 Information relating to young people safeguarding cases is confidential, although some information can be shared with relevant staff, this should be done only on a 'need to know' basis.

8.9.2 In certain circumstances it will be necessary to exchange or disclose personal information with other agencies. This must be done in accordance with relevant TSCL policies e.g. Information Governance Policy and all relevant legislation including the General Data Protection Regulation 2018/98.

8.9.3 When sharing safeguarding information regarding a young person, staff will consider the following:

- Information should only be shared on a 'need to know' basis when it is in the best interests of the young person;
- Informed consent should be obtained but, if this is not possible and other young people are at risk of abuse or neglect, it may be necessary to override the requirement;
- Distinguish fact from opinion.
- Ensure you are giving the right information about the right person.
- Ensure you are sharing information securely
- Whether to inform the person that the information has been shared if they were not already aware of this and if it would not create or increase risk of harm to them/others.

- 8.9.4 Sharing information externally can be unsafe without a secure email address. To mitigate risks associated with sharing sensitive information about young people via email, information sharing will be covered within company safeguarding training. Staff should use minimal personally identifiable information, with a nonspecific subject heading so that the young person cannot be easily identified (e.g. 1/2 initials, not full names). Facts that do not expose the identity of the young person can be explained. The SL should limit the information they share, and request the professional contacts them via the telephone / meets with them face to face to discuss the matter in more depth should they require more information. If a document needs to be sent electronically, this should be done so password protected with the password sent in a *separate* email.
- 8.9.5 The following wording will be included in all staff member's electronic signature when sending emails:
"The contents and any attachments of this electronic mail message are confidential and intended only for the named addressee(s). Personal data, or information which identifies a living person from the data, will not be disclosed unless provided for within the confines of the data protection laws. If you have received this message in error please delete it and notify the sender immediately. You should not retain the message or disclose its contents to anyone. If you require assistance please contact the sender. Unless stated to the contrary, any opinions expressed in this message are personal and may not be attributed to The Serendipity Centre or Serendipity Educational Services Ltd. The recipient(s) are reminded that the internet and e-mails are not necessarily secure. The Serendipity Centre or Serendipity Educational Services Ltd do not accept responsibility for changes made to this message after it was sent".
- 8.9.6 Failure to follow this policy and location procedure may result in disciplinary action.
- 8.9.7 The priority, at all stages throughout this process, is the interests and safety of the young people. The DSL will arrange to for concerns about their welfare to be discussed with them / parents / person(s) with PR as appropriate and where relevant seek their agreement to making a referral to either CSC/ASC or the LADO. However, where there is a conflict of interests between the young person and parent/guardian, the interests of the young person must take priority and TSCL reserves the right to contact the young person's local authority, placing authority, or the police without notifying parents/person(s) with PR if this is in their best interests.
- 8.9.8 We will provide an advocate to each young person where appropriate, if they are unable to speak for themselves without support, or an Independent Mental Capacity Advocate (IMCA) if subject to the Mental Capacity Act (2005). As the Care Act (2014) promotes, 'no decision about me without me'.

8.10 Complaints

8.10.1 All complaints arising from the operation of this policy will be considered under the Complaints Policy, with reference to the DSL and HSCB.

9 Standard Forms and Relevant Documents

9.1 Applicable policies

Public Interest Disclosure (Whistle Blowing) Policy
Staff Code of Conduct
CCTV Policy
Management of Young Person Allegations Policy
Staff Performance and Development Policy
Missing Young Person Policy
Safer Working Practices Guidance
Medication Administration Policy
E-Safety Policy
Promoting Positive Behaviour Policy
Drug and Alcohol Policy
Safer recruitment, Induction and Probation Policy
GDPR Young Person Policy
Complaints Policy
Anti-bullying Policy
Social Media Policy

9.2 Applicable documents

Safeguarding Referencing Guidance
Debrief Form
Body Map
Young Person's Worry Form

9.3 Further guidance / information

9.3.1 Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information on its website www.nspcc.org.uk/preventing-abuse/. Our children's homes can also access broad government guidance on the issues listed here via the GOV.UK website: young person sexual exploitation (CSE); bullying including cyber bullying; domestic violence; drugs; fabricated or induced illness; faith abuse; female genital mutilation (FGM); forced marriage; gangs and youth violence; gender-based violence/violence against women and girls (VAWG); mental health; private fostering; radicalisation; sexting; teenage relationship abuse; trafficking, CE, county lines.

10 Appendix 1: Statutory Legislation

10.1.1 This policy complies with, and or makes reference to, the following:

- NICE, 2018. Recognising child abuse and neglect. Available at: <https://www.nice.org.uk/guidance/ng76/chapter/Recommendations#recognisingchildabuse-and-neglect>.
- Safeguarding Children in whom illness is fabricated or induced, 2008. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/277314/Safeguarding_Children_in_whom_illness_is_fabricated_or_induced.pdf
- Statutory Instrument 2015 No.541 Social Care, England The Young people's/care home Homes (England) Regulations 2015 in force as of 1st April 2015.
- Guide to the Young people's/care home Homes Regulations including the Quality Standards (DfE: April 2015)
- Working Together to Safeguard Young people (WT) A guide to inter-agency working to safeguard and promote the welfare of young people 2023. This policy is also in accordance with the Hampshire's Safeguarding Children Partnership (HSCP) locally agreed inter-agency safeguarding processes and procedures
- Keeping Young people Safe in Education (KCSIE) Information for all school and colleges (DfE: September 2019) Disqualification under the Young person care Act 2006 (February 2015) and also refers to non-statutory advice for practitioners, What to do if you're worried a young person is being abused (HM Government: March 2015)
- Prevent Duty Guidance: for England and Wales (December 2023) (Prevent). Prevent is supplemented by The Prevent duty: Departmental advice for schools and young person minders (June 2015) and The use of social media for on-line radicalisation (July 2015)
 - The Health and Social Care Act 2012 (Regulated Activities) Regulations 2015
- Care Act 2014
- Female Genital Mutilation Act 2003, (as inserted by section 74 of the Serious Crime Act 2015)
- Terrorism Act 2000
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- General Data Protection Regulation 2018/98
- Counter Terrorism and Security Act 2015
- Safeguarding Children in Education 2023.
- All Wales POVA Guidance 2008.
- Keep learners Safe 2015.

11 Appendix 2: LADO terminology confirmation

Monday 4th November 2019 at 12:57.

The phrase LADO was initially coined from Working Together 2006 and was in place until 2015. During this period there was a long slow process of awareness raising undertaken nationally as to what the local authority designated officer did.

The current version of WT changed the 2015 phrase and now requires County level and unitary local authorities to have “*designated a particular officer, or team of officers*” in the management and oversight of allegations.

My understanding is that this came about in response to the growing number of CSDs that are run by companies. In these situations the designated officer is not paid for directly by the authority and so semantics make this the designated officer for the local authority rather than the local authorities designated officer.

If Ofsted were to get picky, then we should in Hampshire be DTO and Southampton would be DPO until the next version of WT is published and the phrase changes again.

As Hampshire still runs its own CSD and we are the designated officers, given the national understanding of the acronym we have made a choice that in Hampshire we will still be known as LADOs.

12 Appendix 3: Key Contacts

12.1 Core safeguarding team contact details

12.1.1 Sean Maguinness
Jarrod Elcock
Davina Pillay
Ken Rowe
Matt Langran
Philippa Smith

12.1.4 Safeguarding team email address: caresafeguarding@serendipity-education.com

12.2 Hampshire contact details

12.2.1 Hampshire Local Authority – Children’s Social Care MASH

Telephone **0300 555 1384** / **0845 6035620** childrens.services@hants.gov.uk

Office hours: Monday to Thursday 9:00am-5:15pm, Friday 9:00am-4.30pm

12.2.2 Hampshire police 0845 0454545

The non-emergency police telephone number is: 111.

In an emergency dial 999.

12.3 LADO contact details

12.3.1 The Local Authority Designated Officer’s (LADO) Telephone Office hours: 01962 876364

12.3.2 Outside of office hours/weekends, the emergency duty team can be contacted on: 0845 6004555

12.4 Ofsted contact details

12.4.1 General enquiries

Email enquiries@ofsted.gov.uk Tel: 0300 123 1231

Our helpline is open from 8am to 6pm (Monday to Friday).

12.4.2 Contact Ofsted about concerns

Email CIE@ofsted.gov.uk Tel: 0300 123 4666

<https://www.gov.uk/government/organisations/ofsted>

12.5 Hampshire Prevent Partnership Board contact details

12.5.1 Children: 0300 555 1384 Adults: 0300 555 1386

12.5.2 Information and advice is also available from:

Anti-Terrorist Hotline: **0800789321**

Crime Stoppers: **0800 555 111**

12.5.3 Remember, if you suspect terrorism or violent extremism is being promoted or related activity is taking place contact the police on **101** or in an emergency call **999**.