

**Safeguarding Children Policy**

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**1.** **Introduction**

1.1 This policy lays out Pathways to Independence UK’s (PTIUK) commitment to ensuring safeguarding practice complies with statutory responsibilities and the principles as set out in our safeguarding policy statement.

1.2 This policy sets out the responsibilities of staff in relation to promoting a safeguarding best practice culture, the safeguarding of children and maintaining a safe environment.

1.3 We define children as anyone under the age of 18, in line with the UK law and the UN Convention on the Rights of the Child.

1.4 This policy has been drawn up on the basis of legislation, policy and good practice guidance that seeks to protect children in England such as The Children Act 1989, Working Together to Safeguard Children 2018 (updated December 2020) and guidance as set out by local Safeguarding Children Partnerships for instance.

1.5 We will endeavour to take a trauma informed approach to all safeguarding issues to prevent further re-traumatising or direct negative impact on mental health. This is important because some children and young people are additionally vulnerable because of the impact of adverse childhood experiences, displacement, communication needs, level of dependency or other circumstances for example.

1.6 PTIUK’s approach to safeguarding is based upon the key principles of:

* Safeguarding is everyone’s responsibility: each professional and organisation should play their full part; and
* A person-centred approach: empowering children, young people and their families and communities to build on strengths and resilience to overcome adversities

1.7 Our procedure for managing safeguarding is based on seven R’s - Recognise, Respond, Report, Record, Refer, Risk Manage and Reassure

**2.** **Definitions**

2.1 **Safeguarding children is defined** in Working Together to Safeguard Children 2018 as:

* protecting children from maltreatment
* preventing impairment of children’s health or development
* ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
* taking action to enable all children to have the best outcomes

2.2 **Child Protection** is part of safeguarding and refers to the specific activity that is undertaken under The Children Act 1989 to protect children who are suffering, or are at risk of suffering, significant harm.

2.3 **Harm** means the ill treatment or the impairment of health or development of a child including impairment suffered from seeing or hearing the ill treatment of another.

2.4 Harm is considered **significant harm** by comparing a child’s health and development with what might be reasonably expected of a similar child and which interrupts, changes, or damages physical and psychological development. Determining significant harm is ordinarily the role of Local Authorities in accordance with the law and practice.

2.5 **Contextual safeguarding** – It is an approach to understanding and responding to young people’s experience of harm beyond their families or household for instance. It recognises the relationships young people have online, in college or in their communities that can feature abuse and possibly violence. It recognises that there are contexts where parents, carers and support workers may have little influence over, which can lead to harm.

2.6 **Staff** - any reference to staff throughout this policy refers to paid staff, contractors, volunteers and students.

2.7 **Young person** – we typically support care experienced young people, over the age of sixteen years old, and refer to children of this age as young people.

**3.0** **Safeguarding Children Partnerships and the Local Authority Landscape**

3.1 We typically house young people who are supported by various Local Authorities as Looked After Children under Section 20 of The Children Act 1989 or under Children (Leaving Care) Act 2000 as formerly relevant Looked After Children.

3.2 We must abide by Local Safeguarding Children’s Partnership procedures in specific geographical locations as well as placing Local Authority procedures.

3.3 Each Local Authority has a Safeguarding Children’s Partnership website and their procedures are available online, such as:

* London Safeguarding Children Board - <https://www.londonscb.gov.uk/london-scb-contacts/>
* Brighton and Hove Safeguarding Children Partnership - <https://www.bhscp.org.uk/>
* Surrey Safeguarding Children Partnership - <https://www.surreyscp.org.uk/>
* Portsmouth Safeguarding Children Partnership - <https://www.portsmouthscp.org.uk/>
* Pan-Sussex Safeguarding Procedures Hub - <https://sussexchildprotection.procedures.org.uk/>

3.4 Other safeguarding information can be found online such as the NSPCC - <https://www.nspcc.org.uk>

**4.** **Designated staff**

4.1 The Deputy Safeguarding Lead: is the Team Leader (North) who reports safeguarding to and deputises for the Designated Safeguarding Lead.

4.2 The Designated Safeguarding Lead: is the Team Leader (South) and leads on compliance with operational responsibilities for safeguarding within the Leadership Team.

4.3 The Registered Service Manager: leads on compliance with governance and accountability responsibilities for safeguarding within the Leadership Team, including notification responsibilities in the case of a serious event.

**5.** **Safeguarding responsibilities**

5.1 It is the responsibility of all staff to:

* Value, listen and respect children and young people
* Be prevention focused
* Always take safeguarding matters seriously and escalate according to procedure
* Follow the organisations safeguarding policies and procedures
* Follow our code of conduct and professional boundaries
* Attend safeguarding training, meetings and supervision as arranged
* Promote the safety and welfare of anyone that interacts with our service
* Report any safeguarding issues to the appropriate designated safeguarding lead and relevant local authority as needed – **see flow chart below (section 8)**

5.2 It is the responsibility of the Project Worker to:

* Build trust and rapport with those we support adhering to professional boundaries
* Reinforce positive messages about those who seek help
* Be clear about the parameters of confidentiality and when we will share information
* Report all safeguarding matters to the appropriate designated lead
* Work in partnership with children, young people, their parents, carers, social services and other agencies to promote safety and wellbeing
* Have a positive regard for young people, their capacity for change and their resilience
* Provide keywork on keeping safe as lack of awareness is a barrier to seeking help
* See the whole person – engage with young people in terms of their strengths and areas for development - see Support Policy
* Help young people to help each other – equip them with the skills and tools to support their peers, family and community
* Consider the role of technology and provide guidance on online safety

5.3 It is the responsibly of the Deputy Safeguarding Lead to:

* Deputise for the nominated Designated Safeguarding Lead in absence
* Be first point of call for all young person related safeguarding issues in the North Project
* To take lead on making referrals to statutory and other agencies as appropriate
* Lead on casework management to promote the safety and welfare of those engaged in our services
* Make sure staff delivering support know what to do if they are concerned about a child or young person
* Lead de-briefs and staff learning sessions as necessary
* Lead on any safeguarding issues that may arise On Call including reporting matters in line with procedure
* Report regularly to the Designated Safeguarding Lead on issues relating to safeguarding
* Update the safeguarding log

5.4 It is the responsibility of the Business Manager to:

* Lead on any safeguarding issues that may arise On Call, including reporting matters in line with procedure
* Lead on Health and Safety compliance in line with legislation, risk assessment process and guidance
* Lead on ensuring safe Wifi settings, as appropriate

5.5 It is the responsibility of the Designated Safeguarding Lead to:

* Be first point of call for all young person related safeguarding issues in the South Project
* To support and work closely with the Deputy Safeguarding Lead
* Take lead in ensuring appropriate arrangements are in place to keep children and young people safe by promoting safety and welfare in all activities
* Lead on any safeguarding issues that may arise On Call including reporting matters in line with procedure
* Make sure that staff understand policy, procedures and what to do if they have concerns about a child or young person
* Take lead in responding to information that may constitute a child protection concern including concern about an adult involved who may present a risk to children
* Take lead in assessing and clarifying information, updating statutory agencies as appropriate, consulting with and informing the relevant members of the leadership team
* Receive and record information about concerns and retain child protection records according to legal requirements and procedure
* Report regularly to the Director on safeguarding to ensure that it is seen as a priority at all levels of the organisation
* Take lead in implementing safeguarding policies and procedures ensuring safeguarding issues are properly responded to
* Ensure that children and young people who take part in our services know who to talk to if they have a concern and what actions we will take
* Take lead in managing allegations against staff
* Update and analyse the safeguarding log as required and work with the Director to ensure safeguarding best practice is implemented

5.6 It is the responsibility of the Registered Service Manager and the Leadership Team to be:

* Operationally accountable for safeguarding
* Ensure all staff and volunteers are safely recruited
* Ensure staff are suitability trained to respond to safeguarding – see Training Policy
* Hold corporate accountability for ensuring that safeguarding policy and practice is developed, implemented, managed, and monitored across PTIUK
* Ensure safeguarding policies are reviewed annually or with new information – see policy review cycle
* Hold responsibility for all notifications that are required in the case of a serious event (see Annex A)

**6.** **Procedure**

**6.1** **Recognise *– types of abuse***

6.1.1 Child abuse happens when a child or adult harms a child.

6.1.2 All staff need to be able to recognise the signs that a child or young person might be distressed and be vigilant in carrying out this duty

6.1.3 Any child from any culture, faith or background can be at risk of abuse.

6.1.4 Abuse can take place in a family, in an institution or community setting, by telephone or online.

6.1.5 Abuse can be carried out by someone known to the child or much less commonly by a stranger

6.1.6 **Physical Abuse** is intentionally causing physical harm. It includes making up symptoms of an illness or causing a child to become unwell. It may involve hitting, shaking, burning, poisoning, biting, and suffocating, as well as other ways of physically hurting on purpose. Physical abuse can have long lasting effects, lead to poor physical and mental health in later life. Injuries more likely to be indicators of physical abuse might include but is not exclusive to:

* Bruises on babies who are not yet mobile and on cheeks, ears, palms, feet, arms, back, buttocks, tummy and backs of legs
* Bruises in clusters or bruises which look like they have been caused by a hand or object
* Bites and finger mark bruising or grasp marks especially on the limbs of a child
* Scars of different sizes and ages or large scars from untreated injuries
* Fractures to arms, legs or ribs in a small child or multiple injuries over a period of time
* Burns and scald marks with clear outlines, small burns that may be caused by a cigarette

6.1.7 **Emotional Abuse** is any type of abuse that involves continual emotional mistreatment of a child and is sometimes called psychological abuse. It can be difficult to spot the signs of emotional abuse as it usually co-exists with other forms of abuse although can occur alone. Children may not disclose emotional abuse until crisis point. Emotional abuse might include but is not exclusive to:

* Threatening and calling a child undermining or humiliating names
* Making the child the subject of jokes to hurt the child
* Exposing a child to upsetting situations like domestic abuse or drugs
* Failing to promote a child’s social development
* Manipulating or constantly criticising a child
* Not saying anything kind or expressing positive feelings or congratulations to a child

6.1.8 Babies and pre-school children who are being emotionally abused might:

* Be overly affectionate to people they do not know
* Seem unconfident, anxious, wary and struggle to control their emotions
* Seem unable to play or seem not to have a close bond with their primary care giver
* Be aggressive or cruel towards other children or animals

6.1.9 Older children who are being emotionally abused might:

* Be fearful that their parent or carer might be approached about the abuse
* Struggle to control their emotions and perhaps have extreme outbursts
* Act or use language in ways not expected of their age
* Seem isolated from their parents, carers, peers and have difficulties making or maintaining relationships
* Show signs of self-harm

6.1.10 **Neglect** is the persistent failure to meet a child’s basic physical and or psychological needs causing damage to health and development. Neglect can be a lot of things and there are four broad types:

* Physical neglect**:** when a child is not properly supervised or kept safe and their basic needs such as food, clothing and shelter are not met
* Educational neglect: when responsible adults do not ensure the child is in education
* Emotional neglect: when a child does not get the stimulation or nurture, they need
* Medical neglect: when a child is not provided with adequate health care including dental treatment

6.1.11 Signs of neglect might be but is not exclusive to:

* Poor hygiene
* Children who appear hungry or try to steal food
* Children with poor language, communication or social skills for their age, development and circumstances
* Living in an unsuitable home environment such as no heating or unsanitary conditions
* Being left alone for long periods of time
* Anaemia, dental issues, untreated injuries, weight, or growth issues
* Becoming clingy, aggressive, withdrawn, missing education, showing signs of self-harm or not following medical recommendations

6.1.12 **Sexual Abuse or sexual exploitation** involves forcing or tricking a child or young person to take part in sexual activity. They might not understand what is happening is abuse and might be afraid to tell someone. Under the Sexual Offences Act 2003, any sexual activity with a child under the age of 16 is a crime. This may include physical contact and non-contact activity:

* Physical contact abuse can be inappropriate touching, making a child undress or touch someone or full penetration.
* Non-contact abuse is where a child is abused without being touched and this can be in person or online such as exposing or flashing, showing pornography and making or distributing child abuse images for instance.

6.1.13 Signs of sexual abuse might be but are not exclusive to:

* Emotional and behaviour indicators such as language or sexual behaviour not expected of that age
* Being secretive about phone activity or have lots of phone numbers; different email addresses and spending a lot more time than usual online
* Physical signs such as bruises, bleeding, pains and soreness in the genital area, sexually transmitted infections and pregnancy for instance
* Depression and other forms of poor mental health

6.1.14 **Online abuse** - Online abuse is any type of abuse that happens on the internet. It can happen across any device that's connected to the internet, like computers, tablets and mobile phones. And it can happen anywhere online, including on social media, messaging apps, emails, online chat, online gaming and live stream sites. Young people can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying, grooming, stalking or harassment. It can involve:

* Abusive images of children (although these are not confined to the Internet);
* A child or young person being groomed for the purpose of Sexual Abuse
* Exposure to adult abusive images and offensive material via the internet
* Trafficking children for online sexual exploitation.
* The use of the internet, and in particular social media sites, to engage children in extremist ideologies

6.1.15 Signs of online abuse might but are not exclusive to:

* Spending a lot more or a lot less time than usual online, texting, gaming or using social media
* Seeming distant, upset or angry after using the internet or texting
* Being secretive about who they're talking to and what they're doing online or on their mobile phone
* Having lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.

6.1.16 There are other types of abuse including child exploitation, bullying, online abuse, child trafficking and modern slavery, domestic abuse, female genital mutilation, grooming, harmful sexual behaviours, influences of extremism leading to radicalisation, discriminatory abuse, organisational abuse for instance – see PTIUK’s specific policies.

6.1.17 The issue of self harm as a result of abuse and how to deal with this is dealt with separately in detail in PTIUK’s Self Harm Policy.

**6.2** **Recognise – disclosures**

6.2.1 **Disclosure** is the process by which people start to share their experiences of abuse with others. This can take place over time and may happen on more than one occasion – it is a process. It takes exceptional courage for a child or young person to go through the process of disclosing abuse.

6.2.3 All disclosures must be taken seriously.

6.2.4 Children and young people who have been abused may want to tell someone, but not have the exact words or means to do so.

6.2.5 They may attempt to disclose abuse by giving us clues, through their actions and by using indirect words and some children, including unaccompanied asylum-seeking minors, may need an impartial trained interpreter, especially if English is their second language.

6.2.6 When people speak out it can be many years after the abuse has taken place.

6.2.7 Children and young people may disclose abuse in a variety of ways, including:

* Directly: making explicit statements about what is happened to them
* Indirectly: making ambiguous statements which suggest something is wrong
* Behaviourally: displaying behaviour that signals something is wrong
* Non-verbally: writing, drawing pictures or trying to communicate in other ways

6.2.8 Sometimes children and young people make partial disclosures of abuse. This means they give some details but not the whole picture and not all children and young people realise they have experienced abuse, for example if they have been groomed.

6.2.9 **Barriers to disclosure -** children and young people may withhold information about abuse because they:

* + are afraid they will get in trouble with or upset their family, carers or support network
  + lack trust in the people around them and in services
  + fear it will affect their asylum application
  + fear they may be labelled a troublemaker and not be taken seriously
  + feel ashamed and/or guilty and fear it will make the situation worse
  + need to protect themselves from having to relive traumatic events
  + feel embarrassed and/or ashamed to talk to an adult about a private or personal problem
  + worry about confidentiality and fear the consequences of speaking out
  + find formal procedures overwhelming

**6.3** **Recognise - professional boundaries**

6.3.1 Maintaining professional boundaries is crucial for staff working at PTIUK, who are expected to follow our code of conduct because how we present and interact with young people helps to keep everyone safe – see Code of Conduct, Employee HR Handbook.

6.3.2 Support delivery must always agree ground rules, confidentiality and information sharing parameters – see Confidentiality and Data Protection Policy. Maintaining professional boundaries means having reasonable and acceptable conduct, using appropriate language, respecting and keeping personal space, keeping in role, having a clear distinction between the personal and professional, not colluding, being aware of non-verbal communication, modelling pro-social behaviour and adhering to our gifts and gratuities policy for instance.

**6.4** **Recognise - safe spaces**

6.4.1 We recognise that children, young people and communities maximise their potential in an environment which is safe, secure and supportive of their needs, including protection from abuse. We adopt a **Psychologically Informed Environment framework** in our provision of safe spaces and **consider contextual safeguarding** in risk management processes.

**6.5 Procedure – Activities and Risk Management**

6.5.1 All activities are risk assessed to include staff ratios, first aiders, risk management strategies, minimising known triggers for instance and all staff, including volunteers, are safer recruited – see Health and Safety Policy and Safer Recruitment Policy.

6.5.2 We complete **risk assessments** and **risk management plans** specifically tailored to capture contextual safeguarding. **Matching assessments** are key to safeguarding and managing risk and residents with different levels of need – see Support Policy.

**6.6** **Procedure - photographs, images, films and online safety**

6.6.1 **Photos, images and films** - While sharing photographs and films of activities can help us to celebrate the achievements of young people consideration must be given to informed consent and potential risks associated to sharing images; this includes use of phones. Staff must never link with young people via personal devices. We will only store photographs and videos of children, young people, and activities securely, in accordance with data protection law and safeguarding best practice. Consent to take images of children and young people is only meaningful when it is informed, and this may mean accessing an interpreter for instance.

6.6.2 **Online publications** - We will never publish personal information about children or young people online and will only use images and films of young people that are appropriate and dignified and only when the appropriate informed consent has been sought. Informed consent means that all relevant parties understand how the images will be used, stored and are fully aware of the potential risks associated with the use and distribution of images and videos. Therefore, for all photos, images and films in any setting staff must ask for written consent from young people and their Social Worker (e.g. for those under the age of eighteen), parent or carer and make it clear that they can withdraw consent at any point – see Confidentiality and Data Protection Policy.

6.6.3 **Online safety procedure** – We expect staff to:

* Follow our code of conduct
* Make sure online safety is an ongoing part of keywork with children and young people, not just a one-off session.
* Report concerns in line with procedures
* Seek advice from specialist agencies

**6.7**  **Recognise - Homelessness Duty**

6.7.1 **Homelessness duty for public authorities** - There is a new section in the Working Together to Safeguarding Children Act on the homelessness duty that requires public authorities (including social services for early help, leaving care and child protection) to refer any service users they consider to be homeless, or threatened with homelessness, to a housing authority.

6.7.2 Residents facing homelessness must be referred to a housing authority for an assessment. For example, where 28 days’ Notice is given and there if not a viable plan, then a referral to the relevant Housing department should be made before or on the same day. Ordinarily this will be the responsibility of the placing Local Authority.

7. **Procedure – Respond: what to do if you are concerned about a child**

7.1 If you believe **a child to be at immediate risk of harm** you must take immediate steps to protect and **call 999**. For example, if there is a risk to loss of life or a likelihood of serious immediate harm such violence and use of a weapon for instance, as well as informing the allocated Social Worker or Personal Advisor.

7.2 For safeguarding concerns that do not pose an immediate risk of harm you must consult with a designated member of staff on the same day and follow procedure.

7.3 If you are informed about or concerned about a child, you must:

* Always place the child or young person’s welfare and interests first
* Explain that you need to share all disclosures and causes for concerns with the Designated Safeguarding Lead and relevant authorities
* Never talk to the alleged perpetrator about the disclosure. This could make things worse for the child.
* Do not investigate. If anything needs to be clarified in order to understand the safeguarding risk, ask clear, open question by using the TED rule: tell, explain and describe for example ask ‘what, when, who, how, where’ questions and ask ‘is there anything else you want to tell me?’
* Use open body language and make it clear that you are interested in what they say and reflect back to check understanding
* Respect silence, pauses and never interrupt allowing them to go at their own pace using language appropriate to age and needs
* Listen carefully and actively. There is no need to ask questions. Let the child or young person guide the pace and remember their ability to recount an allegation will depend on age, culture, language, communication skills and disability for instance
* Do not show shock at what is being said as this may discourage further disclosure
* Do not ask any ‘why’ questions as these can suggest guilt or responsibility
* Maintain an unbiased approach and tell them what will happen next and keep them informed of process, as appropriate

7.4 In addition to the above if a child discloses abuse directly to you must:

* Reassure the child or young person they have done the right thing in telling you. Make sure they know that abuse is never their fault
* Talk with the child or young person about how best to respond to their safeguarding situation in a way that enhances their involvement, control, and choice throughout the process
* Never promise a child that you will keep what they tell you a secret. Explain that you need to share all disclosures and causes for concern with someone who will be able to help.
* Inform the Designated Safeguarding Lead and relevant Local Authority Social Worker or Personal Advisor.

7.5 Tell children this “I am really concerned about what you have told me, and I have a responsibility to make sure you are safe and tell someone who will be able to help”. **If the child is likely to or has suffered significant harm, they will need to be advised that in these circumstances’ information has to be shared.**

7.6 If a child does not have the capacity to make their own decisions, ask their parent, carer or social worker -unless doing so would put the child at risk of harm or increase risk through delay.

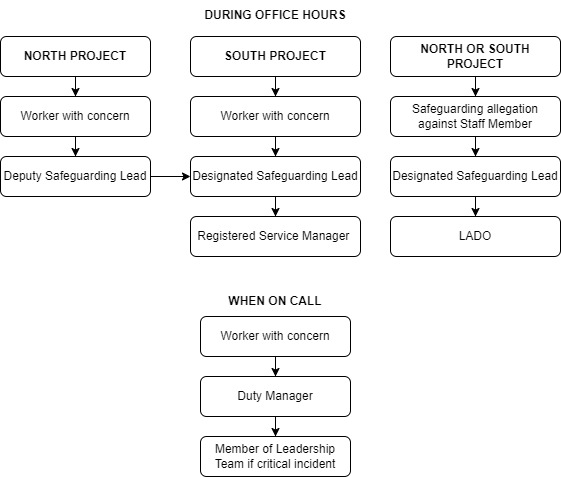
**7.7 If consent is refused or if you are unable to seek consent - you can still share information with the police or Children’s Services if this is in the public interest, which** includes protecting children from significant harm and promoting the welfare of children. This must be the decision of a designated safeguarding staff member who must:

* Consider each case individually
* Decide if the need to share information is in the child’s best interest and whether it outweighs the need to maintain confidentiality
* Consider all the implications of sharing the information
* Keep a written record explaining what steps were taken to get consent and communicate the decision in the referral to Children’s Services

**8.** **Procedure - Report**

8.1 **Internal reporting:** If you are concerned about a child, then first respond by taking the appropriate steps to make sure the young person is safe and then report in line with these flowcharts:

[SEE FLOW CHART ON NEXT PAGE]



8.2 **Timely information sharing** helps to ensure that children receive the right services, early help at the right time before the situation becomes acute. The updated Working Together Guidance clarified that the Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent the sharing of information for the purposes of keeping children safe – see PTIUK Confidentiality and Data Protection Policy.

8.3 **External reporting**: There are a number of situations there is a legal duty to report a safeguarding concern or serious incident to external bodies including the Chief Inspector of Education, Children's Services and Skills (CIECSS, linked to OFSTED), the Local Authorities and, in the case of the death of a child, the Secretary of State. This reporting is the responsibility of the Registered Service Manager. Full details of when external reporting is required and who needs to be informed are detailed in the Supported Accommodation (England) Regulations 2023 Section 27 (reproduced in Annex A)

**9.** **Procedure - Record**

9.1 Itis important to keep accurate and detailed written notes:

* the child’s details (name, age, address)
* what the child said or did that give cause for concern (write down their exact words)
* any information given to you about the alleged abuser
* injuries should be recorded on a body map as appropriate

9.2 We use a **record of concern** form for safeguarding reporting. Forms must be saved securely, and promptly escalated to the appropriate designated safeguarding staff member – see incident reporting policy.

**10.** **Procedure - Refer**

10.1 **Children not supported by Social Services -** referrals to local Children’s Services must be made on the same day where harm or risk of harm has been identified. If concerns arise out of office hours, referrals must be made to the relevant local authority out of hours service – see On Call information.

10.2 Children’s Services are required to provide referrers with a response within 24 hours of receiving a referral and acknowledge receipt**.** If no response has been received within 48 hours, the staff member or their manager must contact the local authority again and, if necessary, ask to speak to a line manager to establish progress. If the local authority’s response is inadequate, or does not sufficiently address the risk of abuse, employees must discuss this with the Designated Safeguarding Lead who will decide if escalation required.

10.3 **Children supported by Social Services** - for the most part it is expected that safeguarding reports will be sent to allocated Social Workers or Personal Advisors due to the nature of our Service. Where staff have safeguarding concerns about a child or young person who already has a child protection plan, is in care, or is in receipt of other services from the local authority you must take the following steps:

* Share the concern with the allocated Social Worker, Personal Advisor or in their absence, their manager or the duty social worker as soon as possible on the same day
* Seek a written response to the concern which outlines the agreed actions and risk management plan

**11.** **Risk management**

11.1 Risk management is best undertaken through planning with the child or young person in order to help them remove, mitigate, and better manage risks and should feature:

* identifying the risks and triggers present to the individual and other residents
* considering potential changes to current circumstances that can be made to reduce the risks present on both a short- and long-term basis
* generating practical, realistic responses to risks assessing vulnerabilities
* considering physical and emotional needs of the person at risk when exploring potential actions and changes encouraging the person to make positive decisions in the interest of their own self-protection
* developing an emergency safety plan with suitable phone numbers.

**12.** **Reassure**

12.1 It is the responsibility of staff to reassure the young person and appropriate persons and professionals of the steps being taken to safeguard them from harm.

**13.** **Managing allegations against staff**

13.1 Whilst some behaviours may not constitute a criminal offence, and some may not reach the threshold of significant harm, consideration will always need to be given as to whether they may indicate unsuitability to work with children. Any such behaviour should be considered within the context of types of abuse and this includes concerns relating to inappropriate relationships between staff and children or young people.

13.2 Our complaints procedure is separate and compromise agreements are never acceptable in relation to allegations against staff.

13.3 Each Local Authority must have one or more Local Authority Designated Officer/s (LADO) whose role is to manage and oversee investigations of allegations against people who work with children.

13.4 The LADO must be informed, within one working day, of all allegations against adults who work with children when they have:

* Behaved in a way that has harmed a child, or may have harmed a child
* Possibly committed a criminal offence against or related to a child
* Behaved towards a child or children in a way that indicates they could pose a risk of harm if they were to work regularly or closely with children

**14. Responsibilities when informed of an allegation against staff**

14.1 It is the responsibility of all staff to:

* Take all allegations seriously
* Follow the procedure for what to do if concerned about a child
* Report all allegations to the Designated Safeguarding Lead or another designated staff member as appropriate

14.2 It is the responsibility of the Designated Safeguarding Lead to:

* Notify and seek advice from the relevant LADO within one working day and before notifying anyone else to ensure that this does not impede disciplinary or investigative processes
* Inform parent(s), social services or carer(s) of the child(ren) involved as appropriate
* Deal with allegations confidentially, sensitively and promptly; with good record keeping of facts and an immediate risk assessment and management plan, which must include situations where the worker resigns
* Lead on referrals to the police and Disclosure and Barring Service in line with procedure and legal requirement
* Provide appropriate support to the person subject to an allegation noting that before informing the person subject to the allegation advice should first be sought from the LADO as the Police and/or Children's Services may want to impose restrictions on information sharing.
* Apart from keeping the child, parents and accused person up to date with progress, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries, manage related disciplinary or suitability processes in line with GDPR.
* Ensure the child knows who has responsibility for keeping them informed of what will happen.
* Always consider the risks of any children related to, living with or in contact with the person in question through other work or community life

14.3 It is the responsibility of the Registered Service Manager and the Leadership Team to:

* Follow procedure in absence of the Designated Safeguarding Lead
* Deal with allegations against the Designated Safeguarding Lead
* Support the Designated Safeguarding Lead as appropriate
* Hold responsibility for all notifications that are required in the case of an allegation (see Annex A)

**15.** **Managing Interim Risk during allegations**

15.1 Decisions around risk are best made in a multi-agency forum in a strategy meeting with Children’s Services, police, and the LADO for instance.

15.2 The Leadership Team will consider carefully whether the circumstances warrant a staff member being suspended from contact with vulnerable groups whilst investigations continue. Only PTIUK, has the power to refrain or suspend those accused.

15.3 Suspension should be considered in any case where there is cause to suspect a child or young person is at risk of or has suffered significant harm, or the allegation warrants investigation by the police, or is so serious that it might be grounds for dismissal.

15.4 The Registered Service Manager and the Leadership Team will consider:

* Redeployment: so not to come into contact with children
* Refraining: agreeing that the person will not work with children during the investigation
* Suspension: when an employee is sent home from work

15.5 In view of the fact that an investigation will follow, a broad rationale for suspension can be given and ultimately it is based on the principle that suspension is intended to be a neutral act to facilitate the investigation.

15.6 If suspension is deemed appropriate, the reasons and justification should be recorded, and the individual notified of the reasons and will consider in any situation where:

* There is reason to suspect a child is at risk of significant harm
* The allegation warrants investigation by the police
* The allegation is so serious that it might be grounds for dismissal

**16.**  **Disclosure and Barring Services (DBS)**

16.1 If a member of staff is suspected as being unsuitable to work with children or vulnerable adults, a referral must be made to the DBS explaining the nature of the concerns and stating any investigations or disciplinary hearing a staff member has been involved with.

16.2 This referral should only be made by an appropriate member of the Leadership Team after full consideration and consultation with the LADO.

**Annex A**

**The Supported Accommodation (England) Regulations 2023 –**

**Regulation 27 - Notification of a Serious Event**

**27.**—(1) If a child dies, the registered person must without delay notify—

(a)the CIECSS;

(b)the accommodating authority;

(c)the Secretary of State;

(d)the local authority in whose area the premises used as supported accommodation are located (if that local authority is not the accommodating authority);

(e)the integrated care board (established under Chapter A3 of Part 2 of the National Health Service Act 2006([**1**](https://www.legislation.gov.uk/uksi/2023/416/regulation/27/made#f00019))) for the area in which the premises used as supported accommodation are located;

(f)any relevant person not included in sub-paragraphs (a) to (e).

(2) If there is a referral of a person working for the supported accommodation undertaking pursuant to section 35 of the Safeguarding Vulnerable Groups Act 2006([**2**](https://www.legislation.gov.uk/uksi/2023/416/regulation/27/made#f00020)), the registered person must without delay notify—

(a)the CIECSS;

(b)the accommodating authority;

(c)any relevant person not included in sub-paragraphs (a) and (b).

(3) The registered person must notify the CIECSS and any relevant person without delay if—

(a)a child is involved in or subject to, or is suspected of being involved in or subject to, sexual exploitation or child criminal exploitation;

(b)an incident requiring police involvement occurs in relation to a child and the registered person considers that incident to be serious;

(c)there is an allegation of abuse against the supported accommodation undertaking or a person working for it;

(d)a child protection enquiry—

(i)is instigated, or

(ii)concludes (in which case, the notification must include the outcome of the child protection enquiry);

(e)there is an incident involving the use of a measure of restraint of a child;

(f)there is any other incident relating to a child which the registered person considers to be serious.

(4) The registered person must ensure that a notification made under this regulation—

(a)includes details of—

(i)the event concerned;

(ii)any other individuals or organisations who or which have been notified;

(iii)any actions taken by the registered person as a result of the matter;

(b)is made or confirmed in writing.