



Willow Lodge Supported Accommodation Policy

Safeguarding Children and Young Adults Policy

Contents

1. Summary
2. What is the policy about?
3. Who is the policy for?
4. Policy Statement
5. Definitions
6. Reporting concerns
7. Allegations against Willow Lodge Staff
8. Allegations against third party providers
9. Training and Support
10. Staff recruitment and selection
11. Disciplinary Investigations into Child Protection Allegations Made Against Staff
12. Supervision and Monitoring
13. Whistle blowing
14. Personal responsibility
15. Information sharing, consent and record keeping
16. The use of social media and e-safety

This policy will be reviewed on an annual basis or sooner should a review of safeguarding procedures be required. Willow Lodge Supported Accommodation reserves the right to amend this policy, following consultation, where appropriate.

Date of last review: February 2020

Date of next review: February 2021

Who to contact: Safeguarding Lead

Version: 1

1. Summary

At Willow Lodge we believe that every resident deserves the chance to live in a safe environment. The key to this approach is our commitment and perseverance ensuring that all children & adults who live at our home are protected from harm and our staff are undertaking that role to enable those young adults to have optimum life chances and to enter adulthood successfully.

2. What is the policy about?

This policy provides details about safeguarding (including prevent) responsibilities and arrangements in place, to address concerns and allegations about abuse and neglect affecting children and young adults. The purpose of this policy is to:

- Ensure that all children and young people who are receiving services from us or who are in contact with the service for any reason are protected from all forms of abuse or any significant harm.
- Supporting vulnerable children & young adults, service users through its safeguarding agenda in order to prevent potential radicalisation (prevent)
- Acknowledge that all staff members of Willow Lodge (including third party providers) have a responsibility to act where there is cause for concern about service users safety and well-being.
- Promote best practice and a positive organisational culture which encourages the promotion of welfare of children & young adults and ensures their safety.
- Ensure that we encourage working together with young people, their local authorities, health services and advocates as much as possible, in situations where there is cause for concern.
- Provide mandatory procedures, which must be adopted in any situation where there is cause to be concerned that a child or young person has experienced or is at risk of some form of abuse or any significant harm.

2.1 The policy will also, clarify the roles and responsibilities of Willow Lodge and other agencies, especially those with a statutory responsibility. The policy is comparable with other Willow Lodge policies (see section 10)

2.2 The responsibility for decision making over issues of child protection lies with Surrey Council, the local authority for the area we are based. Willow Lodge will develop links with the Local Safeguarding Children's Board (LSCB) and will ensure that our Safeguarding and Child Protection procedures are in accordance with both Surrey Safeguarding Children Procedures and the child's/ young person/ adult responsible placing authority procedures.

For young people/ adults placed outside of their 'home' authority, the local authority in which they are placed may choose to liaise with the young person/ adult responsible authority over aspects of child protection investigations.

It is not Willow Lodge's responsibility to determine who does what externally, but staff do have a role in supporting investigations e.g. through providing timely and accurate information.

2.3 For the purpose of this policy, the term 'children' refers to children under the age of 18 and young adults under the age of 25.

3. Who is the policy for?

All Willow Lodge staff, associates and third-party providers have a duty of care to safeguard and promote the welfare of children and young people. Everyone working with children and young people should be familiar with these procedures and have a duty to report any safeguarding concern to the relevant local authority and Willow Lodge Supported Accommodation.

4. Policy statement

We are fully committed to safeguarding the welfare of children and young people by taking all reasonable steps to protect them from neglect, physical, sexual or emotional harm. The development and implementation of this policy and procedures are to be seen as an integral part of Willow Lodge determination to provide high quality responsive services, which meet the needs of our service users.

Our approach to safeguarding and child protection is based on principles recognised in UK legislation and international agreements.¹ The welfare and protection of children and young people is paramount. All children regardless of age, disability, racial heritage, religious belief and sexual orientation or identify have the right to protection from all types of harm and abuse. We recognise the importance in working in partnership with statutory organisations, agencies, parents and carers in the prevention and response to incidents or allegation of harm and abuse to children.

5. Definitions

¹ *The Children Act 1989 and 2004, The Children (Northern Ireland) Order 1995, Working Together to Safeguard Children 2013, The UN Convention on the Right of the child UK ratified 1991, The Human Rights Act 1998, The Data protection Act 1984, and 1998, The Safeguarding Vulnerable Groups Act 2006 Working Together to Safeguard Children (2018)*

It might be difficult to accept, but every child/ young person can be hurt, put at risk of harm or abused, regardless of their needs, status or circumstances. Safeguarding legislation and government guidance says that safeguarding means:

- 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
- and taking action to enable all children to have the best outcomes²
- preventing vulnerable people from being drawn into violent extremist or terrorist behaviour

What is abuse and neglect²?

Abuse and neglect are forms of maltreatment of a child or vulnerable person. Somebody may abuse or neglect another person by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or more rarely by a stranger. They may be abused by an adult or adults, or another child or children.

It is generally accepted that there are four main types of abuse:

- Neglect, Emotional, Physical, Sexual

These categories of abuse are those generally used by Children’s Social Care Services and the Police. Working Together (2018) provides clear definitions of these forms of abuse along with the UK National Working Group for Sexually Exploited Children and Young People (NWG) (See Appendix A)

6. Reporting concerns

6.1 Responsibility to report concerns

It is not the responsibility of Willow Lodge to decide whether or not child abuse has taken place. It is the responsibility of staff at Willow Lodge to act if there is cause for concern in order that the appropriate agencies (Children Services/ LADO – Local Authority Designated Officer) can investigate and take necessary action to protect a child or young person.

Willow Lodge staff do not investigate but do make the judgement ‘if this incident or situation were true, is this cause for concern?’

6.2 Responding to concerns

²Working Together to Safeguarding Children (2018)

A child protection concern may come to your attention in a number of ways. In all circumstances the child's immediate health and safety must take priority. In relation to any injury that comes to your attention you must consider the need for:

- Immediate medical attention
- Immediate action to protect

In these circumstances you may need to make immediate contact with emergency health services, police or Children's Social Care. Willow Lodge reporting procedures will subsequently apply to any immediate action taken to safeguard a child and young person.

Disclosures of abuse can be frightening and difficult for the child or young person. If a child confides in you, that they are being hurt or have been abused they have placed you in a position of trust. They trust you to help them, but you must make it clear that you cannot keep the disclosure 'a secret.'

You should:

- React calmly and in an encouraging manner
- Advise them that they are right to tell
- Emphasise that they are not to blame
- Take what is being said seriously and communicate this to them
- Keep questions to the minimum necessary for ensuring a clear and accurate picture of what is being said to you
- Remember you are not to investigate
- Be clear that there are certain people that you will have to tell in order to make sure that necessary action is taken
- Stress it is part of your job to keep children and young people safe
- Make a full record of what is communicated as soon as possible. This should include exact words used, behaviour and other forms of communication
- Do not delay in passing the information on to your line manager

6.3 Recording of concerns

It is crucial that all concerns are properly recorded. The records may be needed later to contribute to a report on the child and their family by Children's Social Care or in some cases as part of civil court proceedings under the Children Act 1989.

Prevent Duty

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is

needed. The group may include statutory and non-statutory partners, health and safeguarding lead professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

Willow Lodge staff can make a referral to the Channel Panel (MASH – Multi-agency Safeguarding Hub). Referrals come from a wide range of partners including education, health, various care settings, youth offending teams, police and social services.

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

The following information, if available, should be recorded:

- Name and address of the child
- Age and date of birth
- Ethnic origin
- Religion, if any
- Disability, if any
- Preferred communication method and language
- Name and address of adults involved in the incident/concern/allegation
- Date and time of the alleged incident
- Nature of injury, behaviour or concern
- When the behaviour or injury was first noticed.
- The child's explanation in his/her own words as verbatim as possible
- The child's developmental needs and the capacity of the child's parents or carers to meet those needs (through the provision of facts or identified professional opinion)
- Date and time of the recording
- Any questions that were asked
- Signature of the person recording the concern

Some of this information may not be available to you. Do not pursue the questioning of a child. It is important that they freely volunteer whatever information they wish you to have.

When recording, you need to ensure you separate fact from opinion by setting out the facts first. Having an opinion is entirely valid and may be crucial but it must not be confused with factual information.

All written records about a child must be retained securely and confidentially and marked as sensitive within the relevant service recording system.

6.3.1 Confidentiality

It is very important that children and young people are aware of their right to confidentiality. It's a good practice to ensure children and young people are aware of this right from the start of their involvement with the service/s (see appendix B). This is to ensure that, if a staff member must break that confidentiality due to a safeguarding matter that the individual/ service user will understand this and will not feel betrayed or let down. No safeguarding (including prevent) matter can be kept confidential and this must be made clear to all children and young people (and where appropriate), their friends, carers/ families accessing our services.

6.4 Reporting concerns

6.4.1 Line Management:

Every staff member must ensure that disclosures are reported to their line manager immediately/ the Willow Lodge Designated Safeguard lead. In their absence, staff are instructed to contact the Head of Service, who is also a DSL. Depending on circumstances one of these persons must be contacted and informed immediately. In consultation with the staff member the line manager or the Head of Service (in absence of the line manager) will decide as to whether a referral to Children's or Adult's Social Care is necessary/ will take place.

6.4.2 Children and Adult's Social Care

If the child/ young adult has a named social worker, s/he should be contacted immediately via telephone and advised that you intend to make a formal safeguarding referral. If the social worker is not available, ask to speak to the team duty social worker and advise them that you intend to make a formal safeguarding referral. You will be required to provide details of the referral over the telephone including the **name, date of birth and address of the child/ adult as well as details of the disclosure.**

If the child/ adult does not have a named social worker you must contact the Social Care and access team or out of hours emergency duty team (EDT) stating that you wish to make a formal safeguarding referral. Again, you will be required to provide details of the referral over the telephone including the **name, date of birth and address of the child as well as details of the disclosure.**

Telephone referrals to Children's Social Care must be followed up in writing within 48 hours of the telephone referral taking place. Some Local Authorities have their own referral format which must be completed. For those that do not, a written referral must be made on Willow Lodge letter headed paper including as the letter reference the child/young person's name, date of birth and address. The letter must indicate who you are and how you have come to be involved with the child, the details of the disclosure, and what you have said to

them. In accordance with 'Working Together' 2018 you may also stipulate the requirement for a response from Children's Social Care as to how they intend to respond, within 24 hours of them receiving the letter.

Referrals in writing to be attached with an email and securely emailed or faxed with a delivery and read receipt. Formal email notifications can be accepted at times depending on Children's Social Care request.

Social Care departments have a duty under the Children Act 1989 to decide on a course of action within one working day of receiving a referral. If they decide to proceed to an initial assessment of the child/young person, this must be completed within 45 days of receipt of the initial referral.

6.4.3. Parents/Carers

It is important in the case of children making disclosures to communicate this to the child's parent/carer if applicable/ suitable. It is they who have primary responsibility for the safety and wellbeing of the child. This should be done in consultation and with support of the child. If however sharing the allegation with the parent/carer would impede any subsequent investigation or place the child at greater risk, the matter may be referred without notifying the parent/carer, and this must be made clear to Children's Social Care. All decisions must be made in consultation with a line manager.

7. Allegations against Willow Lodge staff

Any allegation of abuse against a Willow Lodge staff member must be taken seriously, both for the sake of the child/ young person and the member of staff.

Staff receiving the allegation will follow the same process for responding to concerns (see 6.2 above). In relation to reporting concerns however, the receiving staff member will contact the manager of the staff member against whom the allegation has been made. The staff member who is the subject of the allegation must NOT be informed of the allegation at this point.

The manager of the staff member who is the subject of the allegation should refer the matter immediately to their Head of Service or in her absence the person acting for her.

The Head of Service will then decide whether the incident is serious enough to be considered as a potential safeguarding matter OR whether the allegation is less serious, in which case it should be dealt with under Willow Lodge, Complaints Policy and if appropriate disciplinary procedures.

If there is insufficient information to make this decision, the Head of Service will need to decide as a matter of urgency, what information is needed and how this should be obtained,

so that a decision can then be taken as to whether or not this situation should be considered as a matter of potential abuse.

If the Head of Service decides that the situation should be considered as potential abuse, she will consult with the relevant Local Authority Designated Officer (LADO) and request that an emergency strategy meeting be convened to plan the process of investigation. The Head of Service will also need to decide whether for the duration of the investigation, the member of staff should continue in their work, be moved to other duties or be suspended in accordance with the terms of the Disciplinary Policy and Procedures. The LADO will be kept informed of all decisions taken by Willow Lodge in relation to the staff member.

If, the matter is to be investigated then the Head of Service will advise the staff member that an allegation has been made against him/her and the matter has been referred to the Local Authority for investigation. To avoid prejudicing the investigation the details of the allegation should not be discussed prior to investigation and the staff member will be instructed not to discuss this with other colleagues. The staff member will be advised to take legal advice.

Once the investigation is completed, the Head of Service will decide whether any further action is needed in relation to the information arising from the investigation. Depending on the outcome of the investigation it may be necessary to commence Willow Lodge formal disciplinary policy and this much be conveyed to the staff member within seven days of the completion of the investigation.

8. Allegations against Third Party Providers

Regarding any allegation of abuse against a Willow Lodge third party provider, staff receiving the allegation will follow the same process for responding to concerns (see 6.2 above). In relation to reporting concerns the receiving staff member will contact their line manager, who in consultation with the Head of Service will inform the line manager of the staff member subject to allegation within the providing organisation. The staff member belonging to the third party, who is the subject of the allegation, must NOT be informed of the allegation. The matter will be handed to the providing organisation to follow in accordance with their own safeguarding, complaints and disciplinary processes. It would be the responsibility of the providing agency to inform the LADO.

9. Training and Support

9.1 Training

All staff commencing employment with Willow Lodge will be given an induction which includes child protection training proportionate to their roles and responsibilities. This will include: how to recognise signs of abuse, how to respond to any concerns, familiarisation with the safeguarding and child protection policy, Willow Lodge staff behaviour/code of

conduct and the role of the Designated Safeguarding Lead. We will ensure that staff understand the difference between a safeguarding concern and a child/ young person in immediate danger or at risk of significant harm.

All Willow Lodge staff are required to complete the safeguarding training within 4 weeks as part of their training induction requirement/ process.

Further to this, all staff must attend:

- All staff must to undertake the mandatory training with Educare.
- Prevent Referrals, Prevent Awareness, Female Genital Mutilation (FMG), free of charge online trainings on:

<http://www.fgmelearning.co.uk/>

<https://www.elearning.prevent.homeoffice.gov.uk/preventreferrals>

<http://www.elearning.prevent.homeoffice.gov.uk/>

as part of wider Safeguarding Training to ensure all staff have the skills and knowledge to refer any concerns appropriately. Additional information, toolkits and best practice are available on the website. Training to be complete within 6 months of commencing the employment then every 2-3 years.

- And where appropriate, Local Safeguarding Children's Board (LSCB) training Level 1 and also Channel Awareness training (Local Authority, Police, Ofsted - online) within 12 months from the start of their employment as an alternative where appropriate to their role or if interested.

<https://www.elearning.prevent.homeoffice.gov.uk/channelawareness>

- On the first day of employment all staff will receive a Safeguarding Briefing with our DSL (Designated Safeguarding Lead)
- Willow Lodge mandates that all staff working here must have annual refresher training in Safeguarding

9.2 Designated Safeguarding Training

The Designated Safeguarding Lead will provide regular briefings to Willow Lodge staff on: any changes to child protection legislation and procedures; relevant learning from local and national serious case reviews and local service provision. Willow Lodge will maintain accurate records of satisfactory completion of all staff child protection and safeguarding training.

In order to ensure training is commensurate with the responsibilities of leading safeguarding and child protection work the following training arrangements are in place:

every TWO years leads shall have the full level 3 training course as a refresher day-

- 3 stage training from the local LSCB to ensure knowledge of local procedures and thresholds are up to date

Every ONE-year leads shall have refresher training via the following three pathways:

- The National Safeguarding and Child Protection Conferences
- LSCB events

In addition, the DSL should remain signed up to the following Newsletters:

- OFSTED news
- NSPCC Safeguarding InFocus
- DBS News

All staff in direct contact with the young people will receive:

- Initial Child Protection Procedure training as part of their induction training which will ensure they have read and understood this policy and procedure
- On-going training in *Safeguarding, FGM, child sexual exploitation, missing children, radicalisation and extremism etc*
- Introduction to child protection training, using Surrey Safeguarding Children Board Child Protection Procedures. Selected staff will also attend multi-agency child protection training and more advanced programme courses including recruitment and vetting of staff
- Additional training will be provided to meet the young people/ adults individual identified needs as required.
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9.2 Support

Receiving and responding to disclosures of abuse by children and young people can have a strong emotional impact and you must not underestimate the potential impact of this. It is important that you are emotionally supported in dealing with safeguarding matters, initially through your line management chain.

9.2.1 Support for staff during a period of suspension

At the point of suspension, the staff member will be allocated a contact who will keep them updated on proceedings and process matters and offer emotional support.

Where practical a meeting will be held with the employee when it will be explained that an allegation has been made, in connection with possible child abuse, and that the member of staff is being suspended, pending investigation of the matter. The employee has the right to be accompanied to this by a colleague or union representative. Where a meeting is not practical the staff member will be contacted via telephone. The employee will be told:

- that he/she will continue to receive normal pay
- the anticipated suspension period, if known

- of other rules (e.g. that he/she must not return to the workplace or contact the young person or members of staff)
- to return any special items required (e.g. keys, computer disks etc.)
- of a named point of contact at Willow Lodge during the period of suspension, for matters not relating to the allegation, and for support
- the name of the person to contact for support

These arrangements must be confirmed in writing to the employee, within four calendar days of the allegation being made, and handed to the employee, or posted to his/her home address via recorded delivery.

10. Staff Recruitment and Selection

Willow Lodge has in place a comprehensive series of systems and checks, which assist in the safe recruitment and selection of staff. Prior to appointment, all staff are subject to a Disclosure & Barring Service check at the enhanced level and candidates must provide proof of identity through official documents and qualifications and references are checked for authenticity.

All staff must provide a full employment history with any gaps fully explained and all appointments will be subject to a minimum of two references having been received (one of which must be the most recent employer) and checked. Referees will be reminded that references must not contain any material miss statement or omission relevant to the suitability of the applicant.

Even the most careful selection process cannot guarantee the suitability of candidates and all new appointments will be subject to a probationary period. On commencement of duties all staff participate in the Staff Support and Development Programme which provides regular, planned and supportive supervision, guidance and development opportunities.

11. Disciplinary Investigations into Child Protection Allegations Made Against Staff

Disciplinary action will not be taken in circumstances that could interfere with a child protection investigation. Child protection investigations shall be treated as paramount and further disciplinary action may have to wait until completion of child protection and criminal investigation. Disciplinary action, if appropriate, must then be undertaken as soon as possible.

When child protection and criminal investigations are proceeding, the decision to also investigate under disciplinary procedures will be discussed and agreed at the Strategy Meeting. If neither child protection nor criminal proceedings are considered appropriate, the Manager in consultation with Head of Service will decide whether to

investigate under the appropriate disciplinary procedure and, if applicable, appoint a person to do so.

In the case of the Manager becoming the subject of an allegation, this will be a matter for the Head of Service. The matter must be investigated in line with Willow Lodge Disciplinary Procedures and a Formal Disciplinary hearing convened. As investigations and hearings relate to Child Protection Concerns, a decision must be reached on the appropriate course of action, based on whether the allegation has been sustained 'on the balance of probability' rather than 'beyond reasonable doubt'.

Evidence derived from a Child Protection Investigation e.g. statements, exhibits, transcripts of video recorded interviews with children may be made available for use in subsequent disciplinary proceedings, prior to which, availability must be discussed at a Strategy Meeting. Where allegations are unsubstantiated, the Manager/ Head of Service is responsible for ensuring that a return to work is handled smoothly and sensitively.

12. Supervision and Monitoring

All staff in Willow Lodge have 1:1 supervision and issues of welfare, safeguarding and child protection are routinely covered within these. Staff is supervised by the Manager and the Manager is supervised by the Head of Service. Staff have a specific task to monitor and give support around safeguarding and child protection procedures, including notifications to external agencies. Staff will have focus on individual young people/ adults and those for whom there are no live issues will also be discussed so that issues that do not meet the thresholds for notification, patterns of risk and of protective work can be noted. The supervision will take place between 6- 8 weeks. Each supervision needs to book in advance and agreed by both parties. The outcomes of the supervision/meeting are shared with the Manager of the Willow Lodge and data from the meetings is presented to the Head of Service. Alternate meetings are attended by Willow Lodge Safeguarding Lead/ HR Operation Officer or Head of Service who scrutinises referrals for compliance with guidance and good practice. Those representatives will also scrutinise occasions of recruitment for compliance with policy and legislation and support the production of the annual safeguarding audit, which is shared with the local safeguarding board. The Manager or Willow Lodge Safeguarding Lead will attend Monitoring and Advisory Panel meeting and share the findings of the audit as an annual report on the quality of safeguarding within the setting.

13. Whistle Blowing

Willow Lodge recognise that young people/ vulnerable adults cannot be expected to raise concerns in an environment where adults feel unable to do so. Willow Lodge have a clear reporting procedure for children and young people/ adults, family or visitors and other people to report concerns or complaints, including abusive or poor practice. We

will actively seek the views of children and young people, family, professionals, third parties or staff members on our child protection arrangements through surveys, questionnaires and other means.

Consistent with the emphasis Willow Lodge places on the safety and welfare of the children and young people living in the setting, the integrity of the business, and the need to act with uncompromising ethics, we believe all staff working at Willow Lodge, or concerned with its management and organisation, or associated with the work of Willow Lodge, should be able to raise issues of concern if they feel that wrongdoing or bad practice is occurring.

If the staff has a concern with the manager, they should bring their concerns to the attention of their HR Operation Officer in the first instance, or otherwise with the Head of Service.

All staff employed by Cameron and Cooper Limited are made aware of their right and duty to "whistle-blow" and supported to feel confident to voice concerns about the attitude or actions of colleagues. If an adult believes that a reported allegation or concern is not being dealt with appropriately by the Manager or Cameron and Cooper Limited, they should report the matter to the Local Authority Designated Officer / Designated Officer (contact details are below) Alternatively the telephone number of the NSPCC whistleblowing advice line is available in staff workspaces throughout the Willow Lodge/ Cameron and Cooper Limited.

14. Personal Responsibility

It is the duty of all staff employed by Willow Lodge to report any of the following incidents whether these actions have been committed, are currently being committed, are likely to be committed or are suspected of being committed.

- Criminal activity
- Failure to comply with legal obligation, including the PREVENT duty and the Mandatory reporting of Female Genital Mutilation.
- Miscarriage of justice
- Endangering health and safety of individuals
- Damage to environment
- Malpractice by colleagues
- Deliberate concealment of information concerning one of the preceding sets of circumstances

No prejudice or discrimination will be taken against a person who, in good faith, reports such incidents. Any person reporting such incidents will be made aware of whether this will remain confidential or whether there will be a need to disclose who has reported the incident to a third party.

15. Information Sharing, Consent and Record Keeping

No single professional can have a full picture of a child's/ young adults needs and circumstances and, if children and young adults are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Personal information about children and young adult is normally subject to a duty of confidence and would not normally be disclosed without the consent of the young person. However, The Children Act 1989 allows disclosure of confidential information necessary to safeguard the welfare of children.

Consent to share information; including any referrals that will be made should be sought from the young person/ adult and the referring local authority representative. The exception to this would be if gaining consent would increase the potential risk to the child or in cases of suspected sexual abuse or fabricated/induced illness by proxy.

Children must not be promised confidentiality but must be re-assured that information will be shared on a need to know basis only and will be treated as confidential.

All matters relating to child protection are confidential and care must be taken with whom the information is shared. However, all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

Do not give a guarantee to a child or young person/ adult that whatever has been said will be kept confidential. If you are told about abuse you have a responsibility to report it. If asked, explain that, if you are going to be told something very important that involves the young person's safety and it needs to be sorted out, you will need to tell the people/ professionals who can do this, but that you will only tell people who have to know.

Matters related to Child Protection are of a confidential nature. The designated person will therefore share detailed information about a young person and other staff members on a need to know basis only.

All staff must be aware that they have a professional responsibility to share information with other relevant agencies where necessary to safeguard and promote the welfare of children.

Willow Lodge will develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters, including attendance at CP case conferences wherever possible and providing reports as a

matter of course. Willow lodge will also contribute to multi-agency assessments of children's needs where appropriate.

Consent is not necessary in cases where Children's Social Work Services are making child protection enquiries under section 47 of the Children Act 1989. Information needs to be shared with Children's Social Work Services; staff members must make sure to record what information has been shared.

15.1 Record Keeping

The principles of Willow Lodge Record Keeping Policy must be adhered to, and all Child Protection concerns must be recorded in line with the home's recording procedures, including maintaining a Child Protection Log in the home. An accurate written record of all that has occurred must be made and filed in the Child Protection section of the young person's file. All relevant reports and meeting minutes, e.g.

Strategy Meeting minutes must also be placed in the Child Protection section of the file. Weekly updates should refer briefly to child protection issues, without recording specific details, and must be cross referred to full details, which are usually kept in the Child Protection section of the young person's file. In some cases, this information may be stored separately, e.g. to provide tighter confidentiality, where this has been agreed with the young person and it is not necessary for all staff to know specific information, or where concerns relate to a member of staff. A summary record must be made in the child protection log held in the homes safeguarding file of the concern, the action taken and the outcome.

Any requests to provide statements for either the police or courts should be referred immediately to the Manager or Head of Service. Evidence derived from a Child Protection Investigation e.g. statements, exhibits, transcripts of video-recorded interviews with children may be made available for use in subsequent disciplinary proceedings, prior to which, availability must be discussed at a Strategy Meeting.

Records should not be photocopied unless permission has been sought from the Manager or Head of Service. Written records are kept of all concerns, whether or not there is a need to refer the matter immediately, and that these records are kept securely, separate from the main young person file, and in locked locations.

16. The use of social media and E-safety

Willow Lodge are guided by information from dedicated agencies such as The Safe Network which provides information and resources to help keep young people safe, Barnardo's and the NSPCC. ChildLine, for example, offers the following:

- *Be careful what you share online:* When you choose a profile picture for a social networking website like Facebook or Twitter, avoid photos that could give strangers clues about where you live. Check your privacy settings regularly. Think about what should be shared in public and what shouldn't.
- Learn about how you can take care of your digital footprints.
- *Think before you post:* Don't upload or share anything you wouldn't want your parents, teachers or friends seeing. Once you press send, it is no longer private. Find out more about sexting and staying in control.
- *Never share or reveal your passwords:* Use strong passwords that are hard for others to guess, using a mix of letters and numbers. Keep passwords to yourself and change them regularly
- *Be careful who you chat to:* If somebody you don't know adds you as a friend, ignore them and delete their request.

Don't share personal information like your address or phone number with somebody you don't know. Learn about the signs that someone abusive is grooming you online.

16.1 The internet and abuse of children

The internet has become a significant tool in the distribution of child pornography. Some adults or young people displaying predatory behaviour use it to establish contact with children with a view to grooming them for inappropriate or abusive relationships.

Willow Lodge will take all available steps to prevent misuse of the internet, and abuse of children/ young people through this medium, by ensuring all house computers used by the young people have appropriate parental control software installed.

However, the young people will have access to the internet through a variety of other means, e.g. during home contact, at friends' homes or through use of other people's mobile phones. As control can be limited, staff must pay attention to any discussion about internet use away from Willow Lodge and must discuss safety around this with the young people.

Where there are concerns that young person is being groomed through the internet, this must be reported in line with the 'procedures/action to be taken in relation to suspicion or allegation of abuse.

APPENDIX A

Forms of Abuse

Extract taken from Working Together to Safeguard Children 2018.

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 child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse

The persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may include not giving the child 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 children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve 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 children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a

child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

³Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment.

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

Child Sexual Exploitation

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability. **(UK National Working Group for Sexually Exploited Children and Young People (NWG) and is used in statutory guidance for England).**

⁴Female Genital Mutilation

FGM is a criminal offence – it is child abuse and a form of violence against women and girls, and therefore should be treated as such.

(FGM) 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. The practice causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child. (HM Government 2015). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person (see below). Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

INDICATIONS THAT FGM MAY BE ABOUT TO TAKE PLACE SOON:

- It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.
- A professional may hear reference to FGM in conversation, i.e. a girl may tell other children about it.
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may request help from an adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent.
- Parents seeking to withdraw their children from learning about FGM

INDICATIONS THAT FGM MAY HAVE ALREADY TAKEN PLACE:

- A girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating.
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems
- A girl or woman may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from school or college.
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.

- A girl or woman may be particularly reluctant to undergo normal medical examinations.

^{3/4}Multi- Agency Practice Guidance on female genital mutation (2014), Multi- Agency Statutory Guidance on female genital mutation (2015)

- A girl or woman may confide in a professional
- A girl or woman may ask for help but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs

Forced Marriage

A forced marriage is a marriage in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities or mental incapacity, cannot) consent to the marriage and violence, threats or any other form of coercion is involved. Coercion may include emotional force, physical force or the threat of physical force and financial pressure.

Domestic Violence/Abuse

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members² regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

- psychological
- physical
- sexual
- financial
- emotional

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.

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.

The Government definition, which is not a legal definition, includes so called 'honour' based violence, including FGM and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

²Family members are: mother, father, son, daughter, brother, sister & grandparents; directly-related, in-laws or step-family
Multi-agency statutory guidance on female genital mutilation 2016: 6

The Prevent Duty

Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy (Sections 21, 24 of the Counter Terrorism and Security Act 2015 (the Act))

The Prevent strategy is part of CONTEST (the Government's counter terrorism strategy) and was published in 2011 with three objectives:

1. Respond to the ideological challenge of terrorism and the threat we face from those who promote it
2. Prevent people from being drawn into terrorism and ensure they are given appropriate advice and support; and
3. Work with sectors and institutions where there are risks of radicalisation that we need to address.

The Prevent strategy defines extremism as ***“vocal or active opposition to fundamental British values; including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs”***. Extremism is also ***“calling for the death of members of UK armed forces”***.

The Prevent strategy also deals with all forms of terrorism and non-violent extremism, since this can create an atmosphere conducive to terrorism and popularise views which terrorism exploit.

Section 21 of the Counter Terrorism and Security Act 2015 (the Act) places a duty on certain bodies to have ***“due regard to the need to prevent people from being drawn into terrorism”***. This includes organisations such as Willow Lodge who are providing services on behalf of Local Authorities, providers on the Skills Funding Agency's Register of Training Organisation (ROTO), NHS providers, Community Rehabilitation Company (CRC)/National Probation Service (NPS) providers and publically funded school, will have the 'duty' applied to them and make sure they are part of the LA's safeguarding arrangements. These organisations must be aware of how to contribute to Prevent related activity in their areas, where appropriate

Willow Lodge acknowledges and supports the Government's range of measures to challenge extremism in the UK, including:

- where necessary, preventing apologists for terrorism and extremism from travelling to this country

- giving guidance to local authorities, public bodies and other organisations and institutions (working on their behalf) to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
- supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations
- supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

Abuse by another Child or Young Person

It is not always adults who abuse. Some children/young people physically, sexually and/or emotionally abuse other. Risk assessments are undertaken, in relation to all young people referred to Willow Lodge, in order to ensure, as far as possible, that children are not placed if they present a risk to others.

The possibility cannot be ruled out completely, however, and staff members need to be alert to this by treating very seriously any allegation or suspicion of abuse. An allegation or suspicion of abuse could come to the attention of staff in relation to children placed at Willow Lodge abusing other children in the residential home, school, community or family setting, or an external child/young person abusing a child in placement, e.g. a sibling in the family whilst the child is on home contact. The consequences for the victim in these situations can be just as harmful as perpetration of abuse by an adult. Therefore, the situation must be treated with the same degree of gravity and the local area safeguarding children board procedures and the homes child procedures must be followed.

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred however, particularly where sexual behaviour is concerned. The procedures should assist in distinguishing between behaviour that may be abusive, requiring a Child Protection referral, and behaviour that may be exploratory, or inappropriate, and better addressed via education or the bullying procedure. If in any doubt, staff members should consult the appropriate senior member of staff for assistance, as detailed elsewhere in this procedure.

Willow Lodge is committed to supporting vulnerable young people/ service users through its safeguarding agenda in order to prevent potential radicalisation. Willow Lodge at a local operational/service level will attend (where appropriate) at all levels within the Local Authority task groups; Gold, Silver and Bronze.

Willow Lodge has engaged positively with different online trainings to Raise awareness of Prevent as part of wider Safeguarding Training to ensure all staff have the skills and knowledge to refer any concerns appropriately.

APPENDIX B

Example Confidentiality Agreement

Willow Lodge feels that it is important to build trust between you and our staff. It is important that you can be open and feel 'okay' talking to people within the service about yourself and your life.

There may be times when you tell us something that will have to be shared with other staff.

This would happen if:

- You are being hurt by someone
- You need help or support that others will provide

There are also times when we may need to tell people outside of the service. This is because we care about your safety and the safety of others. We might need to tell others:

- If you or someone else are being abused by others
- If you or someone else are being threatened
- If you tell us, you have done or are going to do something that will hurt someone else
- If you need help and support that we cannot provide

If we do have to talk to someone outside of the project, we will tell you first, unless it is an emergency and we need to tell someone straight away.

Your views fears and needs are valued and will be considered. You will be offered support throughout whatever happens.

'I understand my right to confidentiality'

Signed:

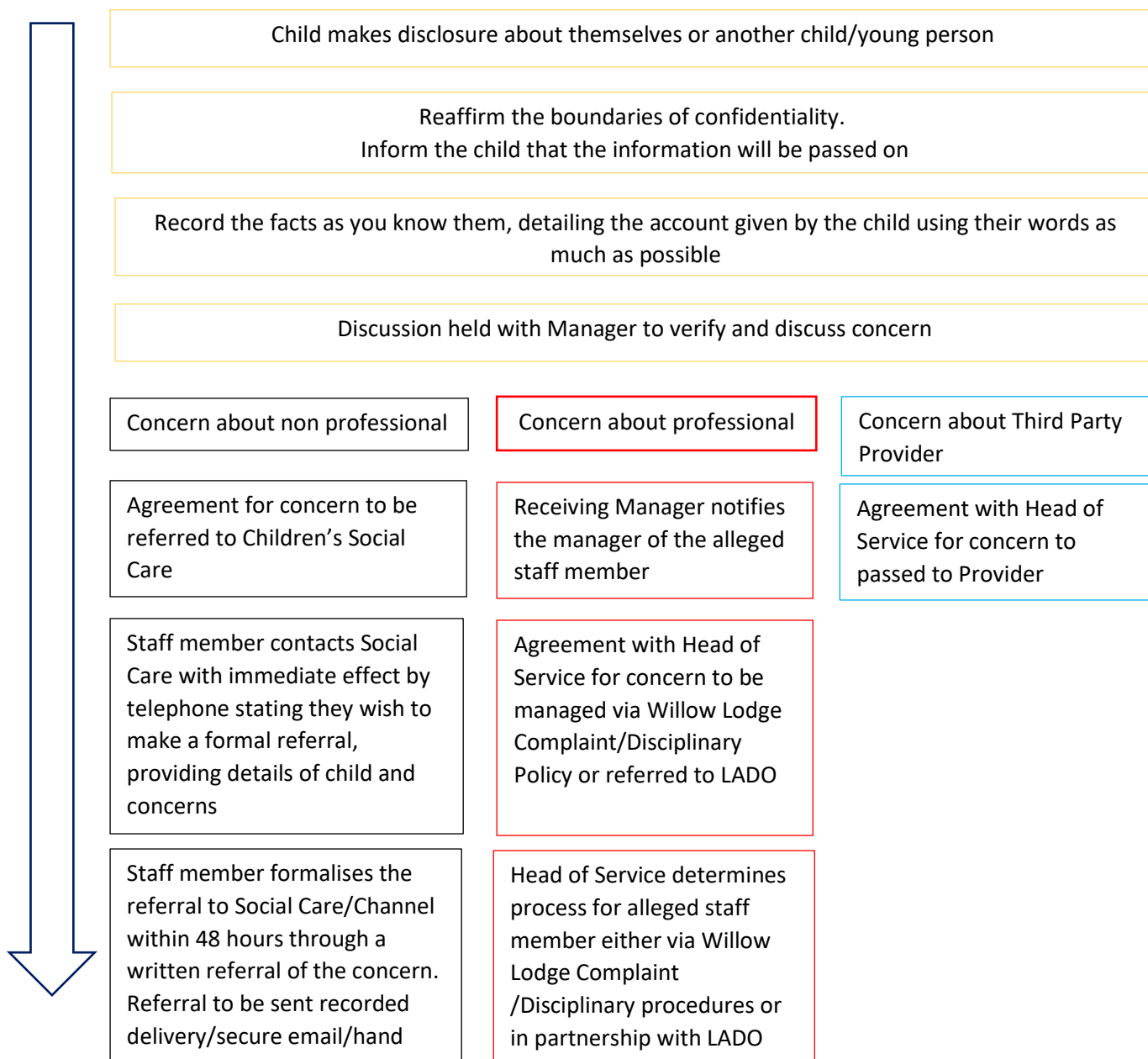
Date:

'I understand my child's right to confidentiality'

Signed:

Date:

Reporting Flowchart



Related policies

Willow Lodge Safeguarding Children and Young Adult Policy must be read in conjunction with the following Willow Lodge policies:

- Bullying and Harassment
- Capability Policy
- Code of Conduct
- Confidentiality
- Data Management and Protection
- DBS Policy
- Disciplinary Procedure
- Data Protection
- Employee Wellbeing
- Equal Opportunity and Diversity
- Health and Safety
- Incident, Accident and Injury
- Reporting Lone Working
- Supervision
- Recruitment and Selection
- Risk Assessment
- Whistleblowing Policy