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| Policy Title: | Safeguarding, child protection, responding to allegations or suspicions of abuse | | |
| Policy Code: | ICP12.3 | | |
| Cross Referencing: | QS 12 Protection of Children Children's Act 1989 Vol. 4 Working Together to Safeguard Children 2018 (Updated Dec 2020) | | |
| Authorised by: | Mark Parker | | |
| Date: | Feb 2021 | Review Date: | Feb 2022 |

1.0 Legislative Framework:

1.1 Impact for Change and all direct and indirect employees have a duty to safeguard young people within their professional and personal capacity. This policy incorporates the legal duty to safeguard and promote the welfare of children and vulnerable people as described in:

- Working Together to Safeguard Children (2018) updated 9th Dec 2020
- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778224/Working_Together_to_Safeguard_Children_2018.pdf
- Children's Homes (England) Regulations (2015) http://www.legislation.gov.uk/ukxi/2015/541/pdfs/ukxi_20150541_en.pdf
- Quality Standards for Children's Homes (2015)
- What to do if you're worried a child is being abused (2015) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
- Procedures laid out by the South West Child Protection Procedures
- <https://www.proceduresonline.com/swcpp/>
- Section 175 of the Education Act 2002;
- Education Act 2011
- Education (Independent School Standards) (England) Regulations (April 2019)
- Education (Non-Maintained Special Schools) (England) Regulations (August 2015)
- Section 10 Children's Act 2004
- DfE Keeping Children Safe in Education 2020 (updated January 2021 Post EU Exit)
- Keeping Children Safe in Education Part 1 Information for all school and college staff (2020)
- Regulated Activity in Relation to children: Scope
- DCSF Safeguarding Disabled Children (2009)
- Directors Board

2.0 Principles:

2.1 This policy sets out the procedures to be taken in respect of children and vulnerable people being cared for by Impact for Change.

- 2.2 Impact for Change is committed to safeguarding and promoting the welfare of children and young people and expects all staff, residential, educational, (including temporary and supply staff), trustee's and volunteers to share this commitment.
- 2.3 The aim of this policy is to safeguard and promote children and vulnerable people's welfare, safety and health by fostering an honest, transparent, caring and supportive climate. The children and vulnerable people's welfare is of paramount importance.
- 2.4 The aim of this policy is to contribute to the wellbeing of the children and vulnerable people by securing their protection from maltreatment, in partnership with parents, key professionals, advocates and other agencies.
- 2.5 Impact for Change provides training to all staff in Safeguarding and Child Protection.

3.0 Definition:

3.1 Safeguarding and promoting the welfare of children and vulnerable people is defined as:

- Protection from maltreatment;
- Preventing impairment of health or development;
- Ensuring that children and vulnerable people grow up in circumstances consistent with the provision of safe and effective care, so as to enable them to fulfil their potential and enter adulthood successfully.

3.2 For the purpose of this policy the following definitions are used (these categories of abuse are neither exhaustive nor mutually exclusive and all may result in a failure of a child to thrive):

3.3 Children:

- Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.

3.4 Safeguarding and Promoting the Welfare of Children:

- 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 life chances.

3.5 Child Protection:

- Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

3.6 Abuse:

- A form of maltreatment of a child. Somebody may abuse or neglect a child 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 others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

3.7 **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.

3.8 **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 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 a 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.

3.9 **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.

3.10 **Neglect:**

- 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); or

- Ensure access to appropriate medical care or treatment.

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

3.11 **Young Carer:**

- A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work).

3.12 **Parent/ Carer:**

- A person aged 18 or over who provides or intends to provide care for a disabled child for whom the person has parental responsibility.

3.13 **Educational, Health and Care Plan:**

- A single plan, which covers the education, health and social care needs of a child or young person with special educational needs and/or a disability (SEND). See the Special Educational Needs and Disability Code of Practice 0-25 (2014).

3.14 **Significant Harm:**

- Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children, and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer significant harm.

4.0 **Main Elements:**

4.1 The main elements of this policy are:

1. Prevention.
2. Protection.
3. Support.
4. Working with Parents.
5. Safer Recruitment.

4.1.1 **Prevention:**

4.1.11 All children and vulnerable people placed at Impact for Change have the right to high standards of protection from harm.

4.1.12 Impact for Care will aim to create an ethos and atmosphere of openness and transparency between employees and young people.

4.1.13 Due to the background and needs of the young people at Impact for Change it may be very difficult for them to communicate allegations of abuse. Therefore staff must be especially vigilant and aware of the categories and indicators of abuse.

- 4.1.14 Employees should be vigilant to the signs and symptoms of abuse and not just rely on a verbal disclosure from a young person. Sometimes young people will *show* the signs and not be able to *say* the abuse. Abuse can be identified through:
- **Disclosing the abuse to someone they have confidence.**
 - **Changes in the young person's behaviour.**
 - **Actual physical signs.**
- 4.1.15 The abuse of children and vulnerable people and particularly the sexual abuse of children and vulnerable people by paedophiles is a complex issue: young people are targeted, groomed, sexualised and seduced by highly sophisticated and oppressive adult behaviour. The victim is often made to feel guilty and responsible by the abuser for responding to his or her advances.
- 4.1.16 Abuse occurs in a range of circumstances. The child or vulnerable person may suffer abuse whilst away from the Home, for example during a visit to the family home, or to friends.
- 4.1.17 Within the Home it is possible that the child/vulnerable person may be abused by a member or members of staff, another young person, carer(s) or visitors.
- 4.1.18 Initially a situation may not seem serious but it should be remembered that prompt help may prevent minor abuse escalating into something more serious. Members of staff must report any suspicions or disclosures of abuse to the delegated safeguarding lead for Impact for Change.
- 4.1.19 The main categories of abuse are (please note these signs and symptoms are not finite or exclusive, staff should use their knowledge of child development and the child);
- **Sexual Abuse:**
 - Being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age
 - Medical problems such as chronic itching, pain in the genitals, venereal diseases
 - Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
 - Personality changes such as becoming insecure or clinging
 - Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
 - Sudden loss of appetite or compulsive eating
 - Being isolated or withdrawn
 - Inability to concentrate
 - Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder
 - Starting to wet again, day or night/nightmares
 - Become worried about clothing being removed
 - Suddenly drawing sexually explicit pictures
 - Trying to be 'ultra-good' or perfect; overreacting to criticism
 - **Emotional Abuse:**
 - Physical, mental and emotional development lags

- Sudden speech disorders
- Continual self-depreciation
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain
- Neurotic behaviour (rocking, hair twisting, self-mutilation)
- Extremes of passivity or aggression
- **Neglect:**
 - Constant hunger
 - Poor personal hygiene
 - Constant tiredness
 - Poor state of clothing
 - Emaciation
 - Untreated medical problems
 - No social relationships
 - Compulsive scavenging
 - Destructive tendencies
- **Physical Abuse:**
 - Unexplained recurrent injuries or burns
 - Improbable excuses or refusal to explain injuries
 - Wearing clothes to cover injuries, even in hot weather
 - Refusal to undress for PE
 - Bald patches
 - Chronic running away
 - Fear of medical help or examination
 - Self-destructive tendencies
 - Aggression towards others
 - Fear of physical contact - shrinking back if touched
 - Fear of suspected abuser being contacted

4.1.20 The assessment of any harm or abuse should be multi - disciplinary and no one professional should take or have the responsibility of determining whether harm has occurred or not. Therefore it is important to discuss any concerns with your line manager immediately.

4.1.21 Radicalisation and Extremism:

Impact for Change values freedom of speech and the expression of beliefs/ ideology as fundamental rights underpinning our society's values. Both young people and staff have the right to speak freely and voice their opinions. However, free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

4.1.22 Impact for Change seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights Movements.

- 4.1.23 Staff will be made aware at safeguarding training of the characteristics within children and families that may indicate radicalisation or warning indicators of those who may be vulnerable to radicalisation.
- 4.1.24 Staff will treat any radicalisation/extremism concerns in the same manner as safeguarding concerns and will follow the homes child protection and safeguarding procedures as outlined in this document.
- 4.1.25 More information can be found in **Appendix Safeguarding Children: The Prevent Duty** [.https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)

4.1.2 Protection:

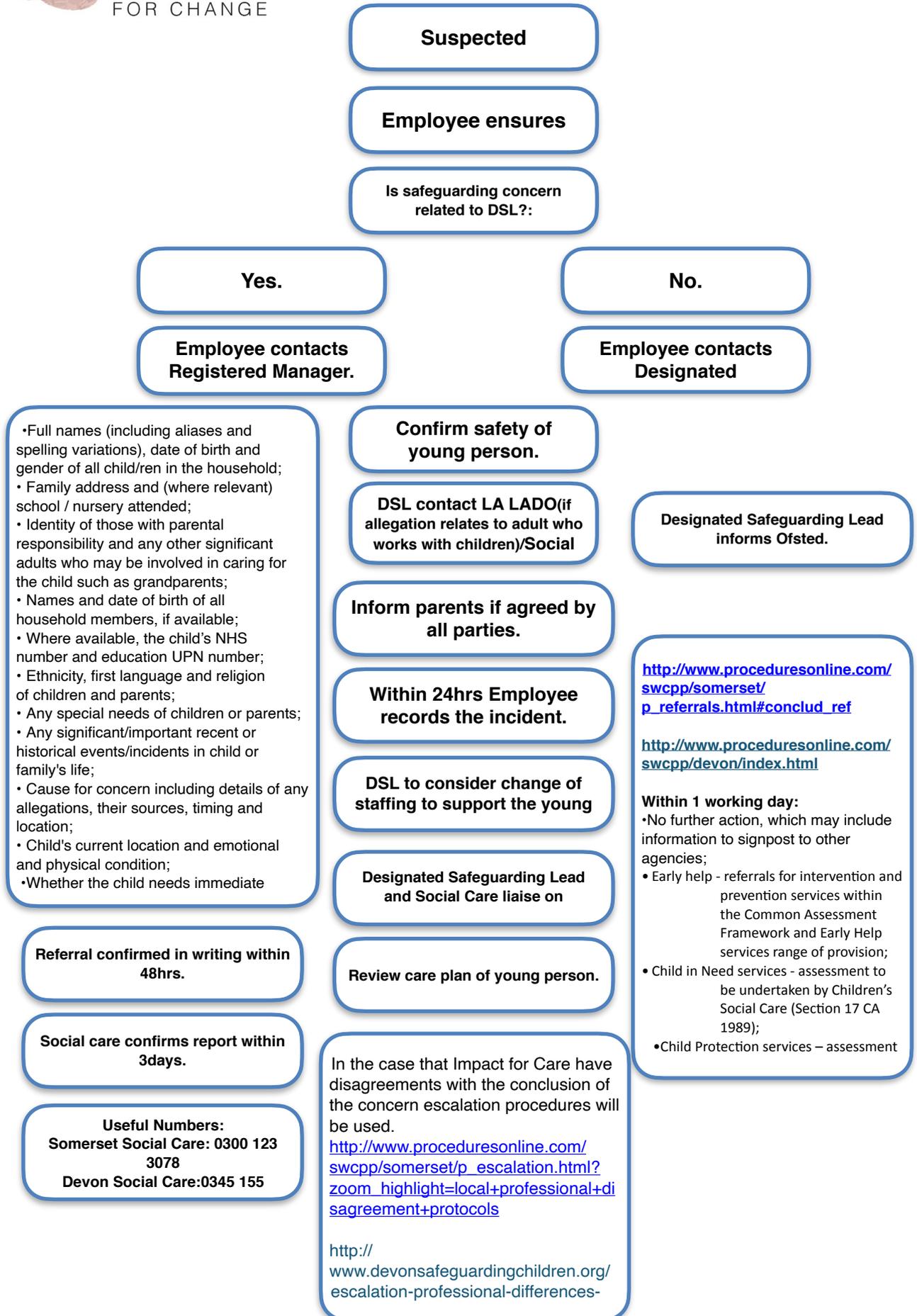
- 4.1.21 Reporting, Referral and Immediate Action:
If a child/vulnerable person alleges abuse or a member of staff has cause to suspect a physical assault, serious intimidation, sexual assault, serious neglect or deprivation that person must immediately refer the matter to the Line Manager/ On Call Designated Person / Designated Safeguarding Lead (DSL).

Contact names and numbers are:

Responsible Individual (Designated Safeguarding Lead):

1. Mark Parker
07842304059
01805 603545
mparker@impactforchange.co.uk

- 4.1.22 Failing to report actual or reasonably suspected physical, sexual or emotional abuse or neglect of a child is a disciplinary offence.
- 4.1.23 The Line Manager / On Call Person will then undertake the following action:

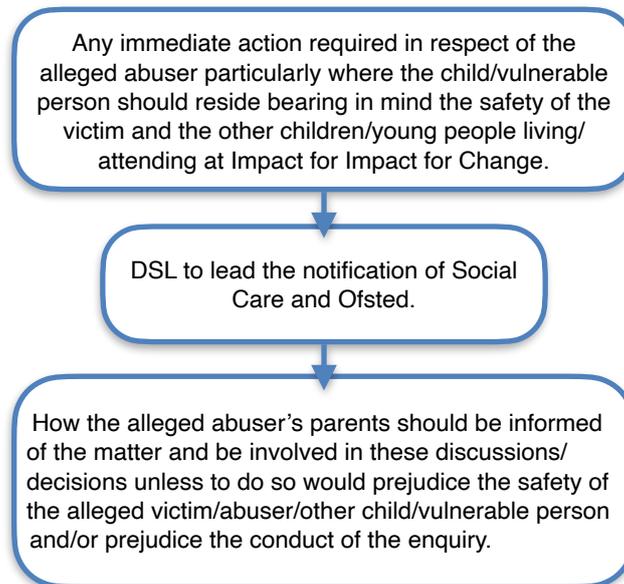


4.1.24 Allegations of abuse by a member of staff of a child or vulnerable person at Impact for Change refer to Managing Allegations policy.

4.1.25 Alleged abuse by a member of staff of a child/vulnerable person not from Impact for Change will result in the alleged member of staff being removed from all Impact for Change operations and prohibited from any Impact for Change properties (direct or indirect).

4.1.26 Abuse by a child/young person

Where the alleged abuser is another child/young person, the Director's / DSL / Designated on call person will agree:



4.1.27 The Mandatory Reporting Duty commenced in October 2015. All staff must report to the police cases where they discover that an act of Female Genital Mutilation (FGM) appears to have been carried out. Staff should discuss any such case with Impact for Change Designated Safeguarding Lead and involve social care as appropriate . Refer to Impact for Change Female Genital Mutilation Policy.

4.1.28 Where the alleged abuser is a visitor to the home, a member of the child's/young person's family or any other person, the matter will be dealt with following the standard procedure outlined previously in this document. Where the alleged abuse is Domestic violence or Domestic Abuse the matter will be dealt with following the standard procedure outlined previously in this document

4.1.30 Support:

4.1.31 Responding to a child/young person who makes an allegation of abuse. If a child/young person say or in some way indicates that abuse has taken place:

- Listen and take seriously what the child/vulnerable person communicates.
- Record exactly what and how the child/vulnerable person communicates.
- Do not express disbelief, however incredible the story appears.

- Do not make any suggestions about what has taken place or how it came about, or question/vulnerable person the child except to clarify what he/she is saying.
- Allow a child/vulnerable person who is freely recalling significant events to continue but do not press for detail beyond what is minimally necessary to be clear that some form of abuse is being described.
- Do not ask a child/vulnerable person to repeat what has been communicated to anyone else before referring.
- Be calm and reassuring: this can be achieved in a number of ways, depending on the child's/vulnerable person(s) needs and stage of development.
- Don't make assumptions about the child's/vulnerable person's feelings.
- Avoid condemning the alleged abuser but do reassure the child/vulnerable person that he/she is not responsible for anything that may have happened despite what he/she may have been told.
- If appropriate communicate to the child/young person that these things have happened to other children/vulnerable
- Do not promise to keep the information secret. Make it clear that you will have to refer the matter on and to whom.
- Communicate to the child/vulnerable person that there are people who can help.
- Do not assume that parents/carers are not involved in or party to the abuse.
- Write down what has been communicated immediately afterwards, describing the specific ways in which the information was communicated and what you said in response. Separate what has been actually been communicated from the interpretation you place on it.

4.1.31 The individual Placement Plan of any child/vulnerable person being placed at, who has been subjected to significant harm, will reflect their individual specific needs.

4.1.32 Impact for Change recognise that children/vulnerable people who have been abused or witnessed violence may have poor self-esteem or sense of worth and we will therefore offer appropriate support.

4.1.40 Working with Families:

4.1.41 Impact for Care believe that working in partnership with parents/carers/social worker is vital to the safeguarding and protection of children/young people. It is also key to the success of the child's/young person's stay at Impact for Change.

4.1.42 Parents/Carers/social workers are issued with a "Parent's Guide to Impact for Change". This includes details of the Safeguarding Policy as well as guidance on complaints and how to raise an issue. The guide allows parents to know key people and their area of responsibility within Impact for Change.

4.1.43 Child Protection information must be transferred as soon as possible to a young person's new placement in agreement with the placing local authority, but kept separately from their main file. Parental consent is not required to transfer this data, since it is held to prevent harm to a child.



4.1.50 Safer Recruitment:

4.1.51 Impact for Change will aim to ensure that all staff, including voluntary staff, are vetted in accordance with:

- The Children's Homes (England) Regulations (2015)
- Quality Standards for Children's Homes (2015) In accordance with Statutory Safeguarding Regulations, any offer of employment will be subject to references, enhanced Disclosure and Barring Service (DBS) Disclosure, Overseas police check (if required) and documentary proof of qualifications.
- DfE Keeping Children Safe in Education (2015)

4.1.52 Any offer of employment (and continued employment) will be conditional on these being satisfactory to Impact for Change procedures.

4.1.53 Refer to Safer Recruitment Policy.

ANY SUSPICION OR CONCERNS RELATING TO THE SAFEGUARDING OF CHILDREN MUST BE REPORTED AS A MATTER OF URGENCY REGARDLESS OF THE TIME OF DAY OR NIGHT



Company Number
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