

**Child Protection and Safeguarding Policy**

Last Update: November 2023

***ME, YOU & US***

***Safeguarding is everyone’s responsibility***

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| Policy reviewed | 16.11.23, agreed by Trustees 14.12.23 |
| Next review date | November 2024 |

 Key Personnel

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| --- | --- | --- | --- |
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*\*Out of hours contact details will be made available to staff*

*\*\*Any changes to key personnel/holiday/emergency contacts will be shared with the appropriate agencies and LA safeguarding boards/hubs*

*Disclaimer: Devon Education Services (DES) makes every effort to ensure that the information in this document is accurate and up to date. If errors are brought to our attention, we will correct them as soon as practicable. Nevertheless, DES and its employees cannot accept responsibility for any loss, damage or inconvenience caused as a result of reliance on any content in this publication.*

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Child Protection and Safeguarding Policy

1. **Safeguarding Statement**

The Hollow Lane Club recognise our moral and statutory responsibility to safeguard and promote the welfare of all users and expects all staff, trustees, and volunteers to share this commitment. We recognise that all children, regardless of age, disability, SEND, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse. We endeavour to provide a safe and welcoming environment where children/young people are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children/young people receive effective support, protection, and justice. We listen to our users and take seriously what they tell us, children/young people are aware of the adults they can talk to if they have a concern. When there are concerns for a child/young person’s welfare, we may need to share information and work in partnership with other agencies. We will ensure concerns are discussed with parents/carers first unless we have reason to believe that by doing so would be contrary to the child/young person’s welfare. This Child Protection and Safeguarding policy underpins and guides our safeguarding procedures and protocols.

1. **Terminology**

Safeguarding and promoting the welfare of children is defined as:

* protecting children from maltreatment,
* preventing impairment of children's mental and physical health or development,
* ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
* taking action to enable all children to have the best outcomes.

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific child/young person who are suffering, or are likely to suffer, significant harm.

Staff refers to all those working for or on behalf of the Club, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Child/young person includes everyone under the age of 18 or 25 if a care leaver.

Parents refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers, adoptive parents and LA corporate parents.

1. **Safeguarding Legislation and Guidance**

The following safeguarding legislation and guidance has been considered when drafting this policy:

* [Education Act 2002 Section 175 (maintained Clubs only)](https://www.legislation.gov.uk/ukpga/2002/32/contents)
* [Education Act 2002 Section 157 (Independent Clubs incl Academies and CTC's)](https://www.legislation.gov.uk/ukpga/2002/32/section/157/enacted)
* [The Education (Independent Club Standards) (England) Regulations 2003](https://www.legislation.gov.uk/uksi/2003/1910/contents/made)
* [The Safeguarding Vulnerable Groups Act 2006](https://www.legislation.gov.uk/ukpga/2006/47/contents)
* [Teachers’ Standards (Guidance for Club leaders, Club staff and governing bodies)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040274/Teachers__Standards_Dec_2021.pdf)
* [Working Together to Safeguarding Children](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2)
* [Keeping Children Safe in Education](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2)
* [Information Sharing 2018](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf)
* [What to do if you’re worried a child/young person is being abused](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)
* [Filtering and monitoring standards in Clubs and colleges (DfE)](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges)

 **4. Policy Principles, Aims and Values**

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| The welfare of the child/young person is paramount: |
| * All children/young people regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
* We recognise that all adults, including temporary staff[[1]](#footnote-1), volunteers and trustees, all have a duty to protect our users from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child/young person/young person is at risk of harm.
* All staff believe that our Club should provide a caring, positive, safe and stimulating environment that promotes the social, physical, mental wellbeing and moral development of the individual child/young person/young person.
* Users and staff involved in child protection issues will receive appropriate support and supervision.
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| This policy aims to: |
| * Raise the awareness of all staff of the need to safeguard children/young people.
* Provide all staff with guidance on the procedures they should adopt in the event that they suspect a child, young person may be experiencing, or be at risk of experiencing, harm. Including (by DSL/DDSL) consideration to the use of appropriate assessments, resources and agency support.
* Provide an environment in which children and young people feel safe, secure, valued, and respected, and that they will be listened to should they make a disclosure.
* Raise awareness that abuse can be both Familial and/or Contextual; and abusers can be both adult/s to child/young person or child/young person to child/young person.
* Demonstrate the Club’s commitment with regard to safeguarding and child/young person protection to users, parents/carers and other partners.
* Provide a systematic means of monitoring children/young person known or thought to be at risk of harm.
* To emphasise the need for high levels of communication between staff and the designated safeguarding leads internally and with external agencies and partners, including our contribution to assessments, referrals, and support plans.
* To develop and promote effective working relationships with other partnership agencies, particularly Children’s Social Care, Police and Health.
* Support the child/young person’s development in ways that will foster security, confidence, and independence.
* Ensure that all staff working within our Club who have substantial access to children/young people have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance)[[2]](#footnote-2), and a single central record is kept for audit.
* Provide clarity and expectations on professional behaviours and code of conduct including lone working requirements.
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| Supporting and Protecting Children/Young People: |
| * We recognise that a child/young person who is abused or witnesses’ violence may feel helpless and humiliated and could experience barriers to making a disclosure. We understand that the behaviour of a child//young person in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn as well as exhibiting signs of mental health problems. We understand the impact on a child/young person’s mental health, behaviour, and education from familial and/or contextual abuse. Club may not only provide stability in the lives of children and young people who have been abused or who are at risk of harm, but it plays a significant part in the prevention of harm to our children/young person.
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| Our Club will support all children and young people by: |
| * encouraging self-esteem and self-assertiveness, through the activities as well as our relationships, whilst not condoning aggression or bullying (incl. cyber bullying).
* promoting a caring, safe, and positive environment within the Club and providing children/young people with good lines of communication with trusted adults, supportive friends and an ethos of protection.
* responding sympathetically to any requests for time out to deal with distress and anxiety.
* offering details of helplines, counselling, or other avenues of external support.
* liaising and working together with all other settings, support services and those agencies involved in the safeguarding of children/young people.
* notifying Children’s Social Care as soon as there is a significant concern.
* ensuring appropriate information is shared confidentially at key transition points in a child/young person’s journey to ensure continues support (incl. Club medical records).
* by accessing and utilising the necessary resources, guidance and toolkits to support the identification of children/young people requiring mental health support, support services and assessments
* reassuring victims that they are being taken seriously and that they will be supported and kept safe.
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| The Club community will protect children and young people by: |
| * work to establish and maintain an ethos where children/young people feel secure, are encouraged to talk and are always listened to.
* ensure that all children/young people know there are adults in the Club whom they can approach if they are worried or in difficulty.
* include regular consultation with children/young people, parents and staff, gathering their voice.
* including safeguarding across the curriculum to equip children/young/people with the skills they need to stay safe from harm and to know to whom they should turn for help; in particular this will include anti-bullying work, information about child/young person on child/young person abuse (sexual harassment and sexual violence, consent), online-safety, road safety, pedestrian and cycle training; provide focussed activities to prepare key year groups for transition to new settings
* ensure all staff, users and parents are aware of club guidance for their use of mobile technology and the safeguarding issues around the use of mobile technologies, including the use of social media and their associated risks have been shared.
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 **5. Safe Club, Safe Staff**

We will ensure that staff, Trustees, Club and parents:

We will follow the statutory guidance as set out in the latest Keeping Children Safe in Education (and associated documents and guidance), adhering to the roles, responsibilities and expectations identified for:

 **6. Roles and Responsibilities**

* Trustee boards, proprietors and management committees.
* The General Manager
* The designated safeguarding lead
* The deputy designated safeguarding lead/s
* Staff

[Keeping Children Safe in Education](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2)

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| Trustee boards, proprietors and management committees:All members of The Trustee Board understand and fulfil their responsibilities, namely, to ensure that there is a Child Protection and Safeguarding policy together with a Staff Behaviour policy (Code of Conduct).Trustee boards and proprietors should ensure that all trustees receive appropriate safeguarding and child/young person protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in Clubs and colleges are effective and support the delivery of a robust whole Club approach to safeguarding. Their training should be regularly updated. |
| Roles and responsibilities will include:* Child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with the Local Authority and statutory requirements, are reviewed annually and that the Child Protection and Safeguarding policy is publicly available on the club website or by other means.
* Ensures that all staff including temporary staff and volunteers are provided with the Club’s Child/young person Protection and Safeguarding policy and staff Code of Conduct.
* All staff have read Keeping Children Safe in Education Part 1\* and Annex B and those mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance. (\* or Annex A if not working directly with children)
* The Club operates a safer recruitment procedure that includes statutory checks on staff, disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training.
* The Club has procedures for dealing with allegations of abuse against staff (including the General Manager), supply staff, volunteers and against other children/young people and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned.
* A member of the Trustee Board, usually the Chair, is nominated to liaise with the Local Authority on Child Protection issues and in the event of an allegation of abuse made against the General Manager.
* A member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) by the Trustee Board who will take lead responsibility.
* On appointment, the DSL and deputy(ies) undertake appropriate Level 3 identified training offered by the Local Authority or other provider every two years.
* All other staff have safeguarding training updated as appropriate; but at least annually.
* At least one member of the Trustee Board has completed safer recruitment training to be refreshed at least every five years.
* Appropriate safeguarding responses are in place for children who do not arrive for a booked session.
* Appropriate online filtering and monitoring systems are in place.
* Enhanced DBS checks at the appropriate level are in place for all Trustees.
* Any weaknesses in Child Protection are remedied immediately.
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| The General Manager:The General Manager will support Trustee Board, designated safeguarding lead, deputies, staff and volunteers to fulfil their roles and responsibilities |
| Roles and responsibilities will include:* Ensuring the Child Protection and Safeguarding policy and procedures are implemented and followed by all staff
* Enabling sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputy(ies) DSL(s) to carry out their roles effectively,
* Supporting and promoting a safeguarding culture and ethos at the Club so that children/young people’s wishes and feelings are taken into account when determining what action to take and what services to provide.
* Ensuring systems are in place for children/young people to express their views and give feedback.
* Following the whistleblowing policy and procedures if an allegation is made against a member of staff supply staff or volunteer all staff, including liaising with the Local Authority Designated Officer (LADO) and referring anyone who has harmed or may pose a risk to a child/young person/young person to the Disclosure and Barring Service.
* That users are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
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| The Designated Safeguarding Lead (DSL): The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder’s job description. |
| Roles and responsibilities will include:* Availability – being available during Club hours
* Manage referrals – to e.g. Children’s Social Care, Channel programme, Disclosure and Barring service, the Police
* Working with others – e.g. a point of contact with safeguarding partners, a source of support and advice for staff, to promote supportive engagement with parents and/or carers and the SLT/Trustee Board.
* Information sharing and managing the child/young person protection files
* Raising Safeguarding and Child Protection Awareness
* Updating training, knowledge and skills required to carry out the role of DSL
* Providing support to staff
* Holding and sharing information
* Overseeing and acting upon filtering and monitoring reports and checks to these systems
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| The Deputy Designated Safeguarding Lead/s (DDSL):Is/ are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of users. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated. |

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| Staff: |
| Roles and responsibilities will include:* maintaining an attitude of ‘it could happen here’ where safeguarding is concerned.
* identifying concerns early, provide help for children and young people, promote children/young people’s welfare and prevent concerns from escalating.
* to provide a safe environment in which children/young people can participate.
* knowing what to do if a child/young person/young person tells them they are being abused, exploited, or neglected.
* being able to reassure victims that they are being taken seriously and that they will be supported and kept safe.
* recognising the barriers for children/young people when wanting to make a disclosure (verbal or non-verbal)
* identifying children/young people who may benefit from early help, (providing support as soon as a problem emerges) and the part they play in these support plans.
* raising any concerns for a child/young person/young person following the Club’s safeguarding policies and procedures
* being aware of local authority referral processes and supporting social workers and other agencies following any referral.
* Being aware of systems within Club which support safeguarding e.g. safeguarding policy, behaviour policy, code of conduct, CME, online filtering, and monitoring
* Attending regular safeguarding and child protection training.
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 **7. Confidentiality**

* Our Club recognises that in order to effectively meet a child/young person’s needs, safeguard their welfare and protect them from harm the Club must contribute to inter-agency working in line with Working Together to Safeguard Children (2018) and share information between professionals and agencies where there are concerns.
* All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children/young person and that the Data Protection Act 2018[[3]](#footnote-3) is not a barrier to sharing information where the failure to do so would place a child/young person at risk of harm.
* All staff must be aware that they cannot promise a child/young person to keep secrets which might compromise the child/young person’s safety or wellbeing.
* However, we also recognise that all matters relating to child protection are personal to child/young people and families. Therefore, in this respect they are confidential and the General Manager or DSLs will only disclose information about a child/young person to other members of staff on a need-to-know basis.
* We will always undertake to share our intention to refer a child/young person to the Local Authority Safeguarding Hub with their parents /carers unless to do so could put the child/young person at greater risk of harm or impede a criminal investigation. If in doubt, we will contact the Local Authority Safeguarding Hub consultation line.
* In line with KCSiE all safeguarding files will be kept confidential and stored securely. Safeguarding files will be kept separate.

 8. **Recognising and Responding to Safeguarding Concerns**

**Recognising:**

Any child/young person, in any family, in any Club, could become a victim of abuse. Staff should always maintain an attitude of **“It could happen here”.** We also recognise that abuse, neglect and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

* Abuse and neglect are forms of maltreatment of a child/young person. Somebody may abuse or neglect a child/young person by inflicting harm or by failing to act to prevent harm. Children/young people may be abused in the family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child/young person or child/young person.
* Abuse and Neglect may also take place outside of the home, contextual safeguarding, and this may include (but not limited to), sexual exploitation criminal exploitation, serious youth violence, radicalisation.
* Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting put children/young people in danger and that safeguarding issues can manifest themselves via child on-on-child person abuse.

Further information about the four categories of abuse; physical, emotional, sexual and neglect, (familial and contextual) and indicators that a child/young person/young person may be being abused can be found in appendices 1 - 17 and in Keeping Children Safe in Education Part 1/Annex A/Annex B. There are also a number of specific safeguarding concerns that we recognise our users may experience.

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| * + child/young person missing or absent from education
	+ child/young person missing from home or care
	+ child/young person sexual exploitation (CSE), child/young person criminal exploitation (CCE)
	+ bullying including cyberbullying
	+ domestic abuse
	+ drugs
	+ fabricated or induced illness
	+ faith abuse
	+ female genital mutilation (FGM)
	+ forced marriage
	+ gangs and youth violence
 | * + gender-based violence/violence against women and girls (VAWG)
	+ mental health difficulties
	+ private fostering
	+ radicalisation
	+ youth produced sexual imagery (sexting)
	+ teenage relationship abuse
	+ trafficking
	+ child/young person on child/young person abuse
	+ upskirting
	+ serious violence
	+ sexual harassment
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* There will be occasions when staff may suspect that a user may be at risk but have no ‘real’ evidence. The user’s behaviour may have changed, their artwork could be bizarre, and they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed.
* We recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. However, they may also indicate a child/young person/young person is being abused or is in need of safeguarding.
* In these circumstances staff will try to give the child/young person the opportunity to talk. It is fine for staff to ask the user if they are OK or if they can help in any way.

Further information on the different types of safeguarding concerns and Clubs’ response can be found in the Appendices section –

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**Responding:**

* Following an initial conversation with the user, if the member of staff remains concerned, they should discuss their concerns with the DSL and put them in writing, see FLOW CHART A. Records should include:

• a clear and comprehensive summary of the concern.

• details of how the concern was followed up and resolved.

• a note of any action taken, decisions reached and the outcome.

* If the user does begin to reveal that they are being harmed, staff should follow the advice in FLOW CHART A and in the table below ‘pupil making a disclosure’.
* All concerns however small must be recorded and shared with the DSL as this information could provide the ‘missing’ piece of the bigger picture of the lived experience for the child/young person/young person.

***FLOW CHART A***

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| If a user discloses to a member of staff |
| * We recognise that it takes a lot of courage for a child/young person to disclose they are being abused. They may feel ashamed, guilty or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.
* A child/young person/young person who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.
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| During their conversation with the user staff will; |
| * listen to what the child/young person has to say and allow them to speak freely.
* remain calm and not overact or act shocked or disgusted – the user may stop talking if they feel they are upsetting the listener.
* reassure the child/young person that it is not their fault and that they have done the right thing in telling someone.
* not be afraid of silences – staff must remember how difficult it is for the user and allow them time to talk.
* take what the child/young person is disclosing seriously.
* ask open questions and avoid asking leading questions.
* avoid jumping to conclusions, speculation or make accusations.
* not automatically offer any physical touch as comfort. It may be anything but comforting to a child/young person who is being abused.
* avoid admonishing the child/young person for not disclosing sooner. Saying things such as ‘I do wish you had told me about it when it started’ may be the staff member’s way of being supportive but may be interpreted by the child/young person to mean they have done something wrong.
* tell the child/young person what will happen next, that they cannot keep secrets and that information will be shared to ensure the right level of support is given.
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| Notifying Parents/Carers |
| * The Club will normally seek to discuss any concerns about a user with their parents/carers. This must be handled sensitively and normally the DSL/DDSL will make contact with the parent/carer in the event of a concern, suspicion or disclosure of abuse of that the child/young person has been harmed in some way.
* However, if the Club believes that notifying parents/carers could increase the risk to the child/young person/young person or exacerbate the problem, advice will first be sought from children’s Local Authority Safeguarding Hub e.g. familial sexual abuse.
* Where there are concerns about forced marriage or honour-based abuse parents/carers should not be informed a referral is being made as to do so may place the child/young person at a significantly increased risk. In some circumstances it would be appropriate to contact the police.
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| Making a referral |
| * Concerns about a child/young person or a disclosure should be immediately raised with the DSL who will help decide whether a referral to children’s Local Authority Safeguarding Hub or other support is appropriate in accordance with The Local Authority Threshold Tool[[4]](#footnote-4).
* If Club are uncertain about whether a concern raised should be referred to the Local Authority Safeguarding Hub, a consultation will be sought with the Local Authority to seek further support and guidance.
* If a referral is needed, the DSL should make this rapidly and have the necessary systems in place to enable this to happen. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn’t been made, they can, and should, consider making a referral themselves.
* The child/young person (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child/young person/young person.
* If after a referral the child/young person’s situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child/young person/young person’s situation improves.
* If a child/young person is in immediate danger or is at risk of harm a referral should be made to children’s Local Authority Safeguarding Hub and/or the police immediately. Anybody can make a referral.
* Where referrals are not made by the DSL, the DSL should be informed as soon as possible.
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| Supporting our Staff |
| * We recognise that staff working in the Club who have become involved with a child/young person/young person who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.
* We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.
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 **9. Children/young people who are particularly vulnerable**

The Hollow Lane Club recognises that some children/young people are more vulnerable to abuse, neglect and contextual safeguarding concerns and that additional barriers exist when recognising abuse for some children/young people. We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children/young people’s diverse circumstances, rather than the individual child/young person’s personality, impairment, or circumstances.

In some cases possible indicators of abuse such as a child/young person’s mood, behaviour or injury might be assumed to relate to the child/young person/young person’s impairment or disability rather than giving a cause for concern. Or a focus may be on the child/young person/young person’s disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child/young person/young person may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children/young people may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

|  |
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| Any child/young person/young person may benefit from early help, but all Club staff should be particularly alert to the potential need for early help for a child/young person/young person who: |
| * is disabled and has specific additional needs.
* has special educational needs (whether or not they have a statutory education, health and care plan).
* is a young carer.
* is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
* is frequently missing/goes missing from care or from home.
* is misusing drugs or alcohol themselves.
* is at risk of modern slavery, trafficking or exploitation.
* is in a family circumstance presenting challenges for the child/young person, such as substance abuse, adult mental health problems or domestic abuse.
* has returned home to their family from care.
* is showing early signs of abuse and/or neglect.
* is at risk of being radicalised or exploited.
* is a privately fostered child/young person.
* has an imprisoned parent.
* is experiencing mental health, wellbeing difficulties.
* is persistently absent from education (including persistently absent for part of the Club day).
* is at risk of ‘honour’ based abuse such as FGM or Forced Marriage
 |

 **10. Whistleblowing**

We recognise that children/young people cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child/young person protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the Club’s safeguarding arrangements. If it becomes necessary to consult outside the Club, they should speak in the first instance, to the LADO following the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child/young person protection failures internally. Staff can call: 0800 028 0285 line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

Whistleblowing re the General Manager should be made to the Chair of Trustees whose contact details are readily available to staff (as pertinent to setting).

 **11. Allegations against staff**

All Club staff should take care not to place themselves in a vulnerable position with a child/young person/young person. It is always advisable for interviews or work with individual children/young people or parents/carers to be conducted in view of other adults. Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction[[5]](#footnote-5).

In line with KCSiE part 4 guidelines,

Suspension of the member of staff, excluding the General Manager, against whom an allegation has been made, needs careful consideration, and the General Manager will seek the advice of the LADO and an HR Consultant in making this decision.

Staff, parents/carers and Trustees are reminded that publication of material that may lead to the identification of a staff member who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

 **12. Physical Intervention**

We acknowledge that staff must only ever use physical intervention as a last resort, when a child/young person/young person is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

Such events should be recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained.

We understand that physical intervention of a nature which causes injury or distress to a child/young person/young person may be considered under child/young person protection or disciplinary procedures.

We recognise that touch is appropriate in the context or working with children/young people, and all staff have been given ‘Safe Practice’ guidance to ensure they are clear about their professional boundary.

 **13. Confidentiality, Sharing Information and GDPR**

All staff will understand that child/young person protection issues warrant a high level of confidentiality, not only out of respect for the user and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should be proactive in sharing as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children/young people, whether this is when problems are first emerging, or where a child/young person is already known to local authority children’s social care.

Staff should only discuss concerns with the DSL, General Manager or chair of Trustees (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a ‘need-to-know’ basis.

However, following a number of cases where senior leaders at Club had failed to act upon concerns raised by staff, Keeping Children Safe in Education emphasises that any member of staff can contact children’s social care if they are concerned about a child/young person/young person.

Child/young person protection information will be stored and handled in line with the Data Protection Act 2018 [[6]](#footnote-6) and HM Government Information Sharing and Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018. Club will consider where appropriate information sharing prior to the child/young person/young person’s formal transfer to their new setting, this could also include key staff from their new setting to be invited to meetings e.g. Child/young person Protection, Core group or Team Around a Family (with consent of parents and professionals).

At the point a child/young person/young person formally transfers to their new setting, their safeguarding file will be transferred securely in line with GDPR expectations as soon as possible but within 5 working days.

|  |
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| Information sharing is guided by the following principles:  |
| * necessary and proportionate
* relevant
* adequate
* accurate
* timely
* secure
 |

Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children/young people.

The Hollow Lane Club will ensure that images of children/young people used within publications, publicity and on the website has written parental consent prior to any images being taken and used. This consent will be obtained in line with Club’s annual data collection process.

 **14. Policy Links**

This policy also links to our policies on:

|  |  |
| --- | --- |
| * Behaviour
* Staff Behaviour Policy / Code of Conduct
* Whistleblowing
* Anti-bullying
* Health & Safety
* Allegations against staff
* Parental concerns
* Attendance
* Curriculum
* PSHE
* Teaching and Learning
 | * Administration of medicines
* Drug Education
* Relationships and Sex Education
* Physical intervention
* Online Safety, including staff use of mobile phones
* Risk Assessment
* Recruitment and Selection
* Child/young person Sexual Exploitation
* Intimate Care
* Radicalisation and Extremism
* Data Protection/GDPR Guidance
 |

**Appendix**

 **1. Categories of Abuse**

**Categories of Abuse:**

* Physical Abuse
* Emotional Abuse (including Domestic Abuse)
* Sexual Abuse (including child/young person sexual exploitation)
* Neglect

**Signs of Abuse in Children:**

The following non-specific signs may indicate something is wrong:

* Significant change in behaviour
* Extreme anger or sadness
* Aggressive and attention-needing behaviour
* Suspicious bruises with unsatisfactory explanations
* Lack of self-esteem
* Self-injury
* Depression and/or anxiousness
* Age-inappropriate sexual behaviour
* Child/young person Sexual Exploitation
* Criminality
* Substance abuse
* Mental health problems
* Poor attendance

**Risk Indicators**

The factors described in this section are frequently found in cases of child/young person abuse. Their presence is not proof that abuse has occurred, but:

* Must be regarded as indicators of the possibility of significant harm
* Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
* May require consultation with and / or referral to Children’s Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child/young person may:

* Appear frightened of the parent/s
* Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

* Persistently avoid child/young person health promotion services and treatment of the child/young person’s episodic illnesses
* Have unrealistic expectations of the child/young person
* Frequently complain about/to the child/young person and may fail to provide attention or praise (high criticism/low warmth environment)
* Be absent or misusing substances
* Persistently refuse to allow access on home visits
* Be involved in domestic abuse

Staff should be aware of the potential risk to child/young person when individuals, previously known or suspected to have abused child/young person, move into the household.

**Recognising Physical Abuse**

The following are often regarded as indicators of concern:

* An explanation which is inconsistent with an injury
* Several different explanations provided for an injury
* Unexplained delay in seeking treatment
* The parents/carers are uninterested or undisturbed by an accident or injury
* Parents are absent without good reason when their child/young person is presented for treatment
* Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
* Family use of different doctors and A&E departments
* Reluctance to give information or mention previous injuries

**Bruising**

Children/young people can have accidental bruising, but the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

* Any bruising to a pre-crawling or pre-walking baby
* Bruising in or around the mouth, particularly in small babies which may indicate force feeding
* Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
* Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
* Variation in colour possibly indicating injuries caused at different times
* The outline of an object used e.g. belt marks, handprints or a hairbrush
* Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
* Bruising around the face
* Grasp marks on small child
* Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Mongolian Blue Spot: Bruising in non-mobile child/young person is rare and may indicate abuse or neglect. Birth marks, especially Mongolian Blue Spots, can mimic bruising. Mongolian Blue Spot can be identified (see below), however if in any doubt as to the cause of the bruise refer to [Southwest Child/young person Protection Procedures (proceduresonline.com)](https://www.proceduresonline.com/swcpp/) local authority guidance and consultation.

* Areas of skin hyperpigmentation – flat, not raised, swollen or inflamed
* Not painful to touch
* Usually present at birth/ develop soon afterwards
* Will not change in shape or colour within a few days
* Normally uniform blue/ grey in colour across the mark
* Common in African, Middle Eastern, Mediterranean and Asian children
* While most occur at the lower back and buttocks, they can appear anywhere (e.g. back of shoulder or limb). Scalp/ face rarely affected
* Can be single/ multiple, vary in size, but mostly few centimetres diameter
* Gradually fade over many year

**Bite Marks**

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child/young person.

A medical opinion should be sought where there is any doubt over the origin of the bite.

**Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

* Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
* Linear burns from hot metal rods or electrical fire elements
* Burns of uniform depth over a large area
* Scalds that have a line indicating immersion or poured liquid (a child/young person getting into hot water is his/her own accord will struggle to get out and cause splash marks)
* Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child/young person, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

**Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

* The history provided is vague, non-existent or inconsistent with the fracture type
* There are associated old fractures
* Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
* There is an unexplained fracture in the first year of life

**Scars**

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

**Recognising Emotional Abuse**

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

* Developmental delay
* Abnormal attachment between a child/young person and parent/carer e.g. anxious, indiscriminate or not attachment
* Indiscriminate attachment or failure to attach
* Aggressive behaviour towards others
* Scapegoated within the family
* Frozen watchfulness, particularly in pre-Club children
* Low self-esteem and lack of confidence
* Withdrawn or seen as a “loner” – difficulty relating to others

**Recognising Signs of Sexual Abuse**

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child/young person to talk about, and full account should be taken of the cultural sensitivities of any individual child/young person/family.

Recognition can be difficult, unless the child/young person discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

* Inappropriate sexualised conduct
* Sexually explicit behaviour, play or conversation, inappropriate to the child/young person’s age
* Continual and inappropriate or excessive masturbation
* Self-harm (including eating disorder), self-mutilation and suicide attempts
* Involvement in prostitution or indiscriminate choice of sexual partners
* An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

* Pain or itching of genital area
* Blood on underclothes
* Pregnancy in a younger girl where the identity of the father is not disclosed
* Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

**Recognising Neglect**

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

* Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
* A child/young person seen to be listless, apathetic and irresponsive with no apparent medical cause
* Failure of child/young person to grow within normal expected pattern, with accompanying weight loss
* Child/young person thrives away from home environment
* Child/young person frequently absent from Club
* Child/young person left with adults who are intoxicated or violent
* Child/young person abandoned or left alone for excessive periods

 **2. Anti-Bullying/Cyberbullying**

Our Club policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child/young person protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that children/young people with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child/young person abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the General Manager and the DSL will consider implementing child/young person protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education.

 **3. Racist Incidents**

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child/young person protection procedures. We keep a record of racist incidents and report them to the Local Authority.

**4. Radicalisation and Extremism**

The Prevent Duty for England and Wales (2015) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children’s services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined 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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Some children/young people are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

The Club is clear that exploitation of vulnerable children/young people and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for Clubs and children/young people providers on preventing children/young people and young people from being drawn into terrorism[[7]](#footnote-7).

The Club seeks to protect children/young people 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.

Club staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in the Appendix section.

Opportunities are provided in the curriculum to enable users to discuss issues of religion, ethnicity and culture and the Club follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Clubs (2014)[[8]](#footnote-8).

The Club Trustees, the General and the Designated Safeguarding Lead (DSL) will assess the level of risk within the Club and put actions in place to reduce that risk. Risk assessment may include the use of Club premises by external agencies, anti-bullying policy and other issues specific to the Club’s profile, community and philosophy.

When any member of staff has concerns that a user may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then the Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and trustees to raise concerns around Prevent (020 7340 7264).

**Indicators Of Vulnerability to Radicalisation**

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy 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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.*

1. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
* Encourage, justify or glorify terrorist violence in furtherance of particular beliefs.
* Seek to provoke others to terrorist acts.
* Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
* Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Users may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that Club staff are able to recognise those vulnerabilities.

**Indicators of vulnerability include:**

* Identity Crisis – the user is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
* Personal Crisis – the user may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
* Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
* Unmet Aspirations – the user may have perceptions of injustice; a feeling of failure; rejection of civic life.
* Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
* Special Educational Need – users may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

* Being in contact with extremist recruiters.
* Accessing violent extremist websites, especially those with a social networking element.
* Possessing or accessing violent extremist literature.
* Using extremist narratives and a global ideology to explain personal disadvantage.
* Justifying the use of violence to solve societal issues.
* Joining or seeking to join extremist organisations; and
* Significant changes to appearance and / or behaviour.
* Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Prevent duty ensures Clubs and colleges have ‘due regard’ to the need to prevent people from being draw into terrorism.

Channel is the voluntary, confidential support programme which focuses on providing support at an early stage to individuals that have been identified as being vulnerable to radicalisation. Prevent referrals may be passed to the multi-agency Channel panel to determine whether individuals require support.

[The Prevent Duty can be accessed via this link](https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales). (Club specific para’s 57-76)

[Summary of The Prevent Duty for Clubs and Childcare Providers (June 2015)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)

[The Prevent Duty, for Further Education Institutions](https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales)

Guidance on Channel <https://www.gov.uk/government/publications/channel-guidance>

Further information can be obtained from the Home Office website.

**5. Domestic Abuse (incl Operation Encompass)**

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, and religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.

How does it affect children/young people?

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children/young people can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases children/young people may blame themselves for the abuse or may have had to leave the family home as a result. Children/young people who witness domestic abuse are at risk of significant harm.

What are the signs to look out for?

Child/young people affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child/young person, think about whether domestic abuse may be a factor.

What should I do if I suspect a family is affected by domestic abuse?

Contact: <https://new.devon.gov.uk/dsva/>

**If you are concerned about a child/young person or young person** in Devon please contact the [DCC - Request for support (outsystemsenterprise.com)](https://devoncountycouncil.outsystemsenterprise.com/MASH/homepage) on 0345 155 1071 or email Local Authority Safeguarding Hubsecure@devon.gov.uk.

**If you are concerned about an adult (aged 16+)** in Devon please complete the [Risk Identification Checklist](https://safelives.org.uk/sites/default/files/resources/NI%20Dash%20without%20guidance%20FINAL.pdf) (Safelives DASH RIC) to identify the level of risk which support service to refer them too, and follow the advice on the [MARAC page](https://new.devon.gov.uk/dsva/information-for-professionals/marac/) for all levels of risk.

**If you are concerned about a vulnerable adult** please contact [Care Direct](https://new.devon.gov.uk/devonsafeguardingadultsboard/reporting-concerns) on 0845 155 1007 (8am – 8pm Monday to Friday and 9am – 1pm on Saturdays) In an emergency, please contact the Emergency Duty Service 0845 6000 388 or email csc.caredirect@devon.gov.uk.

[**Splitz Support Service**](https://www.splitz.org/devon.html) is a charity delivering support services to women and young people experiencing the trauma of domestic abuse and sexual violence. Telephone 0345 155 1074 or email admin@splitzdevon.org

[**SAFE (Stop Abuse For Everyone)**](https://www.safe-services.org.uk/) is a charity based in Exeter providing help and support to children and families who have experienced domestic abuse and violence. Telephone 030 30 30 0112 or email hello@safe-services.org.uk (Monday to Friday, 9am – 5pm)

**National Domestic Abuse Helpline** Refuge runs the National Domestic Abuse Helpline, available 24hour a day 0808 2000 247 and its website offers guidance and support for potential victims.

**Refuge:** <https://www.refuge.org.uk/>

**Operation Encompass**

Operation Encompass helps police and Clubs work together to provide emotional and practical help for child/young person. Police will inform the ‘key adult’ within Club if they have been called to an incident of domestic abuse, where there are child/young person in the household before registration the next day.

**6. Exploitation (incl Child/young person Sex Exploitation, Child/young person Criminal Exploitation & County Lines)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child/young person into sexual or criminal activity. This power imbalance could be due to age, gender, sexual identity, cognitive ability, physical strength, status, and /or access to economic or other resources. The abuse could be linked to an exchange for something the victim perceives that they need or want and/or will be to the financial benefit or other advantage (such as increase status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and adults or child/young personren (who themselves may be experiencing exploitation). The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when the activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. The experience of girls who are criminally exploited can be very different from boys, the indicators may not be the same and both boys and girls that are being criminally exploited may be at higher risk of sexual exploitation.

Any concerns that a child/young person/young person is being or is at risk of being sexually or criminally exploited should be passed without delay to the DSL. We aware there is a clear link between regular Club absence, CSE and CCE. Staff should consider a child/young person/young person to be at potential CSE/CCE risk in the case of regular Club absence and make reasonable enquiries with the child/young person/young person and parents/carers to assess this risk.

The DSL will use the appropriate Local Authority Assessment tool e.g. the Exploitation Toolkit, the Devon Children and Families Partnership Adolescent Safety Framework Safer Me Assessment[[9]](#footnote-9) on all occasions when there is a concern that a child/young person is being or is at risk of being sexually or criminally exploited or where indicators have been observed that are consistent with a child/young person who is being or who is at risk of being sexually or criminally exploited. These assessments will indicate to the DSL whether e.g. a Safer Me Early Help approach or referral to the Exploitation Hub/Local Authority Safeguarding Hub is required. If the DSL is in any doubt, they will contact the Safeguarding Hub consultation.

In all cases if the assessment identified any level of concern the DSL should contact their local MACE[[10]](#footnote-10) (Missing and Child/young person Exploitation) and email the completed (e.g. Safer Me) assessment along with a Safeguarding Hub enquiry form. If a child/young person/young person is in immediate danger the police should be called on 999.

Club is aware that a child/young person/young person often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence the child/young person/young person may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

Club includes the risks of sexual and criminal exploitation in activities if appropriate. Users will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE/CCE, including online, and knowing how and where to get help.

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual or criminal exploitation.

Signs include:

* going missing from home or Club
* regular Club absence/truanting
* underage sexual activity
* inappropriate sexual or sexualised behaviour
* sexually risky behaviour, 'swapping' sex
* repeat sexually transmitted infections
* in girls, repeat pregnancy, abortions, miscarriage
* receiving unexplained gifts or gifts from unknown sources
* having multiple mobile phones and worrying about losing contact via mobile
* online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
* having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
* changes in the way they dress
* going to hotels or other unusual locations to meet friends
* seen at known places of concern
* moving around the country, appearing in new towns or cities, not knowing where they are
* getting in/out of different cars driven by unknown adults
* having older boyfriends or girlfriends
* contact with known perpetrators
* involved in abusive relationships, intimidated and fearful of certain people or situations
* hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
* associating with other young people involved in sexual exploitation
* recruiting other young people to exploitative situations
* truancy, exclusion, disengagement with Club, opting out of education altogether
* unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
* mood swings, volatile behaviour, emotional distress
* self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
* drug or alcohol misuse
* getting involved in crime
* police involvement, police records
* involved in gangs, gang fights, gang membership
* injuries from physical assault, physical restraint, sexual assault.

Child/young person Criminal Exploitation can include children/young people being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others

County lines is a term used to describe gangs and organised criminal networks involved in the exporting of illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of ‘deal line.’

Exploitation is an integral part of the county lines offending model with children/young people and vulnerable adults being exploited to move (and store) drugs and money. The same grooming models used to coerce, intimidate and abuse individuals for sexual and criminal exploitation are also used for grooming vulnerable individuals for county lines.

CSE is a form of child/young person sexual abuse. CSE can occur over time or be a one-off occurrence. CSE can affect any child/young person, who has been coerced into engaging in sexual activities. This includes 16and 17-year-olds who can legally consent to have sex.

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

**For further information on signs of a child/young person’s involvement in sexual exploitation:** [Child/young person sexual exploitation: guide for practitioners](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

**For further information on County Lines:** [Criminal exploitation of children and vulnerable adults: county lines guidance](https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines)

**7. Female Genital Mutilation (FGM)**

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, the member of staff must report this to the Police.

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child/young person abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Section 5B of the 2003 Act1 introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report ‘known’ cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

* FGM brings status/respect to the girl – social acceptance for marriage
* Preserves a girl’s virginity
* Part of being a woman / rite of passage
* Upholds family honour
* Cleanses and purifies the girl
* Gives a sense of belonging to the community
* Fulfils a religious requirement
* Perpetuates a custom/tradition
* Helps girls be clean / hygienic
* Is cosmetically desirable
* Mistakenly believed to make childbirth easier

**Is FGM legal?**

FGM is internationally recognised as a violation of human rights of girls and women. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child/young person abuse and violence against women. A mandatory reporting duty requires teachers to report ‘known’ cases of FGM in under 18s, which are identified in the course of their professional work, to the police[[11]](#footnote-11) .

The duty applies to all persons in our Club who is employed or engaged to carry out ‘teaching work’ in the club, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead; however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her, or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18, and they have no reason to believe the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

Club staff are trained to be aware of risk indicators of FGM identified in this section of the Appendix. Concerns about FGM outside of the mandatory reporting duty should be reported as per our Club’s child/young person protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female users about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

**Circumstances and occurrences that may point to FGM happening are:**

* Child/young person talking about getting ready for a special ceremony
* Family taking a long trip abroad
* Child/young person’s family being from one of the ‘at risk’ communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
* Knowledge that the child/young person’s sibling has undergone FGM
* Child/young person talks about going abroad to be ‘cut’ or to prepare for marriage

**Signs that may indicate a child/young person has undergone FGM:**

* Prolonged absence from Club and other activities
* Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued
* Bladder or menstrual problems
* Finding it difficult to sit still and looking uncomfortable
* Complaining about pain between the legs
* Mentioning something somebody did to them that they are not allowed to talk about
* Secretive behaviour, including isolating themselves from the group
* Reluctance to take part in physical activity
* Repeated urinal tract infection
* Disclosure

**The ‘One Chance’ rule**

As with Forced Marriage (outlined below) there is the ‘One Chance’ rule. It is essential that settings /Clubs/colleges take action **without delay** and make a referral to children’s services.

**8. Forced Marriage**

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child/young person abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Club staff should never attempt to intervene directly as a Club or through a third party. Contact should be made with the Local Authority Safeguarding Hub.

**9. Honour-based Abuse**

Honour based abuse (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who.

* become involved with a boyfriend or girlfriend from a different culture or religion.
* want to get out of an arranged marriage.
* want to get out of a forced marriage.
* wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

**10. One Chance Rule**

All staff are aware of the ‘One Chance’ Rule’ in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance’ to speak to a pupil who is a potential victim and have just one chance to save a life.

Club is aware that if the victim is not offered support following disclosure that the ‘One Chance’ opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

**11. Mental Health**

Staff will be aware that mental health problems can, in some cases, be an indicator that a child/young person/young person has suffered or is at risk of suffering abuse, neglect or exploitation. Whilst Club recognise that only appropriately trained professionals can diagnose mental health problems; staff are able to make day to day observations of children/young people and identify such behaviour that may suggest they are experiencing a mental health problem or be at risk of developing one.

How traumatic Adverse Child/young personhood Experiences and experiences of abuse and neglect can impact on a child/young person’s mental health, behaviour and education through to adolescence and adulthood will be covered in safeguarding awareness training and updates. If staff have a concern about a child/young person/young person’s mental health that is also a safeguarding concern, they will share this with the DSL or deputy. Club will also refer to the mental health and behaviour in Clubs’ guidance[[12]](#footnote-12).

When supporting children/young people experiencing mental health difficulties will explore resources such as

[Senior Mental Health Lead Training](https://www.gov.uk/guidance/senior-mental-health-lead-training)

[Promoting child and young people’s mental health and wellbeing](https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing)

[Rise Above: Resources for Club from Public Health England #esafety](https://www.theeducationpeople.org/blog/rise-above-resources-for-school-from-public-health-england-esafety/#:%7E:text=Public%20Health%20England%20%28PHE%29%2C%20the%20Government%27s%20national%20public,cope%20with%20the%20challenges%20life%20throws%20at%20them.)

[Every Interaction Matters Webinar](https://www.minded.org.uk/Component/Details/685525)

[Wellbeing for Education Recovery](https://www.gov.uk/government/publications/education-recovery-support)

[Preventing and Tackling Bullying](https://www.gov.uk/government/publications/preventing-and-tackling-bullying)

[Promoting and supporting mental health and wellbeing in Clubs and colleges](https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges)

**12. Private Fostering Arrangements**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child/young person for a period of 28 days or more, with the agreement of the child/young person’s parents. It applies to child/young person under the age of 16 or 18 if the child/young person is disabled. Child/young person looked after by the local authority or who are place in residential Clubs, children’s homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Club recognise that most privately fostered child/young person remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child/young person has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify child/young person’s services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this will the DSL and the DSL will notify MASH of the circumstances.

**13. Looked after children and previously looked after children**

The most common reason for children/young people becoming looked after is as a result of abuse and neglect. Our Club will ensure that staff have the necessary skills and understanding to keep looked after/previously looked after child/young person safe. Appropriate staff have information about a child/young person’s looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child/young person/young person and contact arrangements with birth parents or those with parental responsibility.

**14. Children Missing Education**

Attendance, absence and exclusions are closely monitored. The Club will hold more than one emergency contact number for users where reasonably possible. A child/young person going missing or absent from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

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Staff must be alert to signs of children/young people at risk of travelling to conflict zones, female genital mutilation and forced marriage.

**15. Child/young person on Child/young person Abuse (including Sexual Violence, Sexual Harassment and HSB)**

The DSL, Trustee Board and General Manager will take due regard to Part 5, KCSiE

In most instances, the conduct of users towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Club recognise that children/young people are capable of abusing their peers. It will not be passed off as ‘banter’ or ‘part of growing up’. The forms of child/young person-on-child/young person abuse are outlined below.

* domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
* bullying (including cyberbullying, prejudice-based and discriminatory bullying).
* child/young person sexual exploitation – child/young person under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
* harmful sexual behaviour – child/young person and young people presenting with sexual behaviours that are outside of developmentally ‘normative’ parameters and harmful to themselves and others
* upskirting – which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
* serious youth violence[[13]](#footnote-13) – any offence of most serious violence or weapon enabled crime, where the victim is aged 0-19’ i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. ‘Youth violence’ is defined in the same way, but also includes assault with injury offences. All staff will receive training so that they are aware of indicators which may signal that children/young people are at risk from or involved with serious violence and crime.
* initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
* consensual and non-consensual sharing of nudes and semi nudes’ images and or videos (also known as sexting or youth produced sexual imagery).

The term child/young person-on-child/young person abuse can refer to all of these definitions and a child/young person/young person may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with child/young person-on-child/young person abuse (i.e. girls being sexually touched/assaulted, or boys being subjected to initiation/hazing type violence).

Club aims to reduce the likelihood of child/young person-on-child/young person abuse through:

* the established ethos of respect, friendship, courtesy and kindness.
* high expectations of behaviour.
* clear consequences for unacceptable behaviour.
* providing a developmentally appropriate PSHE curriculum which develops users’ understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe.
* systems for any user to raise concerns with staff, knowing that they will be listened to, valued and believed.
* robust risk assessments and providing targeted work for users identified as being a potential risk to other users and those identified as being at risk.

Research indicates that young people rarely disclose child/young person-on-child/young person abuse and that if they do, it is likely to be to their friends. Therefore, Club will also educate users in how to support their friends if they are concerned about them, that they should talk to a trusted adult at the Club and what services they can contact for further advice.

Any concerns, disclosures or allegations of child/young person-on-child/young person abuse in any form should be referred to the DSL using the Club’s child/young person protection procedures as set out in this policy. Where a concern regarding child/young person-on-child/young person abuse has been disclosed to the DSL(s), advice and guidance will be sought from the Local Authority Safeguarding Hub and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

Working with external agencies the Club will respond to the unacceptable behaviour. If a user’s behaviour negatively impacts on the safety and welfare of other users, then safeguards will be put in place to promote the well-being of the users affected and the victim and perpetrator will be provided with support.

**Sexual Harassment, Sexual Violence and Harmful Sexual Behaviour**

The boundary between what is abusive and what is part of normal child/young personhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. Child/young person’s sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. This may include child/young person and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or child/young person. Staff should be vigilant to:

* bullying (including cyberbullying)
* physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
* sexual violence and sexual harassment
* sexting (also known as youth produced sexual imagery)
* initiation/hazing type violence and rituals
* upskirting

**Developmental Sexual Activity**

Encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

**Inappropriate Sexual Behaviour**

Can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child/young person or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child/young person or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some child/young person, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

**Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies

**Consent** – agreement including all the following:

* Understanding that is proposed based on age, maturity, development level, functioning and experience
* Knowledge of society’s standards for what is being proposed
* Awareness of potential consequences and alternatives
* Assumption that agreements or disagreements will be respected equally
* Voluntary decision
* Mental competence

**Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice is available in the Devon multi-agency protocol “Working with Sexually Active Young People” available at <https://www.proceduresonline.com/swcpp/devon/p_underage_sexual_act.html> or go to South West Child/young person Protection Procedures (www.proceduresonline.com) choose Child/young person Protection Procedures, scroll down to Safeguarding Practice Guidance.

**16. Online Safety**

Our users increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as Facebook, twitter, Instagram, Snapchat and ooVoo.

Unfortunately, some adults and other children/young people use these technologies to harm children/young people. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children/young people to engage in sexual behaviour such as webcam photography or face-to-face meetings. Users may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Club has an online safety policy which explains how we try to keep users safe at Club and how we respond to online safety incidents (See flowchart, Appendix 7).

Club will also provide advice to parents/carers when users are being asked to learn online at home and consider how best to safeguard both users and staff.

If concerns are about staff or General Manager refer to LADO before taking any further action

**A concern is raised**

Refer to the DSL if concerns are about a child/young person

Refer to General Manager if concerns are about staff

Refer to Chair of Trustees if concerns are about the General Manager

**What to do if you have an online safety concern:**

What type of
activity is involved? (Use screening tool/e-safety legal framework)

**Incident closed**(Is counselling or advice required?)

**Yes**

**Staff as instigator**

**Staff as victim**

**Child/young person as
victim**

**Child/young person as
instigator**

Establish level of
concern.
(Screening tool)

Establish level of
concern.
(Screening tool)

Establish level of
concern.
(Screening tool)

Establish level of
concern.
(Screening tool)

Potential
illegal or child protection
 issues?

Other
children
involved?

**No**

Who is involved?

DSL to consider need for CP referral

**Yes**

If appropriate, disconnect computer, seal and store.

In-Club action:
DSL,
Head of ICT, senior manager.

SW Child/young person Protection Procedures refer to LADO

**Possible
legal action**

**Possible
legal action**

Counselling
Risk assessment

**Club disciplinary and child/young person protection procedures
(possible parental involvement)**

**Duty LADO: telephone 01392 384964 or email ladosecure-mailbox@devon.gov.uk for a notification form**

If concerns are about staff or General Manager refer to LADO before taking any further action

**17. Youth produced sexual imagery (sexting)**

The practice of children/young people sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children/young people the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where.

* A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
* A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
* A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCIS guidance ‘Sexting in Clubs and colleges: responding to incidents and safeguarding young people’[[14]](#footnote-14), and ‘Sharing nudes and semi-nudes: how to respond to an incident.’[[15]](#footnote-15)

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child/young person is child/young person sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery, they should follow the child/young person protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate Club staff and subsequent interviews with the children/young people involved (if appropriate). Parents/carers should be informed at an early stage and involved in the process unless there is reason to believe that involving parents/carers would put the child/young person/young person at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the Local Authority Safeguarding Hub and/or the Police as appropriate.

Immediate referral at the initial review stage should be made to the Local Authority Safeguarding Hub/Police if.

* The incident involves an adult.
* There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
* What you know about the imagery suggests the content depicts sexual acts which are unusual for the child/young person’s development stage or are violent.
* The imagery involves sexual acts.
* The imagery involves anyone aged 12 or under.
* There is reason to believe a child/young person/young person is at immediate risk of harm owing to the sharing of the imagery, for example the child/young person/young person is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to users involved and may decide, with input from the General Manager, to respond to the incident without escalation to the Local Authority Safeguarding Hub or the police. Such decisions will be recorded.

In applying judgement the DSL will consider if.

* there is a significant age difference between the sender/receiver.
* there is any coercion or encouragement beyond the sender/receiver.
* the imagery was shared and received with the knowledge of the child/young person in the imagery.
* the child/young person is more vulnerable than usual i.e. at risk.
* there is a significant impact on the child/young person involved.
* the image is of a severe or extreme nature.
* the child/young person involved understands consent.
* the situation is isolated or if the image been more widely distributed.
* there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances.
* the child/young person have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our child/young person protection procedures, including reporting to the police or the Local Authority Safeguarding Hub. Otherwise, the situation will be managed within the Club.

The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedure

18. Additional Resources

Further advice on child/young person protection is available from:

NSPCC: <http://www.nspcc.org.uk/>

Childline: [http://www.child/young personline.org.uk/pages/home.aspx](http://www.childline.org.uk/pages/home.aspx)

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Beat Bullying: <http://www.beatbullying.org/>

Child International –making the internet a great and safe place for child/young people. Includes resources for professionals and parents [http://www.child/young personnet.com/](http://www.childnet.com/)

Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Provision for transgender users: [Guidance for maintained Clubs and academies in England on provision for transgender users November 2022](https://safeschoolsallianceuk.net/wp-content/uploads/2022/11/Guidance-for-maintained-schools-and-academies-in-England-on-provision-for-transgender-pupils.pdf)

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**For Early Help, Consultation and Enquiries please contact:**

Telephone:  **0345 155 1071**

Email: Local Authority Safeguarding Hubsecure@devon.gov.uk

Request for Support available at:

[DCC - Request for support (outsystemsenterprise.com)](https://devoncountycouncil.outsystemsenterprise.com/MASH/homepage)

**Emergency Duty Team** out of hours **0345 6000 388**

**Police** non-emergency 101

**For all LADO enquiries** Exeter (01392) 384964

ladosecure-mailbox@devon.gcsx.gov.uk

Further info: <https://new.devon.gov.uk>

[Managing allegations - Devon Children and Families Partnership (dcfp.org.uk)](https://www.dcfp.org.uk/training-and-resources/managing-allegations/)

**Early Help Team**

Senior Manager: Sarah Hunt

Early Help Locality Contact information:

[Early Help Locality Contact Information - Devon Children and Families Partnership (dcfp.org.uk)](https://www.dcfp.org.uk/document/early-help-locality-contact-information/#early-help-service-managers)

Locality Early Help Mailbox

North: earlyhelpnorthsecure-mailbox@devon.gov.uk

Mid & East: earlyhelpmideastsecure-mailbox@devon.gov.uk

South & West: earlyhelpsouthsecure-mailbox@devon.gov.uk

Exeter: earlyhelpexetersecure-mailbox@devon.gov.uk

For emergencies outside of office hours please call:

0345 600 0388

Summary of changes since September 2022

|  |
| --- |
|  |
| *Much of the policy content has remained the same as previous year 2022* |
| Page 3 | New hyperlink added: Filtering and monitoring systems in Clubs and colleges (DfE March 2023) |
| Page 6 | Reference to safeguarding requirements to be included in site letting agreements as a condition of use and occupation. |
| Page 8 | Added – filtering and monitoring reference to DSL responsibilities, bullet point 9.Added – reference to online filtering and monitoring knowledge in Staff Role, bullet point 11Added – reference to absent users in Staff Role, bullet point 13. |
| Page 10 | Added – absent to bullet point 1 |
| Page 29 | Removal of The Link Programme (Anna Freud Centre) hyper link |
| Appendix 14 Child Missing Education | Added reference ‘absent from education’  |
| Appendix 16 Online Safety | Added (final paragraph) reference to staff training to include *understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.* |
| Appendix 18 Additional Resources | Removal of links to Mermaids, Clubs Transgender Toolkit and Intercom TrustAdditional link provided for ‘Guidance for maintained Clubs and academies in England on provision for transgender users’ November 2022 |
| MASH contacts poster | Emergency Duty Team phone number amendedUpdated link for Request for Support (MASH)Removal of MASH postal addressFurther information links for LADO includedUpdated Early Help Senior Manager details Removal of Early Help Area Managers contact detailsInclusion of Early Help Locality Contact Information |
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1. Wherever the word “staff” is used, it covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc. and trustees. [↑](#footnote-ref-1)
2. Guidance regarding DBS checks recently updated by the Protection of Freedoms Act 2012 [↑](#footnote-ref-2)
3. The UK Data Protection Act 2018 (DPA 2018) is supplementary to the General Data Protection Regulation 2016 (the GDPR) and replaces DPA 1998. [↑](#footnote-ref-3)
4. DCFP Levels of Need document [↑](#footnote-ref-4)
5. Refer to “Guidance for Safe Working Practice” [↑](#footnote-ref-5)
6. The UK Data Protection Act 2018 (DPA 2018) is supplementary to the General Data Protection Regulation 2016 (the GDPR) and replaces DPA 1998. [↑](#footnote-ref-6)
7. [The Prevent duty](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf) [↑](#footnote-ref-7)
8. [Promoting Fundamental British Values](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf) [↑](#footnote-ref-8)
9. [DCFP Adolescent Safety Framework info and Safer Me Assessment](https://www.dcfp.org.uk/training-and-resources/policies-and-procedures/adolescent-safety-framework-safer-me/) [↑](#footnote-ref-9)
10. [DCFP MACE guidance](https://www.dcfp.org.uk/child-abuse/child-sexual-exploitation/child-exploitation-information-for-professionals/) [↑](#footnote-ref-10)
11. [FGM procedural information](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf) [↑](#footnote-ref-11)
12. [Mental health and behaviour in Clubs: guidance](https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2) [↑](#footnote-ref-12)
13. [Preventing youth violence and gang involvement](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf) [↑](#footnote-ref-13)
14. [Sexting in Clubs and colleges](https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis) [↑](#footnote-ref-14)
15. [Sharing nudes and semi-nudes: how to respond to an incident (UCKIS)](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview) [↑](#footnote-ref-15)