

## Child Protection and Safeguarding

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### 1. Introduction

360 Children's Residential Services (360CRS) is committed to safeguarding and promoting the welfare of children and young people. This is defined as protecting children and young people from maltreatment and preventing impairment of their health and development by ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care (*Working Together to Safeguard Children updated Feb 2024*).

- This document sets out how 360CRS ensures that all staff recognise their responsibility for safeguarding and promoting the welfare and safety of children within their care.
- Please ensure to reference and refer to safeguarding and child protection policies and procedures of the local authority that the home is located in. 360 CRS is a national organisation that covers many regions.
- This policy is in accordance with the Children's Homes Regulations 2015.

### 2. Scope

This policy applies to all staff employed by 360CRS including any agency workers and contractors used within the setting.

### 3. General Statement

360CRS is committed to safeguarding children and young people.

- Everything we do is designed to promote the safety and well-being of the children and young people with whom we work, regardless of their age, disability, gender, racial heritage, religious beliefs, sexual orientation, or identity.
- All staff are responsible for cultivating an environment of transparency and awareness where mistakes can be shared and constructive suggestions made.
- All staff take responsibility for questioning and, where necessary, challenging accepted patterns of behaviour within 360CRS Children's Homes.

- All staff complete Child Protection/ Safeguarding training during their probation period and this is updated annually.
- All staff are aware of their roles and responsibilities in safeguarding children and young people.

#### 4. Definitions

**Child:** A Child is up to the age of 16 and young person is between 16 - 18 years old.

**Local Authority Designated Officer (LADO):** Every local authority has a officer who is responsible for co-ordinating the response to concerns that an adult (Professional) who works with children may have caused them or could cause them harm.

**OFSTED:** The office for Standards in Education, Children's Services and Skills. They inspect services providing education and skills for learners of all ages. They also inspect and regulate services that care for children and young people

**Multi – agency safeguarding Hub (MASH):** brings key professionals together to facilitate early, better quality information sharing , analysis and decision making, to safeguard vulnerable children and young people more effectively.

#### 5. Types of Abuse – Refer to Appendix 1 for more information, including signs and symptoms.

##### Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/physical-abuse/> [accessed 15/12/2022]

##### Sexual abuse

Involves forcing, enticing or encouraging a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-abuse/> [accessed 15/12/2022]

##### Emotional abuse

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

[www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/emotional-abuse](http://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/emotional-abuse) [accessed 15/12/2022]

##### Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger

- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.

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

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/neglect/> [accessed 15/12/2022]

### **Bullying and Cyberbullying**

Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Bullying that happens online, using social networks, games, and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

[https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/bullying-and-cyberbullying](https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/bullying-and-cyberbullying/) [accessed 15/12/2022]

### **Domestic Abuse**

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence – domestic abuse includes any emotional, physical, sexual, financial or psychological abuse.

It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers.

Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships. Domestic abuse can seriously harm children and young people.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/> [accessed 15/12/2022]

### **Child Sexual Exploitation**

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

*[This definition of child sexual exploitation was created by the UK National Working Group for Sexually Exploited Children and Young People (NWG) and is used in statutory guidance for England].* <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/what-is-child-sexual-exploitation> [accessed 15/12/2022]

### **Child Trafficking**

Child Trafficking is where children and young people are tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold. Children and trafficked for:

- Child sexual exploitation
- Benefit fraud
- Forced marriage
- Domestic servitude such as cleaning, childcare, cooking
- Forced labour in factories or agriculture
- Criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, bag theft.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-trafficking> [accessed 15/12/2022]

### **Grooming**

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse or exploitation.

Children and young people can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional.

Groomers may be male or female. They could be any age.

Many children and young people don't understand that they have been groomed, or that what has happened is abuse.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/grooming> [accessed 15/12/2022]

### **Female Genital Mutilation (FGM)**

FGM is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision, cutting or Sunna.

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/female-genital-mutilation-fgm>

## **6. High Risk and Emerging Issues**

### **County Lines and Cuckooing**

Vulnerable children and young people are being exploited and used by organised criminal networks to transport and sell class A drugs. These children and young people are at serious risk of criminalisation, sexual exploitation, and exposure to violence. This is facilitated by a group who may not necessarily be affiliated as a gang, but who have developed networks across geographical boundaries to access and exploit existing drugs markets in these areas.

The exploitation of young and vulnerable persons is a common feature in the facilitation of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to secure the use of dwellings held by vulnerable people in the rural marketplace (commonly referred to as cuckooing).

The group, or individuals exploited by them, travel regularly between the urban hub and the rural marketplace, to replenish stock and deliver cash. This movement is not unique to county lines drug supply but is generally more frequent and in smaller deal amounts compared to most other drug supply methods

### **Missing young people and the link between missing and county lines**

Every precaution is taken through the use of risk assessments and thorough planning and supervision to ensure that children and young people are safe both at school, college, home and on outings. If a child and young person go missing from our care, it is considered a potential indicator of abuse or neglect. Our staff members should follow our Missing from Care policy and procedures in the event of someone going missing. Accordingly, they are expected to act to identify any risk of abuse and neglect, including sexual abuse or exploitation. In addition, all homes must inform the Local Authority of any student who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 days or more or as such intervals agreed with the Local Authority. It is essential that all staff are alert to signs such as travelling to conflict zones, FGM and forced marriage.

Coercion and manipulation often increase a young person's vulnerability to exploitation, pushing them towards going missing and becoming involved in criminal activities. Some individuals may be pulled towards exploitation through the promise of money, gifts, affection and status. However, they may be then be forced to work for these people as they are coerced into believing that they are indebted to them.

### **Teenage Relationship Abuse**

Research has shown that teenagers didn't understand what constituted abusive behaviours such as controlling behaviours, which could escalate to physical abuse, e.g. checking someone's phone, telling them what to wear, who they can/can't see or speak to and that this abuse was prevalent within teen relationships. Further research showed that teenagers didn't understand what consent meant within their relationships. They often held the common misconception that rape could only be committed by a stranger down a dark alley and didn't understand that it could happen within their own relationships. This led to these abusive behaviours feeling 'normal' and therefore left unchallenged as they were not recognised as being abusive.

Vulnerable Individuals may struggle to understand such concept and potential consequences of their own, their peers or others behaviour towards them, therefore maximum effort will be taken to raise awareness of it and effectively respond to such situations.

**Peer on Peer abuse and sexual violence and harassment**

All staff will be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), resist or religious bullying, gender-based violence/sexual assaults and sexting. Staff should be clear as to the school or college's policy and procedures with regards to peer-on-peer abuse.

Research suggests that girls and young women are more at risk of abusive behaviours perpetrated by their peers; however, it can also affect boys and young men, those with learning difficulties or disabilities, LGBTQ Children, young people, adults and those who are from different communities.

Situations where young people are forced or coerced into sexual activity by peers or associates can be related with gang / serious youth violence activity but that is not always the case. Peer influence or peer pressure is a major factor in the decisions made by young people to join groups. Many young people see it as a "way out" from their day-to-day life and feel a strong bond with their peers, one which they may be lacking at home.

**Sexting**

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows to share media and messages. Sexting may also be called: trading nudes, dirties, pic for pic. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they:

- take an explicit photo or video of themselves or a friend
- share an explicit image or video of a child, even if it's shared between children of the same age
- possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

However, as of January 2016 in England and Wales, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest. There are many reasons why a young person may want to send a naked or semi-naked picture, video or message to someone else:

- joining in because they think that 'everyone is doing it'
- boosting their self-esteem
- flirting with others and testing their sexual identity
- exploring their sexual feelings
- to get attention and connect with new people on social media
- they may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent

The risks of sexting are that the young person has no control of images and how these are shared, and the subsequent risks of blackmail, bullying and harm.

In response to this 360CRS will provide education to prevent individuals from becoming victims of such situation by encouraging them to think about the risk of sexting and understand how to seek help when approached to take part in sexting. More information can be found on: <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting>

**7. Roles and Responsibilities**

All staff must be aware of their duty to recognise and act on concerns about child abuse.



### **Designated Safeguarding Lead**

**Richard Ellis-Tole – Operations Manager and Responsible Individual**

[Richard.ellis@360crs.org](mailto:Richard.ellis@360crs.org) / 0333 1881 360

The role of Designated Safeguarding Lead is to:

- Being the first point of contact for all staff to go to for advice if they are concerned about a child
- Take lead responsibility for managing safeguarding issues and cases.
- Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Board; child or adult.
- Act as a source of advice, support and expertise within the location when deciding to make a referral by liaising with relevant agencies.
- Identify safeguarding training needs and organise training.
- Participate in local safeguarding boards when required.
- Evaluate and contribute to high standards of safeguarding practice at the location.
- Work to ensure that wellbeing of children and young people placed in our school/home is in constant focus and that they are guarded from harm or abuse.

We have made arrangement for covering and supporting the role of the Designated lead when Richard Ellis-Tole is unavailable, Or if the concern in question is directly relating to his role.:



### **Deputy Designated Safeguarding Lead**

**Mia Lawrence – HR and Onboarding Officer**

[Mia.lawrence@360crs.org](mailto:Mia.lawrence@360crs.org) / 03331881360

**Note:** It is not the responsibility of the Designated Safeguarding Lead or Deputies to decide whether a child has been abused or not- that is the responsibility of investigative statutory agencies such as MASH, LADO or the police. However keeping children safe is everybody's business and all staff should know who to go to and how to report any concerns they may have about a child being harmed or at risk of being harmed.

### **Responsible Individual/ Operations Manager Responsibilities**

We have a clear understanding that our first duty is to promote children's rights, to protect them from harm or injury and safeguard their welfare. This overall duty permeates all our policies and procedures.

To achieve a high level of protection overall we undertake the following:

- We gather as much relevant information as possible about children to help us decide whether we can meet their needs and, if we can, to ensure we are sensitive to their needs and take all reasonable steps to protect them from harm and injury.
- We provide high levels of supervision balanced by appropriate opportunities for privacy and security.
- Methods to de-escalate confrontations or potentially violent behaviour are used wherever appropriate to avoid the use of physical intervention. Physical intervention is only used in exceptional circumstances, to prevent injury to any person (including the child who is being restrained) or to prevent significant damage to the property of any person (including the child who is being restrained). *Please refer to Policy 9 Positive Management of Behaviour.*
- We will provide plenty of opportunities for children to express their feelings in terms of their day-to-day living, education and regarding planning for the future.
- We will provide information, advice and education to children designed to help them protect their own rights and lead a healthy lifestyle.
- We will carefully select, vet, train and supervise staff and we will take all reasonable steps to ensure those who we do employ remain committed to the principles contained in this and all other of our policies.
- We will provide staff with clear procedures for identifying and responding to suspicions or allegations of significant harm.

- If at any time we are suspicious that children are being or are likely to be subject to Significant Harm or otherwise placed at risk, we will act swiftly to prevent it. All suspicions of Significant Harm will be openly discussed with **MASH** and other appropriate agencies.
- We will not continue to employ staff who engage in abusive relationships with children or who have a propensity to place them at risk of injury or harm. As necessary we will advise the Disclosure and Barring Service and the Local Authority Designated Officer (LADO) of staff whose employment has ceased as a result of abusive behaviour. We will also ensure that such decisions are communicated to potential future employers.

### Registered Manager's Responsibilities

Each manager is responsible for:

- Ensuring all staff have access to the South West Child Protection Procedures and for ensuring all staff are fully conversant with these procedures
- Ensuring all staff have received updated child protection training.
- Ensuring that all employees who come into contact with children and young people are subject to a formal Disclosure and Barring Service.
- Holding and being conversant with the most up-to-date copy of 'Working Together to Safeguard Children'.
- Holding and being conversant with the most up to date Children's Homes Regulations and relevant parts of Volume 4 of the Children Act Regulations & Guidance: "Residential Care".
- Ensuring staff are briefed on the contents of the above regulations and guidelines and on the procedures in this chapter and elsewhere in the manual in regard to the identification and reporting of Significant Harm;
- Ensuring that the appropriate procedures are followed and liaising with relevant officers within the Children's Services and elsewhere over protection issues and will notify Ofsted and the Placing Authority of the instigation and outcome of any child protection enquiries relating to any person accommodated at 360CRS.

### Staff Responsibilities

All staff employed by 360CRS should be alert to the possibility of child abuse or neglect. All staff who come into contact with children will have access to and work to **Regional based Child Protection Procedures**. These can be accessed via your homes sharepoint or your local authority guidance

Methods to de-escalate confrontations or potentially violent behaviour are used wherever appropriate to avoid the use of any physical intervention. Physical intervention is only used in exceptional circumstances, to prevent injury to any person (including the child who is being Held) or to prevent serious damage to the property of any person (including the child who is being restrained) *Please refer to Policy 9 Positive Management of Behaviour.*

All staff will exercise their own professional accountability to safeguard children and promote their welfare



**Keeping  
children safe  
is everyone's  
responsibility**

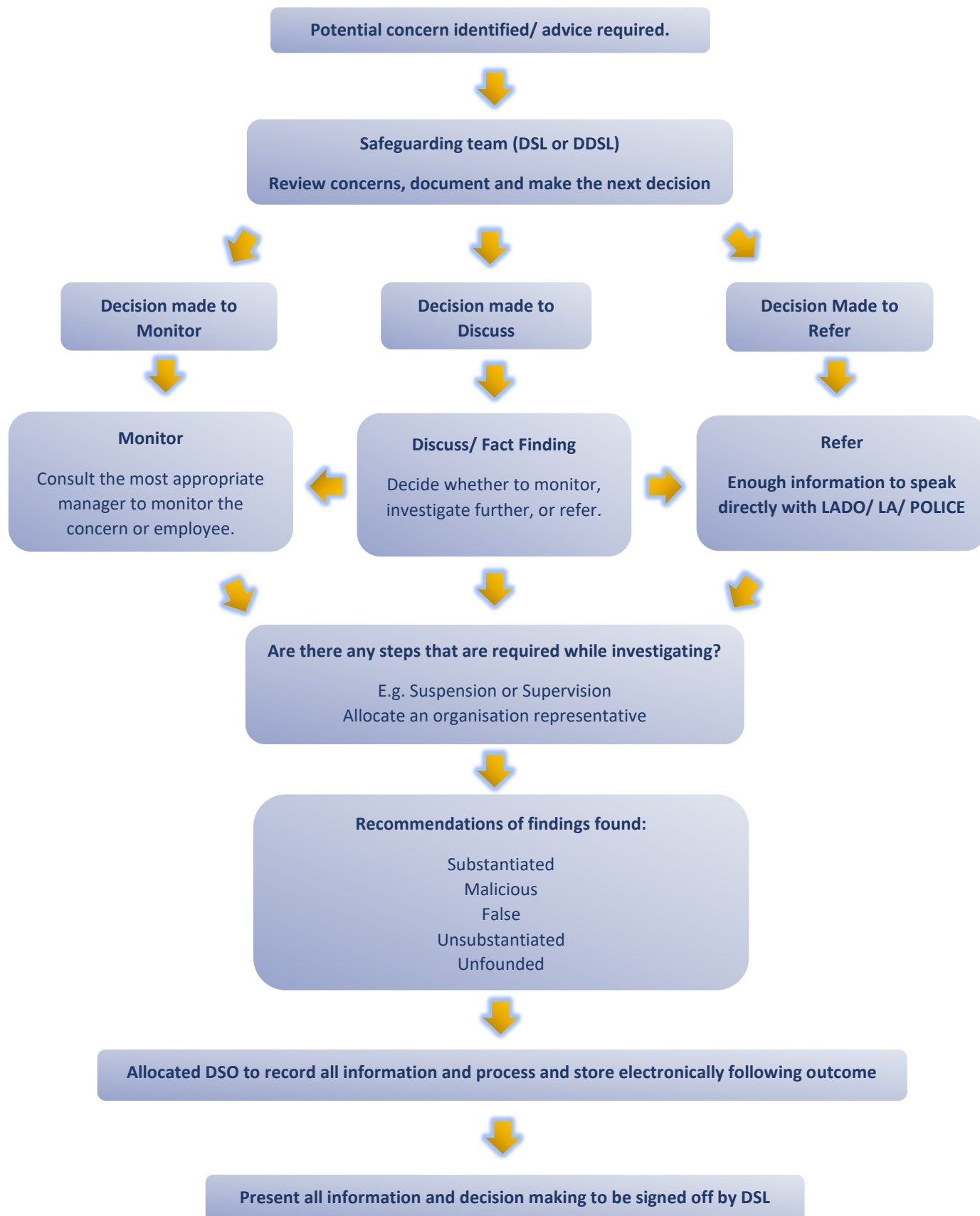




## 8. Flow Chart Procedure

**DSL** – Designated Safeguarding lead    **DSO** – Deputy Safeguarding Officer    **LADO** – Local Authority Designated Lead

The Flowchart below sets out the procedure which should be followed:





## **9. Procedures to follow when there are concerns that a child has or is likely to suffer significant harm**

The following actions should be taken when there is any concern, disclosure, suspicion or allegation about the welfare of a child or young person, which is causing or likely to cause Significant Harm (Physical Abuse, Sexual Abuse, Emotional Abuse and Neglect are all categories of Significant Harm). This includes 'historical abuse', that may have occurred at some time in the past and may not have been reported or investigated. It includes harm perpetrated by any person, including harm perpetrated by another child, a visitor, a person in the community, teacher, social worker, parent, other carer including colleagues within the business.

Staff should firstly make their report to the manager, unless the manager is implicated, in which case staff must notify the Designated Safeguarding Lead (DSL).

If the DSL implicated in a concern, one of the following can be contacted:

- Another member of the Safeguarding Team
- LADO
- NSPCC
- OFSTED
- The Placing Authority.
- POLICE

### **Emergency**

In an emergency, where there is an immediate risk to the child, staff must take necessary action. This may involve asking for Police assistance or seeking emergency medical assistance e.g., taking the child to hospital or contacting the emergency services via 999. If the child is taken to hospital or the Police are called, staff must inform them that there is a suspicion of significant harm. Thereafter staff must notify the Registered Manager of the Home (or where there is concern that the manager might be implicated, the DSL).

Once notified, the manager will report to the DSL who will assist the manager in following the Local Safeguarding Children Board Procedures and making contact with the Local Authority Children's Social Care Services.

The manager must inform the Regulatory Authority Ofsted and the Placing Authority of the investigation and outcome of any subsequent Child Protection Enquiry.

At this stage any action taken must not alert the person(s) who may have caused or be implicated in causing the abuse or harm.

### **Non-Emergency**

The following summarises the steps to be taken by staff if they suspect or it is reported to them that a child has suffered or is likely to suffer Significant Harm.

Any member of staff who receives a report or has any suspicions that a child has been or could be subject to Significant Harm must immediately notify the Manager of the home (or where there is concern that the manager might be implicated the DSL).

Non-action is not an option in the protection of children and all staff have a duty to act. Failure to do so may be gross misconduct and appropriate disciplinary action will be taken.

### **When you receive a concern or disclosure**

**Listen** to what they say and taken them seriously. Staff may ask questions or seek clarification about concerns raised with them, but they may not take any actions to investigate or in any way make judgments about what is reported to them. Properly trained, independent, professionals, if necessary, must undertake investigations. Staff must not give absolute guarantees of confidentiality to those who report possible Significant Harm to them, but they should guarantee that the information will only be passed to those who need to know to ensure proper action is taken to sort the problem out.

**Record** in detail as soon as possible of what you have been told, detailing the questions asked and the replies given and the actions taken and by whom. Include, timings and any injuries sustained. This must be recorded in the words used by the person raising the concern and recorded as soon as practically possible.

Ensure this is completed on the Safeguarding referral form.

#### **Do Not:**

- Investigate
- Make promises you cannot keep
- Ask leading questions
- Confront the offender

The next step is to notify the DSL and pass the Referral Form to them within one hour or as soon as is possible. If the Designated Safeguarding Lead is unavailable, then the Deputy should be informed. All staff know that they can contact the Local Authority directly should that be necessary. Any allegation against a staff member must also be reported to the DSL. Guidance is available to staff who have an allegation made against them.

### **10. Allegations or suspicion of harm procedures**

#### **Allegations and suspicions of harm by one or more young person against another young person**

All young people involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for dealing with such abuse, where there is 'reasonable cause to suspect that a young person is suffering or likely to suffer significant harm' will be followed. We will investigate young person-on-young person abuse following the same procedure as above. The Designated Safeguarding Team will work with the relevant managers to discuss how to formally proceed.

A summary of the update info in Keeping Children Safe in Education from September 2018 relating to peer-on-peer abuse

- Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.
- Staff need to make clear to young people that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Staff and young people should not tolerate or dismiss sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- Staff must challenge behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. Incidents of the above should be reported immediately to the DSL.

#### **Allegations of abuse of an individual that is from outside the organization**

If we were given information that suggested that a member of staff was abusing someone who does not work within our organisation the Designated Safeguarding Team would immediately report to the Local Authority and LADO. The Designated Lead would be kept informed. We would then wait to be formally advised by the external agencies if they required any further support.

#### **Allegations and Suspicions of Harm by Those Whose Work with Children**

Children can be subjected to abuse by those who work with them in any and every setting. All allegations of abuse or maltreatment of children by a professional, staff member or volunteer must therefore be taken seriously and treated in accordance with consistent procedures.

When an allegation is made against a staff member, a set procedure must be followed. Please see flow chart in section 8

We must act on every allegation. However, staff who are subject of an allegation have the right to their case dealt with fairly, quickly and consistently and to be informed of the process. Refer to **Support during an allegation**.

Staff who receive the allegation must complete the Safeguarding referral form and pass this to the Designated Team within 1 working day. If the manager is implicated, staff must notify the Designated Safeguarding Officer's direct.

If the Director or Safeguarding Officer are implicated in a concern one of the following can be contacted:

- Another member of the Safeguarding Team
- LADO
- NSPCC
- POLICE
- OFSTED
- The Placing Authority.

Priority will be to ensure the immediate safety of the child and any other children affected or in contact with the individual and to consider what supervision arrangements are required to safeguard the child.

Procedures will be applied with common sense and judgment. Some allegations will be so serious and will require immediate referral to the Local Authority Designated Officer (LADO) and the police for investigation. Others may be much less serious and at first sight might not seem to warrant consideration of reporting to the police or LADO. However even less serious allegations need to be objectively examined by someone independent and the Safeguarding Officers will always consult with the LADO.

This consultation with the LADO will aim to establish the following:

- That the allegation is within the scope of procedures for a LADO discussion.
- That the allegation is not demonstrably false or unfounded
- The nature of the concern, how and why it has arisen, and any previous information about the child/ accused person and their relationship with the accused person.
- Any background information relevant to the allegation
- Any arrangements taken to secure the immediate safety of the children, including ensuring the individual's own children are safeguarded
- Necessity for a Strategy Meeting and whether the police and children's services should be contacted.
- If the parents/carers of the child concerned are not already aware of the allegation, there will be a discussion about how and by whom they should be informed. In some circumstances the manager may need to advise parents of an incident involving their child straight away. Thus, consideration on how to consult formally with them about the investigation needs to be agreed, deciding on how this should be done, balancing this with the overriding need to ensure the child's safety.

The Designated Safeguarding Team should inform the accused person about the allegation as soon as possible after consulting the LADO. However, where a Strategy Meeting is needed, or it is clear that the police or Children's Services may need to be involved, that should not be done until those agencies have been consulted and have agreed what information can be disclosed to the person. If the person is a member of a union or professional association s/he should be advised to seek support from that organisation.

Staff concerned may be suspended from work. During the enquiry the staff concerned will be asked not to contact or to discuss the matter with colleagues or children and must not visit any of the homes. The member of staff will be given a nominated person for support who they can contact and who will keep them up to date on progress.

There are four possible outcomes to the initial stages of investigation:

**1. There is cause to suspect a child is suffering or is likely to suffer significant harm.**

The LADO will undertake an initial assessment and if there remain concerns that the child is at risk of suffering significant harm and strategy meeting is likely to be arranged. This may lead to a Section 47 Enquiry (Child Protection Enquiry).

**2. The threshold of Significant Harm is not considered to be reached, but there is cause to suspect that a criminal offence has been committed and a police investigation is necessary.**

Further police investigation is required, and the LADO will have discussions with the police to evaluate the allegation and decide how it should be dealt with.

**3. The threshold of Significant Harm is not considered to be reached and a police investigation is not necessary.**

However, 360CRS may conduct an internal investigation and consider whether to take disciplinary action in respect of the individual.

**4. No further action is required**

Staff should familiarise themselves with the **Whistleblowing Policy** which indicates that **if staff fail to report an incident of abuse or suspected abuse, of a child accommodated in the home to an appropriate person, this is a ground on which disciplinary proceedings may be instituted.** An 'appropriate person' is the Registered Manager, One to One's Designated Safeguarding Officers, Ofsted, the child's social worker or the police.

See **Whistle Blowing policy** for further guidance.

## Disclosure and Barring Service

If 360CRS removes an individual (paid worker or unpaid volunteer) from working with children (or would have, had the person not left first) because the person poses a risk of harm to children, 360 CRS must make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.

## 11. Training, Advice and Support

### Training

360CRS staff will know how to contact their Registered Manager (or Deputy) for advice and support on Child Protection issues. This will be achieved through a robust Induction Programme and ongoing training, provided by 360CRS. During induction, all staff complete the Group 2 and 3 Safeguarding Awareness course and are required to complete this course three yearly thereafter. All Managers and the Designated Safeguarding Officer attend Group 3 Child Protection Training and are required to complete this course 2 yearly thereafter. All staff are required to attend training in Child Sexual Exploitation. The Designated Safeguarding Officer attends further training in Safer Recruitment, Managing Allegations Against Staff and specific training for the Designated Safeguarding lead role. During recruitment, at least one person on the panel will have completed training in Safer Recruitment.

360CRS will ensure that Child Protection Training Programmes are reviewed and updated in line with current legislation to provide staff with skills appropriate to their roles and responsibilities.

Annual appraisals must include reference to Child Protection Training needs relevant to their roles and responsibilities.

The Registered Manager should ensure that professional development plans incorporate the Child Protection development needs of all staff.

Staff will have access to Child Protection Supervision as appropriate to their role and in line with guidance such as **Working Together to Safeguard Children**.

### Advice and Support

All staff can access advice and support in relation to Child Protection issues from the Registered Manager, the Registered Manager's deputy, the Operations Manager or the Designated Safeguarding Team. Out of normal office hours if the Registered Manager, Deputy or Designated officer is unavailable, advice can be sought from MASH on 0345 155 1071.

### 12. Safer Recruitment – Please see safer recruitment policy for a comprehensive breakdown

One to One is committed to safeguarding children and young people and protecting adults that work with them.

**Safer Recruitment** reflects the guidelines, Procedures and legislation that is followed doing all recruitment.

**References** - A minimum of two employment references will be obtained. These will include the applicants current or most recent employer. Referees are contacted directly and 360CRS does not accept open references or references addressed to 'whom it may concern' as these may have been written as part of a settlement agreement. Written reference requests are sent to referees with a photograph of the applicant to verify the identity of the applicant with the referee. Once written references are returned, telephone enquiries are made to verify the reference and to follow up any discrepancies or explore details further.

Once these checks are complete and satisfactory an applicant will be able to commence employment. All new employees are provided with a copy of the 360CRS Code of Conduct prior to their start date.

**Induction** - The induction process typically lasts for 12 - 24 weeks. This period can be extended if required or reduced in exceptional circumstances for example if the employee has prior experience and training in the role. During the induction period, the employee will be supervised by a second more experienced member of staff and will complete all mandatory training.

New employees progress is discussed regularly between the Registered Manager, Operations Manager and Director. All new employee's will receive fortnightly supervision during the induction process.

**Agency Staff** - 360CRS rarely uses agency staff. In circumstances where there is no other option but to use agency staff, 360CRS will ensure that all information in relation to Schedule 2 of the Children's Homes Regulations 2015 has been obtained. Agency workers will never work alone and will always work alongside an experienced member of staff.

**Information to be Held on each Employees File** – Each employee file is stored centrally and securely, the registered manager will also have access. Any staff that start work with the young people need to have successfully passed a list of checks. It is essential that all of the required information detailed in Schedule 2 of The Children's Homes Regulations (2015) is held on each person that works for 360CRS, before they work unsupervised with the children.

### 13. Additional Information and Further Reading and Guidance to be Read in conjunction with this Policy:

### Links to other policies and guidance

South West Child Protection Procedures (2020)  
 HM Government: Working Together to Safeguarding Children (2018)  
 Devon and Torbay Safeguarding Children's Board  
 Children's Homes Regulations (2015)  
 The Children's Act 1989  
 DfE Statutory Guidance on Children who run away or go missing from home or care (2014)  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2#full-publication-update-history>

### Reviews and Amendments

Date	Name	Comments
16.03.2023	Richard Ellis- Tole	Updated and finalised
24.09.2024	Richard Ellis – Tole	Updated – Regionalised document