



# Statement of Purpose Earthsea House

E-mail: [enquiries@childhoodfirst.org.uk](mailto:enquiries@childhoodfirst.org.uk)

Web: [www.childhoodfirst.org.uk](http://www.childhoodfirst.org.uk)

Registered charity: 286909

Childhood First registered in England: 1708301 as a Company Limited by Guarantee

## Contents

<b>1.</b>	<b>Overall Aims and Objectives</b>	<b>4</b>
<b>2.</b>	<b>Quality and Purpose of Care</b>	<b>5</b>
2.1	Ethos and philosophy	5
2.2	Admissions policy and criteria	5
2.3	Age range, gender and numbers of children	6
2.4	Any special needs of the children accommodated	6
2.5	Range of needs the home is intended to meet	7
2.6	Cultural, linguistic and religious needs	7
2.7	Facilities and services	8
2.8	Accommodation and room sharing	8
2.9	Suitability of location	9
<b>3.</b>	<b>Treatment and Therapeutic Approach</b>	<b>9</b>
3.1	Specific therapeutic techniques used in the home	9
3.2	The group environment	10
3.3	Children's groups	11
3.4	Individual Psychotherapy	11
3.5	Evaluation of the placement	12
<b>4.</b>	<b>Incorporating Children's Views, Wishes and Feelings</b>	<b>13</b>
4.1	Consultation with children about the operation of the home and the quality of their care	13
4.2	Equality and diversity	14
4.3	Anti-discriminatory practice	16
4.4	Children's rights	16
<b>5.</b>	<b>Education</b>	<b>16</b>
5.1	Special educational needs	17
5.2	The education structure	17
<b>6.</b>	<b>Enjoyment and Achievement</b>	<b>17</b>
6.1	Children's participation in cultural, recreational and sporting activities	17
<b>7.</b>	<b>Health</b>	<b>18</b>
7.1	Exercise	19
7.2	Diet	19
7.3	Smoking	20
7.4	Alcohol, drugs and illegal substances	20

<b>8.</b>	<b>Positive Relationships</b>	20
8.1	Contact between children and parents, relatives and friends	20
8.2	Working in partnership	21
<b>9.</b>	<b>Protection of Children</b>	21
9.1	Promoting appropriate behaviour, control, physical intervention and	21
9.2	Restrictive physical intervention	23
9.3	Rewards and incentives	24
9.4	Sanctions	24
9.5	Prohibited methods of control	25
9.6	Deprivation of liberty	26
9.7	Surveillance within the home	26
9.8	Fire precautions and emergency procedures	26
<b>10.</b>	<b>Safeguarding and Child Protection</b>	27
10.1	Preventing bullying	27
10.2	Child sexual exploitation (CSE)	28
10.3	Child criminal exploitation (CCE)	28
10.4	Radicalisation of children	28
10.5	Female genital mutilation and other emerging safeguarding issues	29
10.6	Internet safety	29
10.7	Significant events	30
10.8	If a child goes missing and action taken when a child returns from going missing	30
<b>11.</b>	<b>Leadership and Management</b>	31
11.1	Registered Provider and Registered Manager	31
11.2	Consultants and therapists	32
11.3	Staff recruitment	32
11.4	Staff team	33
11.5	Administration and auxiliary staff	38
11.6	Staff training and iST	40
11.7	Staff supervision	41
<b>12.</b>	<b>Complaints &amp; Data Protection</b>	41
12.1	Complaints by children	41
12.2	Complaints by employees	42
12.3	Complaints by third parties	42
12.4	Data protection	43

---

## **1. Overall Aims and Objectives**

Earthsea House is one of five centres run by the charitable organisation Childhood First. Our work is based on our Integrated Systemic Therapy (iST) model, which has evolved through over 40 years of working with children and young people. This is a holistic, group-based approach founded on the twin traditions of milieu therapy and systemic psychotherapy.

Earthsea House is a purpose-built, specialist residential therapeutic community providing therapeutic care and treatment along with family support for psychologically traumatised children. Earthsea House specialises in the treatment of children who present severe emotional and behavioural problems resulting from attachment difficulties usually rooted in early life trauma. We offer an integrated systemic programme of care, therapeutic work and education for up to 11 children, aged 5-10 years on admission. Placements are for 52 weeks a year with facilitation of all necessary arrangements for contact with families and significant others.

Led by the Registered Manager, Earthsea House provides a safe environment designed for group living and learning. The children require and we provide dedicated, understanding and knowledgeable therapeutic care staff who support children to work through their experiences of trauma. We meet each child's needs through a combination of individual and group work. Staff support children to work through their experiences, over time enabling them to engage as members of a group who are valued, both collectively and individually.

Our aim is to help children develop the ability to create and sustain meaningful and trusting relationships with others; providing them with interpersonal skills that can be transferred onto other relationships in their next placement and later in their lives.

For all children placed at Earthsea House we aim to achieve the following positive outcomes:

- Be safe in the present and to develop ways of relating to others and skills which will help ensure future safety
- Have a positive experience of being well cared for
- Become healthier, physically and mentally
- Experience positive relationships with reliable adults
- Develop the capacity for making healthy relationships
- Develop emotionally, educationally and socially
- Benefit from the experience of play

- 
- Be able to engage in verbal communication and that this should be developed as an alternative to acting out difficult feelings in the form of anti-social behaviour
  - Develop internal resources (with support) to cope with everyday situations which previously may have caused high levels of stress
  - Develop internal personal boundaries and a sense of an autonomous self
  - Develop age-appropriate independence

## **2. Quality and Purpose of Care**

### **2.1 Ethos and philosophy**

The Childhood First document 'Integrated Systemic Therapy for Traumatized Children and Young People' describes in detail the ethos and philosophy on which the care, education and treatment at Earthsea House is founded. We hold this document in the home and additional information regarding our therapeutic approach is available on request. Children placed at Earthsea House have experienced severe difficulties in their relationships with others and in the relationships between those around them. By attending to both aspects, we hope the capacity to relate will recover and outcomes in all areas of life will subsequently improve.

Our therapeutic expertise is located in systemic and psychoanalytic thinking and practice that offers transformative insight, particularly in a group setting, to children suffering profound emotional or mental trauma. Robust theory and organisational structures together provide the setting within which healing can take place and traumatised children can learn the ability to make healthy attachments, process feelings and relate to others. Our family systems-based approach allows healthy relationships to develop across the group of children and staff. The group experience powerfully counters the dangerous sense many children have formed that they do not matter to anyone and that nobody matters to them.

In addition, our facilities present a warm, creative, extended family home environment. The environment is of a high quality and maintained with careful attention to detail. We take care to ensure our environment represents security, wholeness and warmth at all times. The children's participation in thinking about all aspects of living together, including the environment, is an integral part of the group work and of their treatment.

### **2.2 Admissions policy and criteria**

Following a referral from a local authority, a referral panel meeting will be held, consisting of the Registered Manager, Deputy Director, Assistant Directors, members of our therapeutic care staff and where possible the Clinical Case Administrator and

---

Placement and Family Support Worker. The panel will consider children who are age 10 or under who have experienced inadequate early attachment and assessed to possess sufficient intellectual capacity to be able to benefit from our treatment approach regardless of their educational attainment. This forms part of the iST Assessment Planning Treatment Transition (APTT) Impact Assessment which is completed prior to a child's placement within the home.

As part of the admission process, we provide the social worker with our 'Pre- Admission Information Request' outlining documentation we require prior to admission. Alongside documentation essential to meet statutory requirements, we also request relevant court reports, a detailed social and educational history and a chronology of previous placements (including an assessment of their success and/or failure), in order to assist us with decision making and planning.

We invite the child's social worker and other involved professionals to visit Earthsea House to discuss the child with members of the panel. Following this process, if agreed that Earthsea House can meet the needs of the child and the child is an appropriate match for the current group of residents, we will offer a placement. Where appropriate, we will invite parents to visit Earthsea House and meet key staff. This visit may take place prior to the child's move or at a later stage as guided by the social worker who holds knowledge and understanding of the needs of the family.

Each child offered a placement at Earthsea House should possess the sufficient intellectual capacity to enable him or her to respond to our therapeutic approach. We therefore cannot consider any child diagnosed as psychotic or has significant learning disabilities, nor can we consider those who have significant physical disabilities due to the nature of the premises.

### **2.3 Age range, gender and numbers of children**

Earthsea House can accommodate up to 11 boys and girls aged 5-14 years who are unable to live in their own family setting. Children are aged 5-10 years on admission.

### **2.4 Any special needs of children accommodated**

Children who come to Earthsea House have been severely traumatised or psychologically deprived. They therefore have specific individual needs relating to their life experiences and circumstances. Many of the children have suffered the extremes of neglect, physical, emotional and sexual abuse. Their patterns of attachment may be disordered due to interruptions in their early care. Additionally, many are dealing with the consequences of overwhelming events in their lives from which they have been unable to recover. These early experiences have had a severe effect on their ability to

---

function appropriately, both with respect to their own lives and in relating to others.

## **2.5 Range of needs the home are intended to meet**

Children who have suffered in this way often interact with their environments through extremes of fear and anxiety, or over confidence. Some are unable to cope with the demands of almost any new challenge, however small. Others have developed a certainty that any interaction or investment will have a painful outcome. Children who come to Earthsea House are therefore overwhelmed with feelings of worthlessness and low self-esteem, believing themselves to be unlovable and that relationships with others will inevitably fail. They find it difficult to enjoy themselves, play creatively, learn, make friends or share in any group activity. They cause concern in others and while desperate for the reassurance of an adult who will love and care for them, they are unable to trust or to invest in any emotional attachment.

The range of difficulties children may therefore present includes borderline personality disorders, violence towards others, ADHD, eating disorders, self-harm, school refusal, Asperger's Syndrome, oppositional defiance disorders, obsessive or compulsive disorders, alongside a variety of attachment disorders. We may consider children with disabilities and special needs outside the criteria set out above, as long as they meet the criteria for admission and we feel that we can appropriately meet the individual needs of the child. As outlined previously, children with a disability or special needs would need to be capable of engaging in the therapeutic process.

## **2.6 Cultural, linguistic and religious needs**

Earthsea House ensures will ensure we support children in their wishes alongside the wishes of parents and guardians regarding their individual cultural and religious identity. We would however, challenge an understanding of any culture or belief that was disrespectful of others. Staff will support children on an individual basis wishing to maintain a religious observance or attend a religious institution, alongside encouragement to explore and develop their own beliefs. We consider that fostering a child's growth in understanding their world, including their cultural and any religious inheritance is an important aspect of their well-being and we seek to nurture this growth for each individual child. We incorporate individual arrangements into the child's care planning process. In accordance with individual needs, we ensure that suitable quiet areas are facilitated as appropriate, to enable a child the opportunity to practice their religion, for example identifying a space that is suitable for observance religious practices of Islam. We would also seek to ensure we accommodate any specific linguistic needs.

---

## **2.7 Facilities and services**

Earthsea House is a 13 bedroom, detached, purpose-built house with accommodation on two floors. The home is located in a rural setting near the village of Honingham with views to open fields. It is within easy travelling distance of the nearest town Dereham and the city of Norwich. This enables ease of access to resources often found in town and city locations that can support children in meeting their individual needs. We provide education at Earthsea School on site or in a local mainstream or specialist provision, as appropriate to a child's individual needs.

Earthsea House is a spacious home that provides areas for group work as well as allowing for individual space. It provides a warm and friendly environment that is furnished and decorated to a high standard. The home has a fully equipped kitchen and dining room, quiet areas and large recreational areas. Individual sleeping-in rooms with en-suite facilities are provided for therapeutic care staff, two of which are on a sleep-in duty overnight; these rooms are equipped to ensure that staff who are sleeping in are able to rest and relax.

The house is set within spacious grounds incorporating ample lawn areas with a trampoline, sandpit, football pitch and play area consisting of swings, play tower, climbing frame and slide. Children are encouraged to play in the garden with particular emphasis placed on resourcing children's play activities in the community. Additionally, there is a large vegetable garden maintained by staff with which the children are encouraged to help.

## **2.8 Accommodation and room sharing**

Earthsea House has a warm family home feel with good accommodation and spacious grounds. Each child has their own bedroom; there is no room sharing. Children will be consulted in relation to furnishings and décor within the home and particular attention is paid to how and where their personal belongings are kept. All furnishings and fittings conform to health and safety regulations.

Each bedroom is the child's own personal and private space. Staff respect the child's right to privacy; however, there are times when staff will enter the child's bedroom, for example when invited by the child, to tidy/clean or if there are immediate concerns for the child's safety. All bedrooms are furnished and decorated to a high standard taking into account the individual needs of the children. During their placement at Earthsea House, children are encouraged to personalise their rooms according to their wishes and feelings; this will include observance of diversity and recognition of the child's history, cultural and religious backgrounds and their developing sense of individual identity. Each child has a lockable bedside cabinet solely for their use. They will be given a key

---

for their cabinet and the spare key is kept in a locked cupboard in the staff office.

## **2.9 Suitability of location**

Earthsea House is located on the outskirts of the small village of Honingham in Norfolk. The house and grounds are spacious and very well maintained; the house is set back from Berry's Lane with a gated driveway and surrounded by large grounds. Within the grounds is Earthsea School, which is part of the Short Stay School for Norfolk Academy Trust. Earthsea School is located primarily to serve the educational needs of the residents of Earthsea House and the school and home share a very close working partnership. The home has woodland and fields on two sides, roads border the other two, (Berry's Lane and Mattishall Road). The house was specifically designed to ensure a suitability for the function of accommodating young children and achieving the home's aims and objectives.

We undertake an annual full review of our Location Assessment. This involves consulting with a number of local organisations in relation to potential risks within the locality, in particular risks relating to safeguarding, child sexual exploitation and child criminal exploitation. We also incorporate the views of children and staff on the suitability of the location. To date, the Location Assessment has not established any risks not largely mitigated by the high supervision levels children receive at Earthsea House. We are satisfied that the location of Earthsea House is suitable for our purpose, both in relation to minimal risks within the locality and in relation to the diverse range of leisure opportunities easily accessible from our location.

## **3. Treatment and therapeutic approach**

### **3.1 Specific therapeutic techniques used in the home**

At Earthsea, we offer an integrated programme of care, treatment and education based on psychodynamic and systemic principles. Our document 'Integrated Systemic Therapy for Traumatized Children and Young People' describes in detail the framework and range of groups and facilitators used to support this therapeutic methodology. We regard all aspects of the programme as part of an overall living/learning experience, from structured education and small discussion groups, through to informal trips out, interacting with peers and staff, spending time with a keyworker or playing in the grounds. Each child who lives at Earthsea House is given the opportunity to participate in a wide range of activities in both individual and group situations that will challenge all that they have experienced in the past.

There are many ways the key elements of the 'treatment process' offered by our community could be described. It is the integration of the care, treatment and

---

education offered which constitutes the totality of what we feel is necessary for the successful development of each individual child. It is through the interaction of each individual with the social and physical environment of the community that the experiential and cognitive levels of the treatment process occur. It is our belief that real psychological change can only be facilitated through addressing the early life trauma experienced and redressing the emotional and psychological imbalances that have occurred as a result of their early years. We endeavour to create a social and physical environment that will create a sense of hope from the moment a child first arrives, something different to what they have experienced before. This provides each child with the possibility of an experience that will challenge their conscious and unconscious assumptions about themselves and their associated expectations of others. We aim to strive continuously to create an environment in which each child will have a compensatory primary experience. This may go some way to redressing the imbalance of their experiences.

Our treatment model enables us to keep detailed records that inform individual placement plans outlining how each child's needs will be met within the community. Monitoring processes are in place to ensure plans are fit for purpose for each child and accurately reflect their individuality as well as their ability to function within the group. Incorporated into the iST treatment model is a comprehensive and robust assessment framework: Assessment, Planning, Treatment and Transition (APTT). In addition to this, there is ongoing monitoring, evaluation and measuring of outcomes for the children and the service provided.

### **3.2 The group environment**

Over the last 25 years, outcomes from Earthsea House and other Childhood First communities demonstrate that the wide mix of children and larger group experience we offer presents significant opportunities to the traumatised children who come to us, they would be unlikely to find these opportunities in a smaller less group-oriented setting. The peer group is an essential element of our treatment model and group living is what makes a placement at Earthsea House an effective form of treatment for the children with which we care. Children who live at Earthsea House have suffered damage within their relationships with adults in the past and through their experience of adults' relationships with one another. The consequence of this is that the children find themselves unable to relate to others in a healthy and productive way.

The group environment offers three channels for repairing these relational problems. These are inextricably linked through a programme of supervision and consultancy. Firstly, the staff team works together in a way designed to offer children healthy experiences of adult interactions and new forms of dialogue. Secondly, staff receive clinical supervision in relation to their management of the children, including the impact

---

on themselves of working with the children. They are encouraged in this forum to link their personal experiences with the impact of the work, so that they can make this emotional material available to work on within the staff group. This enables fruitful exploration for the children of their impact on others, both peers and staff. Thirdly, formal and informal groups with the children concentrate on their communications and relationships with staff and with one another.

Throughout the process of psychotherapeutic change, we offer children the opportunity to learn new skills and acquire knowledge of the world outside their own emotional spheres and immediate preoccupations. The aim is for the children to develop and eventually become age appropriately responsible for their own lives in a practical as well as a psychological sense. The work undertaken at Earthsea House focuses on each child's emotional development and helping them to understand the feelings that lead to destructive and anti-social behaviour. This takes place in a variety of group settings including the weekly community meeting, and individually with the child through the provision of 1-1 relationships and experiences with staff, as well as through a child's individual therapy sessions.

For some children the severity of the abuse experienced within a family environment severely impedes their capacity to function in similar settings. Many children who come to Earthsea House have experienced multiple foster placement breakdowns that we are anxious not to repeat. For a significant proportion of children placed at Earthsea House, we aim to equip them with the internal emotional resources to enable them to eventually return to live in a family setting, either with their birth family (in line with their individual care plan) or with a foster family. For some children, returning to a family setting of any sort would be damaging for them and further residential care is sometimes the best option for them when moving on from Earthsea House.

### **3.3 Children's groups**

In addition to a community meeting twice each week, we offer the children an opportunity to participate in a smaller weekly group facilitated by an Assistant Director. This group focuses on sensory and creative exploration, whilst incorporating some Theraplay® activities as appropriate, thereby providing children with the opportunity for creative expression within the context of a smaller group and alongside their peers.

### **3.4 Individual Psychotherapy**

In order to address some of the difficulties that the children face and to assist the healing process, Earthsea House offers children the opportunity of having individual psychotherapy sessions. The model of psychotherapy offered is psychoanalytic, with children being seen

---

either once or twice weekly for regular, on-going sessions. Therapy is offered for a minimum of a year but often longer.

Following a period of settling in at Earthsea House and in discussion with a child's local authority, we arrange an psychotherapy assessment consisting of three weekly sessions followed by a meeting between the Child Therapist, the child's social worker and a member of the senior management team. They discuss and assess whether commencing psychotherapy is in line with the child's needs. If psychotherapy does start, regular reports are included in the child's LAC Review and the psychotherapist is available to discuss the child's progress where necessary.

### **3.5 Evaluation of the placement**

Childhood First belongs to the CAMHS Outcome Research Consortium (CORC) and Earthsea House and our staff conduct standardised measures (questionnaires).

- CGAS - Children's Global Assessment Scale
- Strengths and Difficulties Questionnaires
- Goal-Based Measure
- Experience of Service Questionnaire (CHI-ESQ)

Assessments are conducted every six months. The information will be accessed in line with data protection guidance and the Childhood First Confidential Reporting Policy (this is available within the Childhood First Procedures Manual on Tri-X: <https://childhoodfirst.proceduresonline.com/contents.html>). In addition, we utilise a tailor-made questionnaire cross-referenced with Ofsted's domains for evaluating outcomes for children, to ascertain children's opinions about the impact of the Childhood First community upon them.

This work is overseen by the Institute of iST Clinical Institute Director. Where appropriate each child placed at Earthsea will receive a psychotherapeutic and education assessment. This shapes the work and ensures a baseline to enable us to demonstrate progress and improvement for the child. Any concerns that arise would be investigated and further assessments requested, e.g. an educational psychologist assessment, a sensory integration assessment. The psychotherapeutic assessment and CORC data enables all staff to be aware of the child's state of mind and informs their placement plan, risk assessment, behaviour management plan and their interactions with the child.

In addition, we consult regularly with parents and family members via a questionnaire sent prior to the child's six-monthly LAC Review meetings. We consult with social workers, social work team managers, independent reviewing officers, schools and other

---

relevant stakeholders via feedback questionnaires twice a year. This facilitates the continuous evaluation and improvement of our practice across all areas. Additionally, we consult with children via annual Earthsea House questionnaires, collating their views on all aspects of their care.

#### **4. Incorporating Children's Views, Wishes and Feelings**

Earthsea House staff listen attentively to children's wishes and feelings. Children can help make decisions about how they want to be looked after and how things should be within the home. Children can let staff know about their wishes and feelings by talking to any staff member, talking in community meetings or using children's 'I want you to know' forms. They can also ask staff to talk in staff meetings about the things that are important for them individually.

Each child's right to be listened to by others is paramount. Staff are therefore highly skilled in responding to children's individual wishes and feelings, whether communicated verbally or in more subtle ways. We evidence this via the attuned relationships that staff develop with the children. The children and their social workers complete an 'experience of service' questionnaire every six months that enables us to monitor and develop the quality of service that we provide.

##### **4.1 Consultation with children about the operation of the home and the quality of their care**

In keeping with our therapeutic approach, the culture of Earthsea House is established on a basis of listening, valuing and thinking with the children. Children are encouraged and supported in expressing their thoughts and feelings regarding all aspects of their lives and experiences at Earthsea House and the quality of care they receive. Views are sought within the culture of the day-to-day life within the community. These inform decisions in relation to their care as individuals and as a group.

We hold a formal Community Meeting once a week (every Tuesday) for all children and therapeutic care staff. In addition, we hold a smaller meeting (Thursday) which includes all the children and staff on duty that day. These meetings are a central part of our therapeutic model and provide a forum to discuss with the children plans for the forthcoming days, any visitors to the home, any concerns, etc. These meetings facilitate an experience for each child of being listened to by staff and peers. Children are given the opportunity to share their opinions on any topics relating to the home or their placement within the home. These meetings also provide an opportunity for children to reflect on their own personal experiences in a supportive environment and talk about these if they choose to, alongside receiving peer group support with areas of difficulty.

---

Children or staff can request further meetings at any time to address an issue that they feel may be undermining the wellbeing of the community or any individual within it. Children are supported to reflect on their behaviours, receiving support from staff and peers to encourage less negative ways of expressing difficult emotions. Such conversations support children in reflecting on any difficulties experienced in their relationships with one another, highlighting ways in which these can be resolved.

In keeping with our treatment methodology, children at Earthsea House are enabled to participate in all aspects of their lives and to consciously contribute to activities, daily groups, discussion and as appropriate, decision making and complaints. We actively maintain a culture of openness where all opinions are heard and children are valued and respected by staff and they are helped to value and respect one another and themselves. This programme of group and individual work helps children build on their strengths and identify areas of difficulty.

These systems promote and encourage open communication about all aspects of the children's lives including everyday living together. Children are encouraged to raise concerns and make suggestions for changes and improvements. Staff encourage, listen and respond to both minor and major complaints and are trained and experienced in remaining alert to children's welfare at all times. The children at Earthsea House are young and severely traumatised; in line with good parenting, it is therefore essential that staff know when it is helpful for children to be consulted and when it is more appropriate to make decisions in their best interests.

Children are encouraged to engage in the process of developing a child friendly version of the Placement Plan, as appropriate to their age and level of understanding. This outlines the care they require throughout each day and identifies areas where they need support from staff, as well as areas where they may have made progress with reducing a negative behaviour or may have developed increased levels of confidence or independence. Additionally, we consult with children via annual Earthsea House questionnaires, collating their views on all aspects of their care to inform our practice.

## **4.2 Equality and diversity**

Earthsea House is committed to equality, diversity and children's rights. Children are treated with dignity and respect at all times. Staff demonstrate the principles of dignity and respect for others through their professional relationships, offering good role models for children in their care. Overtime this enables children to develop a positive view of self and to develop emotional resilience, alongside knowledge and understanding of their background. Staff aim to mitigate and repair the effects of stereotyping and discrimination on the grounds of ethnicity, age, gender, level of ability or understanding or any other area. Staff are proactive in making sure that neither the

---

children nor others are ever treated unfairly.

The promotion of equality and diversity is intrinsic within the culture of the community at Earthsea House, incorporating acceptance and understanding across all protected characteristics (as defined within the Equality Act 2010) and individual differences. Staff actively promote a culture of openness and acceptance within the day-to-day life of the community; this includes role modelling in a parental manner, being open-minded and appropriately challenging others where there may be differences in attitudes. This is consistent both in 1-1 work with the children and within the group as a whole. Children are encouraged to develop close relationships with staff over time where they feel safe to explore their personal beliefs, views, values and attitudes. These relationships also provide a forum for children to be appropriately challenged and supported with their attitudes or behaviours where necessary.

Ensuring each child's individual needs are met is part of the planning process prior to the child's placement at Earthsea House. This is reviewed in consultation with the child and others where appropriate, to ensure the child feels safe in the knowledge that their individuality is embraced and supported. We strive to help children discover and appreciate their unique qualities, whilst also learning to value the unique qualities of others. Prior to the admission of a child with specific needs such as cultural, religious, language, identity, ethnic, racial or other specific needs, we endeavour to ensure the resources within the home are sufficient to accommodate these needs, alongside researching local cultural groups or places of worship as appropriate should the child wish to access these at any point. We add significant consideration to the impact of moving to the Norfolk countryside and support many children with adjusting to a different area, for example moving from an ethnically diverse major city.

Whilst we appreciate the importance of ensuring we are adequately prepared to meet a child's specific needs, we work to ensure that the details of their care and treatment at Earthsea House are determined by their needs as a child foremost and in line with their individual wishes and feelings. We access support from partners where appropriate to ensure the child's needs are met. For example, if a child or their family members did not have English as a first language we would access local translation services in consultation with the placing authority and we would expect this to be assessed in the overall care planning for the child.

We regularly mark a culturally diverse range of festivals and celebrations through themed activity evenings linked with the experience of new foods. This helps the children to develop an understanding and appreciation of a diverse range of cultures alongside traditional UK celebrations.

---

### **4.3 Anti-discriminatory practice**

Every effort is made to ensure that Earthsea House is welcoming to all children, their families and others significant in their care and well-being. The Registered Manager monitors the range of children placed within the community in terms of ethnicity, gender and disability, to ensure the service provision is reaching all and not creating barriers to particular groups. Children are offered opportunities to try out new experiences, which are not restricted by traditional gender options. Children have the right to express their views freely in all matters affecting themselves and we expect staff to challenge attitudes, behaviour and language that may be non-inclusive or discriminatory, in a positive way.

### **4.4 Children's rights**

Children are encouraged and supported to understand their rights and ways of challenging any form of discrimination. Children are enabled to express their views about the services and if necessary to be supported by an independent person should they wish to complain e.g. an independent advocate. Children have access to telephone numbers for a range of relevant organisations/roles including ChildLine, Police, Office of the Children's Rights Director, Ofsted and the Children's Complaints Officer for their local authority; this information is stored near the children's telephone.

## **5. Education**

Our therapeutic model IST considers that alongside care and treatment it is essential that children receive education which is similarly adapted to their emotional state and which can deliver the best possible educational outcomes for each individual child. Throughout the duration of each child's placement we aim to help them 'catch up' educationally, as far as possible. We aim to help each child achieve as much as their abilities and time permit, while helping them achieve a true sense of worth and celebrating their achievements with them. Staff offer close support whilst children complete their homework and a variety of separate, quiet spaces within the house are available for this purpose; they are also encouraged to visit the library and access online learning resources.

We work closely with Earthsea School that is part of the Short Stay School for Norfolk Academy. Based within the grounds Earthsea School provides excellent education for Key Stage 1 and 2 children, a mixture of Earthsea House residents and day pupils. Earthsea School offers the full national curriculum in small groups allowing individual attention for each child and the opportunity for each child to reach their full potential. Children are able to attend Earthsea School or local mainstream or specialist schools according to their individual needs. We are committed to working in partnership with each child's school and with their social worker to ensure individual educational needs

---

are met. We have excellent relationships with local schools that enable us to advocate and negotiate for a child to enter/maintain mainstream schooling with support as necessary. We are committed to liaising closely with schools in relation to supporting children's individual educational needs and enabling all children to progress from their individual starting points. Therapeutic care staff will be regularly informed about a child's educational progress and work in partnership with schools and social workers to meet each child's specific needs. Staff attend school events and open evenings to take an interest in all aspects of school life. Additionally, school staff are regularly invited to participate in children's LAC Reviews and planning meetings.

### **5.1 Special educational needs**

When placed at Earthsea House, particular attention is paid to a child's educational needs, whether they can be maintained in mainstream education with or without a teaching assistant, or whether they have an Education Health and Care Plan (EHCP) that in turn contributes to the overall planning for the child. The child's keyworker or another member of staff attends the child's PEP and EHCP review meetings as well as attending parents/carers meetings as appropriate.

### **5.2 The education structure**

All of the children at Earthsea House are supported to attend full time education regardless of their age. Whilst for some this is based at Earthsea School on site, others attend local schools as appropriate to their individual needs. We are pro-active in responding to non-attendance and planning supported re-integration following any period of absence. If a child refuses school, we actively try to engage them in reflective conversation about the reasons behind their refusal, whilst holding in mind the emotional impact of their experiences and current life circumstances on their ability to consistently attend and engage with education. Communication with each child's school plays an important role in helping them to understand the child's needs and how best to engage them in school and in learning. If non-attendance becomes a persistent problem, we work closely with the child's school to develop interests that will help to re-engage the child; this may also include a telephone consultation or visits from an Attendance Officer.

## **6. Enjoyment and Achievement**

### **6.1 Children's participation in cultural, recreational and sporting activities**

Cultural, recreational and sporting activities form important building blocks in a child's life. Children benefit enormously from individual and group activities in terms of social interaction with their peers and building their individual self-esteem. Children living at Earthsea House are actively encouraged to experience a variety of activities and once

---

settled in the home are encouraged in choosing to follow a hobby or activity for which they have a special aptitude or interest. Children are encouraged to pursue external hobbies and interests in line with their wishes and feelings and as appropriate to their individual stage of readiness for increased social engagement. Attending clubs or activities provides children with opportunities to develop their sense of identity alongside the opportunity to relate socially with peers. This enables links to the local community and provides the opportunity to develop relationships outside of the home that can also support children through their transitions. Where children make friends through these activities whom they wish to invite to Earthsea House or they are invited to their homes, careful consideration is given and fully supported where appropriate.

There is a wide range of clubs and activities available locally that would facilitate the development of children's creative, intellectual, physical and social interests and skills. These include horse riding, dance classes, swimming, gymnastics, canoeing, fishing, roller-skating, football, hockey and drama groups, as well as more community-based activities such as Cubs, Scouts, Brownies and Guides. There are also opportunities for group excursions to places of interest and activity parks. Whatever the activity, children are supervised by appropriately trained staff. Group activities are planned through conversations between staff and children ensuring that plans benefit each child. Cultural activities as outlined previously are supported on an individual, needs led basis; however, we also offer group activities to support all children in their understanding of difference, such as the celebration of a variety of cultures and religions.

## **7. Health**

Although particular significance is given to a child's emotional health throughout their placement at Earthsea House, we believe a child's physical well-being is equally important. Each child who comes to Earthsea House is registered with our local GP surgery where the health professionals have a good understanding of our work and of the experiences of the children. If a child wishes to be seen specifically by a female or male GP this is respected and facilitated. Children are also registered with local dental and ophthalmic practices. Where appropriate we work in partnership with other professionals in ensuring that each child's needs are met as identified in their Education Health and Care Plan (EHCP). There are close links with the LAC professionals in the area and individual programmes are discussed as and when required with both the child and others as appropriate. We ensure each child has an annual LAC Health Assessment, alongside regular dental and optician check-ups. We support children to attend additional health appointments and consultations as appropriate. Where appropriate, children are consulted and can contribute to their health plans.

We follow written procedures relating to the storage, rotation, administration, recording and disposal of medication, both prescribed medication and non-prescribed 'homely

---

remedies'. All care staff receive medication training to ensure administration and storage of medication is in line with best practice guidance. Where appropriate some children may on occasion self-administer some medications; this decision is based on a range of factors and is reviewed on a regular basis.

The children are encouraged to discuss openly all aspects of their health and well-being, while their right to privacy and confidentiality is respected. Support and education in relation to wider health education issues is offered on a 1-1 basis or in small groups according to the child's age and stage of readiness for this input; for example, sex and relationships education, smoking, alcohol and substance misuse.

## **7.1 Exercise**

Every child is encouraged to take exercise in a way they will enjoy. Staff are available to join in with and organise informal games and sports within the home. There is a wide range of informal and formal opportunities to exercise including individual activities (e.g. walking, bike-riding, swimming), group games (e.g. football, tag) and organised classes and team sports (e.g. dance, football, Park Run) through to pursuing more specialist hobbies like horse riding. These activities are provided for their physical health benefits as well as their contribution to the children's emotional development and well-being.

Relaxing, resting and being able to sleep well are essential elements of children's lives and part of our treatment programme aims to help children use opportunities to rest and relax, giving their minds and bodies opportunity for quiet and replenishment. All children are supported at bedtimes with 1-1 attention according to their individual needs. Earthsea House staff work with children to find the best ways to enable them to make the transition into sleep and to being on their own at this time of day.

## **7.2 Diet**

Eating well has a critical impact on physical health. All children are provided with a balanced diet and are helped to develop healthy eating patterns and an understanding of healthy eating. Children are encouraged to become involved with menu planning, the preparation of meals and engage in conversations about their food preferences and the food provided. Children's individual choices are incorporated into each weekly menu and helping to prepare and cook food is part of their experience of day-to-day living within the community. The provision of good food and the ability to accept it is recognised for its contribution to children's development, identity and emotional health; attention to detail in relation to food preparation is therefore essential. A paediatric dietician provides consultation for the staff team in relation to provision within the home and meeting children's individual needs, she also delivers cooking, tasting and activity sessions directly with the children.

---

Children are supported to attend group meal times as a social occasion; individual preferences are attended to, cultural differences in food are incorporated and celebrated and all children are encouraged to try different foods in gaining experiences of a range of cultures. Throughout the year we hold a variety of themed evenings celebrating different cultures and faiths, food is a central part of these experiences. Children with specific dietary requirements (e.g. food allergies/intolerances, religious requirements) are supported through their individual plans and in consultation with health professionals as appropriate.

### **7.3 Smoking**

There is a non-smoking policy for children, staff and visitors on our premises. This includes e-cigarettes.

### **7.4 Alcohol, drugs and illegal substances**

No form of alcohol is allowed on our premises. No recreational drugs or other illegal substances are allowed on the premises.

## **8. Positive Relationships**

The creation of positive relationships is central to our therapeutic approach. Children are supported to develop an understanding of the impact of their behaviour on others and to express their feelings about the behaviour of others. High levels of supervision and guidance are offered to encourage behaviour and relationships that have a beneficial impact for each child and for the group. Achievements and participation are celebrated and rewarded. Where behaviour is unacceptable or has a destructive impact, it is responded to with consistency and clarity within the context of understanding the individual child's history and within the context of the group dynamic.

Relationships between staff and children at Earthsea House are based on honesty, mutual respect and understanding. The staff team is expected to maintain clear, safe, consistent and understanding boundaries for the children. Rewards and sanctions are part of the mechanisms for care and control; these are used within the context of thoughtful relationships. The management team will closely monitor any rewards and sanctions to ensure they are proportionate and appropriate to the needs of the individual child.

### **8.1 Contact between children and parents, relatives and friends**

It is our policy to work in partnership and facilitate positive contact for each child with

---

their family and significant others who have been important in their past. Throughout each child's placement at Earthsea, we therefore encourage and facilitate contact with family and friends wherever possible and appropriate. For children with little or no family contact we work with their local authority in identifying significant external contacts such as an independent visitor. Contact with parents, families and significant others is arranged in consultation with the child's social worker and in accordance with the child's Local Authority Care Plan. We endeavour to foster a normal home environment for the children who live at Earthsea House, including promoting positive friendships within their peer group. Children are encouraged to invite friends to visit and to visit friends within their own homes where appropriate.

We have three Placement and Family Support Workers who work directly with the children's families, seeking to provide supportive relationships with their parents and other family members. This role facilitates well-supported and positive experiences of regular family contact for the children wherever possible. Our Placement and Family Support Workers seek to help family members in developing their understanding of themselves and the events that led to their child coming into care, ultimately better equipping them to be able to relate to their child in the present and in the future. Through working closely to support families and working in partnership with the professional network and placing authorities, a number of former residents have been able to live within their own or another family setting following their placement at Earthsea House.

## **8.2 Working in partnership**

Relationships form the basis of all areas of our work and we are committed to working in partnership with others involved in children's lives in order to achieve the best possible outcomes for the children. We strive to work in effective partnership with local authorities, social workers, IRO's, families, health professionals, CAMHS Teams, independent visitors, advocates, local Safeguarding Partners and other professionals as appropriate to the needs and best interests of each child. We consult every 6 months with those we work in partnership with, seeking feedback on their experience of working with us and identifying potential areas for improvement.

## **9. Protection of Children**

### **9.1 Promoting appropriate behaviour, control, physical intervention and discipline**

We believe the foundation to achieving our therapeutic task at Earthsea House is the fostering of positive relationships between staff and children within a clearly defined set of boundaries. We aim to establish good and appropriately professional, interpersonal relationships between staff and children. These relationships provide a sense of

---

containment for children, through a consistent but appropriately flexible understanding of the many different situations they must manage on a daily basis, underpinned by a sense of genuine personal concern and commitment to each child.

Children placed at Earthsea House are severely emotionally traumatised by their experiences and have significant difficulties in relating to others. They therefore display negative, unkind, destructive and aggressive behaviours at times, especially when their feelings become overwhelming for them. The histories of the children we care for are such that the focus of their personal development is inevitably taken up through the interplay of their past conflict and trauma within the present. Crossing boundaries within the community is an inevitable part of the work with the children, while they struggle to begin to establish a more trusting and co-operative partnership with those around them. Through iST we seek to view all children's behaviour as communication, over time using this to aid their development of a greater understanding of themselves, of their past experiences and of their day to day thoughts and feelings. We support children to manage their challenging behaviours and in time develop appropriate ways of communicating their feelings to others.

The management of difficulties resulting from negative behaviour is often the focus of small groups, 1-1 discussions with keyworkers or other staff and community meetings. Children are encouraged and supported in raising their concerns. Each child is helped towards a sharing of the responsibility for group and individual wellbeing and is supported in verbalising their feelings and listening respectfully to others. Acknowledgement and understanding are generally the main aim of this task, but occasionally a sanction may be included as part of an appropriate response. Where a sanction has been given there will often be opportunity for children to reduce or indeed lift the sanction dependent on the individual circumstances, enabling a positive outcome for the child. We are proactive in planning rewards and incentives, thereby helping children have positive experiences to work towards, while trying to encourage positive reinforcement and discourage negative behaviours.

Individual risk assessments enable staff to make informed judgements, in conjunction with each child's individual behaviour management plan that details the methods of control used and states the preferred method for each child as appropriate. When there are concerns about an individual child, our risk assessment process allows a systematic process of assessing risk, determining strategy and informing practice around a child to contain the situation. Our care and control (behaviour management) policy can be accessed online via the Childhood First Procedures Manual.

## **9.2 Restrictive physical intervention**

Restrictive physical intervention is permitted only in circumstances when a child may be

---

intent on causing harm to him/herself or to another person, or when causing serious damage to the property of any person (including the child). In all cases where a restrictive physical intervention occurs the restraint must be necessary and proportionate, staff should use minimum necessary force and place an emphasis on the sense of being held not punished and in being looked after, not humiliated. It is emphasised that a child should be held only for the time that it takes them to regain inner control. Our physical intervention procedure can be accessed online via the Childhood First Procedures Manual.

Our Therapeutic Care Staff are trained in restrictive physical intervention, CPI safety intervention. We have in house CPI trainers who are certified by Crisis Prevention Institute to deliver this training. A training manual including descriptions of each of the physical interventions is available in the office for reference. Restrictive physical intervention is permitted only in circumstances when a young person may be intent on causing harm to him/herself or to another person, or when causing serious damage to property. A restrictive physical intervention will only be used as a last resort. When efforts to de-escalate the situation have been exhausted and the young person is continuing to display risk behaviour.

Children who have suffered traumatic early life experiences often display violence, self-harm or damage of property as a way of communicating their distress. We find that some children go through periods of time whilst living at Earthsea House when they are involved in a number of incidents of violence towards others which often necessitates restrictive physical intervention. For most children the relationships they develop with staff at Earthsea are their first experience of safe relationships with adults and therefore children will at times communicate extreme emotions associated with their early life experiences through their behaviour towards these trusted adults. Over time, children are helped to learn to communicate these feelings in a more appropriate manner.

Following an incident where restrictive physical intervention has been used the child and staff involved will always be given the opportunity to share their views and are supported to reflect on how a similar incident could be avoided in the future. Children and staff are also offered the opportunity to see a medical professional following every restraint. We monitor levels of physical intervention through weekly restraint and serious incident review meetings and thorough monthly management analysis of restrictive physical interventions and serious incidents. These meetings guide our practice in relation to how best to avoid the need for restrictive physical intervention with each individual child. Staff closely analyse each incident and adjust risk assessments and behaviour management strategies within individual placement plans accordingly.

---

### **9.3 Rewards and incentives**

Rewards for thoughtful and acceptable behaviour are most often in the form of praise and encouragement within individual conversations and within group forums. We reflect this in the child's Day Notes, Daily Log and the Community Meeting minutes. Contribution to and participation in the group overall is noticed and encouraged. We notice and praise small achievements in the context of children's individual areas of difficulty rather than relative to each other.

We are proactive in planning incentives to help children have positive experiences to aim for each week, thereby encouraging positive reinforcement and discouraging negative behaviours, alongside helping children to measure their progress. We use many positive rewards and incentives and these are recorded in each child's placement plan. These are highly individual according to the child's preferences and motivations, alongside their age, stage of development and level of understanding. We believe that positive incentives are effective in helping to motivate children in working towards individually identified areas of development and supporting the development of self-esteem.

### **9.4 Sanctions**

Where patterns of persistent negative behaviour become apparent for any individual child or combination of children, we support them to change these patterns over time through combining supportive reflection with staff they share close relationships with, positive incentives to help motivate them to work towards behavioural goals and occasional sanctions as appropriate. Responses to individual children's negative behaviour are carefully considered by the staff team who offer children supportive alternatives to negative behaviour and the opportunity to reflect on the impact of their behaviour on others, as appropriate to their age and level of understanding.

Sanctions are used as part of establishing positive relationships with children to maintain boundaries and control. They are used to engender the concept of restitution and reparation, encouraging the notion that mistakes or 'wrong doing' can be repaired and things (including people) can be 'made better'. The sanctions imposed are usually seen as being related to a particular incident, particularly if an acknowledgement of the consequence of a particular behaviour is not possible in an alternative way. We endeavour to ensure all sanctions adequately reflect the unacceptable behaviour, are varied and effective, and are decided following discussion within the staff team. Managing group and communal boundaries within the community is normally seen as a precursor to providing an appropriate guarantee to managing group outings from the community and a 'grounding' may follow a serious incident, however a grounding does not apply to any health, educational or family visits. Pocket money fines are rarely used

---

at Earthsea and only in the context of reparative payment in relation to damage for which they are held responsible. Children are invited to share their views following a sanction.

The following are Permissible Sanctions:

- Restitution: 'making good' or reparation to individuals for the consequences of unacceptable actions or damaged caused. A proportion of pocket money may be withheld to facilitate this.
- Reparation e.g. by helping to repair damage
- The curtailment of leisure activities
- Grounding

### **9.5 Prohibited methods of control**

None of the disciplinary measures prohibited under Regulation 8 of the Children Act 1989 have ever been permitted at Earthsea House. In line with the Children's Homes Regulations (2015) no measure of control or discipline that is excessive or unreasonable may be used, specifically the following measures may not be used to discipline any child:

- Any form of corporal punishment
- Any punishment involving the consumption or deprivation of food or drink
- Any restriction, other than one imposed by a court or in accordance with Regulation 22 (contact and access to communications), on:
  - a child's contact with parents, relatives or friends
  - visits to the child by the child's parents, relatives or friends
  - a child's communications with any persons listed in regulation 22(1) (contact and access to communications)
  - a child's access to any internet-based or telephone helpline providing counselling for children
- The use or withholding of medication, or medical or dental treatment
- The intentional deprivation of sleep
- Imposing a financial penalty, other than a requirement for the payment of a reasonable sum (which may be by instalments) by way of reparation
- Any intimate physical examination
- Withholding any aids or equipment needed by a disabled child
- Any measure involving a child imposing any measure against another child
- Any measure involving punishing a group of children for the behaviour of an individual child.

---

## **9.6 Deprivation of liberty**

By the nature of our work at Childhood First in providing a service to psychologically traumatised children, we may on occasion adopt practice that could constitute a restriction or deprivation of liberty (The Law Society) such as the physical restraint of children and increased monitoring and supervision that would be normal and good practice in a range of circumstances. Failure to monitor and supervise children dependent on their age, understanding and vulnerability would be negligent.

The best interests of children are best protected by open, transparent and honest practice therefore individual practice with children will be undertaken in consultation with placing authorities and where appropriate with children and their families. All interventions with children including any practice that may constitute deprivation or restriction of liberty will be subject to regular review and consultation with the placing authority to ensure legal permission is sought if required.

## **9.7 Surveillance within the home**

There is a buzzer system which alerts sleeping-in staff if any bedroom door is opened at night. This is in place to provide safeguards for children and its use is assessed on an individual basis as outlined in each child's Placement Plan. The system does not prevent children from leaving their bedrooms; it enables staff to respond to a child in need during night time hours as well as alerting staff to a child trying to access other rooms or leave the building etc. We seek consent from each child's placing authority and/or parents in accordance with their legal status. The buzzer system is explained to the child upon their arrival, as appropriate to their age and level of understanding, emphasising that the system means a member of staff will always be available to them at night if they need somebody. The buzzer system also alerts sleeping-in staff if the upstairs corridor doors are opened to further ensure the children's safety and well-being overnight. The Assistant Director for Statutory Compliance will regularly monitor any overnight activity registered on the system. They will feed back any issues to senior management.

Childhood First uses an IT surveillance system called 'Securus', this enables senior management to pick up key words that staff or children input into the Childhood First system through emails, reports, search engines etc. We additionally utilise an application on children's electronic devices and consoles that filters inappropriate content and allows restriction and monitoring of internet usage as appropriate.

## **9.8 Fire precautions and emergency procedures**

Earthsea House has written statements in relation to fire precautions and evacuation

---

procedures. These are known to both children and staff and are reinforced by regular recorded fire drills. Our Fire Safety Policy outlines responsibilities, recordings, drills, procedures, training, and assembly points. Staff are aware of our health and safety policy and risk assessments are regularly reviewed, these cover all aspects of the home and specified excursions external to the home. Earthsea has a Continuity Plan that we would employ in the event of an emergency.

## **10. Safeguarding and Child Protection**

Childhood First is committed at every level to safeguarding and child protection in order to promote children's welfare. We take seriously our duty to protect every child from abuse and maltreatment and to prevent impairment of health or development. Our Safeguarding and Child Protection policy is available in the home and can be accessed via the Childhood First Procedures Manual. We are committed to interagency working, actively maintaining good working relationships with our local Safeguarding Partners, the Norfolk LADO Team and LADO teams from other local authorities as required. Child Protection concerns will be managed, and where appropriate, referred by the Registered Manager (Designated Safeguarding Lead). In his absence, the Assistant Director Statutory Compliance (Deputy Designated Safeguarding Lead) would refer to the appropriate local authority. In any circumstances where safeguarding procedures are undertaken, the child's social worker and parents (where appropriate) will be kept closely involved and informed as outline with the document 'Working Together to Safeguard Children' (2018).

On admission, comprehensive risk assessments undertaken for each child covers all aspects of safeguarding. This is reviewed regularly, or immediately if the need arises, to ensure that any new behaviours or historical information disclosed can be factored into our response in the safeguarding of the child. All staff receive annual safeguarding training, together with support and guidance in safeguarding and promoting children's welfare whenever required. Additional safeguarding training is implemented when appropriate or when linked to a specific area such as, criminal exploitation, child sexual exploitation or internet safety.

### **10.1 Preventing bullying**

Earthsea House does not tolerate any form of bullying and is committed to developing a culture within which all individuals are supported in confronting both being bullied and the potential to become a bully. We employ a restorative approach in relation to incidences of bullying or unkindness wherever possible, seeking to help the children develop a greater understanding of themselves and of the impact their actions can have on others. We encourage children to be assertive in response to bullying and to make staff aware of any interactions that have left them feeling upset.

---

We strive to create and maintain an environment where children are treated with dignity and respect at all times. Staff remain continuously vigilant for signs of bullying and any concerns are brought to the attention of the Registered Manager and other senior staff. There is a clear system in place for reporting, tracking and responding to incidences of bullying or suspected bullying behaviours. This is monitored by the Registered Manager and is also reviewed in weekly staff business meetings. If bullying occurs, the children involved will be encouraged and supported in expressing their concerns through open communication, this could be either in the community meeting or in conversation with a member of staff. All children are aware of where they can find information regarding appropriate external contacts e.g. their social worker, ChildLine, local authority children's rights/complaints officers or Ofsted.

### **10.2 Child sexual exploitation (CSE)**

Staff receive regular training in the risks associated with child sexual exploitation. This training highlights the vulnerability of our children's group and potential behavioural indicators of a child being 'groomed' or exploited. The management team ensure the assessment of associated risks is integrated within each child's individual risk assessments, e.g. arrangements for taking children to/from mainstream schools, arrangements enabling older children to have planned independent time off site. Staff seek to remain continually vigilant to potential indicators of child sexual exploitation. The close partnership working ethos within the staff team, alongside the expectation for open communication in relation to all areas of caring for the children helps to minimise the risk of exploitation from within the home.

A thorough Location Assessment is reviewed annually, this has consistently established that the location of Earthsea House is suitable for the purpose of residential therapeutic childcare and additionally that the high supervision levels of the children at Earthsea House minimises risks associated with our location.

### **10.3 Child criminal exploitation (CCE)**

Staff have an awareness of child criminal exploitation, also known as 'county lines', although the criminal exploitation of children is broader than county lines. Staff are highly aware of the vulnerability of the children in our care and remain vigilant to potential indicators of related issues, including risks related to use of technology and the internet.

### **10.4 Radicalisation of children**

Staff at Earthsea House have an awareness that children can be drawn into violence or

---

they can be exposed to the messages of extremist groups by many means including the influence of family members or friends, direct contact with extremist groups and through the internet. Staff understand that this can put a child at risk of being drawn into criminal activity (including terrorism) and has the potential to cause significant harm. Staff are also aware of our responsibilities under the 'Prevent Duty' (2015), understanding the importance of identifying children who may be vulnerable to radicalisation, alongside the importance of building children's resilience to radicalisation through promoting fundamental British values thereby enabling them to challenge extremist views. The high supervision levels of the children at Earthsea House and the careful assessment of risks in relation to children spending independent time off site or attending clubs/groups significantly reduces the risk of radicalisation. Staff seek to remain continually vigilant to potential indicators to radicalisation in our work with the children, their families and their wider networks.

### **10.5 Female genital mutilation (FGM) and other emerging safeguarding issues**

Staff are aware of the issues associated with female genital mutilation (FGM) and in particular, our legal duty to inform Children's Social Care should we suspect or know of any child who may have been subjected to FGM. The senior team within the home seek to remain informed of emerging safeguarding issues as these become evident in order to guide the staff team in their awareness of these potential issues and in safeguarding the children e.g. breast flattening, forced marriage, modern slavery, trafficking and 'county lines'.

### **10.6 Internet safety**

All staff are kept well informed of risks associated with use of the internet, supported by relevant training as appropriate. Due to the age of the children placed at Earthsea House, their use of the internet is fully supervised. We support children to understand the risks associated with the internet, and how to keep themselves safe, as appropriate to their age and level of understanding. Older children may at times be able to work towards small planned amounts of unsupervised time on the internet, as appropriate to their age and level of understanding and to their ability to demonstrate skills in relation to safe and responsible use of the internet. Additionally, older children may be supported to develop age-appropriate independence in relation to using the internet on electronic devices (e.g. mobile phones, tablets) with appropriate parental controls in place. As an additional safeguard we use an 'app' on all devices which enables staff acting in a parental role to check and restricting internet access (where required) in order to safeguard children, both as a preventative measure and as part of a response where concerns arise.

As mentioned previously Childhood First uses an IT surveillance system called 'Securus' which enables the Registered Manager to pick up key words that staff and children input

---

into the Childhood First system through emails, reports, search engines etc. This provides an early alert to any potential safeguarding concerns about staff practice and enables similar monitoring of children's use of the internet. The installation of an application on children's electronic devices and consoles additionally filters inappropriate content and allows restriction and monitoring of internet usage as appropriate.

### **10.7 Significant events**

Events and notifications under Regulation 40 of the Children's Home Regulations are sent to the required authorities as well as to the Chief Executive of Childhood First (Responsible Individual). Notifications are held confidentially within the home and are cross-referenced with other systems such as referrals to the LADO or local Safeguarding Partners. These are monitored by the Registered Manager and through the Regulation 44 process.

### **10.8 If a child goes missing and action taken when a child returns from being missing**

Due to the high levels of supervision of the children living at Earthsea House, staff remain astute to the whereabouts of all of the children all of the time. It is very unusual for a child to go missing; however, in this instance the senior member of staff will be immediately informed and co-ordinate the search for the child while ensuring the remainder of the children are appropriately supervised. If a child goes missing an immediate search is conducted, the homes 'Missing from Care' procedure facilitates this process. The senior member of staff ensures the child remains in sight wherever possible and that they are followed if observed leaving the grounds. If the child is not found once the initial search of the house, grounds and immediate surrounding area has been completed the Registered Manager would be informed or in his absence the Deputy Director or one or all of the Assistant Directors.

Earthsea House staff would work with Police, social care, parents and others as appropriate to locate a missing child and ensure their safety. As required, we have a Safer Homes and Young People 'Missing from Care' protocol in place, within the context of our partnership working with Norfolk Police and the Norfolk MASH Team. During normal office hours, the child's social worker will be contacted. If unavailable, information will be passed to the duty social worker. At evenings and weekends, relevant emergency duty teams will be contacted. We have a good relationship with Norfolk Police and with our allocated police officer who visits the home.

Following a missing or absent episode the child is always welcomed back to Earthsea House in a non-punitive manner, space being given by staff to reassure them and assess any immediate needs, e.g. medical treatment, food, drink, blankets etc. If

possible, the staff would determine where the child had been and with whom, although this would be approached with sensitivity, recognising that they may be tired and frightened, depending on their experiences while absent. Other agencies/persons involved in the search for the child will be informed as soon as possible that the child has returned. The child would then be seen by an appropriate independent person as soon as is practically possible, to participate in a return home interview to explore the reasons for their absence and check on their wellbeing.

## **11. Leadership and Management**

We have a very experienced leadership team leading the home. The Registered Manager being supported by the Deputy Director, 3 Assistant Directors and 3 Team Leaders. Childhood First also has a robust organisational structure that supports Earthsea House within the wider organisation.

### **11.1 Registered Provider and Registered Manager**

Earthsea House is owned and managed by the charitable organisation, Childhood First.  
Registered Office: Childhood First, 210 Borough High Street, London. SE1 1JX

Registered Provider and Responsible Individual: Gary Yexley, Chief Executive  
Work address: Childhood First, 210 Borough High Street, London. SE1 1JX

Residential Service Director: Robyn Bartram  
Work address: Childhood First, 210 Borough High Street, London. SE1 1JX

Registered Manager and Director of Earthsea House: Andy Lamb (Charles Andrew Lamb)  
Work address: Earthsea House, Berry's Lane, Honingham, Norfolk NR9 5AX

The Registered Manager is supervised by Rob Bartram (Residential Services Director) and also directly accountable to the Registered Provider and Chief Executive of Childhood First.

<b>Position</b>	<b>Relevant Qualifications</b>	<b>Professional Experience</b>	<b>UKCP status</b>
Registered Provider & Responsible Individual <b>Gary Yexley</b>	MBA (Dist), Leadership and Management in Healthcare, (Cant Univ), MA (Tavistock), Psychoanalytic Observational Studies	Commenced: 2000  <u>Experience:</u> Therapeutic Services Director, Institute of Integrated Systemic Therapy & Childhood First, Registered Manager and Director of Greenfields	Child Psychotherapeutic Counsellor

		House and Gables House.	
Registered Manager & Director <b>Andy Lamb</b>	PG Diploma Working with Groups. Advanced Diploma Psychosocial Care, Diploma in Social Work.  <u>Studying:</u> Leadership & Management	Commenced: 1999  <u>Experience:</u> 27 years' experience of working with children and families.	Child Psychotherapeutic Counsellor

### 11.2 Consultants and therapists

Our consultant Group Organisational Therapist would meet with the staff team on a weekly basis but would not work directly with the children.

Position	Qualifications	Membership of regulatory bodies	Supervision arrangements
Group Organisational Therapist <b>Current Vacancy</b>	-	-	-
Child Therapist <b>Lucille Knowles</b>	BSc (Hons) Psychology with Health Studies, Advanced Diploma Psychosocial Care, Supervision module, MA in Inter-Professional Practice: Child and Adolescent Mental Health, MA in iST.	Commenced 2004	Child Psychotherapeutic Counsellor Jodie Hutchinson- Line Manager

### 11.3 Staff recruitment

Staff are recruited through a rigorous selection process in accordance with safer recruitment guidelines that involves a series of interviews. Warner interviews are conducted to assess each individual's suitability to work with children prior to a formal interview being offered. The views of the children at Earthsea House are incorporated as appropriate to their age and level of understanding and, where appropriate, children are involved in interviewing applicants who have been deemed to be appropriate for the role. All appropriate checks are carried out according to current legislation and guidelines before any prospective member of staff begins employment with us. We endeavour to provide a range of appropriate role models of both sexes. We also endeavour to recruit a staff team that reflects the diversity of the children's group, however this has continued to prove challenging in our rural location.

#### 11.4 Staff team

There are 44 members of staff at Earthsea House. Supporting the Registered Manager is one Deputy Director, three Assistant Directors and three Team Leaders. The Team Leaders are responsible for their teams supported by their Deputy Team Leaders; these teams provide 24-hour year-round care for the children, following a rota based on a repeating three-week system. The senior team ensure a well managed home in which the home's resources needs and staff development needs are met alongside meeting all statutory requirements. Annual leave is carefully planned enabling rotas to be predictable for both staff and children. Eleven administration and auxiliary staff support the main team, covering the important areas of administration and the physical environment of the home, and three Placement & Family Support Workers working closely with the children's families. Overnight, two therapeutic care workers sleep-in once the children are settled. Staffing levels will be adjusted, according to need and amendments to children's individual risk assessments. The Registered Manager is able to monitor the welfare of children through a variety of weekly forums as well as through informal conversations with children and staff. The Registered Manager facilitates the weekly Community Meeting. This ensures he is attuned to the needs of the group and of the children individually.

<b>Position</b>	<b>Relevant Qualifications</b>	<b>Experience</b>	<b>UKCP status</b>
Deputy Director	BSc (Hons) Psychology, Advanced Diploma in Psychosocial Care, Supervision module, MA in iST.	Commenced 2009	Child Psychotherapeutic Counsellor
Assistant Director Placement and Family Support	BA (Hons) Fine Art, Advanced Diploma in Psychosocial Care. Supervision module iST Group Dynamics MA module  <u>Studying:</u> iST Conversion Course	Commenced 2002  <u>Prior:</u> Youth Worker	Child Psychotherapeutic Counsellor

<b>Position</b>	<b>Relevant Qualifications</b>	<b>Experience</b>	<b>UKCP status</b>
Assistant Director Statutory Compliance	City & Guilds Key Skills, Diploma in Interior Design, Diploma in Psychosocial Care, Supervision module iST Child Mental Health MA module	Commenced 2010	Child Psychotherapeutic Counsellor
Assistant Director Clinical	BA (Hons) Psychology with Clinical Psychology, iST Certificate, iST Diploma, Supervision module iST Child Mental Health MA module	Commenced 2017  <u>Prior:</u> Residential Support Worker	Child Psychotherapeutic Counsellor
Team Leader	National Diploma in Fine Art, Level 2 Certificate in Supporting Teaching & Learning, iST Certificate. iST Diploma, Supervision Module	Commenced 2016  <u>Prior:</u> Key Worker at YMCA	Trainee Child Psychotherapeutic Counsellor
Team Leader	iST Certificate, iST Diploma.	Commenced 2015  <u>Prior:</u> Teaching Assistant	Trainee Child Psychotherapeutic Counsellor
Team Leader	Bachelor of Arts Digital Music and Sound Arts. iST Certificate  <u>Studying:</u> iST Diploma	Commenced 2019	Trainee Child Psychotherapeutic Counsellor
Deputy Team Leader	BSc Biochemistry. iST Certificate  <u>Studying:</u> iST Diploma	Commenced 2019	Trainee Child Psychotherapeutic Counsellor
Deputy Team Leader	A-levels. iST Certificate  <u>Studying:</u> iST Diploma	Commenced 2020	Trainee Child Psychotherapeutic Counsellor

Position	Relevant Qualifications	Experience	UKCP status
Deputy Team Leader	BA (Hons) Dance UAL Level 3 Diploma – Performing and Production Arts 8 GCSEs iST Certificate	Commenced 2023	Not yet registered as a Trainee
Deputy Team Leader	A Levels x 3, GCSE x 11 iST Certificate	Commenced 2022	Not yet registered as a Trainee
Deputy Team Leader	BA Development Studies, Advanced Diploma in Psychosocial Care, Supervision module. MA in iST  <u>Studying:</u> iST Conversion Course	Commenced 2010  <u>Prior:</u> Domestic Violence Support Worker, Play Worker	Child Psychotherapeutic Counsellor
Course Tutor	BA (Hons) Psychology, iST Certificate iST Diploma iST Group Dynamics MA module	Commenced 2018	Trainee Child Psychotherapeutic Counsellor
Placement & Family Support Worker	BA (Hons) Psychology and Sociology, Level 3 Diploma in Health and Social Care. iST Child Mental Health MA module	Commenced 2011  <u>Prior:</u> Early Years Support Worker (voluntary)	Not registered.
Placement & Family Support Worker	NVQ3 Early Years Care & Education, K100 OU Understanding Health & Social Care, K257 OU Mental Health & Distress, Advanced Diploma in Psychosocial Care.	Commenced 2007  <u>Prior:</u> Registered Childminder	Not registered.

<b>Position</b>	<b>Relevant Qualifications</b>	<b>Experience</b>	<b>UKCP status</b>
Placement & Family Support Worker	NVQ Level 3 Children & Young people in the Workplace MA Modules; Child & Adolescent Mental Health and Research Methods	Commenced 2021  <u>Prior:</u> Therapeutic Fostering Practitioner	Not registered
Therapeutic Care Worker	City & Guilds Certificate in Community & Family Care, Diploma in Pre-school Practice, Certificate Psychosocial Care.	Commenced 1999  Prior: Care Assistant, Nanny, Playgroup Supervisor	Not registered.
Therapeutic Care Worker	Bac Diploma and French Language Journalism and Philosophy (Romanian qualifications). iST Certificate iST Diploma	Commenced 2019	Not yet registered as a Trainee
Therapeutic Care Worker	BA Anthropology iST Certificate  <u>Studying:</u> iST Diploma	Commenced 2020	Trainee Child Psychotherapeutic Counsellor
Therapeutic Care Worker	3 ICCE A Level passes (A Level equivalent) BA (Hons) English iST Certificate  <u>Studying:</u> iST Diploma	Commenced 2021	Trainee Child Psychotherapeutic Counsellor
Therapeutic Care Worker	9 x GCSE passes Travel and Tourism – Pass with Distinction iST Certificate  <u>Studying:</u> iST Diploma	Commenced 2021	Trainee Child Psychotherapeutic Counsellor
Therapeutic Care Worker	GNVQ – Merit – Leisure and Tourism GCSE x 2 (Maths and English) PSP Diploma – Eng Lit, History and Psychology BA (Hons) History iST Certificate	Commenced 2022	Not yet registered as a Trainee

<b>Position</b>	<b>Relevant Qualifications</b>	<b>Experience</b>	<b>UKCP status</b>
Therapeutic Care Worker	11 GCSE passes, A level Psychology, Sociology and Fine Art iST Certificate	Commenced 2022	Not yet registered as a Trainee
Therapeutic Care Worker	A Levels x 2 iST Certificate  <u>Studying:</u> iST Diploma	Commenced 2022	Trainee Child Psychotherapeutic Counsellor
Therapeutic Care Worker	11 GCSE passes, 3 A Levels – Geography, Psychology and Sociology  BSc (Hons) Psychology iST Certificate	Commenced 2022	Not yet registered as a Trainee
Therapeutic Care Worker	8 GCSE passes 4/C or above Level 3 Advanced Tech Diploma in Equine Management (Pass) Level 3 Advanced Tech Extended Diploma in Equine Management (Pass, Merit, Merit)  <u>Studying:</u> iST Certificate	Commenced 2022	Not yet registered as a Trainee
Therapeutic Care Worker	9 GCSE passes 4/C or above  3 A levels, B,B,CBSc (Hons) Psychology  iST Certificate  <u>Studying:</u> iST Diploma	Commenced 2022	Trainee Child Psychotherapeutic Counsellor

<b>Position</b>	<b>Relevant Qualifications</b>	<b>Experience</b>	<b>UKCP status</b>
Therapeutic Care Worker	Diploma of Education 2:1 Access to Higher Education Diploma Pass 7 GCSE passes at grades A – C <u>Studying:</u> iST Certificate	Commenced 2023	Not yet registered as a Trainee
Therapeutic Care Worker	4 GCSE passes C or above Access to Higher Ed Diploma (Science for Health Practitioners) CACHE Level 2 Cert in Childcare & Education (Distinction)	Commenced 2024	Not yet registered as a Trainee
Therapeutic Care Worker	7 GCSE passes C/4 and above NCFE Cache Level 3 Cert Supporting Teaching and Learning NCFE Cache Level 3 Diploma, Early Years Educator	Commenced 2024	Not yet registered as a Trainee
Therapeutic Care Worker	9 GCSE passes C/4 and above A Level Photography Health & Social Care Extended Diploma	Commenced 2024	Not yet registered as a Trainee
Therapeutic Care Worker	8 GCSE passes C and above 3 A Levels BA(Hons) Philosophy	Commenced 2024	Not yet registered as a Trainee

### 11.5 Administration and auxiliary staff

<b>Position</b>	<b>Relevant Qualifications</b>	<b>Experience</b>	<b>UKCP status</b>
Clinical Administrator	BSc (Hons) Psychology with Criminology, iST	Commenced 2013	Child Psychotherapeutic

<b>Position</b>	<b>Relevant Qualifications</b>	<b>Experience</b>	<b>UKCP status</b>
	Certificate, iST Diploma, Professional diploma in Therapeutic Life Story Work  <u>Studying:</u> iST Conversion Course	Prior: Samaritans (voluntary), Care Support (voluntary)	Counsellor
Business Support Administrator	O-Levels, BTEC National Certificate in Public Administration.	Commenced 2019	N/A to role
Receptionist & Administrator	A-Levels, BTEC Advanced GNVQ Art and Design.	Commenced 2019	N/A to role
Receptionist & Administrator	8 Intermediate certificates (Eire) 6 Leaving certificates (Eire)  BSc Psychology 2:1	Commenced 2021	N/A to role
Statutory Compliance Administrator	BA (Hons) Dance and Drama, Level 3 Diploma in Health and Social Care, Advanced Diploma in Psychosocial Care, iST Diploma.	Commenced 2012	Child Psychotherapeutic Counsellor
Statutory Compliance Administrator	GCSE C and Functional Skills L2 - Maths NVQ 2 & 3 – Children's Care, Learning and Development OCR L2 Adult Literacy and RSA Typing	Commenced 2022	N/A to role
Cook	GCSE equivalents including Child Care and Development, Complete Nutrition for all Diploma.	Commenced 2007	N/A to role
Household Assistant	N/A	Commenced 2018	N/A to role
Household Assistant	5 CSEs 3 – 5	Commenced 2021	N/A to role

Position	Relevant Qualifications	Experience	UKCP status
	RSA Typing and Pitmans shorthand		
Household Assistant	5 x AQA GCSEs	Commenced 2022	N/A to role
Maintenance Assistant	City and Guilds Furniture Craft Certificate.	Commenced 2015	N/A to role

### **11.6 Staff training and iST**

Childhood First is committed to in-depth staff training. Our work-based training programme was developed in partnership with the Tavistock Clinic and the School of Social Science at Middlesex University. This programme together with iST underpins our care and treatment of the children and the professional development of our staff. This training requires staff to understand and articulate the links between psychodynamic theory and practice in the context of their day-to-day work with the children, with one another and the outside world. Upon commencing employment all staff undertake the iST Foundation Course (equivalent to CWDC Workbook) followed by the iST Certificate (equivalent to Level 3 Diploma), followed by enrolling on the iST Diploma or iST Practitioners Diploma.

The aim of the iST programme is to provide practice-based training for professionals caring for children and young people with complex emotional and psychological needs. iST training is professionally accredited by the United Kingdom Council for Psychotherapy (UKCP) via the College of Child and Adolescent Psychotherapies (C-CAP) and academically accredited by Middlesex University. Childhood First has been registered with UKCP as a Training Organisation since 2015. Staff who have successfully completed the training are registered as UKCP accredited Child Psychotherapeutic Counsellors, staff who are currently working towards this are Trainee Child Psychotherapeutic Counsellors. Working towards accreditation takes five years post-probation.

The iST training programmes are particularly aimed at group-based care settings (e.g. residential therapeutic communities, residential children’s homes, special schools and smaller units) where the assumption is that the core of staff training and development needs to be practice based, with the essential aims of developing the individual, the team and organisational practice. The main purpose of the iST Certificate, iST Diploma, iST Practitioner’s Diploma and Masters programme, is workforce development for the staff who work within our own therapeutic communities. This training provides the basis

---

for the staff to learn the theoretical and practical application of Childhood First's unique iST model within the organisation. We also encourage staff to undertake further relevant training that benefits both the individual and the community enhancing our overall practice.

### **11.7 Staff supervision**

Central to the philosophy of iST is the premise that staff work within a comprehensive framework which emphasises a thorough understanding of the children and of themselves in relation to the therapeutic task. As a therapeutic community, all therapeutic staff are involved in the provision of therapy for the children. Staff engage in several group supervisions each week including Case and Work Discussions, staff dynamics meetings, new staff meetings and practice meetings. These meetings offer a range of ways of understanding the history, inner world, current functioning and impact of the children as individuals and as a group. We also explore of the impact of the staff on the children and the dynamics of these relationships. Staff also receive regular individual supervision with their line manager to facilitate the purpose of continually reflecting on and thinking about the overall task, its planning and integration. All supervisors are experienced practitioners and iST Child Psychotherapeutic Counsellors. The Group Organisational Therapist contributes to this support. They work with the staff team for one day a week, facilitating our reflective practice programme. We currently have a vacancy for this role.

## **12. Complaints & Data Protection**

It is the policy of Childhood First that wherever possible, whether a complaint originates from a child, parent, carer or person with statutory responsibility, the complaint shall be resolved in an informal manner. The formal procedural framework will support our informal procedure and culture. This ensures that we will address any complaints appropriately if informal means have failed to reach a point of resolution. Our complaints procedures can be accessed via the Childhood First Procedures Manual. If for any reason the complainant does not wish to contact Earthsea House or Childhood First directly, complaints can be directed to Ofsted or the placing authority of the child as appropriate.

### **12.1 Complaints by children**

Complaints and 'grumbles' from children can be discussed in Community Meetings where children are supported in challenging one another or staff and in voicing their feelings if they are unhappy about something. Most issues are adequately and effectively resolved in this forum, which fits with our therapeutic model and is a healthy way of enabling children to overcome issues with support from the group.

---

If children feel that they have been treated unfairly or inappropriately in any way they can complain to their keyworker, to any member of staff or to the Registered Manager or one of the Assistant Directors. One of the Assistant Director's is the designated Complaints Officer at Earthsea House; if the child's complaint relates to the Assistant Director, the child can speak to the Registered Manager. If the child's complaint is about the Registered Manager, the child can access other senior staff or use an external agency to express their concern/complaint.

If any child wishes to make a complaint to a person outside of the community, they may do so directly to their social worker, to an independent advocate, Ofsted, the Office of the Children's Rights Director, Regulation 44 visitor, parent, teacher or other person with whom they feel comfortable. They may also contact directly, either by telephone or by letter, the Complaints Officer at Norfolk Children's Services or the Complaints Officer for their individual placing authority.

Information about how to make a complaint is available in an information folder which is kept by the children's telephone, listing relevant telephone numbers and websites, alongside children's 'I want you to know' complaints forms. This folder and the information it contains is explained to children as part of their induction to the home. We endeavour to resolve complaints internally wherever possible but where complaints need to be taken up at a formal level, our complaints procedure or the local authority complaints procedure may be utilised.

## **12.2 Complaints by employees**

In line with our policy, wherever possible complaints and grievances will be resolved in an informal manner, firstly by the establishment of a culture in which staff are encouraged and expected to address issues of concern and conflict at source. The informal framework is supported by the formal procedural framework. This will ensure that any complaints will be addressed appropriately where informal means have failed; this is undertaken in consultation with Childhood First Human Resources.

## **12.3 Complaints by third parties**

Where an external agency or other third party has a concern or complaint about any aspect of the work of any part of Childhood First, of its directors, staff or children, it would be our wish that any such complaint be raised at the earliest opportunity. It would be the Registered Manager's aim that the concern or complaint should be resolved, wherever possible in an informal way, unless of course where the complaint is of a nature where more formal action is appropriate, in which case it shall be the Registered Manager's responsibility to support such action.

---

## **12.4 Data protection**

In compliance with the General Data Protection Regulations (2018), Childhood First is committed to being transparent about meeting its data protection obligations and about how it collects and uses the personal data of those in our care, their families and wider networks as well as our workforce. Our policies relating to data protection and records management can be accessed via the Childhood First Procedures Manual.