



## Safeguarding Policy

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# 1 Our Safeguarding Principles

## 1.1 Introduction

This policy applies to all staff, including senior managers, the board of trustees, paid employees, freelance and agency workers, volunteers, placement students, parents/carers and support workers or anyone working on behalf of The Way Wolverhampton Youth Zone.

The Way Wolverhampton Youth Zone (The Way) works with children and young people from the age of 8 to 19 years (up to the age of 25 years for young people with disabilities). The Way believes that a child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children, young people, and vulnerable adults and to keep them safe. We are committed to practice in a way that protects them.

We believe that:

- All children, young people, and vulnerable adults, who attend The Way have the right to be protected from harm.
- That The Way is a safe environment and will ensure the safety of all within it is a priority.
- All children, young people and vulnerable adults have the right to speak freely and voice their values and beliefs without prejudice.
- All children, young people and vulnerable adults have the right to be supported to meet their physical, social, and emotional needs met.

## 1.2 Principles

The Way takes its responsibility to protect and safeguard the welfare of the children, young people and vulnerable adults entrusted to its care, seriously. Our arrangements ensure:

- All reasonable measures are taken to minimise the risks of harm to the welfare of children, young people, and vulnerable adults.
- All appropriate actions are taken to address concerns about the welfare of children, young people, and vulnerable adults, working to agreed local policies and procedures in full partnership with other local agencies; and
- All persons working at The Way are made aware of the procedures outlined in this policy.

To meet our responsibilities under Working Together to Safeguard Children 2018, we recognise that we have an important role to play in safeguarding children, young people, and vulnerable adults through the services we deliver. This policy ensures that we have the appropriate arrangements in place to safeguard children, young people, and vulnerable adults from harm. Safeguarding and promoting the welfare of children, young people and vulnerable adults is defined for the purposes of this policy as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes

As part of the ethos of The Way, the staff and Board are committed to:

- Encouraging and supporting parents/carers alongside working together in partnership with them.
- Listening to, relating effectively with, and valuing each individual child, young person, or vulnerable adult in our care.
- Ensuring that all staff are appropriately trained and supported.

We recognise that some children, young people, and vulnerable adults, today are the victims of neglect and/or abuse and that staff of The Way Youth Zone, by their knowledge and day-to-day contact with these individuals are well placed to identify such abuse and to offer support to those in need.

### 1.3 What it means for our members

We work with our local safeguarding partners to promote the welfare of children and vulnerable adults and protect them from harm. This includes working with external agencies to ensure an offer of early help when additional needs of children are identified and contributing to inter- agency plans which provide additional support to the child.

All our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any members or staff involved in child protection or safeguarding issue will receive appropriate support.

Our safeguarding culture ensures that we treat all members with respect and involve them in decisions that affect them. We encourage positive, respectful, and safe behaviour among members, and we set a good example by conducting ourselves appropriately.

Identifying safeguarding and child protection concerns often begin with recognising changes in members' behaviour and knowing that these changes may be signs of abuse, neglect, or exploitation. Challenging behaviour may be an indicator of abuse.

## 2 Safeguarding legislation and guidance

This policy has been drawn up based on law and guidance that seeks to protect children, namely:

- Children Act 2004
- Children Act 1989
- Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government July 2018  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- The Care Act 2014  
<https://www.gov.uk/government/publications/care-act-2014-part-1-factsheets/care-act-factsheets>
- Keeping Children Safe in Education\* (2021).
- United Convention of the Rights of the Child 1991
- The Data Protection Act 2018
- General Data Protection Regulation (GDPR)
- Human Rights Act 1998
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Special educational needs and disability (SEND) code of practice: 0 to 25 years – Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents, and carers; HM Government 2015

Safeguarding covers many aspects of service at The Way and should not only be seen as dealing with individual cases of harm or abuse. It relates to many other areas and policies:

- |                        |                                |                                      |
|------------------------|--------------------------------|--------------------------------------|
| • Anti- Bullying       | • Trips & visits               | • Staff Conduct                      |
| • Behaviour Management | • Administration of Medication | • Managing allegations against staff |
| • Peer on Peer Abuse   | • Whistleblowing               | • E-safety                           |
| • Safer Recruitment    | • Health & Safety              | • Transport                          |

### 3 Roles and responsibilities

<b>Designated Personnel</b>		
Chair of the Board	Barry Fletcher	01902 328290
Nominated Director for Safeguarding	Andrew Wolverson	01902 328290
CEO (Lead on Staff Allegations as required in policy)	Gavin Evans	01902 328290
<b>Designated Safeguarding Lead</b> (normally assigned to the Head of Operations)	Beverley Baxter	01902 328290
<b>Deputy Designated Safeguarding Lead</b> (normally assigned to the Mentoring Lead & Youth Work Manager, with additional online DSL training and support from DSL, Nominated Safeguarding Session Lead can fill this post if manager posts are vacant as an interim measure)	Kiah Baxter Agustina Meola	01902 328290
<b>Nominated Safeguarding Session Lead</b> (normally assigned to Duty Managers)	Kiah Baxter Agustina Meola Chris Lane	01902 328290

#### 3.1 The Board of Directors

The Board of Directors has a duty to:

- Hold appropriate and in date safeguarding training for trustees.
- Ensure that The Way complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures, and training opportunities in The Way are robust and always comply with the law.
- Guarantee that The Way contributes to inter-agency working in line with the statutory guidance DfE (2018) 'Working together to safeguard children'.
- Confirm that The Way's safeguarding arrangements consider the procedures and practice of the Local Authority as part of the inter-agency safeguarding procedures established by the Wolverhampton Safeguarding Children Board (Wolverhampton safeguarding together).
- Ensure that a member of the Board of Directors is nominated to liaise with the Local Authority and/or partner agencies on issues of child protection and hold appropriate and in date training for directors.
- Ensure that the Chair of the Board liaises with the Local Authority and/or partner agencies in the event of allegations of abuse made against the CEO and/or directors/trustees and hold appropriate and in date training for chair/trustees.
- Guarantee that there are effective child protection policies and procedures in place together with a staff code of conduct.
- Appoint a member of staff from the executive leadership team (ELT) to the role of DSL as an explicit part of the role-holder's job description – there should always be cover for the DSL.
- Adhere to responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training; and
- Ensure that all staff members receive safeguarding and child protection training updates, such as training sessions, e-bulletins, emails, and staff meetings, as required, but at least annually.

#### 3.2 The CEO

The CEO has a duty to:

- Hold appropriate and in date training for leadership of safeguarding
- Safeguard Children, young people, and vulnerable adults) wellbeing and maintain public trust in The Way.
- Ensure that the policies and procedures adopted by the Board of Directors are followed by staff members.
- Provide staff with the Safeguarding Policy, Staff Code of Conduct, Guidance for Safer Working Practices, information regarding the role of the DSL at induction and on an annual basis.

- Ensure that staff understand the expectations to have received, read, understood, and abide by these policies and procedures.

### 3.3 The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead

The DSL shall ensure that they are fully conversant with the Wolverhampton Safeguarding Together Child Protection Procedures and will coordinate action on any concerns within The Way.

The DSL (and Deputy DSL) will hold an in date Designated Safeguarding Lead/Level 3 Safeguarding qualification.

The designated safeguarding lead is responsible for:

- Ensuring adherence to the Wolverhampton Thresholds to Support process. For guidance, please refer to the [Multi-Agency Children Services Threshold Guidance Document](#)
- Ensuring the referral of individual cases of suspected abuse to the Children's Social Care. This will involve liaising with the Children's Social Care department as well as other agencies on these and other issues relating to safeguarding. This will be undertaken via the MASH team (Multi Agency Safeguarding Hub) 01902 555392 or MASH@wolverhampton.gcsx.gov.uk
- Appropriate and required contact with the LADO for Wolverhampton unless it is deemed not appropriate by the CEO and Board Safeguarding Lead. Should this be the case the CEO and Board Safeguarding Lead would assume this responsibility.
- Updating both the CEO and the Board Safeguarding Lead, informing of any incidents/cases which require Board intervention, in the interests of protecting members, staff, visitors or The Way Wolverhampton Youth Zone's safety or reputation.
- Follow the Onside Network Escalation policy.
- Establishing and ensure a monthly meeting/update is held/given with the Board Safeguarding Led to report on the month's safeguarding matters.
- Making the Board Safeguarding Lead aware of any serious disclosures as soon as possible but no later than within 24 hours of them occurring.
- Ensuring that safeguarding is a standing item on the agenda within board meetings as well as produce a detailed annual report of safeguarding matters.
- Organising training on all aspects of safeguarding within The Way Wolverhampton Youth Zone and to act as a point of reference on safeguarding issues for all staff and board members, ensuring that all staff are trained appropriately, and are aware of their own responsibility in relation to safeguarding.
- Keeping written records of all concerns even if there appears to be no need to make an immediate referral.
- Ensuring that all such records are kept confidentially and securely and are separate from membership records.
- Liaising and joint working with children's social care and other relevant agencies.
- Ensuring that systems for child protection, record-keeping and data protection are shared with staff, and monitored regularly.
- Referring cases of radicalisation to the Channel programme.
- Acting as a source of support, advice, and expertise to staff members on matters of safeguarding.
- Understanding the assessment process for providing early help and intervention.
- Liaising with other agencies and support setting up inter- agency assessment where early help is deemed appropriate.
- Obtaining access to resources and attending any relevant training courses.
- Encouraging a culture of listening to Children, young people, and vulnerable adults) and taking account of their wishes and feelings.
- Working with the Board of Directors to ensure The Way's Safeguarding Policy is reviewed annually and the procedures are updated regularly.
- Ensuring the The Way's Safeguarding Policy is made available publicly.
- Linking with the Local Safeguarding Children Boards to make sure that staff members are aware of the training opportunities available and are made aware of the latest local policies on safeguarding.

If the DSL is available safeguarding matters should be brought to their attention at the earliest opportunity. In the absence of the DSL, the deputy DSL and nominated safeguarding duty managers will manage a case and inform the DSL as a matter of priority, case management will then be allocated. This point should be remembered

throughout this policy where there is reference to incidents being referred to the DSL immediately due to the nature of our working and delivery hours.

### **3.4 Nominated Safeguarding Duty Managers**

Nominated safeguarding duty managers have a responsibility to:

- Hold level 3 safeguarding training, Wolverhampton Safeguarding together DSL training and in house intermediate & advanced level training
- Where Deputy Designated Safeguarding Lead roles become vacant, it may be necessary for the Nominated Safeguarding Duty Managers to undertake the Deputy Designated Safeguarding role as an interim measure. This will require an additional online DSL training course to be undertaken. This will be discussed with the CEO and Nominated Director for Safeguarding before appointing.
- Ensure that the safeguarding procedures are implemented correctly, including completing records and keeping up to date records on Salesforce.
- Support staff who are involved in incidences of safeguarding to ensure policy is adhered to and the correct procedure is followed, giving welfare support and or contacting the DSL (or Deputy) as required.
- Liaising and joint working with children's social care and other relevant agencies.
- Understanding the assessment process for providing early help and intervention.
- Liaising with other agencies and support setting up inter- agency assessment where early help is deemed appropriate.
- Obtaining access to resources and attending any relevant training courses.
- Encouraging a culture of listening to Children, young people and vulnerable adults and taking account of their wishes and feelings.
- Ensuring you are aware of and follow the responsibilities for all staff and other persons (below)

### **3.5 All staff and other persons within The Way**

All staff and other persons within The Way have a duty to:

- Hold appropriate and in date training as per the table in section 22.
- Take immediate action where they have any concerns about the welfare of a child and young person (including young and/or vulnerable adults).
- Always act in the best interests of Children, young people, and vulnerable adults).
- Be aware of policies and procedures within The Way which support safeguarding. This includes the Safeguarding Policy, staff Code of Conduct, the role, and identities of the designated safeguarding lead (DSL) and deputies.
- Be aware of the signs of abuse and neglect, and of what to do if a child or young person (including young and/or vulnerable adults) makes a disclosure.
- Receive appropriate safeguarding training which is annually updated.
- Maintain an appropriate level of confidentiality when liaising with relevant professionals.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Never promise a child or young person (including young and/or vulnerable adults) that they will not tell anyone about a safeguarding disclosure.
- Ensure the correct procedures are followed for any external visitor to visit The Way, to enable the necessary checks to be undertaken or information to be collected.
- Ensure that any visitor to The Way is signed in correctly and has a visitor's badge, and if required, is always supervised.
- Challenge and escort to Reception anybody who you do not recognise and is unaccompanied.
- Report any concerns relating to staff to the DSL, Deputy DSL, Hr & Office Manager; and
- Report any concerns relating to the CEO to the Chair of the Board of Directors.

## **4 Child & Adult Protection Procedures**

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE 2020) refers to four categories of abuse. These are set out at Appendix

One along with indicators of abuse. Additional guidance is also provided via Regional Child Protection procedures – West Midlands (<http://westmidlands.procedures.org.uk/ykpzl/statutory-child-protection-procedures/additional-guidance#s531>)

As an organisation we provide services to children and young adults with additional needs and our safeguarding duties extend to cover all adults in our organisation who may need our support, be that staff, volunteers, members and/or visitors.

#### **4.1 Taking action**

Anyone could become a victim of abuse.

Any member of staff who receives a disclosure of abuse or suspects that abuse may have occurred must report it as soon as possible to the Designated Safeguarding Lead (DSL), deputy DSL and complete a Cause for Concern form.

If the DSL or deputy DSL are not on site, then the member of staff must not delay passing on the information. The cause for concern must be discussed with the duty manager and appropriate action be decided upon.

The DSL (or deputy) must be notified immediately if a child or young person is in immediate danger of serious harm after the police have been called. The Board Safeguarding Lead must also be notified as soon as it is practical but no later than within 24 hours of the incident occurring.

If the child or young person is not in immediate danger and a call is being placed to Children’s Social Care or the Out of Hours team, the DSL (or deputy) should be called for support as required as well as to provide an update at the earliest possible convenience.

If the suspicions in any way involve the DSL, then the report should be made in the first instance to the Chief Executive Officer (CEO) and the Board Safeguarding Lead; if they in anyway involve the deputy DSL the DSL should be notified. Should the alleged perpetrator of abuse be a member of staff, the DSL will consult in line with Wolverhampton safeguarding together guidelines as well as The Way Wolverhampton Youth Zone’s Managing staff allegations policy.

Occasionally there may be differences of professional opinion, however, members of staff have a responsibility to challenge when it is believed that colleagues or other agencies are failing to recognise child maltreatment and/or their response leaves children at risk of significant harm. Where such disagreements arise between practitioners in the same agency, they should be reported to the CEO in the first instance as well as the Board Safeguarding Lead. It may also be necessary to contact the LADO for Wolverhampton.

It is, of course, the right of any individual as a citizen to make direct referrals to the local social services department or the police. However, we strongly advise members of staff to use the guidelines contained in this policy.

#### **4.2 If you are concerned about a member’s welfare**

Staff may suspect that a member may be at risk. This may be because the member’s behaviour has changed, their appearance has changed, or physical signs are noticed. In these circumstances, staff will give the member the opportunity to talk and ask if they are OK.

If the member does reveal that they are being harmed, staff should follow the advice below.

#### **4.3 If a member discloses to you**

If a member tells a member of staff about a risk to their safety or wellbeing, the staff member will:

- remain calm and not overreact.
- allow them to speak freely.
- not be afraid of silences.
- not ask investigative questions.

- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- not automatically offer physical touch as comfort.
- let the student know that to help them they must pass the information onto the DSL.
- tell the member what will happen next.
- complete a cause for concern and pass it to the DSL as soon as possible; and
- report verbally to the DSL even if the child has promised to do it by themselves, unless this is an allegation against a member of staff/person in a position of trust, in which case it should be reported verbally to the CEO.

#### 4.4 Notifying parents/carers

The youth zone will normally seek to discuss any concerns about a member with their parents/carers. If the youth zone believes that notifying parents/carers could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents/carers are notified.

#### 4.5 Adult Safeguarding

‘Adult safeguarding’ is working with adults with care and support needs to keep them safe from abuse or neglect. It is an important part of what many public services do, and a key responsibility of local authorities. In these cases, local services must work together to spot those at risk and take steps to protect them.

At The Way any adult safeguarding concerns will be addressed, if appropriate and comfortable, staff and volunteers can speak to a duty manager during session, or they can contact the DSL (or Deputy DSL) directly for support.

Local guidance will be followed, if there is reason to believe a crime has been committed, there is imminent risk to life or the report is of a sexual offence requiring prompt police action, the suspect is still present, or an immediate response is otherwise required 999 will be called. If this is not the case then a referral to adult safeguarding will be made via [Safeguarding Adult Referral SA1 document](#).

10 main categories of abuse are identified under The Care Act 2014

- Physical abuse  
Including assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions
- Domestic violence  
Including psychological, physical, sexual, financial, emotional abuse; so called ‘honour’ based violence
- Sexual abuse  
Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing, or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting
- Psychological abuse  
Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks
- Financial or material abuse  
Including theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits
- Modern slavery  
Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment
- Discriminatory abuse  
Including forms of harassment, slurs, or similar treatment: because of race, gender and gender identity, age, disability, sexual orientation, or religion
- Organisational abuse

Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice because of the structure, policies, processes, and practices within an organisation

- Neglect and acts of omission
- Including ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating
- Self-neglect  
This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding

Cases where neglect is a concern should utilise the [City of Wolverhampton Council Neglect Toolkit](#).

## 5 Referral to children's social care

The DSL or Deputy DSLs will make a referral to children's social care if it is believed that a member is suffering or is at risk of suffering significant harm. The member (subject to their age and understanding) and the parents/carers will be told that a referral is being made, unless to do so would increase the risk to the child. Where required this will be done by phone, but mainly using the [Online Multi-Agency Referral Form \(MARF\)](#).

## 6 Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if they are convinced that a direct report is required or if the Designated Safeguarding Lead, the deputies, the CEO, or the Board lead for Safeguarding are not available and a referral is required immediately. Where required this will be done by phone, but mainly using the [Online Multi-Agency Referral Form \(MARF\)](#).

## 7 Confidentiality and sharing information

Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the Designated Safeguarding Lead (or Deputy DSLs in their absence), CEO or Board lead for Safeguarding.

### 7.1 Sharing information

The DSL or Deputies will normally obtain consent from the member and/or parents/carers to share child protection information. Where there is good reason to do so, the DSL or Deputies or CEO may share information *without* consent and will record the reason for deciding to do so.

Information sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate, and accurate.

Information sharing decisions will be recorded, whether the decision is taken to share.

The GDPR and the Data Protection Act 2018 do not prevent youth zone staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a member or parent/carer to see child protection records, they will refer the request to the Data Protection Officer.

### 7.2 Storing information

Child protection information will be stored on the member's membership file but will only be visible to the safeguarding team. It will be stored and handled in line with our Retention and Destruction Policy.

## 8 Special Circumstances

## 8.1 Looked after children

The most common reason for children becoming looked after is because of abuse or neglect. The youth zone ensures that staff have the necessary skills and understanding to keep looked after children safe. Wherever known, the details of social workers and the carers authority will be detailed in the young person's file so contact can be made in a timely fashion rather than going through out of hours services.

## 8.2 Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent/carer or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents/carers. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent/carer, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a student may be in a private fostering arrangement, they will tell the DSL and the school will notify the local authority of the circumstances.

## 9 Children who may be particularly vulnerable

Some children are at greater risk of abuse. This increased risk can be caused by many factors including social exclusion, isolation, discrimination, and prejudice. To ensure that all our members receive equal protection, we give special consideration to children who:

- are vulnerable because of their race, ethnicity, religion, disability, gender identity or sexuality.
- are vulnerable to being bullied or engaging in bullying.
- are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism.
- live in chaotic or unsupportive home situations.
- live transient lifestyles or live away from home or in temporary accommodation.
- are affected by parental substance abuse, domestic violence, or parental mental health needs; and
- do not have English as a first language.

## 10 Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- being more prone to peer group isolation than other children.
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Our staff are trained to be aware of and identify these additional barriers to ensure this group of children are appropriately safeguarded.

## 11 Peer on Peer Abuse

Peer on peer abuse – children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter' or 'part of growing up'. It is more likely that boys will be perpetrators of peer-on-peer abuse and female victims, however any allegation will be treated seriously and investigated.

All staff should be clear about the school's policy and procedures for addressing peer on peer abuse.

Peer on peer abuse can take many forms, including:

- **physical abuse** such as hitting, biting, kicking or hair pulling.
- **sexual violence and harassment** such as rape and sexual assault or sexual comments and inappropriate sexual language, remarks, or jokes.
- **upskirting**, which involves taking a picture under a person's clothing without their knowledge.
- **sexting** including pressuring others to share sexual content.
- **teenage relationship abuse** - defined as a pattern of actual or threatened acts of physical, sexual, or emotional abuse, perpetrated against a current or former partner.
- **initiation/hazing** – used to induct newcomers into sports team or school groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond.

Different gender issues can be prevalent when dealing with peer-on-peer abuse, for example girls being sexually touched/assaulted.

### 11.1 Minimising risk

We take the following steps to minimise or prevent the risk of peer-on-peer abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries.
- Using briefings to outline acceptable and unacceptable behaviour.
- Using health and wellbeing session activities to educate and reinforce our messages through stories, roleplay, current affairs, and other suitable activities; and
- Ensuring that the youth zone is well supervised, especially in areas where children might be vulnerable.

### 11.2 Investigating allegations

All allegations of peer-on-peer abuse should be passed to the DSL immediately who will investigate and manage the allegation as follows:

- **Gather information** - children and staff will be spoken with immediately to gather relevant information.
- **Decide on action** - if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection and Safeguarding Policy; and
- **Inform parents/carers** - we will usually discuss concerns with the parents/carers. However, our focus is the safety and wellbeing of the student and so if the youth zone believes that notifying parents/carers could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents/carers are contacted.

### 11.3 Supporting those involved

The support required for the student who has been harmed will depend on their circumstance and the nature of the abuse. The support we provide could include mentoring or signposting to external agencies.

Support may also be required for the member that caused harm. We will seek to understand why the member acted in this way and consider what support may be required to help the member and/or change behaviours. The consequences for the harm caused or intended will be addressed.

## 12 Serious violence

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

### **13 Criminal exploitation of children**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs exploiting children to carry drugs and money from urban areas to suburban and rural areas, market, and seasidetowns.

All staff are aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

County lines exploitation can affect any child under the age of 18 years. It can still be exploitation even if the activity appears consensual, can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. County lines exploitation can be perpetrated by individuals or groups, males or females, and young people or adults and is typified by some form of power imbalance such as age, gender, cognitive ability, physical strength, status, and access to economic or other resources.

[Wolverhampton Exploitation Screening tool 0 to 25 year olds](#), should be used to identify children/young people and adults up to the age of 25 years at risk of / or that are being exploited.

### **14 Child Sexual Exploitation**

Child Sexual Exploitation (CSE) is defined as:

*‘Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.*

*‘The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.’*

[Wolverhampton Exploitation Screening tool 0 to 25 year olds](#), should be used to identify children/young people and adults up to the age of 25 years at risk of / or that are being exploited.

### **15 Child Criminal Exploitation**

Child Criminal Exploitation is a form of child abuse. Child Criminal Exploitation has been defined within the Home Office Serious Violence Crime Strategy (2018) where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Criminal exploitation is a typology of Modern-Day Slavery; the Modern-Day Slavery Act 2015 places a duty on local authorities, including services that are commissioned to give due regard to support people who are drawn into modern slavery in which people are exploited for criminal gain.

Wolverhampton Exploitation Screening tool for Children, Young People and Adults 9up to 25 years only, should be used to identify children/young people and adults up to the age of 25 years at risk of / or that are being exploited.

[Wolverhampton Exploitation Screening tool 0 to 25 year olds](#), should be used to identify children/young people

and adults up to the age of 25 years at risk of / or that are being exploited.

## 16 Sexting

'Sexting' refers to the sending or posting of sexual images of children via mobile phones and other devices or over the internet. It is also known as 'youth produced sexual imagery'.

All sexting incidents will be managed as follows:

- The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.
- Parents/Carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents/carers would put a child at risk of harm; and
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.

## 17 Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate filtering and monitoring systems in place to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk.

## 18 Honour-Based Violence

So-called 'honour-based' violence (HBV) encompasses actions taken to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors and we take them into consideration when deciding what safeguarding action to take. If staff are concerned that a child may be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead.

### 18.1 Female Genital Mutilation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal and a form of child abuse with long-lasting harmful consequences.

FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the designated safeguarding lead. Teachers are also under legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police as well as informing the designated safeguarding lead.

## 18.2 Forced Marriage

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Coercion may include physical, psychological, financial, sexual, and emotional pressure or abuse. Forced marriage is illegal.

Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.

Forced marriage is not the same as arranged marriage, which is common in many cultures.

If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

## 19 Radicalisation and Extremism

Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions, and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism.

If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead.

## 20 Allegations Against Staff

If an allegation is made against a member of staff, our set procedures outlined in the policy for Managing Allegations of Abuse Against Staff and Volunteers must be followed.

Allegations must be reported to the CEO, unless the complaint is about the CEO, in which case concern should be reported to the Chair of the Board.

Any allegations made that involve a staff or board member must be reported immediately to the DSL (or deputy) who will include consultation with the Local Authority Designated Officer (LADO) for Wolverhampton as appropriate.

Allegations made against staff who no longer work at The Way Wolverhampton Youth Zone will be reported to the police.

### 20.1 Protecting yourself against allegations of abuse

All staff should seek to keep their personal contact with children, young people and vulnerable adults who are members of The Way under review and seek to minimise the risk of any situation arising in which misunderstandings can occur.

The following sensible precautions can be taken when working alone with children, young people, and vulnerable adults:

- Work in a room where there is a glass panel in the door or leave the door open.
- Make sure that other adults visit the room occasionally.
- Avoid working in isolation with a member unless thought has been given to safeguards.
- Do not give out personal mobile phone numbers or private e-mail addresses.
- Do not give children, young people, and vulnerable adults lifts home in your cars.
- Do not arrange to meet children, young people, and vulnerable adults outside of The Way (exceptions are in place for the mentoring programme); and
- Do not communicate/ share information with children, young people, and vulnerable adults on social websites. Below is a table which outlines the forms of contact with members which are appropriate and those which are not appropriate.

Personal Mobile	Phone ✗	Text ✗	BBM ✗	Whatsapp ✗
Work Mobile	Phone ✓	Text ✓	BBM ✗	WhatsApp ✗
Social Media	The Way YZ Facebook ✓	Personal Facebook ✗	Twitter ✗	Instagram ✗
Face to Face	Outside The Way ✓ (not prolonged contact)	In a bar/pub ✗	At home ✗	Room alone at The Way (where this appropriately risk assessed) ✓
Email	The Way YZ email ✓		Personal email ✗	

Under the Sexual Offences Act 2003, it is a criminal offence for anyone working in position of trust to have a sexual relationship with a child or young person even when they are over the age of consent.

## 21 Whistle Blowing: if you have concerns about a colleague

It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the DSL, unless the complaint is about the DSL, in which case concern should be reported to the CEO.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

The Way Wolverhampton Youth Zone's Whistleblowing Policy and Procedure allows staff to raise concerns or make allegations and for an appropriate enquiry to take place.

## 22 Staff Training

Our staff receive training, appropriate to their roles, in safeguarding and child protection training which is regularly updated. In addition, all staff receive safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our members.

Staff Group	Induction briefing	Face to Face	Local Authority - DSL	Online DSL Training	Online Level 1	Online Level 2	Online Level 3	Prevent (online – Home Office)
All Delivery Team	✓	✓	✗	✗	✓	✓	✗	✓
Back Office: non-Youth Work	✓	✓	✗	✗	✓	✓	✗	✓
Mentoring Coordinators	✓	✓	✗	✗	✓	✓	✓	✓
Universal Coordinators / Named Safeguarding Duty Managers	✓	✓	✓	✗	✓	✓	✓	✓
OMT: Youth Work (DDSL)	✓	✓	✓	✓	✓	✓	✓	✓
OMT: Non-Youth Work	✓	✓	✗	✗	✓	✓	✗	✓
SLT: Head of Operations (DSL)	✓	✓	✓	✓	✓	✓	✓	✓
SLT: Non-Youth Work	✓	✓	✗	✗	✓	✓	✗	✓
Board of Directors	✓	Also, board responsibilities safeguarding training C/O Onside						✓

New staff, directors and volunteers receive a briefing during their induction which covers this Child Protection and Safeguarding policy and our staff behaviour policy, how to report and record concerns and information about our Designated Safeguarding Lead and deputy DSLs.

## **23 Safer Recruitment**

The Way will follow safer recruitment practice as detailed in safer recruitment policy. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS). All recruitment materials will include reference to The Way's commitment to safeguarding and promoting the wellbeing of children and young people, including young and/or vulnerable adults.

A record will be kept which records all staff, directors/trustees, volunteers, and staff from external agencies.

The following information will be collected:

- An identity checks.
- A barred list check (children & adults) where staff are working in regulated activity.
- An enhanced DBS check where staff are working in regulated activity.
- A check of professional qualifications.
- A check to determine the individual's right to work in the UK; and
- Additional checks for those who have lived or worked outside of the UK.

The youth zone maintains a single central file of recruitment checks undertaken.

For more information refer to our Safer Recruitment Policy.

## **24 Site Security**

Visitors are asked to sign in at reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate checks, they can be provided with unescorted access to the school site. Visitors who have not undergone the required checks will be always escorted.

## Appendix 1 - Four categories of abuse

It is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report their concerns.

All staff should be aware that abuse, neglect, and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

### 1 Physical Abuse

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

#### 1.1 Indicators of physical abuse

The following may be indicators of physical abuse:

- have bruises, bleeding, burns, bites, fractures, or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- An injury that is not consistent with the account given
- Symptoms of drug or alcohol intoxication or poisoning
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

### 2 Emotional Abuse

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

#### 2.1 Indicators of emotional abuse

The following may be indicators of emotional abuse:

- The child consistently describes him/herself in negative ways
- Over-reaction to mistakes
- Delayed physical, mental, or emotional development
- Inappropriate emotional responses, fantasies

- Self-harm
- drug or solvent abuse
- Running away
- Appetite disorders – anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis

### 3 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

#### 3.1 Indicators of sexual abuse

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Aggressive behaviour including sexual harassment or molestation
- Reluctance to undress for PE or swimming
- Anal or vaginal discharge, soreness, or scratching
- Bruises or scratches in the genital area
- Reluctance to go home
- Refusal to communicate
- Depression or withdrawal
- isolation from peer group
- Eating disorders, for example anorexia nervosa and bulimia
- self-harm
- substance abuse
- acquire gifts such as money or a mobile phone from new 'friends'

### 4 Neglect

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

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- protect a child from physical and emotional harm or danger.
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Cases where neglect is a concern should utilise the [City of Wolverhampton Council Neglect Toolkit](#).

#### 4.1 Indicators of neglect

The following may be indicators of neglect:

- Constant hunger or stealing, scavenging and/or hoarding food
- Frequent tiredness
- Frequently dirty or unkempt
- Poor attendance or often late
- Poor concentration
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones or to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is left at home alone or with inappropriate carers

Where neglect is a concern the City of Wolverhampton

### 5. Regional Safeguarding Advice

Guidance on children in specific circumstances are listed below and available by the West Midlands Safeguarding Procedures website:

- [Children affected by Exploitation and Trafficking \(including Gangs\)](#)
- [Safeguarding children and young people against radicalisation and violent extremism](#)
- [Children of parents who misuse substances](#)
- [Children with disabilities](#)
- [Online safety: Children exposed to abuse through digital media](#)
- [Fabricated or Induced Illness](#)
- [Abuse linked to faith or belief](#)
  - [Belief in spirit possession, including witchcraft](#)
  - [Breast ironing](#)
- [Bullying](#)
- [Neglect](#)
- [Self-harm and suicidal behaviour](#)
- [Children of parents with mental health problems](#)
- [Disguised compliance, coercive control and families who are hostile or resistant to change](#)
- [Persons posing a risk to children](#)
- [Children from abroad](#)
- [Children living away from home](#)
- [Sexual activity in children and young people \(including under-age sexual activity\)](#)
- [Children missing from care, home and education](#)
- [Responding to children and families who are not where they are expected to be](#)
- [Female genital mutilation](#)
- [Forced marriage](#)
- [Honour-based abuse](#)
- [Domestic violence and abuse](#)
- [Children who abuse others including peer on peer abuse / harmful sexual behaviour](#)

#### 5.1 Wolverhampton Safeguarding Together Toolkits, Screening Tools and Resources

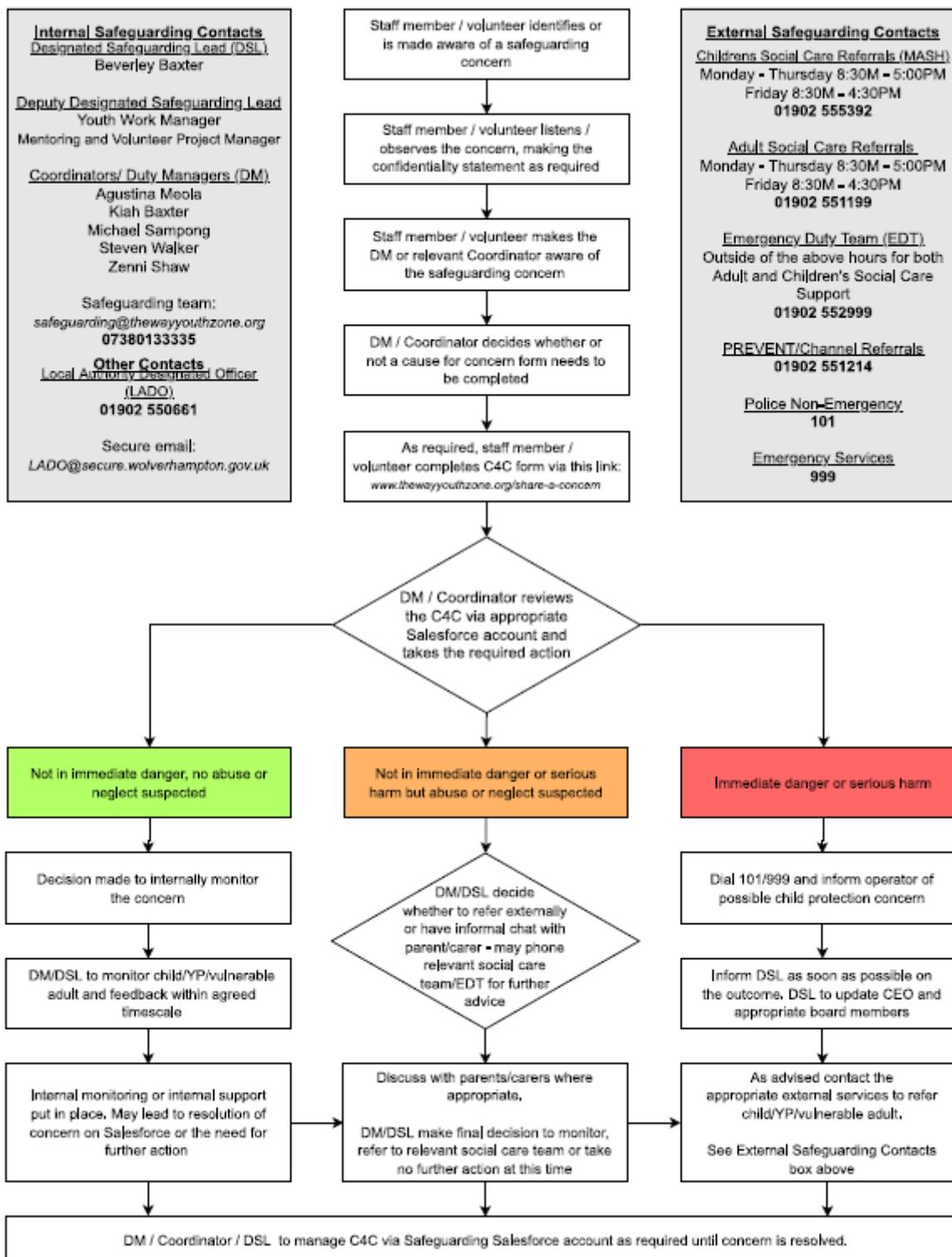
Children:

<https://www.wolverhamptonsafeguarding.org.uk/safeguarding-children-and-young-people/children-s-tool-kits-screening-tools-and-resources>

Adults:

<https://www.wolverhamptonsafeguarding.org.uk/safeguarding-adults/adults-tool-kits-screening-tools-and-resources>

## Appendix 2 Raising a concern about a child, young person and/or vulnerable adult



## Appendix 3 Safeguarding Good Practice – Points to Remember

Effective safeguarding practice includes:

- not promising confidentiality, as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children’s social care) to discuss next steps. Staff should only share the report with those people who are necessary to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising a child is likely to disclose information to someone they trust: this could be anyone on The Way team. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc.;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes, especially if a second member of staff is present. However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a record is made via a cause for concern on Salesforce.
- only recording the facts as the child presents them. The notes should not reflect the opinion of the note taker. Staff should be aware that notes of such reports could become part of a statutory assessment by children’s social care and/or part of a criminal investigation.
- where the report includes an online element, the key consideration is for staff not to view or forward illegal images of a child. The highlighted advice ([Sexting in Schools](#)) provides more details on what to do when viewing an image is unavoidable.
- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible; and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

#### **Appendix 4 - Related Safeguarding policies**

- Behaviour Policy.
- Anti-bullying Policy.
- Self-Harm Policy.
- Staff Code of Conduct.
- Safer Recruitment
- Complaints Policy.
- Whistleblowing Policy and Procedure.
- Staff Induction Policy.
- Health and Safety Policy; and
- Managing Allegations of Abuse Against Staff and Volunteers