

# Child protection and Safeguarding



<b>Approved by: Trustees</b>	<b>Date:</b> September 2021
<b>Trustee:</b> Safeguarding and Child Protection Lead	Hugh Whitaker
<b>Committee Governance</b>	Board of Trustees/SLT
<b>Sub-Committee Responsible</b>	Children's Service Sub Committee
<b>Lead Member of Staff:</b> Director of Operations	Nagindra Chung
<b>Last reviewed on:</b>	September 2021
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## Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Nagindra Chungth	Mobile: 07387 411 328 nagindra@honeypot.org.uk
Deputy DSL	Steve Robinson	Office: 02380 890 002 Mobile: 07795 978 980 steve@honeypot.org.uk
Deputy DSL	Sheri Rogers	Office 01686 622 773 Mobile: 07940 569 036 sheri@honeypot.org.uk
Local authority designated officer (LADO)	Southampton  Wales	Telephone: 023 8091 5535 Mobile: 07500 952 037 <a href="mailto:lado@southampton.gov.uk">lado@southampton.gov.uk</a>  Telephone: 01874 612302 Mobile: 07971 692 447 <a href="mailto:Holly.gordon@powys.gov.uk">Holly.gordon@powys.gov.uk</a>
Trustee – Hugh Whitaker	Safeguarding/Child Protection Lead	Hugh@honeypot.org.uk
Channel helpline		020 7340 7264

## **Purpose of Policy**

Honeypot Charity is committed to keeping children safe and secure on site. This policy relates to all staff, volunteers and trustees of our charity and provides them with the framework they need to do this successfully whilst informing parents and guardians how we will safeguard their children whilst they are in our care.

The Charity's Safeguarding Policy and Child Protection policy describe procedures which are in accordance with government guidance and refer to locally agreed interagency policy and produces put in place by the Local Safeguarding Children's Board (LSCB).

The policy will be reviewed and updated annually in line with DfE, LSCB, safeguarding training provider and any other relevant guidance and updated to reflect any key changes made to national safeguarding policy or procedure.

### **1. Aims**

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- Safeguard all children's welfare, irrelevant of their social economic, cultural or religious backgrounds providing children with opportunities to discuss issues and report problems affecting their safety and welfare.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the charity, contribute to assessments of need and support plans for those children.
- To develop a structured procedure within the charity that will be followed by all members of the charity community in cases of suspected abuse.
- To ensure that all adults within our charity who have access to children have been checked as to their suitability and that safer recruitment practices are followed. This includes other community users of our facilities.

### **2. Legislation and statutory guidance**

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2021) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of children.

The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers and adults to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what ‘regulated activity’ is in relation to children

Statutory guidance on the Prevent duty, which explains charity’s duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and Childcare Act 2006, which set out who is disqualified from working with children

**Other guidance in addition to above are available:**

- Online abuse learning. <https://learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse>
- Bullying <https://learning.nspcc.org.uk/child-abuse-and-neglect/bullying>
- Child protection <https://learning.nspcc.org.uk/child-protection-system>

**3. Definitions – with the document a number of phrases are used which can be explained.**

Safeguarding is taken to mean “All agencies working with children, young people and their families to take all reasonable measures to ensure that the risk of harm to children’s welfare are minimised” and “where there are concerns about children and young people’s welfare, which includes children’s mental and physical health or development, all agencies take all appropriate actions to address those concerns, working to agreed local policies and procedures in full partnership with other agencies”. (KCSiE 2021)

**Safeguarding and promoting the welfare of children** means:

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

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and 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. Appendix 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

**Children** includes everyone under the age of 18.

#### 4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

The protection of children is of the highest priority for our charity. Children have a right to feel safe and secure. All children regardless of age, gender, ethnicity, ability, sexuality, religion, culture, language and beliefs have a right to be protected from harm. All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm in accordance with the guidance. We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will proactively engage in partnership working throughout the child protection process to safeguard children. Whilst the charity will work openly with parents as far as possible, the charity reserves the right to contact Multi-agency Safeguarding Hub (in line with current safeguarding procedures) and Local Safeguarding Children's Board Child and Family Early Intervention Model and Threshold Document or the Police, without notifying parents if this is in the child's best interests KCSiE 2021. In all cases, consent will be sought unless it is not in the child's best interests to do so. These decisions will be clearly recorded with their reason on the charity's system used to record concerns and actions.

#### 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and trustees in the charity and is consistent with the procedures of the 3 safeguarding partners.

##### 5.1 All staff

All staff will read and understand part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including the staff code of conduct, the role of the designated safeguarding lead (DSL) as outlined in Annex B of the Department

for Education's statutory safeguarding guidance, the behaviour policy, and the safeguarding response to children who go missing from education.

- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation. Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

## 5.2 The designated safeguarding lead (DSL)

Our DSL's across the charity are:

Honeypot Charity: Nagindra Chungh (Director of Operations)

Wales House: Sheri Rogers (Operations Manager) Nikita Anthony, Julie Bailey (Children's Residential Leaders)

Hampshire House: Steve Robinson (Operations Manager) Graham Mortimer, Kirsty Crook (Children's Residential Leaders)

The DSL's takes lead responsibility for child protection and wider safeguarding as outlined in Annex B of KCSiE. The DSL will be available during the breaks for staff to discuss any safeguarding concerns. In the absence of the Operations Managers, Children's Service Leaders will be available. There will always be a DSL on site when children are present.

How DSL's can be contacted:

### Wales:

Lead Sheri Rodger: Office: 01686 622773, Mobile: 07940569036,  
email: [sheri@honeypot.org.uk](mailto:sheri@honeypot.org.uk)

Deputy Nikita Anthony: M 07494152717, email [nikita@honeypot.org.uk](mailto:nikita@honeypot.org.uk)

Deputy Julie Bailey: email: [julie@honeypot.org.uk](mailto:julie@honeypot.org.uk)

### Hampshire:

Lead Steve Robinson: Office: 02380 890002, Mobile: 07795978980,  
email: [steve@honeypot.org.uk](mailto:steve@honeypot.org.uk)

Deputy Kirsty Crook: Mobile: 07795978974, email: [kirsty@honeypot.org.uk](mailto:kirsty@honeypot.org.uk)

Deputy Graham Mortimer: email: [graham@honeypot.org.uk](mailto:graham@honeypot.org.uk)

### Honeypot Charity:

Lead Nagindra Chungh: Mobile: 07387411328, email: [nagindra@honeypot.org.uk](mailto:nagindra@honeypot.org.uk)

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters.
- If required to take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- The DSL will liaise with the appropriate authority's case managers and designated officers for child protection concerns as appropriate.
- The full Safeguarding responsibility of the DSL is outlined as part of their roles and responsibilities.

### **5.3 The Trustee board**

The Board of Trustees/SLT will approve this policy at each review and hold the Director of Operations to account for its implementation. The Board of Trustees will appoint a trustee to monitor the effectiveness of this policy in conjunction with the full Board of Trustees/SLT. Our safeguarding trustee is Hugh Whitaker. The chair of trustees will act as the 'case manager' in the event that an allegation of abuse is made against the CEO or any other Director, where appropriate (see appendix 3).

### **5.4 The House Managers/Director of Operations**

The house managers/Director of Operations are responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction.
- Communicate to parents/carers as required that the charity has a safeguarding and child protection policy in place.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

## **6. Confidentiality**

To ensure confidentiality and data protection, our charity adheres to the General Data Protection Regulation and Data Protection Act 2018 as follows:

- Timely information sharing is essential to effective safeguarding information must only be shared on a 'need-to-know' basis, but we do not need consent to share information if a child is suffering, or at risk of, serious harm.
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interest.
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputy)
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- Confidentiality is also addressed in this policy with respect to record-keeping in section 11, and allegations of abuse against staff in appendix 3.

## 6.1 The child's wishes

Where there is a safeguarding concern, we ensure the child's wishes and feelings are taken into account. Systems are in place for children to express their views and give feedback. Ultimately, all decisions should be taken in the best interests any the child (KCSiE 2021). This cannot include keeping their concerns confidential and all adults have a responsibility to ensure that concerns are recorded and acted upon appropriately and in a timely manner, this may include referrals to other agencies, and this will always be communicated to the child (may be communicated differently for different ages of children)

At the houses the systems in place to ensure the child's wishes are taken into account include:

- Discussion with DSL and/or a trusted adult.
- Use of worksheets, illustrations or any medium that the child feels comfortable to communicate by.
- Adult support and interventions

## 7. Recognising abuse and taking action

Staff, volunteers, SLT and trustees must follow the procedures set out below in the event of a safeguarding issue.

### 7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral but this is best carried out with the support of the DSL** (see section 5.2); in any case tell the DSL as soon as possible if you absolutely have to make a referral directly. All immediate safeguarding concerns should be made to the Multi-Agency Safeguarding Hub (MASH) that is the most relevant Local Authority from the area the child has come from to the house. The following is a link to the GOV.UK webpage for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>

### 7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

### 7.3 If you discover that FGM has taken place or a child is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child

abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4. Any adult who discovers that an act of FGM appears to have been carried out on a child under 18 must immediately report this to the police, personally. This is a mandatory statutory duty, and staff will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for staff/adults mentioned above does not apply in cases where a child is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine child/children.

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures. FGM is illegal in the United Kingdom – it is also illegal to take a British National or permanent resident abroad for FGM or to help someone trying to do this. The maximum sentence for carrying out FGM or helping it to take place is 14 years in prison. Call the FGM helpline if you're worried a child is at risk of, or has had, FGM.

#### **FGM Helpline:**

**Telephone:** 0800 028 3550

**Website:** [www.nspcc.org.uk](http://www.nspcc.org.uk)

**Email:** [fgmhelp@NSPCC.org.uk](mailto:fgmhelp@NSPCC.org.uk)

The government has published the following guidance and legislation:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/573782/FGM Mandatory Reporting - procedural information nov16 FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf)

<https://www.gov.uk/government/collections/female-genital-mutilation>

### **7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)**

Figure 1 below, illustrates the procedure to follow if you have any concerns about a child’s welfare.

- Where possible, speak to the DSL first to agree a course of action.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) Share details of any actions you take with the DSL as soon as practically possible.

#### **Early help**

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to provide information to support other agencies and professionals in an early help assessment.

## Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so (see section 7.1). The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

### 7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which staff and trustees can call to raise concerns about extremism with respect to a child. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk).

Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

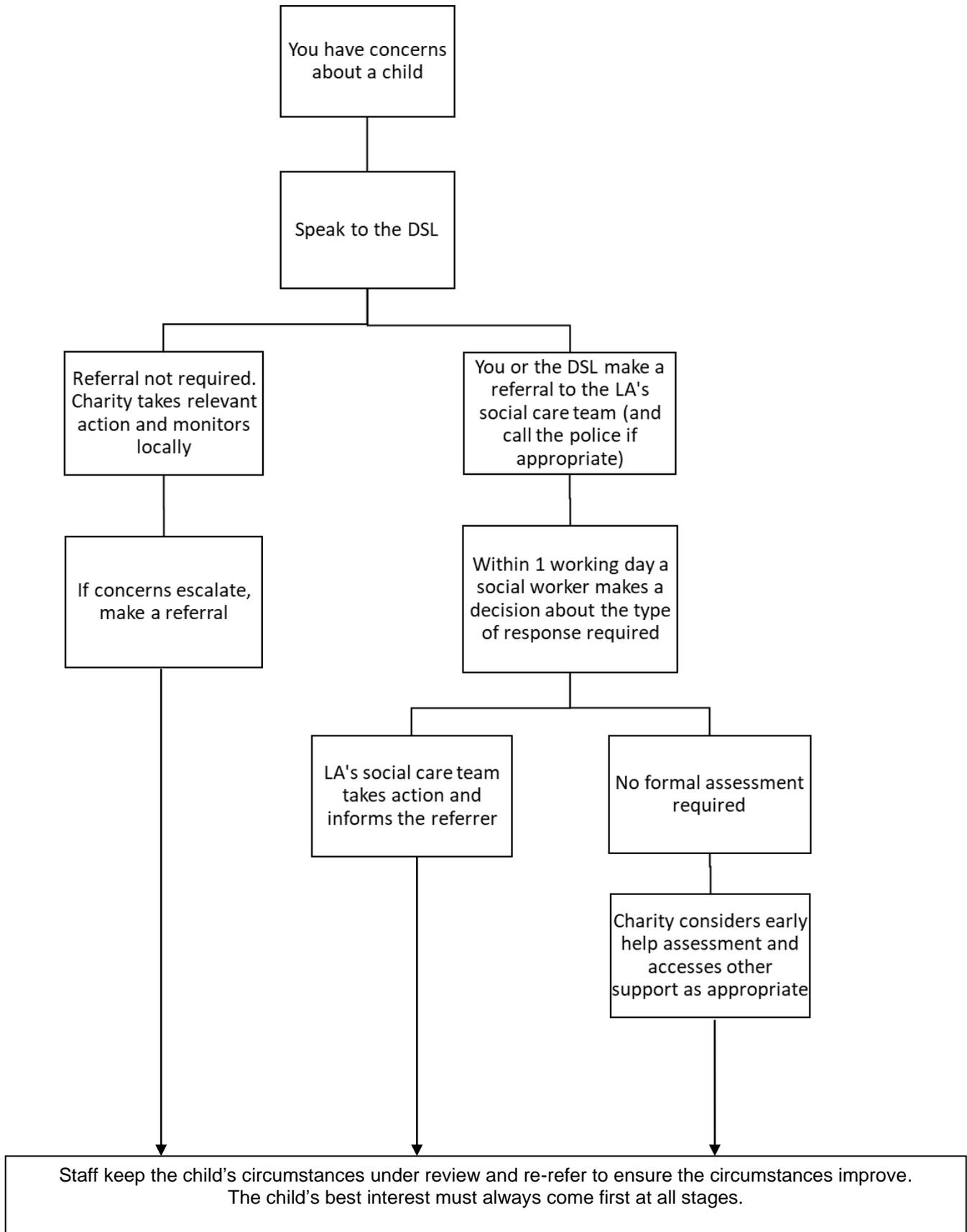
- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

### 7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**



## **7.7 Concerns about a staff member, supply teacher, volunteer or contractor**

If you have concerns about a member of staff (including bank staff, volunteer or contractor), or an allegation is made about a member of staff (including a bank staff, volunteer or contractor) posing a risk of harm to children, speak to the Operations Managers/Director of Operation as soon as possible. If the concerns/allegations are about the Operations Managers/Director of Operation's speak to the CEO/chair of trustees.

The Operations Managers/Director of operations or trustees will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a bank staff, volunteer or contractor) to the Operation Managers/Director of Operations, report it directly to the local authority designated officer (LADO).

Hampshire: LADO Mark Blackwell/Barbara Piddington – Tel: 01962 876364 or

Email: [child.protection@hants.gov.uk](mailto:child.protection@hants.gov.uk)

Southampton: LADO Jemma Swann - Tel: 02380 915535/ 07500 952037 or

Email: [lado@southampton.gov.uk](mailto:lado@southampton.gov.uk)

Wales: LADO Holly Gordon - Telephone: 01874 612302, Mobile: 07971 692447

[Holly.gordon@powys.gov.uk](mailto:Holly.gordon@powys.gov.uk)

## **7.8 Allegations of abuse made against other children (peer on peer abuse)**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of children hurting other children will be dealt with under our charity's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put children in the house at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)
- See appendix 4 for more information about peer-on-peer abuse.

## **Procedures for dealing with allegations of peer-on-peer abuse**

If a child makes an allegation of abuse against another child:

- The DSL will be informed and record the allegation but does not investigate it
- The DSL will contact Children's Services and follow their advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will support the charity to put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed at the charity.

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

### **Creating a supportive environment in the houses and minimising the risk of peer-on-peer abuse**

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure adults through our interventions and support throughout their stay can help to educate children about appropriate behaviour and consent
- Ensure children are able to easily and confidently report abuse to one of the adults on duty in the house.
- Ensure staff reassure victims that they are being taken seriously

Ensure staff are trained to understand:

- How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
- That even if there are no reports of peer-on-peer abuse in the houses, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”

That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

- Children can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- A member of staff may overhear a conversation
- A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a child harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

## **7.9 Sharing of nudes and semi-nudes (‘sexting’)**

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a child to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the child to delete it

- Ask the child/children who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the child/children it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident, and reassure the child/children that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to a child/children
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the children involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the children involved (in most cases parents/carers should be involved)

### **The DSL will make an immediate referral to police and/or children's social care if:**

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any child in the images or videos is under 13
- The DSL has reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Operation Managers/Director of operations and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

### **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the children involved (if appropriate).

If at any point in the process there is a concern that a child has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents/carers**

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through dialling 101 and speaking to them for guidance.

### **Referring to the school**

If it is necessary to refer an incident to a school, this will be done directly to the headteacher or DSL of the school.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### **7.10 Reporting systems for our children**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring children feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Make it clear to the child that their concerns will be taken seriously, and that they can safely express their views and give feedback

## **8. Online safety and the use of mobile technology**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our charity aims to:

- Have robust processes in place to ensure the online safety of children, staff, volunteers and trustees
- Protect and educate the whole community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole charity
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

### **See charity's Online Safety Policy**

**<http://www.saferinternet.org.uk/>**

## **9. Notifying parents or carers**

Where appropriate, we will discuss any concerns about a child with the child's parents or carers, as well as if appropriate the child's school. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers as well as the school about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team and the school if appropriate before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved and their schools.

## **10. Children with special educational needs, disabilities or health issues**

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We would liaise with schools and other agencies to ensure the children are offered extra pastoral support.

## **11. Children with a social worker**

Children who have social workers due to safeguarding or their welfare needs, the DSL's and all members of staff will work and support social workers to help protect vulnerable children.

Where we are aware that a child has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child's safety, welfare and supporting their educational and wellbeing outcomes.

## **12. Looked-after and previously looked-after children**

We will ensure that staff at our houses are aware of the children who come to us if they are looked-after children or they were previously looked-after children, so they are able to apply their skills, knowledge and understanding to keep them safe. The appropriate staff will liaise with the school or outside agencies to respond quickly and effectively to any safeguarding concerns.

## **13. Complaints and concerns about the charity's safeguarding policies**

### **13.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

### **13.2 Other complaints**

Any concerns should be raised with the DSL who will respond to complaints as a matter of urgency or as outlined in the charity's complaints and procedure policy.

### **13.3 Whistle-blowing**

Please refer to the separate whistle-blowing policy that covers concerns regarding the charity deals with poor or unsafe practice, or potential failures.

## **14. Record-keeping**

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Non-confidential records will be easily accessible and available.

Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the charity.

Our safeguarding record-keeping arrangements are as follows:

All concerns are recorded on a form and handed to DSL immediately.

We liaise with the school to ensure we have the latest information to support the child/children's visit to the house.

Any paper records are held in the Operations Manager's office in locked filing cabinets.

The records will be retained in accordance with GDPR recommendations. The charity shares information with other agencies and when this is appropriate, in line with our local safeguarding procedure

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## **15. Training**

### **15.1 All staff**

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the charity's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates as required, but at least annually. Volunteers will receive appropriate training, if applicable.

### **15.2 The DSL and deputies**

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

### **15.3 Board of Trustees**

All trustees are aware of safeguarding or have had training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

### **15.4 Recruitment – interview/appointment panels**

At least one person conducting any interview for any post at the charity will have undertaken safer recruitment training. (to be updated every three years) This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

Safer recruitment trained:

Personnel Manager HR – Elaine Hiskett

Director of Operations – Nagindra Chungh

### **15.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## **16. Monitoring arrangements**

This policy will be reviewed **annually** by Nagindra Chungh – Director of Operations/DSL. At every review, it will be approved by the safeguarding trustee as well as the full trustee board.

## **17. Links with other policies**

This policy links to the following policies and procedures:

Behaviour Policy

Staff code of conduct

Complaints Policy and Procedure

Health and safety

Online safety

Mobile phone use

Diversity and Equality

Whistleblowing

Privacy notices

**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.**

### **Appendix 1: types of abuse**

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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

Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

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

Seeing or hearing the ill-treatment of another

Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**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

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

**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 as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

Protect a child from physical and emotional harm or danger

Ensure adequate supervision (including the use of inadequate care-givers)

Ensure access to appropriate medical care or treatment

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

## **Appendix 2: Safer recruitment and DBS checks – policy and procedures**

### **Recruitment and selection process**

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

#### **Advertising**

When advertising roles, we will make clear:

Charity's commitment to safeguarding and promoting the welfare of children

That safeguarding checks will be undertaken

The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

#### **Application forms**

Our application forms will:

Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

#### **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

Consider any inconsistencies and look for gaps in employment and reasons given for them

Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information

Sign a declaration confirming the information they have provided is true

#### **Seeking references and checking employment history**

We will obtain references. Any concerns raised will be explored further with referees and taken up with the candidate at interview if applicable.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to

be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations

- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer. If the candidate has previously worked with children and is not currently working with children to ensure a reference is obtained when they worked with the children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

### **Interview and selection**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

### **Pre-appointment vetting checks**

We will record all information on the checks carried out in the charity's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff: criminal records checks for overseas applicants

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

If necessary we will ensure that any contractor, or any employee of the contractor, who is to work at the sites has had the appropriate level of DBS check.

However, we believe no contractor will work on the sites while children are there unless it is deemed the work that needs to be carried out there and then is essential to the site and to keep the children and staff safe. In this case Operations Manager/Site Manager will supervise the contractors at all times.

If for any reason contractors need to be on site while children and staff are there then there will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.

- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- For self-employed contractors such as teachers or any other individual who will carry out memory making days, etc, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Work Placements/Students**

Where we have work experience or students we will ensure that all necessary checks are carried out.

We will ensure, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### **Board of Trustees/SLT**

Trustees who have regular face to face contact with children on site will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

Trustees who have regular face to face contact with children on site will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

## Appendix 3: Allegations of abuse made against staff

### Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including outside agency workers, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of an organisation.
- 

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Operations Manager or the trustee, where the Operations Manager is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

#### **Suspension of the accused until the case is resolved**

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the organisation so that the individual does not have direct contact with the child or children concerned
- Redeploying the individual to alternative work in the organisation so that they do not have unsupervised access to children
- Temporarily redeploying the individual to another role in a different location, for example to an alternative location.
- If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

#### **Definitions for outcomes of allegation investigations**

**Substantiated:** there is sufficient evidence to prove the allegation

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

**False:** there is sufficient evidence to disprove the allegation

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the organisation is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care and notify the school.

**If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the organisation and their contact details.

**If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

**If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in the organisation and/or liaise with the police and/or children's social care services as appropriate  
Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against staff (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a member of staff will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

In the case of a teacher, headteacher or any other professional working for the organisation and the organisation is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from our organisation, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the organisation will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the organisations disciplinary process, should this be required at a later point.

### **Additional considerations agency staff and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the charity, such as a contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

The safeguarding trustee will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the organisation, while the organisation carries out the investigation

We will involve the agency fully, but the charity will take the lead in collecting the necessary information and providing it to the LADO as required

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the charity ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether school inclusion on the barred lists is required.

#### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending our houses.

#### **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the charity will consider whether any disciplinary action is appropriate against the individual(s) who made it

#### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the charity will consider whether any disciplinary action is appropriate against the individual(s) who made it

#### **Confidentiality and information sharing**

The charity will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the charity will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### **References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

### **Learning lessons**

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the charity's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## **Non-recent allegations**

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the charity that they were abused as a child, we will advise the individual to report the allegation to the police.

## **Section 2: concerns that do not meet the harm threshold**

This section applies to all concerns (including allegations) about members of staff, including agency staff, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school or charity
- Pre-employment vetting checks
- We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

## **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the charity may have acted in a way that:

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

## **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

## **Responding to low-level concerns**

If the concern is raised via a third party, the Operations Manager will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Operations Manager will use the information collected to categorise the type of behaviour and determine any further action, in line with the charity policies.

## **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the charity
- Where a low-level concern relates to agency staff or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## Appendix 4: specific safeguarding issues

### Children missing from education (Staff at the charity to be aware of)

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

All our staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if we are aware the child is suffering or likely to suffer from harm, or in immediate danger.

### Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late

- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL and the child's school. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL and school. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

The DSL will provide support according to the child's needs and update records about their circumstances.

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The charity DSL will work closely with the relevant school and the parents to ensure they have up-to-date information regarding the status of the child who will visit our houses and their families.

## So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures as well as talk to the school where the child attends.

## FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise
  - The school has notified us that the child has been absent from school for a long period.
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out

- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from an adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from her school – would notify the charity.

The above indicators and risk factors are not intended to be exhaustive.

### **Forced marriage**

Forcing a person into marriage is a crime. 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. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a child is being forced into marriage, they will speak to the child about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the child about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### **Preventing radicalisation**

**Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

**Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will work with school and organisation to assess the risk of children in our charity being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will encourage that suitable internet filtering is in place, and support children to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in children's behaviour from their previous visit.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a child, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

## **Peer-on-peer abuse**

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our charity's approach to this type of abuse.

## **Sexual violence and sexual harassment between children**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)
- Sexual violence and sexual harassment exist on a continuum and may overlap.
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our charity's approach to this type of abuse.

### **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from their school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance at school
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

### **Checking the identity and suitability of visitors**

- All visitors will be required to verify their identity to the satisfaction of staff
- If the visitor is unknown to the site, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.
- Normally all appointments for visitors is made beforehand and the Operations Managers are aware of who is visiting and why
- All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite on to the site any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using site facilities is not seeking to disseminate extremist views or radicalise children or staff.