

Ref 21

**August**



**SAFEGUARDING POLICY**

**The Shires Stretton**

**REGISTERED MANAGER:**

**Kirsty Truesdale**

**RESPONSIBLE INDIVIDUAL:**

**Katie Harrison**

## **1. Policy statement**

- 1.1** OFG is committed to ensuring that children and young people are effectively safeguarded in all services including fostering, schools and residential homes.
- 1.2** The Shires employees **must** ensure that:
- children and young people feel safe and that they are listened to;
  - they create an environment in which children and young people feel valued;
  - safer recruitment procedures are rigorously followed (please refer to the The Shires Safer Recruitment Policy for further details);
  - they understand their roles and responsibilities in keeping children and young people safe through ongoing learning, development and supervision;
  - they are vigilant in monitoring possible signs of abuse including for those children and young people who have complex learning difficulties or specific communication needs;
  - they follow the appropriate procedures in place for sharing safeguarding concerns and that these are shared with relevant professionals in a timely manner;
  - they understand and implement local safeguarding procedures as set out in local authority arrangements;
  - children and young people have opportunity to learn about appropriate relationships with adults and recognise unacceptable behaviour by adults.

## **2. What is safeguarding and child protection?**

### **2.1 Safeguarding**

Safeguarding relates to the action taken to promote the welfare of children and young people to protect them from harm.

**2.2** Safeguarding is defined in Working Together to Safeguard Children (DfE, Sept 2018) as:

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

**2.3** OFG adopts a contextual safeguarding approach to safeguarding and child protection. Contextual safeguarding is: *'...an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.'* (Dr Carlene Firmin)

### **2.4 Child Protection**

Child protection is an important aspect of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to

suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

## **2.5 Safeguarding is everyone's responsibility**

While local authorities and placing authorities have statutory responsibilities regarding safeguarding, The Shires believes that safeguarding is everyone's responsibility. The Shires expects that staff keep the child or young person at the centre of all that they do and that any actions taken are in the best interests of the child. We also expect that children and young people are listened to and their voices are always heard. This is without exception and regardless of whether the child or young person is being cared for in a residential setting, foster home or being educated within school.

## **2.6 Defining Significant Harm/Child Abuse**

'Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, including: sexual, physical and emotional abuse; neglect; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever the form of abuse or neglect, practitioners should put the needs of children first when determining what action to take' (Working Together to Safeguard Children July 2018)

**2.7** The Children Act 1989 introduced the concept of 'Significant Harm' as the threshold that justifies compulsory intervention in family life in the best interests of children. Under Section 47 of the Act, local authorities have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or is likely to suffer Significant Harm.

## **2.8 Under s31(9) of the Children Act 1989 as amended by the Adoption and Children Act 2002:**

'**harm**' means ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another;  
'**health**' means physical or mental health; and  
'**ill-treatment**' includes sexual abuse and forms of ill-treatment which are not physical. Abuse or neglect is not always easy to identify; staff are more than likely to have some information but not the whole picture.

**2.9** There are four defined categories of child abuse, which are deemed to be forms of 'Significant Harm':

- Neglect;
- Physical Abuse;
- Emotional Abuse;
- Sexual Abuse.

**2.10 All staff must be aware of the signs and indicators of child abuse.**

## **3. Local Arrangements for the home**

**3.1** All staff must be aware of the local arrangements for safeguarding relevant to the home in which they work;

**3.2** The local arrangements for The Shires home are as follows

**3.3** The Shires at Stretton safeguarding arrangements are in line with local safeguarding partnership arrangements. The local safeguarding partnership consists of the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police force in the local authority area)

**3.4** The Local Authority Designated Officer is Denise Wynter, Rutland County Council  
Catmose, Oakham, Rutland LE15 6HP Tel: 01572758417 email: [lado@rutland.gov.uk](mailto:lado@rutland.gov.uk)

**3.5** All safeguarding referrals must be reported to the local authority Duty Team on 01572 758407 or email [childrensrefferals@rutland.gov.uk](mailto:childrensrefferals@rutland.gov.uk)

**3.6** The local authority safeguarding referral procedure is:

“anyone who has a concern about a child’s welfare should make a referral to children’s social care services. When there are concerns about significant harm, the referral must be made Immediately. The greater the level of perceived risk, the more urgent the action should be... The Duty social worker should acknowledge within 1 working day or receiving it. If the refer has not received a response within 3 working days he/she should contact the manager in Children’s social care services team again.

“within one working day of a referral being received the social worker should make a decision about the type of response that is required. This will include determining whether:

- The Child requires immediate protection and urgent action required
- The child is in need, and should be assessed under section 17 of the children act 1989;
- There is reasonable cause to suspect that the child is suffering, or likely to suffer, significant harm and whether enquires must be made and the child assessed under section 47 of the children act 1989, following a multi-agency strategy meeting discussed;
- Any services are required by the child and family and what type of services;
- Further specialist assessments by the child and family and what type of services;
- Further specialist assessments are required in order to help the local authority to decide what further action to take; or
- No further action will be required

“feedback should be given by Children’s social care services to the refer on the decisions taken. Where appropriate, this feedback should include the reasons why a case may not meet the statutory threshold to be considered by Children’s Social Care Services for assessment and suggestion for other sources of more suitable support”

**3.7** For all referrals regarding radicalisation:

“CONTEST is the overall UK strategy for countering terrorism. The Aim of CONTEST is to reduce risk to the UK and its interests overseas from terrorism, so that people go about their lives freely and with confidence. It has four streams, of which PREVENT is one. The Purpose of the Prevent Strategy is to stop people becoming terrorists or supporting terrorism.”

“The Strategy addresses all forms of terrorism and focuses work to prevent radicalisation on three key objectives:

- Challenging ideology that supports terrorism;
- Protecting venerable individuals; and
- Supporting sectors and institutions where there is a risk of radicalisation”

“Channel is a key element of the Prevent strategy. It is a multi-agency approach to protect people at risk from radicalisation. Channel uses existing collaboration between local authorities, statutory partner (such as education and health sectors, social care, children’s and youth services and offender’s management services), the Police and the local authority to:

- Identify individual at risk of being drawn into terrorism;
- Asses the nature and extent of that risk;
- Develop the most appropriate support plan for the individuals concerned.

“An agency or member of the public can make a referral to Channel. A referral from an agency/organisation should go via the Designated safeguarding lead. The Designated Safeguarding Lead should then discuss with the Police Prevent Team, tel 101 or go to [www.eastmidlandsprevent.co.uk](http://www.eastmidlandsprevent.co.uk)

### **3.8** For all referrals regarding exploitation:

“ If a practitioner is concerned that a child or young person is involved or likely to be involved in a sexual exploitation and /or trafficking, they should immediately make a referral to Children Social Care or the Police CAIU. The practitioner should make the referral to the local area duty team or the police.

If the Child or young people has (or is awaiting allocation of) a social worker, the duty team should send the referral to the named social worker, or in their absence the team manager. Sending all sexual exploitation referrals to the duty teams enables Children’s Social Care to ensure a coordinated response.

Agencies with statutory child protection duties must consider, at all stages, the need for urgent action that may be necessary to secure the child/young person’s safety.

Should the professionals have concerns that they would like to discuss prior to a referral, they can do so by consulting with the safeguarding lead in their own agency or directly with the key contact in Children’s Social Care. All professionals are encouraged to seek advice if they are not sure there is sufficient ‘evidence’ or are not sure about the possible risk indicators.

In relation to confidentiality, where there are concerns that a child or young person is subject to sexual exploitation/trafficking, all agencies have a responsibility to report their concerns and share information. The need for a child or young person to be safeguarded overrides their right to confidentiality. Data protection should not prevent the sharing of information but ensure that relevant information is shared appropriately”

**3.9** The National Safeguarding Improvement Officer is Nicola Thomas Mobile: 07733808705, Email: [nthomas@nfa.co.uk](mailto:nthomas@nfa.co.uk)

#### **4. Safeguarding Training and Updates**

##### **4.1 All staff must read the following documents:**

- The home’s Restrictive Physical Intervention Policy
- The home’s Anti-bullying policy
- OFG Group’s Exploitation policy
- OFG Group’s Protecting Children from Radicalisation policy
- OFG Group’s Harmful Sexual Behaviours policy
- OFG Group’s Safer Recruitment policy
- OFG Group’s Data Protection policy
- OFG Group’s Web Filtering policy
- OFG Group’s Managing Allegation Policy and Procedure
- The home’s Whistle blowing and complaints policy
- The home’s staff behaviour policy (Code of Conduct)

**4.2** Safeguarding updates must be regularly provided to staff, either through face to face training, meetings or through regular written updates.

- **Face to face safeguarding training must be provided (and recorded) to all staff at least annually.**

**4.3 All members of the home management team should also be familiar with Working Together to Safeguard Children 2018.**

#### **5. Partnership working and sharing information**

**5.1** Partnership working and the sharing of information is key in keeping children safe. Everyone who has a role to play in caring for children has a duty to share good quality information with the relevant professionals in a timely manner.

##### **5.2 General Data Protection Regulations**

All homes must ensure that they comply with The Shires Data Protection Policy which incorporates the GDPR requirements. The GDPR works around the principles of consent and assumes the automatic right of privacy to all individuals. This applies to children and young people’s personal information, as well as that of staff and parents/carer’s.

**5.3 All staff must complete the GDPR training. All staff have a responsibility to ensure that they comply with the GDPR requirements.**

**5.4** Homes must ensure that they inform young people, parents and carers of how their

personal information will be stored and used.

**5.5 The GDPR is not a barrier to sharing safeguarding information. Safeguarding concerns must always be passed on.**

**5.6** Homes must ensure that they hold emergency contact details of the parents/carers of young people. This is to be done with the agreement of the parents/carers. Data breaches must be reported immediately to the Data Protection manager as set out in the Data Protection Policy.

**6. Safeguarding Lead (Registered Manager)**

**6.1** The Registered Manager is the Safeguarding Lead for the home and is responsible for ensuring that the safeguarding policy is followed. Where necessary they should liaise with the Responsible Individual for advice and guidance.

**6.2** The Registered Manager must ensure that there are clear monitoring arrangements in place which allows them to have effective oversight of all safeguarding matters and of all serious incident notifications.

**6.3** The Registered Manager must ensure that all staff have been recruited in line with the THE SHIRES Group safer recruitment policy and that all staff receive a clear induction, including training on their safeguarding responsibilities and all safeguarding policies and procedures.

**6.4** The Registered Manager must ensure there are arrangements for staff to be able to inform a senior manager of any safeguarding concerns they may have at all times.

**6.5 The main responsibilities of the Safeguarding Lead (Registered Manager) are to:**

- provide support to staff regarding safeguarding concerns;
- lead on advising staff of any action to be taken due to a safeguarding concern;
- ensure that children and young people are immediately safeguarded from harm and abuse;
- ensure that there is appropriate cover during their absence, and that staff know who to approach if they are unavailable;
- liaise with local authorities and other professionals, sharing information and fully assisting with any enquiries;
- adopt a child focused and holistic approach to deciding on further action;
- refer allegations to the Local Authority Designated Officer;
- refer safeguarding concerns to placing and host local authorities;
- refer suspected cases of radicalisation to Channel;
- refer suspected case of Female Genital Mutilation to the police;
- refer suspected cases of Child Sexual Exploitation and trafficking to the police;
- refer cases to the Disclosure and Barring Service after staff have been dismissed or there is suspected harm having been caused to children and young people;
- liaise with THE SHIRES Group Quality Assurance Team and HR Team of any allegations or suspected harm having been caused to a child by a member of staff or employee of THE SHIRES group;
- ensure that the school complies with the work of the local safeguarding partnership.
- ensure that all staff receive regular update training in relation to safeguarding;
- provide safeguarding updates to senior managers;
- ensure that there is effective monitoring and oversight of all safeguarding concerns;
- ensuring the notification of serious incidents to Ofsted

- promoting the educational achievements of Looked After Children in line with the Children and Social Work Act 2017.

**6.5** It is important that all staff understand the role of the Safeguarding Lead on their appointment within the home and as part of their induction. The Safeguarding Lead is responsible for ensuring that all staff understand their roles and responsibilities regarding safeguarding children and that a child focused approach is taken. The Safeguarding Lead will assess safeguarding concerns within the context of young people's environments. This is known as contextual safeguarding. The Safeguarding Lead must ensure that clear, concise and good quality documents are kept of all allegations or safeguarding concerns. Data protection is not a barrier to record keeping or information sharing.

**6.6** The Responsible Individual for the home must maintain oversight of safeguarding matters within the home, provide advice and guidance to the Safeguarding Lead and ensure that the safeguarding policy and Ofsted notification process is followed. **The Responsible Individual must ensure they fulfill their legal responsibility for all safeguarding matters in the home.**

## **7. Roles and Responsibilities of Staff**

**7.1** THE SHIRES Group recognises that it is not just one person's role to safeguard children but that it requires a collective response to safeguarding. All THE SHIRES group employees must understand their roles and responsibilities regarding keeping children safe and reporting concerns.

**7.2** During staff induction, staff will receive safeguarding training. Staff must be familiar and understand the role of the Safeguarding Lead, the local safeguarding partnership and the individual systems relating to safeguarding within the home. Staff must also know, understand and implement the home's behaviour management policy, the home's code of conduct, and the safeguarding response to children who go missing.

### **7.3 Staff are responsible for:**

- compliance with THE SHIRES Group policies, statutory guidance and legislation including Working Together to Safeguard Children (2018);
- understanding the role of the Safeguarding Lead;
- helping to develop a culture which helps children and young people to understand about abuse, appropriate and safe relationships with adults and peers, and keeping safe both online and off line;
- helping to provide an environment where children and young people feel safe and valued;
- attending training and meetings;
- ensuring that they fully understand how to report concerns and if not, asking for further training and support;
- understand the safeguarding response to children who go missing;
- listening to children and young people;
- supporting children and young people if they disclose safeguarding information;
- ensuring that they are alert to signs of abuse by peers or adults;
- ensuring that they are aware of indicators or possible signs of neglect;
- ensuring that they closely monitor any possible signs of abuse or harm for those children who are unable to communicate verbally or who have complex health and care needs;
- keeping sensitive information confidential and sharing it only with those professionals for whom it is relevant;

- helping to implement Child Protection Plans.

**7.4** Staff are in a close position to children and young people within homes as they know the children and young people. They have regular contact with them and so are in the best position to know if a child or young person is behaving in a way which could possibly indicate that they are being hurt or harmed. Any concerns, whether these are nagging doubts, worries, concerns or based on information told to them, must be reported **immediately** to the Safeguarding Lead both verbally and in writing. **It is the staff member's responsibility to ensure that this information is acted upon. They have a duty to follow up with the Safeguarding Lead to ensure that action has been taken.**

## **8. Reporting concerns**

### **8.1 What to do if a child or young person discloses**

If a child or young person discloses information to a member of staff, they must ensure that they:

- listen to the child or young person;
- do not dismiss what the child or young person tells them. All concerns must be acted upon rigorously;
- do not promise to keep it a secret. They must explain that they have a duty to share information to keep them safe and protect them;
- write down what the child or young person tells them. This must be accurate and in the child's words;
- immediately report the concerns to the Safeguarding Lead or deputy home manager . If neither is available, the member of staff must report the information to the Head of Care, Responsible Individual or Principal.

**8.2** Staff must be alert to not just potential familial abuse, but also to children and young people making allegations against staff, volunteers or peers.

**8.3** All concerns, however small or trivial they may seem, **must** be immediately reported to the Safeguarding Lead. This must be done verbally and then followed up **on the same day** and documented on the home records. The member of staff has a responsibility to ensure that action has been taken with regards to the concerns on the **following day** and that the concern is documented on the home records. If action is not taken in a timely way as the member of staff sees fit, they have a duty to escalate their concerns to the Head of Care, Principal or the Assistant Director for Education.

**8.4** Staff must prioritise the child or young person's immediate safety. They must remain professional and adhere to all safeguarding and confidentiality procedures. After sharing the information with the Safeguarding Lead or deputy home manager, they must not share it with anyone else.

**8.5** On receipt of the information, the Safeguarding Lead must consider all information and then report this within **one working day** to the host authority, placing authority, Principal Assistant Director for Education and where relevant the Local Authority Designated Officer.

## **9. Peer on Peer Abuse and Bullying**

- 9.1 It should be remembered that ' ... abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".**
- 9.2** Staff must ensure that they create a home environment where children and young people's safety is paramount and where unacceptable or unsafe behaviour will not be tolerated. Staff must be aware and alert to incidents of on line abuse, sexting, sexual violence and sexual harassment between young people, and bullying. This includes upskirting which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause the victim humiliation, distress or alarm. Staff must be alert to possible signs of peer on peer abuse. Inappropriate language must be rigorously and consistently challenged.
- 9.3** A contextual safeguarding approach must be taken when considering possible peer on peer abuse. Children and young people who display harmful behaviours must be seen as potential victims themselves, and the wider environmental risks must be taken into account. Staff must challenge any gender bias or derogatory language used by staff or young people. Staff must not dismiss any concerns brought to them by young people. Staff can report concerns verbally but they must ensure that all concerns are recorded onto home records on the same day.
- 9.4 Staff must act immediately and report any concerns regarding peer on peer abuse to the Safeguarding Lead.**
- 9.5** When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well as any relevant personal circumstances and how this relates to their behaviour. Homes must consider any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.
- 9.6 What to do if there are concerns**  
Safeguarding Leads must deal with any concerns of peer on peer abuse immediately and sensitively. As much information as possible must be gathered from the victim and the young person who has allegedly displayed harmful behaviour in order to gain the facts of what has happened.
- 9.7** The language used must be sensitive, non-judgemental and must not blame the victim. Victims must be supported and reassured that their safety and welfare within the home is the priority. Risk assessments must be implemented where necessary.
- 9.8** Where the Safeguarding Lead believes that there has been significant harm caused to the young person, a referral must be made to the local authority immediately. In agreement with the local authority, parents/carers must be informed. Where possible, as best practice, parents/carers are to be informed face to face.
- 9.9** If the local authority do not believe it meets their threshold for further action and the Safeguarding Lead is not in agreement, this must be challenged with the local authority.
- 9.10 After the outcome/conclusion of the incident:**
- a contextual safeguarding approach must be taken;

- homes must take all necessary action to learn from the incident and prevent future incidents from occurring, such as through targeted work around specific types of peer on peer abuse;
- support for the victim must be offered and provided where possible. If necessary, appropriate risk assessments must be implemented to provide reassurance and safety for the victim;
- homes must ensure that they **do not** adopt a victim blaming approach;
- the Safeguarding Lead must complete an investigation into the incident; The investigation must consider the occurrence of the incident itself as well as whether it is an isolated incident, and the personal circumstances of the young person who is alleged to have displayed harmful behaviour;
- if necessary, appropriate referrals must be made to support services for the young person who has displayed harmful behaviours;
- a risk assessment to be completed and implemented for the young person who has displayed harmful behaviours in order to safeguard them and other young people.

### **9.11 Bullying**

Severe or persistent forms of bullying can result in Significant Harm, which is why those providing services for children should have adequate policies, procedures and training to counter bullying. Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see. It can be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable'; it can even be encouraged and rewarded.

**9.12** THE SHIRES Group has a zero tolerance approach to bullying. All staff have a responsibility to challenge bullying even at a low level. Staff must help children and young people to understand what bullying is and how to report it. Bullying must be dealt with as a safeguarding matter. Staff must report any bullying concerns to the Safeguarding Lead **on the same day**. The concerns must be documented on the homes records.

**9.13** Homes have a responsibility to ensure that those children and young people who bully, are supported and helped to understand the impact of their actions.

**9.14** For further information please refer to the home's anti-bullying policy, child protection policy, the Web Filtering policy, and the DfE guidance 'Sexual violence and sexual harassment between children in schools and colleges' December 2017.

**9.15 All staff have a responsibility to report any suspicions or concerns that a child has or may be mistreated or harmed.**

### **9.16 Preventative Strategies**

The home will take all appropriate action to ensure that children and young people learn about appropriate relationships with adults, keeping safe, online safety as well as sex and healthy relationships.

**9.17** Children should be supported by staff to understand what abuse is. Children must be listened to and enabled to report any abuse or neglect at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse. This should include being able to access in private, relevant websites or help lines such as Childline to seek advice and help.

**9.18** The school recognises that some children and young people are more vulnerable by virtue of their complex health or behavioural needs, or disabilities. In these instances, all staff have a responsibility to be the 'eyes and ears' and report all concerns to the Safeguarding Lead.

## **10. Children who go Missing**

**10.1** All staff must be aware of the risks associated with children who go missing from home, and particularly that very often missing incidents are a warning sign of other safeguarding concerns such as exploitation, forced marriage, FGM, substance misuse or mental health problems. The risk of exploitation and abuse increases for those children and young people who go missing from home and school.

Early identification and intervention is a priority.

**10.2** Homes must ensure that all young people at risk of going missing have a clear risk assessment and a clear plan for what needs to be done if the young person goes missing. All staff must sign to show they have read the plan and understand what they need to do. The plans should be agreed with the young person's social worker and, where possible, the young person's parents and the young person themselves.

**10.3** The Safeguarding Lead is responsible for investigating any unexplained absences and for ensuring a 'return from missing' interview is requested from the local authority. Reasonable enquiries must be made to locate a child or young person who is missing and staff are expected to act as a reasonable parent would in terms of actively trying to find and retrieve the young person. The Safeguarding Lead **must** refer any safeguarding concerns regarding the absence of a young person to the local authority. In cases where there are immediate concerns regarding forced marriage or FGM, the Designated Safeguarding Lead must refer to the police immediately. All information **must** be documented on the home's records.

**10.4** Children and young people who are repeatedly missing are at particular risk of harm. Attempts must be made to talk to the child or young person about why they are missing from education. Records must be kept of those discussions. Any safeguarding information which the child or young person discloses must be shared **immediately** with the local authority. If the child or young person discloses immediate safeguarding concerns, the Safeguarding Lead must share this information with the police.

## **11. Exploitation**

**11.1** Exploitation of children and young people is a form of child abuse and can include sexual exploitation or criminal exploitation.

**11.2** All staff **must** know the definitions, signs and indicators of CSE and County Lines. Safeguarding Leads must provide or access ongoing training and learning to staff around exploitation. All staff **must** have training in exploitation.

**11.3** All staff **must** read THE SHIRES Group's Exploitation policy.

**11.4** Staff **must** report concerns regarding exploitation **immediately** to the Safeguarding Lead. Staff must document their concerns on home's records on **the same day**. Where there are immediate concerns relating to children and young people's safety due to exploitation,

Safeguarding Leads must make a same day referral to the local authority and report the concerns to the police as well as to the Assistant Director for Education.

- 11.5** Where there are low level concerns, Safeguarding Leads must document the concerns on a chronology in order to establish a full picture of what is happening for the child or young person. The child's social worker must be kept informed.
- 11.6** It is everyone's responsibility to help children and young people know about grooming and exploitation. Homes must ensure that children and young people know who to talk to if they are concerned about child exploitation.
- 11.7 Female Genital Mutilation**  
Professionals have a legal duty to share concerns regarding FGM with the police.
- 11.8** Staff have a legal duty to share concerns with the Safeguarding Lead and to report any concerns. In suspected cases of FGM, staff must refer to the local authority as well as the police. The Safeguarding Lead will assist and support staff with this.
- 11.9** The Safeguarding Lead must ensure that immediate concerns regarding potential abuse, harm, honour based violence including FGM, forced marriage and breast ironing, CSE and Trafficking or Radicalisation are shared **immediately** with the relevant Head of Care, Assistant Director for Education and that staff have documented them on the home records.

## **12. Preventing Radicalisation**

- 12.1** THE SHIRES Group fully recognises its responsibility to have arrangements in place to safeguard and protect children from radicalisation. This is known as the 'Prevent' duty.
- 12.2** All staff must be aware of the signs and indicators of radicalisation. Staff must be proactive in reporting any concerns, regardless of how small they may be, to the Safeguarding Lead. Safeguarding Leads must assist staff to report all concerns regarding radicalisation to the Police as well as the Head of Care and Principal and Assistant Director of Education. Staff must document their concerns on the home's records.
- 12.3** All staff must be aware of the local procedures relating to reporting radicalisation concerns.

## **13. Physical Interventions**

- 13.1** While every home creates an atmosphere of nurturing, unconditional positive regard and warmth, THE SHIRES Group recognises that on occasion it may be necessary to use physical intervention to keep a child or young person safe. Physical intervention must be a last resort.
- 13.2 All staff must read and know the home's Physical Intervention Policy.**
- 13.3** If a child or young person makes an allegation after a physical intervention, it is important that the member of staff writes down as much information as possible. Staff must complete body maps immediately after the event and record onto home records. Staff must also

verbally inform the Safeguarding Lead/deputy manager. **Medical attention must always be sought for the young person.** Staff must inform their parents or carers and the local authority. Allegations of harm relating to physical interventions must be reported to the Head of Care, Principal and Assistant Director for Education and the Local Authority Designated Officer.

#### **14. Allegations against Staff**

- 14.1** All allegations must be treated seriously. Staff must maintain an open mind and suspend all judgement. Allegations must never be dismissed. When managing allegations, it is important that staff maintain a level of professional curiosity. Staff have a responsibility to look after themselves and not to place themselves into situations which could present as unsafe. Staff must report any concerns to the Safeguarding Lead.
- 14.2** When a child makes an allegation about a member of staff, the member of staff receiving the complaint must write everything down. The member of staff must immediately report the allegation to the Safeguarding Lead or deputy manager. The Safeguarding Lead has a responsibility to take all allegations seriously regardless of whether a child or young person has made previous allegations. The Safeguarding Lead may wish to speak with the LADO and seek advice about next steps on the same day. Allegations must be reported to the Local Authority Designated Officer within one working day. The Safeguarding Lead must ensure that they follow the OFG Group's Managing Allegations Procedure.
- 14.3** If the allegation is regarding the Registered Manager then the Head of Care and Principal and Assistant Director for Education must be informed immediately. They will then seek advice from the LADO.
- 14.4** **All allegations made against staff must be reported to the Assistant Director for Education, THE SHIRES Group's HR Team as well as the Quality Assurance Team within 24 hours. THE SHIRES Group recognises that managing allegations can be challenging and so will support with the process. All allegations must be sent to the secure inbox- safeguardingnotification@nfa.co.uk**
- 14.5** It is the responsibility of the Safeguarding Lead to ensure that all allegations are managed in line with local safeguarding partnership procedures.

#### **15. Working with the Local Authority Designated Officer**

- 15.1** In all referrals, the Safeguarding Lead is the lead professional within the home for ensuring that a timely response is received from the local authority or LADO. If a response is received which the Safeguarding Lead believes is inappropriate and does not prioritise the child or young person's safety, this must be escalated to the Head of Care or Principal to agree further action.

#### **16. Whistleblowing**

- 16.1** Safeguarding is everyone's responsibility. OFG Group recognises that on occasion staff may feel that they are unable to tell someone within their immediate place of work about any

safeguarding concerns that they may have. OFG group also recognises that children will be unable to voice their concerns if they are in an environment where staff also fail to voice their concerns.

- 16.2** All staff have a duty first and foremost to the children in their home. Any concerns, regardless of how small they may seem, must be reported. Safeguarding Leads and Principals have a responsibility to ensure that they create an environment where staff feel safe to openly voice any concerns and that they feel listened to. It is also important that staff feel supported if concerns are raised about them. If staff see or heard about other colleagues practice which they are concerned about, which potentially may cause emotional or physical harm to a pupil, or if the standard of care being provided falls short of expectations, they must report this.
- 16.3** OFG group has an anonymous telephone support system (Safecall) where staff are able to share any concerns that they may have, safely and without fear of reprisal. All whistleblowing concerns will be taken seriously and treated as such.
- 16.4** Staff can call Safecall on **08009151571**, report online **[www.safecall.co.uk/reports](http://www.safecall.co.uk/reports)**, or email **[acorngroup@safecall.co.uk](mailto:acorngroup@safecall.co.uk)**

## **17. Safer Recruitment**

- 17.1** The OFG Group Safer Recruitment Policy sets the processes which must be followed for the recruitment of staff and volunteers.
- 18** **Managing Referrals to Disclosure and Barring Service, Health & Care Professions Council, or other professional bodies including the Care Council for Wales (CCW), and/or the Scottish Social Services Council (SSSC), Northern Ireland Social Care Council (NISCC) or Teacher Regulation Authority.**
- 19.1** A Sub-Committee of the OFG Group Safeguarding & Quality Committee takes an overview of all professional conduct issues to ensure the Group is compliant and consistent with all legal duties relating to referrals to professional bodies and the Disclosure and Barring Service.
- 19.2** OFG Group managers must notify the Safeguarding Sub-Committee of all possible referrals to the Disclosure and Barring Service or any relevant professional body in the UK.
- 19.3** All professional conduct issues which may require a referral to a professional body, whether they relate to safeguarding children or not, must be referred to this sub-committee. For example, a social worker teacher may be prohibited from practicing for a wide range of reasons which do not relate to the safety of children or young people.
- 19.4** The Safeguarding Sub-Committee will support the decision-making process to refer an employee to a professional body / DBS and make it clear who is responsible for the submission of any relevant documentation. This will normally be delegated to a senior manager within the division.

20 All serious incidents must be reported to Ofsted using the Ofsted guidance for reference.

Safeguarding Leads are responsible for ensuring that all serious incidents are notified within 24 hours.

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