

# Safeguarding Children

## Policy Document

*This, and all other policies and procedures, apply to all members of the P3 Group.*

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## 1. INTRODUCTION

In all of its work People Potential Possibilities, “the Charity,” will ensure that the welfare of the child and young person is paramount. A child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people and to recognise, respond to and report any safeguarding concerns. We are committed to practise in a way that protects them.

The Charity will provide its services in environments in which children and young people feel safe, secure, and cared for.

This policy is underpinned by the UN Convention on the Rights of the Child in which Article 19: Protection from Abuse and Neglect requires:

*Governments will do all they can to ensure that all children without exception are protected from physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment, or exploitation, including sexual abuse whilst in the care of parents, legal guardian or any other person who has the care of the child.*

The Charity will comply with this standard in all of the services it delivers. It will comply with its responsibility to safeguard and promote the welfare of children and young people. All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity, have a right to equal protection from all types of harm or abuse.

## 2. WHY DO WE NEED THIS POLICY

The purpose of this policy is to protect children and young people who receive P3 services, including the children of adults who use our services; and

To provide staff and volunteers with the overarching principles that guide our approach to safeguarding.

## 3. SCOPE

This policy applies to all P3 staff, volunteers, and trustees.

## 4. ROLES AND RESPONSIBILITIES

<b>P3</b>	<p>The Charity will ensure that all staff are informed about, understand, and accept their responsibilities regarding child abuse. This will include the forms that it can take, signs and symptoms of abuse and the steps that they must take in recognising, preventing, and reporting child abuse.</p> <p>The charity will ensure that all staff are trained in Safeguarding Level 2 as a minimum and that they understand how this is intrinsically related to Safeguarding and how they are responsible for setting and maintaining these boundaries.</p>
<b>All Staff</b>	All staff must adhere to the 'Relationships with people we work alongside' policy as part of our approach to safeguarding.
<b>National Safeguarding Lead</b>	<i>Designated Person:</i> Esther Barrett is the National Safeguarding Lead. The role of the National Safeguarding Lead is to oversee the Regional Safeguarding Leads, all safeguarding policies, and procedures, and to update on legislation.
<b>Director of Quality, Performance and Safeguarding (DSL)</b>	Esther Barrett ensures compliance with safeguarding at an organisational level including liaison with the charity commission and monitoring this in relation to our internal governance.
<b>The Board of Trustees</b>	The Board of Trustees with support from the ELT and the HR, EDI & S/G Committee will have oversight of all matters relating to the implementation of this policy.

	<p>The Board will receive from the designated person an annual report which sets out and reviews how they have discharged their duties throughout the year.</p> <p>The Board will receive quarterly reporting from the HR, EDI &amp; S/G Committee.</p>
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## 5. HOW THIS POLICY WILL BE IMPLEMENTED

The current version of this policy is available on SharePoint. All new staff must read this policy on induction. This policy is reviewed annually. Staff will receive an email update when this policy is revised or reviewed and should ensure they make themselves familiar with this update.

## 6. DEFINITIONS

For child protection purposes this policy applies (in line with Government definitions) to anyone who is under the age of 18. (For children, who are looked after by a Local Authority in England, this policy applies until the young person reaches 21)

A parent is defined as any person who has parental responsibilities over a child. For example: a mother or father. We will also include in these foster and adoptive parents and carers, including those who may have substantial care of a child.

## 7. POLICY STATEMENT

### **Types of Abuse**

The term child abuse is used to describe ways in which children are intentionally or inadvertently harmed or placed at risk of harm.

Categories of Abuse – there are a number of categories of abuse recognised by legislation, as follows:

**Physical Injury:** This is defined as any injury inflicted or knowingly not prevented by any person having custody or care of a child. Physical abuse is often defined by injuries that cannot be explained by the normal play activities of a child and is defined as hitting or hurting a child on purpose. Can also include fabricated illnesses.

**Neglect:** This is defined as the wilful failure to meet the basic needs of a child, for example, not clothing, feeding, or caring for a child adequately and leaving them without adequate supervision. Self-neglect includes self-inflicted harm and/or injury.

**Emotional Abuse:** This is defined as any abuse or torment which would have an effect on the mental health and wellbeing of a child. Most commonly emotional abuse is categorised as shouting at a child, making a child feel worthless, exposing a child to inappropriate and severe punishment and inconsistency of behaviour towards a child.

**Sexual Abuse:** This is defined as the exploitation of children in order to meet the demands of adults or other children. Sexual abuse may include involvement of children

in masturbation, involvement of children in pornographic activity, including taking pornographic photographs and involving children in watching or viewing pornographic materials, involvement of children in sexual activity, including; rape, sodomy, oral sex, and sexual intercourse with a child, even with their consent.

**Financial or Material Abuse:** including exploitation and pressure in connection to wills, property, inheritance, financial transactions, or a misuse of benefits.

**Sexual Exploitation:** exploitative situations, contexts, and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

**Bullying:** Bullying is defined as any form of abuse of a child which is inflicted upon them by their peers, this abuse can be subtle, including teasing, being ignored, or left out, being pushed, or pulled about, or having money or possessions taken.

**Modern Slavery:** Slavery takes many forms: debt bondage, serfdom, forced marriage and the delivery of a child for exploitation, sexual or otherwise, of that child are all slavery-like practices that are criminalised under the Modern Slavery Act. Forced labour is defined as all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily.

**Radicalisation:** Encouragement or coercion to become involved in extremist activities. Children who are at risk of radicalisation may have low self-esteem, be victims of bullying or discrimination and potentially targeted by extremists who will exploit these vulnerabilities. Signs may be isolating from friends or family, talking as if from a script, a sudden disrespectful attitude, anger, secretiveness.

**Female Genital Mutilation (FGM):** FGM is where a female's genitals are deliberately altered or removed for non-medical reasons. It is also known as 'female circumcision' or 'cutting'. Signs it might be about to happen may include a relative or someone from abroad visiting, a special occasion where a girl 'becomes a woman', an unexpected or long absence from school. This list is not exhaustive. Signs it may have happened could include difficulty walking or standing, spending longer in the bathroom, change in mood, acting differently, a reluctance to go to the doctors. Again, this list is not exhaustive.

**On-line Abuse:** This is the type of abuse that happens on the internet, it can happen across any device that is connected to the internet and occur via social media, texts, emails, on-line chat rooms, gaming, and live streaming sites. Online abuse includes

cyber bullying, grooming, sexting, sexual exploitation, and sexual abuse. Signs may include spending a lot more or a lot less time online than usual, seeming distant or upset, being secretive about who or what they are doing online, have new phone numbers, email addresses.

**Grooming:** This is where someone builds a relationship with a child so they can manipulate, exploit, and abuse them. It can occur online, in person or both. Signs may be secrecy, an older boyfriend or girlfriend, money, mobile phones, or new clothes that can't be explained, being withdrawn, sexualised language or behaviour.

## **Awareness and Responsibilities**

The Charity will ensure that all staff are informed about, understand, and accept their responsibilities regarding child abuse. This will include the forms that it can take, signs and symptoms of possible abuse and the steps that they must take in recognising, preventing, and reporting child abuse.

The charity will ensure that all staff are trained in Safeguarding Level 2 as a minimum and that they understand how this is intrinsically related to Safeguarding and how they are responsible for setting and maintaining these boundaries. All staff must adhere to the 'Relationships with people we work alongside' policy as part of our approach to safeguarding.

*Designated Person:* Esther Barrett is the National Safeguarding Lead. The role of the National Safeguarding Lead is to oversee the Regional Safeguarding leads, all safeguarding policies, and procedures, and to update on legislation.

Esther Barrett ensures compliance with safeguarding at an organisational level including liaison with the charity commission and our internal charity governance.

The Board of Trustees with the support of the Executive Leadership Team will have direct oversight of all matters relating to the implementation of this policy and will be available at all times to provide instructions, guidance, and support for the designated person.

The Board will receive from the designated person an annual report which sets out and reviews how they have discharged their duties throughout the year.

## **Confidentiality**

In the context of Safeguarding, the right to confidentiality can be overridden and certain situations may warrant the sharing of information without consent. This may be in an emergency or life-threatening situation, furthermore the law does not prevent the sharing of information between organisations where public interest outweighs protection of confidentiality, for example a crime could be prevented or has been committed or a person poses significant risk to themselves and/or others. Staff must always discuss this with their manager before sharing information unless the situation is life threatening.

## **Recognition of Child Abuse**

The charity asks staff to highlight any causes for concern to the appropriate person and organisations, we also ask them to record these concerns on the internal safeguarding

log where there are drop down options for staff to choose specific categories and identify the type of abuse they are reporting. However, where this is not clear the main focus should be on raising concerns to the appropriate person and organisation.

### **General Indicators of Concern**

- Unexplained bruises, other injuries, or health problems.
- Unexplained gifts or additional mobile devices.
- Poor appearance or hygiene.
- Recurring health problems that are not treated.
- Young children not meeting their development milestones (particularly if there is no disability).
- Being left alone.
- An unstable environment, e.g. cold, dirty, physically unsafe.
- Pregnancy, sexually transmitted infections, or anal/ vaginal soreness.
- Any signs that a child/ young person is at risk of being subjected to forced marriage or Female Genital Mutilation (FGM).
- Social isolation, extremist language, accessing violent extremist websites, significant change in appearance or behaviour.

The above list is not exhaustive, and staff must use their professional judgement and report anything they find concerning to their line manager.

### **Recording and Reporting of Incidents**

A full written record of all incidents which may indicate child safeguarding concerns will be maintained, setting out what has been said and to whom.

Staff will have due regard to information sharing procedures when communicating about matters of this kind, recognising that the protection of children and young people is always the most important consideration.

If a member of staff suspects that a child is under threat, there are a number of steps that will be taken:

All suspicions will be reported immediately to the staff member's line manager and designated person, who will consider referring the matter to the Local Authority Child Protection Unit/ Police.

Detailed written records of suspicions will be kept, which will include the following information:

- The nature of the suspicion;
- Details of any injury; indicator of abuse;
- Times, dates, and any other relevant information;
- Dates, times, and names of other adults involved with the child who may substantiate the suspicion.

At no time will any undertaking be given to the child or young person guaranteeing confidentiality.

All staff must enter any referrals made in relation to Safeguarding on the Central

## **Disclosure of Abuse**

If a child discloses to a staff member that they have been abused, that member of staff will:

Inform the child that in order to help them you have to tell your line manager / designated person. The member of staff will tell the child who this person is and reassure the child that they have done the right thing in telling the staff member what has been going on.

The staff member must stay calm, not make promises which they cannot keep and offer reassurance and support.

Listen to the child and note down what they say in their own words. It is important at this stage the child is not interrupted and questions are not asked. Record the facts and discussion in the child's own words and give a copy to their manager and the designated person.

Report the disclosure to their line manager, who will discuss the case with the designated person responsible for child protection in the Charity

An immediate referral will be made to the Local Authority and Police (where appropriate) who will investigate the disclosure.

If a member of staff is named in the disclosure, the designated person will be as discreet as possible:

The Board will be informed as soon as possible and, in any case, not more than 12 hours after the police have been informed;

If a member of staff observes another member of staff harming a child, they will report this immediately to their line manager and to the designated person who will act according to the Children and Young Persons Act 2008;

If it is a manager or Trustee who is named in the disclosure, the member of staff will be discreet and contact an alternative manager or HR.

## **Reporting allegations of Abuse against Members of Staff**

The Charity recognises that an allegation of abuse of children made against a member of staff will be made for a variety of reasons and that the facts of the allegation will or will not be true.

It is imperative that those dealing with an allegation maintain an open mind and the investigations will be thorough and not subject to delay.

The Charity recognises that the Children Act 2004 states that the welfare of the child is the paramount concern. But it also recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence, and career. Therefore, those dealing with such allegations within the Charity will do so with sensitivity and will act in a careful, measured way.

## **Disclosure of a Serious Allegation**

Where a disclosure is made of a serious nature that may involve a P3 colleague or volunteer, P3 will immediately form a Serious Safeguarding Review chaired by the DSL involving all relevant leads / directors and the head of governance. This may be a disclosure of a physical, financial, sexual, psychological nature and the decision to progress with this procedure will be made by the DSL and head of governance / COO.

Clear guidance, direction and support will be agreed, and review meetings will be held weekly for the duration of the incident / alleged incident. We will ensure we are supporting and protecting people we work alongside and P3 staff members appropriately and reporting in line with relevant legislation.

## **Disclosure and Barring Service (DBS)**

Duty to refer: The Safeguarding of Vulnerable Groups Act 2006 makes it a mandatory requirement to refer anyone known to pose a threat of harm to a child to the DBS.

The Executive Leadership Team with the guidance of Human Resources will not knowingly approve the employment of anyone who poses a risk of harm to children or vulnerable adults. This includes anyone who is believed to have committed a relevant offence or who has a record of such conduct

The Charity has a legal duty to refer an employee who poses a risk of harm to children or vulnerable adults to the DBS, failure to do so can result in a fine and/or up to 5 years imprisonment. There will be sufficient and solid evidence that the employee poses a risk of harm before they can be referred to the DBS. The DBS will not consider evidence based on rumour or unsubstantiated reports. The Charity will also inform the police and other relevant authorities if it believes that a relevant offence has occurred.

## **Barring Process**

Whenever new relevant information (such as a conviction or caution) becomes known to the Charity, the information will be sent to the DBS. The DBS will consider this information, together with other information known on the individual, and decide whether it indicates that the individual poses a risk of harm to vulnerable groups. If so, the DBS will commence its barring process and the DBS will issue a disclosure certificate to the applicant with the barring information.

The applicant will be advised by the designated person to make a representation to the DBS regarding the barring information. The DBS will assess the barring information and representation and decide whether to bar the applicant. If there is sufficient barring evidence, the applicant will be placed on either the Children's Barred List or the Vulnerable Adults Barred List or both depending on the offence. The applicant will then be removed from regulated activity.

A staff member who contravenes this policy has the right of appeal and will be advised of this right. Serious offences committed against children will lead to instant dismissal and automatic barring. The staff member will have no right to make representations or to appeal against a barring decision.

## **Local Safeguarding Procedures**



Each P3 service delivery area has a specific local reporting procedure that is informed and in line with the local authority guidelines. This includes a clear process map and contact information for key people and/or teams.

The local safeguarding procedure details the specific reporting process, responsibilities, and contact information for key personnel, both internally and externally, including the Local Authority Designated Officer (LADO).

The LADO should be alerted to all cases where it is alleged that a person who works with or has had contact with children as part of the family, they are working with has;

- Behaved in a way that has harmed or may have harmed a child.
- Possibly committed a criminal offence against a child or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk or harm to them.

It is the responsibility of the service manager/co-ordinator to ensure that this information is complete and kept up to date.

All local safeguarding procedures written by P3 are saved locally and are written/updated by the local Head of Community Support services annually, when there is a legislation change, or at contract renewal.

These versions are signed off by the director of quality, performance and safeguarding. All old versions must be archived, and new versions marked clearly in accessible folders for all relevant staff to access.

### **Safer Recruitment and Selection**

The Charity has safer recruitment and selection procedures in place covered by our recruitment and selection policies and procedures (reviewed in parallel with the reviews of this policy) which stipulate the following:

In order to maintain the levels of protection, all persons working with children will have an Enhanced Disclosure through the Disclosure and Barring Service, Children's Barred List checks and have completed an application process, interview and have two references (we will maintain sensitive and confidential use of the applicant's disclosure).

Upon starting employment with P3, staff will receive a copy of P3's Code of Conduct and Safeguarding Policies.

Verification of previous employment history.

Use a variety of selection techniques (e.g. qualifications, previous experience, interview, and reference checks) and Identification checks on any candidate selected for employment.

### **Training**

All staff will receive training as part of their induction and in the form of annual updates to ensure that they are familiar with child protection issues and responsibilities and the

Charity's policies and procedures, with refresher training at least every year.

## **8. LEGISLATION**

- Statutory Guidance "Working Together to Safeguard Children" 2015
- "Keeping Safe in Education" 2015
- Statutory Safeguarding Guidance 2016
- The Children Act 1989
- Children Act 2004
- The Care Act 2014
- The Childcare Act 2006
- Modern Slavery Act 2015
- Human Rights Act 1998
- Convention on the Rights of the Child (UN 1989)
- Children and Young Persons Act 1933
- Children and Young Persons Act 2008
- Protection of Freedoms Act 2012
- A Pathway of Care for Vulnerable Families (0-3) 2011
- Sex Offenders Act 1997
- Sexual Offences Act 2003
- Sexual Offences Act 2003 (Remedial) Order 2012
- Adoption and Children Act 2002
- Education Act 2011
- Female Genital Mutilation Act 2003
- Domestic Violence, Crime and Victims Act 2004
- Serious Organised Crime and Police Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Children and Adoption Act 2006
- Forced Marriage (Civil Protection) Act 2007
- Safeguarding Children: Working Together Under the Children Act 2004
- Home Office circular 16 / 2005 Guidance on offences against children
- Disclosure and Barring Service DBS.gov.uk
- Data Protection Act 2018
- The General Data Protection Regulation

## **9. OFSTED REGULATION STANDARDS**

This policy is aligned with the Ofsted Guide to Supported Accommodation Standards and Quality Standards 2023.

The Regulations Standards relating to this policy are; Regulation: 4, 5, 6, 7, 9, 10, 17-19, 20, 21, 22, 27, 42.

## **10. DOCUMENT CONTROL**

<b>Document Version</b>	<b>V3</b>
<b>Replaces</b>	<b>V1.1</b>
<b>Date of Review</b>	<b>May 2025</b>
<b>Date Published</b>	<b>May 2024</b>