PREMIER
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# SAFEGUARDING POLICY MANUAL

**This a core PCM policy. It provides general guidance and clarifies procedures that colleagues must follow to protect young people and promote their welfare.**

Supported Accommodation
July 2026

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## IMPORTANT INFORMATION

### WORKING TOGETHER TO PROTECT YOUNG PEOPLE FROM HARM

**This is a core policy. It covers a range of safeguarding issues that may impact upon young people accessing our supported accommodation services. Please note that colleagues can access our Safeguarding Essentials Policy, which provides a quick reference guide to core safeguarding duties and responsibilities.**

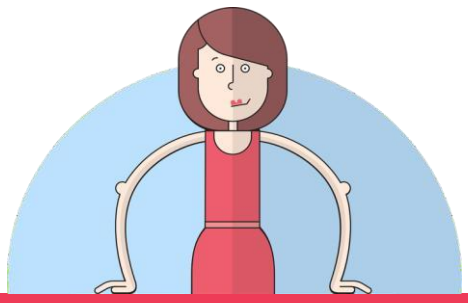
**All colleagues should know from the onset that 'nothing is more important than children's welfare. Children who need help and protection deserve high quality and effective support as soon as a need is identified' (Working Together to Safeguard Children). This expectation is fundamental to our ethos and values.**

**In addition to this policy, colleagues are expected to familiarise themselves with individual safeguarding polices that are available for specific areas of concern. Our safeguarding policies provide contextual information and clear instruction. The aim is to ensure that colleagues understand what they need to do, and importantly why they need to do it.**

### THE DEFINITION OF SAFEGUARDING & PROMOTING THE WELFARE OF CHILDREN

**Safeguarding and promoting the welfare of children is defined for the purposes of KCSIE as:**

- **Providing help and support to meet the needs of children as soon as problems emerge.**
- **Protecting children from maltreatment, whether that is within or outside the home, including online.**
- **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.**
- **Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.**
- **Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.**



**You can navigate this policy by clicking or tapping on sections listed in the Contents Page (P. 2).**
**Click or tap on the PCM logo to return to Contents.**

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## CONTENTS


| | | |
|---|---|---|
| SECTION ONE: | INTRODUCTION | 3 |
| SECTION TWO: | WHAT CHILDREN & YOUNG PEOPLE HAVE SAID THEY NEED | 4 |
| SECTION THREE: | OUR SAFEGUARDING AIMS | 4 |
| SECTION FOUR: | INDICATORS OF ABUSE & NEGLECT | 5 |
| SECTION FIVE: | SAFEGUARDING LEADS | 6 |
| SECTION SIX: | LOCAL AUTHORITY CHILD PROTECTION SERVICES | 9 |
| SECTION SEVEN: | LOCAL SAFEGUARDING PARTNERSHIP BOARDS (LSPBS) | 10 |
| SECTION EIGHT: | ABUSE OF TRUST | 10 |
| SECTION NINE: | ADMISSIONS | 11 |
| SECTION TEN: | ALLEGATIONS & DISCLOSURES | 13 |
| SECTION ELEVEN: | BEHAVIOUR MANAGEMENT | 18 |
| SECTION TWELVE: | BULLYING (INCLUDING CYBERBULLYING) | 21 |
| SECTION THIRTEEN: | CHILD CRIMINAL EXPLOITATION (CCE) | 23 |
| SECTION FOURTEEN: | CHILD SEXUAL EXPLOITATION (CSE) | 30 |
| SECTION FIFTEEN: | CLOTHING & APPEARANCE | 33 |
| SECTION SIXTEEN: | CONFIDENTIALITY | 34 |
| SECTION SEVENTEEN: | DRUGS (SUBSTANCE MISUSE) | 35 |
| SECTION EIGHTEEN: | FIRST AID & MEDICATION | 41 |
| SECTION NINTEEN: | GUESTS (VISITORS & OVERNIGHT STAYS) | 42 |
| SECTION TWENTY: | HATE CRIME | 43 |
| SECTION TWENTY-ONE: | HONOUR-BASED ABUSE (HBA) | 44 |
| SECTION TWENTY-TWO: | INTERNET USE & SAFE COMPUTING (INC. IMAGES & ONLINE ABUSE) | 49 |
| SECTION TWENTY-THREE: | KNIFE CRIME | 56 |
| SECTION TWENTY-FOUR: | LEARNING LESSONS | 57 |
| SECTION TWENTY-FIVE: | MISSING CHILD | 58 |
| SECTION TWENTY-SIX: | ONE-TO-ONE SITUATIONS | 62 |
| SECTION TWENTY-SEVEN: | PHYSICAL CONTACT | 63 |
| SECTION TWENTY-EIGHT: | PHYSICAL INTERVENTION WHEN YOUNG PEOPLE ARE IN DISTRESS | 64 |
| SECTION TWENTY-NINE: | PHYSICAL RESTRAINT | 64 |
| SECTION THIRTY: | PROFESSIONAL JUDGEMENT | 64 |
| SECTION THIRTY-ONE: | PUBLIC CONFIDENCE & PROFESSIONAL STANDARDS | 65 |
| SECTION THIRTY-TWO: | RADICALISATION & EXTREMISM | 66 |
| SECTION THIRTY-THREE: | SAFE RECRUITMENT | 67 |
| SECTION THIRTY-FOUR: | SELF-HARM | 67 |
| SECTION THIRTY-FIVE: | SEXUAL VIOLENCE & SEXUAL HARASSMENT | 68 |
| SECTION THIRTY-SIX: | SUICIDE PREVENTION | 71 |
| SECTION THIRTY-SEVEN: | TRANSPORTING YOUNG PEOPLE | 73 |
| SECTION THIRTY-EIGHT: | VIOLENCE AGAINST WOMEN & GIRLS (VAWG) | 74 |
| SECTION THIRTY-NINE: | WHISTLEBLOWING | 75 |
| APPENDIX: ADDITIONAL ADVICE & GUIDANCE | | |

## SECTION ONE: INTRODUCTION

Premier Care Management Limited ("PCM") have a duty to promote the welfare of any child or young person who accesses our services. This means we have an important responsibility to safeguard young people in our supported accommodation settings. It is the primary duty of all colleagues, and this duty is managed in partnership with other agencies. This policy aims to clarify actions colleagues (i.e., staff, employees, volunteers) must undertake concerning:

- Children and young people up to the age of 18 years (Children's Services).
- Adults of 18 to 25 years (Adult Services) where applicable.

In England for child protection (more generally, safeguarding) "a child is anyone who has not yet reached their 18th Birthday." Where different actions are required for different groups (i.e., Children's Services and Adult Services respectively), this will be clarified accordingly. For the purposes of this policy, the terms "children" and "young people" are used interchangeably.

Safeguarding young people, and promoting their welfare, includes:

- Protecting them from maltreatment or things that are bad for their welfare, their health and their development.
- Promoting their safety and wellbeing.

REMEMBER: No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action.

### KEY PRINCIPLES OF SAFE & EFFECTIVE SUPPORT

Our Safeguarding Policy aims to provide clear guidance and instruction to colleagues regarding PCM's safeguarding measures. The policy references and reflects current legislation and guidance about safeguarding issues and other concerns relating to the protection of vulnerable children. A key part of effective safeguarding is driven by purposeful and focused partnership working, which should be delivered through person-centred collaborative practice. This means:

- Individual colleagues and volunteers must understand that they cannot singularly – on their own – meet the complex needs of children and young people. This means that they must work together to ensure that vulnerable children and young people remain safe from harm.
- In order that collaborative practice is effective, it is vital that every individual working with young people remains aware of the role that they play and the role of other professionals.
- Being clear that effective safeguarding systems are person-centred (i.e., the needs and welfare of the young person must be central to agreed interventions, strategies, and risk mitigation).

## SECTION TWO: WHAT CHILDREN & YOUNG PEOPLE HAVE SAID THEY NEED

**It is clarified form the onset that we have a duty to take the views, wishes, and feelings of children and young people who access our services into account, particularly in relation to matters affecting their support, welfare, and their lives. We have taken the emphasis of 'children have said that they need' within WTSC and used this to inform our approach to safeguarding children and young people. Colleagues are expected to ensure:**

- **VIGILANCE:**
  **To notice when things are troubling children and young people.**
- **UNDERSTANDING & ACTION:**
  **Children and young people are supported to understand what is happening. They are heard and understood and to have that acted upon.**
- **STABILITY:**
  **To develop an on-going stable relationship of trust.**
- **RESPECT:**
  **Children and young people are treated as competent rather than not competent.**
- **INFORMATION AND ENGAGEMENT:**
  **Children and young people are informed about and involved in procedures, decisions, concerns, and plans.**
- **EXPLANATION:**
  **Children and young people are informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response.**
- **SUPPORT:**
  **Children and young people are provided with support "in their own right."**
- **ADVOCACY:**
  **Children and young people are provided with advocacy to help them to offer their views.**
- **PROTECTION:**
  **Children and young people are protected against all forms of abuse and discrimination.**

## SECTION THREE: OUR SAFEGUARDING AIMS

**This policy aims to ensure children and young people are safe and protected from harm. For children and young people, this means emotional, physical, sexual, institutional, and domestic abuse, or substantiated indications of bullying, self-harm, and faltering growth.**

**The next section of this policy seeks to inform colleagues of the indicators associated with abuse or neglect. This will help colleagues to understand not only what children and young people may have already experienced, but also to inform them of the need to remain vigilant to any indications of potential abuse.**

# SECTION FOUR: INDICATORS OF ABUSE & NEGLECT

## ABUSE

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

## PHYSICAL ABUSE

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

## EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, as well as preventing the child from participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

## SEXUAL ABUSE

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

## NEGLECT

**Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It includes self-neglect, and any relate impact of financial abuse. Neglect may occur during pregnancy, for example, 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.**

# SECTION FIVE: SAFEGUARDING LEADS

## KNOWING WHAT TO LOOK FOR IS VITAL TO THE EARLY IDENTIFICATION OF ABUSE & NEGLECT.

**Colleagues should be aware of indicators of abuse and neglect, so that they are able to identify cases of children who may need help or protection.**

**If colleagues are unsure, they should always speak to the Designated Safeguarding Lead (DSL).**

**The overall safeguarding lead is Hayley Williams (Managing Director). She is the Nominated Safeguarding Lead (NSL). Hayley works closely with Dan Newman who is the Designated Safeguarding Leads (DSL) and service manager for Sportfit's Supported Accommodation services and settings.**

| NAME | RESPONSIBILITY | TELEPHONE | EMAIL |
|---|---|---|---|
| Hayley Williams | All services | 0117 967 2020 | Hayley@premiercaremanagement.co.uk |
| Dan Newman | SA (Reg Manager) | 0117 967 2020 | dan.newman@premiercaremanagement.co.uk |

**Dan must inform Hayley of any serious concerns. By working together, both with colleagues and external agencies, we seek to ensure that young people are consistently:**

- **Protected from any form of maltreatment arising from harm.**
- **Prevented from suffering impairment of health or development.**
- **Provided with safe and effective care and support.**
- **Given every opportunity to secure optimum life chances.**

This (above) applies to every area of service provision offered by PCM and extends to all colleagues regardless of their role and responsibilities. We expect that colleagues will speak up if they see or hear anything that could be a potential concern.

**THE DSL MUST BE INFORMED OF ALL CONCERNS, ISSUES, OR INCIDENTS REGARDING YOUNG PEOPLE ACCESSING OUR SUPPORTED ACCOMMODATION SERVICES.**

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding children remains with the DSL.

The DSL has a duty to notify Hayley (NSL) of any serious concerns. Hayley will then notify the Board of Directors to ensure that duties towards maintaining effective corporate governance are maintained, along with crisis management procedures. The purpose will be to ensure that all reasonable measures are set in place to keep young people safe from harm.

## WHAT DOES THE DSL DO?

The purpose of the DSL is to lead in ensuring that appropriate arrangements for keeping young people safe from harm or the potential for harm are in place. The DSL has a responsibility to promote the safety and welfare of young people, always.

### WHAT ARE THE DSL'S MAIN DUTIES & RESPONSIBILITIES?

The DSL must:

- Take a lead role in developing and reviewing safeguarding and child protection policies and procedures in partnership with the Nominated Safeguarding Lead (NSL).
- Take a lead role in implementing our safeguarding and child protection policies and procedures. This means ensuring all safeguarding and child protection issues concerning young people are responded to in a robust, timely and child-centred way.
- Make sure that everyone working with young people understands the safeguarding and child protection procedures and knows what to do if they have concerns about a young person's welfare.
- Make sure young people who access our support know who they can talk to if they have a welfare concern and understand what action the organisation will take in response.
- Receive and record information from anyone who has concerns about a young person.
- Store and retain child protection records (according to legal requirements), and PCM's safeguarding and child protection policy and procedures.
- Work closely with the Nominated Safeguarding Lead (NSL) to ensure they are kept up to date with safeguarding issues and are fully informed of any concerns about organisational safeguarding and child protection practice. (Continued Over)

- Take the lead on responding to information that may constitute a child protection concern, including a concern that an adult involved with PCM may present a risk to young people. This includes:

    i. Assessing and clarifying the information
    ii. Making referrals to statutory organisations as appropriate
    iii. Consulting with and informing the relevant members of the organisation's management, including the Nominated Safeguarding Lead
    iv. Following PCM's safeguarding policy and procedures.

- Liaise with, pass on information to and receive information from statutory child protection agencies such as:

    i. The local authority child protection services; and
    ii. The Police.

    This includes making formal referrals to agencies when necessary.

- Report regularly to the Senior Management Team (SMT) on issues relating to safeguarding and child protection, to ensure that child protection is seen as an ongoing priority issue and that safeguarding requirements are being followed at all levels of the organisation.
- Be familiar with and work within inter-agency child protection procedures developed by the local child protection agencies (i.e., the Local Safeguarding Partnership Board and the Local Authority Designated Officer (LADO) for example).
- Be familiar with issues relating to child protection and abuse, keeping up to date with new developments in this area.
- Attend regular training in issues relevant to child protection and share knowledge from that training with everyone who works or volunteers with or for children and young people, and throughout the organisation.

**The DSL must always seek to ensure that we work together to protect young people.**



## SECTION SIX: LOCAL AUTHORITY CHILD PROTECTION SERVICES

Initiated child protection processes indicate that there are significant concerns about the safety or wellbeing of a young person. The DSL must be notified if colleagues have concerns about the welfare of a young person. If the DSL is not available, colleagues should inform the Management On-Call Service.

The DSL/senior On- Call will co-ordinate a response. In all such cases it is imperative that the following agencies are notified:

### MASH – MULTI-AGENCY SAFEGUARDING HUB.

The Multi Agency Safeguarding Hub (MASH) brings key professional together to facilitate early, better quality information sharing, analysis, and decision-making, to safeguard children, young people, and vulnerable adults more effectively. Within the MASH, information from different agencies will be collated and used to decide what action to take. As a result, the agencies will be able to act quickly in a coordinated and consistent way, ensuring that children and vulnerable adults are kept safe. Please note: Not all local authorities use the term Multi-Agency Safeguarding Hub (MASH) and have provisions that meet "MASH" duties under a different name.

The MASH acts as the first point of contact, receiving new safeguarding concerns/enquiries relating concerns about abuse, neglect, or concerns about potential/actual harm impacting upon children.

### EMERGENCY DUTY TEAM (EDT)

The Emergency Duty Team (EDT) deals with social care emergencies outside office hours involving vulnerable children or adults.

### THE POLICE

Call 999 if a young person is at immediate risk of harm. If colleagues know or suspect that a young person is in immediate risk of significant harm, the Police must be called. All colleagues notifying the Police must inform the DSL/senior On-Call immediately. Accurate records must be taken and retained within the young person's case files.

### LOCAL AUTHORITY DESIGNATED OFFICER (LADO)

Every local authority should have a Local Authority Designated Officer (LADO) or team of officers (either as part of multi-agency arrangements or otherwise). Their role is to be involved in the management and oversight of allegations against people who work with children and young people.

Arrangements should be put in place to ensure that any allegations about those who work with children and young people are passed to the LADO without delay.

## SECTION SEVEN: LOCAL SAFEGUARDING PARTNERSHIP BOARDS

**Every Local Authority in the country must have Multi-Agency Safeguarding Arrangements (MASA) in partnership with the Police and Health. The information provided below confirms arrangements for Bristol City Council's arrangements, with contact details.**

**Anyone who works with children and young people has a role in safeguarding and child protection. You should make a referral to First Response straight away on 0117 903 6444 if your concern relates to a disclosure of abuse requiring a same day response.**

### MAKING A REFERRAL

**To seek advice or make a referral, please contact the LADO. Colleagues can do this by email, telephone or online.**

**Phone | 0117 90 37795 | Email: childprotection@bristol.gov.uk | Website: https://bristolsafeguarding.org**

## SECTION EIGHT: ABUSE OF TRUST

**The Sexual Offences Act 2003 (Sections 16 and 17) respectively are defined as 'Abuse of position of trust: sexual activity with a child' and 'Abuse of position of trust causing or inciting a child to engage in sexual activity.' Abuse of Trust:**

- **Can occur in a number of settings, for example, in an education establishment, a residential establishment, a foster home, a social club or other activity.**
- **Relates to all relationships where one person is in a position of responsibility (and power) in relation to another person, who is either under 18 years or is a vulnerable adult, whether the relationship is of a heterosexual or homosexual nature.**
- **Relates to paid employees, ex-employees, unpaid colleagues (for example trainees and students), volunteers, foster carers, consultants, and contractors.**
- **Occurs where the person in a position of trust betrays the trust and enters into a relationship, particularly a sexual relationship, but also other abusive relationships, with a child/young person or vulnerable adult (referred to as service user), for whom they have responsibility.**

**Abuse of Trust is distinct and different from sexual abuse or other abuse. Sexual and other forms of abuse take place where the victim does not or cannot consent to his or her treatment. There need not be any abuse of a relationship of trust. Any sexual activity which is not freely consenting is criminal.**

In contrast, the sexual activity covered by 'Abuse of Trust' may seem consensual, but it is rendered unacceptable because of relative positions of power. This refers to the potential for people in a 'relationship of trust' to misuse or abuse that relationship.

Colleagues are in a relationship of trust because they have the potential to hold power or influence over young people. This must never be abused.

## PROCEDURES

Basic Principles:

- The need to safeguard and promote the welfare of young people and protect them from sexual activity (from those supporting them within a relationship of trust) is paramount.
- All adults have a duty to raise concerns about the behaviour of colleagues, managers, volunteers or others which may be harmful to a young person, without prejudice to their own position.
- This applies to all adults, regardless of gender, race, religion, sexual orientation, or disability.

All colleagues must be aware that:

- Any form of sexualised activity or behaviour involving a child or young person will not be tolerated. Any colleague proven to be engaged in such activities will be subject to the full rigor of the law.
- Any other inappropriate activities or conduct, such as irregularities with financial support or psychological/emotional abuse, will not be tolerated.

Colleagues must ensure that:

- Psychological, emotional, and mental health needs are included within individual safety planning and risk assessments. All safety planning must be reviewed regularly and made available to all colleagues working with young people in or out of accommodation settings.
- Any concerns about the behaviour or activities of a colleague, visitor or contractor towards a child or young person must be escalated (without delay) to the DSL.

# SECTION NINE: ADMISSIONS

All colleagues, including Directors, must have unwavering regard for the importance of matching referred young people to those already living in the accommodation.

The peer dynamic ("mix of young people") must be considered in terms of the impact of presenting needs, difficulties and any challenging behaviours exhibited by existing young people, and the young person referred. In considering any new referral to the accommodation there must be clear regard to whether colleagues have sufficient skills, experience, knowledge, and qualifications to support each young person.

## PROCEDURES

**For all potentially suitable referrals, the relevant manager (or suitably delegated colleague) must complete:**

- **An effective and robust matching and impact assessment; and**
- **Where appropriate, a risk assessment must be used to ascertain the suitability of Unaccompanied Asylum-Seeking Children (USAC) referred to our services. The risk assessment should include information gathered through face-to-face meeting(s) and any other available information.**

**Additionally, there must be due consideration for the impact of and/or changes made to the annual location assessment to ascertain:**

- **Any arising safeguarding concerns that could impact upon the young people in the setting; and**
- **Changes to accessibility of services.**

**This should help to establish:**

- **If the location of the setting influences the potential for an already vulnerable young person to be a victim of crime, such as being targeted for sexual exploitation.**
- **The likelihood of young people being drawn into gang crime/anti-social behaviour in the local area.**
- **The suitability of the local neighbourhood as a location to support young people who may have a been victims of abuse, neglect, and trauma.**
- **Whether there are environmental factors that would represent a hazard to young people, such as locations near level crossings or busy roads.**

**Colleagues involved in considering referrals must be able to demonstrate that the above conditions have been fully considered. All child protection arrangements, monitoring, reviewing and support mechanisms must be detailed in full in the young people's relevant support plans.**

**Where a placement has been offered and agreed, the following conditions must be applied:**

- **Managers are responsible for ensuring that robust safety planning is completed for each young person, prior to admission.**
- **As the placement progresses safety planning must be reviewed and amended, with meaningful input from the young person concerned:**
    i. **Every calendar month. This is to ensure continued accuracy and effectiveness.**
    ii. **Following a significant event that relates to the safety and welfare of the young person concerned.**
- **Managers must inform all colleagues working directly with young people of any changes made to existing safety planning. Colleagues must be familiar with the conditions of each young person's safety planning before working directly with them.**

**Please note that PCM will not consider a young person for any of our services if we do not believe it would be safe to do so. For further information, colleagues should refer to our Admissions Policy.**

## SECTION TEN: ALLEGATIONS & DISCLOSURES

**There is some debate around what exactly a disclosure is, and the difference between a disclosure and an allegation. In the simplest of terms, a 'disclosure' is usually used within the context of responding from a position of belief. Therefore, a disclosure has "sufficient factual content and specificity." In contrast, an allegation is a claim that someone has committed a crime or perpetrated wrongdoing, though the person making the claim has not submitted any proof. All allegations and disclosures must be taken seriously.**

**For the avoidance of doubt, if an allegation or a disclosure is made by a young person, the procedures clarified in this policy must be followed. A disclosure or allegation made against or about a colleague, regarding their conduct or behaviour towards a young person, must be taken seriously and escalated as a priority.**

### DEFINITIONS

**The following definitions should be used when determining the outcome of allegation investigations:**

- **SUBSTANTIATED: There is sufficient evidence to prove the allegation.**
- **MALICIOUS: There is sufficient evidence to disprove the allegation or a deliberate act to deceive.**
- **FALSE: There is sufficient evidence to disprove the allegation.**
- **UNSUBSTANTIATED: There is insufficient evidence to either prove or disprove the allegation.**
- **UNFOUNDED: To support cases where there is no evidence or proper basis to support the allegation.**

**Details of allegations that are found to have been malicious should be removed from personnel records. For all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action and decisions reached, is kept on the confidential personnel file of the accused person. A copy of which must be provided to the person concerned.**

### PROCEDURES

**The first part of this procedures section refers to managing cases of allegations that might indicate a person would pose a risk of harm if they continued to work in regular or close contact with children or young people in their present position, or in any capacity. It must be used when it's alleged a colleague (or agency staff) has:**

- **Behaved in a way that has harmed or may have harmed a young person.**
- **Possibly committed a criminal offence against or related to a young person.**
- **Behaved towards a young person in a way that indicates they would pose a risk of harm.**
- **Behaved in a way that indicates they may not be suitable to work with children or vulnerable adults.**

**An allegation against a colleague regarding a young person will be referred to the Local Authority Designated Officer (LADO). In all cases, the Police must be called if illegal/criminal activity is suspected, or it is an emergency. This includes historical allegations, as well as allegations against a former colleague.**

# RESPONDING TO CONCERNS ABOUT POTENTIAL HARM OR ABUSE

The below diagram illustrates what action should be taken and who should take it where there are concerns about a child or young person. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services (Social Care). Anybody can make a referral.

**SHARING & RECORDING CONCERNS**
Individual with concerns about a child shares their concerns with the DSL, who records them.
The individual with concerns may refer to Children's Services (Social Care).
Call 999 if the child is at immediate risk or call 101 if you think a crime has been committed.

↓

**CONSIDERATION**
If referred to them, the DSL considers if an early help assessment* is needed or if they should swiftly move to the next step.

↓

**REFERRAL TO CHILDREN'S SERVICES (SOCIAL CARE)**
An individual or the DSL may make a referral to Children's Services (Social Care) & Police

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**CHILDREN'S SERVICES (SOCIAL CARE) CONSIDERATION**
Children's Services (Social Care) decide within one working day what action should be taken, including if an assessment is needed, and feed back to the referrer.

↓

**ASSESSMENT**
Children's Services (Social Care) completes the assessment within 45 working days of the referral. It could be a Section 17 or Section 47 assessment.

**NO REFERRAL TO CHILDREN'S SERVICES (SOCIAL CARE)**
The DSL must continue to monitor the situation.

→

**IF THE CHILD'S SITUATION DOES NOT APPEAR TO BE IMPROVING THE REFERRER SHOULD PRESS FOR RE-CONSIDERATION.**

↑

**NO ASSESSMENT**
If no Section 17 or Section 47 assessment is recommended an early help assessment may be recommended and/or onward referral to other specialist or universal services. Children's Services (Social Care) will feedback to the referrer.

An allegation against a member of staff regarding a child or young person will be referred to the Local Authority Designated Officer (LADO).

THE POLICE MUST BE CALLED IF ILLEGAL ACTIVITY IS SUSPECTED, OR IT IS AN EMERGENCY.

## RAISING CONCERNS & SPEAKING UP

There may arise situation(s) where colleagues have concerns about:

- Any young person's welfare and/or wellbeing.
- Any colleague or the practice of any colleague.
- Any other persons' working with the young person.
- Any other person who has contact with the young person (e.g., a sport coach, scout leader, etc.).
- Any other concerns.

If so, you must SPEAK UP. Colleagues are reminded that failure to speak up [regarding concerns identified or witnessed] will necessitate disciplinary action. Please refer to our Whistleblowing Policy for more information.

## INITIAL CONSIDERATIONS

The procedures for dealing with allegations need to be applied with common sense and judgement. Some allegations may be so serious they require immediate intervention by Children's Services Social Care and the Police as appropriate to the circumstances.

## CONFIDENTIALITY

It is extremely important that when an allegation is made, all colleagues involved make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. This is particularly important because an allegation can have a range of outcomes and:

- Gossip and/or assumption about the allegation(s) can (and will) compromise the process; and
- We all have a duty to safeguard the welfare of colleagues.

Colleagues must note that any such inappropriate comment or discussion will be taken extremely seriously in the event of an allegation.

## RESIGNATIONS & "SETTLEMENT AGREEMENTS"

If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up. A referral to the DBS will be made by the DSL.

If the accused person resigns or their services cease to be used, and the threshold criteria for making a DBS referral is met, it will not be appropriate to reach a settlement or compromise agreement. This is because not complying with a legal duty to make a referral is a criminal offence.

## DUTY OF CARE

**Premier Care Management have a duty of care to our colleagues. We have a responsibility to manage and minimise the stress inherent in the allegations process.**

**Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible. They should be provided with an explanation of the likely course of action unless there is an objection by the children's social care services or the Police.**

**The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer (i.e., +Medicash).**

**The case manager should appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case. They must consider what other support is appropriate for the individual.**

## WHAT TO DO IF A YOUNG PERSON MAKES AN ALLEGATION OR A DISCLOSURE

**The following explains what to do if young person makes a disclosure indicating a risk of harm:**

- **Listen and take seriously what the young person says and never express disbelief.**
- **Do not make any suggestions about what has taken place, or how it came about, or question the young person except to clarify what they are saying.**
- **Allow the young person time to express themselves, but do not press for detail beyond what is minimally necessary to be clear that some form of abuse has taken place.**
- **Do not ask the young person to repeat what has been said to anyone else before referring to the DSL and MASH/EDT.**
- **Be calm and reassuring and do not make assumptions.**
- **Avoid making judgements about what is being said but reassure the young person that they are not responsible for what may have happened.**
- **Do not promise to keep information secret. Make it clear that you will have to refer the matter on and to whom.**
- **Tell the young person that there are people who can help.**
- **Write down what has been said, using the young person's exact words and what was said in response. Be factual, sign and date the report and send to other relevant people, such as social workers.**

All allegations and disclosures must be escalated to the DSL without delay. Where there are immediate concerns, MASH will be contacted and informed of the disclosure. Additionally, LADO will be notified if the information provided related to a colleague. If it is believed a criminal act has taken place, the Police must be called.

## DURING AN INVESTIGATION

Whenever there are concerns of a child protection nature, PCM have a clear duty to inform the Local Authority Designated Officer (LADO). If a criminality is suspected or disclosed, PCM have duty to inform the Police.

The LADO will convene a Section 47 'Strategy Meeting' of all the relevant professionals. They will discuss the allegation and decide the next steps to take. This may involve an "interview under caution" by the Police, and a joint interview of the young person by the Police and local authority.

Once the investigation has been concluded, further strategy meetings will be held until an outcome has been agreed. Colleagues will then be informed of the outcome and advised on the recommendations of the investigation, leading to clarification of any actions that have been agreed in writing.

## LEARNING LESSONS

At the conclusion of a case in which an allegation is substantiated, the DSL should review the circumstances of the case with the case manager and SMT to determine whether there are any improvements to be made to existing procedures or practice. This will help to prevent similar events in the future.

## ALLEGATIONS OR DISCLOSURES INDICATING A CHILD HAS HARMED ANOTHER CHILD

Allegations or disclosures indicating a young person has harmed another young person is commonly referred to as "Peer-on-Peer Abuse." Colleagues must be in no doubt that a minority of young person have the potential to abuse other young person. Colleagues should know the different forms "peer-on-peer" abuse can take, including bullying, sexting, and relationship abuse for example.

Colleagues should know that:

- Abuse to and by young people in our services is wrong and will be taken seriously.
- The needs of both the victim and perpetrator should be fully considered.
- Abuse to and by young people can occur in all settings.

Ultimately, peer-on-peer abuse is abuse. It is not a game. It is not a joke or banter, and it is not funny. It is not a normal part of growing up.

**Action following a concern that a young person is harming (or has harmed) another young person:**

1) **Where abuse by another young person is suspected, alleged and or witnessed, colleagues must immediately inform their line manager or senior on call, who will immediately advise the young person's social worker(s) (and/or the EDT Team if after hours) and contact MASH, the local Police (if criminality is suspected).**
2) **The above agencies will advise on:**
    - (i) **How the immediate circumstances are to be managed.**
    - (ii) **Reach agreement about ensuring that each young person's safety is secured.**
    - (iii) **When and who should action any investigation.**
    - (iv) **Arrangements for the convening of a strategy meeting.**

    **Discussions must take place, decisions made and agreed regarding any immediate arrangements for protecting each person involved.**
3) **If an allegation is made the alleged abuser must not be approached before taking advice from actions as in (1) & (2).**
4) **During (1) identify who is to provide support for each young person involved.**
5) **Consider the safety of other young people and what, if any, immediate action may be necessary to protect them.**

## SECTION ELEVEN: BEHAVIOUR MANAGEMENT

**Young people living in our supported accommodation have a right to be treated with respect and dignity, including in those circumstances where they display difficult or challenging behaviour.**

**Our comprehensive behaviour management policy clarifies that the use of physical restraint is prohibited. However, we recognise that there may be exceptional circumstances where physical restraint could be used, but only where it is considered safe to do so and colleagues have genuine reason to believe a young person is behaving in a way that will result in significant harm to themselves or others. The general context of our support involves colleagues lone working with young people and the use of restrictive restraint in such situations presents as a significant risk – to colleagues and young people. Therefore, if a young person is behaving in a way that will result in significant harm to themselves or others and de-escalation strategies are ineffective, the Police should be called. The purpose will be to safeguard individuals involved, using their discretionary powers to apply an informal resolution response. PCM are clear that we will not criminalize young people unnecessarily.**

### PROCEDURES

**Our safety plans and individual crisis management plans provide essential information about how colleagues should manage the behavior of individual young people individual. The purpose is to promote the welfare of all young people in placement and reduce any associated risks.**

## SAFETY PLANNING

Each young person must have a completed and regularly reviewed Safety Plan, made available on CHARMS. The Safety Plan is, in effect, an overarching risk assessment.

The safety plan identifies any known or potential risks associated with individual young people. It is imperative that all colleagues are familiar with each young person's safety plan.

Each safety plan must be reviewed monthly or following any significant changes in presentation that indicate a change in the level of risk. As such, the safety plan must be regarded as a "live" tool that aims to safeguard young people.

## INDIVIDUAL CRISIS MANAGEMENT

Safety planning should include a clear summary of what should and shouldn't be done for each young person. This will support with reducing potential triggers for dysregulated or challenging behaviour:

- **BASELINE PRESENTATION**
  (i.e., how the child or young person presents) or "What does the behaviour look like?")
- **PRE-CRISIS PRESENTATION**
  (as above)
- **POSSIBLE TRIGGERS**
  (i.e., what may cause or promote challenging or crisis behaviours)
- **ESCALATION**
  (i.e., how the young person presents or "What does the behaviour look like?")
- **OUTBURST**
  (as above)
- **RECOVERY**
  (as above)

In all cases, there should be clear guidance on (a) what colleagues must do and (b) what colleagues must not do. The emphasis is firmly upon the use of strategies to de-escalate potentially challenging situations.

It is imperative that all colleagues working in the setting are familiar with each young person's safety planning, which is stored on CHARMS. This is because knowledge about individual needs and requirements is an essential part of reducing the potential for incidents.

Young people must be consulted and able to participate in the development of their own safety planning, taking account of their views and feelings about their individual circumstances and welfare concerns.

**It is a primary expectation that colleagues will:**

- Be familiar with the conditions of each young person's safety planning on CHARMS.
- Never use force or threatening behaviour.
- Try to defuse (i.e., de-escalate) situations before they escalate.
- Adhere to the expectations, procedures and standards detailed in the Behavior Management Policy.
- Be mindful of factors that may impact upon a young person's behavior (e.g., contact meetings) and where necessary, take appropriate action to reduce the likelihood of crisis or challenging behaviours.
- Never use sarcasm, demeaning or insensitive comments towards young people. This never acceptable in any situation.
- Avoid shouting or any such behaviour that is likely to counter de-escalatory strategies.

**It is the responsibility of the registered service manager to:**

- Ensure that safety planning is completed for each young people, prior to admission and based upon all available information.
- Review, update and amend safety planning as the young person's placement progresses, with meaningful input from the child concerned:

  (i) Every calendar month. This is to ensure continued accuracy and effectiveness
  (ii) Following a significant event that relates to concerns over the safety and welfare of the young person concerned.

- Inform all colleagues working directly with young people of any changes made to existing safety planning.
- Ensure that all colleagues (including bank, and any agency staff) are familiar with the conditions of each young people's safety planning before they work directly with the young people.

## PHYSICAL RESTRAINT

**PCM do not authorise the use of physical restraint unless there are truly exceptional circumstances, and any resulting measure is applied in the strictest conditions of compliance with Regulation 22 (Behaviour Management Policy and Records). In all cases:**

- Physical restraints must not be used by lone working colleagues.
- Physical restraints must not be used by colleagues who have not received training.
- If young people present with violent and threating behaviour that is genuinely considered to place others (or themselves) at risk of harm, the Police must be called.

## SECTION TWELVE: BULLYING (INCLUDING CYBERBULLYING)

**There is no legal definition of bullying. It is usually defined as repeated behavior which is intended to hurt someone either emotionally or physically. Bullying is often aimed at certain people because of their race, religion, gender or sexual orientation or any other aspect such as appearance or disability.**

**Emotional abuse may involve serious bullying (including cyber bullying), causing young people to feel frightened or in danger, or it can be linked to the exploitation or corruption of vulnerable people.**

**Bullying can take many forms including:**

- **CYBER – Abuse on-line or via text message; interfering with electronic files; setting up inappropriate websites; inappropriate sharing of images, etc.; interfering with e-mail accounts.**
- **FAITH-BASED – Negative stereotyping; name-calling/ridiculing based upon religious persuasion and/or identity.**
- **GIFTED & TALENTED – Name-calling, innuendo or negative peer pressure based on high levels of ability or effort; ostracism resulting from perceptions of high levels of ability.**
- **HOMOPHOBIC OR TRANSGENDER – Name-calling, innuendo or negative stereotyping based on sexual orientation or perceived sexual orientation; use of homophobic language.**
- **PHYSICAL – Kicking or hitting; prodding, pushing, or spitting; offensive gestures or intimidating behaviour; damaging or removing property; invasion of personal space; extortion; coercion; other forms of persistent physical assault.**
- **RACIST – Physical, verbal, written, on-line or text abuse; ridicule based on differences of race, colour, ethnicity, nationality, culture or language; refusal to co-operate with others based upon any of the above differences; stereotyping because colour, race, ethnicity, etc.; promoting offensive materials such as racist leaflets, magazines or computer software.**
- **SEXIST – Use of sexist language; negative stereotyping based on gender.**
- **SEXUAL – Unwanted and/or inappropriate physical contact; sexual innuendo; suggestive propositioning; distribution/display of pornographic material aimed at an individual; graffiti with sexual content aimed at an individual. Putting pressure upon someone to act in a sexual way.**
- **SPECIAL EDUCATIONAL NEEDS OR DISABILITY – Name-calling, innuendo or negative stereotyping based on disability or learning difficulties; excluding from activity because of disability or learning difficulty.**
- **VERBAL – Threats or taunts; shunning/ostracism; name-calling/verbal abuse; innuendo; spreading of rumours; glaring; making inappropriate comments in relation to appearance.**

## PROCEDURES

**Immediate action should be taken to protect young people subject to bullying or involved in bullying. In some cases, a meeting will be convened to discuss a plan of action. PCM colleagues will ensure that an action plan to protect the young person from further bullying is in place. This will be produced in consultation with the young person and any other relevant people. The action plan should be completed prior to the strategy meeting (as required) and such a plan must be endorsed by those with legal responsibility. In addition, the person with legal responsibility for the young person who is alleged to have carried out any bullying must be included in the discussions, as appropriate. The registered service manager must ensure that:**

- **Any vulnerabilities and risks associated with bullying are recorded in each person's safety planning.**
- **All incidents or alleged incidents of bullying are recorded in detail, including actions taken by colleagues.**
- **All colleagues working with the young people concerned are informed of concerns around bullying.**
- **The service maintains a "zero tolerance ethos" regarding bullying, whether relating to young people, colleagues or adults and children visiting the accommodation.**

**All colleagues will:**

- **Support young people to take action against bullying and empower them to raise concerns.**
- **Be familiar with the conditions of each person's safety planning, which will identify any vulnerabilities and risks associated with bullying.**
- **Follow our Countering Bullying Policy if they are alerted to instances of bullying.**
- **Complete an accurate record of all bullying incidents, including actions taken by colleagues. If there is a bullying incident, colleagues should clarify the context of entry as being either an (a) Allegation, (b) Incident, or (c) a Precautionary record. The latter (c) refers to entries may escalate towards bullying and therefore require colleagues to monitor/review accordingly. This is because all too often bullying is incorrectly referenced as a cause or impact of an isolated incident, particularly where there is a power imbalance between two young people.**
- **Understand that a bullying incident should be addressed as a safeguarding concern when there is 'reasonable cause to suspect that a person is suffering, or is likely to suffer, significant harm.' In such cases, a strategy meeting will be necessitated.**
- **Notify the DSL of any concerns about bullying (noting that the DSL is the registered service manager).**

**Click on the links below to access more information:**

**NATIONAL BULLYING HELPLINE**

**https://www.nationalbullyinghelpline.co.uk/cyberbullying.html**

**Helpline: 0300 323 0169 Telephone: 0845 225 5787 (Monday to Friday 9 a.m. to 5 p.m.)**

**FAMILY LIVES**

**https://www.familylives.org.uk**

**Helpline: 0808 800 2222 (Monday to Friday 9 a.m. to 9 p.m.)**

## SECTION THIRTEEN: CHILD CRIMINAL EXPLOITATION (CCE)

Child Criminal Exploitation (CCE) is a broad descriptor covering a range of activities that amount to physical, sexual, and emotional abuse to children and young people.

The consistent factor is one where an adult uses a child or young person to undertake criminal activities through manipulation and coercion. CCE is child abuse.

The Home Office defines child criminal exploitation as:

'Child Criminal Exploitation... occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual.

Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children... includes for instance children forced to work on cannabis farms or to commit theft'. 'Criminal exploitation of children and vulnerable adults' (Home Office, 2018)

Typically, CCE is associated with Child Trafficking, County Lines and Modern Slavery. Although it can involve Child Sexual Exploitation (CSE) and Physical Abuse amongst other areas of concern.

This section focuses upon Child Trafficking, Modern Slavery and County Lines.

### CHILD TRAFFICKING

Child Trafficking is defined as the 'recruitment, transportation, transfer, harboring or receipt' of a child for the purpose of exploitation. (Article 3 Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime)

Child trafficking is abuse. Children and young people are recruited, moved, or transported and then exploited, forced to work, or sold.

Children and young people are trafficked for:

- Child Sexual Exploitation (CSE).
- Benefit fraud.
- Forced marriage.
- Domestic servitude such as cleaning, childcare, cooking.
- Forced labour in factories or agriculture.
- Criminal activity (such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft for example).

**What happens?**

- Children and young people are tricked, forced, or persuaded to leave their homes. Traffickers use grooming techniques to gain the trust of a child, their family or their community.
- Traffickers may threaten families.
- Traffickers may promise a child a better future in another place.
- Sometimes families will be asked for payment towards the "service" a trafficker is providing – for example sorting out the child's documentation prior to travel or organising transportation.
- Traffickers make a profit from the money a child earns through exploitation, forced labour or crime. Often this is explained as a way for child to pay off a debt they (or their family) 'owe' to the traffickers.

## MODERN SLAVERY

Modern slavery is when someone has gained control over, or ownership of, another person and is using this power to exploit them. It involved the recruitment, movement, harbouring or receiving of men, women or children using force, coercion, abuse of vulnerability, deception or other means in order to exploit them.

Someone is a victim of modern slavery if they have experienced any of the following:

- Are forced to work because of physical or verbal threats.
- Are owned or controlled by an 'employer', usually through mental, emotional, sexual or physical abuse, or the threat of such abuse.
- Are dehumanised, treated as a commodity, or bought and sold as 'property.'
- Are being held captive, have restrictions placed on their freedom or being moved against their will.

## COUNTY LINES

The following has been adapted from Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance (September 2018).

## WHAT IS COUNTY LINES EXPLOITATION?

County lines is the Police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines."

It involves child criminal exploitation (CCE), because gangs use children and young people to move drugs and money to and from "market locations." These children and young people are referred to as "Bics" by the drug dealers, which is used as a reference to their perceived disposability.

Gangs establish a base in the "market location" that is typically the home of a vulnerable young person or adult by coercion or even violence in a practice referred to as 'cuckooing'.

County lines is a major issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons.

## HOW DOES COUNTY LINES EXPLOITATION AFFECT CHILDREN?

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child (male or female) under the age of 18 years.
- Is exploitation, even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males, or females, as well as other children or young people.
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g., carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want. The exchange can include both tangible (such as money, drugs or clothes) and social/emotional rewards (such as status, protection or perceived friendship or affection).

It is important for colleagues to remember the unequal power dynamic within which this exchange occurs. The receipt of something by a child, young person or vulnerable adult does not make them any less of a victim. Notably, the prevention of something negative can also fulfil the requirement for exchange, i.e., a child or young person may be forced to engage in county lines activity to stop someone carrying out a threat to someone who is close to them.

## TARGETING OF VULNERABLE CHILDREN

Gangs specifically target vulnerable children and those who do not have support networks. Children with special educational needs, mental health problems or disabilities are known to be purposely targeted. Gangs also look for emotional vulnerability, such as children experiencing problems at home, absent/busy parents or bereavement. The gangs seek to fill that emotional gap for the child and become 'their family'.

Male children are more commonly exploited, but female children are also used and exploited by gangs. It is thought that 15-16 years is the most common age for children to be exploited by these gangs but there are reports of children below the age of 11 years being used.

Gangs are increasingly looking to recruit 'cleanskins' (i.e., those with no previous criminal record who are unlikely to be stopped by the Police, including those from white, middle-class backgrounds and from further afield).

## CHILDREN LOOKED AFTER (CLA)

Gangs target looked after children, particularly those in residential children's homes and children in pupil referral units. Children who have been placed out of their home area are particularly vulnerable.

## CHILD SEXUAL EXPLOITATION (CSE)

Although child sexual exploitation (CSE) is not the driving factor in county lines gangs exploiting children, a clear link exists between County Lines and CSE. Girls are typically most at risk, but there is evidence of sexual abuse of boys within County Lines as well.

## GROOMING & COERCION

Gangs often use threats, coercion, and violence to force children to do what they want. They punish gang members for making mistakes or failing to meet drugs sales targets.

The punishments are extremely violent such as stabbings, anal injuries caused by jagged objects and acid attacks. Gangs may also trick children into getting into their debt, for example, by giving them a mobile phone only to later demand repayment for the cost of the phone. The child will then be in 'debt bondage' to the gang, owing it labour or services as security for the repayment for the debt or other obligation.

Peer grooming is common and takes place in schools and via social media. Music videos on YouTube are used to glamorise gangs and to draw in children from wider social and geographical areas. These methods can lead to children firmly believing they have made an active choice to join the gangs and to deny that they have been exploited and, at the same time, leave them so terrified that they will do anything they are told.

## CHILDREN & YOUNG PEOPLE ARE VICTIMS (NOT SUSPECTS)

There is currently poor awareness and understanding of CCE and it is often the case that victims are mistakenly viewed as having made a 'choice' to engage in criminal behaviour.

This is often made more difficult by the child or young person's refusal to recognise themselves as a victim. Comparisons have been drawn between CCE and Child Sexual Exploitation (CSE) and there are calls for CCE to be treated similarly to CSE. Children who are being exploited by gangs for their criminal purposes are victims and they should be safeguarded, not criminalised.

This principle has been enshrined in UK law following the ratification of The Council of Europe Convention against Trafficking in Human Beings which states, 'each party shall, in accordance with the basic principles of its legal system, provide for the possibility of not imposing penalties on victims for their involvement in unlawful activities, to the extent that they have been compelled to do so'.

## IDENTIFYING CCE

It may not be easy to identify that a child is the victim of gang exploitation. However, there are several consistent factors associated with children and young people who have been abused through CCE. They:

- Have been arrested for possession and intent to supply of significant quantities of drugs, particularly heroin and crack cocaine.
- Were arrested away from their own home area.
- Were arrested on public transport, particularly a train.
- Were arrested in a cuckooed address.
- Are in care, particularly residential care or have been in care.
- Were found carrying a weapon when arrested.
- Have an unexplained injury, possibly caused by a knife.
- Were arrested with or are accompanied by older males or females.

Other indicators of gang involvement include:

- Persistently going missing from education or home.
- Regularly being found away from the home area.
- Unexplained acquisition of money, clothes, or mobile phones.
- Excessive receipt of texts and/or phone calls.
- Relationships with controlling and/or older individuals or groups.
- Leaving home and/or care without explanation.
- Suspicion of physical assault and/or unexplained injuries.
- Significant decline in school results and/or performance.
- Self-harm or significant changes in emotional well-being.

## PROCEDURES

### CHILD TRAFFICKING & MODERN SLAVERY

All colleagues must be aware of the following facts:

- (Trafficked) Young people are tricked, forced, or persuaded to leave their homes. Traffickers use grooming techniques to gain the trust of a child, family, or community.
- They may threaten families. (Continued Over)

- Traffickers may promise children education or persuade parents their child can have a better future in another place.
- Sometimes families will be asked for payment towards the 'service' a trafficker is providing – for example sorting out the child's documentation prior to travel or organising transport.
- Traffickers profit from the money a young person earns via exploitation, forced labour or crime.
- Although these are methods used by traffickers, coercion, violence, or threats do not need to be proven in cases of child trafficking - a child cannot legally consent, so child trafficking only requires evidence of movement and exploitation.

If a young person continues to be at risk of harm through trafficking or there remain concerns about a young person's risk of being subject to modern slavery, colleagues must:

- Refer any concerns or disclosures regarding trafficking to the registered service manager (DSL), without delay.
- Ensure that information relating to specific trafficking risks to individual young people are recorded in their safety planning.
- Be mindful of any unusual activity around the accommodation, such as people loitering or watching with no apparent purpose.
- Record accurate and detailed information, including actions taken.
- Inform the young person's social worker/personal advisor of what has happened.
- If the young person is considered to be in immediate danger or there is reason to believe they are being subject to criminal exploitation, the Police and MASH must be informed.

## COUNTY LINES

If colleagues have concerns that a young person may be at risk of county lines exploitation, they must notify MASH/EDT and the Police. The registered service manager (DSL) must be notified immediately, and factual information must be shared with local authority social care services as required. To safeguard young people against county lines, colleagues must remain alert to the following signs and indicators:

- Returning home late, staying out all night or going missing.
- Being found in areas away from the accommodation.
- Increasing drug use or being found to have large amounts of drugs on them.
- Being secretive about who they are talking to and where they are going.
- Unexplained absences from college, training, or work.
- Unexplained money, phone(s), clothes, or jewellery.
- Increasingly disruptive or aggressive behaviour.
- Using sexual, drug-related, or violent language you wouldn't expect them to know.
- Coming home with injuries or looking particularly dishevelled.
- Having hotel cards or keys to unknown places.

**In all cases where concerns are identified, colleagues must:**

- **Ensure the registered service manager (DSL) is notified if they become concerned about a young person because they feel they are being subjected to county lines activities. If out-of-hours, colleagues must contact the management on-call service.**
- **Liaise with the registered service manager (DSL) to consider a referral to the National Referral Mechanism if the young person is thought to have been used for transporting drugs.**
- **Inform the registered service manager (DSL) if a young person makes a disclosure indicating that they are a victim of county lines or that they have been approached by someone (or a group of people) who intend to exploit them through county lines activity.**
- **Undertake training to be alerted to the signs and indicators associated with young people who are at risk of county lines.**
- **Be proactive, non-judgmental, and consistently vigilant to the potential for county lines to impact upon the lives of young people in our accommodation.**

**If a young person says something indicating they are involved with or worried about county lines, colleagues must:**

- **Listen and take seriously what a young person says and never express disbelief.**
- **Do not make any suggestions about what has taken place, or how it came about, or question the young person except to clarify what they are saying.**
- **Allow the young person time to express themselves', but do not press for detail beyond what is minimally necessary to be clear that some form of abuse has taken place.**
- **Do not ask a young person to repeat what has been said to anyone else before referring.**
- **Be calm and reassuring and do not make assumptions.**
- **Avoid making judgements about what is being said though reassure the young person that they are not responsible for what may have happened.**
- **Do not promise to keep information secret. Be clear that you will have to refer the matter on and to whom.**
- **Tell the young person that there are people who can help.**
- **Write down what has been said, using the young person's exact words and what you said in response. Be factual and state opinion (where an opinion is provided), sign, date report and send to social worker.**

## IMPORTANT

**IF A YOUNG PERSON IS BELIEVED TO BE A VICTIM OF CRIMINAL BEHAVIOUR, THE POLICE MUST BE CONTACTED WITHOUT DELAY.**

## SECTION FOURTEEN: CHILD SEXUAL EXPLOITATION (CSE)

CSE can impact upon any child or young person. Children aged between 12 and 15 years are thought to be most at risk, but younger and older children have been identified as victims of CSE.

Children and young people in Care or Leaving Care are thought to be particularly vulnerable to exploitation. They rarely disclose CSE, so colleagues must be aware of the following risk indicators:

- Acquisition of money, clothes, mobile phones (etc.) without plausible explanation.
- Gang-association and/or isolation from peers/social networks.
- Unexplained absences from school, college, or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours.
- Self-harm or significant changes in emotional well-being.

### FURTHER INFORMATION

For more information on CSE, colleagues must refer to our Countering CSE Policy.

This policy includes further guidance and information on the type of offenders and the methods used by offenders to sexually exploit children and young people.

Additionally, the link between CSE and children going missing cannot be ignored. Young people are extremely vulnerable to exploitation.

### PROCEDURES

Colleagues should not assume that girls are the only victims of CSE. Boys have been identified as victims too. This is important, as males are thought less likely to make disclosures about CSE and colleagues should be alert to this.

## PREVENTING CSE

**Please note that colleagues must review each young person's safety planning monthly as a minimum requirement, whilst any young person whose level of risk of CCE is thought to have increased in-between the review schedule must have their safety planning reviewed as soon as possible. Young people should be involved in the safety planning process, where appropriate.**

**Colleagues, in consultation with the young person, concerned must ensure that:**

- **Each young person's safety planning is accessed through CHARMS and should be informed (in part) by the CSE risk level indicators clarified below. There are four ragg-rated categories of risk related to CSE: RED (HIGH), AMBER (MEDIUM), GREEN (LOW) and GREY (NO RISK).**
- **If concerns are identified, a CSE Risk Assessment Tool should be completed to aide completion of the safety planning.**
- **They have access to, and demonstrate sufficient understanding of, each young person's safety planning, specifically regarding those young people with whom they work.**
- **Any concerns about young people presenting in a way that is consistent with 'Indicators of Possible CSE' (Please refer to our Countering CSE Policy) means that due consideration towards making a referral to MASH is considered, as well as informing the Police. In all cases the registered service manager (DSL) must be informed.**

**The following table defines the categories of risk that should be applied to the assessed support needs of the young person:**

## CSE RISK LEVELS

| | |
|---|---|
| **RED**<br>**Significant Risk** | **There is evidence that a young person is currently exposed to Child Sexual Exploitation and the risk to the young person's safety is significant.** |
| **AMBER**<br>**Medium Risk** | **There is evidence to suggest that a young person may be targeted for opportunistic abuse through exchange of sex for drugs or alcohol perceived affection, sense of belonging, accommodation, money, and goods etc.** |
| **GREEN**<br>**Low Risk** | **There is no evidence to suggest that the young person is exposed to CSE, however there are concerns that they may be at potential risk of CSE in the future due to the presence of identified vulnerability factors or warning signs.** |
| **GREY**<br>**No Identified Risk** | **No Evidence of CSE** |

**Colleagues must:**

- Understand the risks of both online and offline CSE. This will be supported through training, coaching and the information included in this policy and our Countering CSE policy.
- Know where and how to access support.
- Work in partnership with relevant agencies to protect young people.
- Provide young people with effective, person-centred support (e.g., around emotions and self-esteem).
- Provide young people with advice and guidance about avoiding dangerous and/or exploitative relationships.
- Provide support that is tailored to the specific circumstances and needs of the young person.

## CSE DISCLOSURES & MAKING REFERRALS

**It is imperative that:**

- If a colleague (or colleagues) become concerned about a young person due to suspicions of CSE they must inform the registered service manager (DSL). If the young person is thought to be at immediate risk of harm, the Police and MASH must be contacted without delay.
- Colleagues inform the registered service manager (DSL) if a young person makes a disclosure or an allegation indicating that they are a victim of CSE or that they have been approached by someone (or a group of people) who intend to cause harm in a way that is consistent with CSE.
- Colleagues undertake training as necessary to be alerted to the signs and indicators associated with young people who are at risk of CSE or abused in this way.
- Colleagues remain proactive, non-judgmental, and consistently vigilant to the potential for CSE to impact upon the lives of young people.

## DISCLOSURES

**If a young person says something that indicates CSE has taken place:**

- Listen and take seriously what a young person says and never express disbelief.
- Do not make any suggestions about what has taken place, or how it came about, or question the young person except to clarify what they are saying.
- Allow the young person time to express themselves', but do not press for detail beyond what is minimally necessary to be clear that some form of abuse has taken place.
- Do not ask a young person to repeat what has been said to anyone else before referring.

(Continued Over)

- Do not ask a young person to repeat what has been said to anyone else before referring.
- Be calm and reassuring and do not make assumptions.
- Avoid making judgements about what is being said and reassure the young person that they are not responsible for what may have happened.
- Do not promise to keep information secret. Make it clear that you will have to refer the matter on and to whom.
- Tell the young person that there are people who can help.
- Write down what has been said, using the young person's exact words and what was said in response. Be factual and state opinion, sign, date report and send to social worker and registered service manager (DSL).

**PLEASE NOTE: All disclosures must be escalated to the DSL without delay.**

**Where there are immediate concerns, Multi-Agency Safeguarding Hub (MASH) must be contacted and informed of the disclosure.**

**IF IT IS BELIEVED A CRIMINAL ACT HAS TAKEN PLACE, THE POLICE MUST BE CALLED WITHOUT DELAY.**

## SECTION FIFTEEN: CLOTHING & APPEARANCE OF COLLEAGUES

**A person's dress and appearance are matters of personal choice and self-expression. However, in a professional domain, adults should dress in ways that are appropriate to their role and this may need to be different to how they dress when not at work.**

### PROCEDURES

**Colleagues are not required to wear a uniform. However, colleagues must wear clothes are/do:**

- Appropriate to their role.
- Not likely to be viewed as offensive, revealing or sexually provocative.
- Not distract, cause embarrassment, or give rise to misunderstanding.
- Absent of any political or otherwise contentious slogans.
- Not considered to be discriminatory and is culturally sensitive.

**As a rule, colleagues should not wear clothes that can be seen "up, down or through."**

## SECTION SIXTEEN: CONFIDENTIALITY

**PCM is a social care organisation. As a Data Controller, PCM holds highly sensitive personal data about children, young people, and their families, as well as colleagues and contractors. This is essential to our business as a responsible provider of social care services, but moreover it is a critical part of keeping service users safe from potential or actual harm.**

**Colleagues are expected to make responsible and informed decisions about when and with whom to share information. If there is ever any doubt, colleagues should seek advice from the registered service manager (DSL), who will liaise with the data Protection Officer (DPO) as required.**

**Working Together to Safeguard Children is clear that:**

- **Effective sharing of information between practitioners and local agencies is essential for early identification of need, assessment, and service provision. Not sharing important information can have the severest of consequences.**
- **Colleagues must be proactive in sharing information as soon as possible in responding to concerns about the safety and welfare of young people.**
- **Information sharing is also essential for the identification of patterns of behaviour when a young person has gone missing.**
- **The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of young people:**

  i. **PCM have a Data Protection Policy in place that sets out clearly the processes and the principles for sharing information. This clarifies how and when information should be shared about young people with others involved in the young person's life.**

  ii. **We are clear that colleagues must never assume that someone else has or will pass on critical information about keeping a child or young person safe. If they feel a young person has suffered/could suffer harm, children's social care and/or the Police must be informed.**

  iii. **A manager must ensure that when a young person is placed from another local authority, all relevant information is shared towards keeping that young person safe from harm.**

  iv. **It is emphasized that it is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a young people provided that there is a lawful basis to process any personal information required.**

## PROCEDURES

Colleagues will have access to confidential information about young people to undertake their everyday responsibilities. Some of this information will be highly sensitive or private. They should never use or share confidential or personal information about any child or young person accessing our care and/or support, noting that the only exception is where there are concerns a child or young person is at risk of harm.

Information must never be used to intimidate, humiliate, or embarrass a young person. Confidential information about a young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the child or young person's identity does not need to be disclosed the information should be used anonymously. All colleagues must:

- Be clear about when information can be shared, and the circumstances of when it is appropriate to do so.
- Treat information they receive about young people in a discreet, and confidential manner.
- Seek advice from the DPO if they are in any doubt about sharing information they hold or where there has been a request for sensitive information.
- Notify the DPO of any potential data breaches.

Colleagues should refer to our Data Protection Policy for more information and guidance.

# SECTION SEVENTEEN: DRUGS (SUBSTANCE) MISUSE

Many young people who use drugs do not become drug abusers or drug addicts in adulthood. However, drug use in adolescence can put a young person's mental, emotional, and physical health at risk of potential harm. In particular, vulnerable young people are at significant risk of ongoing drug abuse and addiction problems that will impact upon their life chances.

Signs of drug misuse can be confused with other problems, particularly as children get older. Any concerns should be discussed with the young person in a safe environment without confrontation or blame.

If a young person is involved with drugs, colleagues must understand that the behaviour is unacceptable, not the young person.

## THE DEFINITION OF A DRUG

'A drug is any substance which affects the way in which the body functions physically, emotionally or mentally and includes tobacco, Alcohol, solvents, over the counter and prescribed medicines, as well as illegal substances.'

- **DRUG USE:**
  Drug-taking by a young person that does not cause any perceived immediate harm – even though it is not acceptable and may indicate heightened risk or the potential for harm - escalating to
- **DRUG (SUBSTANCE) MISUSE:**
  Drug use that harms health and social functioning – either dependant use (physical or psychological) or use as part of a wider spectrum of problematic or harmful behaviour (Definitions used by Standing Conference on Drug Abuse (SCODA) in "Drug related early intervention developing services for young people and families' 1987)

**It is essential to remember that safeguarding the welfare of the young person is paramount.**

## THE LAW

**Misuse of Drugs Act 1971 divides drugs into three classes solely for the purposes of sentencing. They are classified according to their toxic effect, extent of use and danger to society:**

- **CLASS A**
  Drugs include heroin (diamorphine), cocaine (including crack), methadone, ecstasy (MDMA), LSD, and "magic mushrooms."
- **CLASS B**
  Drugs include amphetamines, barbiturates, codeine, cannabis, cathinones (including mephedrone) and synthetic cannabinoids.
- **CLASS C**
  Drugs include benzodiazepines (tranquilisers), GHB/GBL, ketamine, anabolic steroids and benzylpiperazines (BZP).

## SIGNS OF SUBSTANCE MISUSE

**Colleagues should be aware that the use of drugs can have a dramatic effect upon a young person's appearance, peer group and physical health. It is important to be alert to the following signs of potential substance misuse, keeping in mind that these are indicators and not conclusive evidence that a young person is using drugs. However, if colleagues do notice any significant changes consistent with the below list, concerns should be raised with the registered service manager (DSL) and shared with colleagues. All such observations must be fully recorded, documenting action taken.**

- **Evidence of drugs and/or drug paraphernalia (i.e., "baggies" & torn cigarette paper packaging).**
- **Behavioural problems and poor grades in education or training, as well as employment.**
- **Emotional distancing, isolation, depression, or fatigue.**
- **Overly influenced by peers.**
- **Hostility, irritability, or change in level of cooperation around the accommodation.**

(Continued Over)

- Lying or increased evasiveness about after-school or weekend whereabouts.
- Decrease in interest in personal appearance.
- Physical changes, such as bloodshot eyes, runny nose, sore throats, and rapid weight loss.
- Changes in mood, eating, or sleeping patterns.
- Dizziness and memory problems.
- Unusual odour on breath (e.g., marijuana, tobacco).
- Widely dilated pupils even in bright light.
- Pinpoint pupils even in dim light.

## PROCEDURES

Colleagues are expected to actively discourage young people from misusing drugs (Illicit substances). They should ensure that young people are provided with relevant information, guidance, and support, as well as advice on matters concerning drug and substance misuse that is appropriate to their age, needs and understanding.

Responsibilities of Colleagues:

- Risks associated with drug misuse that are specific to individual young people must be documented within their safety planning.
- Attend and take part in relevant training and team meetings.
- Be familiar with our Countering Substance Misuse Policy.
- Significant events regarding drug use or suspicions/allegations of drug use must be recorded, including actions taken by colleagues. Records must be second read by a senior professional before they are sent to social workers or personal advisors.

## AWARENESS & SUPPORT

Colleagues should use opportunities to talk informally to young people about the dangers of drugs misuse. This will promote awareness and helps to arm young people with the skills needed to cope with any pressures they may experience.

Young people with known concerns about substance misuse will receive targeted support. Where other agencies are involved, PCM will work closely with them to ensure consistency of approach.

For example, NHS Inclusion (Recovery Hampshire) provide support for under 25s affected by drugs and alcohol, whereas Hampshire County Council provide help with drug issues and problems. Such facilities are available within all local authorities within which PCM settings are services are situated. In all cases, any additional intervention should be discussed and agreed with the young person's social worker and embedded onto their relevant support plans.

Young people should be provided with:

- **KNOWLEDGE**
  Health, social and legal issues must be considered, especially the understanding of risks, effects and consequences of drug use enabling informed decision making by the young people.
- **SKILL DEVELOPMENT**
  These skills include accessing information, assertiveness, communication, decision-making, negotiating, problem solving and peer pressure.
- **SUPPORT**
  As defined by the conditions of the young person's care plans and through effective partnership working with other agencies.

All young people must be encouraged to develop or maintain a healthy lifestyle from an early age. Colleagues are expected to work closely with the Police and other agencies, such as substance misuse services and specialist Health practitioners as appropriate to meeting the identified needs of individual young people.

## DRUG INCIDENT MANAGEMENT (AGGRAVATING CIRCUMSTANCES)

If a young person is found in possession of a substance (as defined by The Misuse of Drugs Act 1971) and there are aggravating circumstances, colleagues must contact the police (Dialling 999 if it is an emergency).

Aggravating circumstances are defined by the Police as:

- Denial of the offence.
- Concealing a large quantity of drugs upon their person.
- Being involved in a drug incident within the accommodation.
- The amount is larger than for personal use (N.B., Training will be given in this area).
- Suspicion of supplying drugs.
- Possession of a drug with intent to supply another.

The most appropriate colleague on duty should ask the young person the questions below:

- What the substance is? (Identify)
- Who is it for? (Possession or supply)
- Have they got any more?

**PLEASE NOTE THAT IT IS SPORTFIT POLICY TO AVOID THE UNNECESSARY CRIMINALISATION OF YOUNG PEOPLE.**

## DRUG INCIDENT MANAGEMENT (NO AGGRAVATING CIRCUMSTANCES)

**If colleagues suspect a young person is using or concealing drugs, the following conditions must be applied:**

- Colleagues need to ensure the young person's room is searched by at least two colleagues. Please note: Colleagues must not search a young person's room alone. This is because, amongst other reasons, it places the colleague at risk of allegations. All room searches must be recorded in and signed-off by both colleagues and the young person to confirm accuracy.
- All matters arising must be accurately recorded. Colleagues should confirm whether (or not) drugs were located and the reason that a drug related concern was suspected. If a drug is found, a description of substance should be included, as well as who found it and any related circumstances.
- Colleagues must not handle drugs or substances suspected to be drugs. Adults must use gloves and avoid contamination with the skin.
- Any drugs or suspicious substances found must be placed in an envelope or bag and sealed. The envelope or bag should have brief description of substance, it should be signed over the seal with date and time. This should be witnessed and signed by another colleague where possible. The envelope or bag should be stored in the safe. Colleagues will wait for further instruction from the manager, who will liaise with the Police and follow their advice.
- Colleagues must record matters arising from the search in the room search record. A copy of the entry should be made and transferred to the young person's case file.
- The social worker or personal advisor should be notified, and safety planning must be reviewed.
- The young person should be encouraged to seek help from agencies that provide support to people who misuse substances, such as the Matthew Project or Addaction for example.

## DRUG INCIDENT MANAGEMENT (HEALTH CONCERNS)

**Emergency procedure for an unconscious young person**

- If a young person is unconscious, they should be put into the recovery position and an ambulance called immediately.
- If the incident happens during the evening/at night, the senior colleague on-call must be notified.
- A colleague should remain with the unconscious young person until the ambulance arrives.
- If another colleague is available, they should collect any evidence of substance. If the young person is taken to hospital, part of the suspected drug should be given to paramedics as this could help medical professionals to establish the correct treatment.
- The social worker or personal advisor should be notified, and safety planning must be reviewed.
- Domestic cleaning gloves must be worn if removing discarded needles and syringes. The Police will advise on disposal. Gloves must be disposed of after use.

**Emergency procedure for a conscious young person:**

- **Keep the young person calm. Do not chase or excite them, because this could be dangerous.**
- **Call an ambulance if health is thought to be at risk. If unsure contact NHS Direct ((Dialling 111).**
- **If unable to calm the situation, summon the Police.**
- **Notify the registered service manager (DSL). If the incident happens during the evening or at night, a manager on call must be notified.**
- **The social worker or personal advisor should be notified, and safety planning must be reviewed.**
- **Domestic cleaning gloves must be worn if removing discarded needles and syringes. The Police will advise on disposal. Gloves must be disposed of after use.**

## DRUG INCIDENT MANAGEMENT (SEARCHING YOUNG PEOPLE & PROPERTY)

**Young people have the right to privacy for themselves and their property. However, if colleagues believe that dangerous or illegal substances are being stored in a young person's room then the room must be searched.**

**For all room searches, the young person and two colleagues must be present. Room searches must be recorded and signed-off by both colleagues and the young person to confirm accuracy.**

**During the Search:**

- **All matters arising must be accurately recorded.**
- **If a young person is suspected of carrying drugs, colleagues can request that they turn their pockets out. Again, two colleagues must be present. Clothing must not be removed, and colleagues must not attempt to restrain or restrict the freedom of the young person.**
- **If the young person refuses to allow the search, colleagues must inform the Police (having alerted the young person to the fact that they will have no alternative but to inform the Police).**
- **If a young person is carrying out illegal activities within the accommodation (i.e., taking drugs, supplying drugs to others), he/she must be asked to stop, and the Police advised (along with the social worker and responsible parent as appropriate).**
- **If they refuse to hand the substance over, then colleagues should call the Police. The young person should be warned that the Police will be called if they do not hand over the substance(s).**
- **Any substances removed must be stored and dealt with as described (see above).**

## PLEASE NOTE:

**As previously stated, colleagues must not search a young person's room alone. This is because, amongst other reasons, it places the colleague at risk of allegations.**

## DRUG INCIDENT MANAGEMENT (RECORDING)

**All matters arising must be recorded, dated, and signed off. Records should be objective and factually based, avoiding judgement and supposition without rational foundation.**

**All records should be retained in the young person's case files.**

# SECTION EIGHTEEN: FIRST AID & MEDICATION

**Comprehensive guidance and mandatory staff procedures for First Aid and Medication are clarified within our First Aid Policy & our Medication Policy.**

**The following applies to every setting:**

- **FIRST AID**
  **First aid, in common with many other areas of health and safety, is managed on a risk assessment basis. First aid covers the initial and immediate response to an injury, which may involve nothing more than providing a plaster through to trying to stabilise a casualty while waiting for the emergency services.**

- **FIRST AIDER**
  **A first aider is someone who has undergone a training course in administering first aid at work and holds a current first aid at work certificate.**

## PROCEDURES

### FIRST AID

**The manager is the first aid co-ordinator (unless delegated to a suitably knowledgeable colleague) is responsible for:**

- **Ensuring that colleagues know how:**
  a) **To obtain first aid assistance for young people, adults and visitors.**
  b) **To call a first aider.**
  c) **To locate the first aid cabinet.**
- **Knowing where any specific hazards are identified, and that colleagues are made aware of procedures and equipment for dealing with them.** **(Continued Over)**

- Ensuring that there are arrangements in place for identifying colleagues requiring training, in liaison with the Human Resources team/HR legal advice.
- Ensuring that first aid notices are displayed appropriately.
- Ensuring that first aid equipment and the replenishment of first aid supplies is maintained in a regular and timely way.

All colleagues will receive Emergency First Aid at Work Training (EFAW). New colleagues will be trained as soon as practicable. However, they will not be permitted to administer first aid until the training has been successfully completed.

### MEDICATION

Ordinarily, colleagues should not administer medication. Young people will have support to manage their medication as required on an individual basis, but if colleagues are required to administer medication, they must receive relevant training prior to undertaking such a role. The emphasis must be upon supporting the young person to self-administer safely. Young people in supported accommodation should be able to manage their medication on an individual basis. Colleagues must:

- Observe young people self-administering medication, to provide support as required.
- Include any risks associated with medication in the young person's safety planning.
- If administration of medication is required, colleagues must be trained and must ensure accurate records are maintained and retained.
- Store medication on behalf of young people accessing group living supported accommodation services, with recorded consent from the young person's social worker.
- The registered service manager must be informed of any medication accidents, concerns, or incidents.

## SECTION NINETEEN: GUESTS (VISITORS & OVERNIGHT STAYS)

Young people have the right to receive guests, and it is important that they maintain positive relationships with those who are significant to them. The guide to the supported accommodation regulations states: 'In most instances, young people should be allowed to receive visitors where they live. The registered person may - based on the needs of the young people accommodated in a particular setting and on assessed risks to the safety of young people and staff - put arrangements or practices in place for having visitors to the accommodation. For example, some settings may choose to set rules around recording visitor ID, visiting hours, visitor-approved rooms within the setting, pre-approved visitors, the number of visitors at the setting at any given time, or visitors staying overnight at the setting. These practices and any associated policies should be reasonable, not excessive, and for the purposes of safeguarding all people in the setting.'

## PROCEDURES

Colleagues supporting young people must exercise reasonable judgement regarding the risk presented of any potential guest in a group living setting. Reasonable measures must be adopted to promote the welfare of all young people in the accommodation, as well as the colleagues who support them.

The conditions applied to guests should be detailed in the "House Rules" and must be explained during the admission process. The House rules are agreed collectively for group settings, but certain "non-negotiables" will remain in place as would be expected in any accommodation.

Colleagues must be particularly aware of significantly older young people and adults seeking to befriend young people. For example, a girl of 16 years engaged in a "friendship" with an adult of 26 years should alert colleagues to a significant area of concern, such as CSE for example.

If in any doubt, colleagues must raise concerns with the registered service manager (DSL). Colleagues must also be fully aware of the indicators linked to the above safeguarding issues (as referenced in this policy and related safeguarding policies) and are therefore able to make safe and informed decisions.

In all circumstances, any specific arrangements in place for a young person to receive visitors must be risk assessed and in line with the young person. Colleagues must liaise with the young person's social worker if there are concerns about the suitability of a friendship, with concerns escalated to the registered service manager (DSL) if it is considered that there is a potential for harm.

# SECTION TWENTY: HATE CRIME

Hate Crime can be defined as any crime that is motivated by hostility on the grounds of race, religion, sexual orientation, disability, or transgender identity can be classed as a hate crime.

There are three categories of Hate Crime in legislation:

1) Incitement to hatred offences on the grounds of race, religion, or sexual orientation.
2) Specific racially and religiously motivated criminal offences (such as common assault).
3) Provisions for enhanced sentencing where a crime is motivated by race, religion, sexual orientation, disability, or transgender identity.

In most crimes it is something the victim has in their possession or control that motivates the offender to commit the crime. With hate crime it is 'who' the victim is, or 'what' the victim appears to be that motivates the offender to commit the crime.

## PROCEDURES

**Colleagues are expected to:**

- **Take reasonable steps to prevent hate crime by challenging the beliefs and attitudes that can lead to hate crime.**
- **Provide appropriate, person-centred support to young people who have been victims of Hate Crime, as defined by the young person's relevant support plans or any change in presentation.**
- **Raise any concerns with the registered service manager (DSL) who will give due consideration to making a referral to MASH/EDT.**

**Colleagues must:**

- **Ensure that information relating to Hate Crime, as applicable to individual young people, is recorded in their safety planning. This must be reviewed with the young person every month for accuracy and relevance.**
- **Record all allegations, disclosures and concerns relating to hate crime.**

**Serious allegations regarding Hate Crime should be referred to the Police.**

**Colleagues must note that Sportfit is a non-partisan organisation. However, we will not tolerate any form of prejudice or abuse linked to hate crime.**

# SECTION TWENTY-ONE: HONOUR-BASED ABUSE (HBA)

**'Honour-Based' Abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community. These include:**

- **FEMALE GENITAL MUTILATION (FGM).**
- **FORCED MARRIAGE.**
- **PRACTICES SUCH AS BREAST IRONING.**

**Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.**

**All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as abuse.**

**DfE guidance states that 'Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.' (KCSIE)**

# FEMALE GENITAL MUTILATION (FGM)

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured, or changed, but where there's no medical reason for this to be done.

It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

In England and Wales, 23,000 girls under 15 could be at risk of FGM. However, staff must be aware that FGM is not exclusively limited to girls aged under 15 years (World Health Organisation, 2017)).

Communities particularly affected by FGM in the UK include girls from:

- Somalia, Kenya, Ethiopia, Sierra Leone, Sudan, Egypt, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan.

In the UK, FGM tends to occur in areas with larger populations of communities who practise FGM, such as first-generation immigrants, refugees, and asylum seekers. These areas include:

- London, Cardiff, Manchester, Sheffield, Northampton, Birmingham, Oxford, Crawley, Reading, Slough and Milton Keynes.

Risk Factors include:

- Low level of integration into UK society.
- Mother or sister who has undergone FGM.
- Girls who are withdrawn from PSHE (Personal, Social and Health Education).
- A visiting female elder from the country of origin.
- Being taken on a long holiday to the family's country of origin.
- Talk about a 'special' event or procedure to 'become a woman.'

## HIGH-RISK TIMES

This procedure often takes place in the summer, as the recovery period after FGM can be 6 to 9 weeks. Staff should be alert to the possibility of FGM as a reason why a girl in a high-risk group is absent from education, employment, or training.

Although, it is difficult to identify girls before FGM takes place, where girls from these high-risk groups return from a long period of absence with symptoms of FGM, advice should be sought from the police or social services.

**Post-FGM Symptoms include:**

- Difficulty walking, sitting, or standing.
- Spend longer than normal in the bathroom or toilet.
- Unusual behaviour after a lengthy absence.
- Reluctance to undergo normal medical examinations.
- Asking for help, but not being clear about the issue due to embarrassment or fear.

**Longer Term problems include:**

- Difficulties urinating or incontinence.
- Frequent or chronic vaginal, pelvic, or urinary infections.
- Menstrual problems.
- Kidney damage and kidney failure.
- Cysts and abscesses.
- Pain when having sex.
- Infertility.
- Complications during pregnancy and childbirth.
- Significant emotional and mental health problems.

## PROCEDURES

**Colleagues are expected to:**

- Remain vigilant to the signs that FGM may be imminent.
- Remain vigilant to the indicators that a young person may have been subjected to FGM or someone the young person knows may have been subjected to FGM.
- Report to the Police where they discover (either through disclosure by the victim or other evidence) that FGM appears to have been carried out on a girl aged under 18. Colleagues failing to report such cases are likely to face disciplinary action.
- Report to the Police cases where an act of FGM appears to have been carried out.
- Be vigilant to disclosures made by young people regarding siblings and/or friends.

## FGM DISCLOSURES & MAKING REFERRALS

**Any person who is concerned that a young person may be at risk of FGM is able to make a referral to the MASH. We expect that colleagues will inform the DSL, who will be able to ensure that appropriate action is taken. Colleagues must:**

- Inform the DSL if they are concerned about a young person because they are at risk of FGM.
- Inform the DSL if a young person makes a disclosure/an allegation about FGM.
- Ensure that information relating to FGM, as applicable to individual young people, is recorded and RAGG rated in safety planning on CHARMS. This must be reviewed for continued accuracy.
- Record all allegations, disclosures and concerns, including actions taken.
- Notify the Police by calling 101 to report any concerns.

## FORCED MARRIAGE

**Forcing a person into a marriage is a crime in England and Wales. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure.**

**A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage.**

**A person's capacity to consent can change. For example, with the right support and knowledge, a person with a learning disability may move from a position of lacking capacity to consent to marriage, to having capacity. However, some children and adults with learning disabilities are given no choice and/or do not have the capacity to give informed consent to marriage and all it entails. This may include engaging in a sexual relationship, having children, and deciding where to live.**

### CAPACITY TO CONSENT & THE MENTAL CAPACITY ACT 2005

**The Mental Capacity Act 2005 applies to all people aged 16 and over. It aims both to empower people to make decisions for themselves whenever possible and to protect those who lack capacity to do this. The Act starts from the basis that, unless proved otherwise, all adults have the capacity to make decisions.**

**Individuals may lack capacity if they are unable to:**

- **Understand information given to them.**
- **Retain that information for long enough to be able to make the decision.**
- **Weigh up the information available to make the decision.**
- **Communicate their decision to others.**

**Where someone is found to lack capacity to make a particular decision, others may be permitted to make decisions on behalf of that person, so long as any such decision is made in the best interests of the person who lacks capacity. For example, family and professionals might decide that it is in a person's best interest to live in a certain place, even though the person themselves lacks the capacity to consent to such a decision. However, there are certain decisions which cannot be made on behalf of another person, and this includes the decision to marry. There is therefore no legal basis on which someone can agree to marriage, civil partnerships or sexual relations on behalf of someone who lacks the capacity to make these decisions independently. However, families sometimes do believe they have the "right" to make decisions regarding marriage on behalf of their relative.**

**If a person does not consent or lacks capacity to consent to a marriage, that marriage must be viewed as a forced marriage whatever the reason for the marriage taking place. Capacity to consent can be assessed and tested, but it is time and decision specific.**

## PROCEDURES

Good practice in relation to this assistance and support includes:

- Listening to young people and making sure they know how to raise concerns.
- Understanding that in cases of forced marriage, it is important that agencies do not initiate, encourage or facilitate family counselling, mediation, arbitration or reconciliation. There have been cases of individual being murdered by their families during mediation. Mediation can also place the individual at risk of further emotional and physical abuse.
- Being aware that on occasions when an "at risk" individual insists on meeting with their parents, it should only take place in a safe location, supervised by a trained/specialist professional with an authorised accredited interpreter present (not from the same community), as parents will sometimes threaten the individual in their other language.
- Being aware that allowing a victim to have unsupervised contact with their family is normally extremely risky. Families may use the opportunity to subject the victim to extreme physical or mental duress or take them overseas regardless of any protective measures in place.

PCM will provide training and raise awareness about forced marriage for colleagues who support young people at risk of forced marriage.

Colleagues must:

- Inform the DSL if they are concerned about a young person being at risk of forced marriage.
- Inform the DSL if a young person makes a disclosure/an allegation about forced marriage.
- Ensure that information relating to forced marriage, as applicable to individual young people, is recorded in safety planning on CHARMS. This must be reviewed for continued accuracy.
- Record all concerns using CHARMS, including action taken.
- Notify the Police by calling 101 to report any concerns.

# BREAST IRONING

## WHAT IS BREAST IRONING?

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to try to make them stop developing or disappear. The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping.

## BREAST IRONING IS PHYSICAL ABUSE

**Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence.**

## BREAST IRONING IN THE UK

**Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1,000 girls at risk.**

## PROCEDURES

**Colleagues who are concerned that a young person has experienced (or is at risk of) Breast Ironing should alert the DSL immediately, recording all available information in detail. If a young person makes a disclosure regarding a biological sibling (or any other child or young person), a referral to the MASH should be made immediately.**

**Colleagues must:**

- **Inform the DSL if they are concerned about a young person because they are at risk of breast ironing or have disclosed that they have been subject to breast ironing.**
- **Inform the DSL if a young person makes a disclosure/an allegation regarding breast ironing or have disclosed that they have been subject to breast ironing.**
- **Ensure that information relating to breast ironing, as applicable to individual young people, is recorded in their safety planning. This must be reviewed for accuracy.**
- **Record all concerns relating to breast ironing using CHARMS, including action taken.**
- **Notify the Police by calling 101to report any serious concerns indicating that a young person is likely to be harmed.**

# SECTION TWENTY-TWO: INTERNET USE & SAFE COMPUTING (INC. IMAGES & ONLINE ABUSE)

**This section covers a wide range of issues and concerns arising from Internet use, which includes mobile internet enabled technology (i.e., Smartphones, laptops, gaming devices, iPads/tablets, etc.) and static internet enabled devices (i.e., desktop computers, televisions, games consoles, etc.). For clarification, any device that can send and receive images is included within the scope of this section.**

**The risks associated with the use of such devices cannot be overstated. These risks are particularly acute for vulnerable children and young people.**

The scope for benefiting from the use of internet enabled devices is enormous, but we are constantly mindful that there are inherent dangers that are of a severe and profound nature. In addition, we take internet security seriously and colleagues are provided with clear guidance around ensuring up-to-date and effective internet security.

Young people and colleagues are encouraged to use and enjoy internet enabled devices, but this is subject to clear expectations of conduct and the welfare needs and requirements of individual young people. The internet has revolutionised the way we live our lives and can be used as a wonderful resource. However, access to the internet is as dangerous as it is beneficial, as well as being particularly hazardous for any vulnerable person.

## SUMMARY OF RISKS

### INAPPROPRIATE MATERIAL

One of the key risks of using the internet, email or chatrooms is that children may be exposed to inappropriate or illegal material. This may be material that is pornographic, hateful, or violent in nature; that encourages activities that are dangerous or illegal; or that is just age-inappropriate or biased. One of the key benefits of the web is that it is open to all, but unfortunately this also means that those with extreme political, racist, or sexual views can spread their distorted version of the world to vulnerable and impressionable individuals.

### PHYSICAL DANGER

The threat of physical danger is one of the most worrying and extreme risk associated with the use of the internet and other technologies. A criminal minority make use of the internet and chatrooms to contact children with the intention of developing relationships which they can progress to sexual activity or other forms of criminality.

Paedophiles will often target children, posing as a child with similar interests and hobbies to establish an online 'friendship'. These relationships may develop to a point where the paedophile has gained enough trust to meet in person. These techniques are often known as 'online enticement', 'grooming' or 'child procurement.'

### BULLYING (INC. CYBERBULLYING)

Whether via the Internet, mobile phone, or any other method, is another aspect of the use of new technologies that provide an anonymous method by which bullies can torment their victims.

## SIGNIFICANT AREAS OF CONCERN

**The list below comprises a general summary of significant areas of concern relating to internet use, images, and online exploitation:**

- **INTERNET "GROOMING" BY SEXUAL PREDATORS**
  Via social media and messaging apps, including chat rooms, dating apps and online gaming for example.
- **ACCESSING INAPPROPRIATE WEBSITES**
  Such as those containing violence or pornography for example.
- **CYBER-BULLYING**
  Refers to bullying via social media.
- **CYBER-STALKING**
  Refers to covertly tracking or following an individual, usually to gain personal information.
- **EXPLOITATION & MANIPULATION**
  Refers to encouraging vulnerable people to behave in a way that is not appropriate or illegal.
- **REPUTATIONAL DAMAGE**
  Such as uploading materials that could be considered as embarrassing or regretful in the future.
- **RADICALISATION & EXTREMISM**
  An increasingly powerful way to disseminate unacceptable propaganda and ideology (such as that consistent with advocating terrorism for example).

**PCM have a comprehensive range of policies that provide further guidance and insight into the above areas of concern. These include:**

- **Countering Bullying Policy.**
- **Countering Child Criminal Exploitation (CCE) Policy.**
- **Countering Child Sexual Exploitation (CSE) Policy.**
- **Countering Radicalisation Policy.**

**If in any doubt, colleagues are advised to speak with a senior professional/manager. Please note that the above list is not exhaustive.**

## SEXTING

**The ever-increasing use of social media by children and young people continues to increase the risks presented. This is a particular issue/concern regarding vulnerable children and young people.**

**NOTE: SEXTING IS AN AREA OF SIGNIFICANT CONCERN.**

Sexting is linked to bullying, blackmail, and exploitation, as well as being linked to other forms of harm:

- Unwanted attention Images posted online can attract the attention of sex offenders, who know how to search for, collect and modify images.
- Feeling profoundly embarrassed and humiliated. If they're very distressed this could lead to suicide or self-harm.

Sexting is when someone shares sexual, naked, or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages. Sexting may also be called "trading nudes," "dirties" and/or "pic-for-pic."

It's easy to send a photo or message, but the sender has no control about how it's passed on. When images are stored or shared online, they become public. Some people may think that images and videos only last a few seconds on social media and then they're deleted, but they can still be saved or copied by others. This means that photos or videos which a child or young person may have shared privately, could still end up being shared with people they don't know. For example, Screenshots make images permanent, regardless of the App being used.

## UP-SKIRTING

- Up-skirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge or their permission, with the intention of viewing their genitals or buttocks (with or without underwear). It is now a specific criminal offence in England and Wales.
- It can take place in a range of public and private spaces (e.g., buses, nightclubs, restaurants, parties, etc.,).

## THE LAW: INDECENT IMAGES OF CHILDREN (UNDER 18)

The following information clarifies the legal position regarding indecent images of children.

## INDECENT PHOTOGRAPHS OF CHILDREN:

- Under the Protection of Children Act 1978 (as amended), the UK has a strict prohibition on the taking, making, circulation, and possession with a view to distribution of any indecent photograph of a child. Such offences carry a maximum sentence of 10 years imprisonment.
- Section 160 of the Criminal Justice Act 1988 also makes the simple possession of indecent photographs or pseudo photographs of children an offence, with a maximum sentence of 5 years' imprisonment.

**There are defenses for those aged over the age of consent (16) who produce sexual photographs for their own use within a marriage or civil partnership. These defenses are lost if such images are distributed.**

**The term 'making' could include:**

- **Opening an attachment to an email containing an image.**
- **Downloading an image from a website onto a computer screen.**
- **Storing an image in a directory on a computer.**
- **Accessing a website in which images appeared by way of an automatic "pop up" mechanism.**

**Types of examples covered by these laws could include the following:**

- **A person under the age of 18 who creates, possesses and/or shares sexual imagery of themselves with a peer under the age of 18 or adult over 18.**
- **A person under the age of 18 who possesses and/or shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult over 18.**
- **A person over the age of 18 who creates, possesses and/or shares sexual imagery of a child.**

**Get more information and support from:**

- **INTERNET WATCH FOUNDATION**
  **An independent charity that aims to help victims of child sexual abuse worldwide by identifying and removing online sexual imagery of under 18s, offering a place for the public to report suspected indecent images of children anonymously.**

- **MARIE COLLINS FOUNDATION**
  **A charity enabling children who have suffered sexual abuse and exploitation online to recover and live safe, fulfilling lives.**

- **NATIONAL CRIME AGENCY CEOP**
  **A command of the NCA working with child protection partners across the UK to identify and eradicate threats to children.**

- **NSPCC**
  **A charity working to protect children and prevent abuse.**

- **STOP IT NOW!**
  **A child abuse prevention campaign and anonymous helpline for individuals worried about their own sexual thoughts or behaviour towards children or that of others.**

## PROCEDURES

**The scope for benefiting from the use of computers is enormous, but we are constantly mindful that there are inherent dangers in using computers that are severe and profound.**

**Young people and colleagues are encouraged to use and enjoy computing resources, but this is subject to clear expectations of conduct.**

**The internet has revolutionised the way we live our lives and can be used as a wonderful resource. However, access to the internet is as dangerous as it is beneficial, as well as being particularly hazardous for vulnerable young people.**

**Colleagues must be vigilant to the dangers of potentially criminal online abuse and cyber-bullying. The following provides colleagues with important information about protecting young people from potential online abuse and providing them with the support required to keep them safe and make positive choices.**

**All colleagues must take reasonable steps to:**

- **Ensure that young people are not exposed to unsuitable material on the internet.**
- **Make time to explore and discuss the online world together.**
- **Talk with young people about staying safe online.**
- **Follow safety planning and guidelines regarding known restrictions.**
- **Agree rules with young people, from the onset, about what's okay and what's not okay.**
- **Ensure that young people requiring support when accessing the internet through PCM computer systems are monitored when using PCM equipment/assets.**
- **Ensure that information relating to specific risks to individual young people are recorded in safety planning. This must be reviewed every month for accuracy and relevance.**
- **Raise any concerns regarding inappropriate internet use with the DSL immediately.**
- **Record all concerns relating to internet use, including actions taken.**

## THE INTERNET & STAFF CONDUCT

**FACT: There are no circumstances that will justify adults possessing indecent images of children or young people, specifically those aged below the age of 18 years.**

**Adults who access and possess links to such websites will be viewed as a significant and potential threat to young people in our accommodation. Accessing, making, and storing indecent images of children (under the age of 18 is illegal). This will lead to criminal investigation and the individual being barred from working with children or young people if proven.**

Where indecent images of children or other unsuitable material are found, the Police and the Local Authority Designated Officer (LADO) will be immediately informed. Colleagues must not attempt to investigate the matter or evaluate the material. This may lead to evidence being contaminated, leading to a criminal prosecution.

Therefore, colleagues must:

- Ensure they keep data safe and secure.
- Always conduct themselves professionally online.
- Never take pictures of young people without their permission and the authorisation of the manager/team leader (or On-call out-of-hours).
- Never view or possess inappropriate or indecent images of young people. If a young person discloses or alleges a concern, do not encourage the young person to show [you] the image.
- A description will be adequate, and the device will need to be handed over to the Police.
- Additionally, the gender of the young person should be a serious consideration. For example, a female young person making a disclosure will likely feel more at ease with a female colleague.
- Not allow young people to access to their data through social networking sites such as Facebook (Colleagues must decline "friend requests" from young people because this is not appropriate and will present as a risk to the young person/people concerned).
- Not place details of their place of work on their social networking profiles. This means referring to their job as "working in a social services organisation" or ideally, as "not disclosed."
- Inform a senior colleague of any issues of concern.
- Report any illegal or suspicious internet activity to the Police.

Colleagues must never:

- Display or distribute images of young people unless they have consent to do so.
- Use images which may cause distress.
- Use mobile telephones or any other similar devices to take images of young people.
- Take images 'in secret' or taking images in situations that may be construed as being secretive.

Colleagues are expected to:

- To justify images of young people in their possession in no uncertain terms.

## ONLINE EXPLOITATION

Online exploitation is when an individual or group use online platforms to take advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual and/or criminal activity that can occur online and offline.

**PLEASE NOTE: All disclosures relating to online exploitation must be escalated to the DSL without delay. Where there are immediate concerns, MASH will be contacted and informed of the disclosure. If it is believed a criminal act has taken place, the Police must be called.**

## SECTION TWENTY-THREE: KNIFE CRIME

**Our role – the role of colleagues – is to protect young people accessing our support from potential harm. We can do this by actively listening to young people, talking openly about the risks and by developing a preventative approach that builds young people's knowledge and skills so that they are well supported to keep themselves safe as they into adulthood.**

**As consistently reiterated throughout this policy, the need to share information with relevant professionals and secure effective collaborative practice is essential. This means regular contact with education providers, partnership working with relevant agencies and maintaining a consistency of approach. Colleagues should know that knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults and knife-carrying. However, there are many different criminal offences relating to knives. For example:**

- **It is an offence to threaten or cause harm to a person with a bladed weapon.**
- **Some bladed weapons are prohibited from being sold or purchased, including to anyone under the age of 18.**
- **Offences such as robbery or assault can be aggravated if a knife is involved.**
- **It is also an offence to carry a knife in a public place without good reason.**

**Colleagues should be aware that:**

- **The highest level of risk posed by the use of knives relates to young people who have been groomed into gangs, for the purposes of criminal exploitation.**
- **Working together with other agencies, such as relevant local authority professionals, colleges and colleagues is crucial to minimise risk and incidents associated with knife crime.**
- **Working with local community safety partnerships should support the development and implementation of local strategies that aim to address knife crime and serious youth violence. Linking in with other local groups, where appropriate, will support greater knowledge and insight into areas of risk and therefore support the protection of young people accessing our support services.**
- **The Police will help with introducing and maintaining risk reduction measures. For example, the Police may be willing to provide information directly to young people and colleagues in the accommodation (depending upon resources and availability).**
- **The need to support and educate young people to understand the dangers of knife crime is crucial.**

## PROCEDURES

**Any concerns about young people carrying knives or bladed weapons must be:**

- **Escalated to the DSL immediately, who may inform MASH/EDT of concerns arising. This is particularly important if the young person is Absent without Authority or Missing from Home (MfH) and known to be carrying a knife or bladed weapon.**

**Please note that colleagues are expected to use On-call if the DSL is unavailable.**

**In liaison with the DSL or On-call, colleagues must:**

- **Complete a record using CHARMS, including all details of what was seen, said and done.**
- **Inform the young person's social worker.**
- **Decide, based upon the context of the concern, about whether or not to notify the Police. For example, a young person keeping a butter knife in their room for protection is different to a young person walking around with a carving knife with an intention to harm another person. Please note that this statement should not undermine the importance of discovering a young person with a butter knife, which must still be taken extremely seriously.**

**REMEMBER: There are several potential associations with other safeguarding concerns, such as Child Criminal Exploitation (CCE). PCM are committed to ensuring that young people are not only considered to be safe, but importantly that they feel safe.**

# SECTION TWENTY-FOUR: LEARNING LESSONS

**When things go wrong, we must take every opportunity to learn lessons to ensure that every reasonable measure and strategy is in place to avoid a repeat of the issue or incident. It is crucial to enabling safer servicers and provisions. A failure to learn lessons is irresponsible and potentially dangerous, and it counters the ethos and values that drive our commitment to achieving excellence.**

## LEARNING LESSONS

**The DSL should review the circumstances of the issue or incident with the case manager and SMT to determine whether there are any improvements to be made to existing procedures or practice. This will help to prevent similar events in the future. To capture lessons learned, PCM must keep a record of:**

- **A concise summary of what happened, and any action taken.**
- **The proposed/actual impact of completing the actions, and how this will improve practice.**

**The overriding emphasis is about how we actively engage with opportunities to improve practice to keep our children safe from actual harm, and the potential for harm.**

## SECTION TWENTY-FIVE: MISSING CHILD

There are times when a young person may take it upon themselves' to leave the accommodation and either knowingly or unknowingly place themselves at risk of harm. For example, a young person could be involved in gang crime, substance misuse or at serious risk of exploitation. Children and young people in Care or Leaving Care are thought to be particularly vulnerable, and colleagues must remain vigilant to risks associated with young people. For more information, colleagues should refer to our Missing Policy.

Accepting the above, colleagues must clear from the onset that young people accessing our accommodation should be free to come and go as they please, subject to the agreement of house rules in place to ensure or minimise disruption to other young people. Therefore:

- Colleagues do not have any right to prevent a young person from leaving the accommodation.
- Colleagues may request that a young person advises of when they return but must not demand or expect that this information will be provided.
- If a young person does not return as anticipated, colleagues should call the young person to ensure that all is well and that they feel safe. If made aware of where the young person is, but that young person has not returned as previously indicated, it should be recorded as 'Absent' (N.B. Not 'Absent without Authority').
- If a young person was due to return at a specific time and the whereabouts of the young person cannot be established or contacted, staff must refer to the conditions of the young person's Safety Plan (specifically regarding action required if they are missing.
- Colleagues must remain aware of any increase in [actual] missing incidents, noting that if a young person is frequently missing, it could indicate that an unregulated placement is not appropriate and (a) a multi-agency risk management strategy is required, or (b) that a placement in supported accommodation may not be appropriate (and a Care placement could be required, for example).

### WHAT HAPPENS IF A YOUNG PERSON GOES MISSING

Taking full account of the above, if it is considered that a young person could go missing from home and in doing so place themselves or others at risk of harm, specific measures must be taken to address any arising safety concerns. This may mean that MASH/EDT should be informed, as well as the Police if:

- The young person is thought to be at immediate risk of harm or there is a strong likelihood of harm. This may be to do with engagement with people who would seek to do harm; or
- If the young person presents with behaviours that would indicate a strong likelihood of significant self-harm or suicidal ideation.

Safety planning must be in place for all young people and all colleagues must be aware of any indications or signs, behaviours or triggers that could result in a young person going missing and being at significant risk of harm.

If colleagues suspect that a young person will be at serious risk of harm if they leave the accommodation, they must not restrict the liberty of the individual young person. This means that colleagues must not physically prevent a young person leaving or order them to stay. Colleagues can/should attempt to persuade the young person to remain at the accommodation and offer support, but they must not be prevented from leaving through physical intervention or direct instruction.

Should a young person or young people leave the accommodation in circumstances indicating that there is a strong likelihood of harm, colleagues must ensure the relevant authorities are notified immediately. This is particularly important if the young person's safety planning (ON CHARMS) indicates they are RAGG rated **"RED"** or **"AMBER"** for the missing incidents, as this should be aligned with the National Statutory Guidance on Children who Runaway or Go Missing from Home or Care (DfE, 2014). This guidance covers a range of children's services sectors and agencies, as well as the Police (who 'should read [this guidance] in conjunction with Authorised Professional Practice Guidance on Missing Persons').

## DEFINITIONS

Colleagues should be aware that there are definitions of 'missing' and 'absent' in relation to children, young people and adults reported as missing to the Police. These are:

- **MISSING:** anyone whose whereabouts cannot be established and where the circumstances are out of character, or the context suggests the person may be subject of crime or at risk of harm to themselves or another.
- **ABSENT:** if a young person's whereabouts is known or thought to be known, but unconfirmed, they are not missing. In this case the young person is absent. If the young person remains absent for over six hours, the category will be escalated to 'Missing.'

## PROCEDURES

Essential response to concerns about a young person's welfare:

- Never encourage a young person to leave the accommodation when heightened or angry.
- Report any serious concerns regarding safeguarding and child protection to the DSL without delay, or the On-Call management system if out-of-hours. (Continued Over)

- Report to the Police, using a Resident Early Assessment Form (if available) if there is good reason to suspect that the young person will be at risk of harm and/or a crime may be committed.
- Ensure that information relating to individual young people about going missing are recorded and RAGG rated in their safety planning. This must be reviewed monthly.
- Complete a record outlining what happened (a) leading up to the incident, (b) what happened when the young person was identified as missing, and (c) any action in response to the arising concern(s).
- In partnership with the commissioning authority, the registered service manager must consider whether the young person remains suitable for supported accommodation (and a Care placement could be required, for example).

## CORE RESPONSIBILITIES

Any instances where a young person is considered as missing and there is a likelihood of potential harm, must be treated as a priority.

Young people who leave the setting without the knowledge of colleagues will be regarded as at immediate risk of potential harm if:

- Their whereabouts is unknown, they have not returned when they said they would; and
- They are RAGG Rated as either **RED** or **AMBER**.

As soon as colleagues become aware that a young person is missing, they must:

- Inform the manager or the On-Call senior professional and MASH/EDT.
- Follow the any advice or direction provided, including the need to contact the Police to report the young person as missing - stating the young person's risk category as necessary. If in any doubt, notify the Police anyway because the safety of the young person must remain paramount.
- Continue to attempt contact the young person by phone, and/or known contacts and friends to locate them.

## RECORDING

All incidents where a young person is identified as MfH must be recorded in writing using CHARMS. All details should be recorded. All records must be copied to the young person's individual case file.

Colleagues must take particular care to state the time they were discovered as or thought to be missing, and the time the incident was reported to the Police, the circumstances surrounding the absence, and their return to the accommodation. All entries must be signed by a colleague and the young person's views and feelings about what happened must be documented.

Colleagues should take care to incorporate any new information gained through the experience of the young person going missing into their safety planning. This refers to antecedents (i.e., "what happened before"), changes in presentation or circumstances and known associates/peers who could encourage or manipulate a young person into going missing.

## "SAFE & WELL" CHECKS

If the Police have been involved, "Safe and well" checks should be carried out by the Police as soon as possible after a young person reported as missing has been found. Their purpose is to check for any indications that the young person has suffered harm, where and with whom they have been, and to give them an opportunity to disclose any offending by or against them.

## INDEPENDENT RETURN INTERVIEWS (IRIs)

When a young person is found/returns colleagues should take reasonable action to ensure they are offered an Independent Return Interview (IRI). Independent return interviews provide an opportunity to uncover information that can help protect children and young people from the risk of going missing again, from risks they may have been exposed to while missing or from risk factors in their home.

This interview should be carried out within 72 hours of the young person returning to the accommodation. This should be an in-depth interview and is normally best carried out by an independent person (i.e., someone not involved supporting the young person, such a local authority commissioned service).

## ASSESSING THE RISK OF FURTHER INCIDENTS

Management must remain aware that if a young person is frequently missing, it could indicate that an unregulated placement is not appropriate. This means:

- A multi-agency risk management strategy is required, or
- A placement in supported accommodation may not be appropriate (and a Care placement could be required, for example). Sportfit must ensure that the registered service manager notifies the commissioning authority of the concerns and (in partnership) consider whether the young person remains suitable for supported accommodation.

If a young person has isolated incidents of going missing, or episodes are rare, colleagues must review their safety planning and consider the young person's:

- Individual circumstances, including family circumstances.
- Motivation for running away.

(Continued Over)

- Likely destinations and associates, as well as any pattern of absences.
- Circumstances in which the young person was found or returned.
- Individual characteristics/risk factors (i.e., learning difficulties, mental health issues, depression, etc.).

**Following the safe and well check and independent return interview, staff should share information and work with local authority children's services, the Police, and other agencies (if appropriate) to:**

- Build up a comprehensive picture of why the young person went missing.
- Understand what happened while they were missing.
- Understand who they were with when they were missing and where they were found.
- What support they require upon returning to the accommodation.
- Assist in support planning and risk assessment strategies.

**Learning from previous incidents where young people have gone missing, will help to prevent further incidents.**

## SECTION TWENTY-SIX: ONE-TO-ONE

**It is not realistic to state that one-to-one situations should never take place. In considering any decision for 'one to one' working, the protection and safe care of the young person and the safety of colleagues must be the primary consideration.**

### PROCEDURES

**All colleagues will:**

- Ensure that when lone working is an integral part of their role, an appropriate risk assessment should be agreed.
- Take part in lone working training when available or requested.
- Avoid meetings with young people in remote, secluded areas.
- Always inform colleagues about the contact(s) beforehand, assessing any risks.
- Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy.
- Always report any situation where a young person becomes distressed or angry to the registered service manager. (Please refer to out Behaviour management Policy)
- Carefully consider the needs of the young person when in one-to-one situations.

**Colleagues must:**

- Abide by the conditions of each young person's safety planning.
- Complete a record using CHARMS if there are any significant events arising from 1:1 contact.
- Refer to the registered service manager if a concern is raised made during one-to-one situation.
- Include one-to-one situations in the young person's safety planning if there is thought to be an identified risk (i.e., the young person could take advantage of new or inexperienced colleagues).

## SECTION TWENTY-SEVEN: PHYSICAL CONTACT

**Colleagues must always act respectfully and maintain professional boundaries in relation to any physical contact they may have with any young person we support. It is likely that the young people we support may have been subject to inappropriate approaches from adults (whom they trusted), which may have included physical and sexual contact from adults resulting in physical and sexual abuse.**

**REMEMBER: Colleagues are in a position of trust and power and that this brings considerable professional responsibilities about their practice and conduct.**

### PROCEDURES

**Colleagues must always act and maintain professional boundaries in relation to any physical contact they may have with any young person who accesses our services.**

- Colleagues must be always mindful of the need to maintain professional boundaries in relation to any physical contact with young people.
- Colleagues must respect a young person's personal space and not 'invade' this without good cause.
- Colleagues must SPEAK UP if they have any concerns about any adult and physical contact with any young person. This includes low-level concerns and those that would meet the harm threshold. (Refer to our Low-Level Concerns Policy and/or or Allegations Policy for further information).
- Colleagues must avoid being overly familiar with any young person.
- Colleagues must be mindful of any tactile behaviour that they, adults and young people have and ensure that appropriate professional and physical contact boundaries are maintained.
- Colleagues must only physically comfort a young person only in the presence of other colleagues.
- When colleagues are on their own with young people, they must avoid all physical contact.
- The registered service manager must ensure that all colleagues have regular supervision so that any issues concerning physical contact can be discussed.
- The registered service manager and colleagues must ensure that all young people know how to complain, and are encouraged to speak up, should they have concerns about any adult.

## SECTION TWENTY-EIGHT: PHYSICAL CONTACT WHEN YOUNG PEOPLE ARE IN DISTRESS

There may be occasions when a distressed young person needs comfort and reassurance. This may involve physical contact. Colleagues should use their professional judgement to comfort or reassure a young person in a way that is appropriate, whilst maintaining clear professional boundaries.

### PROCEDURES

Colleagues must:

- Consider the way in which they offer comfort and reassurance to a distressed young person and do it in a way that is appropriate to their individual needs and requirements.
- Take care in offering reassurance in-one to-one situations, and always record actions.
- Never touch a young person in a way that may be considered indecent or inappropriate.
- Record and report situations that may give rise to concern from either part.
- Must never assume that all young people seek or require physical comfort if they are distressed. It is more likely that they would require time, space, and advice/support.

## SECTION TWENTY-NINE: PHYSICAL RESTRAINT

The use of physical restraint is prohibited. However, we recognise that there may be exceptional circumstances where physical restraint could be used, but only where it is considered safe to do so and colleagues have genuine reason to believe a young person is behaving in a way that will result in significant harm to themselves or others. The general context of our support involves colleagues lone working with young people and the use of restrictive restraint in such situations presents as a significant risk – to colleagues and young people. Therefore, if a young person is behaving in a way that will result in significant harm to themselves or others and de-escalation strategies are ineffective, the Police should be called. The purpose will be to safeguard individuals involved, using their discretionary powers to apply an informal resolution response. PCM are clear that we will not criminalise young people unnecessarily. Colleagues must refer to our Behaviour Management Policy for further information.

## SECTION THIRTY: PROFESSIONAL JUDGEMENT

There may be occasions and circumstances in which adults will need to make decisions in the best interests of the young person, where no guidance exists. Individuals are expected to make judgements about presenting behaviour to secure the best interests and welfare of the young people. Such judgements should always be recorded. Colleagues must always consider whether their actions are warranted, proportionate, safe, and applied equitably.

## SECTION THIRTY-ONE: PUBLIC CONFIDENCE & PROFESSIONAL STANDARDS

Colleagues have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of the young people. It is expected that colleagues will adopt high standards of personal conduct to maintain the confidence and respect of the children, young people, their colleagues, or the public in general and all those with whom they work.

There may be times, for example, when a colleague's behaviour or actions in their personal life come under scrutiny from local communities, the media, or public authorities. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. Therefore, colleagues should understand and be aware that safe practice also involves using judgement and integrity about behaviours in places other than the work setting. Ultimately, unacceptable behaviour away from the workplace may compromise their position in their workplace or indicate an unsuitability to work with vulnerable young people.

The behaviour of a colleague's partner or other family members may raise similar concerns and require careful consideration as to whether there may be a potential risk to young people.

### PROCEDURES

The following conditions must be adopted by all colleagues.

Colleagues must:

- Be aware that behaviour in their personal lives may impact upon their work with young people.
- Understand that the behaviour and actions of their partner (or other family members) may raise questions about their suitability to work with young people.
- Comply with company policy, specifically duties and responsibilities around behaviour and conduct.

Colleagues must not:

- Behave in a manner that would lead any reasonable person to question their suitability to work with young people or act as a role model.
- Make, or encourage others to make, unprofessional personal comments that scapegoat, demean or humiliate, or which might be interpreted as such.
- Talk directly to the press/media about provisions and services provided by PCM without clear permission from a director. Please note, if there are any concerns relating to the welfare of any individual accessing PCM provisions and services they must refer to our whistleblowing policy and/or our allegations policy.

## SECTION THIRTY-TWO: RADICALISATION & EXTREMISM

**Protecting young people from the risk of radicalisation and extremist ideology should be part of our wider safeguarding duties. During the process of radicalisation, it is possible to intervene to prevent vulnerable young people being radicalised.**

**Colleagues should use professional judgement, supported by training and guidance, in identifying young people who might be at risk of radicalisation and act proportionately. A Channel referral may be required.**

### PROCEDURES

**All colleagues will contribute towards:**

- **Assessing the risk of young people being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting vulnerable young people in the area and a good understanding of how to identify individuals who may be at risk of radicalisation and what to do to support them.**
- **A service that aims to ensure young people are safe from terrorist and extremist material.**

### RADICALISATION & EXTREMISM: PREVENTING RADICALISATION & CHANNEL

**Channel is a programme that focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Channel provides a mechanism for agencies to make referrals if they are concerned that an individual might be vulnerable to radicalisation.**

**All colleagues must:**

- **Report any concerns around radicalisation or extremism to the DSL immediately.**
- **Record all information and action taken using CHARMS.**
- **Understand when it is appropriate to make a referral to the Channel programme and alert the DSL to their concerns, without delay.**
- **Work with other agencies as appropriate.**

### PLEASE NOTE:

**The Government's Prevent work is intended to deal with all kinds of terrorist threats to the UK. The most significant of these threats is currently from terrorist organisations in Syria and Iraq, and Al Qa'ida associated groups. However, terrorists associated with the extreme right also pose a continued threat to safety and security. For further information, please refer to our Countering Radicalisation Policy.**

## SECTION THIRTY-THREE: SAFE RECRUITMENT

Our recruitment and selection procedures are in place to help deter, reject, or identify people who might abuse young people or who are otherwise unsuited to work with them. A relevant member of the Senior Management Team (SMT) will lead the process of making new employment appointments and delegate duties and responsibilities as appropriate, in consultation with the Managing Director.

PCM are committed to safeguarding and promoting the welfare of young people and colleagues are expected to share this commitment.

## SECTION THIRTY-FOUR: SELF-HARM

Self-harm is when somebody intentionally damages or injures their body. It's usually a way of coping with or expressing overwhelming emotional distress. Research indicates that up to one in ten young people in the UK engage in self-harming behaviours, and that this figure is higher amongst specific populations, including those with special educational needs.

Colleagues should remain alert to the following risk factors:

| INDIVIDUAL FACTORS | (PERVASIVE) FAMILY FACTORS | SOCIAL FACTORS |
|---|---|---|
| • Depression/anxiety<br>• Poor communication skills<br>• Poor problem-solving skills<br>• Hopelessness and low self-esteem<br>• Impulsivity<br>• Drug or alcohol abuse | • Unreasonable expectations<br>• Neglect or physical, sexual, or emotional abuse<br>• Poor parental relationships and arguments<br>• Depression, self-harm, or suicide in the family | • Difficulty in making relationships/loneliness<br>• Being bullied or rejected by peers. |

### RISK INDICATORS

- Changes in eating / sleeping habits (e.g., appearing overly tired if not sleeping well).
- Increased isolation from friends or family, becoming socially withdrawn.
- Changes in activity and mood (e.g., more aggressive, or introverted), as well as clothing/appearance.
- Lowering of academic achievement.
- Talking or joking about self-harm or suicide.
- Abusing drugs or alcohol.
- Expressing feelings of failure, uselessness, or loss of hope.

## PROCEDURES

**Any colleague who is aware of a young person engaging in or suspected to be at risk of engaging in self-harm must consult the DSL. Colleagues must:**

- **Actively seek to ensure that all relevant safety planning and risk assessments are revised/reviewed, referencing response guidance and supportive measures, as well as individual approaches to helping the young person to stay safe. Colleagues must be familiar with each young person's relevant safety planning and risk assessments.**
- **Must record and share appropriate information relating to any potential or suspected self-harming incidents.**
- **In a medical emergency, call 999 (or 112).**

**PLEASE NOTE: First Aid should be administered in accordance with company policy (Please refer to our Health and Safety Policy). In all cases, colleagues must refer to our Understanding and Managing Self-Harming Behaviours Policy**

# SECTION THIRTY-FIVE: SEXUAL VIOLENCE & SEXUAL HARRASSMENT

**Sexual violence and sexual harassment can happen to anyone, and it is not limited to adults. It can occur between two children or young people of any age and sex. It can also occur through a group of young people sexually assaulting or sexually harassing a single young person or group of young people.**

**Sexual violence and sexual harassment are never acceptable. Sexual violence and sexual harassment may overlap and can occur online and offline (both physical and verbal). It is important that all victims are taken seriously and offered appropriate support.**

**Colleagues should be aware that some groups are potentially more at risk. Evidence shows girls, young people with SEND and LGBT young people are at greater risk.**

# WHAT IS SEXUAL VIOLENCE & SEXUAL HARRASSMENT?

## SEXUAL VIOLENCE

**It is important that staff are aware of sexual violence and the fact young people can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below (See Over):**

- **RAPE:**
  A person (A) commits an offence of rape if: they intentionally penetrate the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **ASSAULT BY PENETRATION:**
  A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **SEXUAL ASSAULT:**
  A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

### WHAT IS CONSENT

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one type of sexual activity, but not another (e.g., to vaginal but not anal sex or penetration with conditions, such as wearing a condom). Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

## SEXUAL HARASSMENT

Sexual harassment is clarified as 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to:

- Violate a young person's dignity.
- Make them feel intimidated, degraded, or humiliated.
- Anxious, frightened and withdrawn.
- Create a hostile, offensive, or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- Sexual "jokes" or taunting, such as jokes about clothes and appearance, and calling someone sexualised names.

(Continued Over)

- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (colleagues should consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos, or drawings of a sexual nature.
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

    i. Non-consensual sharing of sexual images and videos
    ii. Sexualised online bullying
    iii. Unwanted sexual comments and messages, including, on social media
    iv. Sexual exploitation; coercion and threats

Sexual violence and sexual harassment are forms of abuse. Colleagues should read the above in the context of other safeguarding issues covered by this policy, such as:

- Bullying (including Cyber-bullying).
- Child Sexual Exploitation.
- Internet Use (Unacceptable Internet Use).
- Peer-on-Peer Abuse.
- Self-harm.
- Sexting.
- Violence Against Women and Girls.

The above list is not exhaustive.

In all cases colleagues must refer any suspicions or concerns to the DSL immediately. If it is suspected that a crime has been committed, the Police must be called without delay.

## PROCEDURES

When managing allegations of violence and sexual harassment, the initial response to a disclosure is crucial.

Young people must be 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.

If a young person is suspected of being a victim of sexual violence or harassment, colleagues must:

- Refer any concerns or disclosures to the registered service manager (DSL), without delay.
- Ensure that information relating to CSE, inappropriate internet use vulnerabilities, peer on peer abuse, sexting and other related concerns are identified in individual safety planning. This must be reviewed every month for accuracy, and relevance.
- Complete a record using CHARMS, including action taken.
- Contact the Police and MASH in accordance with raising a safeguarding concern.

Please Note:

- If colleagues have any concerns about violence and sexual harassment in the workplace, they should refer to our Disciplinary, Professional Conduct, Grievance and Appeals Policy.
- Colleagues should be aware that no form of sexual violence and/or sexual harassment will not be tolerated.

## SECTION THIRTY-SIX: SUICIDE PREVENTION

Many care leavers have experienced neglect, abuse, and rejection. This can result in significant emotional deregulation, substance misuse and other mental health related difficulties and concerns. Significantly, Unaccompanied Asylum-Seeking Children (UASC) may have experienced significant and profound trauma arising from exposure to horrific situations and events. This can lead to a range of difficulties such as Post-Traumatic Stress Disorder (PTSD), for example.

Everybody can feel sad, lonely, or depressed at times - especially teenagers - and they might find it hard to cope with these feelings. They may feel intense pain and upset which won't go away. Intense feelings of hopelessness for the future and prolonged low mood can lead to thoughts of suicide. People who attempt suicide feel they have no other option open to them at that time.

Suicide is a major factor in deaths of young people under 35 in the UK. In 2014, 597 young people between the ages of 10 and 24 took their own lives. Under the age of 35, the number rose to 1,556. Every year many thousands more attempt or contemplate suicide, harm themselves or suffer alone, afraid to speak openly about how they are feeling (Papyrus, 2016).

Most people who attempt suicide do not attempt again. However, about 16% repeat within one year and 21% repeat within 1-4 years, (Owens et al., 2005). Most repeat attempters will use more lethal means on subsequent attempts – increasing the likelihood of death. Approximately 2% of attempters die by suicide within 1 year of their first attempt. The history of a prior suicide attempt is the best-known predictor for future suicidal behaviours. Approximately 8-10% of attempters will eventually die by suicide.

## SELF-HARM – SUICIDE CONTINUUM

We distinguish between self-harm behaviours where suicidal thoughts may not be present, and suicidal behaviours. Therefore, a separate Understanding & Managing Self-harm Behaviour Policy is in place which aims to minimise the harm caused by self- injury. For clarification, this Suicide Prevention Policy aims to prevent suicide and manage the risks associated with suicidal thoughts.

## SUICIDE: WHAT ARE THE RISK FACTORS? AND WHAT CAN INCREASE RISK?

Important: If you have any concerns arising from the following risk factors, it is imperative that you consult with the registered manager and the Designated Safeguarding Lead (DSL) without delay. Please note that the manager is the DSL. If out-of-hours, you must use the management on-call system if you consider that there is a genuine and likely threat to the safety and welfare of the child concerned.

- Lack of friends and social isolation.
- Family problems.
- Sexual, physical, or emotional abuse.
- Severe mental health problems.
    I. Shield of shame.
    II. Lack of understanding of own history/trauma.
    III. Lack of trust in adults to keep them safe.
    IV. Feeling worthless.
- Poorly planned placement transitions.
- Alcohol and drug problems.
- Poor physical health.
- Recent change in role/ loss of role in life.
- Recent loss/bereavement or anniversary of loss/bereavement.
- History of suicide attempts.
- Family history of suicide attempts.

### WARNING SIGNS

Although most people will give off warning signs or invite invitations for help, some will not. Also, colleagues may not be around the young person for long enough periods of time to assess any changes in behavior. Asking the young person how they are feeling may help them talk about their feelings. Colleagues who suspect that a young person may be having thoughts of suicide should ask them, but it is crucial that this is handled sensitively with an understanding that some young people may be more willing to share such information with those whom a positive, trusting relationship is established.

## PROCEDURES

**PCM will:**

- Promote a culture which is tolerant of emotional distress and promotes understanding.
- Ensure any other relevant training is provided to meet the individual needs of young people.
- Work in partnership with other relevant agencies.
- Support colleagues to manage any suicidal thoughts, intentions, and behaviours of young people effectively and safely.
- Consider factors associated with suicide upon admission.
- Ensure all colleagues are trained in First Aid as soon as possible.
- Provide appropriate training in relation to self-harm, crisis management, and suicide prevention.
- Professionals meeting with the commissioning authority to ensure the continued suitability of a supported accommodation placement, where there are concerns that the young person's mental ill health or mental illness cannot be managed safety in supported accommodation.

**Young people will be encouraged to:**

- Talk to an adult (colleague) if they are in emotional distress. Please note that this could take some time as young people will need to develop a crucial sense of trust in those who support them.
- Alert an adult (colleague) if they suspect a fellow young person of being suicidal.
- Be guided about issues of when confidentiality must be broken to safeguard another young person.

**The above should be discussed with young people placed where self-harm/suicide may be an issue.**

**Colleagues will:**

- Support young people to ask for help as soon as they are feeling stressed, considering harming themselves or having suicidal thoughts.
- Support young people to talk openly about their problems and feelings.
- To avoid shaming young people.
- To share relevant information with the team at the respective setting or service.
- Support and fully engage inter-agency working/practices.

**If colleagues are concerned about young people presenting with a risk of suicide, they must refer to our Suicide Prevention Policy for further information and guidance. In all cases, the DSL must be informed.**

## SECTION THIRTY-SEVEN: TRANSPORTING YOUNG PEOPLE

**The transporting of young people is only conducted in exceptional circumstances, as ordinarily young people are expected to make their own travel arrangements in supported accommodation. Arrangements must be made in respect of the individual needs of young people.**

## PROCEDURES

**When transporting young people, colleagues must:**

- **Ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/or ability to drive.**
- **Be aware that the safety and welfare of the young person is their responsibility.**
- **Record details of the journey in accordance with agreed procedures.**
- **Ensure that their behaviour is appropriate (all the time).**
- **Ensure that there are proper arrangements in place for vehicle, passenger, and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven (if in any doubt, you must check with a senior professional).**
- **Ensure that any impromptu or emergency arrangements of lifts are recorded on CHARMS.**

# SECTION THIRTY-EIGHT: VIOLENCE AGAINST WOMEN & GIRLS (VAWG)

**Against Women and Girls (VAWG) is a term that can be applied to numerous areas of concern, covering a multiplicity of issues relating to safeguarding children and young people. Some relate directly to Specific Safeguarding Issues (SSIs), such as CSE and FGM, whilst others are linked to abusive behaviours that encompass a range of concerns, such as harassment, emotional abuse, and relationship abuse.**

**The HM Government (HMG) Strategy, 'Ending Violence Against Women and Girls 2016 – 2020' is clear that VAWG is both a cause and consequence of gender inequality. This refers to the need to challenge the "deep- rooted social norms, attitudes and behaviours that discriminate against and limit women and girls across all communities."**

**Whilst there are some predictive factors that can be linked with a higher risk of becoming a victim or a perpetrator of VAWG, it occurs across all socio-economic boundaries and cultural spectrums. VAWG can involve/be linked to:**

- **Domestic abuse.**
- **Stalking and harassment.**
- **Rape and other sexual offences.**
- **Honour-Based Abuse (HBA).**
- **Child abuse.**
- **Human trafficking and modern slavery.**
- **Sex work.**
- **Pornography and obscenity.**

**The above list is not exhaustive.**

## PROCEDURES

**If a disclosure or VAWG concern is raised colleagues must treat this as a significant concern indicating possible abuse or harm. Colleagues must:**

- **Inform the DSL if they become concerned about a young person being exploited and/or abused through VAWG, including if a young person makes a disclosure/an allegation indicating that they are a victim of VAWG.**
- **Be proactive, non-judgmental, and consistently vigilant to the potential for VAWG to impact upon the lives of young people in our accommodation, in a variety of ways.**

**If a young person makes a disclosure or an allegation, colleagues must:**

- **Listen and take seriously what a young person says and never express disbelief.**
- **Do not make any suggestions about what has taken place, or how it came about, or question the young person except to clarify what they are saying.**
- **Allow the young person time to express themselves' and do not press for detail beyond what is necessary.**
- **Do not ask a young person to repeat what has been said to anyone else before referring.**
- **Be calm and reassuring.**
- **Do not make assumptions and judgements about what is being said.**
- **Do not promise to keep information secret. Make it clear you will have to refer the matter on and to whom.**
- **Tell the young person that there are people who can help.**
- **Do not contact parents directly if the disclosure is made about a family member, take advice from the young person's social worker.**
- **Record what has been said using the young person's exact words and what you said in response on CHARMS. Be factual and state opinion, sign, date report and send to social worker.**

**Although anybody can make a referral to the Multi-Agency Safeguarding Hub (MASH), we expect that colleagues will inform the DSL who will be able to lead the process, ensuring appropriate action is taken.**

## SECTION THIRTY-NINE: WHISTLEBLOWING

**Colleagues will, in properly carrying out their duties, have access to, or encounter information of a confidential nature. Except in the proper performance of duties, colleagues are forbidden from disclosing or making use of in any form whatsoever such confidential information. However, the law allows you to make a 'protected disclosure' of certain information. The disclosure must also be made in good faith and in the public interest.**

This part is about the absolute need to raise concerns, however seemingly minor, if there is reason to believe a colleague's conduct, or behaviour, could indicate suspicions of potential harm to a young person.

## ESSENTIAL RESPONSIBILITIES

Whistleblowing is intended to encourage and enable colleagues to raise serious concerns when they feel they haven't been listened to or they feel that PCM have not taken the concerns seriously. Therefore, colleagues become aware of information that is reasonably believed to show one or more of the following (below), you must SPEAK UP and use the disclosure procedure set out in our Allegations Policy:

- A criminal offence has been committed, is being committed or is likely to be committed.
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which the individual is subject.
- A miscarriage of justice has occurred, is occurring, or is likely to occur.
- The health or safety of any individual has been, is being, or is likely to be, endangered.
- The environment, has been, is being, or is likely to be, damaged.
- The information tending to show any of the above is being or is likely to be deliberately concealed.

Colleagues are often the first to realise that there may be something seriously wrong. We expect colleagues who have serious concerns about any aspect of PCM to come forward and voice those concerns. We are clear that colleagues can and should voice concerns without fear of victimisation, subsequent discrimination, or disadvantage.

This applies to all colleagues, and applies equally to those designated as casual, temporary, agency, authorised volunteers, or work experience, as well as those contractors working for the company or on company premises (for example: agency personnel, builders, drivers, etc.). It also covers suppliers and those providing services under a contract with PCM.

Colleagues will be:

- Encouraged to feel confident in raising serious concerns, and to question and act upon concerns about practice, particularly if it relates to a welfare or safeguarding concern.
- Provided with a response to any concerns, and the means to pursue them.
- Reassured that they will be protected from possible reprisals or victimisation if any disclosure was made in good faith and supported to feel safe.

Colleagues should raise concerns with the DSL. The DSL is the registered service manager.

**If the DSL is the subject of the concern, colleagues can contact Hayley Williams (NSL/Managing Director), or an independent professional at Tristone. They may contact either Dawn Lundergan (Tristone's Safeguarding Director) on 07961767979 or Daryl Holkham (Tristone's Director of Operational Corporate Governance) on 07969 973920.**

**Consideration must also be given to whether a safeguarding concern should be raised with MASH/EDT and/or the Police.**

**Where a colleague feels unable to raise an issue as described above or feels that their genuine concerns are not being addressed, whistleblowing channels may be open to them:**

- **General guidance can be found at: https://www.gov.uk/whistleblowing/what-is-awhistleblower**
- **The NSPCC whistleblowing helpline is available for colleagues who do not feel able to raise concerns regarding child protection failures internally.**

**Colleagues can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.**

**For further information, refer to our Whistleblowing Policy, and our Allegations Against Staff Policy.**

## APPENDIX ONE: ABUSE OR SAFEGUARDING ISSUES

| RECOMMENDED GUIDANCE OR ADVICE | SOURCE |
|---|---|
| **ABUSE** | |
| What to do if You're Worried a Child is Being Abused | DfE Advice (2015) |
| Domestic Violence and Abuse | Home Office (2018/23) |
| Faith-Based Abuse: National Action Plan | DfE Advice (2012) |
| Relationship Abuse: Disrespect Nobody | Home Office (website) |
| **BULLYING** | |
| Preventing & Tackling Bullying & Advice for Parents & Carers on Cyberbullying | DfE Advice (2017) |
| Approaches to Preventing & tackling Bullying | DfE (2018) |
| **MISSING CHILDREN** | |
| Children Missing Education | DfE (2016) |
| Children Missing from Home or Care | DfE (2014) |
| Children and Adults Missing Strategy | Home Office (2011) |
| **CHILDREN WITH FAMILY MEMBERS IN PRISON** | |
| Children of Offenders | NICCO (website) |
| **CHILD EXPLOITATION** | |
| County Lines | NCA |
| Child Sexual Exploitation (CSE): Guide for Practitioners | DfE (2018) |
| Trafficking: Safeguarding Children | Home Office |
| **DRUGS (SUBSTANCE MISUSE)** | |
| From Harm to Hope (10-year Drugs Plan) | Home Office (2017) |
| Information and Advice on Drugs | Frank (website) |
| Drug and Alcohol Platform for Sharing Information and Resources | Mentor UK (website) |
| Drugs Advice for Schools | DfE & ACPO (2012) |
| **HONOUR-BASED ABUSE** | |
| Female Genital Mutilation: Resource Pack | Home Office (2023) |
| Female Genital Mutilation: Multi-Agency Statutory Guidance | Home Office (2020) |
| Forced Marriage: Information and Practice Guidelines | Home Office (2023) |

| RECOMMENDED GUIDANCE OR ADVICE | SOURCE |
|---|---|
| **HEALTH & WELLBEING** | |
| Fabricated Illness: Safeguarding children | NHS |
| Resources on Health, Wellbeing and Resilience | PHE (website) |
| Mental Health and Behaviour | DfE |
| **HOMELESSNESS** | |
| Homelessness Guidance for Local Authorities | HCLG (2018) |
| **ONLINE** | |
| Sexting: Responding to Incidents | UKCCIS (2018) |
| Sharing Nudes & Semi-Nudes | (2024) |
| **PRIVATE FOSTERING** | |
| Private Fostering: Local Authorities | DfE (2005) |
| **RADICALISATION** | |
| Prevent Duty Guidance | Home Office (2023) |
| Prevent Duty | DfE (2024) |
| Educate Against Hate Website | DfE & Home Office |
| **VIOLENCE** | |
| Gangs and Youth Violence | Home Office (2015) |
| Ending Violence Against Women & Girls: 2016 – 2020 Strategy | Home Office (2021) |
| Violence Against Women & Girls: National Expectations Statement | Home Office (2016) |
| Serious Violence Strategy | Home Office (2018) |

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