



Safeguarding and Child Protection Policy

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You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the shared drive. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for complying with the policy requirements at all times.

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1. Safeguarding and Child Protection Policy Statement

WECIL is committed to safeguarding the welfare of children and young people. We recognise that all children without exception have the right to protection from abuse. of any protected characteristics under the Equality Act 2010’.

Evidence suggests that disabled children have at least a 50% increased chance of being abused and face a wide range of barriers to disclosure and reporting. It is also the case that abusive practice in relation to certain disabled children may develop due to a number of specific issues such as: assumptions and stereotypes made about disabled children, communication barriers, their dependence on others for physical care and their exposure to a wider range of adults in different roles than many other children (e.g. physios, taxi drivers).

WECIL offers a range of services to children and young people and recognises that these may have a very powerful and positive influence on them. It is our aim to aid the development of self-esteem and social awareness of children and young people and to provide opportunities for enjoyment with personal achievement. WECIL will promote the safeguarding of children in all our services and consult with children and young people in policy and service delivery so that they may help to shape our services.

WECIL believes that protecting children is everybody’s business. All staff have a duty to protect children they come into contact with from abuse and to abide by the Safeguarding and Child Protection policy. Staff should always be mindful of the safety and welfare of children, including unborn children, older children and children living away from home.

1.1 WECIL Safeguarding & Child Protection Policy

2.1 Rationale

The wide-ranging nature of WECIL's work gives many staff substantial access to children and young people. We believe that safeguarding children is everybody's business and it is a duty we take very seriously.

It is the case that abusive practice in relation to disabled children and young people may develop due to assumptions made about them. There may be particular issues in relation to disclosure for disabled children and young people, for example:

- more restricted opportunities for disclosure due to segregation and a lack of communication skills of professionals with whom disabled children and young people have contact;
- people being less likely to believe disabled children and young people due to their impairment;
- differing behaviour patterns, which could be an indicator of abuse, may be seen as relating to the child or young person's impairment or condition;
- the child or young person may be relying on the abuser for personal assistance or communication;
- child protection workers may not be able to communicate effectively with the child or young person when a disclosure has been made; and
- ChildLine or other third-party disclosure points may be inaccessible to disabled children and young people.

As a Registered Charity, WECIL follows the latest guidance from the Charity Commission (Safeguarding Children and Young People 2014). WECIL also follows the latest guidance put forward by;

- Keeping Bristol Safe Partnership
- South Gloucestershire Children's Partnership
- B&NES Local Safeguarding Children's Board
- North Somerset Safeguarding Children Board

This list is subject to updating, if and when, WECIL extends its provision of services to children and young people in other local authority areas.

We therefore recognise that we work with especially vulnerable groups and that we must always act in the best interests of children and young people, ensuring that we will take all reasonable steps to prevent harm to them. Having safeguards in place within an organisation not only protects and promotes the welfare of children but also it enhances the confidence of parents, staff, volunteers, trustees, members and the general public in WECIL.

This policy has been produced in order to inform everyone associated with WECIL of their obligations regarding the safeguarding of children, to assist them in meeting their responsibilities, and to inform them about where they can go for advice and support.

For ease of use in this policy, the term 'staff' will mainly be used to refer to: paid staff, volunteers working for WECIL, anyone undertaking work experience or a work placement with WECIL, and our Trustees.

2.2 Aims

WECIL aims to:

- ensure the safety and wellbeing of children and young people as our paramount concern;
- recognise our legal responsibilities to safeguard children and young people and ensure our practice is informed by the relevant up to date rights and legal framework and guidance;
- identify and respond to all children and young people in need of support and/or protection;
- ensure children and young people receive the right help at the right time to address risks and prevent issues escalating and therefore we aim to intervene at the earliest possible stage;

- recognise the exceptional vulnerability of disabled children and young people to abuse and other welfare concerns;
- support the culture within WECIL that safeguarding children and young people is everybody's business and promote the safeguarding of children in all our services affecting them;
- consult with children in policy and service delivery and review our work with them, so that they have an appropriate level of control and choice about how they use our services;
- acknowledge the 'child or young person's world', avoiding making assumptions about this, and ensuring a children and young people - centred approach;
- ensure that the children and young people that we come into contact with, regardless of age, disability, gender, ethnic background, religious belief/faith, sexual orientation or identity, have a right to equal protection from all types of harm or abuse;
- take any disclosure of abuse extremely seriously as children and young people rarely lie about abuse;
- proactively ensure that our processes work holistically to expose the full extent of any abuse, keeping in mind that it's possible that workers who are safeguarding children and young people may only have one small piece of the jigsaw;
- work in partnership with other agencies and share information appropriately; and
- work in partnership with parents and carers appropriately, knowing that this improves outcomes for children and young people.

2.3 Definitions

Safeguarding is a relatively new term which is broader than 'Child Protection'. It has been defined as: *'The action we take to promote the welfare of children and protect them from harm... everyone's responsibility...defined as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.'* Working Together to Safeguard

Children (2018). Effective safeguarding of children therefore includes prevention, early intervention and Child Protection.

Child Protection is a vital part of everyone's safeguarding responsibilities. This is defined as: *'Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.'* *Working Together to Safeguard Children (2018)*.

This document recognises all welfare concerns, including preventative safeguarding, Early Help and abuse.

Within legislation the term 'child' refers to anyone up to the age of 18 years and so Child Protection legislation only applies to them.

The best practice identified in this Policy will apply to any children and young people accessing WECIL's Young People's Services, but any risks or referrals identified for young people over 18 will need to be dealt with under the Safeguarding Adults Policy'.

2.4 Leadership

The Designated Safeguarding Lead for Children and Young People (DSL/CYP) is the Children and Young People's Manager (Matt Peall). The Designated Deputy (DSD/CYP) is the Children and Young People's Manager (Kate Walker). In the absence of the DSL/CYP and DSD/CYP, decisions will be made by the Chief Executive Officer (Dominic Ellison) or in his/her absence, the most senior member of staff on duty. The Designated Trustee for Safeguarding (DST) is Ruth Pickersgill.

All staff have a key role in recognising any welfare concern they have about the children they work with, including suspected abuse. Effective safeguarding means that all welfare concerns need to be taken seriously.

If staff have any concerns about a child's welfare, they should act on them immediately by recording and reporting to the DSLCYP.

2.5 Scope & Implementation

This policy is the responsibility of everyone who works at, manages, volunteers for or visits WECIL. The DSLCYP will bring this policy to the notice to everyone throughout their time at our organisation, in a way that is most accessible to them, so that they fulfil their duties to co-operate with this policy. We deliver services at various venues, and this policy will apply in all these contexts.

We will also ensure that the partner organisations we work with will have safeguarding procedures in place. We will ensure that children and young people, and parents and carers are informed of this policy on our website, and through leaflets and briefings and other means if appropriate.

All staff will receive this policy and a briefing on safeguarding during their induction within the first three months of their employment, along with Section 1 and Annexe A of 'Keeping Children Safe in Education', the Staff Handbook, and the Bullying and Harassment, Data Protection, Equalities, Health and Safety and Whistleblowing policies. All staff that come into contact with children and young people as part of their job shall be provided with up to date safeguarding training as well as updates as necessary (for example, via email, e-bulletins and staff meetings) to provide them with relevant skills and knowledge to safeguard children and young people effectively including:

- Safeguarding and Child Protection (which includes FGM and Prevent) policy and process;
- Diversity awareness;
- First Aid (where appropriate); and
- Procedures on working with children/young people.

All staff will receive regular supervision and appraisals to ensure they understand and are supported individually with their safeguarding responsibilities. A record of staff training is kept on each member of staff's

individual continuing professional development record and on the Single Central Record. WECIL will provide at least an annual update on safeguarding issues, which may include on-line training should significant changes to legislation or best practice be identified.

Any breach of policy or procedures is treated seriously and could result in disciplinary action; this includes failure to report and maintain records as well as inappropriate conduct.

Trustees will also be invited to undertake safeguarding training and offered updates. Some members of staff and trustees involved in recruitment will receive Safer Recruitment training from an accredited trainer. Every recruitment panel will include at least one person who has received Safer Recruitment training.

The DSLCYP and the Deputy DSLCYP will undertake advanced training for DSLs at least every 2 years.

2.6 Other Associated WECIL Policies

- Health and Safety;
- Whistleblowing;
- Bullying and Harassment;
- Staff Handbook;
- Communications and IT;
- Complaints Policy and Procedure;
- Safeguarding Adults; and
- Data Protection.
- Children and Young People Code of Conduct

2.7 Monitoring

WECIL recognises our responsibility for monitoring safeguarding and requires the DST, informed by the DSLCYP, to present an annual report on safeguarding to be submitted to Trustees. We will carry out safeguarding audits as deemed necessary. Safeguarding will also be a standing agenda item for the Trustees and for all staff supervision sessions.

2.8 Review

WECIL regularly reviews the Safeguarding and Child Protection Policy, practice and procedures in light of experience and changes to legislation and regulations. This policy and procedure will be reviewed at least every two years.

2.9 Law & Guidance

This policy has been written in regard to a range of UK legislation that aims to protect children/young people. The UN Convention on the Rights of the Child (1989) which says that every child has:

- The right to a childhood including protection from all forms of violence (Article 6, 19, 34, 36);
- The right to have their best interests at the heart of all we do (Article 3);
- The right to a full and decent life for disabled children and access to healthcare (Article 23, 24);
- The right to an adequate standard of living and support if needed (Article 26, 27);
- The right to be educated (Article 28, 29, 32);
- The right to play and meet with other children and young people (Article 15, 31);
- The right to privacy (Article 16);
- The right to be heard and have their views considered (Article 12, 13, 14); and
- The right to understand the Convention and their entitlements (Article 42).

In England, the safeguarding and child protection framework is established by the Children Act (1989), strengthened by the Children's Act (2004) and the Children and Families Act (2014) which states that the best interests of the child are paramount.

Working Together to Safeguard Children (2018) provides statutory guidance to those working with children and highlights two main principles when working with them:

- those working with children should always adopt a child-centred approach to safeguarding; and
- it is everybody's responsibility to keep children safe.

The Equality Act 2010 places a duty on WECIL and all its staff to be aware of the need to eliminate discrimination and promote equality of opportunity. This applies to identification of need and risk as well as assessment. No child or group of children should be treated less favourably in being able to access high quality services that meet their specific needs.

Keeping Children Safe in Education (2022) explains the statutory safeguarding responsibilities of those organisations who work with children.

This policy also links and follows procedures from:

- Keeping Bristol Safe Partnership
- South Gloucestershire Children's Partnership
- B&NES Local Safeguarding Children's Board
- North Somerset Safeguarding Children Board

3. Safeguarding & Child Protection Responsibilities

3.1 Designated Safeguarding Children & Young People Lead

All Trustees should ensure that their organisation designates an appropriate, experienced member of staff to take lead responsibility for safeguarding, the DSL. This person should have the status and authority within the organisation to carry out the duties of the post, including access to needed resources and, where appropriate, the ability to support and direct staff. Actions but not overall responsibility can be delegated to the deputies.

The Trustees of WECIL have designated two Safeguarding Leads – the Designated Safeguarding Lead for Children and Young People (DSL/CYP) and the Designated Safeguarding Lead for Adults (DSL/A).

The areas of responsibility for the DSL/CYP include:

- refer cases where a crime may have been committed to the Police;
- refer, and support staff to refer, cases of suspected abuse to First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire, and support staff who make referrals to these agencies;
- refer, and support staff to refer cases to the Channel programme where there is a radicalisation concern;
- coordinate eSafety for WECIL;
- manage Risk Assessments, including those undertaken for Outings, First Aid, Meeting Medical Needs, Fire, Lockdown and Radicalisation;
- liaise with staff on matters of safety and safeguarding, acting as a source of support, advice and expertise for all staff;
- undergo training to provide them with the knowledge and skills required to carry out the role, updated at least every two years
- ensure their knowledge and skills are refreshed (via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments) at regular intervals as required, and at least annually;
- understand the assessment process for providing early help and statutory intervention, including local criteria for action and referral arrangements;
- have a working knowledge of how each Local Authority in which WECIL deliver services to children and young People conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- be alert to the specific needs of children and young people in need, those with special educational needs and young carers;

- keep detailed, accurate, secure written records of safeguarding concerns and referrals and if appropriate, share any information with other settings;
- encourage a culture of listening to children and young people, and taking account of their wishes and feelings in any measures WECIL may put in place to protect them;
- ensure all related safeguarding child and young people protection policies are known, understood and used appropriately, and that the Safeguarding and Child Protection policy is reviewed every two years (as a minimum);
- ensure the Safeguarding and Child Protection policy is available publicly;
- link with the local safeguarding partners;
- always be available for staff to discuss any safeguarding concerns (in person, phone, Skype or other such media) and arrange adequate and appropriate cover arrangements for any out of hours activities;
- oversee the budgetary allocations for safeguarding;
- undertake any safeguarding audits as necessary, including audits of the Single Central Record; and
- ensure that these duties can be carried out by the Deputy DSLs in their absence.

3.2 Chief Executive Officer

The CEO responsibilities include:

- Taking responsibility for the implementation of this Policy, and co-ordinating the Child Protection and Adult at Risk procedures, including implementation, regular review and updating, working with the Designated Leads as necessary;
- Keeping up to date with developments in safeguarding children and young people and adults at risk, and attending training as required;
- Ensuring that all staff, trustees and volunteers in WECIL receive regular training and briefings, and are kept up to date with

safeguarding issues within WECIL, but also locally and nationally, and keeping records of this training;

- Manage initial allegations and complaints about staff and liaise with the local authority designated as necessary; and
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
- Ensuring that all staff are aware of their legal duty to report safeguarding concerns to Children's or Adults' Social Care or the Police;
- In relation to allegations against staff, liaising with the Local Authority Designated Officer (LADO), and other external agencies as and when appropriate, including the Police and the Disclosure and Barring Service;
- Reviewing safeguarding in WECIL on an annual basis and producing an annual report to Trustees highlighting any trends, serious cases and recommending changes to policies and practice;
- Linking with the relevant Safeguarding Board to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- Ensuring that all key stakeholders (people who use services, staff, volunteers, visitors, partner agencies) are aware of this Policy and relevant procedures, and that they are available on WECIL's website and in accessible formats as appropriate;
- Safer recruitment of staff including risk assessments of any staff or volunteers who are not re DBS checked.

3.3 Trustees

The WECIL Board of Trustees has overall responsibility for ensuring that there are sufficient measures in place to safeguard the children within WECIL and having regard to their statutory duties. Trustees should:

- take reasonable steps to protect those connected with WECIL from harm;
- ensure that there is a range of measures in place at WECIL to protect children and young people from abuse and maltreatment of any kind;
- be alert to the possibility that people may use WECIL to deliberately gain access children and young people to abuse them;
- be aware that they will be held responsible for any possible breaches of trust or duties;
- responsibly handle all incidents or allegations of abuse and reports of safeguarding risks or procedural failures;
- ensure there are effective and up to date systems in place to safeguard and promote children and young people's welfare;
- make sure that people working in the charity know how to deal with safeguarding issues;
- set an organisational culture that prioritises safeguarding, so that it's safe for those affected to report incidents and concerns with the assurance that these will be handled properly;
- manage reports of incidents, allegations and risks, and record and store these securely;
- identify and manage risk;
- make reports where necessary to the police, Local Authorities and other agencies, and where the criteria are met, send a serious incident report to the Charity Commission;
- make changes to reduce the risk of any further incidents;
- not lead potential witnesses or contaminate evidence;
- agree the safeguarding policy, make sure it is updated, in line with statutory national guidance and local practice and that it available on the website to parents (knowing that WECIL works with vulnerable children and young people and the risk of harm is higher);
- prevent the charity from being abused for extremist purposes, including ensuring there are appropriate risk assessments in place;
- appoint a Lead Trustee for Safeguarding (DST);
- discuss and appraise the annual safeguarding report for Trustees; and
- be DBS certificated every 3 years.

3.4 Chair of Trustees

The Chair of Trustees has the responsibility of contacting the Local Authority Designated Officer (LADO) directly if there is an allegation of abuse made against the DSLCYP or DSLA.

3.5 Lead Trustee for Safeguarding

The Lead Trustee for Safeguarding has the responsibility for

- Ensuring that WECIL has up to date policies and procedures and a staff code of conduct in place for protecting adults and children at risk that are reviewed annually;
- Ensuring that WECIL has safer recruitment policies and that these are implemented in all recruitment activity;
- Ensuring WECIL has Designated Safeguarding Leads in place, and that they have had the required training that is appropriate for their role;
- Identifying possible risks to people who use services or anyone else connected with WECIL, taking into account local and national intelligence;
- Continually reviewing the safeguarding culture in WECIL;
- Ensuring that everyone involved in WECIL (staff and volunteers) knows how to recognise and report a safeguarding concern and has safeguarding training relevant to their role at least annually;
- Continually reviewing and evaluating any safeguarding training to ensure it is current and relevant;
- Ensuring that there is a process in place to ensure that all posts that need to be DBS checked are dealt with appropriately and that a risk

assessment process is in place for staff who do not require a DBS check;

- Ensuring that, as a Board, all trustees are aware of WECIL policies and procedures and receive at least annual briefings on safeguarding;
- Receiving an annual safeguarding report;
- Being aware of Serious Case reviews or other major incidents and ensuring that reviews are taken place to address any issues raised by Safeguarding Boards.
- Ensuring that relevant incidents are reported to the Charity Commission.

3.6 All Staff

All staff at WECIL, regardless of their seniority or role, have a responsibility to safeguard the welfare of children and young people. All staff should:

- be aware of and understand this policy;
- receive appropriate safeguarding and child protection training which is regularly updated;
- receive and read safeguarding and child protection updates;
- promote Fundamental British Values, challenge extremism, and identify children, young people and families who may be vulnerable to radicalisation;
- be prepared to identify children and young people who may benefit from early help and understand their role in the Early Help process;
- be aware of indicators of abuse and neglect so that they are able to identify cases of children and young people who may be in need of help or protection;
- know what to do if a child or young person tells them he/she is being abused or neglected and how to manage the requirement to maintain an appropriate level of confidentiality;
- be aware of the process for making referrals to First Response in Bristol, Children and Families Duty and Assessment Team in B&NES,

North Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire and Channel;

- ensure that if, at any point, there is a risk of immediate serious harm to a child or young person that they make a referral to the emergency services immediately;
- be able to record their safeguarding concerns clearly and appropriately;
- not assume a colleague or another professional will take action and share information that might be critical in keeping children and young people safe;
- be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision and share information while maintaining an appropriate level of confidentiality;
- raise concerns about poor or unsafe practice and potential failures in the safeguarding regime using appropriate allegation and Whistleblowing procedures;
- maintain an attitude of 'it could happen here' where safeguarding is concerned;
- act in the best interests of children and young people; and
- always speak to the DSLCYP if they are unsure.

4 Safeguarding Code of Conduct for Staff

4.1 Introduction

WECIL recognises that the vast majority of adults who work with children and young people act professionally and aim to provide a safe and supportive environment for children and young people in their care. However, as a result of their knowledge, position and the authority invested in their role, the adult always has a position of power over the child or young person.

All adults working with children and young people are in a position of trust and it is therefore vital for them to understand this; the relationship cannot be one between equals and there is great potential for exploitation and

harm. Session leaders in particular can acquire a 'guru-like' status with children and young people and exercise an unnatural and unhealthy influence. Adults have a responsibility to ensure that this unequal balance of power is not used for personal advantage or gratification.

A Safeguarding Code of Conduct ensures that children and young people are safeguarded in our setting and that staff are protected against allegations of abuse. Below are the behaviours and rules WECIL expects all its staff to follow when coming into contact with children and young people in any capacity on behalf of WECIL:

1. The safety and welfare of the child or young person is paramount and must be prioritised at all times.
2. Only staff with valid enhanced DBS checks can have sole responsibility for or be left alone with a child or young person.
3. Listen to and respect children and young people at all times; don't patronise them.
4. Never give out your personal contact details and don't link up with children and young people you work with on social networking sites.
5. Avoid favouritism and treat all children and young people fairly without prejudice or discrimination.
6. Always act within professional boundaries.
7. If you feel anyone is behaving inappropriately around children and young people, it is your duty to report your concern to the CEO immediately.

The Code makes clear the behaviour that is expected when coming into contact with children and young people, and therefore makes any conduct not in accordance with the Code easily identifiable. It is not meant to inhibit natural interactions with children and young people but to support respectful relationships between WECIL staff and the children and young people they come into contact with.

WECIL aims to give a clear message to staff that unacceptable behaviour will not be tolerated and that, where appropriate, legal or disciplinary action

is likely to follow. Accordingly, this document may be referred to in disciplinary proceedings. Much of the ideas and principles in this document are taken from the non-statutory document: 'Guidance for safer working practice for those working with children and young people in education settings' (2019), which is endorsed and recommended by the Safer Recruitment Consortium.

All those working with children and young people at WECIL should:

- follow WECIL's policies at all times;
- be responsible for their own actions and behaviour;
- avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- work, and be seen to work, in an open and transparent way;
- discuss and/or take advice promptly from the DSLCYP about any incident which may give rise to concern;
- contribute positively to our ongoing culture of vigilance, challenging unacceptable behaviour, and promptly reporting all allegations/suspicions of abuse in other staff; and
- continually monitor and review their practice.

WECIL understands that any Safeguarding Code of Conduct cannot cover all situations that may arise and that sometimes staff may feel that they must make decisions which directly contravene this guidance in the best interests of the children and young people in their charge. Individuals are therefore expected to make professional judgements when necessary which are warranted, proportionate, safe and applied equitably. Staff should always record and report these matters with the DSLCYP.

The WECIL Management Team is responsible for producing Risk Assessments for all the work delivered by staff. If staff have a concern about a particular area of work, for example certain event, they should contact the WECIL office and if necessary, a member of the management team will complete a Risk Assessment, which will be retained securely on WECIL's secure intranet.

4.2 Admissions and Exclusions

WECIL acknowledges that there are occasions when behaviour can prevent learning and cause problems. The impact of such behaviour will vary depending on the service being accessed. Staff should ensure that children and young people are being referred to the correct service for their level of need. Staff should seek to ensure that in regard to admissions and exclusions, our decisions are: transparent, justifiable, fair and communicated promptly and efficiently by appropriate representatives. We aim to provide prospective service users with good factual information about our programmes and regularly check all prospectus and website materials to ensure they are accurate and up to date. When there is a serious behaviour problem, a child or young person may be excluded from our activities.

In cases where there is a dispute between two children or young people, we reserve the right to take whatever actions we deem necessary to protect the interests of children and young people and this may include excluding them in accordance with the Behavioural Management Policy.

For children and young people accessing WECIL's complex needs service, it is expected that we will see a higher level of behaviour that can prevent learning and cause problems, we offer higher staffing ratios, and staff working within this service are trained to ensure we can redirect behaviours and minimise the risk to staff and other children and young people. This service has a high tolerance of such behaviours and children are assessed for level of need prior to attending the group. The children and young people will be reviewed regularly in line with the behaviour management policy and we will have a strategic plan in place to support escalating behaviour before we need to consider exclusion from the service.

Parents and carers are expected to disclose all medical information. All disclosures are confidential and used only to assess the best possible scenario for the child or young person. Withholding information may result in a child or young person losing their place within an activity through permanent exclusion. WECIL reserves the right to exclude families from its services if relevant medical information is deliberately withheld. *This information is kept on an internal digital record which is encrypted and password protected in order to provide the best support for the young person.*

WECIL complex needs service understands that children and young people with complex needs can have a long assessment frame to diagnose conditions, parents and carers are expected to keep the service updated with any changes or developments with the child or young person's diagnosis and provide relevant information e.g if a child or young person develops epilepsy, parents/carers would need to inform us of how the seizures are presenting and what advice they have been given. This will help to ensure that the child or young person is receiving the best support possible whilst attending our service.

4.3 Behaviour Management

WECIL will always take a trauma informed approach to behaviour management, recognising any Adverse Childhood Experiences, and understands that behaviours perceived as negative may have a context that needs to be considered, and may be attempts at communicating unmet needs. Therefore, any exclusion from services will only be used if there are no alternatives and the child or young person is putting themselves or others at risk.

The behaviour management of children and young people depends largely on context and broadly speaking, if children or young people display

difficult or challenging behaviour, staff should use strategies appropriate to the circumstance and situation. Where a child or young person has specific needs in respect of particularly challenging behaviour, a positive handling plan, including assessment of risk, should be drawn up by a DSLCYP and agreed by all parties, including clinicians and parents.

Children and young people who have specific needs in respect of difficult or challenging behaviour, will have 3 monthly reviews within the service. The aim of these reviews is to ensure that all parties are happy that the child or young person's needs are being met. During these reviews changes will be made to staffing ratios, positive handling plans and risk assessments where needed and agreed by all parties. WECIL reserve the right to move the date of the review forward if a child or young person is having a particularly difficult time. All options will be explored before a decision is made to remove the child or young person from the service.

4.4 Communication, including online safety

Staff should aim to not give their personal contact details to children and young people, for example, e-mail address, home or mobile telephone numbers, details of web-based identities.

All communications within WECIL with children and young people and families should be transparent and open to scrutiny. Staff should not request or respond to any personal information other than which may be necessary in their professional role. They should avoid in particular any communication with children and young people which could be interpreted as 'grooming behavior'.

Contact with children and young people using IT should be mediated through or include parents and WECIL, unless there are particular circumstances that necessitate direct contact and are therefore risk assessed accordingly (e.g. use of mobile phones during outings). Essential

communication with children and young people must be agreed in advance with management and parents. If children and young people attempt to contact or correspond with staff directly or indirectly for personal reasons using social media or any other technology, staff should not respond and must report the matter to the DSLCYP.

WECIL staff are only permitted access to parts of the computer system. Staff should not use WECIL computers for personal use. Staff should not forward any work, files, information etc. stored on WECIL computers to their home computer, unless this has been agreed by the relevant manager as necessary. Caution should be taken if personal e-mail addresses are used on WECIL computers within settings. Illegal or inappropriate materials must not be uploaded, downloaded or accessed.

Staff may have access to confidential information about children and young people and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child or young person. Online records should only be shared with those who have a legitimate professional need to see them. Staff are expected to comply with laws on Data Protection and any breaches of this may result in disciplinary action. WECIL may at times have access to confidential and sensitive information and have a duty of confidentiality to our organisation and children and young people. Information a staff member receives in the course of their job must not be used for their own benefit or the benefit of others, and must not be disclosed to anyone outside WECIL, except in the public interest, which includes safeguarding. Children and young people's full name will not be used anywhere on WECIL literature.

Email and the internet are available for communicating WECIL business. Staff attention is drawn to the fact that external email is not secure and that this must be taken into account in choosing how personal and confidential information is communicated. Staff must ensure that they do not make inappropriate comments in any emails. It is recognised that from time to time, email may be used for personal reasons unrelated to business. Such

use should be brief, outside of working hours (except in a case of emergency) and must exclude activities prohibited by the WECIL.

WECIL will ensure that internet access used within our organisation by children and young people will have appropriate content filtering. The use of internet derived materials should comply with copyright law. Parents of children and young people will be informed that children and young people will be provided with supervised internet access when necessary. If staff or children and young people discover unsuitable sites, the URL (address), time and content shall be reported to the session leader who will then report to the DSLCYP.

Most mobile phones now have access to the internet and picture and video messaging and may present opportunities for unrestricted access to the internet and sharing of images. Other mobile devices with this facility include laptops, tablets, watches and gaming hardware. Personal mobile phones and other devices may be used in some situations, as long as it is for business and emergency purposes only and staff are not to be distracted from the care of children and young people. Staff are responsible for keeping their own mobile devices up to date through software, security and app updates. The device should be virus protected and should not be capable of passing on infections to the network. Staff are responsible for charging their devices and for protecting and looking after their devices and will be held responsible for the upkeep, content and security of their own devices, e.g. access to web pages. If this is deemed to be a safeguarding issue this will be dealt in accordance with our safeguarding policies.

Pictures, videos and sounds are easily transferred and pose a real safeguarding issue to children and young people. WECIL will ensure that the publishing of images, video and sound will be strictly monitored for the appropriate permissions. Staff are not to use any mobile phone cameras to photograph children, unless there is a specific purpose which may entail a risk assessment. Images taken of children should be downloaded onto WECIL computers only and not be downloaded onto any personal device. If photographs or videos are required, this must be arranged in agreement

with children and young people, parents and all partner organisations. Parents may withdraw permission at any time. Digital images will be stored in a separate password protected files, which is accessed by designated staff only. After a photograph is taken down it will either be securely archived or deleted if unnecessary.

WECIL is committed to ensuring that all its IT systems are as secure as possible. All reasonable precautions will be taken to prevent access to inappropriate material. However, due to the international scale and linked internet content, it is not possible to guarantee that unsuitable material will never appear on a WECIL computer. The organisation does not accept liability for the material accessed, or any consequences of Internet access. WECIL will audit IT use to establish if its strategies are adequate.

WECIL respects a staff member's private life. However, it must also ensure that confidentiality and its reputation are protected. Staff using social networking websites in their private life must refrain from promoting themselves as working for the organisation, in a way which has, or may have, the effect of bringing the WECIL into disrepute. They must not identify other staff or children and young people without their consent and must not make any defamatory remarks about WECIL, children and young people or staff, or conduct themselves in a way that is detrimental to the organisation. Staff must not disclose personal data or information about WECIL, children and young people and families or staff that could breach legislation (e.g. photographs, images). Staff should not engage in any activity or communication with children and young people and families in social media sites. They should be aware of possible wider implications when entering any personal details on any online sites.

The WECIL website is a valuable source of information for children and young people, but it must be managed to reduce any potential risks. The DSLCYP will take overall safeguarding editorial responsibility and ensure that website content is accurate and appropriate to children and young people. WECIL must ensure that staff and all personal information will not be published on the website, particularly names in association with

photographs. Photographs and videos that include children and young people will be selected carefully and will not enable individual children and young people to be clearly identified and consent from parents will be obtained before photographs are published on the WECIL website.

Video Conferencing apps such as Zoom are becoming increasingly more popular as a method of communication and support. WECIL staff should remain vigilant when using video conferencing tools. Staff should ensure that meetings used on this platform have safety features such as 'the waiting room' function turned on. Details of the meeting should be should not be shared publicly and only with parents, staff and children and young people who are attending. A WECIL staff member should always be allocated as the host to ensure any concerns or inappropriate behaviour can be managed effectively. Only WECIL accounts on video conferencing applications should be used. Children and Young people accessing Zoom from home should be supported to disguise the backgrounds to their pictures if there are safeguarding concerns.

For further information on keeping safe on video conferencing platforms WECIL staff can refer to the NSPCC Net Aware website:

<https://www.net-aware.org.uk/>

4.5 Conduct

All staff have a responsibility to maintain public confidence in their ability to safeguard children and young people. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting in relation to the protection of children and young people, loss of trust and confidence, or bringing WECIL into disrepute.

4.6 Environment

Environments for children and young people should always be planned in ways which minimise the risks to them e.g. physical layout and surroundings. Opportunities to casually observe staff and child/young person interaction should always be maintained. We will display our Safeguarding Statement and other posters that display our commitment to challenging and reporting abuse to all our venues wherever possible. We will display helpline numbers for Childline and First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire.

4.7 Gifts and Rewards

Staff need to be aware of the safeguarding implications of gift giving. Gifts can be a sign of infatuations, favouritism and grooming. There are occasions when children and young people or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you, and this is usually acceptable. It is, however, unacceptable for staff to receive gifts on a regular basis or of any significant value. If in doubt, the staff member should consult their manager.

Staff should never give gifts or reward to children and young people or their families. This could be interpreted as a gesture either to bribe or groom. Any reward given to a child or young person should be in accordance with agreed practice, recorded and not based on preferential treatment. Staff should exercise care when selecting children and young people for specific activities, jobs or privileges in order to avoid perceptions of injustice. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria and there should be a clear audit trail indicating how decisions were made.

4.8 Home Visits

Some staff may carry out work that requires home visits. This work should necessitate a full Risk Assessment carried out by the management team. The assessment should include an evaluation of any known factors regarding the children and young people, parents/carers and any others living in the household. Consideration should be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, existing child protection concerns, complaints or grievances. Specific thought should be given to visits outside of 'office hours' or in remote or secluded locations. In the unlikely event that little or no information is available, visits should not be made alone.

To ensure staff safety during home visits all staff must follow the lone working policy both during and outside of 'office hours'.

4.9 Infatuations

All staff need to recognise that it is not uncommon for children and young people to be strongly attracted to a member of staff and/or develop a 'crush' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to cultivate this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted. Any member of staff who believes that a child or young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the DSLCYP. In this way appropriate early intervention can be taken which can avoid hurt, embarrassment or distress for those concerned.

The DSLCYP should give careful thought to those circumstances where the staff member, child or young person and their parents should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child or young person and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

4.10 Intimate and Personal care

WECIL seeks to ensure that all of our activities are accessible. We aim to promote the health, safety, independence and welfare of children and young people and respect their dignity and privacy.

WECIL understand that many of the children and young people accessing our services will have varying needs.

Staff will at times be required to help with intimate and personal care this could include:

- Feeding
- Washing hands/face
- Dressing/undressing
- Toileting (including changing incontinence pads)
- Menstrual care
- Medication administration (such as midazolam)
- Catheter/ Stoma care

Although personal care may be required, staff should always be promoting children and young people to act as independently as possible, encouraging them to do as much for themselves as they are able to, and ensuring their dignity and privacy are maintained.

Staff should be made aware of the child or young person's needs on registration documents and this information should be included in the child or young person's individual care plans.

When physical assistance is required, this should normally be undertaken by the child or young person's support workers; however, all staff should be prepared to assist any child or young person in emergencies to ensure our support for each child or young person is holistic and that we are working effectively in partnership with other professionals. Staff should record when personal care has taken place and inform parents or carers.

If intimate or personal care is required for a child or young person who does not have this written into their care plan, a signed record should be kept along with details of what happened and this should be reported to the manager so that a care plan can be written for future sessions. This can then be reported to the DSLCYP if it is felt necessary.

Children and young people are entitled to respect and privacy at all times, however, there needs to be an appropriate level of supervision in order to safeguard children and young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the children and young people concerned and sensitive to the potential for embarrassment.

All intimate and personal care should be carried out in a professional manor and with the child or young person's dignity in mind.

4.11 Lost Children and Young People

Staff based in WECIL should be aware of the Lost Child procedures in which they are based. The procedures highlighting what to do in the event of any child or young person going missing is outlined in the Children and Young People's Departments staff handbook which all staff working with Children and Young People must read and understand.

4.12 One-to-One Situations

Working in one-to-one situations is sometimes unavoidable, therefore to safeguard both children and young people and all staff, a Risk Assessment in relation to the specific nature and implications of one-to-one work should always be undertaken by management. Each assessment should consider the individual needs of each child or young person and should be reviewed regularly.

It is not permitted to make arrangements to see children and young people away from the work premises. At times when there is a clear necessity this may be required, if this was the case approval would need to be obtained from the manager, the child or young person and parents or carers.

Further detail on how to manage one to one situations can be found in the Children and Young People's Departments Staff Handbook.

4.13 Partnership Working

WECIL must always ensure that our delivery partners have effective safeguarding policies in place and display good practice in regard to safeguarding, including having a named safeguarding lead and offering staff safeguarding training and support.

Charities must adhere to the Charity Commission Safeguarding Standards. Any concerns that staff have of poor safeguarding practice in partner organisations should be reported to the DSLCYP at the time they are noted. Partner organisations must inform WECIL of the occurrence of any breaches or suspected breaches of their safeguarding policy.

WECIL will offer safeguarding support and advice where appropriate to affiliates. Valid, enhanced DBS checks, including a check against the adults' barred list or the children's barred list, as appropriate, must be carried out by partner organisations in relation to anyone who is employed or volunteers by them.

Partner organisations should inform WECIL and the DBS about any person carrying out the activities where permission has been removed for people to carry out work with children because, in their opinion, such person has harmed or poses a risk of harm to the children and young people.

WECIL will ensure that each delivery partner participates in a bi-annual Safeguarding self-review and action plan, which follows the Safe Network

Standards - Safeguarding children and young people (0–18s) in the VCSE (Voluntary, community and social enterprise).

4.14 Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with children and young people, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the child or young person's individual needs. Motivation is absolutely crucial and the reason for contact must be absolutely clear. The contact should take place in a safe and open environment easily observed by others and should last for the minimum time necessary. The extent of the contact should be made clear and undertaken with the permission of the child or young person. Staff must tell the child or young person that they are about to make contact, and check that the child or young person is happy for this to happen. Contact should be relevant to their age and understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by the child or young person. Staff should therefore use their professional judgement at all times.

Parents and carers should be informed of the need for appropriate physical contact during activities and request for their consent should be sought in advance.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and circumstances should be immediately reported to the DSLCYP. Extra caution may be required where it is known that a child or young person has suffered previous abuse or neglect. Staff need to be aware that the child or young person may associate physical contact with such experiences. They also should recognise that these children may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively and help them to understand the importance of personal boundaries.

Disabled Children and Young People may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the child or young person's needs, consistently applied and open to scrutiny.

4.15 Physical Intervention

Physical intervention should never be used as a first reaction to difficult or challenging behaviour. Staff should make all efforts to diffuse or de-escalate the situation using strategies in the positive behaviour and physical intervention plans. If a member of staff feels that a child or young person is a danger to them or other children and young people, then all efforts should be made to create a safe environment for everybody involved, this could include evacuating the area to allow the child or young person space.

In situations where a child or young person is at risk of harming themselves, others or causing significant damage to property and all efforts to diffuse and de-escalate the situation have failed then trained staff can use physical intervention **as a last resort.**

Physical intervention should always be used in the least restrictive form for the minimum amount of time necessary, and should never be used as a physical punishment or to cause pain or harm to the child or young person.

The use of unwarranted or disproportionate physical force is likely to constitute a criminal offence.

Where WECIL judges that a child or young person's behaviour presents a serious risk to themselves. Others or property, a member of the management team must always put in place a robust Risk Assessment which is reviewed regularly and, where relevant, a physical intervention plan.

4.16 Private Accommodation

Staff should not invite any children and young people into their living accommodation unless the reason to do so has been firmly established and agreed with their manager and the child or young person's parents or carers. It is not appropriate for staff to be expected or requested to use their private living space for any activity, play or learning. This includes seeing children and young people for e.g. discussion of reports, academic reviews, tutorials, pastoral care or counselling. Managers should ensure that appropriate accommodation for such activities is found elsewhere in a setting. Under no circumstances should children and young people be asked to assist adults with jobs or tasks, either for or without reward, at or in their private accommodation.

4.17 Settings

WECIL session leaders work in a variety of different settings within the community. On visiting a setting, all staff should find out the safeguarding and behaviour policies (if relevant) and the fire evacuation and lockdown procedure of the setting.

All significant incidents that occur whilst during work by staff in settings must be recorded. This includes accidents resulting in any kind of medical attention, incidents (such as violent or threatening behaviour of children and young people), disclosures of any welfare issue, or near misses. Incidents that have occurred during tuition delivered within setting should be reported using the setting reporting procedure. Staff required to complete an Incident form at a setting must ask for a copy of the report, and any subsequent investigation documents. These should be sent to WECIL. This allows us to monitor issues that our staff are having, and helps to identify reoccurring problems.

Staff have a right to expect children and young people to behave in a reasonable and considerate manner (in line with the CYP code of conduct).

4.18 Sexual Activity

Sexual activity involves physical contact including penetrative and non-penetrative acts and also includes non-contact activities, such as causing children and young people to engage in or watch sexual activity or the production of pornographic material. Any sexual activity by a member of staff with or towards a child or young person is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a person under 18 years of age, even if it appears the child or young person is consenting and is over the age of 16.

4.19 Social Contact Outside of the Workplace

Staff should never deliberately seek out any social contact with children and young people outside of the workplace. They should actively discourage children and young people or parents and guardians who seek to establish social contact. Staff should be aware that professionals who sexually harm children and young people often seek to establish relationships and contact outside of the workplace with both the child/young person and their parents/carers, in order to 'groom' the family and/or create opportunities for sexual abuse. Other informal social contact can lead to child/young person sexual exploitation, radicalization and/or staff exerting inappropriate influence on children and young people and possibly bringing the setting into disrepute (e.g. attending a political protest, circulating propaganda).

Outside of sessions, it is likely that staff may meet children and young people and families coincidentally. In all cases, staff must ensure that they maintain professional boundaries at all times and be aware of their use of alcohol. Staff may also have genuine friendships and social contact with parents or carers of children and young people, independent of any professional relationships. Contact of this nature must necessitate that the member of staff should exercise their professional judgement.

Some staff may, as part of their professional role, be required to support a parent or carer. If that parent or carer comes to depend upon the staff

member or seeks support outside of their professional role this should be discussed with the DSLCYP and where necessary referrals made to the appropriate support agency.

4.20 Special Educational Needs (SEN) and Physical Impairments

WECIL is committed to providing children and young people with SEN and/or who have physical impairments – commonly referred to as ‘Children with Special Educational Needs and Disabilities’ (SEND) - with high quality support. We aim to include them, to value them, to support them, and to make any reasonable adjustments accordingly. We are committed to working closely with their parents/carers and with other specialist support services to provide the best possible care.

We will work to recognise any needs a child or young person may have and develop strong partnerships with professionals at other agencies to help make a thorough assessment of specific needs, and adapt services and/or provide additional services to provide a cohesive and integrated support package to be inclusive of those needs. WECIL aims to promote and value diversity and difference, and challenge inappropriate attitudes and practices. Children and young people will be encouraged to value and respect others who are disabled or have SEN.

WECIL recognises the importance of empowering children and young people to understand safeguarding issues and how to keep themselves safe in an accessible way. As they get older WECIL will support them to explore the barriers faced by disabled people and to support them to develop healthy adult relationships and self-care.

4.21 Transportation

Staff should never offer to transport children and young people outside of their normal working duties, other than in an emergency or where not doing so would mean the child or young person may be at risk. In these

circumstances the matter should be recorded and reported to the DSLCYP and the child or young person's parent or Carer.

In certain situations, staff may be required or offer to transport children and young people as part of their work. In such cases, staff have a duty to carry out a Risk Assessment to manage any known risks which should be signed off by a member of the management team.

It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats for younger children. Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.

4.22 Visitors, including parents and carers

Staff need to ask visitors to sign in/out and request identification with photographs. If visitors want take pictures of children and young people, the parents or carers and the DSLCYP must give their consent. Visitors and other professionals are not allowed to come into see services unsupervised. If parents and carers want to be invited into sessions, they must be formally invited to do so by the leader of the session.

Posters with information of how to report a concern and pictures of the DSLCYP and DSLA will be displayed in reception.

5 Safeguarding procedures

5.1 Recognising Signs

All staff have a key role in recognising any welfare concern they have about the children and young people they work with, including suspected abuse. The quality of relationships staff develop with children and young people is vital in helping to understand unexplained changes in behaviour and/or

personality. Small as well as more obvious unexplained changes may indicate a cause for concern. Effective safeguarding means that all welfare concerns need to be taken seriously. *If staff have any concerns about a child or young person's welfare, they should act on them immediately by recording and reporting to the DSLCYP.* Suspected abuse is extremely serious and should always be reported to the DSLCYP on the same day that it is noted. Abuse is defined as: *'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. They may be abused by an adult or adults or another child or children.'* *Working Together to Safeguard Children (2018)*

Staff are not responsible for diagnosing or investigating abuse. However, they do have a clear responsibility to be aware of that all is not well with a child or young person and to be able to recognise the signs of abuse (concerns arising from the appearance and the behaviour of the child or young person and/or the abuser). Not all concerns about children and young people relate to abuse; there may well be other explanations or other welfare concerns that do not meet Child Protection thresholds. It is important that staff keep an open mind and treat every concern with the utmost seriousness. They should never assume that someone else will take action.

Although some signs do not necessarily indicate that abuse is actually taking place, they may help adults recognise that something is wrong. The possibility of abuse should be reported if there are a number of these signs or any of them to a marked degree. There are 4 recognised broad categories of abuse:

- Physical Abuse
- Sexual Abuse
- Emotional Abuse
- Neglect

These and other complex types of abuse are defined and symptoms laid out in this document (Section 5). A child or young person may be subjected to

a combination of different kinds of abuse. It is also possible that they may show no outward signs and hide what is happening from everyone. Staff need to be sensitive in particular to signs of abuse in children and young people with limited or non-verbal communication as statistically these and other disabled children and young people are more likely to be abused. Staff should be aware that behavioural difficulties in disabled children and young people might not always be linked to their impairment, but to the possibility of abuse. Staff should also be made aware of any children and young people who have social workers, or other children and young people who are especially vulnerable (including children and young people in care, newly adopted children and young people, young carers and those with disabled parents) and be extra vigilant.

5.2 Disclosure

Staff necessarily work towards forming positive and trusting relationships with the children and young people in their care. At times this may mean that children and young people feel that they can confide in them about aspects of their life that may cause concern for their general welfare. All staff should be alert to possible disclosure. The disclosure may be that they are feeling unsafe or are being abused – or it may be that they feel vulnerable in other ways. Effective safeguarding means that any welfare concern needs to be taken seriously and all staff have a role to play in this. Any concern that staff are made aware of should be recorded and reported to the DSLCYP on the same day it is noted.

If the disclosure involves abuse, the matter is extremely serious. A disclosure may involve a criminal offence and if poorly handled could increase the risk for the child or young person and could undermine a potential prosecution. Staff must take the following action:

- Stay calm.
- Listen to what the child or young person is actually saying.
- Reassure them that they have done the right thing by telling.

- Know that children and young people rarely lie about abuse and indicate that they are taking the matter extremely seriously (without saying they believe them).
- Do not promise the child or young person that this can be kept secret, as subsequent disclosure could then lead to them feeling betrayed. Explain that they must tell other people to keep them safe. Absolute confidentiality should never be promised. Inform the child or young person who is using WECIL's service (or whoever has disclosed the information) that the information cannot be kept confidential and will have to be passed on to appropriate agencies.
- Do not interrogate the child or young person, or push for more information. Ensure that any questions asked are open, not leading closed questions. It is not the role of staff to investigate but to report concerns.
- Do not ask them to repeat what they have said to another member of staff.
- Make a note of any conversations with the child or young person, trying to make these as detailed as possible, including when and where the conversations took place.
- Report the disclosure to the DSLCYP. The person to whom the disclosure was made should ensure that the child or young person is informed about what will happen next, so they can be reassured about what to expect.

5.3 Recording

Effective record keeping is essential to help us identify needs at an early stage. Often it is only when a number of seemingly minor issues are taken as a whole that any general welfare or Child Protection concern becomes clear. Record keeping helps us monitor and manage our safeguarding practices and in any inspection it is vital evidence of robust and effective safeguarding practice.

Any member of staff who has any kind of concern relating to the abuse of children and young people must make an accurate record as soon as possible. Record keeping and reporting forms are found on SharePoint and must be used to record all incidents, concerns and referrals. Records are stored and kept in compliance with Data Protection legislation including GDPR. They are kept securely until the child or young person leaves the service or 6 years from the date of report.

All child welfare records should be:

- clear, straightforward and avoid jargon;
- concise;
- accurate;
- contemporaneous;
- contextualised;
- correctly dated;
- written as to differentiate between facts, opinion, judgments and hypothesis;
- signed with the name of the signatory clearly printed; and
- written with a mind that the subject of a record does have the right in law to request access to them at any stage.

The record should explain:

- what was seen in appearance and behaviour of the child: when and where (include if relevant a site map indicating the position of any bruises or marks, trying to indicate size, colour and shape);

- what was said by the child using the exact words used;
- a note of any other people involved e.g. as witnesses;
- what the staff member thought and why they thought it;
- what the staff member did; and
- any other relevant information.

If abuse is suspected, the staff member must record this on the same day that the concern is noted.

The DSLCYP is responsible for keeping all child welfare records secure at WECIL. These records should be kept separately from general information kept about the child or young person. All records about allegations about staff should be kept by the DSLCYP in a central and secure location and separate from personnel records.

Information should be shared with all those who need to have it, whether to enable them to take appropriate steps to safeguard the child or young person or to enable them to carry out their own duties, but it should not be shared wider than that. Parents and carers may have access to the records only by permission of the DSLCYP (who may decide that it is in the interests of the child or young person not to share them).

Details of allegations against staff that are found to have been malicious should be removed from personnel records. However, 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 taken and decisions reached, is kept on a person's confidential personnel file and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS disclosures reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation resurfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if

that is longer. The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which provides some practical advice on employment retention.

5.4 Reporting and Referring

Staff spotting the signs of abuse and/or receiving disclosure of abuse or any other welfare concern, must report their concerns to the DSLCYP. If the DSLCYP is not available, the member of staff must inform the Deputy DSL, Chief Executive Officer or another manager of the disclosure immediately. During evenings and weekends staff are to inform Social Services and advise the Manager or another Manager immediately on the next working day.

If in exceptional circumstances, the DSLCYP or deputies are not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the SLT and/or take advice from First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection, And Access and Response Teams (ART) in South Gloucestershire directly. In these circumstances, any action taken should be shared with the DSLCYP as soon as is practically possible. If the abuse implicates the DSLCYP, the concerns should be discussed with the DST or the Chair of Trustees. If staff are working within another organisation, they should also report to the DSL of that organisation. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

When reporting, staff should supply the DSLCYP with a verbal account of what happened which can allow the DSLCYP to ask specific questions as necessary. Staff should then record the incident using SharePoint. After reporting, possible options for action could then be:

- i. **Carry on recording incidents and take no further action at the present time.**

If it is decided that a referral should not be made at the current time, it may be important to monitor the child or young person's behaviour closely and carefully record any concerns. Concerns may also be discussed with other agencies as appropriate. The local Families in Focus team may be a useful source of support at this stage, and may be able to offer insight and advice.

ii. Discuss with parents or carers

Parents or carers could be contacted at the earliest opportunity to ascertain if there is a known reason for the concern (e.g. a change in family make-up, death of family member). The conversation can be carried out by the DSLCYP or the staff member, whichever is deemed most appropriate. Staff should remember that if abuse is taking place, it is often not the parents or carers but other family members or friends who are causing it and parents and carers are often the last to know.

We should aim to ask the parents or carers for an explanation in the majority of cases. We need take no further action in terms of referring unless the discussion throws up more concerns. The discussion will need to be recorded, including why we are not referring further if that is the case. If staff have concerns that either the child/young person or the parent/carer needs more support, but concerns do not reach Child Protection thresholds. They may make arrangements to provide the parent/carer with extra support and if necessary, early intervention can be sought directly through seeking help from external agencies or through First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection And Access and Response Teams (ART) in South Gloucestershire and the Families in Focus team. If, after discussion with the parents or carers, staff feel that the child or young person is in need of Child Protection services, they must be referred to First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North

Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire or the Police on the same day the concern was noted.

iii. Refer

Referral means sharing information about concerns with outside agencies. If staff are concerned about the safety of the child or young person, information must be passed on to the DSLCYP. It is important to remember that if WECIL refers, we are not reporting the parents/carers - we are referring to protect the welfare of the child or young person. A referral is normally carried out by a DSLCYP, but any member of staff can refer.

A child or young person can be referred to First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire, or the emergency services, or to other services in the following ways:

- Inform parents or carers that the child or young person will be referred to First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire (or Local Authority Social Care directly if they already have a social worker) IF IT IS BELIEVED THAT DOING SO PUTS THE CHILD OR YOUNG PERSON AT NO FURTHER RISK. This can be difficult, especially if staff have a close relationship with the parent or carer and they may feel unsure, uncertain about reporting the matter, nervous about how the parent/carer will react or worried whether what they have seen is really abuse or not. Nevertheless, staff should aim to tell the parents/carers anyway. It is important to make the parents/carers understand that there is a policy in place which must be followed. Staff should tell the parent/carer that our safeguarding policies are designed to provide protection for children and young people as well as help for parents and carers.

- Discuss with First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire (or Local Authority Social Care directly if they already have a social worker), without informing the parents/carers, IF IT IS BELIEVED THAT DISCUSSING WITH A PARENT/CARER WILL PUT A CHILD/YOUNG PERSON OR THEMSELVES AT FURTHER RISK. If parents/carers haven't been informed, First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire will want to know the reasons why.

Note: First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire can be contacted to discuss the family without giving contact details of the family. This is called an 'anonymized enquiry'. Staff will be required to identify themselves as professionals while making an anonymized enquiry. During the course of a call, they may be asked to supply identifying information of the family in order to keep a child or young person safe and they then may ask the staff member to inform the parent that they have been referred. An anonymized enquiry can also be made to the Local Families in Focus team, the NSPCC, or the Police on 101.

iv. Contact the Emergency Services

Staff and the DSLCYP may feel, after discussion, at this stage it is appropriate to contact the emergency services at once.

If the staff member and the DSLCYP disagree about whether to refer, the staff member can also FastTrack the referral without the agreement of the DSLCYP. The fast track procedure is **immediate** escalation to the relevant authority.

Whatever the course of action decided upon on after reporting a concern, the details of the meeting and any action agreed must be recorded.

For a Child Protection concern, First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire should respond within 4 hours and formally acknowledge the referral within 1 working day and let the referrer know what they have decided to do as a result. If no response has been received after 3 working days, the referral should be taken to a higher authority within First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire, and the worker told that this is the case. If the referral requires a response within 4 hours by First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection and Access and Response Teams (ART) in South Gloucestershire, it may be appropriate to contact the police directly in any case. Out of hours referrals should be made to the Emergency Duty Team. If, after a referral, the child or young person's situation does not appear to be improving, we should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child or young person's situation improves.

Note: there are specific referral pathways for adult victims of Domestic Violence and Abuse, Female Genital Mutilation, non-mobile babies and Radicalisation and these are described in this document under the relevant headings in this policy.

5.5 Emergencies

In some instances, staff may be the first people to recognise that the child or young person may need immediate attention resulting from abuse. The emergency procedure can also be applied if the member of staff feels that the young person is in immediate danger, or is not satisfied with the action taken by the Manager or the First Response in Bristol, Children and Families Duty and Assessment Team in B&NES, North Somerset Child Protection And Access and Response Teams (ART) in South

Gloucestershire or any other referral agencies to whom the report was made. The DSLCYP or member of staff concerned will ensure that the service user is informed about what will happen next so that they can be reassured about what to expect. Depending on the circumstances staff may need to:

- Telephone for an ambulance or the police (dial 999);
- Ask a doctor to call;
- Ask the parent or carer to take the child or young person to the doctor or the hospital at once;
- Offer to take the parent/carer and child/young person to the hospital/surgery/clinic for immediate medical attention as appropriate; and/or
- Take the child/young person to the hospital/surgery/clinic.

It is important to remember that the child or young person is the legal responsibility of parents/carers and that person (identified on child/young person's registration forms) must be involved in the matter as soon as practicable, and **IF IT IS BELIEVED THAT DOING SO PUTS THE CHILD OR YOUNG PERSON AT NO FURTHER RISK**. Having taken the necessary emergency action, any suspected abuse must be reported to the DSLCYP. A record of an account of the emergency must be written retrospectively when it is possible to do so.

5.6 Allegations

The following signs and symptoms may mean that staff are involved in abuse:

- Paying an excessive amount of attention to a child/young person or groups of children and young people;
- Providing presents, money or having favourites;
- Seeking out particularly vulnerable children and young people
- Trying to spend time alone with a particular child/young person or group of children and young people on a regular basis;

- Making inappropriate sexual comments;
- Sharing inappropriate images;
- Being vague about where they have worked or when they have been employed; and/or
- Encouraging secretiveness.

Concerns and allegations about staff should be directed to the DSLCYP on the same day that it is noted, or directly to the Local Authority Designated Officer (LADO). Concerns about the DSLCYP and/or DSLA should be directed to the CEO. Concerns about the DST should be directed to the Vice-Chair of Trustees, or if necessary, directly to the LADO. Staff should take steps to ensure that during the remainder of the working session that the person they have concerns about is not left in sole charge of any child or young person. Staff who have concerns or has been informed of inappropriate behaviour must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

Where there is a complaint or allegation against a member of staff there may be three types of investigation:

- a criminal investigation;
- a child protection investigation; and/or
- a disciplinary or misconduct investigation.

The results of the police and Child Protection investigation may well influence the disciplinary investigation, but not necessarily.

The DSLCYP must seek to clarify the nature of the concerns by asking the following of the parent/carer or reporting member of staff if the staff member has:

- behaved in a way that has harmed a child or young person, or may have harmed a child or young person;

- possibly committed a criminal offence against or related to a child or young person;
- behaved in an inappropriate way towards a child or young person which may have indicated the he or she is unsuitable to work with children and young people

If, following consideration, the allegation is clearly about poor practice, this will be dealt with as a misconduct issue. If it appears that there is a case of suspected abuse, the DSLCYP should contact the DST and the Local Authority Designated Officer (LADO) at the earliest opportunity. WECIL will ensure that Local Authority Social Care are given all the assistance they require in pursuing any investigation on these situations. The LADO should be given a signed and dated written record of the concerns. Staff should maintain confidentiality and guard against publicity while an allegation is being considered or investigated and follow local information sharing protocols. The DSLCYP should then follow the LADO's advice on how to deal with the allegation. Relevant evidence and information will be given to us if required by the LADO.

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. All allegations must be investigated as a priority so as to avoid any delay. It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months and all but the most exceptional cases should be completed within 12 months. For those cases where it is clear immediately that the allegation is unfounded or malicious then it is expected that they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence, appropriate action should be taken by WECIL within 3 working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

If the allegation is substantiated and the person is dismissed or we cease to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the LADO should discuss with us whether a

referral to the Disclosure and Barring Service (DBS) for consideration of inclusion on the barred lists is required. There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct (including inappropriate sexual conduct) that harmed (or is likely to harm) a child or young person or if a person otherwise poses a risk of harm to a child or young person.

At the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case to determine whether there are any improvements to be made to our procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

5.7 Support to Staff

As a result of reporting any concerns, staff members may feel angry and upset. The DSLCYP will provide support to the member of staff concerned through the supervision process. If necessary the member of staff can request additional external supervision or counselling during this period which can be authorised by the DSLCYP. If Local Authority Social Care need further information or involvement from the member of staff, the DSLCYP will talk with them and the member of staff about how this will happen.

Staff may also be subject to allegations of abusing children or young people. Any allegation of abuse will be dealt with under the gross misconduct procedures within WECIL and will result in suspension on full pay while an investigation takes place. During suspension, the member of staff will be offered support in the form of a person within WECIL who will be named to act as a contact point (this will be another manager other than the person who currently line manages them).

5.8 Confidentiality

Confidentiality is crucial to all our relationships - but the welfare of a child or young person is paramount. The law does not allow anyone to keep concerns relating to child abuse to themselves. Confidentiality may not be maintained if the withholding of the information will prejudice the welfare of the child or young person. Staff have a responsibility to share relevant safeguarding information with other professionals, particularly the investigative agencies. Any information sharing will be done in line with statutory guidance. It is important to remember there can be significant consequences to not sharing information as there can be to sharing. Staff must use their professional judgement to decide whether to share or not, and what information is appropriate. A record of what information has been shared, with whom, the date and why should be kept.

Parents or carers must submit a written request to access their child or young person's safeguarding records. Sharing confidential safeguarding information with parents or carers will not take place if doing so would put the child or young person at significant risk of harm. In the event of an investigation it is essential that no information on any safeguarding concerns relating to a child/young person or staff member is disclosed inappropriately. Any such leaks could have serious consequences for both the people concerned and any investigation. It is very important that only those who need to know actually know, to avoid rumours and gossip that could affect those personally involved and our organisation.

5.9 Recruitment of Staff

WECIL recognises that some people who seek to abuse children and young people will also seek employment which brings them into contact with them. We adhere to safer recruitment procedures as set out in the Department of Education September 2022 publication 'Keeping children safe in education'.

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education)

WECIL uses the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust. The DBS helps

employers make safer recruitment decisions and prevents unsuitable people from working with vulnerable groups.

All WECIL staff, unsupervised volunteers and Trustee members working directly with children and young people or with access to information about children and young people will undertake pre-selection checks which include the following:

- completion of an application form including self-disclosure about criminal records;
- an enhanced DBS with a barred list check;
- receipt of two references in accordance with WECIL recruitment and selection policy;
- verification of qualifications;
- verification of right to work in the UK;
- verification of identity; and
- any overseas checks if necessary.

All checks will be recorded on the Single Central Record (SCR).

A statement about commitment to safeguarding should be incorporated in any job advert. Prospective applicants will be supplied Section 1 of this Safeguarding and Child Protection policy. At least 1 Safer Recruitment trained staff or Trustee will be appointed to recruitment panels.

WECIL will ensure that, when requesting references for a paid member of staff, sessional workers or unpaid volunteers, the following paragraph will be included:

"In commenting on the applicant, please bear in mind that it is the organisation's duty to protect children, young people and adults at risk from harm, of a physical, emotional and sexual nature, and any information relating to their suitability for this work should be disclosed".

At interview, candidates will always be required to:

- explain satisfactorily any gaps in employment;
- explain satisfactorily any anomalies or discrepancies in the information available to recruiters including information supplied by their referees;
- answers questions about criminal history;
- declare any information that is likely to appear on a DBS disclosure; and
- demonstrate their capacity to safeguard and protect the welfare of children and young people and adults at risk of harm.

WECIL will make sound recruitment decisions based on what the DBS certificate presents, and will not discriminate against an applicant based on the result. However, if an applicant is on the children's Barred List, it will be illegal for them to be employed in a position involving close working with children and young people. WECIL will treat DBS applicants that have a criminal record fairly and will not discriminate against them based on criminal activity that is not relevant to their job role.

5.10 Complaints

If staff believe that WECIL has failed to implement its Child Protection and Safeguarding Policy properly, or believe they have been the subject of any form of discrimination, they should notify WECIL using the grievance procedure. Staff are reminded that any member raising a grievance in good faith, with reasonable grounds, has a right to be protected against victimisation for making such a grievance, even if the grievance is not upheld. Parents or a member of the public should use our Complaints Procedure to raise concerns. We take all complaints seriously and we undertake to investigate complaints promptly and respond in accordance with the appropriate procedure.

5.11 Escalation and Professional Challenge

Occasionally situations arise when professionals feel that a safeguarding decision made by someone else is not safe. Disagreements could arise in a number of areas, but are most likely to arise around:

- levels of need;
- roles and responsibilities;
- the need for action; and
- communication.

Staff at WECIL should feel able to challenge decision-making in regard to safeguarding and to see this as their right and responsibility in order to promote best practice. An escalation and professional challenge policy aims to provide workers with the means to raise concerns they have about decisions made by other professionals or agencies by:

- avoiding professional disputes that put children and young people at risk or obscure the focus on the child or young person;
- resolving the difficulties within and between agencies quickly and openly; and
- identifying problem areas in working together where there is a lack of clarity and to promote the resolution via amendment to protocols and procedures.

Effective working depends on an open approach and honest relationships between professionals. Problem resolution is an integral part of professional co-operation and joint working to safeguard children and young people. The safety of individual children and young people is the paramount consideration in any professional disagreement and any unresolved issues should be addressed with due consideration to the risks that might exist for the child or young person. Resolution should therefore be sought within the shortest timescale possible to ensure the child or young person is protected. Disagreements should be resolved at the lowest possible stage, however if a child or young person is thought to be at risk of immediate harm discretion should be used as to which stage is initiated.

If the disagreement is between a staff member and their manager then the staff member should consider our grievance procedure.

WECIL may occasionally find that the local referral agency does not take up a child protection referral that it is making in good faith. If we are concerned that the agency is not taking up a referral, we must first examine the content of the referral and ensure that the wording is congruent to the sense and wording set out in the local threshold document. If necessary, the referral can be rewritten and resubmitted. If the referral is still not taken up and we are still concerned we should discuss the matter with the local referral agency to gain more clarification. If necessary, the wording of the referral can again be rewritten and resubmitted. If the referral is still not taken up and we are still concerned, we can then organise a Multi-Agency Professionals' Meeting (MAPM) to voice shared concerns amongst professionals and gather more information. Any professional can call a MAPM if they feel that their concerns are not being addressed. It is good practice to inform parents that we are holding this meeting. The referral can then be resubmitted with the additional information acquired from the MAPM. If the referral is still not taken up and we are still concerned, we can then evoke the Bristol, South Glos, North Somerset or BANES Escalation procedures.