



Rolle House

Safeguarding children policy & child protection procedure

Version & Author	Date and update
V 2- Sarah Harding	18/08/2023- removed Tina Cureton acting Manager replaced with Sarah Harding Deputy Manager.
V3-Sarah Harding	31/10/2023- removed deputy manager and replaced with manager. Changed the language from staff to adult/adult team member.



Written November 2016
Author James Heaver
Reviewed August 2023
By Sarah Harding

Keeping children safe at Rolle House

“I feel safe and happy living in Rolle House” – Young Person

“We see safeguarding as the first responsibility of each member of staff at Rolle House. We aim to create unique and inspiring opportunities for our young people to develop but will always do this within a safe framework with vetted adult team members, a good awareness of risks for young people and different places, and strong relationships that help young people develop the skills to keep themselves safe as young adults. This policy sets out how we achieve such high standards and is regularly reviewed by all adults at Rolle House.”

Sarah Harding- Manager

Who's Who



Sarah Harding is the Manager at Rolle House and acts as the manager when Tina is unavailable. Please contact Sarah if you have any concerns about young people's care at Rolle House

t: 07947 735968

e: sjaneharding@thedeafacademy.ac.uk



James Heaver is the Responsible Individual and on the Safeguarding Team at the Deaf Academy. He is supervised by Sylvan Dewing, Principal. Please contact James if you are unable to address your concern with Tina and Sarah.

t: 07763 625110

e: jheaver@thedeafacademy.ac.uk



Sylvan Dewing is the Principal at the Deaf Academy and part of the Safeguarding Team. He has oversight over safeguarding at Rolle House. Please contact Sylvan if you are unable to address your concern with Tina or James.

t: 07814 680090

e: SDewing@thedeafacademy.ac.uk



Angela Pedder is the Chair of Trustees for the Deaf Academy

e: APedder@thedeafacademy.ac.uk

Our safeguarding team

Sarah, James, and Sylvan are our safeguarding leads and will ensure that any concern about a child is reported appropriately and investigated in line with agency recommendations.

Complaints

As well as talking to or emailing the adults above, young people or parents can make a complaint about something they have seen at Rolle House. Please see our complaints procedures for more details or contact Sarah on 07947735968



Who this document applies to

This document applies to all young people at Rolle House.

Anyone meeting our young people or visiting our home must abide by this policy.

Everyone working at Rolle House as a trustee, member of staff or volunteer has a duty to safeguard and protect our young people. They must read this policy and sign to say they agree to work to it.

Visitors to Rolle House such as contractors and visitors must read our safeguarding statement:

Keeping children safe is our top concern.

If on your visit you have any worries at all, please raise them with a adult team member or ask to speak to the Manager.

If you are still worried or do not feel able to share your concern with us, you can:

- Speak to James Heaver, the Responsible Individual, on 01395 203180
- Contact Devon Children's Services on 0345 155 1071
- If you have a serious concern about the home that we cannot deal with for you, please contact Ofsted on 0300 123 4666

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Our mission

Rolle House is a Therapeutic Children's Home specialising in caring for children or young people between the ages of 5 and 17, who are Deaf and have complex needs.

Our young people have great potential and achieve great things. We support this by developing their communication and life skills, building on strong relationships with peers, adult team members, family, professionals, and the local community. We support young people to be the best they can be and to effectively communicate their views, wishes and desires.

We also know there are risks to our young people living together in a home, such as isolation, bullying and abuse. The home places safeguarding at the core of its care planning to ensure the safety of those living within it. The home has an impact risk assessment and a location assessment which further ensures the reduction of safeguarding risks to the young people.

This document helps us keep this in mind, to pay attention to what we are told and what we see, and enables everyone – young people, parents, adult team members and visitors – to know what to do if they are worried about a child in our home.

Principles

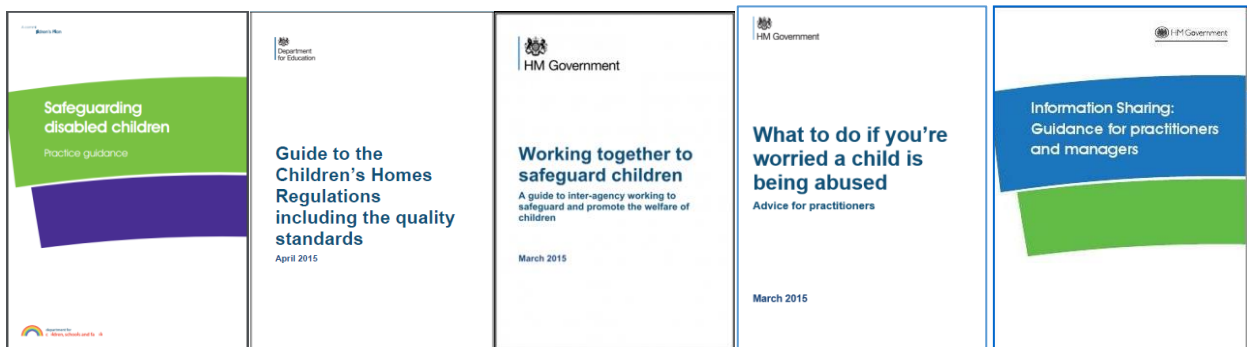
1. We **always** act in the best interests of each child.
2. We **listen** to any communication from young people or parents and always take concerns seriously.
3. We acknowledge there are **risks** to the young people in our care. Without proper care and vigilance, abuse or neglect of young people could happen at Rolle House. We talk about these risks with staff, parents and placing authorities, and together we plan carefully to keep them safe.
4. People **must** act if they are worried about a young person and keep acting until they believe the young person is safe.
5. We are **open** in our decisions and let parents and placing authorities know about concerns.
6. We will make it easy to raise a concern, and **anyone** raising concerns will be kept safe.

“Staying aware”

Being Deaf aware and valuing diversity

This policy and procedure apply to all children and young people regardless of gender, ethnicity, disability, sexuality, or religion. All our young people and many parents and adult team members are Deaf and have an equal right to be protected and a duty of care responsibility to act if they are worried. We will ensure we do not put barriers in their way and will support young people, staff, or parents to access interpreters whenever anyone needs to share a concern about a child.

If adult team members or volunteers behave in a way that discriminates against groups, we will take action to rectify things and consider whether this is a breach of our Code of Conduct.



The law

It's important every agency knows what to do if worried about a child. We follow the above national guidance so we are clear what to expect and can explain this to children and families.

Where there are specific risks, we will access other specific guidance – please see the full list in Appendix B.

Safeguarding and promoting the welfare of children is 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
- taking action to enable all children to have the best outcomes

Working Together 2018

'**Child protection**' is the systems and processes all agencies follow if there is reasonable cause to suspect a child is suffering, or at risk of suffering, significant harm (s47, Children Act 1989).

Safeguarding in Devon

We work within our [local Children and Families Partnership](#) which has specific procedures on:

- Child sexual exploitation
- Online abuse
- Female genital mutilation
- Human trafficking
- Forced marriage and honour killing.
- Domestic abuse
- Fabricating illness
- Radicalisation
- County Lines.

They follow the [Southwest Child Protection Procedures](#). Our procedures are compliant with the Southwest Procedures.

Devon has a [Multi-Agency Safeguarding Hub \(MASH\)](#). Where there is cause for concern about a young person at Rolle House, we will contact the MASH using their enquiry form or, in urgent situations, by phone on **0345 155 1071** (their answerphone has the out of hours number).

Most of our young people are placed by other local authorities. If we have concerns about young people at home, we contact the young person's social worker or make a referral to their social care team. When an incident happens in our home, we will contact both MASH and the young person's placing authority.

Identifying abuse & neglect

Abuse or neglect of a child can happen by someone inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults, or another child or children.

We know from research that almost half of Deaf young people in settings like ours have had unwanted sexual experiences, and that half of that abuse occurred in schools. We take steps to be extra careful, such as training all our staff in child and teenage sexual development, knowing what is acceptable and what to do if they are worried. We also work with young people to ensure they develop positive, enjoyable, and respectful relationships as they grow up. Where there are serious concerns, we always involve others such as parents, health professionals, police, or social workers.

There are four categories of abuse defined in Working Together and accompanying indicators which, if observed, should trigger you to carefully consider whether what you are seeing could be because of abuse. That something is or is not on the list does not mean that you can instantly rule in or rule out abuse as a possibility and if there is something that is causing you concern you should act on those concerns.

Physical abuse	Sexual abuse	Emotional abuse	Neglect
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Staff must be familiar with each form of abuse and what to look for. These are listed in Appendix A.

Young people are abused or neglected in a range of situations. There is specific guidance about the following situations, also in Appendix A.

If young people raise a concern...

Always take young people seriously, listen carefully and report this to the safeguarding team and Registered Manager.

Do...

- Listen and accept.
- Try not to interrupt.
- Reassure they have done the right thing by telling you.
- Explain what you are going to do next.
- Make accurate notes using all the child's words as soon as possible!
- Inform your manager or the safeguarding team

Don't

- Don't promise confidentiality.
- Don't investigate.
- Don't use leading questions.
- Don't ask the child to repeat the disclosure over and over.

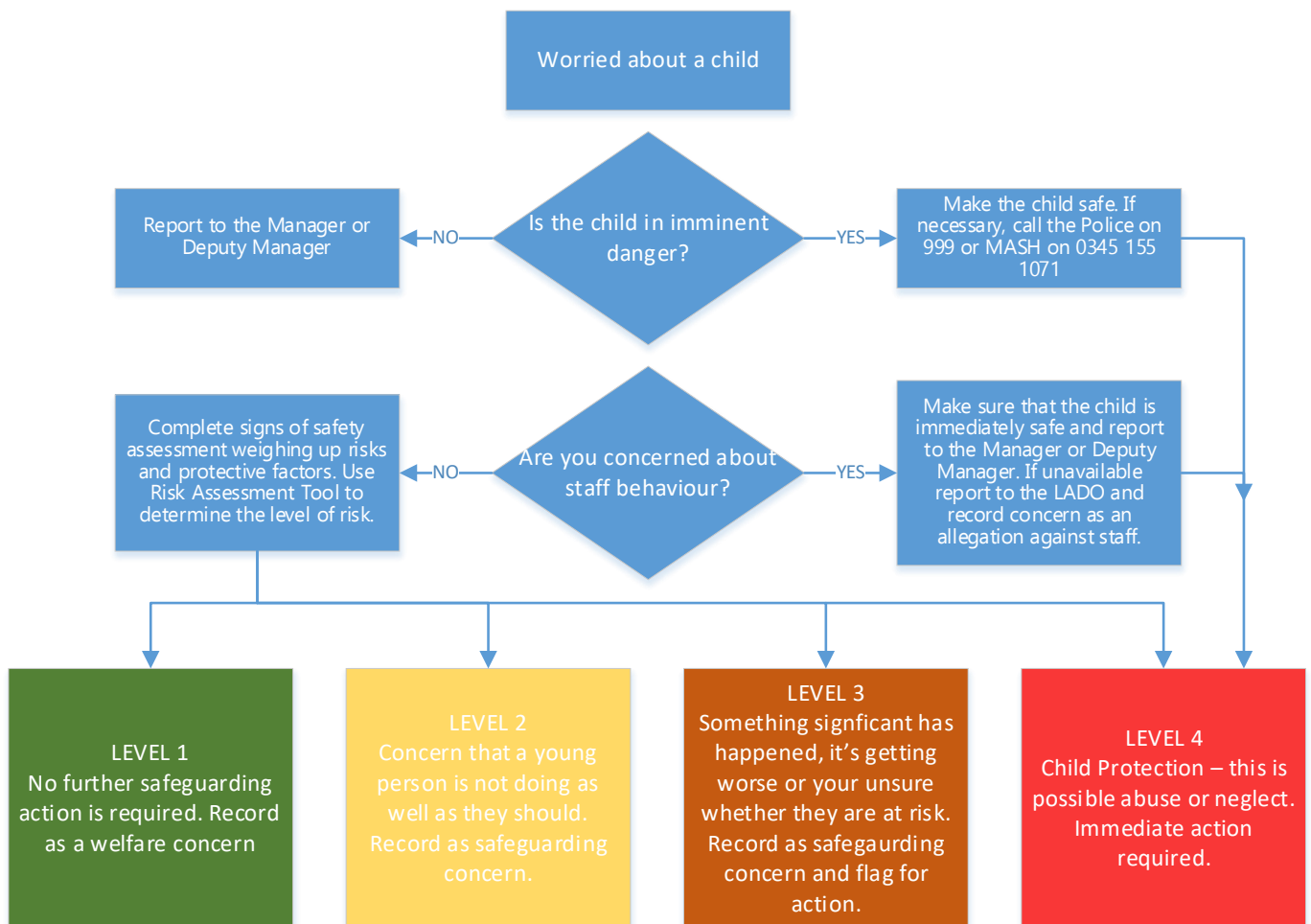
How should I respond?

Safeguarding our young people

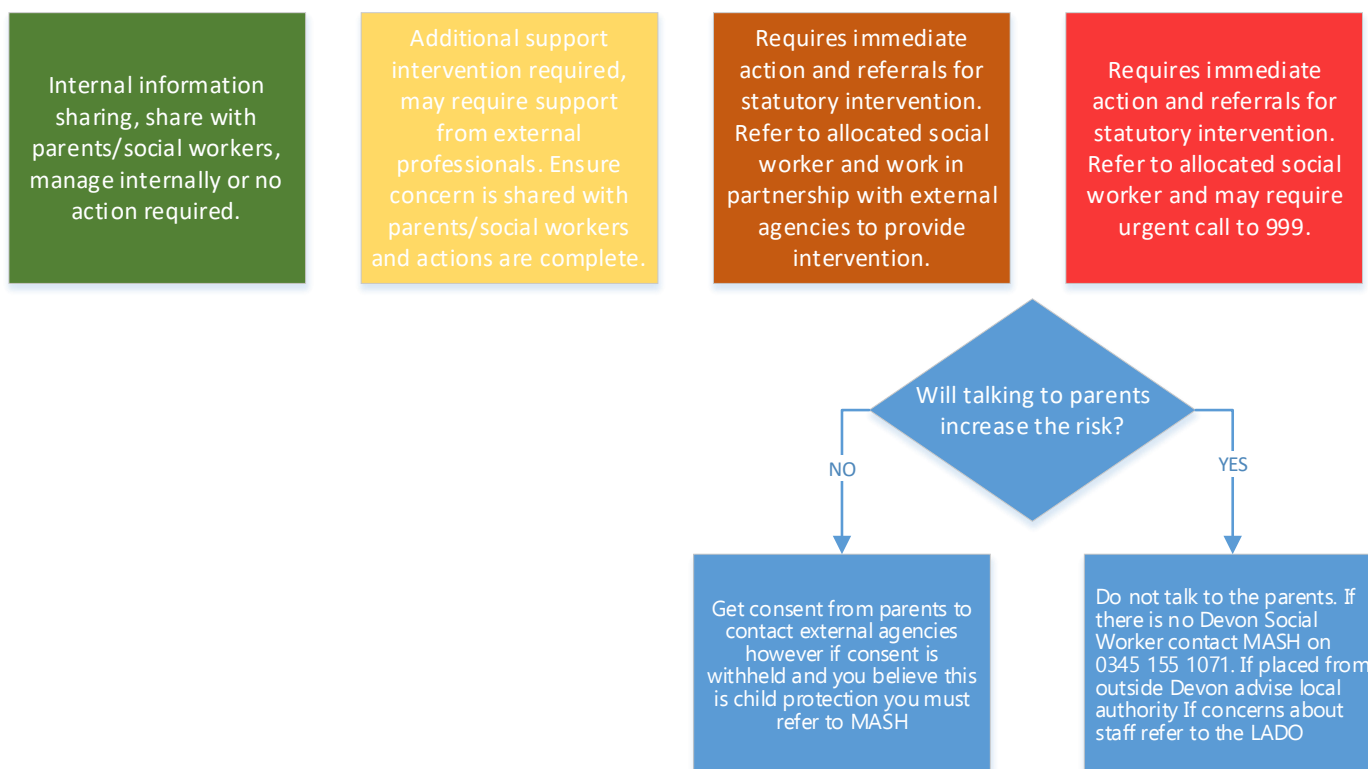
Worried that a child/young person is at risk of harm or abuse?



*If the concern relates to a staff member report to the Registered Manager/Responsible Individual. If it relates to the Registered Manager/Responsible Individual report to the Principal or Chair of Trustees



It is important that you are recording clearly your concerns about the risks and the needs of the child as well as your actions, and reasons, for those actions on Mentor. Use Signs of Safety Assessment to support in this process.



How do I tell if a young person is at risk of abuse or neglect?

It's difficult to be certain, but if you have a reason to worry then that's enough for us to talk more about the risk or to involve other agencies. Use the definitions of abuse or neglect in this document.

Risk Assessment

		Impact			
		Low	Concern	Harmful	Significant harm
Likelihood	Very unlikely				
	Possible				
	Suspected	LEVEL 1	LEVEL 2	LEVEL 3	LEVEL 4
	Likely				
	Almost certain				

Definitions

Wellbeing -Low LEVEL 1	No injury or cause for concern
Concern – early help LEVEL 2	A young person isn't doing as well as they should, although there is no evidence of harm. They may benefit from extra help. For example, a young person hits herself but has a plan in place to reduce occasions where this happens... on one occasion they hit themselves but do not leave a mark. We would want to review this periodically, or if it worsens.
Harmful LEVEL 3	Harm means ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another. For example, the above young person injures herself leaving a bruise. This will need to be explored further to establish why they have been harmed.
Significant harm LEVEL 4	Neglect, physical abuse, sexual abuse, or emotional abuse including for example, impairment suffered from seeing or hearing the ill-treatment of another. Any harm which may be attributable to an adult coming across a young person at work.

Very unlikely	An event that could happen, but is almost certain not to happen
Possible	An event that could happen
Suspected	There is an indication that something has happened or may happen
Likely	Something you believe is more likely to happen than not
Almost certain	Something that will happen unless action is taken

What to do if you are still worried...

Rolle House has an internal escalation process, and links with the [Devon Children and Families Partnership escalation policy](#).

Anyone worried about a child must continue to raise the concern until they have a reason not to be worried about the child anymore.



Every member of the adult team has an individual responsibility to the young people we work with to follow this process. There will be no reprisals for honestly raising a concern.

Where an immediate decision is needed, and a particular person is unavailable you may move to the next stage. The timescale for the process relates to the urgency of the decision, but in any event should not extend beyond one week.

Further information on whistleblowing can be found in the Whistleblowing Policy. This should be a last resort for adult team members.

Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect.

Information sharing advice for practitioners, 2015.

Sharing information internally:

Legally, we must share information within the team so that everyone who needs to know information to keep young people safe and help them develop does know.

When we are worried about a child it is essential, we record the concern and inform the Registered Manager promptly. Unless the concern is about our line managers, it is also important to let them know. Other people in the team will also need to know to provide safe care for the young person.

In exceptional circumstances information within Rolle House will be restricted, for example:

- Where there is an allegation about a member of staff the Registered Manager will decide with other agencies in a Strategy Discussion who must be aware of the concern.
- Where the detail of information is particularly sensitive this can be restricted, for example the details of sexual abuse or a young person sharing worries about their mental health or sexuality. Adults involved in their direct care will probably need to know in general terms the nature of the concern.

Sharing information with the Academy

Rolle House is a children's home independent of the Deaf Academy education provision. We share information with the education team in the same manner we would share information about a young person with any other school so that they can provide consistent and safe care. This is achieved by regular meetings, telephone calls and emails sharing information such as safeguarding/behavioural concerns.

We also share our risk assessment with the academy's education provision, so they are fully aware of any risks to or from each young person.

Sharing information with other agencies:

We are caring for after other people's children. We will provide a regular update for parents and placing authorities about how their young person is doing. The frequency of this will be set out in the placement plan. Where a significant issue arises (amber or red on our traffic light system) adult team members will ensure the parent is contacted within 24 hours and placing authority by close of the next working day for amber incidents, and immediately for red incidents. We also notify MASH immediately on red incidents.

Six principles for processing of personal data

The GDPR outlines six data protection principles you must comply with when processing personal data. These principles relate to:

- **Lawfulness, fairness, and transparency** - you must process personal data lawfully, fairly and in a transparent manner in relation to the data subject.
- **Purpose limitation** - you must only collect personal data for a specific, explicit, and legitimate purpose. You must clearly state what this purpose is, and only collect data for as long as necessary to complete that purpose.
- **Data minimisation** - you must ensure that the personal data you process is adequate, relevant, and limited to what is necessary in relation to your processing purpose.
- **Accuracy** - you must take every reasonable step to update or remove data that is inaccurate or incomplete. Individuals have the right to request that you erase or rectify erroneous data that relates to them, and you must do so within a month.
- **Storage limitation** - You must delete personal data when you no longer need it. The timescales in most cases are not set. They will depend on your business's circumstances and the reasons why you collect this data.
- **Integrity and confidentiality** - You must keep personal data safe and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

Accountability principle under the GDPR

Accountability is a new principle under the General Data Protection Regulation. It focuses on two key elements:

- your responsibility to comply with the GDPR.
- your ability to demonstrate compliance.
- Measures to help you meet the accountability requirement may include, for example:
 - implementing data protection policies and security mechanisms
 - agreeing data protection contracts with third-party processors
 - documenting your processing activities
 - recording and reporting, where necessary, of personal data breaches

- carrying out data protection impact assessments
- appointing a data protection officer

Safer Recruitment

We do our best to ensure we employ 'safe staff' by following the guidance given by the Local Safeguarding Children Board and our individual procedures.

Safer recruitment means that all applicants will:

- a) understand their duties to safeguard children from the outset through the advertisement and in their job description.
- b) complete and sign an application form which includes a full education and employment history (with explanations for any gaps)
- c) provide business contact details for two verified, formal referee statements following our own format, including at least one from someone who can comment on the applicant's suitability to work with young people (the last childcare employer if they have one) and one from someone who has known the candidate for at least 5 years.
- d) provide evidence of identity and qualifications
- e) be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role.
- f) provide evidence of their right to work in the UK.
- g) be interviewed by a panel of at least two people testing skills and abilities with Value Based questions against the job description including at least one person with safer recruitment training.

We ensure that recruitment documentation states our commitment to safeguard young people. We also verify the candidate's mental and physical fitness to carry out their work responsibilities. All new adult team members will undergo face to face induction training, which includes familiarisation with our safeguarding policies and procedures and support to identify their child protection training needs. All adults will sign to confirm that they have read and understood the safeguarding policies and procedures and attend relevant training.

Agency

We obtain written confirmation from supply agencies that agency staff have been appropriately checked, and their suitability to work with children at Rolle House will be assessed based on the children's needs.

The HR team maintains records of recruitment checks undertaken and the Registered Manager signs to evidence s/he has checked this documentation.

Supporting staff at Rolle House

Code of conduct

We have published a code of conduct which sets out expectations of staff around appropriate boundaries and adult team members keeping themselves safe, they sign to say they have read this document.

Emotional support

Having to deal with a situation where a young person has suffered, or appears to be likely to suffer, harm can be stressful and upsetting. We will support staff in a variety of ways, including a debrief with the Registered Manager or Deputy Manager. Where necessary confidential counselling services and additional resources will be sought.

Supervision

Adults involved in working directly with children, or supervising adult team members who do, will receive regular supervision. This supervision will take place at least six weekly (we aim for monthly) and will provide a space for the adult team member to talk about issues which they are facing in the work environment, thoughts that they have in terms of developing the service that is provided to the children, and discussion of the emotional impact of the role as well as any other issues that they consider relevant.

Supervision will also be used to reflect on any safeguarding issues that the adult team member has been involved in (directly or indirectly) and allow for agreement on any further action required.



Concerns and allegations about adult team members

Adult team members should take care not to place themselves in a vulnerable position with a young person. Adults must adhere to the risk assessment for Lone Working and Intimate Care policies. All adults understand that a young person may make an allegation against a member of the adult team.

Where it is alleged current adult team members (including volunteers) may have:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

the Registered Manager on all such occasions will discuss the content of the allegation with the [Devon County Council's Designated Officer](#) for the management and oversight of allegations. If the allegation concerns the Registered Manager, adult team members will immediately inform the Responsible Individual without notifying the Registered Manager first.

We follow the LSCB Procedures for managing allegations against adult team members and notify the DCC Designated Officer's team of the allegation/concerns. These can be found on the [Designated Officer's webpage](#). We will notify the DBS should any allegation made against a member of staff be upheld. Allegations about prior members of the team or historic allegations will be referred to the police.

Whistleblowing

Our team members occupy a vital position in promoting good practice and professional conduct throughout the organisation. We recognise that adults are committed to providing a high standard of service.

We recognise that young people cannot be expected to raise concerns in an environment where adult team members fail to do so.

All adults are aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If necessary, they should speak to the Designated Person or Devon's Designated Officer.

If a member of the adult team notices anything that gives them cause for concern it is vital that this is raised.

Acting upon team member concerns is fundamental to ensure good practice and support the adult team.

Resolving issues must be viewed by all adults as a positive action and not a breach of trust between colleagues or an attack on the organisation.

We value an atmosphere of openness and honesty and welcome suggestions, complaints, and criticisms.

Whistleblowing includes raising and passing on concerns about any of the following:

- a) Poor standards of service
- b) Issues of bad practice

- c) The conduct of colleagues or managers
- d) Anything which is not in the best interest of the young person or the organisation.
- e) Anything which is illegal or unacceptable behaviour.

Adult team member training

Principles

The **Registered Manager** will ensure all adult team members and volunteers have safeguarding children training relevant to their role. Our training is specifically tailored to ensure that adults have a good understanding of the risks that surround Deaf young people and gives them the tools to manage situations such as disclosures.

We see safeguarding training as an on-going process with safeguarding and child protection updates and reminders (for example, via email, supervisions, and adult team meetings) at least once a month.

New adult team members

The **human resources team** sends the appointment letter to new adults with links to the DSCB Group 2 e-learning and Keeping Children Safe in Education. On the first day of work the **Registered Manager** will:

- Go through the induction checklist.
- Ask the new adult team member to read all policies and procedures.
- Ensure they know what to do if they are worried about a child.
- Ensure they have read all placement plans so they are aware of each young person's individual risks.

At the probationary review new team member will be explicitly asked about any concerns they have for children at Rolle House and any other safeguarding issues they have identified.

Agency adult team members.

Agency adults working at Rolle House for a month, or more are required to meet the same standards as permanent team members.

Agency staff working for less than one month must read Part I of the current [Keeping Children Safe in Education](#). Their agency must provide written assurance the member of staff has safeguarding children training to the appropriate level for the role in the relevant period.



For Early Help, Consultation and Enquiries please contact:

Telephone: **0345 155 1071**

E-mail: **mashsecure@devon.gcsx.gov.uk**

Fax: 01392 448951

Enquiry Form available at:

www.devon.gov.uk/mash-enquiryform.doc

Post: Multi-Agency Safeguarding Hub, P.O. Box 723, Exeter EX1 9QS

Emergency Duty Team – out of hours

0845 6000 388

Police – nonemergency – 101

For all **LADO** enquiries Exeter (01392) 384964, or

<http://www.devon.gov.uk/lado>

Early Help Team

Senior Manager: Philippa Court

Exeter Team Manager: Stephen Matthewman **07790362310**

Northern Devon Team Manager: Sarah Simpson **07854304512**

South & West Devon Team Manager: Karen Hayes **07854253424**

Mid & East Devon Team Manager: Ian Flett **07815562370**

0345 155 1071, ask for Early Help earlyhelpsecure@devon.gov.uk

Appendix A – definitions of abuse, neglect, and specific situations

Physical abuse

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

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not

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

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- protect a child from physical and emotional harm or danger.
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment.

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

Indicators of abuse

Physical signs define some type of abuse, for example, bruising, bleeding, or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The definition of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone to categorise injuries into accidental or

deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the behavioural indicators of abuse and report any concerns to the Safeguarding Team.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who has been abused or neglected may:

- a) Have bruises, bleeding, burns, fractures, or other injuries.
- b) Show signs of pain or discomfort
- c) Keep arms or legs covered, even in warm weather.
- d) Be concerned about changing for PE, swimming or in the residential areas for bathing/ bed.
- e) Look unkempt and uncared for – present as smelly.
- f) Change their eating habits.
- g) Have difficulty in making or sustaining friendships.
- h) Appear fearful.
- i) Be reckless regarding their own or others safety.
- j) Self-harm
- k) Frequently miss school or arrive late.
- l) Show signs of not wanting to go home.
- m) Display a change in behaviour – from quiet to aggro, or happy go lucky to withdrawn.
- n) Challenge authority
- o) Become disinterested in schoolwork.
- p) Be constantly tired or preoccupied.
- q) Be wary of physical contact.
- r) Be involved in, or particularly knowledgeable about drugs or alcohol.
- s) Display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the Safeguarding Team and other agencies to decide how to proceed.

Specific issues

Adult team members must respond if they identify any of the following:

a) **Domestic Violence and Abuse**

We recognise that Domestic Violence and Abuse (DVA) has a significant impact on a child's development and emotional wellbeing and should always lead to a child protection referral through the safeguarding team to MASH / MARAC / Police.

DVA is very widespread and where staff have concerns for other staff members they should talk to their supervisor.

b) **Physical Intervention and Restraint**

Adult team members must read the Physical Intervention and Restraint policy and procedure and understand how to work with children in a person-centred way and learn to analyse the child's behaviour and respond in a proactive and caring way to reduce the stress displayed. Children will have individual placement plans and risk assessments which outline interventions to apply where necessary including DOLs orders if granted by the court that must be adhered to.

Our procedure on physical intervention and restraint is set out separately and acknowledges that adults must only ever use physical restraint as a last resort, when a child is endangering themselves or others, and that always it must be the minimum force necessary to prevent injury and applied for the shortest possible time.

All adults understand that physical intervention or restraint of a nature which causes injury or distress to a child may be considered a disciplinary matter.

c) **Bullying**

While bullying between children is not a separate category of abuse it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some children.

All incidences of bullying including cyber bullying and prejudice-based bullying should be reported and will be managed through our Anti-Bullying Procedure and in some circumstances could lead to a child protection referral. Tutors and keyworkers will work with individual children who have been bullied and those who have bullied others to assist them to understand their actions. If the bullying is particularly serious or if the procedures taken are ineffective the Safeguarding Team will consider implementing child protection procedures.

Adults, who allow or condone bullying may face disciplinary proceedings under the child protection procedures. This includes cyber, racist, homophobic and gender related bullying.

d) **Children with sexually harmful behaviour**

Children may be harmed by other children. Adults have been trained to recognise abusive behaviours, grading these using a recognised framework the Hackett's continuum, the Brooks traffic light tool and ultimately an aims3 assessment conducted by a trained individual. Where there is concern a young person may have been sexually abused the Devon MASH and each young

person's placing authority and parents will be contacted and we will plan together how best to respond.

e) Racist Incidents

We acknowledge repeated racist incidents, or a single serious incident may lead to consideration as a disciplinary matter and under Child Protection procedures. All racist incidents, including for example racist jokes, name-calling or excluding someone based on race, will be taken seriously, and must be reported to the Registered Manager.

f) Forced Marriages & Honour Based Violence

Forced marriage is when a person faces physical pressure to marry (e.g., threats, physical violence, or sexual violence) or emotional and psychological pressure (e.g., if you're made to feel like you're bringing shame on your family).

'Honour' based crime is intended to protect 'family honour' through violence, threats, insults, or other acts around forced marriage, where a cross-cultural relationship is suspected, or where other 'taboos' are broken such as wearing of non-traditional clothes or attending events that violate a family or cultural 'norms. If adult team members become aware of either possibility it must be reported immediately to the Safeguarding Team or the Police.

g) Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of sexual abuse that involves the manipulation and / or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection, or status. The victims can be male or female. The manipulation or 'grooming' process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. While young people may believe they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited. CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All adult team members must be aware of the indicators of sexual exploitation and all concerns reported immediately to the Registered Manager.

h) Female Genital Mutilation

Female Genital Mutilation is a form of violence against women and young girls and considered child abuse in the UK. It is a grave violation of the human rights of girls and women to life and their right to health. The UK Government has signed several international human rights laws against FGM, including the Convention on the Rights of the Child. Any adults who become aware that this may be planned or has happened for any young women living in the home must inform the Registered Manager immediately.

i) **One Chance Rule**

All adults are aware of the 'One Chance Rule' in relation to forced marriage, FGM and HBV. Adults recognise that they may only have 'one chance' to speak to a young person who is a potential victim and save a life.

j) **Trafficking and exploitation**

The two most common terms for the illegal movement of people – 'trafficking' and 'smuggling', are very different. In human smuggling, immigrants and asylum seekers pay people to help them enter the country illegally; after which there is no longer a relationship. Trafficked victims are coerced or deceived by the person arranging their relocation. On arrival in the country of destination the trafficked child or person is denied their human rights and is forced into exploitation by the trafficker or person into whose control they are delivered.

- Children are a special case, any child transported for exploitative reasons is a trafficking victim, whether they have been deceived. This is partly because it is not considered possible for children to give informed consent.
- Even when a child understands what has happened, they may still appear to submit willingly, to what they believe to be the will of their parents. Any concerns about trafficking and exploitation must be reported to the Safeguarding Team immediately.

k) **Radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- *Encourage, justify, or glorify terrorist violence in furtherance of beliefs.*
- *Seek to provoke others to terrorist acts.*
- *Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or*
- *Foster hatred which might lead to inter-community violence in the UK.*

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Children may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital our adult team members can recognise those vulnerabilities.

Indicators of vulnerability include:

- **Identity Crisis** – the child is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- **Personal Crisis** – the child may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- **Personal Circumstances** – migration; local community tensions; and events affecting the young person's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet Aspirations** – the child may have perceptions of injustice; a feeling of failure; rejection of civic life.
- **Experiences of Criminality** – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- **Special Educational Need** – children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all children experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

Preventing Radicalisation

To reduce the risks of children being radicalised we will:

- Ensure the Registered Manager completes the required training and develops a growing awareness of Channel across our staff group.
- maintain and apply a good understanding of the relevant guidance in relation to preventing children from becoming involved in terrorism and protecting them from radicalisation by those who support terrorism or forms of extremism which led to terrorism.
- raise awareness about our role and responsibilities in relation to protecting children from radicalisation and involvement in terrorism.
- raise awareness about the safeguarding processes relating to protecting children from radicalisation and involvement in terrorism.
- require the Registered Manager to act as the first point of contact for case discussions relating to children who may be at risk of radicalisation or involved in terrorism.
- collate relevant information from referrals of vulnerable young people into the Channel process.
- ensure the Registered Manager attends Channel meetings as necessary and carries out any actions as agreed.
- ensure that progress on actions is reported to the Channel Co-ordinator; and

- share any relevant additional information in a timely manner.

l) ESafety/online/internet use/sexting

Children are increasingly using mobiles phones, tablets, and computers daily. They are a source of fun, entertainment, communication, and education. However, we know that some adults and children will use these technologies to harm children. The harm might range from hurtful and abusive texts and e-mails, to enticing children to engage in sexually harmful conversations, webcam photography or face-face meetings. Our e-safety policy explains how we try to keep children safe in the home. Cyber bullying and sexting by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our Anti-Bullying procedure.

“Chatrooms” and social networking sites are the more obvious sources of inappropriate and harmful behaviour and children cannot access these on our IT system. We will work with young people on how to maintain their own safety and how to summon help if they are concerned about what they see online. Some children will undoubtedly be chatting on mobiles or social networking sites at home and parents are encouraged to consider measures to keep their children safe.

The staff Code of Conduct provides further advice and guidance regarding the use of social networking and electronic communication with young people in our care.

m) Photography and images

Most people who take or view photographs or videos of children do so for entirely innocent, understandable, and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that the following safeguards are in place.

While parents are permitted to bring in a camera to events, no adult team member should use their personal equipment to take photographs of young people. Rolle House provides equipment for this purpose.

Where an adult member has concerns someone is taking photographs in breach of this policy, they should contact the Registered Manager.

To protect young people, we need to:

- a) seek their consent for photographs to be taken or published (for example, on our website or in the newspapers or other publications).
- b) seek parental consent.
- c) use only the child’s first name with the image.
- d) ensure that the child is appropriately dressed.
- e) encourage children to tell us if they are worried about any photographs that are taken of them.

Adults should be aware that many indecent images in current circulation were taken by the child themselves or peers. Sex, sexuality, and relationships should be an age-appropriate topic in the home and include what to do if children are worried about an image they see.

n) Peer-on-Peer Abuse

In most instances, the conduct of young people towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise

safeguarding concerns. We recognise that children can abuse their peers. It will not be passed off as 'banter', 'part of growing up' or 'just having a laugh'.

o) County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom, exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market, and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over the age of 18 years.
- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females, and young people or adults.
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

p) Contextual Safeguarding

Contextual Safeguarding recognises that as young people grow and develop, they are influenced by a whole range of environments and people outside of their family. For example, in school or college, in the local community, in their peer groups or online. Children and young people may encounter risk in any of these environments. Sometimes the different contexts are inter-related and can mean that children and young people may encounter multiple risks. Contextual safeguarding looks at how we can best understand these risks, engage with children and young people, and help to keep them safe. It's an approach that's often been used to apply to adolescents, though the lessons can equally be applied to younger children, especially in today's changing world.

Appendix B - Other relevant legislation

When there are specific concerns about a child or family, we can access the following documents for guidance:

Working together to safeguard children, a guide to inter-agency working to safeguard and promote the welfare of children March 2015

Misuse of Drugs Act 1971

Keeping Children Safe in Education, DfE, September 2023.

Safeguarding Children and Young People from Sexual Exploitation, DfE 2017

Preventing and tackling bullying, DfE, 2014

SEND Code of Conduct, DfE, January 2015

Guidance for Safer Working Practice for Adults who Work with Children and Young People, Hall, Revised 2019

Safeguarding Children and Safer Recruitment in Education”, DCSF Guidance February 2014

Children missing education Statutory guidance for local authorities, DfE January 2015

What To Do If You Are Worried a Child Is Being Abused” 2003 –revised 2007'

Threshold Matrix December 2012

What to do if you're worried a child is being abused Advice for practitioner, DfE, March 2015

The Equality Act 2010

Safeguarding children who may have been trafficked, HMG, 2011

Protecting vulnerable people from being drawn into terrorism, DfE

Guidance on Private Fostering, DfE

Children Act 1989

Human Rights Act 1998

United Convention of the Rights of the Child 1991

Data Protection Act 1998

Sexual Offences Act 2003

Children Act 2004

Education Act 2002

Protection of Freedom Act 2012

Counterterrorism and Security Act 2015.

Female Genital Mutilation Act 2003

Serious Crime Act 2015

Malicious Communications Act 1988

Communications Act 2003

Public Order Act 1986.

Local Safeguarding Children Board Procedures (LSCB) 2019.

The Modern Slavery Act 2015

Keeping Children Safe in Education (DfE July 2016).

Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers, March 20