

Safeguarding - Child Protection Policy:

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Regulations and Standards:

The Children's Homes (England) Regulations 2015.

- Regulation 11 - The positive relationship standard
- Regulation 12 - The protection of children standard
- Regulation 31 - Fitness of workers
- Regulation 33 - Employment of staff
- Regulation 34 - Policies for the protection of children
- Regulation 40 - Notification of a serious event.

Policies for the protection of children

34. (1) *The registered person must prepare and implement a policy which—*

- (a) *is intended to safeguard children accommodated in the children's home from abuse or neglect; and*
 (b) *sets out the procedure to be followed in the event of an allegation of abuse or neglect.*

(2) *The procedure to be followed in the event of an allegation of abuse or neglect must, in particular*
 (a) *provide for liaison and co-operation with any local authority which are, or may be, making a child protection enquiry in relation to a child accommodated in the home.*

- (b) *provide for the prompt referral of an allegation about current or ongoing abuse or neglect in relation to a child to the placing authority and, if different, the local authority in whose area the home is located;*
 (c) *provide for the prompt referral of an allegation about past abuse or neglect in relation to a child to the placing authority and, if different, the local authority in whose area the alleged abuse or neglect occurred;*
 (d) *provide for records to be kept of an allegation of abuse or neglect, and the action taken in response;*
 (e) *describe the measures which may be necessary to protect children following an allegation of abuse or neglect; and*
 (f) *describe how and to whom staff are to report, without delay, any concern about abuse or neglect of a child.*

(3) *The registered person must prepare and implement a policy for the prevention of bullying in the home, which must in particular set out the procedure for dealing with an allegation of bullying.*

(4) *The registered person must prepare and implement a policy ("the missing child policy") setting out—*

- (a) *the steps taken, and to be taken, to prevent children from being absent without permission; and*
 (b) *the procedures to be followed, and the roles and responsibilities of persons working at the home, in relation to a child who is, or has been, so absent.*

(5) *Before implementing, or making an amendment which the registered person considers to be*



*substantive to, the missing child policy, the registered person must—
(a) consult, and take into account the views of, each relevant person; and
(b) have regard to any relevant local authority or police protocols on missing children.
(6) The registered person must keep under review and, as necessary, revise the home's child protection policies.*

Working Together to Safeguard Children 2023.

Please refer to the Local Safeguarding Children's Partnership within the County / Local Authority where the home is located.

Please also refer to the following internal policies and procedures:

Countering Bullying Policy.

Whistleblowing Policy.

Positive Behaviour Support Policy.

Absence Missing Children Policy.

Child Sexual Exploitation Policy.

Child Criminal Exploitation Policy.

Extremism and Radicalisation Policy.

E-Safety Policy

Lone Working Policy.

Notifiable Events Policy.

Recruitment and Selection Policy.

Code of Conduct Policy.

Introduction:

The aim of this policy is to protect children from abuse. All people have the potential for abusing a child and it occurs in all races, cultures, and social classes. It is important to consider that someone who abuses a child could be a member of their immediate or extended family, a friend, a neighbour, a stranger to them, a member of staff or another resident within the home. It is therefore essential to remain professional in our approach and objective and not make any pre-judgements.

HND Children's Care Ltd recognises its duty to make arrangements to ensure that functions are carried out with a view to safeguarding and promoting the welfare of a child. It is the intention of the procedures within this policy to ensure that the appropriate action is

taken immediately where it is alleged / suspected that a child is suspected of being abused. Furthermore, we intend to proactively reduce or mitigate potential risks and abuse through the implementation of our internal policies.

The prime concern at all times must be the interests and safety of the child.

HND Children's Care Ltd follows the guidance of the Local Safeguarding Partnership Procedures and 'Working Together to Safeguard Children 2023'



Aims:

- To protect children from abuse.
- To provide procedures for staff to follow when dealing with suspected abuse.
- To ensure staff understand the different types of child abuse.
- To raise awareness of staff regarding the signs of abuse.
- To ensure all staff are aware of their own responsibilities regarding child protection procedures relating to children.
- To identify methods to proactively ensure or improve the safety of children.
- To recognise the issues of confidentiality and offer advice.
- To provide support for staff who report, and for children who have disclosed, or been recognised as suffering, or at risk of suffering, significant harm.
- To provide safeguarding training for all staff and update on a regular basis.

Designated Safeguarding Lead:

- Registered Manager. In the absence of the Registered manager, or if concerns relate to the Registered Manager, all children, staff and professionals can contact:
- Responsible Individual.

1. Roles and Responsibilities:

Staff members:

All staff have a responsibility to be aware of the procedures to be followed if they are worried a child is being abused. Staff in regular contact with children are well placed to notice signs of physical, sexual, or emotional abuse, neglect, behavioural change, or failure to develop as expected.

Each member of staff is given the '*Safeguarding - Child Protection Policy*' which explains what to do and who to report to when they are first employed with HND Children's Care Ltd.

Multi-agency partnership:

HND Children's Care Ltd work in partnership with social services in both our local area and the child's local area if they have been placed out of county.

We also work in partnership with various external stakeholders, the Police, education authorities, health professionals etc., for example.

This multi-agency approach enhances the effectiveness of identifying and dealing with child abuse issues that may arise.

2. General Strategies:

Vetting of Staff:

There are careful selection and vetting of all staff, volunteers, and monitoring of visitors to the home to prevent children from being exposed to potential abusers. Recruitment of all staff and volunteers who work with children are subject to DBS checks these are



carried out on every member of staff. As a company, HND Children's Care Ltd will place all employees on the DBS update service and regular checks are undertaken to ensure there is no change in the status of the DBS. HND Children's Care Ltd are committed to ensuring all relevant safer recruitment procedures relating to children are checked and ID confirmed.

Induction of Staff:

As part of the induction programme, HND Children's Care Ltd cover such issues as who to report concerns to, clarifying the procedure; ensuring the member of staff know where to access the local Safeguarding Partnerships Procedures for example. HND Children's Care Ltd also provide the local safeguarding procedures for other areas if we have young people in out of area placements. All staff complete safeguarding training as part of the mandatory training during the induction Process. During the induction process, staff are made aware of / trained regarding the following:

- Statement of Purpose.
- Children's Guide.
- Location Risk Assessment.
- Children's Care Plans.
- Children's Risk Assessments.
- All policies.

Training of Staff:

All staff are expected to complete specific training in order to enable them to effectively undertake their roles.

HND Children's Care Ltd has a 'Workforce Development Plan' in place that identifies training required to be completed at the point of induction, and then refreshed periodically; this is inclusive of:

- Safeguarding Training.
- Online Safety Training.
- Anti-Bullying Training.
- Behaviour Support Training.

Children's Rights:

Keeping a child safe from harm is our priority at all times, children's own views and wishes must be respected and given voice in all matters relating to their care. Children's opinions are sought over key decisions which are likely to affect them, their privacy is respected, as far as is consistent with good parenting and their need for protection. All matters related to child protection concerns are kept confidential, with access only to those who need it for the child's protection. Child protection records are stored



securely, either physically, or via our online secure storage systems, away from the child's own main file and secured with access clearly defined – only the Registered Manager and Responsible Individual have access to these.

Children know how and are able to complain if they are unhappy with any aspect of living within our homes – this is discussed at the point of admission. We endeavour to ensure that children feel confident that any complaint is addressed seriously and without delay.

Countering Bullying Policy:

HND Children's Care Ltd has, and follows, a countering bullying policy, with which children and staff are familiar. Children who are bullied are supported, and those who may bully others are also subject to a risk assessment. Each will have a plan outlining actions to address and support issues identified. We recognise the fact that bullying is the form of abuse most children fear. The Registered Manager will review all bullying incidents in order to take action where feasible to reduce or counteract the risk of bullying.

Missing Children:

HND Children's Care Ltd has procedures to follow in the event of any child being absent without authority / permission. These procedures are known to staff, the child, and their parents (if applicable) and are in place to ensure that the children are protected as quickly and as far as possible. Children are visited upon their return by an independent person, offering an independent opportunity to discuss the reasons for their absence, and if abuse is cited, a referral is made which follows local authority safeguarding procedures.

Contextual Safeguarding / Assessment of Risk Outside the Home:

Children may also be at risk outside of our home, and it is essential that all staff are aware of potential risks.

There is a whole range of risks that children can face outside of the home environment. Many of these are high profile issues that regularly make the newspaper headlines – criminal and sexual exploitation, gangs, serious youth violence, and harmful sexual behaviour to name just a few.

For some children, a safe, loving, and protective home environment is not enough to protect them from these risks.

Even prior to the admission of children into our homes, managers are expected to undertake a detailed 'impact risk assessment' that considers all known and presumed risks, and ultimately, make the judgement regarding whether the home, the environment, staff team and other children can cope and manage any risks presented. General risk management measures for our children are as follows: - Detailed and current risk assessments MUST be in place for all children – these MUST be completed in agreement with the child's local authority.

- Detailed and current behaviour support plans MUST be in place for all children.
- Detailed and current internal care plans MUST be in place for all children.



- Detailed and current missing from care procedures MUST be in place for all children.
- All staff MUST be trained in safeguarding, safeguarding children with LD, anti bullying and behaviour support – restrictive physical intervention, as a minimum.
- Staff should always endeavour to develop positive and meaningful relationships with children.
- Staff should be supervised regularly, in accordance with each home's statement of purpose and trained as per each home's workforce development plan – additional training, learning and development opportunities should be provided to improve staff skills and knowledge.
- Each home should have clear structures, routines, and boundaries in place for both staff and children to follow.
- The sharing of information regarding care and risk should occur promptly, efficiently, and effectively with our multi agency partners relevant to individual children.
- Effective monitoring and quality assurance processes MUST be in place that identify areas for improvements / learning outcomes.

Monitoring:

This policy document will be reviewed annually and monitored on a regular basis. The Registered Manager will evaluate the recording pro-formas and the effectiveness of the procedures whenever they have had on occasion put them into practice.

Use of CCTV:

CCTV may be installed at the home to provide additional protection to the children, staff, visitors, the home itself, and its vehicles.

The local authority are made aware of the use of CCTV prior to admission of new children or during placement if required – the use of CCTV is identified within each services statement of purpose.

CCTV will not be used in any of our services for direct surveillance, or as a substitute to having staff physically working within our services – it will exist for additional security only externally and will NOT be utilised in safe spaces, i.e., not in the bedrooms or bathrooms, and only on external areas.

E-Safety:

HND Children's Care Ltd recognise that the use of the internet, and particularly social media sites, can increase the likelihood of risk for some children.

Our general strategies to maintain safety, as identified in our 'E-Safety Policy' are:

- The homes internet is filtered, i.e., inappropriate content such as pornography, drugs, gambling etc. are filtered and blocked via our modem – staff must regularly check the integrity of this filter system.
- Ensure children set their privacy settings appropriately.
- Pay attention to what information children are posting if possible. - Encourage children to share their social networking experiences with an appropriate adult.



- Encourage children to engage in discussions and education / training regarding internet safety.
- Ensure that all staff are trained in regard to online safety.

Any breaches of internet safety should be reported to the home's Registered manager immediately, and also each child's social worker and parent (if appropriate); remedial action must be taken promptly – please refer to our 'E-Safety' policy for further information.

Referral and matching Processes:

All children will be assessed in regard to their risks, and whether we feel able to manage their risk prior to admission; this is inclusive of assessing whether we feel that each child is compatible to live with other children living within our home.

The matching process will consider:

- The location of the home is relation to safety for children.
- The resources in the local area.
- The skills and training of the staff team.
- The risk of other children accommodated, and whether these would increase others risks. Registered Managers are expected to undertake a detailed 'impact risk assessment' that is designed to:
 - Evidence why HND Children's Care Ltd feel that we are the correct placement.
 - Evidence how HND Children's Care Ltd will keep each child safe.
 - Identify initial risk prevention strategies.

Furthermore, if our home is designed to accommodate more than one child, managers are expected to consult with children already living within our home prior to others moving in; HND Children's Care Ltd believe that being transparent and planning well in advance will naturally minimise the impact of new admissions, and also risk.

Where possible, HND Children's Care Ltd will endeavour to ensure that any new admissions visit the home prior to moving in, this will allow them to see the home for themselves, get a 'feel' for it, meet the staff, meet other children, and ask any questions that they may have.

2. Support & Supervision:

Staff:

Staff have formal individual supervision sessions with the Registered Manager / senior staff. Support is always available to members of staff who may be involved in a child protection investigation.

Family:

Parents can request to see the 'Safeguarding - Child Protection Policy' if they would like to find out more information about our procedures.



4. Explanation of Terms and Concepts:

Child Abuse:

Acts done deliberately or 'failure to do' by staff with caring responsibility and / or relationship of trust which cause children to suffer significant harm.

Child Sexual Exploitation:

The involvement of young people of either gender in the exchange for sexual acts for rewards can be tangible such as money, food, drugs, gifts, or intangible such as shelter, protection, praise etc. what marks out exploitation is an imbalance of power in the relationship. Exploitation will involve coercion, intimidation, enticement, bullying and grooming. It is important to recognise that not all children will exhibit external indicators of this abuse.

Sexting:

Sexting is when someone shares sexual, naked, or semi-naked images or videos of themselves or others or sends sexually explicit messages. Images can be sent using mobiles, tablets, laptops, or any device that allows you to share media and messages.

Cyberbullying:

Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks, games, and mobile phones. Cyberbullying can include spreading rumours about someone or posting nasty or embarrassing messages, images, or videos. Children may know who is bullying them online, it may be an extension of offline peer bullying, or they may be targeting someone using a fake or anonymous account.

Honour based violence / abuse:

Honour based violence (HBV) and honour-based abuse (HBA) is a reference to a crime which have been committed under the form of protecting or defending the honour of the family and / or community, these include Female Genital Mutilation (FGM), forced marriages and practices such as breast ironing. All HBV / HBA are abuse and should be treated and escalated as such.

Radicalisation and Extremism:

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic, or social conditions, institutes, or habits of the mind. Extremism is defined as the holding of extreme political or religious views.

Neglect:

Lack of food, shelter, medical / dental treatment.



Emotional Abuse:

Lack of love, indifference, belittling, criticism, taunts

Physical Abuse:

Touch, molesting, forced sexual acts (such as oral sex), rape (vaginal and/or anal)

Additional information and explanations can be found via the following link: <https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>

5. Concerns Involving a Member of Staff:

Any concerns that involve allegations against a member of staff should be referred immediately to the Registered Manager, who will in turn contact the Local Area Designated Officer (LADO) / Designated Officer (DO) to discuss and agree further action to be taken in respect of allegation. Any child protection allegation concerning the Registered Manager should be referred to HND Children's Care Ltd Designated Safeguard Lead (if this is the Registered Manager, then the matter should be referred to the Responsible Individual or Director), who will seek the assistance of the LADO / DO.

Safe Working Practice:

All staff should take normal precautions not to place themselves in a vulnerable position with relation to Safeguarding / Child Protection. Staff must understand that failure to report actual or reasonably suspected physical, sexual, or emotional abuse or neglect of a child is a disciplinary offence.

Professional Boundaries:

All staff are expected to maintain professional boundaries with the children living within our home / s.

Staff are expected to develop relationships with our children, in order to support, guide, educate and promote positive outcomes, however, staff must ensure that this is done safely, so as to protect both staff, and children from the potential of abuse. HND Children's Care Ltd has an in depth 'Code of Conduct' in place, as well as specific policies. Our 'Safe Working Practice Agreement' in Section 7 of this policy discusses examples of expectations of our staff, and examples of professional boundaries.

6. Child Protection Procedure:

Introduction:

Child protection procedures are followed in accordance with the Safeguarding Children Partnership Procedures. All people have the potential for child abuse, and it occurs in all races, cultures, and social classes. It is important to consider that someone who



abuses a child could be a member of their immediate or extended family, a friend, a neighbour, a stranger to them, a member of staff or another child within our own homes. It is therefore essential to remain professional in our approach and objective in our judgement, and not to make any assumptions because of our knowledge of the person(s) involved.

Duty to Refer:

It is the duty of all staff to immediately refer any child protection concerns about a child to the Registered Manager. It is the duty of the manager to consult with, and refer this, to the Safeguarding Partnership. If as a member of staff, you are not satisfied with the manager's response, you should speak to HND Children's Care Ltd' Responsible Individual or Director.

Recognising and Responding to Concerns:

It is important to remember that children rarely talk about their own abuse for many reasons, and staff need to be vigilant to physical, emotional, sexual, and behavioural signs which may suggest abuse. If a child chooses to confide in you, disclosing any form of abuse, the most important thing to do is to listen attentively without asking any leading questions. The child must tell their own story, in their own time. Even what seems to be an unbelievable story must be listened to and acted upon. It is at this stage when you make any notes, you must use the child's own words, or the words in which anyone else reports to you, and they must be kept in their original form. Please see the section on 'recording of disclosures and concerns'.

Suspicion of Abuse:

If a member of staff suspects a child may be at risk or hears a disclosure from a child / young person, then the Registered Manager must be informed, and this raw data must be documented. The member of staff will then be asked to document their suspicions and include any evidence, to provide an accurate account of any discussions or observations regarding the child concerned. Any records / documents are then passed to the Registered Manager as they are confidential documents and are kept in a separate child protection file which is secured.

Child Sexual and Criminal Exploitation (CSE / CCE):

Any member of staff who suspects a child may be involved in exploitation must follow the same procedures as above and inform the Registered Manager.

See 'Child Sexual Exploitation Policy'.

Absence of a Child / Young Person:

HND Children's Care Ltd will take steps to ensure that a child who is absent from care without consent are protected in line with:

- A thorough search of the grounds.
- A report to the police, the parents (if appropriate) and to the child's placing



authority – timescales for this are available on each child's individual risk assessment.

- Information gathering to ensure the safety and welfare of the child.
- The collection and return of the child when found / return interview.
- A MFH Report should be recorded, including any action taken.

Please note, it is HND Children's Care Ltd policy that, in the instance of a child being missing from our care, staff will continually search for the child where reasonable, proportionate, and safe to do so.

See '[Absence Missing Children Policy](#)'.

Our homes operate our missing from home strategies in line with:

Greater Manchester – Philomena Protocol.

Recording of Disclosures / Concerns:

If notetaking is inappropriate, or not possible at the time, the member of staff involved should immediately afterwards document any and all key points, using the child's own words and phrases. These documents must be kept as original, timed, dated, and signed, as they could be used as evidence in court. As soon as possible the member of staff should contact the Registered Manager the information should be confidentially passed on to the home's Registered Manager and / or Responsible Individual.

Disclosed information from a child cannot be discussed with any other member of staff, other than the Registered Manager, unless the disclosure may potentially put the safety of others at risk.

Physical Evidence:

If any physical injuries or bruising are noticed it is appropriate, as a caring adult, to ask the child how they sustained the bruise, graze, scratch, bite, or other marks on their body. If there is any doubt about the child explanation, the injury not corresponding, or you have further concerns, then a body map should be filled in, for marks easily visible, (i.e., do not examine the young person beneath their clothing) and refer the information and documents to the Registered Manager and / or Responsible Individual with the other relevant documents and evidence.

Working with Parents / Carers:

The Registered Manager and other professionals should aim to work in partnership with parents and carers by attempting to discuss any concerns they have with them where possible. Permission should be sought by the Registered Manager, from the person holding parental responsibility for the child, before discussing a referral about them with other agencies, unless this process may in itself place a child / young person at risk of significant harm or prejudice a criminal investigation.



Making a Referral:

When the Registered Manager has been informed of a case of suspected abuse, or of a child who may be at risk of abuse, they will pass this information on to the allocated Social Worker. Reporting the matter must be given priority. Any delay may put the child in further danger. A written referral will then be sent to the Safeguarding Partnership within 48 hours, which should be acknowledged within one working day.

Support for Children Following a Referral:

HND Children's Care Ltd allow the child to choose an adult to accompany him / her, if he / she so wishes, to any interview, which may take place as a result of Child Protection assessment, to offer support. However, we respect the wishes and feelings of the children should they want to be on their own. If a child requires support from staff, this will normally be granted in discussion with the Registered Manager. Interviews with the child are usually undertaken by social workers and police who are specially trained, and these can be undertaken at the home, or at a special video interview suite, whatever is appropriate.

Support for Staff:

Staff will be given support via the Registered Manager and / or external professionals such as therapists / counsellors if required and if appropriate.

Issues of Confidentiality:

If a child requests confidentiality, they must be told that this cannot be promised, and it should be explained that staff have a responsibility to share information with those professionals who will be able to help protect them from harm. The child should be reassured that only those who need to know about it will be told. This could result in the child not continuing the conversation, in which case the matter should not be pursued but concerns reported to the Registered Manager. Staff have a professional duty to share confidential information about the protection of the child with the Registered Manager. Staff should take care not to discuss information given in confidence outside the appropriate professional contexts.

All documentation regarding the disclosure should be treated and marked as HIGHLY CONFIDENTIAL and should only be shared with others on a need-to-know basis. This information will be secured, and access restricted within the Safeguarding / Child Protection File.

Child Protection Records:

Child Protection information will be held in a confidential child protection file in a secure place with restricted access. A care leaver's child protection information should be kept in a secure location until his / her 25th birthday, the information should then be provided to the child's local authority.

Concerns Involving a Member of Staff Facing Allegations of Abuse:

The Registered Manager should consult with LADO / DO for advice without delay. In the



case of an allegation against the Registered Manager, the Responsible Individual or Director must act, with the advice of the LADO / DO. Any allegations should be reported immediately, and not discussed with anyone else, particularly the person alleged against. If staff have any concerns about practices which they feel may put a child / young person at risk of abuse or serious harm, they should raise these first with the Registered Manager. If they are not satisfied with the way in which the Registered Manager is dealing with the situation, then they should speak to HND Children's Care Ltd' Responsible Individual or Director.

Reporting:

Allegations of abuse should be reported to the Regulatory Authority (Ofsted), as per guidance in Regulation 40 and:

<https://www.gov.uk/guidance/tell-ofsted-about-an-incident-childrens-social-care-notification>

7. Safeguarding Children:

HND Children's Care Ltd is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment.

This means that we have a Safeguarding - Child Protection Policy in place. All staff (including agency staff and volunteers) must ensure that they are aware of these procedures. Parents, carers, and children are welcome to read the policy on request.

Sometimes we may need to share information and work in partnership with other agencies when there are concerns about a child's welfare. We will ensure that our concerns about our child are discussed (age appropriately with him/her) and his/her parents / carers first unless we have reason to believe that such a move would be contrary to their welfare.

If you are concerned about a child's welfare, please inform the home's Registered Manager without delay. Do not conduct your own investigation.

If your concerns relate to the actions or behaviour of a member of staff (which could suggest that s/he is a danger to a child) then you should report this immediately to the Registered Manager in confidence, who will consider what action to take.

Safeguarding Children - Safe Working Practice Agreement:

HND Children's Care Ltd is committed to safeguarding and promoting the welfare of any child and expects all staff and volunteers to share this commitment.

It is everyone's responsibility to ensure that all children are cared for appropriately and safeguarded from any harm, and their duty of care to promote the health, safety, and welfare of all members of HND Children's Care Ltd and the community.



The staff 'Code of Conduct' gives clarity to the measures needed to ensure that all employees and children can work within and enjoy being part of a safe and caring environment.

It is acknowledged that the vast majority of employees behave appropriately whilst working with children. Whilst it is recognised that the individual members of an organisation may hold differing values and opinions, staff working with children are in a position of trust and their conduct is, therefore, governed by specific laws, guidance and policies and procedures.

The following is, therefore, a code of appropriate conduct for all staff working in HND Children's Care Ltd, including all stakeholders involved in any aspect of our children's care. Adherence to this code should ensure that both the children and staff are safe from misconduct or unfounded allegations of misconduct.

You should always:

- Adhere to all policies, many of which are specifically written with safeguarding in mind. For example: Safeguarding, Bullying, Equal Opportunities, Health, and Safety.
- Behave in a mature, respectful, safe, fair, and considered manner at all times.
- Provide a good example and 'positive role model' to the child.
- Observe other people's right to confidentiality (Unless you need to report something to the Manager e.g., concerns about a child protection issue).
- Treat all children equally; never build 'special relationships' with individual children or favour a particular child / young person.
- Report to the Registered Manager (or in the case of an allegation concerning the Registered Manager, the Responsible Individual and / or Director)
- as soon as possible:
- Any behaviour or situation which may give rise to complaint, misunderstanding or misinterpretation.
- Any difficulties that you are experiencing, for example, coping with negative behaviours: situations where you anticipate that you may not be sufficiently qualified, trained or experienced to deal with or handle appropriately.
- Any behaviours of another person working in the home which gives you cause for concern or breach of this code of conduct or other policies and procedures
- you should never

Behave in a manner that could lead a reasonable person to question your conduct, intentions, or suitability to care for children.

- Touch a child in a manner which is or may be considered sexual, threatening, gratuitous or intimidating.
- Discriminate either favourably or unfavourably towards any child.
- Make arrangements to contact, communicate or meet children outside of work.
- Develop 'personal' or sexual relationships with a child, even after they leave care.
- Make inappropriate remarks or jokes of a personal, sexual, racial, discriminatory,



intimidating or otherwise offensive nature.

- Intentionally embarrass or humiliate children, for example, by using sarcasm or humour in an inappropriate way.
- Give or receive gifts unless arranged through your Manager for example, outgrown sports kit, football boots etc.
- Allow, encourage, or condone children to act in an illegal, improper, or unsafe manner e.g., smoking or drinking alcohol.
- Behave in an illegal or unsafe manner, for example, exceeding the speed limit, being under the influence of drugs or alcohol, driving a vehicle which is known to be un-roadworthy or otherwise unsafe or not having appropriate insurance, using a mobile phone whilst driving, fail to use seatbelts and drive in a safe manner at all times whilst transporting children.
- Undertake any work with children when you are not in a fit and proper physical or emotional state to do so. For example: under the influence of medication which induces drowsiness; with a medical condition which dictates that you should not be caring for young people; under extreme stress which is likely to impair your judgement.

It is the perception of the person subject to a remark or action rather than your stated intention that defines 'appropriate' or 'inappropriate'.

8. Processes:

Process – Child makes an allegation towards a staff member (Manager to follow): Child makes an allegation towards a member of staff.

1. Staff on duty must record everything as the child said it. Explain to the child that it will need to be passed on to the manager and that it cannot be kept as a secret.
2. Is the child safe / secure / require medical attention? Address this before anything else.
3. If bruises / marks are evident on the child, please ensure a body map is completed.
4. Staff to immediately make the homes manager aware of the allegation. The Registered manager must make arrangements for the child and staff member to be separated such as suspension / change of workplace etc. Please note, if the allegation is against the home's manager, staff to contact the Responsible Individual. Manager to ensure the staff member reporting the allegation keeps all information private and confidential. Manager to contact LADO / DO immediately. Do not confront the person subject to the allegation. Manager to inform, if necessary and appropriate – EDT (if out of hours) social worker, parent / carer, police, RI, OFSTED (Notification must be submitted). Take advice from LADO / DO.
5. All forms of communication and actions completed must be documented and stored securely.
6. Decisions must be made as to whether or not the child needs to change



placement temporally or staff working location changed temporally or if suspension is necessary.

7. LADO / DO must respond / make contact within 24 hours. If you do not hear from them, you must try to make contact again. A LADO / DO notification must also be submitted to the LADO / DO immediately.
8. The Home's Registered Manager, Responsible Individual or Designated Safeguard Lead should consult with LADO / DO and consider recommendations from the Strategy Discussion and come to a decision about what actions to take in relation to any staff implicated.

This will include the following:

- Whether to suspend any member of staff pending investigation.
- What support to provide for any member of staff.
- Information about the enquiries / investigations that should be given to other staff / managers.
- The arrangements for notifying the Regulatory Authority.
- Who will act as lead / co-ordinator of the ongoing case until the enquiries / investigations are complete? Any decision to suspend any member of staff should account for:
 - A child may be at risk.
 - The allegations are so serious that dismissal for gross misconduct is possible.
 - Suspension is necessary to allow the conduct of the investigation to proceed unimpeded.

Ensure that a LADO / DO outcome form is also sent to LADO / DO once the investigation is concluded and if necessary, a DBS referral.

Process – Child makes an allegation towards another child in placement or external: Child makes an allegation towards another child.

1. Staff on duty must record everything as the child said it. Explain to the child that it will need to be passed on to the manager and that it cannot be kept as a secret.
2. Ask the child if they require any medical treatment. Respond, as necessary.
3. Staff immediately make the homes manager aware of the allegation. Manager to ensure the staff member reporting the allegation keeps all information private and confidential. Manager to contact Social Worker immediately and the other child's social worker if applicable. Do not confront the person subject to the allegation. Manager to inform, if necessary and appropriate – EDT (if out of hours) social worker, parent / carer, police, RI, OFSTED / safeguarding partnership.
4. All forms of communication and actions completed must be documented and stored securely.



5. If bruises / marks are evident on the child, please ensure a body map is completed.
6. Decisions must be made as to whether or not the child needs to change placement temporally if the accused child is in placement. If the accused child attends school / outside activities, these establishments may also need to be informed. The child may refuse to attend once a disclosure has been made.
7. Social Worker/s must respond / make contact within 24 hours. If you do not hear from them, you must try to make contact again or speak to EDT / Duty.
8. The home's Registered Manager or Designated Safeguard Lead should consult with the social worker/s and ensure a strategy discussion / meeting is arranged ASAP and consider recommendations from the Strategy Discussion and come to a decision about what actions to take. This will include the following:
 9. Information about the enquiries / investigations that should be given to other staff / managers.
 10. The arrangements for notifying the Regulatory Authority.
 11. Who will act as lead / co-ordinator of the ongoing case until the enquiries/investigations are complete?
 12. A child or young person may be at risk.
 13. Possible placement moves for either child.
 14. Increased staffing levels.

END.