**Safeguarding Young People Policy**

**Policy Statement**

This policy aims to protect and support the users of our service from harm and maltreatment by giving the staff team a clear and concise understanding of the safeguarding picture that covers our young people’s lives and well-being, and ensuring they can reach the right people in the right timeframes with the right information.

This policy and the supporting policies are freely available on request from Ioi Support. We believe safeguarding is a universal duty as a service and parents (where appropriate), key stakeholders and young people all have a part to play in safeguarding. All staff, including volunteers, are expected to understand the safeguarding and whistle-blowing policies and so they will form part of their induction and training package.

**Principles of Young Person Safeguarding**

The management of Ioi Support is committed to the following principles regarding the abuse of a young person.

It is recognised that abuse can and does occur in society and that this may take the following forms:

* verbal abuse/threats
* racial/sectarian abuse
* financial abuse
* emotional/psychological abuse
* sexual abuse/harassment
* physical abuse/violence
* institutional abuse

The fundamental responsibility of Ioi Support is to ensure the welfare and protection of the young person, and that every young person in our service has the right to freedom from abuse. Therefore, our policy is that any staff member who does not possess a valid and current DBS Certificate is never left alone with a young person.

All staff will receive appropriate training at the induction stage in the abuse of a young person. This training will focus on the following elements:

* The types of abuse;
* The source of the abuse, such as:
  + abuse by a third party - unknown.
  + abuse by a third party - a member of staff of the Home.
  + self-inflicted abuse. (For further guidance see the *Self-Harming and Suicidal Behaviour Policy*).
* The handling of suspected and/or alleged abuse, focusing on four key issues:
  + familiarisation with the signs of abuse.
  + providing comfort, support, and reassurance to the young person.
  + establishing a clearly defined reporting procedure for management.
  + ensuring that the young person and family members where appropriate are familiar with the Complaints Procedure, and how to use it.

**Role of Staff**

All staff have a duty of care to our young persons. If a support worker has direct or indirect contact with a young person, they must be able to identify those who might be vulnerable to or at risk of harm or abuse and, following the correct protocols and procedures, act accordingly.

A young person’s protection is paramount in every respect. Employees must always act on the young person's behalf and voice their concerns. This means first knowing how to identify the young persons who are at risk and knowing where to seek advice and support.

**Identifying the signs of abuse**

All staff needs to be aware of the potential signs of young person abuse. Listed below are some common indicators of abuse and neglect:

* Physical signs such as hand-slap marks, bruising in unusual places, bite marks, and bruised eyes.
* Poor physical care/support and inadequate hygiene, inappropriate dress, or failure to seek appropriate health care.
* Unrealistic parental expectations and over-protection of a young person.
* A young person's behaviour may also indicate that they have been abused. For example, if they show fear of certain adults when they approach them, display aggressive behaviour and deliberate self-harm and substance abuse.
* The adult consistently provides inconsistent stories relating to the nature and occurrence of injuries.

For the purposes of this policy, abuse will be classified into the following categories:

* physical injury
* sexual abuse
* emotional abuse
* neglect

**Physical Injury**

Signs and symptoms will include:

* scratches/cuts/bite marks/pinch marks inconsistent with normal play activities
* burns/scalds inconsistent with explanations offered
* bruises in body areas that are not usually harmed through normal play activities
* bruises indicative of slaps, punches, being squeezed or violently shaken
* bruises suggesting the use of straps or sticks
* nervous/fearful watchfulness; fear of physical contact by adults
* unexplained fractures

**Sexual Abuse**

Signs and symptoms will include:

* scratching/soreness/unexplained rashes in the genital areas as reported to staff by a young person
* stained/bloodstained clothing/bedding
* bruises on inner thighs (if visible should a young person be wearing shorts, staff NEVER ask to see injuries or concerns related to potentially sensitive/intimate body areas of a young person)
* discomfort when sitting or walking
* recurrent sexually transmitted infections/disease, repeated pregnancies
* the suggestion of undue sexual awareness through sexualised behaviour or the use of inappropriate words

**Emotional Abuse**

Signs and symptoms will include:

* undue aggression or withdrawal
* constant wetting or soiling of clothing
* poor language development/speech disorders such as stammering or stuttering
* inability to relate to adults and other young people
* Dishonesty
* Behavioural outbursts

**Neglect**

Signs and symptoms will include:

* inappropriate or inadequate clothing
* poor standards of personal hygiene/unwashed, dirty clothing
* constant hunger
* underweight for their age/emaciation
* constant tiredness/listlessness
* untreated medical conditions

**Unknown body marks**

We understand that small marks, grazes, and bruises are a part of normal life, and these will occur naturally through age-appropriate activity/accidental trips or falls. When a mark, bruise, or physical change occurs without an apparent reason, a body map form must be completed, and a report must be made to the Designated Safeguarding Lead (DSL).

The staff team still need to be vigilant of this and be able to monitor, log and report to the DSL, who will then assess the situation and assign a staff member to investigate. Clear, concise recording in the daily log for the young person must take place without delay and a body map and the incident report handed to the DSL.

**Identifying Abusers**

Ioi Support accepts that abuse can be committed by a range of people. It, therefore, accepts its responsibility to protect the people who live in the home from abuse from all sources, which include:

* the staff and management
* visiting health and social care practitioners and other official visitors
* young person's friends and relatives
* people who have contact with young people while they are temporarily outside the premises
* other young people.

**Procedure for Reporting a Serious Incident**

If a young person has a minor injury that is not a cause for suspicion;

* this should be logged on the young person’s individual records by the member of staff who observed these, within 24 hours and the young person should be monitored.

If it is suspected that a young person is the victim of abuse, due to a serious incident or a concerning explanation from the young person;

* Staff are to record the date, time, individuals present and what was said on the safeguarding incident form, including a body map if required. This should be done by the staff member who first spoke to the young person within 6 hours and reported immediately to the DSL.

If a young person discloses abuse to a member of staff or makes an allegation against another member of staff;

* The young person should be listened to, taken seriously, and reassured that coming forward was the correct decision. Then, that member of staff must record the date, time, individuals present and what was said on the safeguarding incident form, including a body map if required. This should be done by the staff member who first spoke to the young person and reported immediately to the DSL. (*see the following section for further guidance*)

If an allegation is made or a concern is raised regarding the DSL, Registered Manager, Service Lead or Director;

* the information should be passed directly to the Local Authority Designated Officer (*see 'Allegations Against a Staff Member' section for contact details*).

If a young person is in immediate danger;

* call emergency services on 999.

DSL gathers information and makes judgement for the next steps. Serious concerns will trigger procedures within service and multi-disciplinary teams when the DSL contacts relevant people with the concerns. Report to the Deputy DSL.

DSL gives feedback to service user and staff and implements steps from the Local Authority. The local Authority and Placing Authority will make decisions and feedback to the service.

**Immediate Actions to be Taken by Staff when a Young Person Discloses Abuse or Neglect**

Staff members should:

* Stay calm
* Listen patiently
* Reassure the young person they are doing the right thing by telling you
* Explain what you are going to do
* Report to the relevant manager
* Write a factual account of what you have seen or happened, immediately.

Staff members should not:

* Appear shocked, horrified, disgusted or angry.
* Make comments or judgments other than to show concern.
* Press the young person for details (unless requested to do so).
* Promise to keep secrets.
* Confront the abuser.
* Risk contaminating evidence.

**Passing information over to the Designated Safeguarding Lead (DSL)**

The correct pro-forma must be completed and sent to the DSL without delay - ideally within an hour of the disclosure. All staff members know that the Local Authority safeguarding team and social worker for young people can be contacted if deemed necessary. Any allegations against staff should be reported to the head of service and DSL if not the same person. If the head of the service has had allegations made against them, staff should contact LADO directly.

The DSL will determine the nature of the actions taken based on the information presented to them and judge whether the issue is one of child protection, adult safeguarding, or a general concern for the home. The DSL must use the correct documentation to record and track the actions taken and outcomes sought. Correspondence, feedback, and outcomes from the Local Authority Designated Officer (LADO) and Safeguarding Adults Board (SAB) must be logged and actioned if actions are required.

Based on the feedback and outcomes from the Local Safeguarding Children Board (LSCB), SAB or LADO, the DSL will collaborate with the staff team to action any required data gathering around the investigation and attend any meetings required. These should be logged on Ioi Support’s **Safeguard Investigation Report**

**Recording Procedures**

In all situations, including those in which the cause for concern arises from a disclosure made in confidence, it is essential that the details of an allegation or reported incident are recorded, regardless of whether or not the concerns are shared with a statutory agency.

As far as possible an accurate note should be made of:

* The full name of the person(s) reporting and to whom it was reported.
* Observations and discussions as they happen.
* Any judgments, actions, and decisions.
* Details of health care/support contacts and any outcomes.
* Results of using a body map to identify specific anatomical areas, marks or injuries.
* The date and time of the incident and disclosure, in chronological order.
* The parties who were/might be involved.

It is not necessary or advisable to seek evidence. By reporting the incident involving the vulnerable young person and carefully logging any information given to you at this stage, you will lay the foundations for an effective formal investigation. Staff should understand the need to preserve and avoid the contamination of evidence if a crime may have been committed.

Records of safeguarding concerns, incidents and actions taken will be confidential. Digital copies will be stored in a password-protected file on the Registered Manager's computer system, and hard copies will be stored in a securely locked cabinet in the administration office. Access to these files will only be shared with individuals who need to know (such as the Registered Person and the young person's advocate or Social Worker) as well as professional agencies in the young person's support network who may benefit from an awareness of this information (such as the Placing Authority and Police).

All referrals made to Social Services or the Police should be confirmed in writing and followed up with a copy of the incident report without delay. Social Services should acknowledge any written referral within one working day of receipt. If no response has been received within three working days, contact Social Services again. Record names, dates and times of subsequent calls, emails and letters made to any Social Services staff to whom concerns have been passed. These procedures not only serve to protect vulnerable young people but also protect employees.

**All Allegations and Suspicions Are to Be Treated Seriously**

The following guidelines should be adhered to:

* Write down the details of the incident.
* Pass this report on to the DSL, Registered Manager, or another senior staff member at the earliest opportunity.
* The DSL or senior staff member should then take appropriate action to ensure the safety of the young person and any other person(s) who may be at risk, and then proceed with investigating the allegation.
* If the matter relates to poor practice, procedures relating to misconduct should be followed. If the matter relates to abuse, the matter should be referred to Social Services, who may involve the Police, and the employee must be suspended pending the outcome of an investigation into the allegations, conducted by Social Services.
* Ioi Support acknowledges that this is an extremely sensitive issue for staff and assures all staff and persons working on its behalf that it will fully support and protect anyone who, in good faith, reports a concern that a colleague is, or might be, abusing vulnerable young people.
* Issues of confidentiality must be clarified early on. Staff must make clear that they will have to discuss the concerns with their supervisor. Staff should under no circumstances guarantee confidentiality to a young person who is making the allegation or disclosure.

**Professional Boundaries Between Staff and Young People**

It is important that staff observe appropriate and professional boundaries in their relationships with young people and others in their support network. We recognise that it is often difficult to draw precise lines defining appropriate behaviour, so we encourage staff to be transparent in their dealings with young people and others and to discuss with managers any difficulties which arise.

The safety of our young people is at the core of our service delivery and any relationship that may jeopardise this will be called into question. Staff may have natural fears that their actions or intentions could be misinterpreted as inappropriate, and accusations could be made as a result. Ioi Support will support all staff who follow company procedures and guidance.

For further information on Ioi Support's guidance and procedures for professional boundaries between staff and young people, see the *Professional Boundaries Policy*.

**Allegations Against Staff**

Allegations against staff can be made where the person who works at Ioi Support has:

* Behaved in a way that has harmed or may have harmed the young person;
* Possibly committed a criminal offence against, or related to, a young person;
* Behaved towards young people in a way that indicates they may pose a risk of harm to young people; or
* Behaved or may have behaved in a way that indicates they may not be suitable to work with young people.

Allegations made against staff will be referred to the Local Authority Designated Officer (LADO).

The LADO will be informed within one working day of all allegations that come to our attention. The LADO is involved from the initial phase of the allegation through to the conclusion of the case. They will provide advice, and guidance and help to determine whether the allegation sits within the scope of the procedures. The LADO will help coordinate information-sharing with the right people and will also monitor and track any investigation, with the aim of resolving it as quickly as possible.

The LADO will provide advice and guidance to employers in relation to making referrals to the Disclosure and Barring Service (DBS) and consult with other agencies in the young person's support network.

Manager/Staff should complete a LADO notification form via the below website address and without delay, e-mail it to the Local Authority Designated Officer (LADO). A telephone call should also be made as it should not be assumed that the email has been received.

* Telephone: 01962 876364
* Email: child.protection@hants.gov.uk
* Website: https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/allegations#step-3

**Allegations of Peer-to-peer Abuse**

Peer-to-peer abuse can involve multiple victims and suspects. All young people must be treated as being at risk. Separation and extra supervision may be required and in situations where significant harm may be a concern, steps to prevent this must be taken by the DSL in line with Ioi Support procedures.

For further guidance on procedures for peer-to-peer abuse, see the *Anti-Bullying Policy*.

**Allegations of Abuse from a Person not Registered or Affiliated with the Service**

Information passed to staff, or concerns that staff have, should be reported to the DSL and the local authority without delay. The placing authority, if different, should be also notified without delay. Staff members who received the initial disclosure should support, record, and pass on the relevant information to the correct people in the correct time frames as per the procedure.

**Support for Those Who Report or Disclose Abuse**

All those making a complaint or allegation or expressing concern, whether they are staff, young people, carers or members of the general public, should be reassured that they will be taken seriously, and their comments will be treated sensitively. Confidentiality however should not be promised, as their concerns may be shared if they or others are at significant risk. In such instances, young people will be given immediate protection from the risk of reprisals or intimidation. If staff, they will be given support and afforded protection, if necessary, in line with the Public Interest Disclosure Act 1998. Ioi Support also guarantees that all documentation will be protected through the Caldicott Principles and adherence to data protection policy and regulations.

**Immediate Concern**

A staff member who witnesses a situation in which a young person is in actual or imminent danger must use their judgment as to the best way to stop what is happening without further risk and/or harm to anyone involved, including themselves, either by immediately intervening personally or by summoning immediate assistance so that the required protection, support or additional care is provided to a young person who may have been harmed.

If it is felt that a young person is in immediate danger, the situation should be immediately reported to the Police on 999. The situation should also be communicated to the Registered Manager – although, in the absence of being able to contact the Registered Manager or if the situation is thought to involve the Registered Manager, Ioi Support’s Senior Management are to be contacted.

If it is felt that there has been a crime, but that it is not an emergency, the situation should be reported to the Police as soon as possible on 101.

Regardless of whether concerns about the possible abuse and/or neglect of a young person constitute a crime or not, unless the young person is in immediate danger, the DSL must alert the local safeguarding unit and follow their procedures and guidance from that point on. If the DSL is unavailable, the next most senior staff member should do this.

**Urgent Medical Attention**

If urgent medical attention is required and there is a suspicion of abuse, the DSL or staff should take the service user directly to A&E without delay at the closest hospital. The local authority and the placing authority should also be informed as soon as possible ideally within an hour time frame after the young person has finished their disclosure. In cases of suspected sexual abuse, the hospital examination should be delayed if possible until the Police have been informed and medical services have consulted with the Police. At all times there must be a responsible adult with the young person if they are under 18. If they are over 18 staff must still be present to support, liaise with services and record outcomes.

When in hospital, Ioi Support will support the young person to understand the situation and if required can source an advocate to support and guide the young person if required.

**Death of a young person**

In the event of the death of a young person, the following must be notified without delay.

* Service lead, Directors, and Registered Manager
* Next of kin and family
* Police
* Local authority
* Placing authority if different
* Health and Safety Executive
* Ofsted

**Reporting Procedures**

**Roles and Responsibilities at Ioi Support**

The Designated Safeguarding Lead (DSL) at Ioi Support is the Registered Manager; Claire Salter

They can be contacted via e-mail Claire.salter@ioisupport.com

The DSL is responsible for the ongoing maintenance and implementation of this policy. The DSL will review this policy every three months in line with our Location Risk Assessment and make any changes necessary in response to changes in Ioi Support's service user base and the home's environment.

**The Role of the Designated Safeguarding Lead**

The role of the DSL is to ensure that this policy is implemented throughout the service and;

* Conduct all necessary child protection/safeguarding-related inquiries, procedures and investigations;
* Ensure secure and confidential record-keeping on safeguarding matters, that a "need to know" confidentiality policy is preserved on such matters and that all staff, volunteers, trainees, and management committee members apply themselves fully to the Data Protection Act 2018 and General Data Protection Regulation (UK-GDPR);
* develop the systems and structures within which it is possible to deliver the best possible support for our young people;
* encourage culture and ethos for the home that eliminates any sort of abuse;
* Consult with social services and the Police in the relevant boroughs on young person protection/safeguarding matters, both formally and informally;
* Report allegations and suspicions of abuse to the appropriate authorities;
* Ensure there are adequate and appropriate induction and training for all staff, volunteers, trainees, and management committee members on safeguarding matters;
* Ensure that all activities conducted by Ioi Support satisfy safeguarding requirements with regard to personnel, practices and premises;
* Check and countersigns all incident reports made by staff making such reference to outside agencies as is appropriate.
* Report on the implementation of safeguarding policies at all Ioi Support management committee meetings.

**Action by the Designated Safeguarding Lead**

After receiving a report of a concern, suspicion or allegation of abuse or harm, Ioi Support's DSL must first take any steps needed to protect the young person from the risk of immediate harm.

The DSL should ensure the following people are notified:

* Social Care Services in the area where the home is located;
* If the suspicion/allegation relates to a member of staff/professional, the manager should ensure the Local Authority Designated Officer (LADO), or their team is notified;
* The Placing Authority and young person's allocated social worker.

The DSL must take steps to ensure that there is no further risk of the victim being abused by the alleged or suspected perpetrator.

The DSL must ensure that the needs of the alleged victim of the abuse for any special or additional care, support, or protection or for checks on health or wellbeing are met at the outset and subsequently throughout the proceedings.

If the alleged abuser is a staff member and there is sufficient evidence that abuse has or might have occurred, the DSL will suspend the person from duty pending the outcome of an investigation. The manager will receive guidance on the steps to be taken following the local safeguarding authority strategy meeting, which will be held following the reporting of the abuse or suspected abuse and the LADO will be notified.

If the evidence is insufficiently strong to warrant suspension, the staff member against whom the allegation has been made will be instructed not to have further unsupervised contact with any young people until the matter is resolved.

**Reporting a Concern About the Registered Manager/DSL/Service Lead/Director**

If the registered manager, DSL, Service Lead or Director is the subject of the concern, the report must be made directly to the LADO using the contact details outlined previously in this policy.

**Referral Procedures**

The decision to refer or not will be made by Registered Manager or Designated Safeguarding Lead.

When considering the decision as to whether to refer elsewhere (e.g. to Police, Social Services, Children's Social care, Disclosure & Barring Service (DBS)) the following will be considered:

* Known indicators of abuse.
* Definitions of abuse.
* Level of risk to the young person.
* The seriousness of the abuse.
* The effect of the abuse on the young person.
* Level of risk to others.
* The effect of the abuse on others.
* Whether or not a criminal offence has been committed.
* Whether or not other statutory obligations have been breached.
* Reporting the abuse or neglect as soon as possible.
* The ability of others (e.g. Police, Social Services) to make a positive contribution to the situation.

**Information Required During Referral**

Information, if known, which will be required when you make a referral or report your concerns:

* Details of the alleged victim – name, address, age, gender, ethnic background including first languages, and details of any disability.
* Details of GP and any known medication.
* If appropriate, advise management on the environment or preferred/advised method when approaching the alleged victim or perpetrator.
* Reasons for concerns, and therefore this referral.
* Details of how these concerns became known.
* Details of the alleged perpetrator.
* Details of abuse and information about suspicions.
* Details of any other background information.
* An impression of how serious the situation might be.
* Any specific information relating to these concerns.
* Details of any other professional involved.
* Details of staff and any significant family members, neighbours, friends, etc.
* Details of any arrangements, which have already been made for the protection of the
* A vulnerable young person or any immediate action is taken.
* Details of anyone else to whom this referral has also been made.

Confirm in writing any information that is given verbally.

**External Contact Information**

The first point of contact at Ioi Support for safeguarding concerns should be the Designated Safeguarding Lead.

If there is an emergency where delay may result in serious harm to a vulnerable young person, or if the abuse may constitute a crime, contact the Police and other necessary emergency services.

Other agencies that can be contacted for support, and will be contacted by the DSL in certain situations, are:

* Local Safeguarding Boards
* Children Social Care
* Social Services
* Registration bodies
* Emergency Social Services

The Local Safeguarding Adults Board can be contacted using the following details:

* Name: Hampshire Adult Safeguarding Board
* Website: [www.hampshiresab.org.uk/keeping-safe/report-concerns](http://www.hampshiresab.org.uk/keeping-safe/report-concerns)
* Telephone: 0300 555 1386
* E-mail: hsab@hants.gov.uk

The Local Safeguarding Children Board can be contacted using the following details:

* Name: Hampshire Safeguarding Children Partnership
* Telephone: 01962 876355
* Email: hscp@hants.gov.uk
* Website: www.hampshirescp.org.uk

Hampshire County Council Multi Agency Safeguarding Hub

* Telephone: 0300 555 1384 during office hours 8.30am to 5pm Monday to Thursday, 8.30am to 4.30pm on Friday
* Out of Hours: 0300 555 1373 at all other times
* Website and IARF to be submitted:

https://forms.hants.gov.uk/en/AchieveForms/?form\_uri=sandbox-publish://AF-Process-7e6115a7-b0ba-484d-991f-084c1248ac72/AF-Stage-52cf8e73-0daf-47d4-bb55-0fdad856d3e6/definition.json&redirectlink=/en&cancelRedirectLink=/en

Nationwide emergency services telephone: 999

**Key Safeguarding Areas**

**E-Safety**

Ioi Support is committed to enabling young people to use digital technologies safely and responsibly. Our e-safety aims are to:

* Recognise the importance of e-safety within the context of every child matters
* Recognise that e-safety is not a technological issue
* Recognise the importance of education, training, and information for all staff on e-safety
* Recognise the need to monitor the impact of the strategy

Ioi Support will:

* Ensure Inappropriate websites are blocked on our own computers and on any handheld devices used by members of staff.
* Ensure that all staff has an up-to-date understanding of digital and emerging technologies used by the young person.
* Block any approaches through social media channels from all young people.
* Provide awareness-raising and education for all staff on the appropriate and safe use of social media and on their digital distribution of personal information.

**What should I do if I have an E-Safety concern?**

If you think a young person is speaking to a stranger online, has been contacted by someone while gaming or is at risk of meeting someone online or being trafficked outside of the UK, you should report this immediately to the DSL. They will take advice from the Child Exploitation and Online Protection Centre and, if appropriate, contact the police and either the Safeguarding Adults Board (SAB) or the Local Safeguarding Children Board (LSCB). If a young person has viewed sexual abuse or violent images of themselves or someone they know, contact the DSL who will notify the police and the SAB/LSCB.

If a young person discloses concern over their online use, they should be referred to the thinkuknow website or the beat bullying website. However, if illegal activities are occurring, including sexting, racial harassment, grooming or threats of harm, this should be reported immediately to the DSL.

For further guidance on Ioi Support's E-Safety principles and measures, see the *E-Safety Policy*.

**Bullying / Abuse Between Peers**

Every young person at Ioi Support has the right to feel confident that the home will provide a safe and supportive environment. Ioi Support and our staff will take every step to make sure that individual young people are not subject to discrimination, marginalisation or bullying from their peers by virtue of their gender, religion, ethnicity, cultural and linguistic background, sexual identity, mental health, disability or for any other reason.

Although it would be near-impossible to fully eradicate bullying from communities, Ioi Support believes that by taking a comprehensive and rounded approach, it is possible to drastically reduce the number of bullying incidents and improve the well-being of young people at the home and in the wider community.

Specifically, the aims of Ioi Support's anti-bullying strategies, policies and intervention systems are:

* To prevent, de-escalate, and/or stop any continuation of bullying;
* To react to bullying incidents in a reasonable, proportionate, and consistent manner;
* To safeguard the young person who has experienced bullying, and to trigger sources of support for them;
* To apply disciplinary sanctions to the young person causing the bullying and ensure they learn from the experience, through multi-agency support.

Ioi Support strives to create an environment in which bullying is not acceptable, not ignored, and dealt with swiftly and constructively. Additionally, we strive to create a climate of openness in which our young people, and staff, are not afraid to confront and deal with issues regarding bullying. Young people at the home should know that they are able to approach any staff with any concerns.

For further guidance on Ioi Support's anti-bullying measures and response procedures, see the *Anti-Bullying Policy*.

**Child Sexual Exploitation**

Child Sexual Exploitation (CSE) is a particularly heinous form of child sexual abuse. It occurs when an individual or group takes advantage of an unequal power dynamic to manipulate or deceive a young person under the age of 18 into sexual activity. It might be in exchange for something the victim needs or wants, and/or for financial or influential gains for the offender. Young people that are the victims of sexual exploitation often do not recognise that they are being exploited.

Ioi Support staff are well positioned to look out for physical or behavioural changes that might indicate involvement in sexual exploitation. Staff must also be vigilant when monitoring online spaces for indications of online grooming.

All practitioners have a responsibility to refer young people under the age of 18 to Children's social care if they suspect a child has suffered, or is likely to suffer, serious harm. Referrals must be made in one of the following ways:

* By contacting the Local Children’s Social Care office.
* In an emergency outside office hours, by contacting the Children’s Social Care Out-of-Hours Service/Emergency Duty Team or the Police.
* All practitioners must confirm verbal and telephone referrals in writing within 48 hours of being made.
* If the child is known to have an allocated social worker, referrals will be made directly to the allocated worker if they are immediately available
* Should the young person be already open to the specialist Hampshire County Council, exploitation, and trafficking team (Willow), staff to also update the allocated worker and telephone duty

The DSL has the responsibility of making referrals. However, if they are not available, the referral must still be made without delay by the next most senior staff member.

For further guidance on Ioi Support's CSE prevention measures and response procedures, see the *Child Sexual Exploitation (CSE) Policy*.

**Child Criminal Exploitation**

The Home Office defines Child Criminal Exploitation (CCE) as *"where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual."*

'County lines' is a form of Child Criminal Exploitation. It is a term used to describe the activities of gangs and organised criminal networks who engage in exporting illegal drugs into one or more importing areas (within the UK), using dedicated mobile phone lines or other forms of "deal line". These gangs are likely to exploit children and vulnerable adults to move (and store) drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

If a staff member identifies that a young person is involved in, or at risk of involvement in CCE, they should report this to the DSL immediately of whom must follow the above procedures as CSE.

For further guidance on Ioi Support's CCE prevention measures and response procedures, see the *Child Criminal Exploitation (CCE) Policy*.

**Gangs and Youth Violence**

A gang can be a peer group, a street gang, or an organised criminal group. The criminal activities conducted by gangs may include the movement of drugs and money across county lines, violent actions, robberies, and public disturbance.

If an Ioi Support staff member has concerns about immediate danger to a young person because of gang activity, they should call the Police on 999. Where there are concerns about a young person being criminally exploited the Police and the Youth Offending Team, from the first point of contact with the young person, should consider whether they are victims of criminal exploitation or trafficking and pursue safeguarding, rather than criminal justice, response.

Any decision not to refer a young person should be actively reviewed to allow a referral to the Youth Offending Team to be made at an appropriate stage to protect the young person's safety.

If a young person is already open to the Willow team, staff should contact the allocated worker and duty.

For further guidance on Ioi Support's procedures regarding Gangs and Organised Crime, see the *Gangs & Youth Violence Policy*.

**Illicit Substances & Substance Abuse**

All reasonable measures must be used to reduce or prevent young people from obtaining drugs or substances which may harm them. If it is known or suspected they are obtaining products that may harm them, whether off the streets, from dealers or traders of any kind, the manager of Ioi Support and social worker must be informed, and a strategy adopted to reduce or prevent it. If the problem persists or is serious, relevant specialists such as the Police will be informed.

If there are immediate risks, which make it impractical to contact the manager or social worker, staff should take what actions are immediately necessary and then inform the manager and social worker(s) at the first opportunity.

When it is discovered that an illicit substance has been brought into the home, or a young person is found in possession of such a substance, this will be immediately confiscated by the most senior member of staff on duty, and the manager will be informed.

The Manager will inform the Social Worker of the Responsible Authority who will advise on the action to be taken. Where this action requires the confiscated substance to be retained as evidence, then the substance will be labelled, signed, dated, and witnessed by the Social Worker and a member of the senior support staff on duty, and stored until needed in the Controlled Drugs cupboard in the Home.

Full details of the substances found, together with a record of the incident, will be recorded in the relevant young person’s case notes.

For further guidance on Ioi Support's safeguarding measures for illicit substances, see the *Illicit Substances Policy*.

**Prevent Duty**

Ioi Support is committed to the UK Government’s policy to reduce the risk of terrorist attacks (known as CONTEST) through its Prevent strategy, particularly in the light of attacks that have cost many lives. It understands that Government policy is based on four main assumptions.

1. Prevent — by stopping people from becoming terrorists or supporting terrorism.
2. Protect — by strengthening borders, infrastructure, and public spaces from any attacks.
3. Prepare — by responding effectively to reduce the impact of any attack.
4. Pursue — to disrupt or stop terrorist attacks.

In respect of anti-radicalisation, Ioi Support will follow local authority policies and guidance for assessing and managing risks, staff training, information sharing and local intervention programmes such as Channel. Ioi Support will also work closely with other community organisations, including the police, who share a common anti-radicalisation agenda.

Ioi Support has a Prevent Single Point of Contact (SPOC) who will take lead responsibility for safeguarding individuals from extremism and radicalisation.

The SPOC at Ioi Support is Claire Salter

For further guidance on Ioi Support's counterterrorism safeguarding measures and the specific duties of our SPOC, see the *Prevent (Counterterrorism) Policy*.

**Human Trafficking and Modern Slavery**

“Trafficking of persons” means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, the abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Young people are usually recruited by coercive or subversive means, taken on dangerous journeys with false papers and ID and, at their destination, they are kept in a controlled environment by means of threats or violence. Some young people may be escorted by a person stating that they are a relative. Most young people are trafficked for financial gains such as domestic servitude, sexual exploitation, benefit fraud, sweat-shop work in catering or agriculture, illegal adoption and many more.

If a staff member has concerns that a young person has been, is, or is at risk of being the victim of human trafficking, they should report this immediately to the Designated Safeguarding Lead.

Concerns can also be reported via the Modern Slavery Helpline confidentially on 08000 121 700. This is open 24 hours a day, 365 days a year.

For further guidance on Ioi Support's identification and prevention of human trafficking measures, see the *Human Trafficking Policy* and the *Modern Slavery Policy.*

**Female Genital Mutilation (FGM)**

The World Health Organisation (WHO) establishes that FGM *“Comprises of all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.”* FGM can also be referred to as Female Circumcision (FC) and Female Genital Cutting (FGC).

It is estimated that around three million girls/women, mostly under the age of 15, undergo the procedure every year, and the WHO estimates that around 200 million girls and women have been subjected to FGM across the world.

If staff at Ioi Support receive any indication that a young person is at immediate risk of FGM, they must urgently notify their manager. The Designated Safeguarding Lead (DSL) will make an immediate referral to the Local Authority's Safeguarding Adults Board (SAB) or, in the case of a young person under 18 years of age, the Multi-Agency Safeguarding and Support Hub (MASSH).

For further guidance on Ioi Support's identification and prevention of FGM, see the *Female Genital Mutilation (FGM) Policy.*

**Forced Marriage**

In a forced marriage, one or both spouses do not consent to the arrangement of the marriage and some elements of duress are involved. Duress can include physical, psychological, financial, sexual, and emotional pressure. Forced marriage is an abuse of human rights and, where a young person is involved, an abuse of the rights of the young person.

Forced marriage is an issue that, but not exclusively, affects females. Up to 15% of victims are male, and most cases involve young women and girls aged 13 to 30.

Any reports or concerns to Ioi Support about forced marriage, including concerns from the victim that they might be subject to such an arrangement, will be treated with the utmost gravity. For any young people under the age of 18, it will be treated as a child protection issue.

If staff have or receive concerns that a young person is or may be the victim of forced marriage, they must report this to the Designated Safeguarding Lead immediately, who will then, if necessary, make a referral to Social Care Services. Social services will then convene a multi-disciplinary strategy meeting to plan the next steps.

For further guidance on Ioi Support's identification and prevention of forced marriage, see the *Forced Marriages Policy*.

**Good Safeguarding Practice**

**Recruitment**

Our recruitment procedures and policies of staff include:

* Enhanced Disclosure & Barring System checks.
* Ensuring that the applicant’s mandatory training is up to date.
* Ensuring that references are obtained, and identities confirmed.
* Risk assessment of role.
* Prospective or current staff member’s duty to declare any existing or subsequent convictions.

Ioi Support takes great care in the recruitment of staff, conducts all possible checks on recruits to ensure that they are of a high standard, and cooperates in all initiatives regarding the sharing of information on support workers who are found to be unsuitable to work with vulnerable people. Ioi Support ensures that new employees are checked through the Disclosure Barring Service (DBS).

For further information on Ioi Support's approach to safe recruitment, see the *Recruitment Policy*and the *Disclosure & Barring Service (DBS) Checks and Referrals Policy.*

**Matching and Referrals**

In line with safeguarding our young people and safer recruitment, we try to match our core staff members based on expertise and experience with the young person. This process is completed prior to the allocation of the main key worker. All admissions are carefully planned to ensure that the process is conducted at a pace appropriate to the needs of the young person being referred, and for the current group of young people living in the home.

Safeguarding concerns from the Local Authority will be considered before a young person is placed in our home.

For further information on Ioi Support's matching and referral process, see the *Matching and Referrals Policy*.

**Surveillance and Monitoring**

To ensure the safety of the young people at Ioi Support, staff, and the local community it may be appropriate to use monitoring systems to support safety and care. The use of any monitoring or surveillance systems will only be used for the purpose of safeguarding and promoting the welfare of the young person or other young people living in the home.

Monitoring systems which may be used include; CCTV.

CCTV will not be in operation in any area within the home and shall only be used at the entrance and exit of the house. This is to give young people their privacy and to ensure they feel entirely comfortable and secure in their own homes.

For further information on Ioi Support's monitoring procedures, see the *CCTV Policy*.

**Safe Spaces**

All young people at Ioi Support will have a safe space within the home, being their own bedroom.

**Young people have their own bedrooms.**

Young people can lock their doors and have their own keys to their rooms

*For further information on Ioi Support's approach to ensuring our young people have their own safe space, see the Arrangements for New Admissions Policy and the Privacy Policy.*

**Use of Physical Intervention**

In exceptional circumstances, a young person may display an episode of challenging behaviour that requires physical intervention to prevent harm or injury to the service user, or to others. The need for possible physical intervention must always be used as a last resort, except where the young person, staff or others are in immediate and serious physical danger. At all times, the least restrictive procedure must be used, with the minimum use of force for the shortest period, and Ioi Support do not permit staff to use any form of physical restraint or intervention, other than that termed “handling” as defined and detailed within the behaviour management and restraining Policy.

**Education and Training**

At Ioi Support we aim to educate not only our staff but our young people, and other support networks on the importance of safeguarding. Our approach to safeguarding does not end at the doors to our home; it involves communication and collaboration with Local Authority Safeguarding Board, the Police, educational services, and community outreach projects that enable us to effectively teach and develop every person that makes up our wider safeguarding picture.

All staff are required to participate in an extensive mandatory training programme as part of their induction including understanding both legislation, policy, and training including but not limited to:

* Behaviour management - The legal framework, understanding aggression, how feelings drive behaviours, de-escalation, personal safety, positive handling, repair, reflection, and review
* CSE, CCE, trafficking and CERAF
* Prevent and Anti-Radicalisation
* ACE’s (Adverse Childhood Experiences)
* E-Safety
* Mental Health
* Bullying
* First Aid
* Substance misuse
* Data Protection
* Adult and Child Safeguarding
* FGM
* Fire Safety
* Equality and Diversity

Training is provided extensively as part of the induction process consisting of both e-learning, in house and external training and workshop opportunities. All staff are provided with an induction book including a training log that will be regularly reviewed within supervision throughout their employment.

Ioi Support recognise the importance of investing in staff learning and development, to optimize the excellence of service provided to our young people.

Training and learning are openly discussed within team meetings, with a culture that is welcoming of staff contribution, sharing ideas on areas that they feel would be beneficial collectively, and it is the Registered Person’s duty to ensure that staff participate and evidence attendance at refresher courses where documented within their learning logs.

**Record Keeping**

The written record  of any  concerns  will be  kept  on  file.  This  confidential  information  will  be  stored securely and appropriately and will be kept for as long as deemed necessary, in line with Data Protection principles and procedures. All incidents should be discussed under supervision with the DSL.

**Confidentiality**

Information in relation to individual safeguarding enquires and cases is confidential, and when information is shared it will be shared on a need-to-know basis that is in line with effective safeguarding practices and supervised by the DSL. Whilst the safety and well-being of the vulnerable young person take precedence over considerations of confidentiality, every effort will be made to maintain confidentiality for everyone concerned, in the event of an allegation and during any subsequent investigation.

Ioi Support has a duty to share information with other agencies and authorities if requested in connection with an assessment of a vulnerable young person or in connection with court proceedings.

When sharing information with a relevant party on an individual the following should be considered;

* Information should be shared on a need-to-know basis when it is in the best interests of the individual;
* Informed consent should be sought and obtained, but if this is not possible and risks are still posed to the young people we support and other adults and young people this may require that requirement to be overridden to maintain safeguarding;
* Distinguishing facts from opinions;
* Ensure the right information about the right people is getting to the correct people in the correct time frames;
* Ensure you are securely sharing information;
* Inform the person who the information is about that it has been shared. Staff must decide with the DSL that this is not going to cause further harm to the person or other persons and must take action and seek advice if required to maintain transparency and manage risk.

The Data Protection Act 2018, General Data Protection Regulation (UK-GDPR), Human Rights Act 1998 and The Children Act 1989 must be considered and if necessary, will override the need to keep the information confidential.

**Related Policies**

* *Allegation Against a Staff Member Policy*
* *Anti-Bullying Policy*
* *Child Criminal Exploitation (CCE) Policy*
* *Child Sexual Exploitation (CSE) Policy*
* *Complaints Policy*
* *Confidentiality Policy*
* *Data Protection Policy*
* *E-Safety Policy*
* *Lone Working Policy*
* *Matching and Referral Process*
* *Missing Young Person Policy*
* *Notification of Serious Events Policy*
* *Professional Boundaries Policy*
* *Recruitment Policy*
* *Self-harming and Suicidal Behaviour Policy*
* *Substance Abuse Policy*
* *Surveillance and Monitoring Policy*
* *Under-Age Sexual Activity Policy*
* *Whistleblowing Policy*

**Other operational pro-forma that you might use to support this document include:**

* *Concerns form*
* *Staff handbook*
* *Safeguarding information for young people*
* *List of key contacts*
* *Risk assessment for service user*
* *LADO referral form*
* *Designated Safeguarding Lead contact form*

**Legislative Framework**

* Human Rights Act (1998)
* The Health and Social Care Act (2008)
* Social Services and Wellbeing Act (2014)
* The Children's Homes (England) Regulations (2015)
* The Children Act (1989)
* Guide to the Children's home regulations including quality standards (DfE 2015)
* Working Together to Safeguard Children; a Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Young People (DfE 2018)
* Keeping Children Safe in Education (2022)
* Child Sexual Exploitation: Guide for Practitioners (DfE 2017)
* The Counter-Terrorism and Security Act (2015)
* Revised Prevent Duty Guidance for England and Wales (Home Office 2021)
* Female Genital Mutilation Act (2003)
* Modern Slavery Act (2015)
* Data Protection Act (2018)
* General Data Protection Regulation (UK-GDPR)

**Monitoring and Review**

The Registered Manager will check this policy is working properly and they will review it as necessary, always following a serious incident and at least once a year. We will make improvements to the policy wherever we can.

Employees are invited to suggest any ways the policy can be improved.

This policy does not form part of any employee’s contract of employment, and it may be amended at any time.

**After reading this Policy, you should be able to:**

* Understand what Safeguarding Young People Policy is and how the Safeguarding Young People Policy operates;
* Understand how Safeguarding Young People Policy operates at Ioi Support and have an awareness of the actions we take in preventing, identifying, and reporting concerns;
* Understand the role you play in the Safeguarding Young People Policy.

If you have not understood any of these points, please ask your Line Manager or staff member responsible for training for further help.

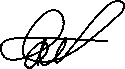
**Policy Review**

A Director will review this policy at least once a year to make any updates needed.

**Authorisation and Signature**

This policy is the authorised version agreed upon by the Directors of Ioi Support.

All employees are expected to follow this policy and failure to do so could result in disciplinary action.



Director’s Signature

Claire Salter

Director