

P63 Safeguarding & Child Protection Policy

TCHC Group Ltd have reviewed this policy in line with COVID-19 requirements and are satisfied that these have been met.

1 SCOPE OF POLICY

TCHC recognises that everyone working for TCHC has a role to play in safeguarding the welfare of young people and vulnerable adults and preventing their abuse. This policy focuses on protection from abuse and neglect and is designed to provide a basic procedure which should be followed.

The aims of this policy are to:

- Provide staff with a framework to promote and safeguard the wellbeing of children, young people, vulnerable adults and staff and ensure that they understand and meet their statutory responsibilities
- Ensure consistent good practice across TCHC

Definitions

The 'Working together to safeguard children 2018' guide defines safeguarding and promoting the welfare of children. It is defined for the purposes of this guidance as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

The 'Care Act 2014' defines safeguarding adults as:

- Protecting adults right to live in safety and live free from abuse and neglect

[Working together to safeguard children](#)

*to access the link above press Ctrl and Enter

[Keeping children safe in education](#)

*to access the link above press Ctrl and Enter

The CHANNEL panel protects vulnerable people from being drawn into terrorism.

[Channel Duty Guidance can be found by clicking this link](#)

*to access the link above press Ctrl and Enter

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Safeguarding Team

Telephone: 01923 698430

Claire Jeens Head of Safeguarding	Cheryl Dozell Deputy Head of Safeguarding (DSL)
Sam Johnson Designated Safeguarding Lead (DSL)	Nicola March Designated Safeguarding Lead (DSL)

DSL	Locations covered
Cheryl Dozell (DSL)	Thurrock, Romford and Clacton GAPS Centres
Sam Johnson (DSL)	Watford and Stansted Offices, Apprenticeships, Ipswich and Bury GAPS Centres
Nikki March (DSL)	Cambridgeshire and Peterborough

2 POLICY STATEMENT

This policy applies to all staff employed by TCHC including temporary and hourly paid, associate staff.

All staff must make sure they familiarise themselves with this safeguarding policy and the procedures that go with it.

All have a legal responsibility to take seriously any concerns about neglect or abuse that come to their attention and to follow the procedures set out below.

Learners who have concerns about other learners or the behaviour of adults towards them can use this policy to ensure they are taken seriously.

We have a duty to act if there is a cause for concern and to notify the appropriate agencies, so that they can investigate and take any necessary action. Any suspicion, allegation or incident of abuse must be reported as soon as possible and in any event within 2 hours to the Safeguarding Team who have responsibility for safeguarding.

The Managing Director is responsible for ensuring:

- That, based on a risk assessment, there is a sufficient number of trained and competent staff with designated responsibility for safeguarding (the "Safeguarding Team")
- A Matrix to include a training programme, is drawn up and implemented
- That relevant information and material is effectively communicated to all staff.

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3 SIGNS AND INDICATORS OF ABUSE AND NEGLECT

Physical Abuse

Physical abuse is where someone deliberately harms someone else. It includes being hit, slapped, pushed, kicked, misuse of medication, restrained, burned and having objects thrown at them.

Sexual Abuse

Sexual abuse is where a vulnerable person has not consented or could not consent or was pressured into consenting, into carrying out sexual acts on someone or having sexual acts performed on them. Including, rape.

Psychological Abuse

Psychological abuse is the ongoing emotional maltreatment of a person. It can seriously damage a person's emotional health and development. Including threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Financial Abuse

This could be limiting access to money or forcing all financial responsibility onto someone else while limiting their ability to provide this. Including theft, fraud, exploitation, making them beg for money, forcing people to commit crimes for money, pressure in connection with wills, property or inheritance of financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect

This is failure to provide care for someone. Including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Discriminatory

Making unfair distinction between different categories of people or things. Including racism, sexism, and ageism.

Abuse caused by poor care or by poor practice

Poor professional practice also needs to be taken into account. This may take the form of isolated incidents of poor or unsatisfactory professional practice, at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other.

In all these incidences it is useful to examine,

- The impact on the victim or others, i.e. has s/he been caused unacceptable distress, pain, loss, a hospital admission or serious trauma.
- The intention of the suspected perpetrator. Was it a genuine mistake or an act of avoidable ignorance?
- The institutionalising pattern of the actions. Repeated incidents of poor care may be an indication of more serious problems and this is sometimes referred to as institutional abuse.

Peer on peer abuse

All staff must have an awareness of safeguarding issues, a number are listed below. Staff should be aware that behaviours can be linked to taking drugs, alcohol abuse, truanting and sexting put children in danger.

Safeguarding issues can become worse via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- gender-based violence
- sexual violence
- sexual harassment
- sexting
- upskirting

Child Protection

The Children, Young Persons and their Families Act, 1989, defines child abuse as “the harming (whether physically, emotionally, sexually), ill-treatment, abuse, neglect, or deprivation of any child or young person”.

TCHC recognises that all staff must act within the legal requirements of the Privacy Act, Children, Young Person’s and their Families Act, Health information Act and other statutes. Information sharing is needed to protect children and enable other people to carry out their legitimate functions. Staff will not share information if they believe that by doing so this will endanger the child.

Staff may be asked to provide information to external agencies such as Child, Youth and Family, the Police, Court or and Psychologists. When any external agency contacts a staff member for information that staff member must first refer to their manager and HR for clearance before providing the information.

Information will be only be provided to the external agency after the staff member has:

- identified the person making the request
- the actual purpose of the request
- what use the information will be put to
- who will see the information?

In the case of a Social Worker for Child wanting to undertake an interview with a child while in the care of TCHC, the staff member must consult their manager and HR to be certain that such an interview will be undertaken legally and in the best interests of the child.

4 SPECIFIC SAFEGUARDING ISSUES

All staff must be aware of the signals that children are at risk from or are involved with serious violent crime.

Advice can be found in the Home Office's [Preventing youth violence and gang involvement](#) and [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#).

[Female Genital Mutilation \(FGM\)](#)

[Forced marriage](#)

[Child sexual exploitation](#)

[Advice to parents and carers on gangs](#)

[Controlling or Coercive behaviour in an intimate or family relationship](#)

[Online Safety Guidance for Educational Settings](#)

[Children missing education](#)

[Preventing bullying](#)

[Domestic abuse: how to get help](#)

[Drugs: advice for schools](#)

[Safeguarding children in whom illness is fabricated or induced](#)

[Hate](#)

[Mental health and behaviour in schools](#)

Online safety

Technology has become a very real and dangerous component of many safeguarding issues. For example, child sexual exploitation; radicalisation; sexual predation.

The three main areas are:

1. **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
2. **contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
3. **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

All staff are responsible for staying safe online and encouraging others to do the same. Teaching staff must embed this within their lessons.

5 INDUCTION AND TRAINING

TCHC will ensure that all staff members receive appropriate safeguarding and child protection training which is regularly updated and in line with advice from Local Safeguarding Children and Adult Board

(LSCB/LSAB) recommendations. Furthermore, all staff members will receive regular safeguarding and child protection updates (for example, via staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children and adults.

All new staff members will take part in safeguarding and child protection training at induction. This will include training on the TCHC's Safeguarding Children, Young People and Vulnerable Adults Policy and the role of the Designated Safeguarding Leads. A copy of this policy and procedures will be provided to new staff at induction, each new staff member signs this off on their induction training checklist. All new staff members will also complete LSCB (or LSCB-approved) child/vulnerable adult protection training within one week of appointment.

All staff members undergo refresher training on safeguarding and child protection throughout their employment with TCHC, at least annually, to keep them up to date with current knowledge to safeguard children (for example, via e-learning and classroom training). Line managers are responsible for going through our safeguarding policy with new members of staff on the first day of their induction and new staff must complete the online safeguarding training modules and assessment on the second day of their induction. Line managers are also responsible for providing their staff with the MyConcern Training Webinar and ensuring that they watch and understand it, to enable staff to report safeguarding concerns.

Safer Recruitment

TCHC's recruitment procedures meet the LSCB/LSAB guidelines for recruiting all staff (paid or unpaid) by obtaining full personal details and CVs with relevance to previous work with children, young people and vulnerable adults. TCHC will always take up two written references and insists that any appointment, where staff have direct and / or unsupervised access to children, young people and vulnerable adults, will only be confirmed subject to a satisfactory Criminal Records Bureau check at the appropriate level. In all other cases, we insist on a disclosure about previous employment history being signed before appointment. At interview we have sound procedures and recording to ensure we are satisfied, and can evidence, that the applicant is appropriate and suitable.

All potential candidates that are interviewed for a post with TCHC, either internally or from outside the organisation, will need to show an understanding of safeguarding that is relevant to the role that they are applying for.

DBS Checks

TCHC has an agreed, consistent approach to DBS checks for all staff who have access to children, young people and vulnerable adults. DBS checks are carried out by TCHC every three years of the staff members employment.

All staff that directly engage with children, young people and vulnerable adults regardless of their position with us must have an enhanced DBS check.

All external visitors to our centres must wear an Identification Badge to identify themselves. They need to sign into the centre and should always be accompanied by a staff member.

6 PROCEDURES

General

TCHC takes seriously its duty of pastoral care and will be proactive in seeking to prevent young persons and vulnerable adults becoming the victims of abuse or neglect. It will do this in several ways:

- Through the creation of an open culture which respects all individual rights and discourages bullying and discrimination of all kinds
- By informing young people of their rights to be free from harm and encouraging them to talk to TCHC staff if they have any concerns
- Through the IAG and Mentoring programmes and an ongoing programme of support, at an appropriate level, to promote self-esteem, social inclusion and address the issue of safeguarding children and young people in the wider context.
- We ask learners throughout their programme if they have any safeguarding concerns. For example, through Induction, IAG, Learner Reviews, Work Placement, Post Induction Surveys, On-Programme Surveys, Exit Surveys and Teaching, Learning and Assessment Plans.

Risk Assessment

It is important when working with children, young people and vulnerable adults that you are in possession of case history and as much background information as you can collect about them. This information will provide you with evidence of whether a formal Risk Assessment is carried out before engaging with that person.

When a Risk Assessment is carried out it must be recorded on the TCHC Risk Assessment Form. It must then follow the procedures outlined on the Risk Assessment and approval gained from HR one week before the activity, so appropriate measures can be put in place before any engagement activity takes place.

Once approval has been granted the centre outlook calendar must be updated to show this activity is taking place, with the risk assessment and off-site register attached. Please invite the Safeguarding Calendar to the event. This can then be monitored by the Safeguarding Team.

Engagement Restrictions

No single member of staff must meet children, young people or vulnerable adults in any kind of risk environment such as the person's home or any non-public closed environments. In these circumstances a Risk Assessment must ALWAYS be taken, and procedures followed to ensure full safeguarding is in place.

No member of staff must invite or accompany any children, young people or vulnerable adults in a private car. There may be extreme circumstances where Gaps centre staff may need to accompany children and young people to a location for example, their home address or hospital. In this case the staff member must contact the safeguarding team to inform them and two members of staff should escort the learner. Where it is not possible for two staff members to escort a learner, a Risk Assessment must be carried out.

Staff may accompany children, young people or vulnerable adults on Trains, Buses, Taxis, Ambulance and other public transport if a Risk Assessment, if appropriate, has been carried out.

Gaps centre staff may accompany children, young people or vulnerable adults by private mini bus if this is the method of transporting learners to a location for Personal Social Development activities as part of the learner's formal education. A Risk Assessment must be carried out and approved for this pre-planned event. The driver must have a valid driving license which permits them to legally drive a mini bus.

All staff must have business use for their car insurance.

Limiting Contact

No member of staff must meet, socialise, fraternise, or make contact with any children, young people or vulnerable adults outside of the normal engagement activity required to provide them with the help and support they have enrolled on to.

TCHC takes a very serious view of anyone breaching this condition and will invoke the Disciplinary Procedure.

If a home visit is undertaken, then two staff members should attend the appointment. Should this not be possible then the single staff member must contact the Safeguarding Team to let them know of their whereabouts.

MyConcern Safeguarding Platform

All staff and associates must ensure that their e-mail preferences are turned on so that notifications, tasks and messages can be received.

What to do if a disclosure is made to you

It is important to remember the following steps when a **disclosure is made to you**.

When working through the process it is recommended that you:

- Remain calm and reassure the person that they have done the right thing by speaking up
- Listen carefully and give the person time to speak
- Explain that only the professionals who need to know will be informed, never promise confidentiality if the learner is at risk of harm or danger
- Act immediately, and do not try to address the issue yourself
- Remember that it is not for you to decide whether a suspicion or claim is true; all instances must be taken seriously

Reporting Process

You must **FIRST** contact our internal safeguarding team by telephone within 2 hours of the incident/disclosure, our internal safeguarding team must be contacted **before** any external agency, unless there is immediate danger to the public.

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- One of the safeguarding team will get back to you by telephone as soon as possible to give advice and support you.
- If for any reason the safeguarding team do not answer the telephone call within the 2 hours, you must contact a member of the senior management team such as a member of The Board. For example, Courtney Grinham and Dominic Wade within the 2 hours.
- You must then report the safeguarding concern through the MyConcern Safeguarding Platform (<https://www.myconcern.education/Account/Login>). Your responsibility does not end at this point because the Designated Safeguarding Lead may wish for you to contact an external agency to make a referral.
- The Designated Safeguarding Lead will then update MyConcern with advice within 24 hours of the safeguarding concern being reported through MyConcern.
- Any further updates to the incident must be reported by adding a safeguarding concern update on MyConcern.

Please note – should you feel your learner, yourself or any members of the public are in immediate danger, report to the police immediately and then contact our internal Safeguarding Team.

Safe Working Practices

All staff must follow personal and professional conduct which includes no unnecessary physical contact with learners. If you see something and feel safe to do so, please address it immediately.

Examples of unnecessary physical contact include but are not limited to:

- Tickling
- Stroking
- Playing with or styling hair
- Removing clothing
- Or any other sexual conduct

Examples of necessary physical contact include but are not limited to:

- Carrying out first aid
- Greeting learners by handshake
- Use of reasonable force to prevent a learner hurting themselves or others

Note: for allegations against a member of staff (including volunteers) – see below.

If the allegation or suspicion of abuse is discovered or disclosed by a learner, the member of staff will then inform a member of the Safeguarding Team as well as the Managing Director.

A member of staff discovering an allegation or suspicion of abuse will, similarly, report it to the Safeguarding Team as well as the Managing Director

The member of staff must then report the safeguarding concern through the MyConcern Safeguarding Platform as above.

HR with the support of the Safeguarding Team will carry out a risk assessment, if one hasn't already been prepared and contact other agencies, if appropriate.

If a learner/staff member has been told about the allegation of abuse in confidence, they should attempt to gain the consent of the learner to make a referral to another agency. However, the gaining of the consent is not essential for information to be passed on. Consideration needs to be given to:

- The scale of the abuse
- The risk of harm to others
- The capacity of the learner to understand the issues of abuse and consent.

In emergency situations (e.g. where there is the risk or occurrence of severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted.

Where a crime is taking place, has just occurred or is suspected, the police must be contacted immediately.

Allegations against a member of staff

Record in full, as soon as possible, the nature of the allegation and any other relevant information. Report the allegation/incident to a member of the Safeguarding Team soon as possible and within 2 hours.

- Ensure the safety of the young person in question and any others who may be at risk.
- Consideration will be given on whether the member of staff should be suspended on full pay pending the investigation.
- The Managing Director will be responsible for any decisions on suspension. Any suspension will follow TCHC procedures.
- The length of any suspension will be in line with TCHC policies and will be as short as is possible while ensuring the safety of the child.

Suspension should not necessarily be an automatic response to an allegation and all allegations should be dealt with quickly, fairly and consistently.

Volunteers

All volunteers for TCHC must always be supervised by a member of staff. Managers are responsible for ensuring that the volunteer has undertaken sufficient safeguarding training before carrying out any role within TCHC. The identity of the volunteer must be checked, and a copy retained by HR.

The term sufficient safeguarding training is defined as:

- Successfully completing safeguarding modules online and providing a certificate to HR and line manager
- Confirmation that they have read and understood our safeguarding policy
- Confirmation that they have read and understood the statutory guidance for KCSiE

Where the volunteer has a current DBS check this must be supplied to HR and their line manager. For cases where the volunteer does not hold a current DBS, the volunteer must obtain this at their own cost, unless otherwise agreed in writing by TCHC.

Any volunteering position is subject to two satisfactory references obtained by HR.

Under no circumstances should a volunteer be left unsupervised and where no checks have been carried out, the volunteer must not carry out any regulated activity. The definition of regulated activity can be found in the most recent KCSiE statutory guidance on the government website.

A risk assessment should be completed once the volunteer has successfully passed their interview where a member of the safeguarding team must be on the panel.

Sub-Contractors

Before we engage with a sub-contractor, we carry out robust due diligence checks including reviewing their safeguarding and prevent policies and procedures. We regularly monitor sub-contractors safeguarding procedures and record any incidents that were investigated.

Appendix 1. Modern Slavery

The Modern slavery awareness booklet from the Home Office published 17 October 2017 states 'Modern Slavery is a serious and often hidden crime in which people are exploited for criminal gain. The impact can be devastating for the victims. Modern slavery comprises slavery, servitude, forced and compulsory labour and human trafficking.'

The UK has legislation, which is designed to tackle slavery and human trafficking, the **Modern Slavery Act 2015**.

Types of modern slavery

- Sexual exploitation
- Domestic servitude
- Criminal exploitation
- Labour exploitation

Victims of modern slavery can be men, women or children. They can be any nationality; the most common nationalities are from:

- Albania
- Vietnam
- UK
- Nigeria
- China
- Romania
- Poland
- Eritrea

- India
- Afghanistan

Indicators of a potential victim may include:

- Distrustful of authorities
- Expression of fear or anxiety
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Perception of being bonded by debt
- Passport or documents held by someone else
- Restriction of movement and confinement to the workplace or to a limited area
- Person forced, intimidated or coerced into providing services
- Substance misuse
- Money is deducted from salary for food or accommodation
- Being placed in a dependency situation
- Inappropriate sexual behaviour
- Limited/sporadic school attendance (under 18s)
- No or limited access to bathroom or hygiene facilities

Please click this link to access for information about modern slavery:

<https://www.gov.uk/government/collections/modern-slavery>

If you are unsure about modern slavery and would like to request training, please contact your Line Manger in the first instance.

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Appendix 2. Information Requests and Sharing with the Police

The police hold important information about children who may be suffering, or likely to suffer, significant harm, as well as those who cause such harm. They should always share this information with other organisations and agencies where this is necessary to protect children. Similarly, they can expect other organisations and agencies to share information to enable the police to carry out their duties. All police forces should have officers trained in child abuse investigation.

Effective sharing of information between TCHC Group staff and local organisations and agencies is essential for early identification of need, assessment and service provision to keep children safe. Serious case reviews have highlighted that missed opportunities to record, understand the significance of and share information in a timely manner can have severe consequences for the safety and welfare of children.

TCHC Group staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children. Whether this is when problems are first emerging, or where a child is already known to local authority children's social care (e.g. they are being supported as a child in need or have a child protection plan).

Information sharing is also essential for the identification of patterns of behaviour when a child has gone missing, when multiple children appear associated to the same context or locations of risk, or in relation to children in the secure estate where there may be multiple local authorities involved in a child's care.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern.

All TCHC Group staff should aim to gain consent to share information but should be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if a practitioner has reason to believe that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. When decisions are made to share information, TCHC Group staff should record who has been given the information and why

TCHC Group staff must have due regard to the relevant data protection principles which allow them to share personal information, as provided for in the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). To share information effectively: all TCHC Group staff should be confident of the processing conditions under the Data Protection Act 2018 and GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'

Where TCHC Group staff need to share special category personal data, they should be aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows TCHC Group staff to share information.

When receiving a request for information from the Police

- All requests for information from the Police should be in writing and should be signed by a serving Police Officer
- First check verification of the Officer who has made the request

- Consult with the Safeguarding Team and let them know exactly what information has been requested and if any reasons given for the request
- Log the request for information including all details such as who has made the request and what has been requested and why on MyConcern
- Check the ID of the officer when they arrive before handing over any information
- Information should be provided in a sealed envelope
- Log when requested information has been provided/picked up and to whom on MyConcern



Courtney Grinham, Managing Director – TCHC GROUP

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