

Key Directions' Policy

Policy Name	Children, Young People and Adults at Risk Safeguarding Policy and Procedure
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Compliance Lead:	Director of Operations

Introduction

Key Directions provides supported accommodation primarily to young people aged 16 to 25 years. For the purpose of this policy when it refers to young person/people this includes vulnerable adults (post 18 years of age) and young people aged 16-18 years of age. Therefore, this policy is relevant to both children and adults. Throughout this policy we will use the term child/young people/adult interchangeably to refer to people aged 16 to 25 years.

1. Policy Aims, Statement and Principles

1.1 Aims

- To provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities;
- To identify children and adults at risk who are suffering or likely to suffer harm or abuse and act to protect them;
- To work with relevant services and agencies to ensure that children and adults at risk are protected from harm;
- To ensure that Key Directions adheres to safer recruitment guidance and legislation, deals promptly with allegations of abuse against staff and takes bullying and harassment seriously;
- To ensure consistent good practice;
- To train staff effectively in all safeguarding issues and in their responsibilities for identifying and protecting children and adults that maybe at risk of harm;
- To maintain a robust recording system for any safeguarding concern and the storage of information;
- To recognise that all children may be vulnerable to abuse, but to be aware that some children and adults at risk may have increased vulnerabilities due to special educational needs or disabilities;

- To demonstrate the commitment of Key Directions with regard to safeguarding and child protection to children, adults at risk, parents, carers and other partners;
- To ensure staff and volunteers adhere to the Key Directions Code of Conduct for Staff which sets out Key Directions' vision, values and culture and how people in Key Directions should behave;
- To ensure that everyone in Key Directions understands the safeguarding procedures and to regularly review policies and procedures to ensure that children, young people and adults at risk are protected to the best of our ability;
- In relation to female genital mutilation (FGM), to work as part of a multi-agency group to support those affected, including social care agencies and the Police;
- To recognise that Peer on Peer abuse may take place, never tolerate or pass this off as 'banter' or 'part of growing up' and otherwise do all things possible to prevent such abuse through education and the use of appropriate sanctions;
- To contribute to Key Directions safeguarding portfolio;
- To provide an environment that is safe and secure; and to teach young people how to keep themselves safe and provide structures for them to raise concerns if they are worried or at risk of harm.

This policy adheres to the following documents:

- Keeping Children Safe in Education (September 2019)
- Working together to Safeguarding Children (June 2018)
- Guidance for Safer Working Practice for those working with Children and Young People in Education Settings (2015)
- What to do if you are worried a child is being abused: advice for practitioners (2015)

There are a number of other documents (statutory and non-statutory) that inform our policy and practice. A list of these can be found in Annex A of Keeping Children Safe in Education (September 2019)

1.2 Statement

Key Directions acknowledges that it has a statutory and moral duty of care to safeguard and promote the welfare of children, young people and adults at risk of harm and is fully committed to ensuring safeguarding practice reflects statutory responsibilities and government guidance.

Throughout the policy and procedures, reference is made to ‘young people’. This term is used to mean everyone who Key Directions works with (16 - 18 years old as well as young adults who are over the age of 18 years of age). Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children’s health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes (Keeping Children Safe in Education. DfE 2019).

Reference is also made to ‘adult at risk’. An adult at risk of harm is a person aged 18 years or over who is, or may be, in need of community care services by reason of mental health or other disability, age or illness and who are unable to take care of themselves or protect themselves against significant harm or exploitation (Care Act 2014). Some young people accessing Key Directions’ services are aged 18 and above and are considered to be “an adult with care and support needs” which is defined in the Care Act 2014 as: a person who has needs for care and support, is experiencing, or is at risk of, abuse, neglect; and, as a result of those care and support needs, is unable to protect themselves from either the risk of or the experience of abuse or neglect. (Care Act 2014).

Key Directions acknowledges that young people with special educational needs and disabilities (SEND) can face additional safeguarding challenges and be particularly vulnerable to abuse and it accepts the responsibility to take reasonable and appropriate steps to ensure their welfare.

Key Directions is committed to maintaining procedures and practices, which safeguard and promote the welfare of all young people and staff by aligning the safeguarding policy to the requirements set out in the appropriate health and social care regulations.

Due to their regular contact with young people accessing Key Directions services, Key Directions staff are uniquely placed to observe changes in behaviour and the outward signs of abuse, neglect, exploitation and radicalisation. Young people or adults at risk may also turn to a trusted adult within Key Directions when they are in distress or at risk. It is vital that all staff are alert to the signs of abuse, are approachable and trusted by young people, listen actively to young people and understand the procedures for reporting their concerns. Key Directions will act on identified concerns and will provide early help to prevent concerns from escalating.

1.3 Principles

The responsibility to safeguard and promote the welfare of its young people is of paramount importance to Key Directions.

All young people under the 9 protected characteristics of the Equality Act 2010, have equal rights to protection.

All staff have responsibility to provide a safe environment in which young people and adults at risk can live.

Key Directions is committed to safeguarding and promoting the welfare of young people and adults at risk and expects all staff and volunteers to share this commitment.

All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a young person or adult at risk of harm at home, in the community or within Key Directions.

All Key Directions staff understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to young people and adults at risk.

All Key Directions staff should be prepared to identify young people who may benefit from early help by providing support as soon as a problem emerges and ensuring risk assessments are in place for all young people deemed at risk.

Any staff member who has a concern that there is a risk of immediate serious harm to a young person or adult at risk must instantly work with the Designated Safeguarding Lead to ensure a referral will be made immediately to Children's or Adult Social Care at the relevant Local Authority.

All staff must ensure that detailed accurate records of all safeguarding concerns are logged and maintained on the Safeguarding form and sent to the Designated Safeguarding Lead. All records and paper based information will be securely stored. Young people, adults and staff involved in safeguarding concerns will receive appropriate support.

This policy will be reviewed annually unless an incident; new legislation or guidance suggests the need for an interim review.

All volunteers, contractors, stakeholders, partners working with, or for, Key Directions will be required to operate within the ethos and parameters of the safeguarding policy and its procedures.

Failure to comply with the safeguarding policy and procedures will be addressed without delay through the staff disciplinary policy and procedure.

The Senior Leadership Team will ratify and ensure that Key Directions has a safeguarding policy and procedure in place.

This policy is available on Key Directions' website and all staff and volunteers are required to read it and provide confirmation that they also understand the contents of the policy and procedure in writing before commencing work with Key Directions. Please see appendix A which must be completed in full and submitted to the Department of Human Resources.

1.4 Scope

This policy applies to:

All staff and volunteers working in or on behalf of Key Directions. All references in this document to 'staff or members of staff' should be interpreted as relating to the aforementioned unless otherwise stated.

All Key Directions services and provisions and any other subsidiary that may be acquired in the future.

2. Roles and Responsibilities

Designated staff with responsibility for safeguarding:

Chief Executive Officer
Managing Director
Chief Operating Officer
Service Manager

For contact details please see appendix B

2.1 Designated Safeguarding Leads

Each Regional Office or 'Hub' operated by Key Directions has its own Designated Safeguarding Lead (DSL) and at least one Designated Safeguarding Deputy. Names and contact arrangements for the DSL and DSDs of all Key Directions' regional offices are set out above, together with links to the Local Children and Adult Safeguarding Boards of the area where the provision is located. This policy is aligned to the safeguarding policies of those Local Children and Adult Safeguarding Boards.

2.2 Designated Safeguarding Leads (DSL) responsibilities

Each nominated Designated Safeguarding Lead:

- Has the status and authority within Key Directions to carry out the duties of the post, including committing resources and supporting and directing other staff;
- Takes lead responsibility for safeguarding and child protection across their respective region and will only delegate any activities of the DSL to appropriately trained deputies. The role and responsibilities is explicit in the role holder's job description;

- Is appropriately trained, receives refresher training at two-yearly intervals and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role;
- Is alert to the specific needs of young people and adults at risk, those with special educational needs, looked after young people and young carers;
- Has an understanding of the Common Assessment Framework process to ensure effective assessment and understanding of young people's additional needs in order to inform appropriate provision of early help and intervention;
- Has an understanding of the early help process to ensure effective assessment and understanding of young people's additional needs;
- Has a working knowledge of relevant national guidance in respect of all specific safeguarding issues and ensures that all staff within their region receive necessary the training, information and guidance;
- Makes referrals to the Channel programme where there is a radicalisation concern and or supports any staff who make a referral to Channel;
- Supports their region with regards to Key Directions' responsibilities under the Prevent duty and provides advice and support on protecting children and adults at risk from radicalisation;
- Refers cases of suspected abuse to Social Care and/or the Police, as appropriate;
- Is available during office hours for staff to discuss any safeguarding concerns or otherwise ensures that a deputy will be available;
- Ensures that Key Directions holds more than one emergency contact number for every young person (where practically possible);
- Ensures all staff within their region have read and understood Working Together to Safeguard Children 2019;
- Ensures that all staff within their region sign to indicate that they have read and understood the Young People and Adults at Risk Safeguarding Policy and the Key Directions' Code of Conduct for Staff;
- Updates their knowledge and skills regularly and keep up with developments to their role;
- Provides staff across Key Directions with the knowledge, skills and support required to safeguarding children and adults at risk;

- Refers cases where a person is dismissed or has left Key Directions due to risk/harm to a young person to the Disclosure and Barring Service, as required;
- Takes responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- Keeps a record of staff attendance at safeguarding training;
- Makes the Young People and Adults at Risk Safeguarding Policy available publically, i.e., on the Key Directions' website or by other means;
- Notifies Children or Adult Social care if a young person with a child protection plan or an adult has a sustained period of absence without explanation;
- Attends or ensures an appropriate representative attends any multi- agency safeguarding or child protection meeting;
- Develops effective links with relevant statutory and voluntary agencies including the local safeguarding partnerships;
- Ensures that, when a young person leaves Key Directions, all safeguarding records are passed to the new provision where applicable and appropriate under GDPR and Safeguarding and obtains confirmation of receipt. If the young person or adult at risk is the subject of an open case to Children's or Adult Social Care, their social worker is also informed;
- Works closely with other relevant professionals (e.g. SENCO, Virtual School Head, Social Worker, Health Professionals and other multi-agency professionals involved) to ensure young people and adults at risk with additional vulnerabilities are safeguarded;
- Ensures that staff are supported in recognition of the stressful and traumatic nature of safeguarding;
- Promotes a 'culture of safeguarding' in which every member of Key Directions acts in the best interest of the young person;
- Meets regularly with the safeguarding board for Key Directions to review safeguarding policies and procedures across Key Directions and evaluate safeguarding training;
- Provides an annual report to the Senior Leadership Team setting out how Key Directions has discharged its safeguarding duties;

- Ensures that staff are made aware of and follow ‘Working to Safeguard Children 2019’ and of their obligation to refer all allegations that a young person has been harmed or that a young person may be at risk of harm from a member of staff or volunteer to the Designated Officer in the Local Authority within one working day prior to any internal investigation; and
- Ensures that the ‘Young People and Adults at Risk safeguarding’ policy and procedures are regularly reviewed and updated annually.

2.3 Deputy Designated Safeguarding Lead (DDSL) responsibility

Every Deputy Designated Safeguarding Lead is appropriately trained to the same level as the Designated Safeguarding Lead and, in the absence of the Designated Safeguarding Lead, carries out those functions necessary to ensure the ongoing safety and protection of young people. In the event of the long-term absence of the Designated Safeguarding Lead, one Deputy will be nominated as acting DSL and will assume all of the functions as detailed at 2.2 above.

The DSL or a DDSL will generally be expected to be available in person but in exceptional circumstances availability will be via telephone.

2.4 Director Responsibilities

The Board of Directors Key Directions are aware of and adhere to the guidance issued by the Children’s Homes Regulations, Ofsted and CQC. Despite supported accommodation not currently being a regulated service Key Directions promises to adhere to the regulations and requirements set out by Ofsted and CQC. Key Directions will:

1. Ensure it has an adequate safeguarding policy, code of conduct and other safeguarding procedures which are regularly reviewed and updated to ensure that they are fit for purpose;
2. Identify possible risks, including risks to young people using Key Direction’s provisions/services or anyone else connected to Key Directions and any emerging risks on the horizon;
3. Consider how to develop and embed the safeguarding culture within Key Directions;
4. Ensure that everyone involved working/volunteering/involved with Key Directions knows how to recognise, respond to, report and record a safeguarding concern;
5. Ensure all staff know how to raise a safeguarding concern;
6. Regularly evaluate any safeguarding training provided, ensuring it is current and relevant;
7. Review which posts within Key Directions can and must have an enhanced DBS check from the Disclosure and Barring Service;

8. Has a risk assessment process in place for job posts which do not qualify for a DBS check, but which still have contact with young people or adults at risk;
9. Periodically review Key Directions safeguarding policy and procedures, learning from any serious incident or 'near miss'; and
10. Ensure that all appropriate checks and due diligence is carried out in any different geographical areas of operation.

The Board of Directors of Key Directions takes special responsibility for monitoring safeguarding across Key Directions to ensure that Key Directions:

- Appoints DSLs across all Key Directions' regions who are senior managers in each region and who have undertaken training in inter-agency working, in addition to basic safeguarding training;
- Ensures that the DSL role is explicit in the role holder's job description and that safeguarding responsibilities are identified explicitly in the job/role descriptions of all staff and volunteers;
- Ensures that the DSL or a DDSL is always available during normal working hours for staff to discuss any safeguarding concerns;
- Ensures that the DSL or a DDSL is always available at least via telephone or other media during any out of hours;
- Has a safeguarding policy and procedures, including a staff code of conduct, that are consistent with statutory requirements. These are reviewed annually and the safeguarding policy and procedures are available publicly on the Key Directions' website or by other means and the staff code of conduct available by request.
- Has procedures for dealing with allegations of abuse made against members of staff and volunteers, including allegations made against a senior manager or Board member or Peer on Peer and allegations against other young people;
- Follows safer recruitment procedures that include statutory checks on the suitability of staff to work with young people and adults at risk;
- Develops an induction strategy that ensures all staff, including the Board of Directors, all staff and volunteers receive information about their relevant provision's safeguarding arrangements, Key Directions' Code of Conduct for Staff and the role of the DSL on induction;

- Develops a training strategy that ensures all staff, including the Board of Directors, all staff and volunteers receive appropriate and regularly updated safeguarding training and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard effectively and this training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above;
- Ensures that all staff, including temporary staff and volunteers, are provided with, and sign, copies of or access to the Young People and Adults at Risk Safeguarding Policy and Key Directions' Code of Conduct for Staff before they start work at Key Directions;
- Appoints a designated lead(s) to support the educational achievement of young people who are looked after by the Local Authority;
- Teaches young people about safeguarding and how to keep themselves safe at all times, including when online;
- Reports and/or refers all incidents or allegations appropriately, including where relevant, sending a serious incident report to the host and placing local authority.
- The nominated Director for Safeguarding will liaise with relevant external authorities should an allegation be made about any of the Directors or a DSL/DDSL.
- An annual report on safeguarding will be written and presented to the Board of Directors for review.

2.5 Board of Directors' Responsibilities

The Board of Directors are responsible for safeguarding in Key Directions. They are responsible for ensuring safeguarding is embedded in all areas of the company and that the whole company has a culture where safeguarding is paramount.

Safeguarding will be discussed as an agenda point at each Board meeting.

The Board of Directors have responsibility for safeguarding and Prevent across the company, providing strategic leadership and ensuring collaborative working practice and quality. This includes ensuring that all statutory regulations and performance requirements relating to safeguarding and Prevent are fully met and agreed at Board level.

2.6 Manager responsibilities (or in the absence of the Board of Directors)

- Ensures that the Young People and Adults at Risk Safeguarding Policy and procedures are understood and implemented by all staff at their provision;

- Allocates sufficient time, training, support and resources, including cover arrangements when necessary to enable the DSL and deputies to carry out their roles effectively, including the assessment of children, young people and adults at risk and attendance at strategy discussions and other necessary meetings;
- Supports staff to promote the educational achievement of any young people who is looked after by the Local authority and have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside of England and Wales;
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures;
- Ensures that young people are provided with opportunities to learn about safeguarding and how to keep themselves safe at all times, including when online;
- Ensures that anyone who has harmed or may pose a risk of harm is referred to the Disclosure and Barring Service, as advised by the LADO;
- Appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers;
- Where applicable safeguards children's, young people's and adults at risk wellbeing;
- Ensures close and effective partnership working with Local Authority Safeguarding and Social Care teams, Care Quality Commission or the Care and Social Services Inspectorate Wales and Police (if appropriate);
- Ensures that young people and adults social care have access to Key Directions' code of conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2019);
- Ensure that all recruitment follows the 'Safer Recruitment' guidance and a central record is maintained with details of all members of staff who are in contact with young people; and
- Respond to allegations of abuse against all other members of staff.

2.7 Role and Responsibilities of all staff

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for children and adults at risk. All staff across Key Directions:

- Have a responsibility to provide a safe environment, where young people and adults can live;

- Should know what to do if a young person tells them that s/he is being abused or neglected;
- Will be able to identify indicators of abuse;
- Will be made aware of: Young People and Adults at Risk Safeguarding Policy, behaviour policy; the Key Directions' Code of Conduct for Staff; information about the safeguarding response to children missing from home or care; the role of the designated lead and all systems within Key Directions that support safeguarding;
- Will be provided with a copy of Working Together to Safeguard Children (most recent version) annually and receive annually updated training on their safeguarding roles and responsibilities;
- Should know what to do if a young person makes a disclosure of abuse and never promise confidentiality when a disclosure is made;
- Will be made aware of the early help process and understand their role in it;
- Should be prepared to identify young people who may benefit from early help and will discuss early help requirements with the safeguarding lead in the first instance;
- May be required to support social workers and other agencies following a referral;
- Will be made aware of the process for making referrals to Children and Adults Social Care, understand statutory assessments and the role that they may be expected to play in such assessments;
- Should be prepared to make referrals if they have concerns about a child or adult at risk's welfare and understand the role that they may be expected to play in such assessments;
- Will receive regularly updated safeguarding and Prevent training;
- Will receive safeguarding updates throughout the year as part of continuous professional development;
- Should be able to contribute to the development of Young People and Adults at Risk Safeguarding Policy and practice;
- Should always seek advice from the DSL if they are unsure and record actions on Key Directions' Incident form;

3. Recognising Abuse

To ensure that all young people are protected from harm, Key Directions needs to understand what types of behaviour constitute abuse and neglect. Abuse may be committed by adult men or women and by other young people. Key Directions recognises that abuse can take many different forms. Staff will receive training on the following issues and action will be taken if Key Directions believe that a young person is at risk.

Abuse is a form of maltreatment of a child or adult at risk. Somebody may abuse or neglect a child or adult at risk by inflicting harm or by failing to act to prevent harm. Children or adults at risk may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

3.1 Types of abuse:

- **Physical abuse:** a form of abuse which involves hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or adult at risk.
- **Induced or fabricated illness (IFI):** caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or adult at risk. This used to be called Munchausen's syndrome by proxy, but is now usually referred to as induced or fabricated illness (IFI).
- **Emotional/psychological abuse:** the persistent emotional maltreatment of a child or adult at risk such as to cause severe and adverse effects on the children's, young person's or adult at risk emotional development. It may involve conveying to the young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations. These may include interactions beyond their development capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing the young person to frequently feel frightened or in danger, or the exploitation or corruption of the young person. Some level of emotional abuse is involved in all types of maltreatment of a young person, although it may occur alone.

- **Sexual abuse:** involves forcing or enticing a child, young person or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non- penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
- **Neglect:** this is the persistent failure to meet a young person’s basic physical and/or psychological needs, likely to result in the serious impairment of the young person’s health or development. Neglect may occur during pregnancy as a result of a maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a young person from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a young person’s basic emotional needs.
- **Self-Neglect:** Self-neglect is a behavioural condition in which an individual neglects to attend to their basic needs, such as personal hygiene, appropriate clothing, feeding, or tending appropriately to any medical conditions they have.
- **Female Genital Mutilation (FGM):** is any procedure which involves partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons.
- **Breast ironing:** also known as breast flattening, is the pounding and massaging of a pubescent girl’s breasts, using hard or heated objects to try and make them stop developing or disappear. The reason often given for this is that adults are trying to protect the young female from risk of sexual abuse, harassment or rape. This has significant psychological impact on the individual.
- **Honour based violence:** is a crime or incident, which may have been committed to defend or protect the honour of a family or community.
- **Faith Based Abuse:** psychological manipulation and harm inflicted on a person by using the teachings of their religion. This is perpetrated by members of the same or similar faith and includes position of authority within the religion.

- **Modern Slavery:** Modern slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Trafficking is a type of abuse where children or adults at risk are recruited, moved or transported and then exploited, forced to work or sold. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Forced Marriage:** Where one or both people do not consent to the marriage and pressure or abuse is used.
- **Child sexual exploitation:** Child sexual exploitation is a type of sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
- **Online abuse:** This is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones.
- **Non-recent abuse:** Non-recent abuse, sometimes called historical abuse, is when an adult was abused as a child or young person under the age of 18. Sometimes adults who were abused in childhood blame themselves or are made to feel it's their fault. But this is never the case: there's no excuse for abuse.
- **Peer on Peer abuse:** this is most likely to include, but may not be limited to, bullying (including cyberbullying), sexual violence & sexual harassment, upskirting, gender based violence/sexual assaults, sexting, teen partner abuse, initiation/hazing type violence/rituals.
- **Bullying and cyberbullying:** Bullying can happen anywhere - at school, at home or online. It's usually repeated over a long period of time and can hurt a child or adult at risk both physically and emotionally.
- **Domestic abuse:** Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships.
- **County Lines / Criminal Exploitation:** As set out in the 'Serious Violence Strategy' published by the Home Office in 2018, this is a term used to describe gangs and organized criminal networks involved in exporting illegal drugs within the UK using dedicated mobile phone lines or other forms of communication. They are likely to exploit children and adults at risk to move and store drugs and money, they will often use coercion, intimidation, violence (including sexual violence and weapons).

- **Grooming:** Children and adults at risk can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional.
- **Upskirting:** typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- **Harmful sexual behaviour:** Children and adults at risk who develop harmful sexual behaviour harm themselves and others.
- **Gang or youth violence:** an organisation that claims control over territory in a community and engages, either individually or collectively in illegal and possibly violent behaviour.
- **Radicalisation:** a vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
- **Financial Abuse:** Which includes taking another person's money or possessions - for example, having money or property stolen, being pressured into giving people money or changing a will, misuse of benefits, not being allowed access to money.
- **Coercive control, controlling behaviour & psychological abuse:**
Psychological abuse is common, but too few people understand the definition of this well enough to spot it at an early stage and therefore prevent this from becoming worse. Without the visible signs of physical abuse, psychological abuse can stay hidden for years.

Psychological abuse may start small at first and build into something that can be frightening and threatening - signs and symptoms include:

- exclusion from meaningful events or activities
- ignoring, imitating or mocking the person
- insulting or isolating the person
- name calling
- swearing or yelling
- threatening the person or threatening to take away something that is important.

It is important to remember that any of these examples of psychological abuse can happen to anyone, no matter what their gender, age or circumstance.

Coercive control is a pattern of behaviour which seeks to undermine a person's self-esteem or sense of self and restrict or remove their liberty or freedom. It describes a variety of controlling acts including manipulation, intimidation, sexual coercion, gaslighting (a form of psychological abuse in which a victim is manipulated into doubting their own memory and sanity).

[Section 76 of the Serious Crime Act 2015](#) created a new offence of controlling or coercive behaviour. The offence carries a maximum penalty of five years'

imprisonment and a fine. The legislation closes a gap around patterns of coercive and controlling behaviour in relationships between:

- intimate partners
- former partners who still live together
- family members.

This does not relate to a single incident. It is a pattern of behaviour that takes place over time, in order for one person to exert power, control or coercion over another. The perpetrator knows, or ought to know, that the behaviour will have a serious effect on the victim

- **Discriminating abuse:** Discriminating abuse includes any type of abuse aimed at a child or adult at risk because of their colour, religion, appearance or sexuality. For example, ignoring spiritual or religious beliefs, comments or jokes about a person's disability, age, race, sexual orientation, or gender / gender identity, ignoring cultural needs, for example diet or clothing.
- **Organisational abuse:** Not offering flexibility and choice for young people, having poor standards of care, lack of inadequate procedures. Poor record keeping or lack of management overview and support. Insufficient staffing, abusive or disrespectful attitudes towards young people, not offering choice or promoting independence, misuse of medication. Failure to respond to abuse properly.
- **Abuse of Individual Rights/ discriminatory abuse/ racial abuse:** Abuse of individual rights is a violation of human and civil rights by any other person or persons. Discriminatory abuse consists of abusive or derisive attitudes or behaviour based on a person's sex, sexuality, ethnic origin, race, culture, age, disability or any other discriminatory abuse - this includes hate crime. Forced marriage is also an abuse of human rights and falls within the definition of adult abuse.

Key Directions will also take action to protect:

- Young people missing education; and
- Young people missing from home or care.

3.2 Early Help and use of Early Help Assessment Process

Key Directions recognises that providing early help is more effective in promoting the welfare of young people than reacting later. Early help means providing support as soon as a problem emerges, at any point in a young person's life. All staff should be aware of the early help process and understand their role in it. All staff are, therefore, trained and required to notice any concerns about young people which may help to identify that they would benefit from early help; to record these concerns through Key Directions' incident recording procedures; and share their concerns with the Designated Safeguarding Lead (or a DDSL). Key Directions works closely with all relevant

professionals and multi-agency groups to improve outcomes for young people.

4. Procedure for reporting Concerns about a young person

4.1 Five 'R's model

Key Directions will adopt the five R's model for dealing with concerns or disclosures regarding any child, young person or adult at risk. These are: Recognise, Respond, Record, Report, Refer.

4.1.1 Recognise

A young person may disclose sensitive information at any time of the day or night. It is, therefore, imperative that all staff are aware of the signs and behaviours which may indicate abuse. All staff will be alert to indicators of abuse and will report any of the following to the Designated Safeguarding Lead immediately.

4.1.2 Respond

When receiving a disclosure from a young person the member of staff must:

- Find time and, if necessary, a suitable place to listen to the child, young person or adult at risk when a disclosure is reported.
- Listen to what is being said without displaying shock or disbelief.
- Not make false promises which may not be fulfilled and not promise confidentiality.
- If the young person asks that information is kept secret, it is important that the young person is informed, in a manner appropriate to their age/stage in development, that complete confidentiality cannot be promised.

4.1.3 Record

Records that are factual, accurate and relevant and avoid subjective judgements should be written and kept using Key Directions incident recording and reporting system. It is not the responsibility of Key Directions to 'check out' what any young person tells, nor should any abuser be questioned. All concerns for young people should be recorded as soon as possible and within one hour using the incident recording system. At no time should an individual member of staff consider taking photographic evidence of any injuries or marks to a young person, this type of behaviour could lead to the staff member being taken into managing allegations procedures.

4.1.4 Report

The member of staff who has recorded the concern, or received the disclosure, must report the concern/disclosure to the DSL, or in their absence, a DDSL, immediately by

completing the incident form and sending to them securely. If a disclosure is made out of office hours then the “On-call” system should be used. The duty member of the on call team should be notified immediately. The member of staff who is on call will advise of any immediate action to be taken and then inform the DSL of any actions taken at the earliest opportunity during the next working day.

4.1.5 Refer

When the DSL, or in their absence a DDSL, has been informed, they will make the decision whether or not to refer the concern to social care or the Police.

For referrals concerning young people under 18 years of age, the DSL should use the Local Authority ‘Children’s Social Care threshold guidelines. If in doubt, the receiving team will determine whether a safeguarding enquiry is needed or if not, what other measures may need to be taken.

The initial contact service will be consulted when there is uncertainty about whether to refer. Referrals must be made as soon as possible and the appropriate forms completed and sent.

All referrals to external agencies should be followed up by Key Directions within 24 hours until a written response is received.

Dependent on which Local Authority a referral is made to a different process may need to be followed for Key Directions. If the disclosure/concern is related to events happening at Key Directions the DSL should follow its local guidance. If the disclosure/concern relates to events happening outside a Key Directions service, the DSL should refer the concern to the Police and local authority safeguarding team.

4.2 Submitting referrals

All referrals relating to young people under 18 should be made to the Local Authority Children’s team / MASH.

All referrals relating to adults at risk should be made to the Local Authority Safeguarding Adults Team.

4.3 Staff reporting directly to external agencies

Staff should ordinarily follow the reporting procedures outlined in this policy. However, as emphasised in extenuating circumstances any staff member can refer their concerns directly to Children’s / Adults Social Care and/or the Police if:

- the situation is an emergency and the DSL, the DDSL, On call manager, member of the Board is unavailable;
- they are convinced that a direct report is the only way to ensure the young person’s safety; or

- for any other reason they make a judgement that a direct referral is in the best interests of the young person.

In any of those circumstances, staff may make direct referrals and share information without being the subject of censure or disciplinary action. However, staff should inform the DSL at the earliest opportunity that they have done so unless in their judgement doing so would increase the risk of harm to the young person or adult at risk.

4.4 Position of trust

All adults working with young people and adults at risk of harm are in a position of trust in relation to these young people. A relationship between a member of staff, volunteer or contractor and a young person cannot be a relationship between equals. There is potential for exploitation and harm of the young person, and all staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a young person under 18 may be a criminal offence, even if that young person is over the age of consent.

The Key Directions' Code of Conduct for Staff sets out the expectations of staff and is signed by all staff members. It would also be a breach of the Code of Conduct for any member of staff to have any form of sexual relationship with any person accessing services provided by Key Directions.

5 Procedure for Reporting Concerns about Staff, Volunteers or Visitors

5.1 Whistleblowing

All staff and volunteers are able to raise concerns about poor or unsafe practice and potential failures in the safeguarding regime and concerns will be taken seriously.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff conduct policies, are in place for such concerns to be raised. Further information and guidance is available in Key Directions' 'Whistleblowing Policy'.

Staff are expected to report all concerns about poor practice or possible abuse by colleagues to the DSL; to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protect young people and adults at risk and reduces the risk of serious abuse in Key Directions. Concerns or complaints about a senior manager should be reported to a member of the Board of Directors. Staff may also report concerns about suspected abuse or neglect directly to Children's /Adults Social Care or the Police if they believe direct reporting is necessary to secure action. The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m. Monday to Friday or email: help@nspcc.org.uk.

5.2 Allegations against staff

When an allegation is made against a member of staff, they have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Where a member of staff or volunteer feels that there are poor or unsafe practice and potential failures in the company then they should raise them with their line manager. If, however, they feel that their concerns have not been addressed then they should raise them with the Board of Directors who have responsibility for safeguarding and utilise Key Directions' Whistleblowing policy.

A member of staff who receives an allegation about another member of staff from a young person or adult at risk of harm will follow the guidelines in section 4 for dealing with disclosure.

Allegations against a staff member will be assessed by the DSL and Human Resources. In order to assess the allegations against a member of staff, it will be judged against the relevant criteria highlighted below. This applies to all cases in which it is alleged that an individual who works or volunteers with young people or adults at risk of harm has:

- Behaved in a way that has harmed a young person or may have harmed a child or adult at risk;
- Possibly committed a criminal offence against or related to a young person;
- Or behaved towards a young person in a way that indicates they may pose a risk of harm to young people or an adult at risk.

The DSL will inform the LADO within 1 working day (if it is over a weekend then the expectation is it done by end of play on the next working day) of receiving the allegation with support from human resources where required, if the case meets the relevant criteria. Where the cases may not appear to meet the relevant criteria fully but still gives rise to concerns about the risk an individual poses to young people through their work, Key Directions will seek advice from the (LADO), or appropriate safeguarding team, for the most appropriate course of action. Suspension of a member of staff is a neutral act and is not the default option; alternatives to suspension will always be considered. In some cases, however, a member of staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, Key Directions will provide support and a named contact for the member of staff.

Allegations made against a senior member of staff should be reported to either the CEO, COO or MD and utilise Key Directions' Whistleblowing policy. Allegations made against the Board of Directors (CEO, COO, MD) should be made directly to the LADO. Where false allegations or allegations without foundation are found the case manager/ investigating officer with support from Human Resources if required will:-

- Prepare a report outlining the allegations and giving the reasons for the conclusion that it had no foundation;

- Inform the member of staff about whom the allegation was made both orally and in writing that no further action will be taken; and
- Reassure the member of staff of Key Direction's understanding of the personal impact that false allegations may have and the support Key Directions will continue to offer.

Documents relating to an investigation will be retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details will be retained on the member of staff's file and stored in accordance with the Disciplinary Policy & Procedure.

Staff, parents/carers, stakeholders, young people and Directors are reminded that publication of material that may lead to the identification of a staff member who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites. In accordance with best practice and legislation Key Directions will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

6. Assessing Risk

Individual risk assessments for young people are held on each individual young person's file providing information to support the management of risk in supporting the young person whilst receiving services from Key Directions. The aim is to ensure that the balance of risk against achieving progression remains central to the work of Key Directions, supporting young people to become less vulnerable, more skilled and increasingly independent within the community. Through admissions and continuous individual young people's risk assessments Key Directions identifies young people who may be considered more vulnerable due to their physical and or emotional problems and levels of understanding of risk.

These risk assessments are maintained by the key worker, manager and DSL in conjunction with identified key staff who ensure that the documents remain responsive to the young person's wellbeing and support requirements. These records include quantifying levels of risk and actions to address them.

Staff in one-to-one situations with young people are more vulnerable to allegations. Staff and young people should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and young people.

Pre-arranged meetings with young people away from Key Directions premises should be cleared with a line manager prior to them taking place.

Individuals must:

Avoid meetings with young people in remote, secluded areas:

- Ensure there is visual access and/or an open door in one-to-one situations.
- Inform other staff of the meeting beforehand, assessing the need to have others present or close by.
- Always report to your line manager or on call manager any situation where a young person becomes distressed or angry.
- Consider the needs and circumstances of the young person involved.

If young people are in 1:1 situations with either their peers or adults in a position of trust then, depending upon whether this is an open or closed environment, the activity needs to be fully risk-assessed to mitigate potential risks.

7. Staff Training

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff and volunteers who will have direct contact with young people and adults at risk will receive an explanation during their induction which will include:

- Key Directions' 'Young People and Adults at Risk Safeguarding' Policy - Signs and symptoms of abuse and neglect
- Responding to disclosure of abuse or neglect
- Reporting and recording arrangements
- Key Directions' Code of Conduct for Staff
- Details of the DSL.

Key Directions' 'Young People and Adults at Risk Safeguarding' Policy and the Key Directions' Code of Conduct for Staff will be sent with the letter confirming an appointment with a written requirement that the individual reads the two policies in advance of starting work for Key Directions. The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood both policies and undertake to comply with them. All staff, including volunteers will receive appropriate and regularly updated safeguarding training and thematic updates as required (at least annually) and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard effectively in line with statutory guidance.

The Lead and DDSLs will attend refresher training every two years. All staff will be made aware of the increased risk of abuse to certain groups, including young people with special educational needs and disabilities, looked after young people, young carers and risks

associated with specific safeguarding issues including child sexual exploitation, extremism, county lines, female genital mutilation and forced marriage. In addition, at least one Director will attend safer recruitment training.

8. Safer Recruitment

8.1 Recruitment

Key Directions ensures it does its utmost to employ 'safe' staff and allow 'safe' volunteers to work with young people by following the guidance in of Safer Recruitment in documents such as Keeping Children Safe in Education 2019.

Safer recruitment means that all applicants will:

- Complete an application form which includes their employment history and explain any gaps in that history;
- Provide two referees, including at least one who can comment on the applicant's suitability to work with young people and vulnerable adults;
- Provide evidence of identity and qualifications;
- If offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include an enhanced DBS check and a barred list check for those engaged in Regulated Activity;
- If offered employment, provide evidence of their right to work in the UK.

Key Directions will also:

- Ensure that every job description and person specification for roles includes a description of the role holder's responsibility for safeguarding;
- Ask at least one question at interview for every role across Key Directions about the candidate's attitude to safeguarding and motivation for working with young people;
- Verify the preferred candidate's mental and physical fitness to carry out their work responsibilities;
- Obtain references for all shortlisted candidates, including internal candidates;
- Carry out additional or alternative checks for applicants who have lived or worked outside the UK.

At least one member of each recruitment panel will have attended safer recruitment

training. All new members of staff and volunteers will undergo an induction that includes familiarisation with Key Directions' 'Young People and Adults at Risk Safeguarding Policy' and Key Directions' Code of Conduct for Staff.

All staff are required to sign to confirm they have received a copy of the Young People and Adults at Risk Safeguarding Policy and Code of Conduct for Staff. Key Directions will obtain written confirmation from supply agencies and third party organisations that they have satisfactorily undertaken all appropriate checks in respect of individuals they provide to work in Key Directions that Key Directions would have undertaken if they were employing the individual directly.

Key Directions maintains a central record of recruitment checks undertaken and ensures that the record is maintained.

All Directors will be the subject of Enhanced DBS checks.

8.2 Volunteers

Volunteers will undergo checks commensurate with their work in Key Directions and contact with young people. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in supporting young people through Key Directions.

8.3 Contractors

Key Directions checks the identity of all contractors working on site and requests DBS checks where appropriate. Contractors who have not undergone checks will not be allowed to work unsupervised (unless the property is empty and a risk assessment is in place).

9. Site Security

Visitors (who are not guests of the resident) to any Key Directions site, including contractors, are asked to sign in and are given an identity badge, which confirms they have permission to be on site. All visitors (including guests of the residents) are expected to observe the safeguarding and health and safety regulations to ensure young people are kept safe.

10. Record Keeping

Key Directions will maintain safeguarding (including early help) records in accordance with the safeguarding policy and Key Directions' Data Protection Policy.

Key Directions will:

- keep clear detailed records of concerns about young people and adults at risk (noting the date, event and action taken), even where there is no need to refer the matter to Social Care immediately;

- ensure all records are kept secure and in locked locations;
- ensure all relevant safeguarding records are sent to the new placement (if appropriate and agreed by all involved and meets GDPR).

Safeguarding records will be maintained independently from the young person's file. Such records will only be accessible to the Designated Safeguarding Lead and other staff who need to be aware. Such records will include, in addition to the name, address and age of the young person, timed and dated observations describing the young person's behaviour, appearance, statements/remarks made to staff or other young person and observations of interactions between the young person, other young people, members of staff and/or parents/carers that give rise to concern.

Where possible and without interpretation, the exact words spoken by the young person or parent/carer will be recorded. Records will be signed, dated and timed by the member of staff making the record and securely stored. Should a Subject Access Request be received under the Data Protection Act 2018, the request should be referred to the DSL (and Data Protection Task Group) for consideration.

The Data Protection Act 2018 / GDPR does not prevent staff from sharing information with relevant agencies, where that information may help to protect a young person.

11. Confidentiality and Information Sharing

All staff will understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the young person, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence. Staff will ensure confidentiality protocols are adhered to and information is shared appropriately in accordance with Key Directions' Data Protection Policy and Data Retention Policy. If in any doubt about confidentiality, staff will seek advice from the DSL or Data Protection Officer as required. It is reasonable for staff to discuss day-to-day concerns about young people with colleagues in order to ensure that their general needs are met. However, staff should report all safeguarding concerns to the DSL.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard. Record of Concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping young people safe. 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 the young people.

12. Off-Site Arrangements

In the event that Key Directions undertakes any trips/activities or overnight trips then they will all be subject to a risk assessment to satisfy health and safety and safeguarding requirements. When and if young people attend off-site activities, including day and residential visits and work related activities, Key Directions, will check that effective safeguarding arrangements are in place. This does not relate to when young people choose of their own volition to go to stay at friend's homes or family homes.

Where extended activities are provided by and managed by Key Directions, the Young People and Adults at Risk Safeguarding Policy and procedures apply. If other organisations provide services or activities on site, Key Directions will check that those organisations have appropriate procedures in place, including safer recruitment procedures.

13. Work Experience and Supported Internships

Key Directions will work with colleges, training providers, employers and other institutions young people may be accessing to ensure they have suitable safeguarding policies and procedures in place and will liaise with them regularly to ensure the safety of the young people supported by Key Directions.

14. Residential Settings

Research has shown that young people and adults at risk can be particularly vulnerable in residential settings. Key Directions will comply with the regulatory requirements set out by CQC and Ofsted for children's homes and adult homes, even though this service is not currently regulated.

Staff are alert to inappropriate relationships, initiation type behaviours and the potential for peer on peer abuse, particularly if there is a significant gender imbalance. Staff receive additional induction and safeguarding training tailored to meet their specific, additional duties.

15. Intimate Care

Key Directions actively promotes the health care of each young person but does not provide any form of intimate or personal care as this is a regulated activity.

16. Safeguarding Students with Special Educational Needs

As outlined in Keeping Children Safe in Education 2019, Key Directions is aware that young people with additional needs or disabilities may be more vulnerable to abuse and additional barriers may exist when recognising abuse and neglect. This could be because:

- Assumptions are made regarding indicators of possible abuse such as behaviour, mood and injury related to the children's young person's or adult at risk disability without due further exploration;

- Such young people are more prone to peer group isolation than other young people;
- The potential for young people with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing signs; and
- Communication barriers and difficulties in overcoming these barriers.

Staff will be trained in recognising signs of abuse in young people and adults at risk with SEN and disabilities.

Staff will take into account the needs of the young person when responding to concerns of abuse or when taking a disclosure. Key Directions recognise that some young people require specialist intervention to communicate and advice will be sought in these circumstances.

17. The Use of Reasonable Force

The following guidance is produced in line with current legislation and government guidance. Key Directions staff should read it in conjunction with the training they receive on Managing Actual and / or Potential Aggression.

Key Directions has a clear policy that they do not use restrictive physical restraint of any form in day to day normal practice. The only time that it would be acceptable to use any form of force would be under 'Duty of Care' where either the individual (member of staff), colleagues or a young person is at immediate risk of harm and requires an intervention to keep them safe. Any force should be appropriate to the situation and reasonable and should be used for the minimum amount of time required to achieve an appropriate level of safety. 'Reasonable' in these circumstances means 'using no more force than is needed'.

Following any incident of 'reasonable force' an incident report must be written and submitted to the DSL and this will be reviewed and any recommendations implemented. It may also require updated of behaviour support plans, risk assessments and a review of placement.

Under no circumstances does Key Directions authorise the use of corporal punishment nor condone the use of inappropriate force.

Key Directions will seek at all times to promote a shared sense of community and belonging amongst young people.

18. Photography and Images

All staff are required to comply with Key Directions Image Use Policy. In summary, to protect young people, Key Directions will:

- seek their consent for photographs to be taken or published (for example, on the Key Directions' website or in newspapers or publications);
- seek parental consent where necessary;
- use only the young person's first name with an image;
- ensure young people are appropriately dressed; and
- encourage young people to tell us if they are worried about any photographs that are taken of them;
- comply with a young person's request if they wish the photo/image to no longer be used.

19. Attendance

Key Directions recognises that full attendance in education/training/employment is important to the well-being of all young people and enables them to access the opportunities made available to them. Attendance is monitored closely and Key Directions works in partnership with the Local Authority, colleges, training providers and employers when patterns of absence give rise to concern.

20. Young People Missing from care or home

Key Directions operates in accordance with Statutory guidance on 'Children who run away or go missing from home or care' 2014.

Key Directions recognises that young people who run away or go missing - and are thus absent from their normal residence - are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm.

'Keeping Children Safe in Education DfE 2019' highlights that 'Statutory Guidance on Children Who Run Away or go Missing from Home or Care' requires that every child or young person who runs away or goes missing must be offered a Return Home Interview (RHI) within a period of 72 hours of their return. When necessary and in conjunction with the Local Authority, Key Directions will facilitate Return Home Interviews, providing an appropriate and safe space for the interview to take place. Key Directions will check with the Local Authority whether or not parents/carers have given their consent to the interview. However, young people aged 16 and 17 years old are generally considered to be able to consent and withhold consent to their own information being shared and, therefore, to participate in a RHI or not.

If the Local Authority has not received consent from parents/carers and the young person is not assessed as being capable of giving or withholding informed consent, Key Directions will contact the parent/carer/Social Worker and seek to secure their consent. Parents/carers may also choose to accompany their son/daughter in interviews and Key Directions will facilitate that as appropriate.

If young people are regularly going missing from their home then this will be recorded and reported by the key worker to their line manager and the DSL. This will in turn be shared with the placing local authority and the host local authority and LADO. Multi-disciplinary meetings will be held and support plans put in place to keep the young person safe.

When a young person returns from a period of missing the key worker will carry out an interview with them to ascertain, where possible, where they have been and if they have come to any harm. The Police will also be involved and notified when they go missing and when they return.

If a young person goes missing staff will be proactive in searching for them and regularly attempting to contact them and ascertain their location.

21. Young People Who Are Looked After

The most common reason for young people becoming looked after is as a result of abuse or neglect. Key Directions ensures that staff have the necessary skills and understanding to keep looked after children safe and ensures that appropriate staff have information about a young person's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after them.

Key Directions is committed to working with other agencies to ensure the best outcomes for looked after and previously looked after children.

22. Online Safety

Key Directions' online safety policy explains how Key Directions tries to keep young people safe and protect and educate them in the safe use of technology. Cyberbullying and sexting by young people will be treated as seriously as any other type of bullying and will be managed through Key Directions' behaviour policy. Serious incidents may be managed in line with the Safeguarding Young People and Adults at Risk Policy and procedures. All staff receive online safety training and Key Directions has a nominated online safety officer.

22.1 Bullying, Peer on Peer Abuse and Harmful Sexual Behaviour

Young people can abuse other young people. This is generally referred to as peer on peer abuse and can take many forms. It is most likely to include, but not limited to:

- Bullying (including cyber-bullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- Sexual violence and sexual harassment, including up skirting;
- Gender based violence;

- Sexting (also known as youth produced sexual imagery);
- Initiation-type violence, hazing and rituals.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through Key Directions anti-bullying procedures. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the DSL will consider implementing early help (Common Assessment Framework) or safeguarding procedures.

Members of staff who become concerned about a young person's sexualised behaviour, including any known online sexualised behaviour, should record their concerns and report them to the DSL and line manager or on call manager as soon as possible, as with any other safeguarding concern.

The management of young people with sexually harmful behaviour is complex and Key Directions will work with other relevant agencies to maintain the safety of the whole community. Young people who display such behaviour may be victims of abuse themselves and the safeguarding procedures will be allowed for both victim and perpetrator.

Any instances of sexual harm caused by one young person to another and any situation where there are concerns about power imbalance, coercion or force will be discussed with Children's or Adult Social Care. In responding to cases involving young people or adults at risk, who have committed sexually abusive behaviours, Social Care will consult with the appropriate agencies for advice, consultation or provision of a direct service.

Key Directions is committed to participating in plans both to provide young people who are at risk from other young people and those who may present a risk to other young people with appropriate services to address any concerns and, wherever possible, to facilitate ongoing access to Key Directions' services for all young people concerned, subject to appropriate risk assessments and risk management plans.

22.2 Youth produced sexual imagery ('Sexting')

'Sexting' refers to any sharing of youth produced sexual imagery between children. This includes:

- A person under the age of 18 creating and sharing sexual imagery of themselves with a peer under 18;
- A person under the age of 18 sharing sexual imagery created by another person under the age of 18 with a peer under 18 or an adult;
- A person under the age of 18 being in possession of sexual imagery created by another person under the age of 18.

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns and recorded on Key Directions' Incident recording form. The primary concern at all times will be the welfare and protection of the young people involved. All incidents of YPSI should be reported to the DSL as with all other safeguarding issues and concerns.

The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. This could include:

- Referral to Police and/or Social Care;
- Sanctions in accordance with the behaviour policy; and/or
- Support for young people to prevent re-occurrence.

The place authority and parents/carers will be informed if appropriate and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm a referral will be made to Social Care and/or the Police immediately.

Key Directions has a responsibility to educate children, young people and adults at risk in the risks to 'sexting' and how to keep safe online.

22.3 Mobile Devices

Children, young people and adults now regularly use mobile devices with the capability to text, phone, access social networks, music, videos & gaming sites, take photographs and record videos. Most people use these devices responsibly & some consider them an important part of their safety. For some, there are concerns over safety & security either as victims or perpetrators of misuse.

Young person misuse:

If inappropriate material is seen on the device, staff should immediately report it to their line manager or the on call manager and the following actions can be taken:

- Retain it as evidence (of a criminal offence or a breach of discipline) advice should be obtained from DSL/DDSL and/or
- Report it to the Police (if the material is of such seriousness).

22.4 Sexual Exploitation of Young People (Child Sexual Exploitation)

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of young people. Victims can be boys or girls. Young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's, young person's or adult at risk physical and emotional health. It may also be linked to the trafficking of children.

Key Directions supports young people in understanding about consent and the risks of sexual exploitation through Key work sessions if appropriate.

A common feature of sexual exploitation is that the young person often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The young person may initially resent what s/he perceives as interference by staff but staff must act on their concerns, as they would for any other type of abuse. All staff are made aware of the indicators of sexual exploitation of young people and all concerns are reported immediately to the DSL. The DSL will consider the need to make a referral to Social Care.

22.5 Honour Based Violence (HBV)

So-called ‘honour-based’ violence encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include forced marriage, and practices such as breast ironing. Staff will be alert to the possibility of a young person being at risk of HBV or already having suffered HBV. All forms of so called HBV are abuse (regardless of the motivation) and staff will record and report any concerns about a young person who might be at risk of HBV to the DSL as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police, and/or Social Care as with any other safeguarding concern; and may also contact the Forced Marriage Unit for advice as necessary.

22.6 Female Genital Mutilation (FGM)

Female genital mutilation is a form of abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women. Staff are trained to be aware of risk indicators. Staff should be particularly alert to suspicions or concerns expressed by female learners about going on a long holiday during the summer holiday period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. In Scotland this practice is illegal under the Prohibition of Female Genital Mutilation Act 2005.

If staff have a concern that a young person may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern.

22.7 Forced Marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure.

It may also involve physical or sexual violence and abuse. A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in the UK. Staff should be particularly alert to suspicions or concerns raised by a young person about being taken abroad and not being allowed to return to the UK. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

22.8 Radicalisation and Extremism (Prevent)

Protecting young people from the risk of radicalisation is part of Key Directions' wider safeguarding duties and is similar in nature to protecting young people from other forms of harm and abuse. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The Government defines extremism as vocal or active opposition to fundamental British values. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. Key Directions is committed to preventing young people from being radicalised and drawn into any form of extremism or terrorism.

Key Directions promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing young people with opportunities through the key work sessions to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all young people are valued and listened to within Key Directions.

Staff receive training that provides them with both the information they need to understand the risks affecting young people and a specific understanding of how to identify individual young people who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern.

Key Directions recognises the importance of providing a safe space for young people to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. However, Key Directions will make appropriate referrals to the Police Prevent team in respect of any young person whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that they receive appropriate support.

Key Directions expects all staff, volunteers, directors, visiting professionals, contractors and individuals or agencies that hire Key Directions' premises to behave in accordance with the Key Directions' Code of Conduct for Staff, will challenge the expression and/or promotion of extremist views and ideas by any adult on Key Directions' premises or at events and, when necessary, will make appropriate referrals in respect of any such adult.

23. Searching, Screening and Confiscation

Where necessary, searching, screening and confiscation will be used to safeguard young people. Key Directions adheres to 'Searching, Screening and Confiscation: Advice for Schools' (May 2018) and if there is suspected contraband within a Key Directions property then staff retain the right to enter the property with immediate effect.

24. Related Safeguarding Portfolio Policies

- Key Directions Code of Conduct for Staff
- Compliment, Worries and Complaints Procedure
- Anti-Bullying Policy
- Whistleblowing Policy
- Safer Recruitment and Selection Policy
- Disciplinary Policy and Procedure
- Grievance Policy and Procedure
- Behaviour Management and Disciplinary Policy
- Absence Procedure

Relevant legislation and guidance

- Keeping Children Safe in Education (Statutory Guidance from Department for Education, September 2019)
- Working Together to Safeguard Children (Department for Education, 2018)
- What to do if you are worried a child is being abused - Advice for practitioners (Department for Education, March 2015)
- Counter-Terrorism and Security Act 2015
- Mental Capacity Act 2005 and Deprivation of Liberty Safeguards (2009)
- Sexual Offences Act 2003
- Searching, Screening and Confiscation 2018
- The Care Act 2014
- The Care Standards Act 2000
- The Children Act 1989 and 2004
- The Children Act 1995 (Scotland)
- Children and Young People (Scotland) Act 2014

- Adult Support and Protection (Scotland) Act 2007
- Education Act 2002 and 2011
- Education and Inspection Act 2006
- The Human Rights Act 1998
- The Protection of Children Act 1999
- Female Genital Mutilation Act 2003 Section 5b (as inserted by section 74 of the Serious Crime Act 2015)

Related documentation

Found at:

Bullying

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

Care Act and Safeguarding

<http://www.scie.org.uk/care-act-2014/safeguarding-adults/>

Channel Duty Guidance HM Government

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf

Keeping Children Safe in Education DfE 2019

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Keeping learners safe, Welsh Government 2015

www.gov.wales/topics/educationandskills/.../keeping-learners-safe/?lang=en

Mental Capacity Act

<http://www.justice.gov.uk/protecting-the-vulnerable/mental-capacity-act>

Children Missing From Education

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_statutory_guidance.pdf

PREVENT Strategy HM Government

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

Types of abuse

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

When and how to share information

<https://www.gov.uk/government/publications/information-sharing-for-practitioners-and-managers>

Working Together to Safeguard Children HM Government 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf

Female Genital Mutilation

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_FINAL.pdf

Forced marriage

<https://www.gov.uk/guidance/forced-marriage>

Impact of non-compliance for staff:

Criminal proceedings, prosecution, disciplinary or regulatory actions/sanctions [DBS barred lists]

Young people increased risk of harm: physical psychological or developmental Increased risks to wellbeing, health and development associated with involvement in FGM, Radicalisation or Extremism, criminal proceedings Legislation / organisation Prosecution/litigation, reputational damage, regulatory action

Glossary of terms:

- Child: a young person under the age of 18. However, in line with the Sexual Offences Act 2003, this age limit may be extended for young people with Learning Difficulties/Disabilities.
- Adult at risk: ‘A person (18 or over) who has needs for care and support (whether or not the local authority is meeting any of those needs), is experiencing, or is at risk of, abuse or neglect and, as a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.
- British Values: Democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. Mutual respect and tolerance includes encouraging students to respect other people with particular regard to the protected characteristics of the Equality Act, 2010.
- Designated Safeguarding Lead (DSL): A senior manager nominated by the Board of Key Directions who has lead responsibility for safeguarding children or adults at risk.
- Extremism: is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

- **Radicalisation:** is the act or process of making a person more radical or in favour of extreme or fundamental changes in political, economic or social conditions. It is often linked to political or religion-based beliefs.
- **Safeguarding:** Safeguarding is about protecting young people from maltreatment; preventing impairment of their health or development; ensuring they grow up in circumstances consistent with the provision of safe and effective care; and taking actions to enable them to have the best outcome.
- **Key Directions** is a privately owned company that provides supported accommodation for young people aged 16-25 years of age and where appropriate older in various provisions located across the UK.
- **Young person:** any young person (service user) who benefits from or accesses any Key Directions service.

Appendix A

I <insert name of staff member> confirm that I have read and understand Key Direction's 'children, young people and adults at risk safeguarding policy and procedures' and will adhere to them.

Signed (signature of staff member):

Name of staff member (in Capitals):

Name of line manager (in Capitals):

Signature of line manager:

Date:

Appendix B

Contacts - Sheffield City Council

Out of Hours: 0114 2821 262

LADO (Local Authority Designated Officer):

Telephone: 0114 273 4850

Email: lado@sheffield.gcsx.gov.uk

Designated Lead for Looked After Children:

Telephone: 0114 273 4855

<https://www.safeguardingsheffieldchildren.org/sscb/safeguardinginformation-and-resources/referringa-safeguarding-concern-to-childrensocial-care>

Local Safeguarding Children's Board

Telephone: 0114 273 4855

Email: sscb@sheffield.gov.uk

Local Safeguarding Adult Board

Telephone: 0114 273 4855

<https://shsc.nhs.uk/wp-content/uploads/2016/05/Safeguarding-Adults-Policy.pdf>