

EBP

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Section 1: Overall Purpose

The EBP operates a Safeguarding Young People Policy to ensure that all young people accessing programmes, activities or events hosted or delivered by The EBP do so safely and with the level of protection and consideration they deserve. The EBP endeavours to work with young people in a person-centred way, meeting their individual needs. Where a young person has an additional or complex need, robust Support Assessments are carried out and Individual Support Plans and Risk Assessments produced to ensure appropriate adaptations can be made as necessary and person-centred support provided. This process is carried out in cohesion with the young person and their parent/guardian, ensuring that they have a say in their support and that their preferences and wishes will remain paramount.

A robust policy is in place to ensure that any concerns, allegations or disclosures concerning young people are appropriately addressed and that all staff and volunteers clearly understand their responsibilities in relation to safeguarding.

The EBP operates a Safer Recruitment Policy and manages allegations and complaints regarding staff and volunteers.

Policy Statement

The EBP is committed to delivering inclusive programmes where young people can develop their skills and thrive within a safe and secure setting. The EBP aims to foster a culture of respect, where differences are valued, equality & diversity is promoted, and young people are encouraged to develop and maximise their true potential. The EBP aims to remove any barriers, bias or discrimination that prevents young people from realising their potential.

Young people have a right to protection from harm, abuse and exploitation, and, where voicing a concern or making a disclosure or allegation, to be taken seriously and to be treated with respect. The EBP endeavours to appropriately work alongside young people and parties involved in their care and support to ensure the best possible outcomes for the young person.

The EBP adopt a contextual approach to safeguarding and recognise that young people may be vulnerable to abuse, harm and exploitation from their extra-familial relationships and interactions within the wider community.

The EBP recognise that young people with additional and complex needs may be at increased risk of abuse or harm due to several factors, including disability or impairment, reliance on others and mental capacity.

This policy outlines the framework for protecting young people from harm, abuse and exploitation. It details the action that will be taken within The EBP to prevent young people from coming to harm and the action that will be taken to appropriately manage and respond to safeguarding concerns.

The EBP recognises that safeguarding is everybody's responsibility and all employed staff, contracted staff and all volunteers, including the Board of Directors and Leadership Team must work in accordance with this policy.

Relevant EBP policies and procedures available via the website or on request from Human Resources

- Safe Handling, Storage and Administration of Medication Policy
- Safeguarding Adults at Risk Policy
- Safer Recruitment Policy
- Anti-bullying and Harassment Policy
- Whistleblowing Policy
- Complaints Policy
- On-Programme Health and Safety Policy
- Social Media Policy
- Data protection Policy
- Information Systems and Security Policy

Legal Context

The EBP Safeguarding Young people Policy underpins:

The Children's Act 2004 (which built upon the Children's Act 1989) states that anyone who is involved in the care of young people should "do what is reasonable, in the circumstances, for the purpose of safeguarding or promoting the child's welfare". This legal obligation is underpinned by the HM Government guidance 'Working Together to Safeguard Children (2018) which sets out how organisations and individuals should work together

Section 11 of the Children Act 2004 places a duty on key people and bodies to make arrangements to ensure that their functions are discharged with regard to the need to safeguard and promote the welfare of children.

Safeguarding and promoting the welfare of children is defined in Working Together 2018 and section 11 Statutory Guidance¹ as:

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

¹ Company compliance is in line with Statutory Guidance on making arrangements to safeguard and promote the welfare of children under section 11 of the Children Act 2004

Under the Human Rights Act 1998, everyone has the right to live free from abuse and neglect. <https://www.equalityhumanrights.com/en/human-rights/human-rights-act>

Due to the educational nature of the work of its activities, The EBP work in conjunction with Department for Education guidance as well as Department of Health and Social Care guidance. Key documents include:

- Keeping Children Safe in Education 2020 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892394/Keeping_children_safe_in_education_2020.pdf
- Special Educational Needs and Disabilities Code of Practice: 0 to 25 years https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/SEND_Code_of_Practice_January_2015.pdf

Copies of this policy are be available to all staff & volunteers. The EBP will not tolerate the abuse of young people and are committed to ensuring that all staff & volunteers are aware of their responsibilities relating to safeguarding, as well as feel confident and supported by the organisation to act when a concern arises.

Definition of terms

Young people	Refers to a children below the age of 18 years
Parent/Guardian	Refers to parents, carers or guardians of young people
Designated Safeguarding Lead (DSL)	The appropriate and named individual responsible for overseeing proper adherence to safeguarding policies and procedures and responsible for the management of concerns in line with local and national procedures At The EBP the DSL is the Education & Skills Manager
Designated Safeguarding Officer (DSO)	At The EBP a team of qualified Designated Safeguarding Officers are named across key departments who are overseen by the DSL
Safeguarding Team	The EBP's team of DSOs, overseen by the company DSL
DBS	Disclosure and Barring Service
Individual Support Plan (ISP)	A person-centred support plan, including risk assessments written in cohesion with young people, their parent/guardian and other care professionals following a robust assessment of support needs
Local Authority/LSCP	Local Safeguarding Children Partnership – A statutory multi-agency partnership based in the young people's area of residence and/or where The EBP operates made up of representatives from the Local Authority, Police, Health Service, Probation Trust, Youth Offending Service, the Voluntary Sector and others for the purpose of safeguarding young people.
LADO	The Local Authority Designated Officer (LADO) works within Children's Services and gives advice and guidance to employers, organisations and other individuals who have concerns about the behaviour of an adult who works with children and young people
Early Help	Early help, also known as early intervention, is support given as soon as a problem emerges, at any stage in a child or young person's life (Department for Education (DfE), 2018). Early help services can be delivered to parents, children or whole families, but their main focus is to improve outcomes for children
GDPR	General Data Protection Regulation underpinning the Data Protect Policy of the organisation
The EBP/ the organisation	The Education Business Partnership

Contextual Safeguarding	An approach to safeguarding that responds to young people's experiences of harm outside of the home, for example, with peers, in schools and in neighbourhoods
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Section 2: Safeguarding Roles and Responsibilities

Chief Executive

- Overall (executive) responsibility for Safeguarding

The EBP Safeguarding Team

Designated Safeguarding Officer(s) DSO

- First point of contact for all staff and volunteers to go to for advice if they are concerned about a young person, this includes out of hours cover when applicable
- Supports staff and volunteers through the process of managing concerns they may have about a young person
- Monitors responses from documented referrals and escalates to the DSL as necessary
- Consults and liaises with Local Authorities as applicable
- Ensures that concerns are logged and stored securely in line with GDPR
- Ensures that The EBP's safeguarding policy and procedures are followed and updated annually

Designated Safeguarding Lead DSL

- Works in line with the priorities of the CEO and Leadership Team to embed safeguarding within the organisation
- Oversees the training strategy for the organisation, ensuring all permanent and temporary staff, as well as all volunteers are trained in line with LSCP strategy and the training requirements of individual contracts
- Where a concern meets the threshold, takes overall responsibility for making referrals to Local Authorities
- Oversees Safeguarding Team to ensure DSOs are keeping abreast of national and local safeguarding issues
- Ensures company policies and procedures remain current and fit for purpose

This policy is available to the public via The EBP website.

Key Safeguarding Contacts

The EBP Chief Executive Overall responsibility for safeguarding	Michelle Allison	01522 574102
The EBP Designated Safeguarding Lead	Becky Sweeney NCS Operations Lead	01522 574102
The EBP Designated Safeguarding Officer	Leo Williams NCS Programme Coordinator	01522 574102
Lincolnshire Children Services (including LADO) Vulnerable Adults Early Help	No named individual	01522 782111 Out of hours emergencies: 01522 782333 01522 782155 01522 782111 email ecfs-families@actionforchildren.org.uk
Norfolk Children Services (including LADO) Vulnerable Adults Early Help	No named individual Advice Referral by e-mail	01362 654532 Out of hours emergencies: 0344 800 8020 0344 800 8020 0300 300 0123 email ecfs-families@actionforchildren.org.uk
Northamptonshire Children Services, (including LADO) Vulnerable Adults Early help	No named individual Referral by e-mail Advice Referral by e-mail	0300 126 1000 Out of hours Emergencies: 01604 626938 0300 126 1000 option 1 mash@northamptonshire.gcsx.gov.uk 0300 126 1000 earlyhelpsupport@northamptonshire.gov.uk
Police Child Protection Police emergency: 999	CEOP (Child Exploitation and Online Protection)	08700 003344
NSPCC	No named individual	Helpline: 08008 005000 Text: 88858 Email: help@nspcc.org.uk
PREVENT Officer Lincolnshire	John Richardson	01522 885350 07500 920489

Section 3: Identifying concerns about a young people

Safeguarding is everyone's responsibility

'Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action'

'Safeguarding and promoting the welfare of children 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'*

Working Together to Safeguard Children, Department for Education, updated July 2018

Safeguarding Concerns & Disclosures

Concerns about a young person may come to the attention of staff/volunteers in several ways:

- A young person may disclose abuse or neglect
- Through observation and identifying any behaviours which may be indicators of the possibility of abuse or neglect - For young people with disabilities it is important to be vigilant of any signs or indicators of upset, having unexplained injuries, presenting differently or reacting differently to people or situations
- Information may be shared by parent/guardians, or other persons or agencies involved with a young person
- A young person may show some signs of physical injury of which there seems to be no reasonable explanation.
- Conduct issues or observed behaviour of a staff member/volunteer or peer, or in the way the staff member/volunteer or peer relates to a young person which alerts them or makes them feel uncomfortable in some way
- Observing indicators of inappropriate discussions or behaviours between staff members/volunteers and young people
- Observing dynamics/behaviours which may indicate abuse between young people or directly observing abuse
- Through social networking media

If a young person makes a disclosure of abuse or neglect it is important to:

- React calmly and make time for the young person
- Reassure them they have done the right thing in telling you and that they are not to blame
- Find an early opportunity to explain you will need to talk to others and explain why
- Take them seriously
- Where the young person has a communication impairment or there is a language barrier, be patient and fully consider how best to help them to express themselves
- Allow the young person to relay their own account of events without interruption in order to build a clear understanding
- Sensitively clarify information using “open” questioning techniques i.e. “tell me”
- Do not make promises of confidentiality or keeping secrets
- Make a full record of what had been said, heard and/or seen as soon as possible. Ensure this includes the time and date, as well as the name of the person completing the record

Actions to Avoid:

- Panicking or showing any personal feelings or reactions to the information being shared
- Probing or investigating **but** it is acceptable to clarify with what they are telling you after they have given their own account (*what, when, who*)
- Asking leading questions or putting words into the young person’s mouth
- Speculating or making assumptions
- Making negative comments or judgements about the alleged abuser
- Approaching the alleged abuser
- Making promises or agreeing to keep secrets

Reasons why young people may not disclose

There may be barriers to young people disclosing information. The power of relationships should not be underestimated nor should the deliberate and skilled way that abusers target their victims. Young people may not disclose information because they:

- Fear the abuser
- Believe they will be taken away from their home
- Believe that services are stigmatising
- Do not recognise they are being abused and think it is normal
- Feel embarrassed
- Feel guilty
- Think that they are to blame
- Don’t want to get the abuser into trouble

- Have communication or learning difficulties
- Have a disability
- May not have the vocabulary to explain what happened
- Are afraid they won't be believed
- Have made a disclosure in the past and nothing has changed
- Or believe they have told, maybe by dropping hints, but haven't been believed so don't try again

Abuse thrives on secrecy and needs to be handled in a person-centred, sensitive and compassionate way. Services may have to overcome certain barriers, such as:

- Sometimes it may be hard to believe what is being disclosed
- It may be difficult to hear that the suspicion may be about someone that is known to them
- The fear of what consequences there may be for 'getting it wrong' for the individual, their family and for themselves.
- Worry that it may make the situation worse
- Believe that the services are stigmatising
- Simply do not wish to be involved
- Do not have the necessary information on what to do or who to contact

It is not the responsibility of anyone working for The EBP to determine whether abuse has taken place. However, it is the responsibility of everyone working with young people to respond appropriately to any concerns they may have and ensure that these are reported to the relevant agencies in a timely manner so that appropriate action can be taken. The EBP Safeguarding Team will take the lead in supporting any staff/volunteers through this process.

Section 4: Guidance for responding to a concern about a young person

Where a staff member or volunteer has a concern about a young person, or a disclosure has been made, it is their duty to support them appropriately and act by notifying the Programme Lead and The EBP Safeguarding Team. The Safeguarding Team will assess the best course of action to take, based on the information provided and will offer ongoing support to the staff and the young person. Where the concern meets the threshold for referral to the Local Authority, it is the role of Children's Services, as part of the Local Authority Local Safeguarding Children's Partnership, and/or the police to investigate allegations or concerns. All staff and volunteers have a duty to work in partnership with the LSCP.

If a staff member or volunteer has a concern they must:

1. Respond

- Take appropriate and immediate action if the young person requires urgent medical attention or protection
- Collect information about the situation and make a thorough and accurate record. Records should include the date and time of the incident or disclosure, parties who were involved, what was said or done and by whom and any further actions taken
- Where every possible, seek consent from the young person to act and to report the concern. If it is decided to act against their wishes or without their consent, you must record your decision and the reasons for this
- Where it has been decided to act against the wishes of the young person, be transparent and ensure they understand that the concern will need to be shared with others
- Where appropriate, signpost the individual to relevant support services

2. Report

- Notify the Programme Lead
- Notify the Safeguarding Team as soon as practicably possible and within the same working day

3. Record

- Complete and return the appropriate reporting form **Appendix A** to ensure a record of the concern is maintained. Written evidence should be factual. Opinions can be included if it is clearly documented that it is an opinion
- Ensure all records are kept securely and confidentially, in line with GDPR

4. Refer

The Safeguarding Team will consider the appropriate action to take, taking the following into account:

- the individual's wishes and preferred outcome
- the safety or wellbeing of young people with additional or complex needs
- whether there is a person in a position of trust involved
- whether a crime has been committed

They will consider whether to:

- **Consult** – utilise the support and guidance from the Local Authority and specialist support services to identify the best course of action.
- **Refer** – where the concern meets the threshold, it may be escalated to the Local Authority, either in the form of an Early Help Assessment or a notification to Children's Services. This ensures that all information is passed through one point of contact and enables responses of agencies to be consistently monitored. This is important at times where several smaller concerns can initiate the escalation process when considered as a whole. This is also essential due to the workforce for certain programmes being made up of temporary/seasonal staff.
 - **Monitor** – advise the staff members/volunteers to monitor the situation and young person to further consider the action required.
 - **Signpost** – Identify appropriate support services to signpost the young person and/or their parent/guardian to for specialist support. Programme staff are also encouraged to signpost young people as appropriate.
 - **Take no further action** – Some minor concerns brought to the attention of the Safeguarding Team may not require further action. The team will use their knowledge and experience to assess this on a case-by-case basis. However, all concerns brought to their attention will be taken seriously and given due attention.

On programme guidance for staff & volunteers

Context of incident	Level	Guideline reporting actions
Non-recent (historical), already referred	Level 4 - Minor	Provide support to YP and signpost to external support services as required
Non-recent (historical), not referred yet and not believed to be at immediate risk of harm	Level 3 - Low-Medium	<ol style="list-style-type: none"> 1. Refer to the DP and or MP safeguarding lead 2. Make formal safeguarding referral and/or take safeguarding lead advice on calling police 3. Signpost to external support services as required 4. Follow NCS Level 3 incident procedures
Incident on programme, YP on YP		
Non-recent (historical) where YP is at immediate risk of harm	Level 2 - Medium- High	<ol style="list-style-type: none"> 1. Notify immediately to DP and or MP safeguarding lead 2. Urgent/emergency formal safeguarding referral 3. Take safeguarding lead advice on calling police 4. Follow NCS Level 2 incident procedures
Incident on programme, YP on YP - serious allegation or sexual assault		
Incident on Programme, Adult/staff on YP	Level 1 - High	<ol style="list-style-type: none"> 1. Notify immediately to DP and or MP safeguarding lead 2. Urgent/emergency formal safeguarding referral 3. Take safeguarding lead advice on calling police 4. Follow NCS Level 1 incident procedures

What The EBP Safeguarding Team will need from staff and volunteers

When escalating a safeguarding concern or disclosure to the Safeguarding Team, staff and mentors will be asked to provide the following information:

- **Facts** – A factual account of what has happened without opinion/hearsay. What has been witnessed or what exactly has been said
- **Actions** – Details of steps the staff team have already taken to support the young person
- **Cooperation** – Follow direction and guidance of the Safeguarding Team
- **Records** – Detailed incident form (**see Appendix A**) or conversation logs, signed and noted with date and time

The team will ask you to provide ongoing updates of the situation so an appropriate response can be made to any developing concerns.

When handling a concern or disclosure, the Safeguarding Team will keep accurate records of all subsequent actions taken, as well as monitor the feedback from the Local Authority on any action taken by themselves. In the event of an unsatisfactory response or action from the Local Authority the team will formerly escalate their concerns within the Local Authority and inform the Chief Executive of The EBP.

Sharing concerns with parent/guardians appropriately

Appropriately sharing information is important in ensuring a robust and considered response to a safeguarding concern. When working with young people, it is important to respect their opinions and wishes, while also taking into consideration their safety and welfare.

When considering speaking to a parent/guardian about a safeguarding concern or disclosure, it is important to take the following into account:

- If discussing the concern will negatively impact upon the welfare or safety of the individual. i.e. where the parent/guardian is the alleged perpetrator of abuse or harm
- If the individual consents to you discussing the concern with their parent/guardian

The individual's welfare is paramount and central to any safeguarding actions taken. There is always a commitment to work in partnership with parent/guardians where there are concerns about a young person. Therefore, in most situations, it will be important to talk to parent/guardians to help clarify any initial concerns. For example, if the individual withdrawn, there may be a clear explanation or additional details information which may help to clarify the most appropriate action to take.

Concerns will not be shared with parent/guardians if it is alleged that they are responsible for the abuse or harm, or there is other information to indicate this will put the individual at increased risk. In such situations, this is be reported to the

Safeguarding Team as soon as possible and recorded. Please see **Appendix C** for the seven rules of information sharing.

All decisions taken regarding the sharing of information will be made in conjunction with the Safeguarding Team, who are responsible for recording the decisions made along with the supporting rationale.

Section 5: Recruitment & Selection of staff and volunteers

The EBP operate a Safer Recruitment Policy (including, when carrying out regulated activity, a Disclosure & Barring Service check) for the recruitment and selection of appropriate staff/volunteers, along with strict Code of Conduct and procedures for supervision.

Position of Trust

All staff who work with young people are deemed to be in a 'position of trust'. The power and influence that a member of staff/volunteer has over someone attending a group, activity or event cannot be under-estimated.

It is therefore vital for all staff/volunteers to recognise and understand their position, strictly adhering to the organisation's policies and procedures. They have a responsibility for their own actions and behaviours but also to exercise vigilance and report any concerns they observe concerning the behaviours or actions of others.

In certain circumstances the 'abuse of trust' is a Criminal Offence (Sexual Offences Act 2003).

Training and Supervision

All staff members and volunteers working with young people will be required to complete mandatory training in safeguarding and will be briefed on this policy and reporting procedures. The EBP utilise training services provided by the Local Safeguarding Children Partnership as well as the knowledge and experience of the Safeguarding Team to provide robust and tailored training.

Staff and volunteers will be monitored and supervised by a Programme Lead and will receive scheduled 1:1 supervision sessions as well as impromptu sessions as needed.

The Programme Lead will be appropriately trained, supervised and supported by staff at The EBP.

Procedures for dealing with allegations against staff and volunteers

Abuse or risk of harm can occur in any environment and be perpetrated by any individual or group of people. This a disciplinary matter and will be dealt with in accordance to The EBP disciplinary procedures. Abuse or risk of harm to young people can occur in the following ways:

A staff member volunteer is known or suspected to have:

- Behaved in a way that has or may have harmed a young person
- Possibly committed a criminal offence against or related to a young person
- Behaved towards a young person in a way that indicates they may pose a risk of harm

Action to follow

Any staff member/volunteer who has concerns over the conduct of another staff member/volunteer is to immediately report this to their Programme Lead, who is in turn responsible for managing the immediate risk (i.e. ensuring the staff member/volunteer is not in direct contact with the young person or any other young person or vulnerable adult). They will then report this to The EBP Safeguarding Team.

If the Programme Lead is unavailable, or is implicated in any way, the staff member/volunteer is to contact the Safeguarding Team directly and follow any instruction they are given.

In such instances, it is vital that the staff member/volunteer raising the concern supports the young person and any other young person or vulnerable adult following the guidance for responding to a concern, ensuring the safety of the group.

The Safeguarding Team, in conjunction with Human Resources, will support the Programme Lead to appropriately manage the alleged perpetrator. If a crime has potentially been committed, the police will be called. They will also notify the LADO at the Children's Services Department of the Local Authority.

The Safeguarding Team will continue to liaise with the Local Authority until all actions have been concluded and an outcome reached.

The EBP assures all staff members/volunteers that it will fully support and protect anyone who, in good faith (without malicious intent), reports a concern about a colleague's practice or the possibility that a young person may have been subjected to abuse or harm. It is also encouraged that if a staff member or volunteer does not feel that the Safeguarding Team has appropriately dealt with a concern that they escalate this within The EBP via the Whistleblowing Procedure. Where a young person remains at risk of harm, it is encouraged that the staff member/volunteer escalates this to the Local Authority.

Human Resources will explain the disciplinary process and offer advice for any employee who has been accused of inappropriate behaviour.

If there is a concern over the conduct of a staff member or volunteer who is not employed by The EBP i.e. an activity centre staff member, this is to be reported to the Programme Lead and Safeguarding Team via the same process.

Types of Investigation

Where there is a complaint of abuse against a member of staff/volunteer, there may be three types of investigation:

- Criminal (led by the police)
- Local Authority (led by the LADO/or the police)
- Performance/capability, disciplinary/ misconduct (led by The EBP)

Civil proceedings may also be initiated by the person/family of the person who alleged the abuse.

The results of any criminal and/ or Local Authority investigation will inform The EBP disciplinary process. In the absence of a criminal prosecution, The EBP will consider the evidence for activating capability or disciplinary procedures. Following the outcome of all enquiries the decision regarding the staff member's future employment will be made by the DSL in conjunction with Human Resources. Please refer to The EBP's Disciplinary Procedure.

Referring to Disclosure and Barring Service (DBS)

If The EBP ceases a contract of employment or terminates the relationship with a volunteer for reasons of harm, risk of harm or because a consideration has been made that they are unsuitable, then The EBP will make a referral to Disclosure and Barring Service (DBS) who will consider all the information and make the final barring decision.

Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned.

Information should be handled and disseminated on a *need to know basis* only. This may include the following people:

- The EBP Safeguarding Team
- The parent/guardian of the individual who is alleged to have been abused, if appropriate
- The individual making the allegation
- Local Authority/Police
- Information will be securely stored in line with GDPR and The EBP Data Protection Policy

Position on lone working with young people

The usual position of The EBP, is for at least two members of EBP staff or volunteers to be present at all times when working with or supervising young people during activities and programmes. It is not agreed practice for lone working, this includes unexpected events such as a n individual requiring a visit to hospital. There must be two staff/volunteers accompanying.

There is an exception for residential elements of programmes delivered by The EBP where individuals require 1:1 care or support, including personal care. In such cases, staff members/volunteers will work strictly within the agreed Individual Support Plan, which will clearly identify the expectations for safely supporting the individual. All ISPs are collated with explicit consent of the parent/guardian and the individual where they have the capacity to do so.

There are further agreed exceptions with specific and planned programmes which The EBP have run in the past (or may run in the future) which focus on the benefits of 1-1 mentoring relationships to enhance the learning opportunities and positive outcomes.

In such programmes, 1:1 mentoring is part of the agreed and planned working arrangements. All mentors undergo rigorous recruitment checks, following the Safer Recruitment guidance and consent is sought. All mentors receive tailored training for their mentoring role which includes understanding their duty as an adult in a position of trust.

Mentors and Mentees are briefed on The EBP's expectations of their conduct during the programme and they receive clear guidance on the expected safe practice in line with The EBP's safeguarding policies and procedures.

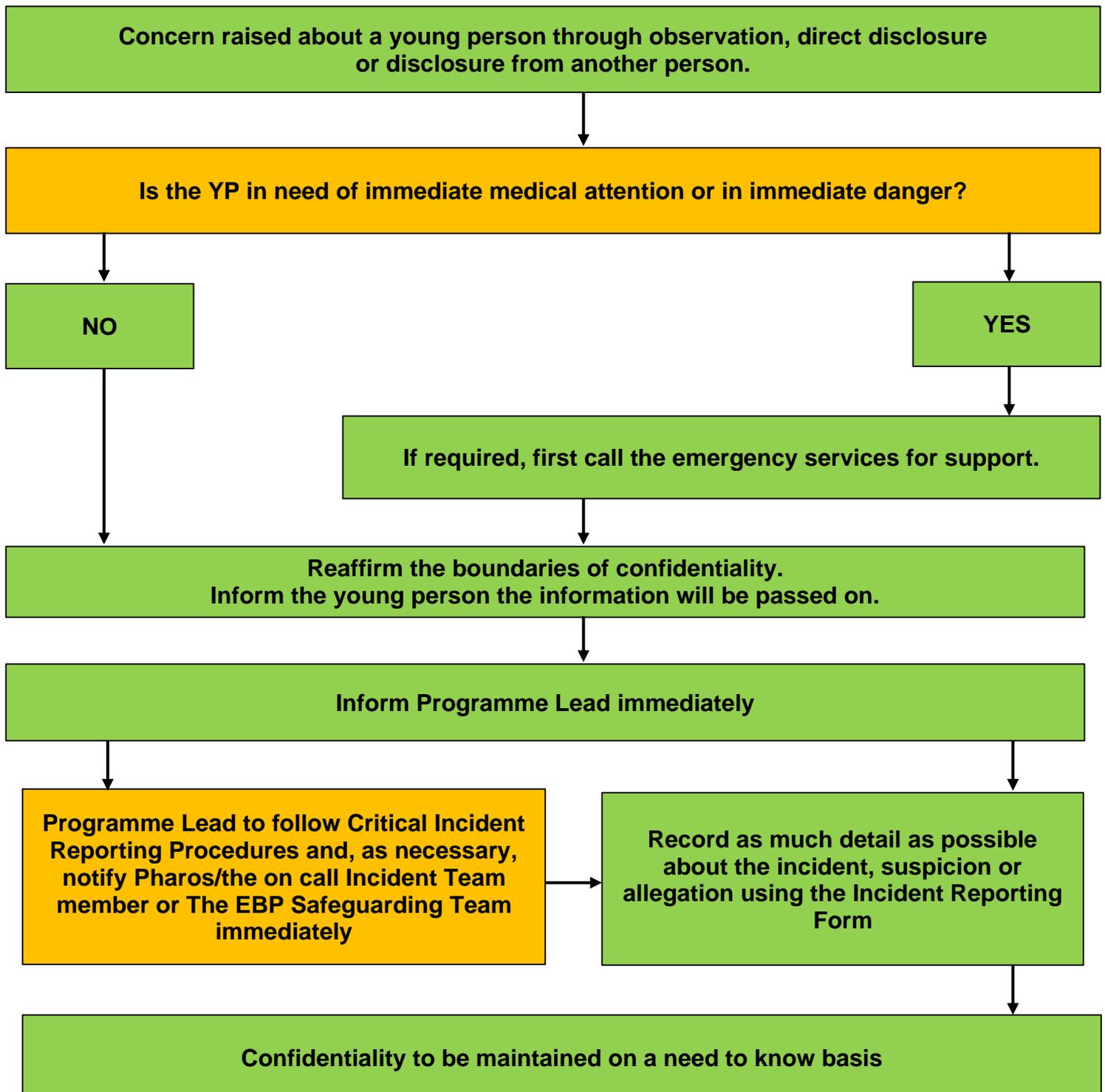
The EBP closely monitors and supervises 1:1 mentoring programmes and expects clear records of all contact, whether electronically or face to face, between the mentor and Mentee. There should be no 1-1 work undertaken on an 'ad hoc' basis.

It is important that staff always work safely in line with the employee code of conduct and follow the agreed guidance within the safeguarding policy and procedure. This is for the protection of young people **AND** to minimise the risk for staff of false allegations.

Staff/mentors should immediately contact the Safeguarding Team for advice should there be any unexpected events which compromise the position of no lone working. As referred to in this policy, except where this is part of the agreed working arrangements outlined in specific programmes.

Section 6 – National Citizen Service NCS specific information

Process for responding to an incident



Staff/volunteer requirements

All staff working on the NCS programme are to complete mandatory online training modules via the NCS Trust. This training includes programme specific safeguarding training as well as modules in incident management and health & safety. Programme staff must also attend 2-day face-to-face training with the EBP, which incorporates safeguarding training, as well as undertake a 'Briefing Day'. All programme staff receive guidance and instructions regarding the expectations of the Employee Code of Conduct as well as clear instructions on the process to follow in the event of a safeguarding concern.

Programme staff are expected to adhere to the safeguarding policy and procedures of the residential provision where they are based. For each residential stay a Critical Incident Plan is produced for each Wave prior to programme. This is to be followed in line with the NCS Trust Reporting procedures.

All programme staff are always to be identifiable and will always wear photographic identification around their necks and the agreed NCS branded clothing.

Recording and Storing Information

Sharing information amongst professionals is essential to safeguard and promote the welfare of children. There are legal restrictions regarding when information can be shared, and it is essential that The EBP complies with this. – **see Appendix C.**

A record is a document, regardless of format or medium (it could be paper or electronic) which is held by the organisation (whether it created or received it).

The information contained within a safeguarding record is confidential and as such managed on a need to know basis. All safeguarding incidents reported are recorded following incident reporting procedures. – **see Appendix A.**

Arrangements for storing and handling records

- Records of any safeguarding concerns will be stored electronically on Salesforce and/or EBP systems only
- All ongoing records are stored securely with access available to the Safeguarding Team only
- Records of allegations against a staff member/volunteer, are stored for a period of 10 years or up to the age of 65, whichever is longer then destroyed. This includes people who have left the organisation
- For all other safeguarding concerns the records will be stored for a period of 6 years and then destroyed
- The Safeguarding Team hold the responsibility to ensure that records are destroyed within the appropriate timeframe.

- Young people and parent/guardians will be informed that records exist, their purpose and use. They will therefore have the right to access them should they wish to. Please refer to The EBP's Data Protection Policy for further details

The EBP will comply with all inter-agency procedures recommended by the Local Authority and comply with any requests for sharing of information.

Implementing and monitoring the Safeguarding Policy & Procedures

The Safeguarding Team are responsible for;

- Disseminating The EBP Safeguarding Young People Policy and Procedure so that it reaches all parts of the organisation and stakeholders, to ensure that it is fully embedded within practice and promote an organisational culture which safeguards the welfare of young people
- Review the Safeguarding Young People Policy & Procedure annually or sooner if new legislation is implemented
- Operating sound procedures for recruiting staff
- Identifying and ensuring staff receive appropriate child protection training
- Ensure all staff comply with the safeguarding training plan
- Keep up to date with updated legislation related to child protection
- Measure the impact of the policy and procedure in day to day activities
- Consult with young people through NCS Regional Youth Board on the effectiveness of the Safeguarding Young People Policy & Procedure

National Citizen Service NCS Code of Conduct

Are you ready to be the best NCS staff you can be and support a team of young people to have the summer of their lives?

Whether you're returning staff or brand new to NCS, The EBP want you to get the very best from your experience. Our team are on hand to guide and support you to run an amazing NCS programme, where young people can challenge themselves and gain new skills in a safe environment.

We've put together this code of conduct to give you some clear guidance of the expectations of NCS staff.

- Always bring your A game. Remember your sense of fun and adventure and be prepared to push yourself beyond your comfort zone.
- Be a team player. Support your team of staff and work together, putting the welfare and experience of the young people before anything else.
- Be ready for a challenge. There will be times you need to think on your feet. Use your training and your staff handbook/workbook to help you with this and don't be afraid to ask for guidance from your Wave Lead or the team at The EBP.

- Set expectations with your group of young people. Remember to ask what they expect of you as staff too!
- Be committed to supporting the young people to have the summer of their lives.
- Be a great role model. Use your position to be a positive influence, promoting healthy and appropriate behaviour.
- Be inspirational and motivate the young people to do great things.
- Be a professional. Work with your Programme Lead and follow the processes put in place for you, including reporting lateness or absence.
- Be fit for the role – no drinking, drugs or legal highs.
- Always prioritise the safety and wellbeing of the young people – remember The EBP Safeguarding Team are just a phone call away.
- Promote and maintain appropriate relationships with the young people. Keep your relationships strictly professional and remember to keep all of your social media profiles private and not to accept any friend request from a young person. Don't swap contact details with the young people, arrange to meet them outside of the NCS programme or take photos or videos of them on your private phone, tablet or any other device.
- Remember our policy on lone working with a young person and ensure you're always in sight of others. Never enter a young person's sleeping accommodation on your own or invite them to yours.
- Use your position to help, encourage and support the young people.
- Know your limitations in supporting the young people and remember to sign-post them to appropriate support services where necessary. There is a list of useful support services available in your handbook and The EBP Safeguarding Team can also help you to find the right place to sign-post a young person to if they require specialised support.
- Dress for the role. Your clothes will need to be suitable for a number of different activities and so we've provided you with a kit list. You will be representing both the NCS Trust and The EBP, so remember to dress appropriately and to wear your lanyard and identification at all times.
- Always show others respect.
- Look after site facilities, as well as any equipment, materials or paperwork that has been allocated to you.
- Be vigilant. Know where your group are and what they are up to at all times.

- Have fun and remember that The EBP are here to support you!

Safeguarding young people before and after programme (dropping off and picking up)

The EBP is committed to keeping young people safe when accessing our programmes, including when traveling to and from the programme. The EBP acknowledges that there are significant age differences in the young people accessing our programmes and that careful consideration is required to meet individual needs, whilst respecting the independence of the young people and the wishes of their parents. The age groups of each programme delivered by The EBP and our responsibilities regarding transport are defined below.

National Citizen Service (NCS) - *Aimed at students aged between 15-17 years (up to age 25 with additional needs)*

Phase 1 & 2 – Residential Phases

Phase 1 & 2 of the NCS programme are normally held at a location outside of the young person's place of residence. In particular, phase 1 of the programme can be held a significant distance away.

The EBP provides transportation (coaches) to and from each phase. Each coach is supervised by a NCS nominated staff member employed by The EBP, who completes a register of all young people boarding the coach. The time and location of the pick-up and drop-off for each young person is pre-agreed with their parent/guardian. Due to the age group of the young people accessing the programme, The EBP acknowledges the right of the parent/guardian to decide themselves how their young person will travel to and from the pick-up and drop-off points. The EBP does not supervise this, however, demonstrates due diligence in supporting any young person who has a problem in safely making their way home after being dropped off at their agreed location.

The nominated staff member in charge of supervising the coach journey will be issued with a list of young people on the journey, their drop off points and if they are to be collected by a parent/guardian or make their way home independently. Parent/guardians are given contact details so they have a nominated point of contact should there be concerns over their young person's whereabouts following a drop off.

Phase 3 & 4 – Social Action Phase & Graduation

Phase 3 & 4 of the NCS programme are carried out in the local community or in neighbouring communities. Due to the age group of the young people, it is left to parent/guardians to make their own arrangements with their young person as to how they will travel to and from each session. This is agreed with parent/guardians when they give consent for their young person to access the programme and is highlighted in the confirmation letter and transport letter, which are sent out to parent/guardians before the programme commences.

Additional Support Needs

Young people with additional support needs accessing the programme have a pre-agreed support plan in place, which includes a clear plan for transportation to and from the programme. Each support plan is person centred and reflects the individual need of the young person; therefore, a blanket rule cannot be applied. The EBP will ensure that support plans are rigidly followed, and that each young person's assigned staff member will remain with them until they are in the care of an agreed person.

Expulsion from Programme

If a young person is asked to leave any phase of the NCS programme for any reason (i.e. a breach of social bond), The EBP acknowledges its duty in ensuring that they are safely transported home.

In the first instance, their parent/guardian will be contacted by the Programme Lead and informed of the situation. They will then be asked to make arrangements to collect their young person. Due to the age group of the young people accessing the programme, The EBP acknowledges the parent/guardian's right to make alternative transport arrangements for their young person i.e. train/bus etc.

If the parent cannot make arrangements for their young person to travel home, then The EBP will arrange a taxi (from a list of local authority approved providers) to transport the young person home.

Early Termination of Programme

In the event of early programme termination of the NCS programme, during phases 1 and 2 The EBP will make arrangements to return young people back to their areas of residence. During phase 3, it is reasonably expected that young people will be able to make their own transport arrangements due to the activity taking place in their own local community.

Whilst transport will be arranged to pre-agreed schedules for the outgoing and returning journeys, contingency arrangements will be made for the emergency organisation of transport.

In all instances, the parents of the affected young people will be contacted and notified of the amendment to travel arrangements.

Young Person leaving Programme

Where a young person has themselves decided to leave the NCS programme, programme staff will demonstrate due diligence in supporting them to make transport arrangements with their parent.

Programme staff will be vigilant in monitoring any areas for concern, or situations which may present a risk to the young person and communicate with the parent/guardian in a timely manner.

Example

During Phase 3 of the NCS programme, a young person aged 15 is carrying out a Social Action Project in her hometown. She tells programme staff that she is feeling unwell and wishes to go home. Programme staff made arrangements to notify her parent/guardian, but in the time, it takes them to do this, the young person has already phoned her sister who is now on her way to pick her up and bring her home. Programme staff acknowledge that with the young person's age comes a level of capacity, responsibility and maturity to make such plans, but continue to exercise their duty of care by contacting the parent/guardian to notify them of the arrangement.

Section 7: Appendices

Appendix A – Incident/Accident records & logs

Incident/Accident Report

Programme details			
Programme:			
Date:		Time:	

Incident level (Circle as appropriate)		
EBP Programme	NCS Programme	
High	1	2
Medium	3	
Low	4	

Person details			
Name:			
Involvement: <i>Young person/staff member/member of public etc.</i>			
Emergency contact notified:	Y/N	Time:	
Contact details of person & emergency contact: <i>Where not already held by The EBP</i>			
Witness:			

Incident details			
Incident type: <i>Accident/injury/illness/safeguarding/crime etc.</i>			
Emergency services notified:	Y/N	Time:	
Service requested:			

Incident summary

Incident summary continued

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Outcome/resolution

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Record details

Completed by:			
Date:		Time:	
Critical Incident Team notified:	Y/N	Name:	
Date:		Time:	

Incident/Accident Report- Running Log

Incident details	
Incident relating to: <i>Name/event etc.</i>	
Programme:	
Date:	

Incident update

Additional action required	Assigned to	Date completed
<i>make notifications to H&S/Safeguarding agencies as appropriate</i>		
<i>Notify stakeholders including The EBP Board and Insurers as appropriate</i>		

Outcome/Resolution

Incident closure			
Closed by: <i>Name & position</i>			
Signature:		Date:	

Critical Incident – Telephone crib sheet (For Critical Incident Team use only)

Caller details			
Name:			
Position:			
Date:		Time:	

Programme details	
Programme:	
Location:	

Incident details			
Location:			
Date:		Time:	
People involved: <i>Names of YPs, staff, partners, others.</i>			
Summary of incident:			
Emergency services notified:	Y/N	Time:	
Service requested:			
Police incident number:			
Details of casualties/injuries:			
Medical treatment received:	Y/N	Time:	
Treatment administered by:			
Location:			
Emergency Contact notified:	Y/N	Time:	
Further details:			

Appendix B – Types of abuse and recognised safeguarding concerns specific to young people

There are four categories of harm as defined in Working Together to Safeguard Children 2018. Young people can experience one or more categories of harm. Both adults and children may abuse or inflict harm on children. Perpetrators of harm are both male and female and may act alone or with others.

Neglect 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 maternal substance abuse. Once a young person is born, neglect may involve a parent/guardian 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)
- Ensure access to appropriate medical care or treatment

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

The physical signs of neglect may be:

- Constant hunger, sometimes stealing food from other young people
- Constantly dirty or 'smelly'
- Loss of weight, or being constantly underweight
- Inappropriate dress for the conditions

Changes in behaviour which can also indicate neglect may include:

- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning they're often being left alone or unsupervised

The above list is not meant to be definitive but as a guide to assist you. It is important to remember that many children and young people will exhibit some of these indicators at some time, and the presence of one or more should not be taken as proof that abuse is occurring.

There may well be other reasons for changes in behaviour, such as death or the birth of a new baby in the family, relationship problems between their parents/carers, etc.

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical

harm to a young person. Physical harm may also be caused when a parent/guardian or carer fabricates the symptoms of, or deliberately induces, illness in a young person.

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body
- Bruising which reflects hand marks or fingers (from slapping or pinching)
- Cigarette burns
- Bite marks
- Broken bones
- Scalds

Changes in behaviour which can also indicate physical abuse:

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example wearing long sleeves in hot weather
- Depression
- Withdrawn behaviour
- Running away from home

Sexual abuse and exploitation involves grooming, forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex)
- Non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving young person in looking at, or in the production of, sexual images, watching sexual activities, encouraging a young person to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse (including via the internet)

Sexual abuse can be perpetrated by a person of any gender or age.

The physical signs of sexual abuse may include:

- Pain or itching in the genital/anal areas
- Bruising or bleeding near genital/anal areas
- Sexually transmitted diseases
- Vaginal discharge or infection
- Stomach pains

- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age or development level
- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets that they can't tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults

Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on the young person's emotional development. It may involve conveying to a 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 a young person, 'making fun' of what they say/communicate
- Age or developmentally inappropriate expectations being imposed on a young person. These may include interactions that are beyond a young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction
- A young person seeing or hearing the ill-treatment of another
- Serious bullying (including cyber bullying), causing a young person frequently to feel frightened or in danger, or the exploitation or corruption of young person

Some level of emotional abuse is involved in all types of maltreatment of a young person, though it may occur as the sole form of abuse for a young person/young person.

The physical signs of emotional abuse may include:

- A failure to thrive or grow, particularly if the young person puts on weight in other circumstances, e.g. hospital or away from parent/guardian's care
- Sudden speech disorders
- Development delay, either in terms of physical or emotional progress

Changes in behaviour which can also indicate emotional abuse include:

- Neurotic behaviour, e.g. hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Self-harm
- Fear of parent/guardians being approached about their behaviour

Young people living away from home

Every setting in which young people live away from home should provide the same basic safeguards against abuse, founded on an approach that promotes their general welfare, protects them from harm of all kinds and treats them with dignity and respect. Young people may live away from home for several reasons and in a number of settings, for example: foster care, residential care, hospital, custody and private fostering.

Private fostering is an arrangement made by a parent (without the involvement of the Local Authority for the care of a young person under the age of 16 (18 if disabled) for a child to live with a person other than a parent or close relative for 28 days or more. Privately fostered young people include:

- A parent agreeing for their young person to be cared for by a friend or neighbour
- Young people under 16 years who have left home and are staying with friends/acquaintances
- Asylum seeking and refugee young people who are not looked after or living with a relative
- Language students living with host families
- Children sent from abroad to stay with another family, usually to improve their educational opportunities

Under the Children Act 1989, private foster carers and those with parental responsibility are required to notify the LA of their intention to privately foster.

All staff should notify the LA of a private fostering arrangement that comes to their attention, where they are not satisfied that the LA has been or will be notified of the arrangement.

Contact

- Lincolnshire Customer Service Centre: 01522 782111.
- Rutland County Council Children's Services: 01572 758407.
- Leicestershire Children's First Response Team 0116 3050005
- Northamptonshire MASH Team 0300 126 1000
- Local Authority of the child/young person's place of residence

For further guidance see the relevant LA's Local Safeguarding Children Partnership (LSCP)².

² <http://lincolnshirescb.proceduresonline.com>

Young People with additional or complex needs

Young People with additional or complex needs may be especially vulnerable to abuse for a number of reasons:

- Have fewer outside contacts
- May receive intimate personal care, possibly from a number of carers, which may both increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries
- Have an impaired capacity to resist or avoid abuse
- Have communication difficulties that may make it difficult to tell others what is happening
- Be inhibited about complaining because of a fear of losing services
- Be especially vulnerable to bullying and intimidation
- Be more vulnerable than other young people to abuse by their peers

Race and racism

Young People from black and minority ethnic groups are likely to have experienced harassment, racial discrimination and institutional racism. The experience of racism is likely to affect the responses of the child and parents to assessment and enquiry processes.

Domestic violence

Domestic abuse is any type of controlling, bullying threatening or violent behaviour between people in a relationship. It includes emotional, physical, sexual, financial or psychological abuse.

Abusive behaviour can occur in any relationship. It can continue even after the relationship has ended. It can seriously harm children and young people. Witnessing domestic abuse is child abuse and young people can suffer domestic abuse in their relationships. Young people exposed to domestic violence are at a greater risk of behavioural, emotional, physical and long-term developmental problems.

Drug-misusing parent/guardians

Parental drug misuse can and does cause harm to young people at every age, from conception to adulthood, including physical and emotional abuse and neglect. A thorough assessment is required to determine the extent of need and level of risk of harm in every case.

Child abuse linked to belief in “possession” or “witchcraft”

The belief in “possession” and “witchcraft” is widespread. It is not confined to countries, cultures or religions. The number of known cases of child abuse linked to accusations of “possession” or “witchcraft” is small, but young people involved can suffer damage to

their physical and mental health, capacity to learn, ability to form relationships and self-esteem.

Child abuse and information communication technology (ICT)

The range of child abuse definitions are now being seen in an ICT environment. The internet has become a significant tool in the distribution of indecent photographs of children and young people. Internet chat rooms, discussion forums etc. are used as a means of contacting young people with a view to grooming them for inappropriate or abusive relationships. Contacts made initially in a chat room can be carried on via email, instant messaging services, mobile phones or text messaging. There is also a growing cause for concern about the exposure of children to inappropriate material via ICT, e.g. adult pornography and cyberbullying*. Where there is evidence of a young person using ICT excessively, this may be a cause for concern.

(*see section on "Peer on Peer Abuse".)

Young people and families who go missing

Local Authorities and professionals should bear in mind, when working with young people and families where there are outstanding concerns about the young person's safety and welfare (including concerns about the welfare of an unborn child who may be at risk of future harm) that a series of missed appointments may mean the family have moved. Children's Social Care and the Police should be informed as soon as such concerns arise.

Young people who are 'looked after' sometimes go missing from their placements. There are procedures in place, which should be followed when this occurs. If a young person is receiving an education, not only do they have the opportunity to fulfil their potential, but they are also in an environment that enables Local Authorities to safeguard and promote their welfare. If a young person goes missing from education, they could be at risk of significant harm. There are several reasons why young people go missing from education and some children and young people are more vulnerable to going missing than others. These could include children living in temporary accommodation, refugees, travellers, young carers, migrant children, and young people who are permanently excluded from education.

Young people at risk of child sexual exploitation (CSE)

Abusive adults will look out for signs of vulnerability in selecting a young person to target.

These include:

- Young people who have been the victim of physical abuse, sexual abuse, neglect and emotional abuse
- Young people from households where domestic violence and abuse has been a feature
- Young people of parent/guardians with a high level of vulnerabilities (e.g. drug and/or alcohol misuse, mental illness, learning disabilities, mental health issues etc.
- Family breakdown/disrupted family life/problematic parenting

- Young people who have additional or complex needs
- Insecure immigration status

Some grooming techniques used to gain a young person's attention:

- Being liked by someone older
- Being liked/fancied enough that a stranger asks for their mobile number
- Meeting someone who thinks they are special on the internet
- Receiving alcohol, drugs, money or gifts
- Getting a buzz and the excitement of risk taking/forbidden behaviour
- Being offered somewhere to stay where there are no rules/boundaries
- Being taken along to adult entertainment venues, red light or cruising areas (public sex environments)
- Being given lifts, taken to new places, and having adventures with a casual acquaintance

Known indicators of CSE

- Having new possessions, mobile phones, money, expensive clothes, drugs or other possessions without plausible explanation about their source
- Periods of being missing including overnight
- In a relationship with someone older or relationship with a controlling adult
- Physical or emotional abuse from that relationship
- Entering and/or leaving vehicles driven by unknown adults
- Physical injury without plausible explanation
- Frequenting areas referred to as 'hotspots' known for concerns regarding CSE or areas where sex work or criminal activity is prevalent

Young people from families living in temporary accommodation

Placement in temporary accommodation, often at a distance from previous support networks, can lead to individuals and families falling through the net and becoming disengaged from services. Where there are concerns about a young person in temporary accommodation, safeguarding procedures should be followed.

Migrant children

Particular attention should be paid to child victims of trafficking and unaccompanied asylum-seeking children.

Child victims of trafficking

Trafficking involves a collection of crimes, spanning a variety of countries and involving increasing number of victims. It includes the exploitation of children through force, coercion, threat etc. If it is suspected that a child is the victim of trafficking, the Police or Children's Social Care should be informed.

Modern slavery

Modern slavery is associated with many types of abuse against individuals of any age from any background. This includes slavery, forced servitude or manual labour, forced sex work, sexual exploitation, forced organ donation and other forced criminal acts

such as moving drugs or money for individuals or gangs (*often referred to as 'county lines'*).

Unaccompanied asylum-seeking children (UASC)

A UASC is an asylum-seeking child under the age of 18 who is not living with their parent, relative or guardian in the UK. Such children should be referred to Children's Social Care.

Young People who may have been affected by gang activity

Overall, young people who are particularly vulnerable to suffering harm in the gang context are those who are:

- Not involved in gangs, but living in an area where gangs are active, which can have a negative impact on their ability to be safe, feel safe, healthy and engage in their community.
- Not involved in gangs, but at risk of becoming victims of gangs.
- Not involved in gangs but at risk of becoming drawn in, for example, from siblings or children of known gang members.
- Are involved in a gang and at risk of harm through their gang-related activities (e.g. drug supply, weapon use, sexual exploitation and risk of attack from own or rival gang members).

Young people at risk of female genital mutilation (FGM) (multi agency practice guidelines HM Government 2014)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons.

It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies.

The practice causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person (see below).

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Indications that FGM may be about to take place soon:

- It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.
- A professional may hear reference to FGM in conversation, i.e. a girl may tell other children about it.
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may request help from an adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent.
- Parents seeking to withdraw their children from learning about FGM.

Indicators that FGM may have already taken place:

- A girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating.
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from school or college.
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl or woman may be particularly reluctant to undergo normal medical examinations.
- A girl or woman may confide in a professional.
- A girl or woman may ask for help but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs.

(Multi-Agency Practice Guidelines: Female Genital Mutilation, HM Government 2014)

Young People at risk of forced marriage

A forced marriage is a marriage conducted without the full consent of both parties and where duress (emotional pressure in addition to physical abuse) is a factor. It is an entirely separate issue from arranged marriage, and the two should not be confused. In an arranged or assisted marriage, the families take a role in choosing

and introducing the marriage partners, but the marriage is entered into freely by both people, without duress being a factor. In a forced marriage, this consent does not exist.

Appendix C - The seven principles of sharing information following General Data Protection Regulations (GDPR)

1. **Lawfulness, fairness and transparency** - Remember that data protection and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living young people is shared appropriately.
2. **Purpose limitation** – Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. **Data minimisation** -. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
4. **Accuracy** – Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those young people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely .
5. **Storage limitation** – Keep the information records which identify young people by name for no longer than is necessary for the purpose it was originally intended. Personal data may be stored for longer periods if anonymised and used for the purpose of statistical data.
6. **Integrity and confidentiality** – Consider safety and well-being. Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
7. **Accountability** – If you are in any doubt about sharing information and remaining compliant with legislation, seek advice from other practitioners, without disclosing the identity of the individual where possible.

Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Appendix D – Prevent Duty

Prevent

The Prevent duty is one of the four elements of ‘contest’ the Counter-Terrorism and Security Act 2015. The Prevent duty outlines the responsibilities to have due regard to the need to prevent people from being drawn into terrorism.

The EBP recognises its responsibilities to safeguard young people at risk of radicalisation and works closely with Lincolnshire Police to ensure staff receive robust training and understand how to raise awareness of radicalisation through the work it undertakes with young people, recognise the signs and indicators of radicalisation and how to proceed if they have a concern about a young person.

The Prevent strategy has three objectives:

- Challenging the ideology that supports terrorism and those who promote it
- Protecting vulnerable people
- Supporting sectors and institutions where there are risks of radicalisation

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

If any of The EBP staff members/volunteers are concerned that a young people may be being drawn into violent extremist or terrorist behaviour they should report their concerns to the Safeguarding Team, following the outlined reporting procedure. The Safeguarding Team will collate all the information and make a referral to Channel Panel if applicable.

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the Local Authority. If suitable, the case is then discussed at a Channel Panel of relevant partners to decide if support is necessary.

All written records about a young people must be retained securely and confidentially and marked as sensitive within the relevant service recording system.

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a multi-agency package of bespoke support for the young people.

Young people at risk of radicalisation and extremism

Possible indicators of vulnerability are a young person experiencing:

- Exposure to extremist material and narrow points of view, friends or family who have joined extremist groups.
- Confusion and/or crisis about identity and sense of belonging in their family, community or in British society and feeling distant from their cultural or religious heritage.
- Difficult personal circumstances, such as tensions in the family or having experienced a traumatic event impacting on their vulnerability.
- Low self-esteem, perceptions of injustice and feelings of failure combined with a strong sense of grievance, often triggered by personal experience of racism or discrimination.
- Disadvantages due to special educational needs such as difficulties in interacting socially, empathising or understand the consequences of their actions and picking up on the motivation and intentions of others.
- Tensions in the local community, events affecting their country or region of origin.
- Involvement in criminality and difficulties in reintegrating after being in prison or a young offender institution.

Possible signs of radicalisation and extremism are:

- Acting out of character, changing appearance or clothing
- Argumentative and unwilling to listen to other people's points of view
- Refusing to engage with or becoming abusive to others who are different
- Susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups both on-line and off-line and rejecting activities they use to enjoy
- Changing their on-line identity, including their social media name or profile image and/or having two parallel on-line profiles
- Spending excessive amounts of time on-line or on their phone and be secretive and reluctant to discuss what they're doing
- Explicit signs include expressions of sympathy for extremist ideologies, accessing extremist material online, glorifying violence and intolerance of difference to other faiths and cultures, contact with extremist recruiters and joining or seeking to join extremist organisations

The indicators are not exhaustive, nor does the presence of one or more vulnerabilities mean a young person is at risk. However, where there are signs which indicate a young person is at risk of harm these concerns should be acted upon. Staff and volunteers must follow the reporting concerns process and contact the Safeguarding Team.

Appendix E - Peer-on-peer abuse

1. The EBP's responsibilities

Introduction

At The EBP, we are committed to the prevention, early identification and appropriate management of peer-on-peer abuse (as identified below) during all of our programmes. We recognise the importance of adopting a contextual safeguarding approach and endeavour to play our part in identifying and preventing safeguarding issues concerning young people beyond our programmes and in the wider community.

We are committed to:

- raising awareness of the level and nature of risk to which the young people accessing our programmes are or may be exposed and putting robust minimisation strategies into place
- raising awareness of peer-on-peer abuse amongst the whole team, providing robust training and developing skills and confidence in appropriately managing issues
- recognising national and increasing concerns regarding the issue and ensuring we have a suitable strategy in place to keep the young people accessing our programmes safe
- applying a contextual safeguarding approach, recognising local risks and playing our part in identifying and managing concerns beyond our programmes
- working in a transparent and open way, and expecting parents to hold us accountable and act where their young person has felt unsafe as a result of the behaviour of their peers

Aim of policy

The policy aims to:

- define a clear strategy for identifying, managing and preventing peer-on-peer abuse, including staff training and development
- based on the analysis and interpretation of recent incident data both internally and locally, define the level and nature of peer-on-peer abuse the young people accessing our programmes are or may be exposed to
- apply to all of the team working within The EBP including the Chief Executive and Leadership Team, all temporary workers, volunteers, partners or any other party undertaking work on our behalf
- be subject to continual review based on the most relevant incident data, local trends and feedback from young people, parents and The EBP team
- be read in conjunction with The EBP's Safeguarding Policy as well as the young people's Social Bond (Code of Conduct)

- not use the term ‘victim’ and/or ‘perpetrator’. The EBP takes a safeguarding approach to all young people involved in allegations or concerns of peer-on-peer abuse, recognising that many young people who present behaviours of concern towards their peers have often themselves been vulnerable to harmful behaviours from others (including peers, parents and the wider community)
- underpin the Local Safeguarding Children Partnership (**LSCP**)/Safeguarding Partners Policies and Procedures and the *Working together to safeguard children 2018* document
- Hold guidance issued by the Department for Education (**DfE**) on *Keeping Children Safe in Education* and *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges* in the highest regard

2. Understanding peer-on-peer abuse

What is peer-on-peer abuse?

Peer-on-peer abuse takes the form of:

- physical, sexual, emotional or financial abuse, or coercive control exercised between young people or within young people’s relationships
- bullying (including cyber bullying), relationship abuse, domestic violence, child sexual exploitation (**CSE**), youth violence, harmful sexual behaviour or gender-based violence
- isolated or non-isolated incidents
- several types of abuse occurring within one relationship

Examples

A) *A female aged 15 years is in a relationship with an older male aged 17 years. The male is physically abusive towards her and also exerts coercive control over her by demanding she dress in a certain way, forbidding her from spending time with her friends and insisting she calls or texts him as soon as she’s finished at school so he can check up on what she is doing. He has started to demand that she send him nude photos, which he shares with his friends. At home, the female is withdrawing from her parents. They know there is a problem and can see the signs of an abusive relationship, but they cannot get through to her.*

B) *A male aged 16 years is on the National Citizen Service programme. A male from his school is on the same Wave and has discouraged others from spending time with him or allowing him to join in group activities. Members of the Wave added him on Instagram and started to leave hurtful comments on his photos. He blocked their profiles, but a friend from school has since told him that the group has been making videos about him and posting them on Facebook and Instagram.*

What is contextual safeguarding and why is it important for The EBP?

Contextual safeguarding is an approach which recognises a young person's risk of experiencing significant harm in an extra-familial environment. The EBP recognises that young people who have reached adolescence spend increased amounts of time outside of their home. This includes time spent on-line. Young people are therefore mixing with a wider group of peers and their associates, as well as experiencing the wider community. This can lead to harmful or abusive experiences, which are out of the parent's influence and can undermine the young person/parent relationship.

The EBP recognises that the programmes we deliver to young people are outside of their school or home environment. We are often introducing young people to a new environment, peer group and experience. We therefore must exercise our duty of care in applying a contextual safeguarding approach in preventing, recognising and managing peer-on-peer abuse.

Recognising peer-on-peer abuse

Signs that a young person is experiencing peer-on-peer abuse may include:

- reluctance, fear or caution in joining in with the group
- periods of isolation when the peer group is interacting
- abusive behaviour towards others
- disclosures or signs of alcohol/drug misuse
- difficulties with emotional wellbeing
- acting or speaking in a way that is not appropriate for their age
- physical injuries
- talk of older peers
- talk of illegal activities

3. Scope of policy

The EBP recognises that a robust strategy for preventing and managing peer-on-peer abuse must be in place and championed by *every* staff member within the organisation, from the Chief Executive to the mentors supporting the young people. The EBP acknowledges that safeguarding is everybody's responsibility and fosters a culture where the safeguarding of all young people is at the forefront of our activities.

Managing peer-on-peer abuse

If peer-on-peer abuse is witnessed, reported or disclosed, The EBP will endeavour to adopt the same appropriate, sensitive and prompt approach as outlined in the company's *Safeguarding Young People Policy*.

Where peer-on-peer abuse is alleged against another young person/people on an EBP programme:

- consider whether the affected young person is in immediate danger or requires medical attention

- consider whether a crime has been committed
- consider whether the incident is isolated or could be part of a wider safeguarding concern for either of the young people
- where a young person has broken their social bond, expulsion from the programme may be actioned. This must be handled sensitively and factually
- notify the **Safeguarding Team** who will seek the view of the affected young person and their parent/guardian of the situation and how they would like it to be handled before making a referral

Where peer-on-peer abuse is alleged against another young person/people outside of an EBP programme:

- consider whether the young person is in immediate danger or requires medical attention
- consider whether a crime has been committed
- consider whether the incident is isolated or could be part of a wider safeguarding concern
- notify the **Safeguarding Team** who will seek the view of the young person and their parent/guardian of the situation and how they would like it to be handled before making a referral

Preventing peer-on-peer abuse

The EBP is committed to the prevention of peer-on-peer abuse and promoting positive, appropriate and inclusive relationships between all young people accessing our programmes in the following ways:

- robust supervision of the young people by competent staff/mentors
- comprehensive training for all staff/mentors
- fostering a culture of equality and inclusivity of all young people through mixed group interactions/activities
- robust 'codes of conduct' for all young people accessing programmes (Social Bond)
- constant review of incidents to identify trends and learn lessons for future programmes
- engagement with parents following any incident
- multi-agency working in line with the *Working Together to Safeguard Children 2018* document
- keeping up to date with Local Authority Safeguarding Policies to identify any local trends which may impact upon the safety of young people
- building 'workshops' in to programmes to increase young people's awareness in issues which may impact upon their safety and confidence to identify & manage abusive behaviour.

Appendix F - Early Help and Team Around the Child

Early Help

- 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, from the foundation through to teenage years.
- The early help offer puts the responsibility on all professionals to identify emerging problems and potential unmet needs for individual young people and families, irrespective of whether they are providing services to young people or adults. The professionals working mainly in universal services are best placed to identify young people or their families, who are at risk of poor outcomes. These will be in health services, such as health visitors, GPs and school nurses, or in Children's Centres, or in education provision at any age from early years onwards.
- The early help offer recognises the crucial role that all family members – not just mothers and fathers, but stepparents, grandparents, siblings and other extended family members and carers – play in influencing what young people experience and achieve as well as the consequences when families are in difficulty.

Early Help & NCS

It may be that a safeguarding concern highlighted on the NCS programme leads to an **Early Help Assessment** being carried out with the expressed consent of the young person concerned. This would be carried out with the support and guidance of the Safeguarding Team.

When to use the Early Help Assessment (EHA)

The EHA is a simple, easy to use assessment that captures all a young person's needs, with consent, at the earliest opportunity. To make sure that all services that support young people and families work in a co-ordinated way so that they understand and respond to young people's needs

The EHA is designed to be used when

- a practitioner is worried about how well a young person is progressing (e.g. concerns about their health, development, welfare, behaviour, progress in learning or any other aspect of their wellbeing)
- a young person, or their parent/guardian, raises a concern with a practitioner
- a young person's needs are unclear, or broader than the practitioner's service can address.

The process is entirely voluntary and informed consent is mandatory, so families do not have to engage and if they do, they can choose what information they want to share. Young people and families should not feel stigmatised by the EHA; indeed, they can ask for an EHA to be initiated.

The EHA process is not a 'referral' process but a 'request for services'.

The EHA should be offered to young people who have additional needs to those being met by universal services. The practitioner assesses needs using the EHA. The EHA is not a risk assessment.

If a young person reveals they are at risk of suffering actual or likely significant harm of abuse or neglect, the practitioner should follow the local safeguarding process immediately.