

Draft produced	Last Reviewed by	Due for review
2016	Ellis Whitham/ Trustee board/Staff Member	June 2023
Produced by	Louise Bowman	Approved by Trustees:
Michelle Hulme	June 2022	Heather Dembitz

Twins Trust Safeguarding Policies, Procedure & Guidance

Nominated safeguarding trustee lead is: Heather Dembitz

- Safeguarding update to be received at every trustee meeting.
- Trustee safeguarding lead notified of urgent concerns at the earliest opportunity between meetings.

Table of Contents

- 1 Introduction
- 2 Background
- 3 Who the policy applies to
- 4 Recruitment
- 5 Training
- 6 Procedures
 - 6.1 Responding to a Disclosure
- 7 Guidance
- 8 Monitoring Arrangements
9. Quick Tips – always raise concerns immediately
- 10 Annex 1 – Recording Form

1. Introduction

The Government's statutory guidance on safeguarding children, 'Working together to safeguard children', makes it clear that, "*Safeguarding children and protecting them from harm is everyone's responsibility. Everyone who comes into contact has a role to play*"¹

Safeguarding and promoting the welfare of children is defined in the 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; and
- taking action to enable all children to have the best outcomes.

The guidance identifies that providing 'early help' is much more effective in promoting the welfare of children than reacting later. It recognises the importance of providing support as soon as a problem emerges, at any point in a child's life.

Twins Trust is committed to safeguarding and promoting the welfare of children and vulnerable adults. This policy, procedure and guidance sets out in more detail how this will be achieved for children. There is a separate Twins Trust policy for vulnerable adults.

2. Background

A number of documents have been produced that provide guidance for organisations on safeguarding. Those detailed below have been considered when producing this document.

- Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children was published by HM Government in 2018 and provides detailed statutory guidance.
- What to do if you're worried a child is being abused: Advice for practitioners was published by HM Government in 2015.
- [Strategy for dealing with safeguarding issues in charities](#) published by the Charity Commission in December 2017. This document provides guidance for charities on safeguarding.
- A model policy, procedure and guidance approved by members of the [Hampshire Local Safeguarding Children Board](#).

3. Who the policy applies to

This policy, procedure and guidance covers young people up to the age of 18 years. There is a separate policy on safeguarding adults.

All Twins Trust staff, volunteers and trustees are expected to comply with this policy.

¹ HM Government – Working together to safeguard children, March 2015

4. Recruitment

Twins Trust will adopt the following practices to ensure safe recruitment of staff and volunteers:

Advertisement of posts and application packs should make explicit reference to the commitment of the organisation to safeguarding including:

- Compliance with Disclosure and Barring Service regulations.
- Clear statements in the job descriptions and person specifications that explicitly reference the individual's safeguarding responsibilities;
- Providing information about safeguarding policy and practices to applicants.

Prior to commencing employment or volunteering with Twins Trust:

- A comprehensive application form will need to be completed and/or CV obtained.
- Gaps in employment history should adequately explored and well understood/ explained.
- Two references should be obtained directly from referees with at least one being from the current or most recent employer.
- Referees should provide confirmation of the applicant's responsibilities. They should also be asked whether they have any concerns about the applicant that should prevent them from doing the role or whether they have been subject to any disciplinary action.

Disclosure and Barring Service (DBS) Checks

Some roles, (this will be made clear in the job descriptions and person specifications) will require prospective employees / volunteers to undergo a DBS check prior to commencing volunteering / employment.

Roles which require DBS checks will be reviewed as part of an annual safeguarding audit and review process.

5. Training

All staff and volunteers will receive a copy of the Twins Trust Safeguarding Children Policy, Procedure and Guidance as part of their induction.

All Twins Trust staff and volunteers will complete safeguarding training that has been deemed the appropriate level for their role. An annual safeguarding risk assessment determines the level and frequency of training required for each role.

Two levels of safeguarding training have been identified and all Twins Trust staff and volunteer roles will receive training based on level determined necessary and appropriate for the role.

- Level 1 – An introduction to safeguarding to be completed by all staff and volunteers including trustees
- Level 2 – Comprehensive Safeguarding Training completed by our Early Years Practitioners through Norland College

The staff team will monitor attendance at / completion of safeguarding training to ensure compliance with this policy.

Volunteers may not need to complete safeguarding training if they have up to date safeguarding training (within last 6 months) as part of paid employment and/or another volunteering role. However, evidence that they have attended / completed sufficient training will need to be provided. E.g. a certificate showing attendance / completion.

6. Procedures

Everybody shares responsibility for safeguarding children by identifying children or young people who may be at risk and alerting the appropriate service(s).

All staff and volunteers must ensure that they are familiar with safeguarding procedures for their setting and which staff member is responsible for child protection issues.

Advice should be sought in the first instance from the designated or named person (**Louise Bowman 07957281466**, deputised by **Helen Regan 07715113203**) responsible for child protection.

However, this should not preclude a direct referral to Children's Social and/or the local police force particularly if there is any element of immediate risk. If there is a concern about Louise Bowman or Helen Regan, then please contact the chair of trustees Krista Pound 07789926769.

Referrals must always be made to Children's Social Care, at Hantsdirect (telephone 0300 5551384) if there are signs that a child under the age of 18 years, or an unborn baby:

- Is suffering or has suffered abuse and/or neglect.
- Is likely to suffer abuse and/or neglect.
- Would be likely to benefit from family support services (with agreement)

Louise Bowman or Helen Regan will support you in contacting Children's Social Care, at Hantsdirect (telephone 0300 5551384) to make a referral. They are familiar with the procedure and will be able to advise you accordingly. The timing of referrals must reflect the perceived risk, and should normally be within one working day of recognition. If, for any reason, you cannot contact Louise Bowman or Helen Regan you should go ahead and contact Children's Social Care.

When a referral is made to Children's Social Care you must agree with them what the child and parents / carers will be told, by whom and when. Do not just leave messages. Always speak to someone. You must confirm verbal and telephone referrals in writing, within 48 hours.

Sometimes you will be asked to use a multi-agency referral form that can be found at: <https://www.hampshirescp.org.uk/report-a-concern/>

Should you not have had a response within 3 working days, contact them again.

Under no circumstances should you speak to, or confront, the abuser. Do not share suspicions or information with any other person other than your line manager, Children's Social Care and the Police. Information given to Children's Social Care or the Police will be taken seriously, handled sensitively and shared only on a 'need to know' basis, wholly to protect the child. However, in order to ensure that children are safeguarded on the basis of proper evidence, the source of the referral cannot be kept anonymous

If you have any concerns about an adult's behaviour towards children or young people (who is not an employee or volunteer working for Twins Trust):-

- Do not ignore it – the service will take any concerns very seriously.
- You must discuss your concerns with Louise Bowman or Helen Regan, who will support you in liaising with the statutory agencies should any child protection matter arise.
- Do not confront the adult but seek the advice of Louise Bowman or Helen Regan. If they are not available seek advice from your line manager or from Children's Social Care.

Definitions of abuse as contained in Working Together 2017 include

Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Physical abuse: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child 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 child 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 being imposed on children. These may include interactions that are beyond a child's developmental 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse: Involves forcing or enticing a child or young person 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.

Child sexual exploitation: Child sexual exploitation is a form of child sexual abuse. It occurs where 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.

Neglect: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- a. provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- b. protect a child from physical and emotional harm or danger
- c. ensure adequate supervision (including the use of inadequate caregivers)
- d. ensure access to appropriate medical care or treatment

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

Extremism: Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

Signs of abuse are listed at <https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>

6.1 Responding to a Disclosure

If a child tells you that they, or someone they know, is being abused:

- Listen to what the child is saying and take it seriously.

- Reassure the child who has made the disclosure that they have done the right thing.
- Give the child time to talk and do not probe or ask leading questions. Investigation is not your responsibility.
- Do not promise to keep secrets. All allegations of harm or potential harm must be acted upon.
- Explain to the child that you will share this information with a senior member of staff who will ensure the appropriate procedures will be followed.
- E-mails or text messages received detailing details of suspected abuse should be responded to as soon as possible or within 24 hours by contacting the child by phone or face-to-face to obtain further information.
- Record the event in accordance with Twins Trust's procedures. – stated in the policy. These records should be stored in accordance with our data protection policy.
- All allegations against staff, even those that appear less serious, need to be followed up and examined objectively by someone independent of the organisation concerned. All allegations will be considered by the Local Authority Designated Officer, who acts for the LSCB agencies to monitor allegations and ensure that the actions in response to the allegation are in accordance with the Hampshire Safeguarding Board Procedures.
- Advice on the storage of all documentation must be sought from your line manager who must ensure that access is strictly limited to relevant staff and external professionals on a need to know basis in accordance with our data privacy policy.
- On our website, the introduction to our privacy policy explicitly confirms we will escalate safeguarding concerns to other agencies without obtaining first obtain permissions.

6.2 Dealing with allegations or concerns against any employee or volunteer working for Twins Trust

Concerns for the safety and well-being of children could arise in a number of different ways and in a range of settings. It is essential to act quickly and effectively if an allegation is made or if there is suspicion or concern about a professional or volunteer's relationship with a child, young person or group of children/young people, particularly if they have:

- Behaved in a way that has harmed, or may have harmed, a child;
- Possibly committed a criminal offence against or related to, a child; or
- Behaved towards a child or children in a way that indicates she/he is unsuitable to work with children.

If an allegation is made, or a concern arises, about a member of staff or volunteer, ensure that Louise Bowman is informed immediately. How concerns about staff conduct are investigated are outlined in the staff handbook. How concerns about volunteers are investigated is covered in the volunteer policy. Whilst these procedures guide our approach, if the allegation is of sufficient concern or there is an immediate risk then Louise Bowman will contact the Local Authority Designated Officer (LADO) (telephone 01962 876364).

The LADO is available to provide advice or support in any allegations process, including advising whether or not immediate suspension of the person concerned should be considered.

Senior Managers must ensure that HR Advisors are made aware of concerns and that HR advice is sought at the earliest opportunity. If the LADO is unavailable, or the concern is raised out of hours, you should contact Hantsdirect or the out of hours service or, in an emergency, the police.

Records should be secured and information sharing should be strictly limited to relevant staff and external professionals on a need to know basis. The member of staff or volunteer should be treated fairly and honestly, helped to understand the concerns expressed, the process being followed and any outcomes of the process.

Senior managers should seek advice from the LADO and Social Care/Police before informing the person who is subject to an allegation.

Disclosure and barring service (DBS)

We carry out DBS checks in accordance with our annual role risk assessments. We will also report safeguarding concerns to the relevant agencies as outlined earlier in this policy. In discussion with these agencies, we would report concerns directly to the DBS too.

7. Expected Conduct

7.1 Staff Conduct – Safe Working Practice

It is essential that all staff are conscious of how they should conduct themselves to minimise the risk of finding themselves as the subject of any child protection processes. All staff should be aware of the following summary of things to do and not to do when working with children.

“Do”

- Read and follow the child protection procedures.
- Report to the designated / named person any concerns about child welfare/safety.
- Report to the designated / named person any concerns about the conduct of other school staff/volunteers/contractors.
- Record in writing all relevant incidents.
- Work in an open and transparent way.
- Discuss and report any incidents of concern or that might lead to concerns being raised about your conduct towards a child.
- Dress appropriately for your role.
- Only use e-mail contact with children via any authorised system.
- Avoid unnecessary physical contact with children.
- Where physical contact is essential for educational or safety reasons, gain the child’s permission for that contact wherever possible
- Allow children to change clothes with levels of respect and privacy appropriate to their age, gender, culture and circumstances.
- Avoid working in one-to-one situations with children.

- Avoid volunteering to accommodate children overnight.
- Be careful about recording images of children and do this only when it is an approved activity.
- Contact your professional association or trade union if you are the subject of concerns or allegations of a child protection nature.
- Fully co-operate with any investigation into child protection issues at your setting.
- Listen to children when they express concern (rumours) about staff which might appear to be just, and check facts v fiction.

“Don’t”

- Take any action that would lead a reasonable person to question your motivation and/or intentions.
- Misuse in any way your position of power and influence over children.
- Use any confidential information about a child to intimidate, humiliate or embarrass a child.
- Engage in activities out of the workplace/setting that might compromise your position with children or young people.
- Establish or seek to establish social contact with children outside of the setting.
- Accept regular gifts from children.
- Give personal gifts to children.
- Communicate with children in inappropriate ways, including social networking and mobile telephones.
- Pass your home address, phone number, e-mail address or other personal details to children.
- Make physical contact secretive.
- Meet with children in closed rooms without other staff being aware
- Use physical punishment of any kind.
- Confer special attention on one child unless this is part of an agreed plan or policy.
- Transport children in your own vehicle without prior management approval.
- Take, publish or share images of children or other children without their parents’ permission.
- Abuse your position of trust with children
- Allow boundaries to be unsafe in more informal settings such as trips out.

8. Monitoring Arrangements

This policy and procedure will be reviewed annually. There will also be an annual safeguarding audit, which includes:

- Undertaking safeguarding risk assessments for all staff and volunteer roles to determine the frequency and level of training required, and the frequency and level of DBS check needed.
- Safeguarding case reviews for all those lodged throughout the year and confirmation that all improvements to policies or procedures have been fully implemented

- Consideration of internal, and external factors that may have made safeguarding risks worse, or better, or a change in the level of need amongst our beneficiaries, or pressures on our staff and volunteers (e.g. COVID19 survey results – mental health concerns)
- Training reviews to confirm that everyone has completed their training and the sessions are still appropriate to the risks identified (this is recorded in our safeguarding training tracker and risk assessment now documented on NOVA)
- DBS reviews
- Recruitment of staff and volunteer reviews
- Reviewing webpages, and emails to highlight how to; raise concerns and complaints; to access an interpreter; receive support for hearing/visual impaired or other disabilities.
- Reviewing follow ups and asking for feedback from service users.
- Confirming who is always on hand to listen to concerns for volunteers (currently in place but looking to share the load)
- Highlighting NSPCC helpline for staff and volunteers to talk through concerns <https://www.nspcc.org.uk/keeping-children-safe/our-services/nspcc-helpline/>

Quick Tips

If you have a concern, or question, or need to speak to someone about a difficult case please contact **Louise Bowman**, Co-Head Family Support and Resources, on **07957281466**

Regardless of the day of the week, or time of the day. Please don't delay.

Alternatively contact **Helen Regan**, Co-Head Family Support and Resources, on **07715113203**

Useful Telephone Numbers:

Children's Social Care - HantsDirect 0300 5551384

Children's Social Care (out of hours) 0300 555 1378

Local Authority Designated Officer 01962 876364

Local Police Force Non-emergency number 101

Local Police Force Emergency Number 999

Hampshire Police 0845 045 45 45

NSPCC Child Protection Helpline 0808 800 5000

Child-Line 0800 1111

10. Annex 1 – Model Recording Form

Child's Name:

Date of Birth:

Date:

Name & title of person raising concern:

Name:

Designation:

Copied to:

Details of concern

Action taken

(Has a referral to Children's Social Care been considered?)

Outcome of action

Further actions required

By whom and when

Review Date

Name and signature of person completing entry