

## **CHILD PROTECTION & SAFEGUARDING**

**The named person at My Choice School Oak House who acts as DSL in all Child Protection/ Safeguarding issues:**

**DSL:**

**REGISTERED CARE MANAGER Declan Lola 01424 434760**

**DDSL:**

**DEPUTY CARE MANAGER Tygorah Smith 01424 434760**

**DEPUTY CARE MANAGER Hayley Harding 01424 434760**

**The DSL is also referred to as the DSO for the children's home.**

**Also supporting the DSL and DDSL:**

**Dawn Ives – Director/ RI 01444 446920**

**Debbie Woodgate- Operations Manager- 01444 446920**

**Annie Murphy, Head of Education 01444 446920**

**The lead for each home is the registered care manager:**

<b>Kestrel House</b>	<b>Polly Bayne</b>
<b>Maple House</b>	<b>Chris Martin</b>
<b>Ocean Pearl</b>	<b>Tom Chilton</b>
<b>Pebble House</b>	<b>Michelle Allen</b>
<b>Ivy Cottage</b>	<b>Stuart Halsey</b>
<b>Kingfisher View</b>	<b>Cian Hughes</b>
<b>Oak House</b>	<b>Declan Lola</b>
<b>Osprey House</b>	<b>Bethany Gudgeon</b>
<b>Neptune House</b>	<b>Theo Barclay</b>

### **The role of the DSL**

The DSL is expected to:

- refer cases of suspected abuse to the local authority children's social care as required
- support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required

- support staff who make referrals to the Channel programme
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- refer cases where a crime may have been committed to the Police as required.

In working together the DSL is expected to:

- act as a point of contact with the three safeguarding partners
- liaise with the Head of Education to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- as required, liaise with the “case manager” and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
- liaise with staff (teachers and TAs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- act as a source of support, advice and expertise for all staff.

## **POLICY**

The following policy and procedures are to be adhered to in My Choice School. It is mandatory that all staff have a clear understanding of the content to ensure the policy is followed relating to a Child Protection or Safeguarding incident. This policy is to be used alongside the Sussex Child Protection and Safeguarding Procedures. This is an on-line document. To review this live document all staff have access via the homes computer desktops where there is a shortcut link, or access via the West Sussex County Council website, [www.westsussex.gov.uk](http://www.westsussex.gov.uk). These procedures cover our West and East Sussex homes. Surrey have their own Safeguarding Children Procedures Manual, again which can be reviewed on-line via their website: [www.surreycc.gov.uk](http://www.surreycc.gov.uk). The on-line manual is regularly updated on a planned basis twice yearly. The manual contains the Sussex Children Protection and Safeguarding Procedure which covers the areas served by Brighton & Hove, East and West Sussex Safeguarding Boards. The on-line manual has replaced the red Child Protection files and books Volume 1 & Volume 2.

The policy is written in line with the Children’s Homes Regulations and Guide (2018) and DfE statutory guidance Keeping Children Safe in Education (July 2021).

The duties and responsibilities of local authorities and others who deliver children’s services to safeguard children are set out in the statutory

guidance Working Together to Safeguard Children 2018 and the Shared South West Child Protection Procedures.

The specific responsibilities of any young person's social worker (where applicable), acting on behalf of the placing authority, for safeguarding LAC are set out in the Children's Act 1989.

The Headteacher and Registered Managers of our Children's Homes should seek to involve the local authority and other relevant people whenever there is a serious concern about a young person's welfare. In our My Choice Children's Homes the Registered Manager is required by regulation 40 to notify placing authorities, Ofsted and other relevant people about serious events.

### **Safeguarding and Promoting Children's Welfare**

The My Choice School policy defines safeguarding and promoting the welfare of children as:

- Protecting children from maltreatment;
- Preventing impairment of children's mental and physical 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.

### **Child Protection**

Child protection is part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering or are at risk of suffering significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However all agencies and individuals should aim proactively to safeguard and promote welfare of children so that the need for action to protect children from harm is reduced.

The policy reflects current legislation, government statutory guidance and expectations, and accepted best practice. Staff must be familiar with and access the policy online.

We are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

Our students are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad

and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it through, for example:

- Assemblies exploring risks to self, safeguarding and online safety, and other topics following the PSHE Association suggested assemblies.
- Our curriculum of PSHE, SRE, Beliefs and values and Citizenship
- Annual Safer internet Week and Anti Bullying Week

We assess the risks and issues in the wider community when consider the well-being and safety of our students, when at school and on educational visits.

All school staff, teachers and RSWs must undertake Safeguarding training prior to commencing their work at My Choice; this is carried out during their induction through Educare e-Learning and the training covers:

- Serious Youth Violence (CCE)
- An introduction to CSE
- The Prevent Duty
- Preventing bullying
- Child Protection in education
- Health and safety in education
- Fire safety in education
- On line safety

All teachers and RSWs that commence work at My Choice will have records kept of their induction training. Safeguarding knowledge is questioned in the interview process and any gaps in knowledge are identified and addressed during the induction and in further training.

All staff are then booked to attend the My Choice Safeguarding training within their first 6 months of employment and this is updated annually as a minimum.

The Head of Education, Headteacher and Care Manager also complete the L3 DSL training. The West Sussex Working together to Safeguard Children Training, is also accessed.

All school staff are expected to complete a Safeguarding Competency Questionnaire at minimum annually, this informs additional training and safeguarding is an agenda item on every team meeting.

In addition, DfE statutory guidance Keeping Children Safe in Education (guidance for schools and colleges and information for all school and college staff) July 2021 places the following responsibilities:

- Everyone who comes into contact with children and their families has a role to play in safeguarding children.
- Each school should have a safeguarding lead (designated officer) who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with childrens' services.
- The Teacher Standards 2012 state that teachers, including Headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- All school staff have a responsibility to provide a safe environment in which children can learn.
- All staff members should receive appropriate child protection training which is regularly updated.
- All staff members should be aware of systems within their school which support safeguarding and these should be explained to them as part of staff induction.
- All school staff should beware of the signs of abuse and neglect so they are able to identify children who need protection
- All staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned

## **Shared Beliefs**

The needs of the child are paramount and should underpin all child protection work and resolve any conflicts of interests. All children deserve the opportunity to achieve their full potential. All children have the right to be safeguarded from harm and exploitation whatever their;

- Race, religion, first language or ethnicity
- Gender or sexuality
- Age
- Health or disability
- Location or placement
- Any criminal behaviour
- Political or immigration status

Responsibility for the protection of children must be shared because children are safeguarded only when all relevant agencies and individuals accept responsibility and co- operate with one another.

Statements about or, allegations of abuse, or neglect made by children, must always be taken seriously. The wishes and feelings of children are vital elements in assessing risk and formulating protection plans, and must always be sought and given weight according to the level of understanding of the child.

The procedure contains guidance as to what action is to be taken when a child or young person has been or has alleged to have been abused or is at risk of abuse.

The procedure gives general principles that must be followed in all cases and goes on to cover three possible scenarios that may need a different approach by staff.

These are as follows:

- Abuse of young people by staff
- Abuse of young people by other young people
- Abuse of young people by members of their family, or by others outside the home.
- Principles underpinning all work to safeguard and promote the welfare of children.

## General Principles

1. In all cases the first priority is the welfare of the child or young person.
2. Their safety must be secured and any emergency treatment sought immediately. This may involve taking the young person to a local A & E or contacting the GP direct.
3. The young person will need to be reassured and comforted in a sensitive way. Staff need to be available, documenting all concerns and passing on to the Care Manager.
4. All matters relating to actual or suspected abuse must be carefully and fully documented in line with this policy and company child protection training. The information needs to be recorded as soon as possible after the event has occurred. All recording must be signed and dated if recorded by hand and passed to the DSL.
5. Staff should not deal with Child Protection and Safeguarding issues alone, consultation with the Care Manager and Director / RI must be sought at the earliest possible opportunity. They in turn will inform the Head of Education.
5. All staff have a professional duty to protect the children and young people we work with from harm. This duty is greater than any loyalties to colleagues or the student's families.
6. Matters relating to Child Protection and Safeguarding should be dealt with as privately as possible but **confidentiality cannot and must not be promised to a young person.** Promises that cannot be kept, should not be made. Staff must not ask questions during a disclosure or child protection issue. It is not for My Choice staff to question or investigate this could hinder potential or future section 47 investigations. To question or investigate is not company policy.
7. The prevention of abuse is the best strategy and good practice is about preventing abuse. The school will be a safe place if all staff communicate effectively, record information well and have clearly defined boundaries within their professional relationships with the young people. An atmosphere where students feel confident about taking their problems to staff is one that promotes safety.
8. Our students should have access to support outside of My Choice School, such as Childline, and we provide access to telephone numbers of support services.

9. It is our responsibility to work in partnership with parents / carers and this must be maintained throughout all our work. There is an assumption that parents should know of significant events in their children's lives and be involved in meetings and decisions relating to the young person should a Child Protection and Safeguarding issue arise. Social Workers for young people are the key person in deciding the extent and appropriateness of parental involvement.
10. It is important to note that a staff member may be gathering evidence in listening to a child or young person's disclosure. Child Protection and Safeguarding incidents can often lead to court proceedings. Remain factual in all recordings
11. It is important to be aware that when informing the social worker of a Child Protection issue, the DSL OR DDSL must not assume it will be passed to MASH. My Choice School has a responsibility to pass concerns, observations, disclosures to the local child protection team and follow up the outcome.
12. If students are resident in our homes then all child protection referrals need to be passed to Ofsted via a Notification of Event form (NOE). The **Care Manager** or **Senior Management only** complete these forms.
13. The child protection and safeguarding policy will be reviewed at minimum annually, however any amendments following update in legislation or regulation or improved practice will be immediate.

## **Definitions of Abuse**

In dealing with actual, suspected, or risk of abuse, staff need to understand what constitutes abuse and the categories used to define it. The signs and symptoms of each category are discussed within the Child Protection training.

Child abuse and neglect is a generic term encompassing all ill treatment of children including serious physical and sexual assaults, as well as cases where the standard of care does not adequately support the child's health or development.

Abuse and neglect are forms of maltreatment of a child. Somebody may cause or neglect a child by inflicting harm, or failing to act to prevent harm. Children may be abused in a family, or in an institutional or community setting; by those known to them or by a stranger. They may be abused by an adult or adults or another child or children.

'Working Together to Safeguard Children' (March 2018) sets out definitions and examples of the broad categories of abuse which are used for the purpose of recognition;

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse
- Impairment to mental and physical health and development

These categories overlap and an abused child does frequently suffer more than one type of abuse. This policy provides definitions of these categories and information to help identify potential abuse and neglect and the required response.

All staff must be aware that abuse can take other forms and may be considered to be cultural in origin; this includes FGM, forced marriage and honour based abuse.

All staff must also be aware of the potential for Child Sexual Exploitation.

### **Neglect:**

Neglect is 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 and development.

Neglect may involve a parent or carer:

- Failing to provide adequate food and clothing, shelter (including exclusion from home or abandonment)
- Failing to protect a child from physical and emotional harm or danger
- Failing to ensure adequate supervision including the use of inadequate care-takers
- Failing to access appropriate medical care or treatment
- Failing to meet at child's basic emotional needs.

Severe neglect of young children is associated with major impairment of growth and intellectual development.

Persistent neglect can lead to serious impairment of health and development, long-term difficulties with social functioning, relationships and educational progress.

Neglect can also result, in extreme cases, in death.

Evidence is built up over a period of time and can cover different aspects of parenting.

### **Physical Injury:**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

It may also be caused when a parent or carer fabricated the symptoms of, or deliberately induces illness in a child. This unusual and potentially dangerous form of abuse is described as fabricated or induced illness in a child. This rare and potentially dangerous form of abuse has also been known as Munchausen Syndrome by proxy. More details about the condition is in section 8.9 of the Sussex child protection and safeguarding procedures.

### **Sexual Abuse:**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution whether or not the child is aware of what is happening. The activities may involve physical contact including penetrative or non- penetrative acts. They may also include non-contact activities, such as involving children looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

### **Emotional Abuse:**

Emotional abuse is the persistent emotional ill treatment 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 s/he is worthless or unloved, inadequate, or valued only insofar as s/he meets the needs of another person.
- Feature age or developmentally inappropriate expectations being imposed on children. This includes interactions beyond the child's developmental capability, as well as over protection and limitation of exploration and learning, or preventing the child's participating in normal social interaction
- Involve seeing and hearing the ill treatment if another
- Involve serious 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 most types of ill treatment of a child, though emotional abuse may occur alone.

## **Mental Health**

All staff must be aware that mental health problems can be an indication that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- All staff are well placed to make observations of children's behaviour and identify those whose behaviour indicates that they may be experiencing a mental health problem or be at risk of developing a mental health problem.
- Only appropriately trained professionals should attempt a diagnosis of a mental health problem.
- When children have suffered abuse, neglect or other traumatic events this will have a lasting impact on their lives through childhood, adolescence and adulthood. Staff must be aware of how these experiences impact on mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern then immediate action should be taken in reporting to the DSL / DDSL.

## **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.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs / alcohol
- Inappropriate sexualised behaviour for age / sexually transmitted infections
- Evidence of/suspicions of physical or sexual assault

- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being.

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Sexual identity.

More information can be found in: Child Sexual Exploitation: Definition and a guide for practitioners (DfE 2017)

[Department for Education \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/617207/Child_Sexual_Exploitation_Definition_and_a_guide_for_practitioners.pdf)

### **Safeguarding against FGM**

Female Genital Mutilation comprises all procedures involving partial 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.

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE

- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

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

FGM has been classified by the World Health Organization into four types:

**Type 1** – Clitoridectomy: partial or total removal of the clitoris (a small, sensitive and erectile part of the female genitals) and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris).

**Type 2** – Excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the 'lips' that surround the vagina).

**Type 3** – Infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris.

**Type 4** – Other: all other harmful procedures to the female genitalia for non-medical purposes, e.g. pricking, piercing, incising, scraping and cauterising the genital area.

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

FGM is not an issue that can be decided on by personal preference – it is an illegal, extremely harmful practice and a form of child abuse and violence against women and girls. Organisations will have local safeguarding protocols and procedures for helping children and young people who are at risk of or facing abuse. These should include multiagency policies and procedures, consistent with those developed by their Local MASH.

It must always be remembered that fears of being branded 'racist' or 'discriminatory' must never weaken the protection that professionals are obliged to provide to protect vulnerable girls and women.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from

a disclosure (unlike in the medical profession where an observation may have been made). Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care.

One specific consideration when putting in place safeguarding measures against FGM is that the potential risk to a girl born in the UK can usually be identified at birth, because through the antenatal care and delivery of the child, NHS professionals can and should have identified that the mother has had FGM. However, FGM can be carried out at any age throughout childhood, meaning that identifying FGM at birth can have the consequence that any safeguarding measures adopted may have to be in place for more than 15 years over the course of the girl's childhood.

This is a significantly different timescale and profile compared with many of the other forms of harm against which the safeguarding framework provides protection.

### **Symptoms of FGM**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from a classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear
  - talking about pain or discomfort between her legs

For further information please refer to the FGM safeguarding and Risk Assessment January 2017

[FGM Professional Guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

## **The offence of Forced Marriage**

A Forced Marriage (FM) is a marriage conducted without the valid consent of one or both parties and where duress is a factor. FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014. Prior to the introduction of this offence, prosecutors dealt with FM cases using existing legislation such as false imprisonment, kidnapping and offences of violence.

*Reference: HO Forced Marriage June 2015*

## **Criminalisation of a breach of a FM Protection Order**

A Forced Marriage Protection Order (FMPO) is a civil remedy issued under the FM (Civil Protection) Act 2007. It offers protection to a victim from all civil or religious ceremonies, by forbidding the respondent(s) themselves, or by encouraging or agreeing with any person whatsoever, from entering into any agreements in relation to the engagement or matrimony. A FMPO may contain such prohibitions, restrictions or requirements and any other such terms as the court considers appropriate for the purposes of the order. An application for a FMPO can be made by a victim, a person obtaining the court's permission to apply for an order on behalf of the victim, a relevant third party or by the court of its own volition.

Breach of a FMPO is now a criminal offence under s120 of the Anti-Social Behaviour, Crime and Policing Act 2014 which came into force on 16 June 2014.

Prosecutors should note that a breach of a FMPO can be referred to the CPS by the police if a victim reports it in the first instance. A breach of a FMPO should be treated in the same way as a prosecution of any other breach of an order for example, a breach of a non-molestation order.

### **Honour based abuse**

There is no specific offence of "honour based crime". It is an umbrella term to encompass various offences covered by existing legislation.

Honour based abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and / or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the DSL or DDSL as a matter of urgency.

HBA can also be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and / or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and / or community by breaking their honour code.

It is a violation of human rights and may be a form of domestic and / or sexual violence. There is no, and cannot be, honour or justification for abusing the human rights of others.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

## **Child Criminal Exploitation**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child (or vulnerable adult) into any criminal activity

- (a) in exchange for something the victim needs or wants, and / or
- (b) for the financial or other advantage of the perpetrator or facilitator and / or
- (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late and
- children who regularly miss school or education or do not take part in education.

## **County Lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin but not exclusively) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

Like other forms of abuse, county lines exploitation:

- Can affect male or female young people under the age of 18years
- Can affect any male or female vulnerable adult over the age of 18years
- Can still be exploitation if the activity appears consensual
- Can involve force and / or enticement based methods of compliance and is often accompanied by violence or threats of violence
- Can be perpetrated by individuals or groups, males or females, young people or adults
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. While age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

## **Domestic abuse**

Domestic abuse is any pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those age 16 or over who have been, or who are, intimate partners or family members regardless of gender or sexuality. The abuse can include but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Exposure to domestic abuse or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child or young person may blame themselves for the abuse or may have had to leave the family home as a result.

Domestic abuse can also have implications for **homelessness**, which carries safeguarding implications for children and young people who are insecurely housed or at risk of homelessness with their families or 16 and 17year olds who are living independently from their parents or guardians.

## **Peer on peer abuse**

All staff should recognise that children and young people are capable of abusing their peers and staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse.

All staff should recognise that abuse is abuse and should not be tolerated or passed off as 'banter', 'just having a laugh', or 'part of growing up'.

This is most likely to include, but not limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- gender-based violence
- sexting (also known as youth produced sexual imagery)
- Upskirting (taking photographs up a victim's skirt without their knowledge or permission)
- initiation-type violence and rituals

Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched / assaulted or boys being subject to initiation-type violence. My Choice School believes that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Management Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found:

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

At My Choice School we will support the victims of peer on peer abuse by

- Ensuring victims views have been heard and they feel safe and listened to
- Writing a safety plan and reviewing risk assessments ensuring that appropriate targeted work for students is identified and implemented
- Providing victims with daily check ins with trusted staff
- Ensuring the school has effective systems for students to raise concerns with staff
- Ensure a whole school approach is implemented to reduce impact on others and reduce further risk, delivering through our curriculum, particularly assemblies and PSHE lessons

In cases of sexting or other youth produced sexual imagery we follow guidance given to schools and colleges by the **UK Council for Child Internet Safety (UKCCIS) 2017 - Sexting in schools and colleges, responding to incidents, and safeguarding young people.**

- Report it to the DSL or DDSL immediately
- Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal
- If you have already viewed the imagery by accident (eg if a young person has showed it to you before you could ask them not to), report this to the DSL
- Do not delete the imagery or ask the young person to delete it
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL
- Do not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents / carers
- Do not say or do anything to blame or shame any young people involved
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL

My Choice School has an Acceptable User Agreement that all students and staff must follow and mobile phones or devices are not permitted during the school day.

The management and inclusion of children with sexually harmful behaviour is complex and My Choice School will work with professionals and TAC to ensure the safety of other children. Children who present with sexually harmful behaviour or sexualised behaviours or language may be victims themselves.

Staff who are concerned about a child's sexualised behaviour must follow Safeguarding procedures and be aware that a response under Safeguarding procedures is an appropriate response.

## **Children Missing in Education**

My Choice School recognises that many of our students have difficulties sustaining regular school attendance. We also recognise that it may be an accepted and expected characteristic of CLA and young people with SEMH needs that they do not attend school regularly and that they may regularly go missing from their home. We ensure that this is flagged as a concern, followed up and we do not respond with complacency. We monitor attendance carefully and address poor or irregular attendance without delay.

Children missing in education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation and becoming NEET or criminalised.

Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We will always follow up with parents / carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents / carers. Parents should remember to update the school as soon as possible if the numbers change.

The DSL or DDSL will advise school staff daily before school starts to ascertain that students are attending, to carry out a welfare check or to ascertain why a student may not be attending. This is part of the daily handover. This daily handover takes place within the children's home and we do not have to monitor travel to school.

Students who attend additional provisions such as college also have their attendance verified by their teacher.

Students who are engaged in Remote Learning must have telephone or TEAMS welfare checks by their teacher; the parent and student must be spoken to daily.

We will ensure that young people who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a student leaves the school, we will record the name of the student's new school and their expected start date.

My Choice School Head of Education will record in the admissions register the destination of any student removed from roll. Where a student is removed from roll (such as CLA who have a change of care provision) and do not have a named destination school, then the DSL will follow this up with their professional network (social worker, SEND teams, Virtual Schools) or parent / carer to confirm the next destination. Where this cannot be confirmed the DSL will complete a CME referral.

My Choice School will monitor attendance daily and report any prolonged non attendance as a safeguarding concern especially if the cause is unknown and contact cannot be made with parents / carers.

My Choice School will work with parents / carers and social workers to identify ways to support children who are missing in education regularly.

### **Private fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone **other than** a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school.

My Choice School will ensure that the legal status and care arrangements of the student are recorded on the school admissions form prior to the student commencing at our school and ensure we are clear about the relationship of the adults to the child who is being admitted. School staff should notify the DSL or DDSL when they become aware of private fostering arrangements. The DSL or DDSL will speak to the family of the child involved to check that they are aware of their duty to inform the local authority.

My Choice School has a duty to inform the local authority of the private fostering arrangements.

### **Children with SEND**

Children with SEN and disabilities can face additional challenges in safeguarding; they have increased vulnerability and as such additional barriers can exist that would affect the recognition of abuse and neglect in this group of children.

- There may be assumptions that indicators of abuse such as behaviour, mood, injury are related to the child's disability and not lead to further exploration.
- Children with SEN and disabilities are more prone to peer group isolation than other children.
- The potential for children with SEN and disabilities to be disproportionately impacted by bullying without showing any signs
- There may be communication barriers and difficulties in overcoming these barriers

My Choice School will be vigilant to all of our students with SEND and complex needs, including communication needs, and will ensure that a robust level of support, care and supervision is in place to keep them safe.

## **PROCEDURE**

The **DSL** is the Registered Care Manager Declan Lola.

The **DDSL** are the Deputy Care Managers Tygorah Smith and Hayley Harding.

The DSL is supported by the Head of Education, Annie Murphy (for students on roll at My Choice School) ; the Director / RI, Dawn Ives; Operations Manager, Debbie Woodgate.  
Also supporting are the Team Managers Ed Glaves and Pauline Gunnell.

The DSOs for the children's homes are the Care Managers:

<b>Kestrel House</b>	<b>Polly Bayne</b>
<b>Maple House</b>	<b>Chris Martin</b>
<b>Ocean Pearl</b>	<b>Tom Chilton</b>
<b>Pebble House</b>	<b>Michelle Allen</b>
<b>Ivy Cottage</b>	<b>Stuart Halsey</b>

<b>Kingfisher View</b>	<b>Cian Hughes</b>
<b>Oak House</b>	<b>Declan Lola</b>
<b>Osprey House</b>	<b>Bethany Gudgeon</b>
<b>Neptune House</b>	<b>Theo Barclay</b>

The My Choice Children's Homes Ltd Senior Management Team (Director/RI, Operations Manager, Head of Education, Team Managers) support all Child Protection and Safeguarding issues and concerns, and support all referrals where required.

In all cases the staff member needs to inform the **DSL** (Care Manager) if there are Child Protection and Safeguarding concerns, observations, or disclosures etc. The DSL will notify the DDSL Deputy Care Managers and the Head of Education.

The Care Manager will inform the Director / RI and the Operations Manager.

My Choice School uses CPOMS to record all Safeguarding concerns, Cause for Concerns, Incidents and Physical Interventions however at My Choice School Oak House preference is given to the children's home recording system in order to reduce the risk of duplication or missed communication. My Choice Children's Homes uses **ClearCare** for recording all Cause for Concerns, Incidents and Physical Interventions.

All children's home staff have access to ClearCare for recording and have responsibility for recording, the Head of Education has access to the reports for all young people at My Choice.

Cause for Concerns are recorded on ClearCare in all cases where a staff member is concerned for the well being of the young person; these may be comments made, actions or any issue that does not meet a threshold for safeguarding referral or for incident reports.

Hardcopy Cause for Concern forms are also available in the Safeguarding folder and as word documents on the My Choice School Sharepoint site. These can be completed in the event of system failure and can be transferred or uploaded to the ClearCare.

Safeguarding referrals are made via email by the DSL or the DDSL.

Child Protection and Safeguarding matters in an **emergency** are always dealt with by **MASH** - or the Local Police Child Protection and

Safeguarding Team. The young person's Social Worker will be notified by the DSL or the DDSL.

## Social Service Child Protection and Safeguarding Contact Details:

Home	Location / email	Address	Telephone
Kestral House	MASH All CP referrals West Sussex  <a href="https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/">https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/</a>	The West Sussex Social services Switch board till 5pm. (Calls here will get diverted to the relevant child protection team / area).	01403 229900
		Out of hours child protection line	0330 2226664
Maple House	MASH All CP referrals West Sussex  <a href="https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/">https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/</a>	The West Sussex Social services Switch board till 5pm. (calls here will get diverted to the relevant child protection team / area)	01403 229900
		Out of hours child protection line	0330 2226664
Ocean Pearl	MASH All CP referrals West Sussex  <a href="https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/">https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/</a>	The West Sussex Social services Switch board till 5pm. (calls here will get diverted to the relevant child protection team / area)	01403 229900
		Out of hours child protection line	0330 2226664
Pebble House	MASH All CP referrals West Sussex  <a href="https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/">https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/</a>	The West Sussex Social services Switch board till 5pm. (calls here will get diverted to the relevant child protection team / area)	01403 229900
		Out of hours child protection line	0330 2226664

Osprey House	MASH All CP referrals Surrey <a href="mailto:mash@surreycc.gov.uk">mash@surreycc.gov.uk</a>	The Surrey Social services Switch board till 5pm. (calls here will get diverted to the relevant child protection team / area)	0300 470 9100
		Out of hours child protection line	01483 517 898
Kingfisher View	MASH All CP referrals West Sussex <a href="https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/">https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/</a>	The West Sussex Social services Switch board till 5pm. (calls here will get diverted to the relevant child protection team / area)	01403 229900
		Out of hours child protection line	0330 2226664
Oak House	EAST SUSSEX All CP referrals East Sussex  0-19 <a href="mailto:SPOA@eastsussex.gov.uk">SPOA@eastsussex.gov.uk</a>	The East Sussex Social services Switch board till 5pm. (calls here will get diverted to the relevant child protection team / area)	01323 464 222
		Out of hours child protection line	01273 335906 01273 335905
Ivy Cottage	MASH All CP referrals West Sussex <a href="https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/">https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/</a>	The West Sussex Social services Switch board till 5pm. (calls here will get diverted to the relevant child protection team / area)	01403 229900
		Out of hours child protection line	0330 2226664

Neptune House	MASH All CP referrals. West Sussex  <a href="https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/">https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-child/</a>	The West Sussex Social services Switch board till 5pm. (calls here will get diverted to the relevant child protection team / area)	01403 229900

**In all cases, following notifying the DSL and Senior Management, the first point of contact is the young person's social worker.** If the young person does not have a social worker then the first point of contact will be MASH.

All young people at My Choice School Oak House are CLA and will have a social worker.

The local MASH team will be notified by the DSL and MASH will guide the school in the next steps, which may involve the Police Child Protection, LADO and Safeguarding Teams.

If out of office hours, the Emergency Duty Social Worker is the first point of referral by the DSL or the Emergency Duty Team if the young person does not have a social worker.

*Ofsted need to be informed if there is an **instigation and outcome of any child protection enquiry involving a child accommodated at one of our homes.** This is in line with the Children's Homes Regulation 2015 and Regulation 40 Notification of a Serious Event. The Registered Care Manager therefore needs to complete a notification of event form send to head office the same day which is then passed to Ofsted within 24 hours.*

*Not all referrals from a children's home result in a section 47 investigation, and it is for this reason, also, that Ofsted need to be notified. It may be, for example, that the home may undertake an internal investigation if West / East Sussex / Surrey CP informs the home they are taking no action as a result of the referral. Ofsted would need to know the result of this, i.e. the outcome, just the same they need to be informed of any section 47 investigation.*

### **Action to Be Taken In All Child Protection and Safeguarding Cases**

Secure the safety of the young person. Remove the person who has abused or threatened to abuse them. Call the Police if there is an immediate danger.

If a young person needs urgent medical attention then they should be taken immediately to the local A&E. On arrival the A&E staff must be informed that the incident may be a Child Protection and Safeguarding one so that they can make notes or take photographs as dictated by their own protocols.

Ask the young person what has happened and record their response. **Do not** cross examine or ask any questions. Simply record the facts that they tell you. Do not replace words used or summarise it your own words what the young person has stated. Read back to the young person what they have stated.

**If an emergency situation and significant harm or risk of significant harm is assessed to be present**, refer the matter at once to MASH or EDT by telephone. Give them the facts clearly and follow the instructions they may give.

The DSL or DDSL will inform by telephone the young person's Social Worker, if not available ask for a Duty Social Worker to urgently talk to you.

Consideration has to be given as to whether it is appropriate to notify parents. This will depend on the circumstances (ie if they are the alleged abuser or the alleged abuse happened in their area whilst on a home visit). The Social Worker may wish to inform parents, this needs to be confirmed by the social worker.

Record the events contemporaneously. Note and log all phone calls and sign, time and date each record. This information will then be recorded on CPOMS as a safeguarding concern by the DSL Care Manager or the DDSL Deputy Care Manager.

Staff must protect the school and home. The school admissions form should list those adults who can have contact with the young person and all visitors to the school must be by prior arrangement. All visitors to the school will have their identities checked, be asked to sign the visitors book and may be asked to leave if their visit is not scheduled or appropriate. Visitors to the school will wear visitor lanyards.

Staff should be aware of individuals that target school and children's homes. No unauthorised visitors should be allowed in no matter how helpful they may be. Visitors must be supervised when at the school. It is

important that they are logged out after they leave. Young people's names and addresses should always be guarded carefully and not given out without thorough checking.

Safeguarding is **everyone's** responsibility.

### **Checklist of Action to be Taken:**

- Secure the safety of the child or young person
- Listen don't ask any questions; never stop a young person who is freely recalling an incident. Explain you are concerned for their wellbeing and help them understand what happens next
- If required arrange for emergency treatment
- Comfort and support the victim
- Consult DSL immediately
- Carefully record events at the time or as soon as possible afterwards. Sign and Date each entry. Record on the Child Protection Disclosure Form.
- Believe children and young people as a matter of course, but never promise to keep a disclosure 'secret'.
- Staff will be suspended without prejudice in the event of an allegation being made against them, see LADO procedures.
- Whistleblow if necessary. It is the duty of all staff to do so if there is abuse happening and action is not being taken. You can do this through contacting the Director/RI, Head of Education, Operations Manager or Team Managers) or contact the local duty desk.

### **Policy links**

Whistleblowing

Admissions

CME

Behaviour Management

Acceptable User agreement

Risk assessment

Health and safety

Employee handbook

My Choice Children's Home Safeguarding

**Reviewed June 2021**

**Interim review due Sept 2021**

**Annual Review due May 2022**