

Policy and Procedure on Child Protection (Safeguarding)

Somerset School

Policy Author	Tom Burford, Director for Improving Children's Services
Approval Date	July 2017 – Minor amendments 10-10-17 to include LSCB.
Next Review Date	July 2018
Version No	V 3.1
Policy Level	Children's Services
Staff Groups Affected	All Staff

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1. Monitoring and Review:

- 1.1.** The Cambian (the Proprietor) will undertake a formal annual review of this policy for the purpose of monitoring and of the efficiency with which the related duties have been discharged, by no later than one year from the date shown below, or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.
- 1.2.** The local content of this policy will be subject to continuous monitoring, refinement and audit by the Head of Service.

Signed:



Anne Marie Carrie
Proprietor, Cambian Group
March 2017



Nicky Teakle
Headteacher, Somerset School
November 2017

2. Definitions and Terminology

Terminology

- 2.1.** Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

'Establishment' or 'Location'	this is a generic term which means the school. Somerset School is an independent day school.
Individual	means any child or young person under the age of 18 or young adult between the ages of 18 and 25. At Somerset School we are registered for up to 40 students from the ages of 10-18.
Service Head / Head of Service	This is the senior person with overall responsibility for the school. At Somerset School, we have a Headteacher who is Nicky Teakle.

Key Worker	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
Parent, Carer, Guardian	means parent or person with Parental Responsibility
Regulatory Authority	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
Social Worker	This means the worker allocated to the child/family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
Placing Authority	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
Staff	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
CambianKPI	is the online in-house information system which holds data for each site on quality measures.
LSCB, LADO, SAB	Local Safeguarding Children Board Local Authority Designated Officer Safeguarding Adults Board

Supporting Information and references

- 2.2.** All Cambian documentation referred to in this policy document is listed in **Section 8** – Standard Forms Relevant Documents, Letters & References

The Definition of Children, Young People and Young Vulnerable Adults.

- 2.3.** Many of our schools and colleges have children, young people and young vulnerable adults in one setting:
- **Children and Young people are under 18.** Working together to Safeguard Children (2015) and Keeping Children Safe in Education (2016) only applies to children and young people until they reach the age of 18. They are covered by the Local Safeguarding Children Boards (LSCB) and their procedures.
 - **Young Vulnerable Adults are those who are over 18.** Government guidance can be gained from the Care Act 2014, since April 2015, which superseded a previous government document called, 'no secrets'. The Social Services and Wellbeing Act 2014 has come into force in Wales on 1 April 2016. Over 18 year olds are covered by the Safeguarding Adult Boards (SABs) in England and Protection of Vulnerable Adults (POVA) in Wales. Recent government documentation has replaced the word vulnerable and use the term '**adults at risk**'. 'An **adult at risk** of harm or abuse is any person who: -has needs for care and support and; -is experiencing or at risk of abuse or neglect; and -as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect'. For the purpose of this policy the term 'adult' will be used.

Definition of Safeguarding

- 2.4.** **Safeguarding** means protecting an individual's right to live in safety, free from abuse and neglect.

Definition of Abuse

- 2.5.** Abuse is a violation of a person's human and civil rights by another person or persons and may result in significant harm to, or the exploitation of the person subjected to it. Abuse can be intentional or unintentional; it may be a single act or repeated acts. Abuse can happen anywhere: for example, in someone's own home, in a public place, in

hospital, in a care home, school or in a college. It can happen when someone lives alone or with others. Anyone can carry out abuse or neglect. Abuse can be:

- **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 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 cyberbullying), 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, although 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **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: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3. Roles and Responsibilities:

Designated Safeguarding Lead (DSL)

Name: Nicky Teakle
Contact: 01823 443133

3.1. Our Designated Safeguarding Lead (DSL) is Nicky Teakle who is the Headteacher..

3.2. The role of the Designated Safeguarding Lead is to:

- Take lead responsibility for managing safeguarding issues and cases.
- Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Board; child or adult.
- Act as a source of advice, support and expertise within the location when deciding to make a referral by liaising with relevant agencies.
- Identify safeguarding training needs and organise training.
- Participate in local safeguarding boards when required.
- Evaluate and contribute to high standards of safeguarding practice at the location.
- Work to ensure that wellbeing of children and young people placed in Somerset School is in constant focus and that they are guarded from harm or abuse.

Designated Deputy

- 3.3.** We have made arrangements for covering the role of the Designated Safeguarding Lead when Nicky Teakle is unavailable. Our Designated Deputies are Charlie Cobb and Ben Copp.

Name: Charlie Cobb	Name: Ben Copp	Name:
Contact: 01823 443133	Contact: 01823 443133	Contact:

For all Key Contacts – see [Appendix II](#)

4. Purpose

- 4.1.** This policy provides staff and volunteers with the guidance they need in order to keep all Individuals safe and secure in any of our settings. Cambian is committed to safeguarding and promoting the welfare of all in our care and expects all staff and volunteers to share this commitment with our aim of helping them to fulfil their potential.
- 4.2.** This policy complies with the statutory and best practice guidance as set out in the [Staff Safeguarding Information Poster](#) and is set out in alignment with legislation outlined in [Appendix I](#) of this policy. It also complies with Somerset Safeguarding Children Board's (SSCB) model safeguarding policy and is in accordance with locally agreed procedures. Relevant printed copies of the Local Safeguarding Children's Boards (LSCB) and Safeguarding Adults Board (SAB) procedures are available in every setting.
- 4.3.** All policies and procedure for child protection (safeguarding) and Safeguarding young Adults must be undertaken in accordance with the requirements of the local authority in which the establishment is situated. In the event that the local authority safeguarding board (LSCB) has been deemed 'Requiring Improvement' or 'Inadequate' by Ofsted or CQC (Child Safeguarding Inspection Programme) the establishment will seek further advice from Cambian and its advisers.
- 4.4.** This policy, and supporting information in various accessible forms, is made available to all children, young people, staff and parents associated with Somerset School to ensure that everyone is clear on how we protect and safeguard children and young people. All staff are expected to be familiar with the Cambian's [Whistleblowing Policy](#) and [Staff Code of Conduct](#). In addition, the NSPCC whistle-blowing helpline number is 0800 028 0285 and the Cambian Whistleblowing service, EXPOLINK can be called on **0800 111 4298**.

5. Policy

- 5.1.** A comprehensive list of all supporting documentation and related policies and guidance referred to in this document can be found in [Section 8](#).

Safeguarding and Promoting the Welfare of Children, Young People and Adults means;

- Protecting children and young adults from maltreatment;
 - Preventing impairment of children's/ young people / young adult's health or development
 - Ensuring that all children, young people and young adults grow up in circumstances consistent with the provision of safe and effective care
 - Taking action to enable all children, young people and young adults achieve their best outcomes.
- 5.2.** We all have a duty to act upon any suspicion, concern or disclosure that may suggest a child, young person or a young adult is at risk of significant harm or in need of help. As provider of specialist education and care services it is imperative that all staff are aware that children, young people and young adults with Special Educational Needs (SEN) and disabilities are more likely to be abused or neglected.
- 5.3.** Safeguarding is everyone's responsibility. We all have a responsibility to understand and implement this policy and related procedures at all times.

6. Procedure

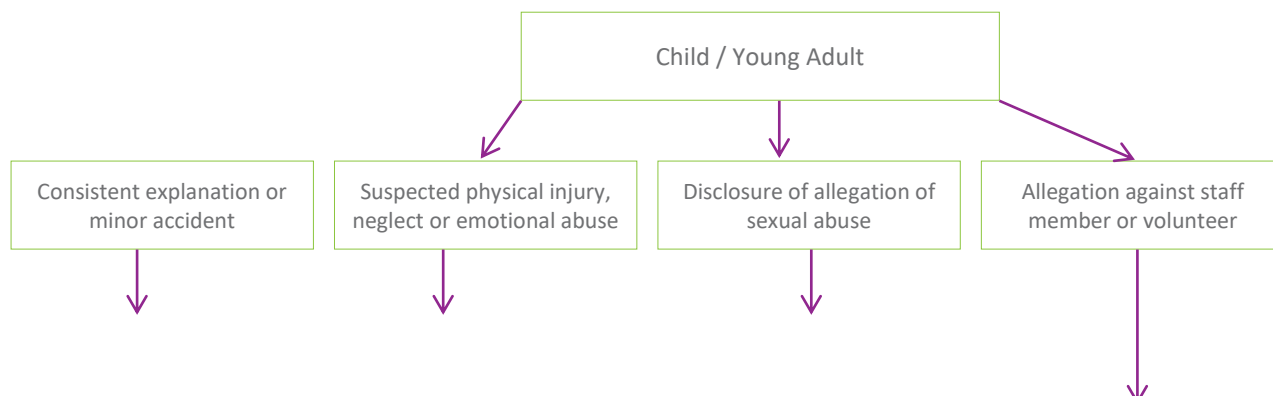
- 6.1.** All staff will be given a personal copy of the booklet entitled, '[Child Protection & Safeguarding Handbook for Staff](#)'. The contents and detail of this document are covered in induction and training programmes and all staff are required to follow the procedures to the letter at all times. DSL training and renewal training will be updated every two years. ALL Cambian staff will not be allowed to work with children unless they have completed basic awareness training in child protection (safeguarding). The school must check that supply/agency staff have completed basic awareness training before being allowed into contact with children. Contractors and others on site who might have unsupervised access to children must also complete basic awareness training before being allowed to start work. All staff must update their basic awareness training at least annually by completing the 'Safeguarding Adults and Children – E-Learning' module on Achieve.
- 6.2.** In recording and managing concerns and allegations regarding the abuse of individuals all staff must use the forms as set out in this policy.
- 6.3.** All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of suspected abuse and neglect should be given the highest priority.

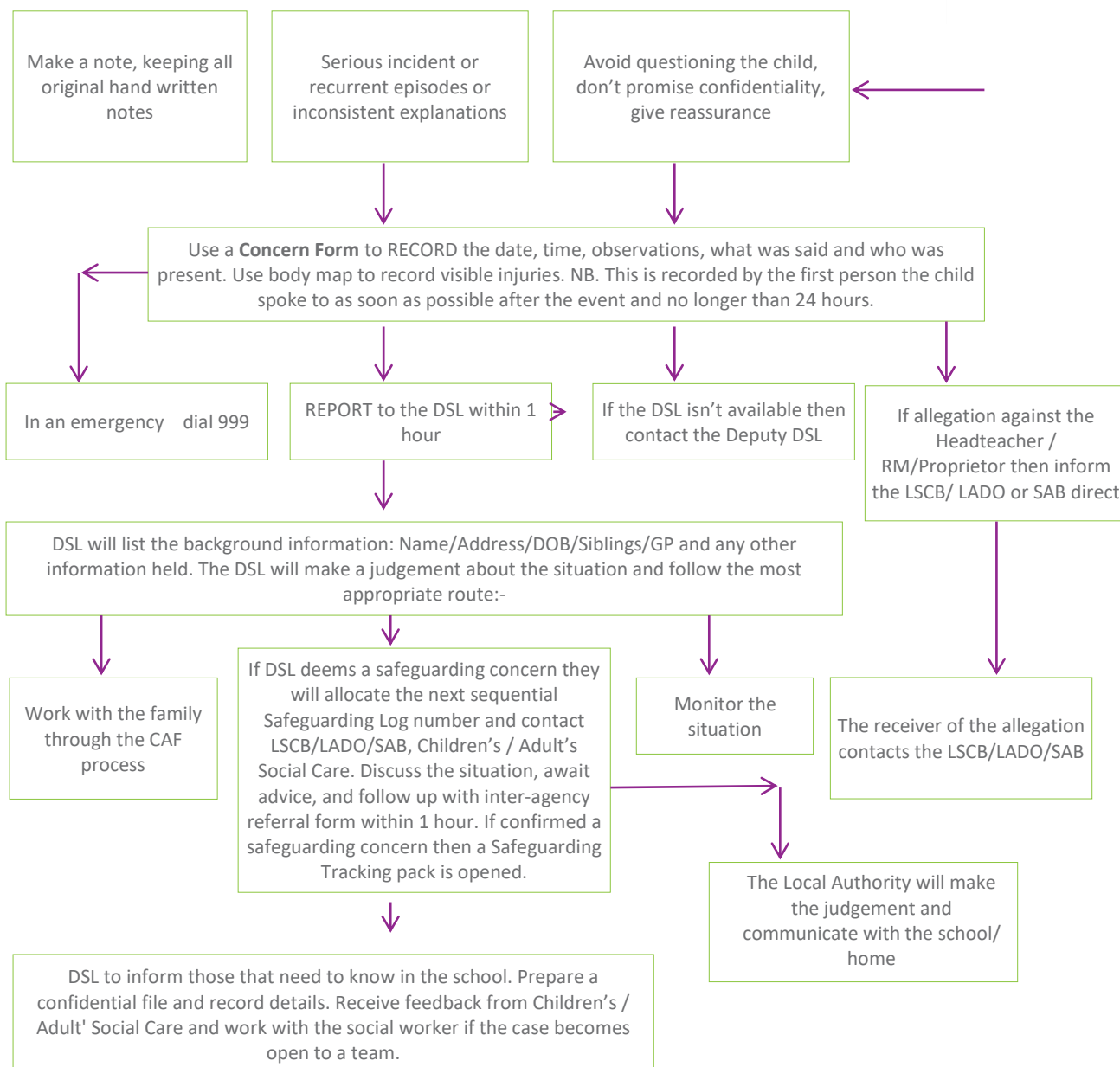
Flow Chart Procedure

The flowchart below sets out the procedure which should be followed:

DSL – Designated Safeguarding Lead
CAF – Common Assessment framework

CSC– Children's Social Care
LADO – Local Authority Designated Officer





Unknown Body Marks

- 6.4.** Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises, swellings, and scratches which by and large will be as a result of daily activities or for some Individuals as a result of self-injurious behaviour. However, all such marks must be recorded appropriately on body maps and using Incident forms and / or accident forms. Parents/carers and social workers should always be kept informed.
- 6.5.** All unaccounted for marks or physical changes on the body must be recorded on a body map and a Concern Form completed and passed to the DSL along with copies of the last 3 days of Daily Diary notes and Activity Records. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if no reason can be found the DSL must allocate a Safeguarding Reference number and contact the LSCB/ LADO for further advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern. The flowchart provided in [Guidance for Investigating Unknown Body marks](#) indicates the correct course of action for dealing with unknown body marks.

Serious Incident Reporting

- 6.6.** In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported to the relevant Care Quality Governance Committee members as outlined in the [Serious Incidents escalation procedures](#).

Immediate Actions

- 6.7.** Where a child, young person or young adult discloses abuse or neglect:

Listen to what they have to say and take them seriously. Reassure them but do not promise to keep it a secret. Children, young people and young adults will be informed that if they want to preserve confidentiality that there are other agencies they can turn to e.g. **Child Line 0800 1111**. If the child/young person/young adult needs medical attention, seek assistance. If urgent medical attention is required see paragraph 6.15.

Record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the young person and any actions taken (which may be used in any subsequent court proceedings) within 24 hours of the disclosure. Ensure all details are recorded using a [Concern Form](#).

Do not

- Investigate the incident
 - Ask leading questions
 - Get the young person to repeat the disclosure over and over
 - Make assumptions or offer alternative explanations
 - Approach/inform the alleged abuser
- 6.8.** The next step is to notify the DSL and pass the Concern Form to them within one hour or as soon as is possible. If the DSL is unavailable, then the Deputy DSL should be informed. All staff know that they can contact the Local Authority direct should that be necessary. Any allegation against a staff member must also be reported to the Head of Service. However, if the allegation is about the Headteacher/DSL then the relevant Operations Director must be informed. [Guidance](#) is available to staff who have an allegation made against them.

*Note: where contact is made with the Local Authority in which Cambian Somerset School is geographically located, contact will also be made with the individual's own Local Authority and also their social worker.

- 6.9.** The DSL will determine whether the matter is a child protection/safeguarding matter or a more general concern and immediately enter the concern details on the [Central Log of Concerns and Safeguarding](#) and insert the concern reference number on the Concern Form. If it is deemed to be a child protection/safeguarding matter the DSL will then also additionally allocate the next sequential Safeguarding Reference number on the Central Log of Concerns, write this number on the Concern form and immediately (or at least within one hour) make a referral to the Local Authority Designated Officer (LADO) at Somerset Schools local safeguarding children's board to discuss the allegation and agree a course of action.
- 6.10.** If the LSCB/LADO/SAB confirms that they do not consider the matter to be a safeguarding concern then the date and time of the contact is recorded on the Concern Form and on the Central Log of concerns and the concern is marked as a Safeguarding Level 1 – No Further Action. It is important to allocate a Safeguarding reference on the log even if no further action needs to be taken. This diligent approach will ensure a clear historic record of contact with the LSCB/LADO/SAB for any matter which is deemed by the DSL to be of concern and has been raised with the LSCB/LADO/SAB.
- 6.11.** If the LSCB/LADO/SAB confirms that the matter is a safeguarding concern and that it requires investigation either at local or external level then a [Safeguarding Tracking pack](#) must be opened with the next sequential Safeguarding Reference included on the form and details as such entered on the central log. The DSL will send a copy of page 1 of the [Safeguarding Tracking Pack](#) to the relevant Operations Director.
- 6.12.** In the case of serious harm, and/or the child, young person or adult is in immediate danger the local Police should be informed immediately as well and they can take immediate protective action as necessary.

- 6.13.** If the matter is a more general concern then ensure that the 'Action Taken' log is completed on the concern form and the form is filed within the Safeguarding file. Either way the form must be signed by the DSL. The relevant concern form should be referenced in the Individual's **Index of Concerns** form in the individual's concern/safeguarding file and the site's Central Log of Concerns.
- 6.14.** All information relating to the Safeguarding concern is recorded on the Tracking Pack and the Safeguarding Concern will remain open until the LSCB/LADO/SAB have confirmed in writing that the concern is closed and an Operations Director or more senior representative of Cambian Group has signed the Safeguarding tracking pack to confirm that the investigation is completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-off have been completed.**
- 6.15.** If it is believed that the child, young person or adult is in imminent danger urgent advice should be sought from the Local Authority and/or the police. The individual can be kept in their care home or on the school site fully supported (e.g. if they are a day student) if advised to do so by these agencies. The parent/carers should be informed and a decision should be made with the Local Authority and the Police about who should do what.
- 6.16.** If the DSL feels unsure about what the child, young person or young adult has said or what has been said by others they can phone the Local Authority to discuss concerns. To do so would not constitute an abuse referral but may help to clarify the situation but they must record all details of any conversation and advice received on a concern form. He/she can then move to a formal referral or actively monitor the situation.
- 6.17.** The LSCB/LADO will oversee any subsequent investigation of any suspicion or allegation of abuse directed against anyone working within the establishment. The establishment will not investigate allegations without first taking instruction from the LSCB/LADO. If as the result of an investigation there has been a substantiated allegation against a member of staff, we will work with the LSCB/LADO to determine whether there are any improvements to be made to our safeguarding policy, procedures and practice to prevent similar events in the future. We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police. Records are kept of all conversations as part of the investigation process and made available as required.
- 6.18.** If a member of staff feels their concerns are not being taken seriously then they are to inform a more senior manager, a Director of the Company or contact Ofsted/CQC/the local safeguarding boards, the police or the **Whistleblowing Hotline – on 0800 1114298.**
- 6.19.** The priority, at all stages throughout this process, is the interests and safety of the Individual. We will try to discuss any concerns about their welfare with their family / carers and where possible seek their agreement to making a referral to the Local Authority. However, where there is a conflict of interests between the child/young person/young adult and parent/guardian, the interests of the child/young person/young adult must take priority and Cambian Somerset School reserves the right to contact child/young person/young adult's local authority, Social Care or the Police, without notifying parents/carers if this is in their best interests.
- 6.20.** If urgent medical attention is needed and there is a suspicion of abuse the DSL should take the Individual to the Accident and Emergency Unit at the nearest hospital, having first notified the Local Authority and seeking advice about what action the Local Authority and/or the Police will take and how the parents/carers will be informed, remembering that every reasonable effort should be made to inform the parents/carers as soon as possible if a child/young person requires urgent hospital attention. If the suspected abuse is sexual then the medical examination should be delayed until the Local Authority and the Police can liaise with the hospital, unless the needs of the young person are such that medical attention is the priority. There must at all times be a responsible adult with the individual whether from the child/young person/young adult's care home/school/college, the Local Authority or the Police, if the parents/carers are not included.
- 6.21.** We will provide an advocate to each Individual where appropriate, if they are unable to speak for themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to MCA. As the Care Act promotes, 'no decision about me without me'. (See **Mental Capacity and Consent** for further guidance on IMCA)

Allegation of abuse by one or more young person on another young person

- 6.22.** All young people involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for dealing with such abuse, where there is 'reasonable cause to suspect that a young person is suffering or likely to suffer,

significant harm' are set out in section 6.1 – 6.19. We will refer young person-on-young person abuse to an external safeguarding agency where there is a risk of significant harm. The DSL will report to the local Authority as above.

Allegation of abuse of a child /young person/ adult who is not registered at our school:

- 6.23.** If we were given information that suggested that a member of staff was abusing someone who does not reside at or attends our school the DSL would immediately report to the Local Authority. The Head of Service would be kept informed. We would then formally advise the employee of the allegation, making it clear that we would not play any part in the investigatory process. The employee would be advised of the possibility of facing suspension, re-assignment to other duties etc. in exactly the same way as if the allegation had involved a child/young person/young adult at our school. If the allegation is subsequently proved to be unfounded, he or she would be given full support in resuming their career.

Allegations against staff

- 6.24.** When an allegation is made against a member of staff, set procedures must be followed. Please see the flow chart in Section 6

We must act on every allegation. However, staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

All allegations against staff should be reported to the Head of Service and DSL. Allegations against the head of Service should be reported to the relevant Operations Director and DSL.

Allegations against the proprietor should be referred directly to the LSCB/LADO/Local Adults Safeguarding Board.

Staff should refer to the **guidance** provided for what to do in the event an allegation is made against them.

Staff on school sites, and parents are reminded that law prohibits publication of material that may lead to the identification of a teacher who is the subject of an allegation. Publication includes verbal conversations or writing, including content placed on social media sites.

Death of someone in our care

- 6.25.** In the event of the death of a child, young person or young adult in one of our homes/schools/colleges we must notify the following within 24 hours:
- Operations director/Regional Manager following the **Serious Incidents** reporting procedures will then brief the Chair of the Quality and Safeguarding Committee, Cambian's Chief Operating Officer Children's Services and Chief Executive.
 - Next of kin/parents/carer of the deceased.
 - Where the death of an individual occurs in an education location the assistance of the local police and social services department should be sought in informing the parents/guardians.
 - The appropriate regulatory body: e.g. Ofsted, CQC, CSSIW
 - Ministry of justice if applicable.
 - The placing authority/authorities.
 - The local authority responsible for Social Services and Education (where the death takes place in a registered school) within whose area the education location is situated.
 - The District Health Authority within whose area the education location is situated.
 - The Department for Children, Schools and Families, (where the death takes place in a registered school).
 - The Health and Safety Executive.

Female Genital Mutilation (FGM)

- 6.26.** If staff have a concern regarding FGM then normal local safeguarding procedures will be activated. In addition mandatory reporting to the police will occur in line with FGM Act 2003 as inserted by section 74 of the Serious Crime Act, 2015

Peer on Peer abuse

- 6.27.** We will minimise the risk of allegations against other pupils by:-
- Providing a developmentally appropriate PSHE syllabus which develops students understanding of acceptable behaviour and keeping themselves safe
 - Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
 - Delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk
 - Developing robust risk assessments & providing targeted work for pupils identified as being a potential risk to other pupils.
- 6.28.** All Individuals will be provided with safeguarding information in a format which is appropriate for their understanding and communication. This may take the form of posters or a leaflet/booklet.
- 6.29.** All staff will be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Staff should be clear as to the school or college's policy and procedures with regards to peer on peer abuse.

Visitors to the school

- 6.30.** All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all times. All unauthorised visitors will be challenged by staff and reported to the headteacher before entry is authorised.

Missing young people

- 6.31.** Every precaution is taken through the use of risk assessments and thorough planning and supervision to ensure that children, young people and young adults are safe both at school, college, home and on outings. If a child, young person or young adult goes missing from our school it is considered a potential indicator of abuse or neglect. Our staff members should follow our [Missing from Care](#) and Education policy and procedures in the event of someone going missing. Accordingly they are expected to act to identify any risk of abuse and neglect, including sexual abuse or exploitation. In addition all school must inform the LA of any student who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 days or more or as such intervals agreed with the Local Authority. It is essential that all staff are alert to signs such as travelling to conflict zones, FGM and forced marriage.

Vulnerable Children and Young people

- 6.32.** Particular vigilance is exercised in respect of young people who are the subject of a Child/Young Person Protection Plan and any incidents or concerns involving these young people will be reported immediately to the allocated Social Worker.

Looked after Children (LAC)

- 6.33.** The most common reason for children or young people being looked after is as a result of abuse/neglect. We will ensure all staff have the skills, knowledge and understanding to help keep these children and young people safe by working closely with the DSL and in the school setting the designated teacher responsible for LAC.

First Aid/Health and Medication (Please refer to our First Aid, Health and Medication Policies)

- 6.34.** Except in cases of emergency first aid will only be administered by qualified First Aiders. If it is necessary for the Individual to remove clothing for first aid treatment there will always be another adult present. All first aid and non-

routine changing or personal care will be recorded and, where significant, will be shared with parents/guardians/carers. Individuals requiring regular medication or therapies will have a medical plan which is agreed with parents/carers/guardians.

Prevent

- 6.35.** All staff are fully aware of their duty in assessing the risk of our children, young people and adults being drawn into terrorism including support for terrorism ideology fundamental to which are extremist ideas. In accordance with our e-safety policy we need to be vigilant in ensuring the safety from extremist and terrorist material when accessing the internet. We take into account Somerset Local Authority Safeguarding Children's Board arrangements to fulfil its Prevent duties. Cambian supports our children, young people and young adults in making positive choices about their lives and endorses the Channel early intervention scheme for those who could be at risk of radicalisation. We use **Channel** for co-ordinated advice and guidance as appropriate depending upon individual needs. Refer to the Prevent policy.

Abuse of Position of Trust

- 6.36.** All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the staff and a young person under 18 may be a criminal offence, even if that young person is over the age of consent.

Volunteers

- 6.37.** Volunteers undergo checks commensurate with their work in the home/school/college and contact with children, young people and adults i.e. if they are in regulated activity or not.

Contractors

- 6.38.** We will check the identity of all contractors working on site and requests the full range of DBS and other required checks where they work in regulated activity or unsupervised in accordance with the latest government guidance.

Extended school and off-site arrangements

- 6.39.** Where extended off-site activities are provided by and managed by us, our safeguarding policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures and clarify whose procedure is to be followed if there are concerns. There will be clear communication channels to ensure the DSL is kept appropriately informed.
- 6.40.** When our Individuals are doing off-site activities, including day and residential visits and work related activities, we will risk assess and check that effective safeguarding arrangements are in place. The DSL will be kept appropriately informed.

Use of mobile phones

- 6.41.** Staff must behave in accordance with the **Staff Code of Conduct** and Internet and social media access including **Cambian Phones Policy** at all times.
- 6.42.** All computer equipment and internet access within the home/school/college is subject to 'parental controls' and internet safety rules in line with our **e-safety policy**, **Anti-bullying policy** and Internet and social media access including **Individual's use of mobile phones** policy. Staff should not use any computer for personal reasons during working hours. Staff need to help our Individuals to prepare for the hazards whilst promoting the many learning and social opportunities available through the internet and social media. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they should neither mention Somerset School or make reference to their

employment at the school. Staff are advised not to communicate with parents, guardians, carers or Individuals via social networking sites.

Photography and images

6.43. The vast majority of people who take or view photographs or videos of children and young person do so for entirely innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people through taking or using images, so we must ensure that we have some safeguards in place.

To protect our children, young people or young adults we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- seek parental consent – where appropriate
- not use their full name with an image
- ensure that personal data is not shared.
- store images appropriately, securely and for no longer than necessary.
- only use school equipment, i.e. not personal devices.
- encourage our children, young people and adults to tell us if they are worried about any photographs that are taken of them.

Physical intervention and use of reasonable force

6.44. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are specific to the child, young people or young adults in line with our physical intervention training (such as MAPA® or PILLARS). Restraint will only be used as a last resort and all incidents of this are reviewed, recorded and monitored. Reasonable force will be used in accordance with government guidance.

Staff Taking Medication or other substances

6.45. Staff members must not be under the influence of alcohol or any other substance which may affect their ability to care for our children, young people and young adults. If they are taking medication they should seek medical advice and inform the Headteacher who will review the medical advice and take a decision as to whether they are fit for work. We only allow staff to work if medical advice confirms that their ability to look after children/young people/young adults is unlikely to be impaired. Should a member of staff need to bring their medication to the home/school/college, it must be securely stored and out of reach of all children, young people and young adults. [GHR 12 Drug and Alcohol Policy](#).

Teaching and Learning

6.46. Our children, young people and adults are given opportunities through teaching and learning how to develop their knowledge and understanding of safeguarding and how to keep themselves safe; this can be formally through the curriculum and through informal opportunities.

Information for individuals and relatives/carers

6.47. Individuals, relatives and carers that go to a Cambian location will be given information regarding safeguarding. The format of the information given will take into account the age of the individual, and level of understanding. Safeguarding information will be available in a range of media and user friendly formats for individuals. These will explain clearly what abuse is and also how to express a concern or make a complaint. All visitors to each location will receive a [Safeguarding Information Leaflet](#) which includes contact details of all DSLs.

6.48. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be dealt with independently and that they will be kept involved in the process to the degree that they wish to be. They will be

reassured that they will receive help and support in taking action. They will also be advised that they can nominate an advocate or representative to speak and act on their behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be appointed. They will be advised of rights to legal aid in where appropriate to victim support and compensation.

7. Accountability

- 7.1.** Nicky Teakle is the Designated Safeguarding Lead (DSL) at Somerset School and has lead responsibility for protecting and safeguarding children, young people and young adults and liaising with the local authority and other local agencies as appropriate. This includes young person protections, referrals, raising awareness, training, allocating resources and supporting/directing staff within the Location. In all matters relating to young person protection and safeguarding Somerset School will follow the procedures outlined in this policy.
- 7.2.** The content and effective implementation of policy and procedures are subject to routine monitoring by the Head of Service. Our Operations Director, will undertake a full annual review of the content and effective application of this policy and associated procedures. The date for the next scheduled review is set out on page 1. The policy will be reviewed earlier in accordance with changes in legislation, regulatory requirements or as a result of best practice guidance.
- 7.3.** The Cambian Chief Operating Officer is the company's Safeguarding Lead.- She will support and promote the development of initiatives to improve the prevention, identification and response to abuse and neglect. She is the Board's safeguarding lead and is the director accountable for safeguarding is responsible for reporting to the Board and providing executive leadership. He/she is accountable for the governance of safeguarding.
- 7.4.** Corporate Executive Board (CEB) - has a responsibility to ensure there is Board level leadership, an overall policy in place and an organisational culture which places Individuals and their wellbeing at the centre of safeguarding, and that endeavours to prevent harm, abuse, and neglect from occurring.
- 7.5.** The Cambian Board operates a Quality & Safeguarding Committee which has authority to review the Company's systems and processes for identifying, evaluating and managing the operational quality, clinical risk and regulatory compliance matters faced by the Company and to report to the Chairman and make recommendations to the Board on the effectiveness of development, operation and function of such systems. The Committee's purpose To ensure that robust and effective arrangements (systems, processes, procedures and reporting) are in place with respect to Cambian's statutory responsibilities and duties for safeguarding and promoting the welfare of all children and young people. The committee meets quarterly and is chaired by a Non-Executive Director with designated responsibility for quality and safety.
- 7.6.** Managers - are responsible for ensuring that staff are aware of this policy and offer support to those reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can be stressful and distressing for staff.
- 7.7.** Regulated professionals - Staff governed by professional regulation (for example, social workers, doctors, allied health professionals and nurses) should understand how their professional standards and requirements underpin their organisational roles to prevent, recognise and respond to abuse and neglect.
- 7.8.** All staff - are responsible for identifying and responding to allegations of abuse. Staff at operational level need to share a common view of what types of behaviour may be abuse or neglect and what should be an initial response to suspicion or allegation of abuse or neglect.
- 7.9.** All staff should make sure that they have familiarised themselves with their local multi-agency safeguarding policy as this policy is designed to complement rather than replace the multi-agency policies which define the local practice that must be followed.
- 7.10.** In the event that the Lead or Deputy safeguarding Lead are on leave or away from the Location and not contactable alternative arrangements must be put in place, cascaded to staff and displayed so staff can access contact names and details if required.

7.11. We are governed by a set of six Person Centred principles (Ref: Care Act Statutory Guidance) to ensure that Young Adults who are at risk of abuse, harm, neglect and exploitation have help and support in a way that is sensitive to their individual circumstances, is person centred and outcome focused. These principles will inform the ways in which we work with young adults:

- **Empowerment:** people being supported and encouraged to make their own decisions, presumption of person led decisions and informed consent
- **Prevention:** wherever possible the aim will be to take action before harm occurs and ensure early engagement with all relevant people
- **Proportionate:** Response appropriate to the risk presented; least intrusive response where possible
- **Protection:** support and representation for those in greatest need
- **Partnership:** multi agency local actions through services involved in working with the individuals. Engagement with local communities to prevent, detect and report abuse.
- **Accountability:** transparency in detecting and responding to safeguarding cases

Duty of Candour

7.12. 'The statutory Duty of Candour places a requirement on us as providers to be open with Individuals in our care and their families when there are failings or things go wrong. As a provider we have established a duty throughout our organisations, ensuring that honesty and transparency are the norm in every location. Staff should refer to the **Duty of Candour** policy.

Recruitment and vetting

7.13. Our Cambian **Recruitment Policy** reflects Safer Recruitment guidelines and legislation in appendix I as well as carrying out further checks and precautions as required and available.

7.14. **Single Central Record (SCR)**- we keep a Single Central Record at each Cambian Location. This covers all staff including supply teaching and teacher trainees, agency care staff as well as all members of the proprietor body. This is regularly audited.

7.15. When we use agency staff we ensure we obtain written confirmation that all checks have been completed, in line with safer recruitment, from the employment business that is supplying the member of agency staff. All Cambian Locations must ensure that a contract exists between the Location and the agency to confirm that, in the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate before that person can begin work at the home/school/college. Cambian Locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the agency.

7.16. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject to the same recruitment regulations and procedures as the education staff.

Requirements to inform Disclosure and Barring Services (DBS)

7.17. We will report promptly to the DBS (but no longer than one month after leaving the Location), any person (whether employed, contracted, a volunteer or student) whose services are no longer required because he/she is considered unsuitable to work with children and young people. This includes making a referral where an employee has been dismissed (or would have been dismissed) had he/she not resigned beforehand.

Recording and information sharing

7.18. All contact with parents, carers and external agencies relevant to Children and Young Person Protection is logged and kept in confidential records. These can only be accessed by designated people within the home. The content of Young person Protection reports will be made available in advance of relevant meetings.

Record-keeping

- 7.19.** Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse is made, staff must keep clear and accurate records using a Concern Form.
- 7.20.** Records should be, factual, accurate, concise, ethical and relevant.
- 7.21.** All recording of written information should be legible and discussions with other professionals and agencies should be recorded chronologically.
- 7.22.** There will be a safeguarding section/folder for each child/young person/young adult which will hold any concerns/safeguarding documentation for that individual. At the front of each folder there is an **Index for Individual's Concerns**. This is to enable the location to keep accurate records of any concerns raised regarding the individual and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure location.
- 7.23.** Each location will also maintain a **Central Log of Concerns** of all concerns raised at the location including the safeguarding information where the concern has escalated. Where this is held as a paper version this is to be made into a bound booklet and completed by the DSL. If kept electronically, access is to be restricted to the DSL and deputies only. In either case this should be kept in a secure location.

Monitoring and supervision

- 7.24.** A quality assurance cycle operates to ensure that safeguarding incidents and notifications are recorded, managed and responded to at the Location, at a regional level and at a whole divisional level [see Accountability section on Governance]. The cycle is informed by a weekly submission of Key Performance Indicators (KPIs) using **CambianKPI** and the identification and management of safeguarding risks.

Training

- 7.25.** All staff will receive information regarding Safeguarding on induction. The induction introduces the new staff member to policy, procedure and practice at the location. They will also be orientated to where to find information regarding safeguarding including relevant posters around the location. As part of their induction all staff are required to read this policy and confirm that they understand their role in safeguarding and protecting young people within our school/college/home.
- 7.26.** All staff will complete mandatory training regarding safeguarding via the company's Achieve module. The module also has off-line activities which demonstrate transference of knowledge and are signed off by the line manager. This module is completed annually to maintain staff awareness of their responsibilities in relation to children /young people/young adult's Safeguarding at all times. The DSL will ensure all staff receive annual face to face safeguarding workshops. This can be undertaken in such forums as staff meetings etc. and recorded on Achieve. In addition to this safeguarding workshops are provided both by internal trainers and by external companies as required.
- 7.27.** DSLs and Deputies DSLs attend safeguarding training every two years with their own local authority. Where a local authority does not provide this training they will attend training in line with the local authority guidance. This training must be updated annually
- 7.28.** We provide role-appropriate and refresher training to all staff including those specific to the role of DSL and Deputy DSL, in accordance with local safeguarding procedures and KCSIE (2016). We consult with Somerset Safeguarding Children's Board to determine the schedule, level and focus for training. Safeguarding training provided by the Achieve module will include domestic abuse, forced marriage, modern day slavery, radicalisation and cyber bullying. The DSL is responsible for promoting awareness of:
- Mental Health
 - Private Fostering
 - Prevention of Radicalisation
 - Sexting
 - CSE

- Teenage Relationship Abuse
- Trafficking
- Drugs
- Fabricated and Induced Illness
- Faith Abuse
- Gangs
- Children Missing from Education
- Bullying
- Domestic Violence
- FGM
- Forced Marriage
- Gender Based Violence – including Breast Ironing

7.29. The Prevent strategy requires that our staff are trained so that they have the necessary knowledge and confidence to identify young people at risk of being drawn into terrorism, to challenge extremist ideas and to know how to refer children and young people and young people for further help. Channel Preventing Radicalisation programme online general awareness training is used if there is difficulty in accessing local training. We also have a [Prevent policy](#).

Confidentiality

- 7.30.** Information relating to individual Safeguarding cases is confidential, although some information can be shared with relevant staff this should be done only on a ‘need to know’ basis.
- 7.31.** In certain circumstances it will be necessary to exchange or disclose personal information with other agencies. This must be done in accordance with relevant Cambian policies e.g. [Data Protection/Confidentiality](#) and all relevant legislation including the Data Protection Act 1998.
- 7.32.** When sharing safeguarding information regarding an individual, staff will consider the following:
- Information should only be shared on a ‘need to know’ basis when it is in the best interests of the individual;
 - Informed consent should be obtained but, if this is not possible and other adults are at risk of abuse or neglect, it may be necessary to override the requirement;
 - Distinguish fact from opinion.
 - Ensure you are giving the right information about the right person.
 - Ensure you are sharing information securely
- 7.33.** Inform the person that the information has been shared if they were not already aware of this and if it would not create or increase risk of harm to them/others.
- 7.34.** The following wording is to be added to any covering letter where we are sharing documentation
- “The material contained in this letter and its enclosures are confidential to Cambian Group and the persons named within the documentation. The documentation is delivered only in accordance with a perceived legal obligation to make the documentation available and upon the strict understanding that the recipient and all members of the recipient’s staff will undertake to preserve confidentiality and not in any way share the documentation or any details of the information therein contained with any other party. Any person receiving this information who breaches these obligations of confidentiality will be held strictly responsible and will be expected to indemnify Cambian Group and any persons named within the documentation against any losses that may arise as a result of misuse of this material”.
- 7.35.** If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact details for the Caldicott Guardian at our location is Joshua Fitzgerald, Regional Educational Lead.
- 7.36.** Failure to follow this policy and location procedure may result in disciplinary action.

Complaints and Monitoring

- 7.37.** All complaints arising from the operation of this policy will be considered under the **complaints procedure**, with reference to the our Designated Safeguarding Officer(DSL) and Somerset Safeguarding Children's Board

8. Standard Forms, Relevant Documents, Letters & References

Staff should read the following policies in conjunction with the safeguarding policy:

- 8.1.** Anti-bullying Policy - 21
- 8.2.** Behaviour Policy – CH02, OFSCH 08
- 8.3.** Complaints Policy - 22
- 8.4.** Data Protection – GIG 02
- 8.5.** Duty of Candour - 97
- 8.6.** First Aid Policy – GHS 04.10
- 8.7.** Health Policy
- 8.8.** Internet and social media access including phones
- 8.9.** Medication Policy including Medication Errors - 60
- 8.10.** Mental Capacity and Consent Policy - 13
- 8.11.** Prevent Policy - 26
- 8.12.** Recruitment Policy – GHR 03
- 8.13.** Serious Incidents Procedures - 35
- 8.14.** Single Central Record
- 8.15.** Staff Code of Conduct – GHR 11
- 8.16.** Whistleblowing Policy – GHR 30

Listed below are the supporting documents for this policy

(Click to Open each one)

- 8.17.** 25.01 - Index Form for Individuals Concern File
- 8.18.** 25.02 - Individual Safeguarding Poster
- 8.19.** 25.03 - Individual Safeguarding Poster – Easy Read
- 8.20.** 25.04 - Concern Form
- 8.21.** 25.05 - Safeguarding Tracking Pack
- 8.22.** 25.06 – Safeguarding Information Leaflet
- 8.23.** 25.08 - Central Log of concerns
- 8.24.** 25.09 – Child Protection and Safeguarding Handbook for Staff

- 8.25.** 25.10 – Guidance for staff who have had an allegation made against them
- 8.26.** 25.11 – Concern or Witness Report
- 8.27.** 25.12 – Local Safeguarding Procedure
- 8.28.** 25.13 - Staff Safeguarding Information Poster
- 8.29.** 25.14 – Guidance notes for Designated On Call Person
- 8.30.** Appendix 1 (attached) – Statutory Legislation
- 8.31.** Appendix 2 (attached) – Key Contacts

Further guidance / information

- 8.32.** Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information on its website www.nspcc.org.uk/preventing-abuse/. Our home/school/college can also access broad government guidance on the issues listed here via the GOV.UK website: young person sexual exploitation (CSE); bullying including cyber bullying; domestic violence; drugs; fabricated or induced illness; faith abuse; female genital mutilation (FGM); forced marriage; gangs and youth violence; gender-based violence/violence against women and girls (VAWG); mental health; private fostering; radicalisation; sexting; teenage relationship abuse; trafficking.

9. Appendix 1: Statutory legislation

This policy complies with the following:

- Statutory Instrument 2015 No.541 Social Care, England The Young people's/care home Homes (England) Regulations 2015 in force as of 1st April 2015.
- Guide to the Young people's/care home Homes Regulations including the Quality Standards (DfE: April 2015)
- Working Together to Safeguard Young people (WT) A guide to inter-agency working to safeguard and promote the welfare of young people (HM Government: 2015)
- This policy is also in accordance with the Local Safeguarding Young people Board (LSCB) locally agreed inter-agency safeguarding processes and procedures
- Keeping Young people Safe in Education (KCSIE) Information for all school and colleges (DfE: September 2016)
- Disqualification under the Young person care Act 2006 (February 2015) and also refers to non-statutory advice for practitioners, What to do if you're worried a young person is being abused (HM Government: March 2015)
- Working Together to Safeguard Young people (WT) (HM Government: 2015) which also refers to non-statutory advice, Information sharing HM Government: March 2015)
- Prevent Duty Guidance: for England and Wales (March 2015) (Prevent). Prevent is supplemented by The Prevent duty: Departmental advice for schools and young person minders (June 2015) and The use of social media for on-line radicalisation (July 2015)
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2015
- Female Genital Mutilation Act 2003, (as inserted by section 74 of the Serious Crime Act 2015)
- Terrorism Act 2000
- Counter Terrorism and Security Act 2015
- The School staffing regulations , England 2009
- The Teachers Disciplinary regulations, 2012
- Parts 3 and 4 Schedule to the Education independent Schools Standard Regulations, 2014.
- Safeguarding Children in Education 2010
- All Wales Child Protection Procedures 2008
- All Wales POVA Guidance 2008.
- Keep learners Safe 2015.
- Social services and wellbeing Act 2014

10. Appendix II – Key Contacts

Designated Safeguarding Lead (DSL) is Nicky Teakle

Telephone: 01823 443133

Email: nicky.teakle@cambianguroup.com

Deputy Designated Safeguarding Lead is Charlie Cobb

Telephone: 01823 443133

Email: Charlie.cobb@cambianguroup.com

Headteacher/Principal/Home Manager is Nicky Teakle

Telephone: 01823 443133

Email: nicky.teakle@cambianguroup.com

Operations Director is Mike Ore

Telephone: 07876791927

Email: mike.ore@cambianguroup.com

Directorate (Residential Services)

Safeguarding lead for Residential Services is Anne Marie Carrie (CEO Children's Services)

Telephone 07254 50771 (24hrs)

Email: AnneMarie.Carrie@cambianguroup.com

Group

The Proprietor of the Young people's/care home is The Cambian Group. The Proprietor's representative is Anne Marie Carrie (CEO Children's Services) whose contact details are above.

Local authority

Somerset Local Authority & Somerset Safeguarding Children's Board

Telephone: 0300 123 2224

Office hours: Monday to Thursday 9:00am-5:15pm, Friday 9:00am-5:00pm

Outside of office hours

Somerset and Avon police

Emergency telephone number is 999

The non-emergency police telephone number is: 111.

For young people under the age of 18:

The Local Authority Designated Officer (LADO) is Anthony Gobles

Telephone: 0300 123 2224 (Office hours: 9-5. Outside of office hours/weekends, the emergency duty team can be contacted on: 0300 123 2327.)

Local Safeguarding Children's Board/ Local Safeguarding Adult's Board (LSCB/LSAB)

The name, address and contact details for the Local Safeguarding Board is as follows:

Address: Somerset Safeguarding Children Board, PP2 B3W, County Hall, Taunton, Somerset, TA1 4DY

Telephone (24hrs): 0300 123 2327

Email: LSCB@somerset.gov.uk