

# Tumblewood Community & School Child Protection & Safeguarding Policy 2018

KEY SAFEGUARDING PERSONNEL			
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### Children's Social Care referrals:

Multi-Agency Safeguarding Hub (MASH): 0300 456 0108  
Out of hours: 0845 6070 888

If you believe a child is at immediate risk of significant harm or injury  
you **MUST** call the police on 999

**Wiltshire Designated Officer For Allegations (DOFA): 01225 713945**

**Early Help Single Point of Entry: 01225 718230**

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Appendix 1: The Role of the Nominated Director for Safeguarding

Appendix 2: The Role of the Designated Safeguarding Lead (DSL)

Appendix 3: Indicators of abuse and neglect

Appendix 4: WSCB flowchart 'What to do if you're worried a child is being abused/neglected'

Appendix 5: School concerns – "Actions where there are concerns about a child"

Appendix 6: Tumblewood Concern/ Suspicion form

Appendix 7: Tumblewood Concern – Chronological Record

Appendix 8: WSCB Welfare and Child Protection Concern form

Appendix 9: Missing From Care flowchart

## 1 Tumblewood's Safeguarding Commitment

### Our Commitment to Safeguarding:

**Tumblewood School and Community** are committed to safeguarding and promoting the welfare of all residential and day pupils and those young people who reside in our residential community. All residential and day pupils' welfare is of paramount importance and the adults working within both school and care take the welfare concerns of our young people seriously and encourage young people to share concerns both internally and externally. We recognise that these young people may be especially vulnerable to abuse and we will always take a child focused and sensitive approach which supports the individual needs of all our young people.

#### What is safeguarding?

**Safeguarding** can be defined by promoting the health, safety and welfare of all children.

**Safeguarding** is the responsibility of all adults, especially those working or volunteering with children. Tumblewood Community aims to help protect the children in its care by working consistently and appropriately with all relevant agencies to reduce risk and promote the welfare of children.

#### Staff:

- are advised to maintain an attitude of 'it could happen here' as far as safeguarding is concerned
- should always act in the best interest of the child.

#### What is child protection?

Child protection is a part of safeguarding and promoting welfare. This refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm.

## 2 Legislative Framework and Guidance

Tumblewood follows the child protection procedures set out by the Wiltshire Safeguarding Children Board and in accordance with statutory guidance issued by the Department for Education (DfE) "Keeping Children Safe in Education 2016" and "Working together to safeguard children 2015". This means that all children are taught about safeguarding, including online, through various formal/informal teaching and learning opportunities as part of providing a broad based balanced curriculum and treatment programme.

The role of the Nominated Director for Safeguarding is outlined in Appendix 1.

Two senior members of staff are appointed by the Directors to the role of Designated Safeguarding Lead (DSL) for child protection and safeguarding. The role of the DSL is outlined in Appendix 2.

This policy should be read alongside the following other school and care policies and relevant government legislation and guidance:

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• Anti-bullying policy</li> <li>• Child Exploitation Policy</li> <li>• Contact with Children Policy</li> <li>• Disclosures Policy</li> <li>• E-Safety &amp; Internet Use Policy</li> <li>• Female Genital Mutilation Policy</li> <li>• Missing From Care Policy</li> </ul> | <ul style="list-style-type: none"> <li>• Working together to safeguard children 2015</li> <li>• Keeping children safe in Education (September 2016)</li> <li>• The Serious Crime Act 2015</li> <li>• Children Missing Education (CME September 2016)</li> <li>• WSCB Allegations Management Policy</li> <li>• HM Government "Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers" Mar 2015</li> </ul> |
|---|--|

This list is not exhaustive.

In addition all school staff will have read and understood Part 1 of the latest version of Keeping Children Safe in Education (KCSiE) September 2016, and staff that work directly with children should also read Annex A of the same document.

### 3 Safeguarding information for children – the Children's Role

Children at Tumblewood may talk to:

Head Teacher	Jen McMillan
Registered Manager	Polly Atkins
Deputy Manager	Jackelyn Bradley
Assistant Psychologist	Laura Edrop
Team Leaders	Martyn Mackie, Ria Cooper
Key worker	<i>different for each child</i>
Director	Sue Hortop
NYAS visitor	Toni Brodie
Childline	0800 1111
NSPCC helpline	0808 800 5000
NSPCC Whistleblowing helpline	0800 028 0285
Ofsted	0300 123 1231

The day and residential day pupils at Tumblewood are informed about safeguarding and including online safety, teaching and learning opportunities; we have open and reflective discussion with young people about safeguarding. If the young person agrees we always facilitate an advocate and independent visitor; for those who do not wish to access this, we actively encourage and support them to do so.

Tumblewood school and community is committed to ensuring that pupils are aware of behaviours towards them that are not acceptable and how they can keep themselves safe. All residents and day pupils know who the designated safeguarding lead is and who has responsibility for child protection and they are kept informed of whom they may talk to should they have a safeguarding concern.

## 4 What constitutes child abuse and neglect?

All adults who work or volunteer with children should be able to identify concerns about child abuse. The types of abuse are:

Main categories of abuse:	Specific safeguarding issues*: *For other safeguarding issues, please refer to <i>Keeping Children Safe in Education</i> 2016 (p.12-13).
<ul style="list-style-type: none"> <li>• Physical abuse</li> <li>• Emotional abuse</li> <li>• Sexual abuse</li> <li>• Neglect</li> </ul>	<ul style="list-style-type: none"> <li>• Child Sexual Exploitation</li> <li>• Peer on Peer</li> <li>• PREVENT</li> <li>• FGM</li> <li>• Sexting</li> <li>• Forced Marriage</li> <li>• E Safety</li> <li>• Honour Based Violence</li> <li>• Children Missing Education CME</li> </ul>
<p><b>For more information, including indicators, please refer to Appendix 3</b></p>	

### 4.1 Child Sexual Exploitation (CSE)

#### “Working together to Safeguard Children” (2015)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/592101/Working\\_Together\\_to\\_Safeguard\\_Children\\_20170213.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_Together_to_Safeguard_Children_20170213.pdf) states:

Child sexual exploitation (CSE) 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/suspicious 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

### **Potential vulnerabilities**

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.

- Potential vulnerabilities include:
- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic violence 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)**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

### **In summary this means:**

1. CSE is a form of sexual abuse where children are sexually exploited for money, power or status.
2. It can involve violent, humiliating and degrading sexual assaults.
3. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status.
4. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them.
5. CSE does not always involve physical contact and can happen online.
6. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

## 4.2 Female Genital Mutilation (FGM)

Female genital mutilation (sometimes known as 'female circumcision') refers to surgical 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

### **Warning signs of imminent FGM:**

You **MUST** be alert to the possibility of imminent FGM if:

<b>X</b>	there is a visiting female elder
<b>X</b>	there is talk of a special procedure or celebration to become a woman
<b>X</b>	parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays)
<b>X</b>	parents wish to withdraw their children from learning about FGM

### **Indications that FGM may have already taken place may include:**

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

### **The Serious Crime Act 2015**

<http://www.legislation.gov.uk/ukpga/2015/9/part/5/crossheading/female-genital-mutilation/enacted> 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 and care homes, this will usually come from a disclosure.

**Additional information for teachers: FGM Mandatory Reporting Duty**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/525405/FGM\\_mandatory\\_reporting\\_map\\_A.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/525405/FGM_mandatory_reporting_map_A.pdf)

By law, teachers must personally report to the police cases where they discover an Act of FGM in under 18s appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care.

### 4.3 Domestic Abuse (DA)

The cross-government definition of domestic violence and abuse is (Gov.uk, 2018):

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those **aged 16** or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- **psychological**
- **physical**
- **sexual**
- **financial**
- **emotional**

#### **Controlling behaviour:**

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

#### **Coercive behaviour**

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

The Registered Manager or Deputy in their absence may seek information regarding a young person's partner 'Right to Know' scheme. This enables an agency to apply for a disclosure if the agency believes that an individual is at risk of domestic violence from their partner. Again, the police can release information if it is lawful, necessary and proportionate to do so.

If there is evidence of domestic abuse, the young person may also be referred to a Multi-agency Risk Assessment Conference (MARAC). The role of MARAC coordinators and administrators is to:

- help to establish communication between all parties
- give information to partner agencies about the MARAC process, where appropriate
- work with the chair to identify agency gaps
- establish links with these agencies to enable them to take part in the MARAC

The young person may also be allocated an IDVA (independent domestic violence adviser), they serve as a victim's primary point of contact, IDVAs normally work with their clients from the point of crisis, to assess the level of risk.



An allegation of domestic abuse will be treated similarly to other child protection concerns; referred to social worker as lead.

#### **4.4 Honour based violence (HBV)**

So-called 'honour-based' violence 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 HBV are abuse, regardless of the motivation, and should be handled and escalated as such.

Where any member of staff is concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency.

#### **4.5 Preventing Radicalisation**

As part of the Counter Terrorism and Security Act 2015 schools have a duty to 'prevent people being drawn into terrorism'. This duty has become known as the 'Prevent Duty'. Where staff are concerned that young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead. The Designated Safeguarding Lead has received training about Prevent Duty and tackling extremism, and is able to support staff with any concerns they may have.

Tumblewood is committed to offering residential and day pupils a broad and balanced curriculum which aims to prepare them for modern life in Britain, and we use our curriculum to ensure young people understand how people extreme views share these with others, especially using the internet through the school curriculum and the treatment programme.

Teaching of Tumblewood's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

#### **Recognising Extremism**

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially towards other faiths or cultures
- making remarks or comments about or being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Protecting children from the risk of radicalisation is part of Tumblewood's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse.

During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Staff should use their judgement in identifying children who might be at risk of radicalisation and speak to the Designated Safeguarding Lead if they are concerned about a child. The DSL will act proportionately which may include making a referral to the Channel programme or the MASH.

#### 4.6 Children missing education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about child sexual exploitation. Tumblewood monitors attendance carefully and addresses poor or irregular attendance without delay.

In response to the guidance in "Keeping Children Safe in Education" 2016 the school has:

1. Staff who understand what to do when children do not attend regularly.
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards); or
  - e. are permanently excluded

Tumblewood ensures that pupils who are expected to attend the school, but fail to take up the place are referred to the local authority.

If a member of staff or volunteers become aware that a child is missing, or missing education, this is to be reported to the DSL immediately and in their absence the Deputy DSL.

If a child takes unauthorised and unsupervised time away from Tumblewood, the WSCB procedure is followed and the matter referred to the MASH team. If a looked after child or a child subjected to a CP plan goes missing, Tumblewood refers them to the MASH team within 48 hours.

**Unauthorised absence procedures** are followed where a child or young person has:

<b>X</b>	10 days or more continuous absence from school without an explanation
<b>X</b>	left school suddenly and the destination is unknown
<b>X</b>	not taken up an allocated school place as expected

Despite there being no current statutory duty, Tumblewood School takes the following steps since the Reg. 28 Prevention of Future Deaths coroner's report concerning the death of a 4 year old boy in October 2016:

- holds at least two phone numbers for different adults in respect of the child
- renews contact details every term, paying particular attention to families who might lead complex lifestyles and whose contact details might change regularly
- phones each number and, if the whereabouts of the young person cannot be established, immediately contacts the Local Authority or the young person's social worker

## **Day Students**

Any such concern is reported to the Primary Carer and Social Worker who will inform the Local Authority.

## **Elective Home Education**

The school refers any child being withdrawn from school with the intent to be electively home educated where there are safeguarding concerns to the MASH.

## **4.7 Children Missing From Care**

Please refer to the Tumblewood Missing from Care Policy and flow chart in the appendix.

There is a flow chart on display in each area of the home.

## **4.8 Allegations of abuse made against other children: peer on peer abuse**

Tumblewood believes that all children have a right to attend school and to learn in a safe environment, and that children should be free from harm by adults and other children in the school and in the home.

Occasionally, safeguarding allegations may be made against children by others in the home/school. Staff are made aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but is not limited to:

- bullying (including cyber bullying)
- gender based violence/sexual assaults
- sexting [UKCCIS guidance "Sexting in schools and colleges, responding to incidents, and safeguarding young people" 2016]

Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted.

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

### **Allegations of a safeguarding nature**

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

The allegation:

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

Tumblewood School and Community maintains safeguards to reduce the likelihood of peer on peer allegations. The educational and therapeutic curriculum is used to educate all residents and day pupils about healthy relationships.

### **Sexual play and experimentation**

Tumblewood recognises that the experiences of many of our young people may contribute to a heightened risk of peer on peer abuse. Age-appropriate sexual play and experimenting may be engaged in; however, occurrences of this nature are closely monitored and recorded in the monthly booklet. The decision to determine whether age appropriate curiosity has crossed over into abuse is not made in an isolated manner and **all** incidents of a sexual nature are recorded in the monthly booklet and reported to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead in their absence.

The presence of one or more of the following points in situations where there has been sexual activity between children should always trigger some concern:

- an age difference of two years or more between the children
- one of the children is significantly more dominant than the other
- one of the children is significantly more vulnerable than the other eg. in terms of disability, confidence, physical strength
- use of threats, bribes or coercion to secure compliance or to maintain secrecy

Tumblewood supports victims of peer on peer abuse and where a child makes an allegation of abuse against another child, Tumblewood staff will:

1. ensure that both children are safe and separated from each other: place in separate classes in school and consider 1:1 support for both children in the care setting
2. inform the DSL or the Deputy Designated Safeguarding Lead in their absence, immediately and complete a disclosure form and, after a preliminary phone call, send it to the local MASH
3. inform the relevant social worker(s)
4. make a record on the safeguarding database and nominate a Manager/DSL/ Deputy Designated Safeguarding Lead as lead person
5. following a response from the MASH, investigate (by Manager/DSL/ Deputy Designated Safeguarding Lead in their absence), providing MASH has not referred on to the police for investigation
6. inform both children of the outcome of the investigation
7. discuss the allegation in Integrated Treatment Planning meeting (ITP) and agree relevant safeguarding measures
8. update the safeguarding log once the matter is closed and all relevant parties informed

## **4.9 Sexting**

Sexting can be defined as: "Images or videos generated by children under the age of 18, or of children under the age of 18 that are of a sexual nature or are indecent". These images are shared between young people and/or adults via a mobile phone, handheld device, computer or tablet, or website with people they may not even know. At Tumblewood school and community any instances or concerns are reported to the Designated Safeguarding Leads or Deputy Designated Safeguarding Lead in their absence without delay.

Tumblewood does not search, print out, save or move suspected sexting materials.

Tumblewood will:

- confiscate and secure the device(s) if necessary
- follow a dynamic risk assessment
- switch the device off as soon as possible to prevent information being removed remotely
- record the incident

**No staff, Head Teacher or Registered Manager is to view the image unless there is a clear reason to do so (for example to establish that there has been an incident which requires further action).**

**The material is ONLY to be viewed with an additional adult present AND the additional adult is NOT to view the image.**

**Tumblewood Community and School support girls and therefore UNDER NO CIRCUMSTANCES ARE MALE STAFF TO VIEW IMAGES.**

#### **4.10 Forced Marriage**

Forced Marriage became a criminal offence in June 2014. It is a form of child, adult and domestic abuse.

Tumblewood is sensitive to differing family values, lifestyles and child-rearing patterns that vary across different racial, ethnic and cultural groups. However child abuse cannot be condoned for religious or cultural reasons.

If a case of forced marriage is suspected it is to be viewed as a safeguarding concern and managed according to safeguarding procedures.

The registered manager, DSL or Deputy Designated Safeguarding Lead in their absence should be informed immediately and will take the appropriate action. IN NO CIRCUMSTANCES are parents or carers to be approached except by Registered Manager or DSL or instructed by them, or the matter discussed with parents or carers, and parents or carers are NOT to be notified of referral to outside agencies unless Registered Manager, DSL or Deputy Designated Safeguarding Lead in their absence instructs this.

#### **4.11 E-Safety**

Tumblewood community and school views E-Safety as a safeguarding issue, not an ICT issue, and has a duty to ensure that young people are kept as safe within the 'virtual' or digital world as they are in every other aspect of their life.

The school and community ensures that appropriate filtering methods are in place to protect pupils from all types of inappropriate and unacceptable materials, including terrorist and extremist material. This is reviewed regularly by Registered Manager and DSLs.

#### **4.12 Sexual Violence and Sexual Harassment between children**

The following is taken from Department of Education December 2017 document.

1. Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
2. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Schools and colleges should consider the following:

- It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys. Schools and colleges should be aware of the importance of:
  - making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
  - not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
  - challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia . Dismissing or tolerating such behaviours risks normalising them.

Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times<sup>6</sup> more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
- communication barriers and difficulties overcoming these barriers.
- Children who are Lesbian, Gay, Bi, or Trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence in this advice, we do so in the context of child on child sexual violence as referred to under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

5. **What is consent?** Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment, which might include: non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Tumblewood supports victims of sexual violence and harassment and where a child makes an allegation of abuse against another child, Tumblewood staff will ensure that both children are safe and separated from each other: place in separate classes in school and consider 1:1 support for both children in the care setting inform, the DSL or the Deputy DSL in their absence, immediately and complete a disclosure form.

School DSL (or deputy DSL in their absence) will follow the appropriate school protocol and Care DSL (or deputy DSL in their absence) will follow the appropriate care protocol.

## **5 Procedure for staff to report a concern about a child**

Tumblewood follows the procedure set out by the Wiltshire Safeguarding & Child Protection Board (WSCB) ‘What to do’ flowchart (*in Appendix 4*)

If any adult in the school or home has a concern about a child the procedure is:

1. Report the concern to the DSL immediately or Deputy DSL in their absence. In their absence speak directly to Children’s Social Care (by contacting the MASH – see contact details on the front page of this policy).

**It is NOT the responsibility of school staff to investigate safeguarding concerns or determine the truth of any disclosure or allegation. All staff and volunteers, however, have a duty to recognise concerns and inform the DSL immediately or Deputy DSL in their absence.**

2. In some circumstances, the DSL, Deputy DSL or member of staff will seek advice from Children’s Social Care by ringing the MASH to obtain advice who may require completion of the WSCB Welfare and Child Protection Concern form [Appendix 9] but more normally the placing local authority will advise what action they require.
3. Record the concern by completing a Tumblewood Concern form’ [Appendix 6] and hand it in to the DSL or Deputy DSL in their absence.

**All records must be signed and dated.**

The DSL or Deputy DSL in their absence should include outcomes and any agreed action that is to be taken.

4. **All Verbal Conversations** are to be documented promptly in writing and dated and timed.
5. The DSL or Deputy in their absence decides on the best course of action and considers a referral to the MASH or Early Help (see section 16 for more information for further information about Early Help).

The DSL or Deputy DSL in their absence will begin a Chronological Record [Appendix 7].

6. When there are concerns **in school** about a child, appendix 5 provides information on the actions taken by Children's Social Care.

**If a child's situation does not appear to be improving it is the duty of the staff member with concerns to insist on further action and re-consideration by Social Services.**

### **Harm to a child by an adult at Tumblewood**

Tumblewood recognizes the possibility that adults working in both care and the school may harm children.

- Any concerns about the conduct of other adults are to be reported immediately to the Head Teacher AND the Registered Manager or the Deputy Manager in their absence.
- Any concern about the Head Teacher is to be reported to the Responsible Individual and Registered Manager or Deputy in the Registered Managers Absence.
- Any concern about the Registered Manager is to be reported to the Responsible Individual - Sue Hortop.
- Where there are concerns in regards to either the Directors or the Responsible Individual, the member of staff should contact the Local Authority Designated Officer.

## **6 Record keeping of child protection concerns**

Tumblewood commits to:

- Keeping clear written records of all child safeguarding and child protection concerns. Tumblewood School uses
  - a. the Tumblewood Child Protection/Safeguarding Concern form, with a body map [Appendix 6] including actions taken and outcomes as appropriate, and
  - b. Chronological Record [Appendix 7]
- Ensuring all child safeguarding and child protection records are kept securely in a locked location. The record is signed and dated and kept in a file under the child name (not family files) away from all other records.
- The DSL or Deputy DSL in their absence is responsible for ensuring that concerns and discussions are written up properly and acted on appropriately.



## 7 Responding to disclosures: guidance for staff

### DO

- Take the child to a private and safe place
- Stay calm
- Reassure the child and stress that she is not to blame and they were right to tell you
- Listen to the child and tell them that you believe them
- Tell the child that you have to speak to someone who can help to keep them safe
- DO NOT interview the child. Keep questions to a minimum and encourage the child to use her own words. Questioning should only include TED questions:

**T**ell me  
**E**xplain  
**D**escribe

or use the mirroring technique: i.e. "My dad hit me last night"; respond by "Your dad hit you last night?"

- Record as soon as possible exactly what the child has said to you or what you have heard or seen, and any other relevant information
- Immediately inform the DSL (and nobody else) so that any appropriate action can be taken to protect the child if necessary
- Ensure the child understands she is not in any trouble and that she has done the right thing to talk about it to an adult

### DO NOT

- Investigate the issue yourself
- Ask the child to write down what they said or repeat it to another adult
- Record the conversation on any device
- Ask another adult to witness their disclosure – the child has chosen to tell you.

## 8 Sharing concerns with parents and carers

For government guidance please refer to: 'Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2015'

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419628/Information\\_sharing\\_advice\\_safe\\_guarding\\_practitioners.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safe_guarding_practitioners.pdf)

Tumblewood Community is committed to working in partnership with parents and carers, and in some situations it may be appropriate to discuss initial concerns with them. However there will be some

circumstances where the DSL or Deputy DSL in tier absence will not seek consent from the individual or their family, or inform them that the information will be shared.

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult

**The above applies to Day Pupils.**

**For Children in Care**, the social worker is to be informed immediately of any disclosures, allegations or concerns, and the social worker will advise whether parents can be informed.

## 9 Managing Allegations against Adults

An allegation of abuse will be dealt with in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

In some circumstances the member of staff will, without prejudice, be asked to take a period of paid leave pending the results of the investigation. This will depend on the circumstances surrounding each individual allegation.

Tumblewood will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Malicious allegations against staff will be investigated and dealt with by the Registered Manager or Deputy Manager in their absence and DSL or Deputy DSL in their absence.

Tumblewood Community follows the procedure set out by the WSCB 'Allegations against adults' flowchart (*in Appendix 9*). The flowchart is based on WSCB Allegations Management Policy.

Where anyone in the home/school has a concern about the behaviour of **an adult who works or volunteers at the home/school**, they must immediately consult the Registered Manager or Deputy Manager in their absence, who will refer to the Designated Officer For Allegations (DOFA):

**Wiltshire Designated Officer For Allegations: 01225 713945**

### **If you have concerns about a colleague**

Staff may worry that they have misunderstood the situation and whether a report could jeopardise their colleague's career. All staff must remember that **the welfare of a child is paramount**. Staff members with concerns about another staff member or volunteer **MUST** report it immediately using the procedure described above.

## 10 Whistleblowing

Where there are concerns about the way that safeguarding is carried out, staff should refer to the Whistleblowing Policy. Staff are to read and familiarise themselves with the Whistleblowing policy.

Whilst the Allegation Management procedure described can be used when the behaviour of an adult causes a concern, all staff and volunteers should also feel able to raise concerns about poor or unsafe practice and potential failures in the school/care provision safeguarding regime (or whistleblowing).

“Keeping Children Safe in Education (KCSiE) 2016” sets out that in the first instance concerns about poor or unsafe practice must be raised with Tumblewood’s senior leadership team. The staff member responsible for dealing with whistleblowing concerns, is the Registered Manager/Head teacher.

Where a staff member feels unable to raise an issue with the Registered Manager/Head teacher or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them such as approaching the Directors or Tumblewood Board representatives.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- an legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed

## Worried about a child?

Contact our trained helpline counsellors for 24/7 help, advice and support.

[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

0808 800 5000

**Report a concern**

If you are worried about a child, in the first instance contact the Registered Manager or Head Teacher, or Responsible Individual, or Deputy Manager in their absence.

Tumblewood Director: **Sue Hortop**

If you wish to report a concern independently of Tumblewood you can discuss the matter with an NSPCC counsellor by calling

**0808 800 5000**

The **NSPCC whistleblowing advice line** is available to provide **advice** to those who do not feel able to raise concerns regarding child protection failures internally

**Whistleblowing Advice Line**

Free advice and support for professionals concerned about how child protection issues are being handled in their organisation.

[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## 11 Staff Safeguarding training

### New Employees

All new employees are given an induction programme which includes Tumblewood policies and procedures, including the Safeguarding & Child Protection Policy, the Code of Conduct, and Keeping Children Safe in Education Part 1.

Tumblewood is clear about the expectations of staff in how they carry out their roles and responsibilities. Training is refreshed at regular intervals according to the role and responsibilities, by estudy, in-house training, and externally training providers.

Designated Safeguarding Leads	Formal training on a 2 year cycle Knowledge and skills refreshment at least annually
Human Resources and Managers	Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process
All other staff	Regular safeguarding and child protection updates at least annually

## 12 Safer Recruitment

All staff involved with recruitment follow Tumblewood's Safer Recruitment policy. The safe recruitment of staff at Tumblewood is the first step to safeguarding and promoting the welfare of children in education, care and therapy. Tumblewood is committed to safeguarding and promoting the welfare of all students in its care. As an employer, Tumblewood expects all staff and volunteers to share this commitment.

Tumblewood's aim is

- the best possible staff are recruited on the basis of their merits, abilities and suitability for the position
- all job applicants are considered equally and consistently
- no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age
- compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2016 (KCSIE), the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS)
- meet its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks

Tumblewood applies the requirements of Part 3 Safer Recruitment of "Keeping Children Safe In Education" DfE 2016. All statutory and appropriate measures are applied in relation to everyone who works across the site who is likely to be perceived by the children as a safe and trustworthy adult including volunteers

and staff employed by contractors.

## 13 Safer working practice

Tumblewood follows HM and DfE guidance “Working together to Safeguard children” 2015 and “Keeping Children Safe In Education” 2016. All statutory and appropriate measures are applied in relation to everyone who works across the site who is likely to be perceived by the children as a safe and trustworthy adult including volunteers and staff employed by contractors.

All members of staff and volunteers are required to read, sign and understand Tumblewood’s Code of Conduct, Safeguarding policies and Keeping Children Safe in Education Part 1, and are signposted to all Tumblewood policies.

## 14 Photography and images

Under no circumstances are staff expected or allowed to use their personal equipment to take images of children at or on behalf of Tumblewood. Staff and volunteers in the home/school **MUST**:

<b>✓</b>	Seek parental (or social worker, where appropriate) consent for photographs to be taken or published
<b>✓</b>	Only use home/school equipment
<b>✓</b>	Ensure that children are appropriately dressed
<b>✓</b>	Encourage children to tell us if they are worried about any photographs that are taken of them
<b>✓</b>	Only retain images when there is a clear and agreed purpose for doing
<b>✓</b>	Only retain images when there is a clear and agreed purpose for doing so
<b>✓</b>	Store images in an appropriate secure place in the home/school

Staff and volunteers should **NOT**:

<b>X</b>	Take images in one to one situations
<b>X</b>	Take images of children for their personal use
<b>X</b>	Share images of children unless specific consent has been given

At school events where parents and carers may take photographs of children, a statement is to be signed by parents that these are to be for personal use only (ie. not to be shared on social media for example).

For more information, please see Code of Conduct.

## 15 Children with Special Educational Needs or Disabilities (SEND)

Tumblewood recognises that for a variety of reasons, children with additional needs face an increased risk of abuse and neglect; therefore adults are expected to take extra care to correctly interpret apparent signs of abuse or neglect. Additional barriers can exist when recognising abuse and neglect in children with SEND. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- children with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers

Tumblewood provides a school environment in which children with SEND feel confident and able to discuss their concerns. Whenever possible, children will be given the chance to express themselves to a member of staff with appropriate communication skills. The DSL will work with the Special Educational Needs Co-ordinator (Head Teacher) to identify children with particular communication needs.

Wiltshire Council provides targeted support services for children with SEND who need additional support:

**SEND Service: 01225 757 985**

## 16 Welcoming other professionals

Visitors with a professional role will be appropriately vetting by their own organisation. Visiting professionals are asked to provide evidence of their professional role and employment details (an identity badge for example), and complete signing in/out forms and wear a Tumblewood visitors badge. Tumblewood may, at its discretion, contact the relevant organisation to verify the individual's identity.

Each visitors badge is numbered and also has a time limit on it eg. valid for 1 day only, valid for 1 week etc. If visitors stay on premises beyond normal working hours, it is shift leaders' responsibility to make sure the visitor signs out and returns their badge.

Regular visitors eg. contractors, are issued with a photo badge it (as for staff), to avoid the necessity of issuing a new visitor badge each time they visit.

## 17 Off site visits

Tumblewood encourages children to part in children's clubs, cadets, sports, visit friends etc. away from Tumblewood. Before any visit off site is agreed a risk assessment must be in place and approved by the Registered Manager and Compliance Officer.

### Overnight visits

The risk assessment for an overnight visit MUST explicitly set out:

- sleeping arrangements
- the role and responsibility of each adult, whether employed or volunteers
- on/off duty arrangements
- clear expectations about boundaries and interactions with children; and expectations around code of conduct by adults eg. smoking/drinking

Any safeguarding concerns or allegations resulting from visits off site must be reported as soon as possible to the Registered Manager/ Designated Safeguarding Lead, following the guidance presented earlier in this document under Sections 4 and 5, and the Registered Manager/ Designated Safeguarding Lead will make a decision whether referral to the MASH or Designated Officer For Allegations (DOFA) is appropriate.

## **18 Visits to site by children's friends**

Tumblewood aims to replicate as normal a home life as possible for the children in its care, and part of this normal life includes allowing children's friends to visit them here at Tumblewood. It is important that other children resident at Tumblewood are in agreement with visits by a child's friend, and consultation must be made with them before the visit can be agreed.

A risk assessment must be put in place and approved by the Registered Manager but the process should not be unduly stringent.

The friend's parents or carers must be in agreement to the visit and understand the environment at Tumblewood. Visits can only take place by prior agreement with the Registered Manager in accordance with the resident child's care plan and risk assessment.

Where carers consent to a child's friend visiting during their shift, they must sign agreement to this with the Registered Manager. Carers must also ensure they know the areas within Tumblewood that the visiting friend is and is not permitted to access.

## **19 Policy review**

The Safeguarding & Child Protection policy and its procedures are reviewed annually by Registered Manager, Head Teacher and Compliance Officer and approved by the board of directors.

A log of policies and review dates is maintained by the Compliance Team.

Immediate updates are made as required.

## **20 Staff Undertaking**

All staff are required to receive (including updates), read and continually refer to:

- Keeping Children Safe in Education Part 1
- Tumblewood Code of Conduct
- Tumblewood Child Protection and Safeguarding policy
- All Tumblewood policies

All staff are required to know:

Where to look for legislative and Statutory guidance  
What action to take if concerned a child is being abused  
The role of the Nominated Director [Appendix 1] and how to contact them  
The role of the Designated Safeguarding Lead [Appendix 2] and how to contact them

All staff are required to:

- Undertake supervision at intervals suited to their job role and Job Description
  - Undertake and update training when requested
  - Ensure that all incidents or concerns are reported promptly using the prescribed procedure
  - Take personal and corporate responsibility for the safety and welfare of the children
-



**APPENDIX 1:****The role of the Nominated Director for Safeguarding**

Tumblewood has appointed a Nominated Director (ND) for safeguarding, as required by statute, to take leadership responsibility for the organisation's safeguarding arrangements.

This ND's role is to ensure safeguarding is always a priority by:

- Championing child protection issues within the school and liaising with the DSL and the Head Teacher and offering challenge if necessary
- Ensuring the Child Protection policy is checked for impact and reviewed yearly accordingly
- Auditing safeguarding measures annually alongside the DSL and the Head Teacher using the Wiltshire Council annual school safeguarding audit return and reporting back to Board of Directors
- Auditing Tumblewood's safeguarding database
- Ensuring that all teachers understand and comply with their statutory duty to provide the services of the school in a way that safeguards and promotes the welfare of Children.

The Nominated Director for Tumblewood Community and School is: **Sue Hortop**

**APPENDIX 2:****The role of the Designated Safeguarding Lead (DSL)**

The Designated Safeguarding Lead is a senior member of staff designated to take lead responsibility for safeguarding and child protection at Tumblewood.

The key role of DSL is to:

- Manage all child protection issues – internal and external
- including referring cases to the MASH, or to the Channel programme where there is a radicalisation concern
- Liaise with others within the school/care provision (Head Teacher, Registered Manager, Directors & Board members, staff and volunteers, parents and social workers)
- Support staff who make referrals to the MASH, or Channel programme
- Work in partnership with other agencies such as the local authority, MASH, police, Channel, Local Safeguarding Children Board
- Undertake training
- Raise awareness of safeguarding, by regularly reviewing the safeguarding policy and procedures, ensure availability to staff and parents/social workers
- Induction of staff and volunteers/staff training/ensure staff are aware of safeguarding policy and procedure
- Maintain and transfer safeguarding files safely

The Designated Safeguarding Leads for Tumblewood Community and School are

**Polly Atkins** Registered Manager

**Jen McMillan** Head Teacher

**Jackelyn Bradley** Deputy Manager (Deputy DSL)

**Information sharing –internal process**

Information concerning children at risk of harm will be shared with all members of staff on a “need to know” basis. The DSL or Deputy DSL in their absence will make a judgement in each individual case about who needs and has a right to access particular information. In terms of the care provision (out of school), safeguarding concerns are highlighted at the daily Risk Management meeting and taken forward by DSL for Care or the Deputy DSL in their absence.

Staff must promptly share their concerns in writing with DSL or Deputy DSL in their absence according to procedure above. ALL verbal conversations must be promptly recorded in writing. The Management of any allegation or concern internally or externally is the same process. The forms for reporting a concern can be found on the internal network.

**More information about the role of the DSL can be found in KCSiE 2016**

**APPENDIX 3:****Indicators of abuse and neglect**

“What to do if you are worried a child is being abused” 2015 provides definitions and indicators of the categories of abuse and neglect. Some of the signs below may be indicative of abuse:

**Physical abuse:**

- Children with frequent injuries
- Children with unexplained or unusual fractures or broken bones
- Children with unexplained:
  - bruises or cuts
  - burns or scalds
  - bite marks

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Physical abuse can also occur outside of the family environment.

**Emotional abuse:**

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong
- Parents or carers who withdraw their attention from their child, giving the child the ‘cold shoulder’
- Parents or carers blaming their problems on their child
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons

Emotional abuse may involve serious bullying – including online bullying through social networks, online games or mobile phones – by a child’s peers.

**Sexual abuse:**

- Children who display knowledge or interest in sexual acts inappropriate to their age
- Children who use sexual language or have sexual knowledge that you wouldn’t expect them to have
- Children who ask others to behave sexually or play sexual games
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy

Be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such.

A child may not understand what is happening and may not even understand that it is wrong.

**Neglect:**

- Children who are living in a home that is indisputably dirty or unsafe
- Children who are left hungry or dirty
- Children who are left without adequate clothing, e.g. not having a winter coat
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence
- Children who are often angry, aggressive or self-harm
- Children who fail to receive basic health care
- Parents who fail to seek medical treatment when their children are ill or are injured
- Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse

Children who are neglected often also suffer from other types of abuse.

Neglect may occur if a parent becomes physically or mentally unable to care for a child.

A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child.

**Specific safeguarding issues:** "KCSiE 2016 Annex A" provides definitions and indicators of specific safeguarding issues. Some of the signs below *may* be indicative of abuse:

#### **Child Sexual Exploitation (CSE):**

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- 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
- Children who regularly miss school or education or don't take part in education

#### **Female genital mutilation (FGM):**

##### **Indicators that a child or young person may be at risk of FGM:**

- Knowing that the family belongs to a community in which FGM is practiced and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from school
- The child may also talk about a special procedure/ceremony that is going to take place or a special occasion to 'become a woman'
- Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject

##### **Indicators that FGM may already have occurred:**

- Prolonged absence from school or other activities with noticeable behaviour change on return, possibly with bladder or menstrual problems
- Difficulty walking, sitting or standing, and look uncomfortable
- Spend longer than normal in the bathroom or toilet
- May complain about pain between their legs, or talk of something somebody did to them that they are not allowed to talk about

#### **Preventing radicalisation:**

Extremism can take several forms, including Islamist extremism and far-right extremism.

**Radicalisation** is the process by which a person comes to support terrorism and forms of extremism.

- There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology
- Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer
- The internet and the use of social media in particular has become a major factor in the radicalisation of young people

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Radicalisation of young people can be compared to grooming for sexual exploitation.

**Early indicators may include:**

- Vulnerability and social factors, such as:
  - family or local community tensions
  - low self-esteem
  - experience of poverty, disadvantage, discrimination, social exclusion / perception of injustice
- Access to extremist influences or showing sympathy for extremist causes
- Advocating messages similar to illegal organisations
- Evidence of accessing / possessing illegal or extremist material (including online)
- Justifying the use of violence to solve societal issues
- Pattern of regular or extended travel to locations known to be associated with extremism
- Significant changes to appearance, behaviour and peer relationships.

**Online safeguarding training (specific safeguarding issues):**

- **Child Sexual Exploitation:** <https://keepthemsafe.safeguardingchildren.co.uk/>
- **Female Genital Mutilation:** <https://www.fgmelearning.co.uk/>
- **Prevent:** [www.elearning.prevent.homeoffice.gov.uk](http://www.elearning.prevent.homeoffice.gov.uk)  
New Home Office e-learning tool, aimed at those with responsibilities under the Prevent duty, particularly front line staff in schools, has been developed to help raise awareness of radicalisation.

**Private fostering**

Under certain conditions, a child might be cared for, as part of a private arrangement, by someone who is not their parent or a 'close relative'. This constitutes private fostering when the following conditions are met:

- a child is under 16 years of age – 18 if they have a disability
- the arrangement is for 28 days or longer
- the child's new carer does not have parental responsibility for the child and is not a close relative.

Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity).

There is a mandatory duty to inform the local authority of private fostering arrangements to safeguard and protect the child's welfare as well as ensuring the child, carer and parent are receiving appropriate support and help.

There is no duty for any placing Authority or foster carers to inform the school that a child may be in private foster care: however on admission to the Tumblewood, steps will be taken to verify the relationship of the adults to whom the child who is being registered.

If Tumblewood becomes aware that a child or young person is being privately fostered, the carer/parent will be informed of their legal duty to notify Wiltshire Children's Social Care; Tumblewood will follow this up by contacting Children's Social Care directly.

**APPENDIX 4: WSCB flowchart**

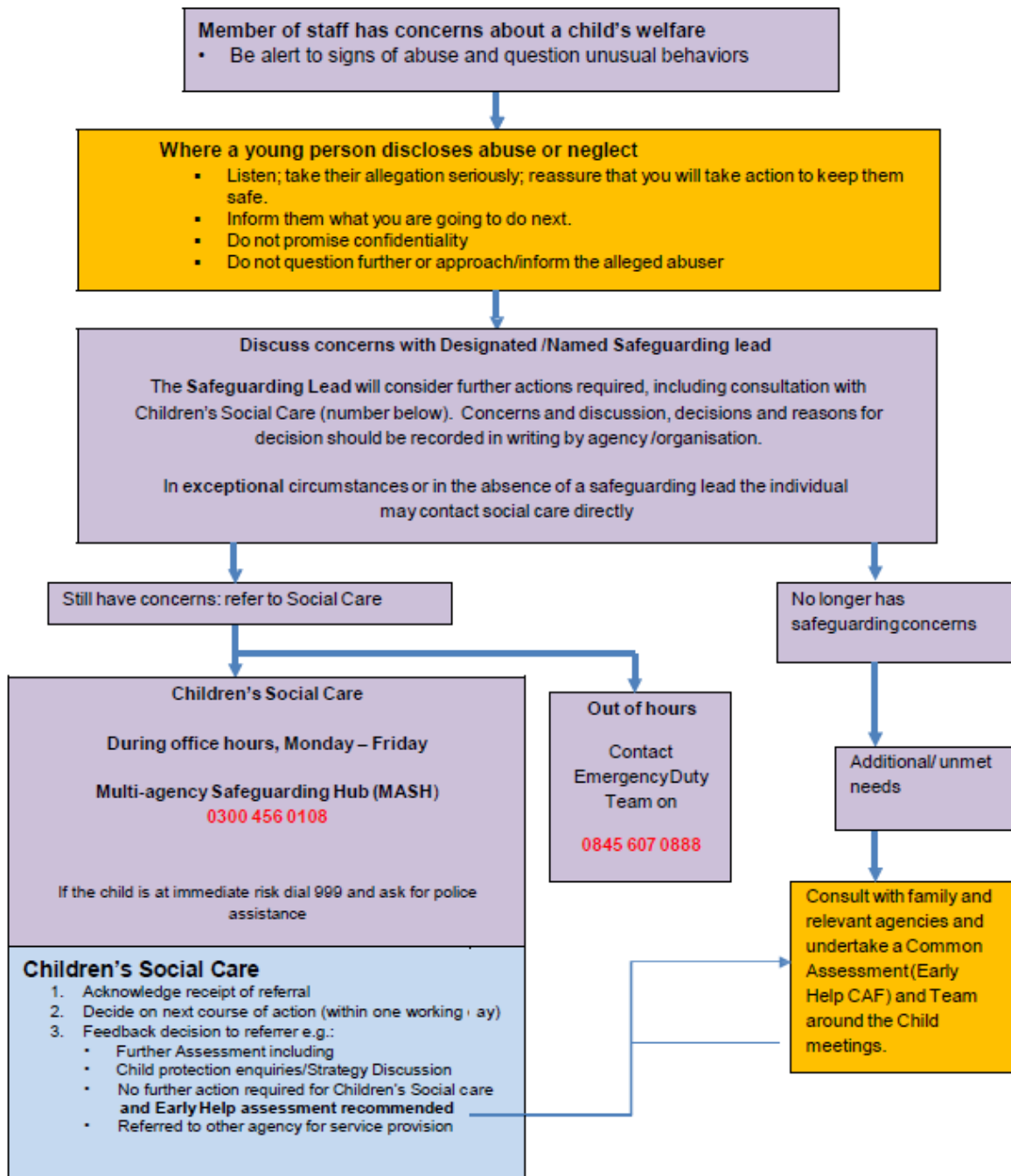
**‘What to do if you’re worried a child is being abused/neglected’**

\*\* Where the DSL is referenced, please note that in the DSL’s absence it will be the Deputy DSL



**WILTSHIRE SAFEGUARDING CHILDREN BOARD**

**What to do if you are worried a child is being abused or neglected**

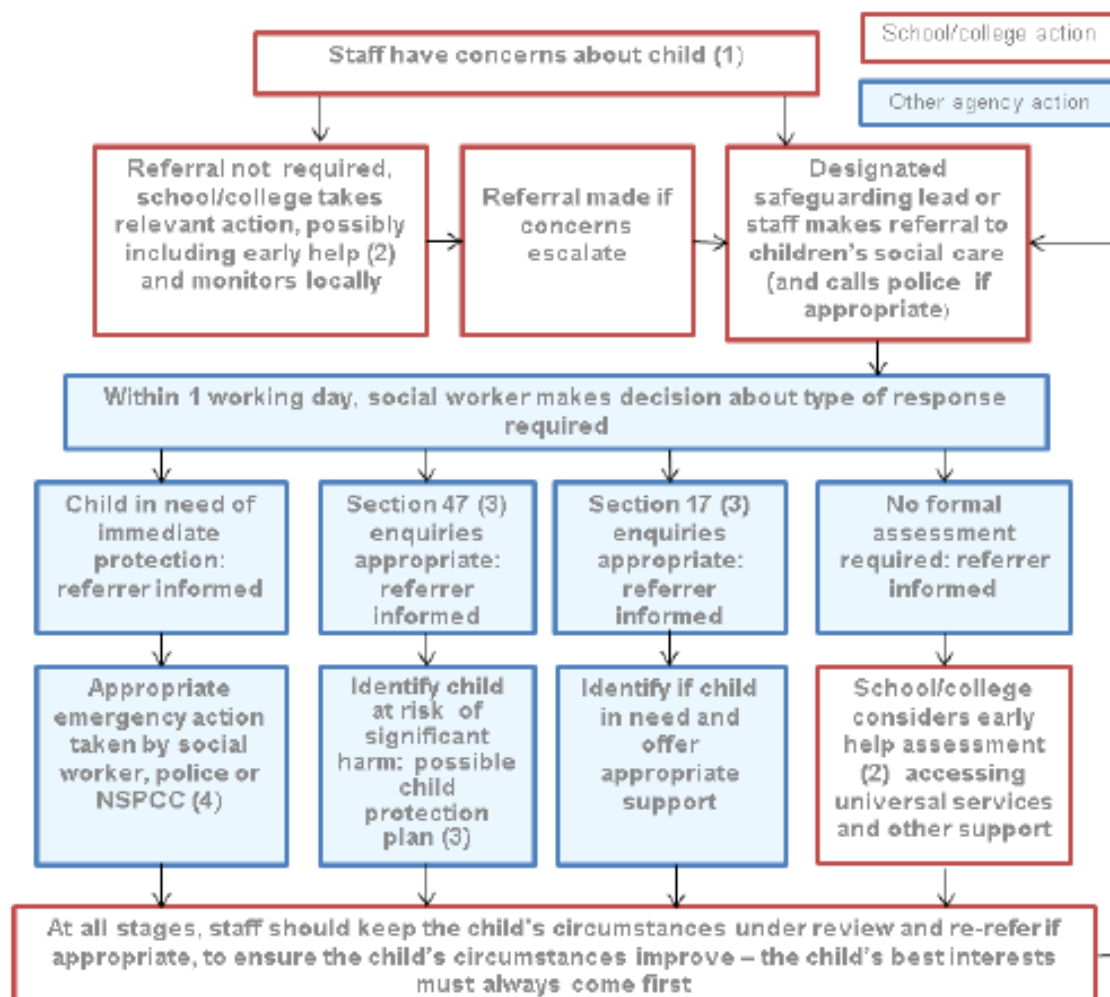


This flowchart is intended for use as a brief guide. Please refer to the DfE Guidance ‘What to do if you’re worried a child is being abused’ guidance, which includes definitions and possible indicators of abuse (including child sexual exploitation) at: [www.wiltshirelscb.org](http://www.wiltshirelscb.org)

A114/15 Updated Sept 2016/Review date Sept 2017

**APPENDIX 5: School concerns (WSCB flowchart)**

\*\* Where the DSL is referenced, please note that in the DSL's absence it will be the Deputy DSL

**Actions where there are concerns about a child**

1. In cases which also involve an allegation of abuse against a staff member, see Part four of this guidance.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working together to safeguard children](#) provides detailed guidance on the early help process.
3. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include s17 assessments of children in need and s47 assessments of children at risk of significant harm. Full details are in Chapter one of [Working together to safeguard children](#)
4. This could include applying for an Emergency Protection Order (EPO).

**APPENDIX 6: Tumblewood Concern/Suspicion form**


<b>Child Protection/Safeguarding Concern or Suspicion</b>			
Child's Name			
Date of Birth		Date & Time of Disclosure/Allegation	
CP/Safeguarding Log Reference Number			
Reasons for Concern or Suspicion.			
Date/Time	What, Why, When, Who <i>(include any relevant contact names and phone numbers)</i>		
Name of person completing this report		Name of Person this report was passed on to...	
Signed		Date	



**APPENDIX 7: Tumblewood Concern -Chronological Record**

<b>Child Protection/Safeguarding Concern – Chronological Record</b>			
Child's Name			
Date of Birth		Date & Time of Disclosure/Allegation	
CP/Safeguarding Log Reference Number			
Actions and Follow up.			
Date/Time	Action Taken/ Decision made/ Who by. <i>(include contact names and phone numbers)</i>	Staff Initials	

Date	Action Taken/ Decision made. <i>(include contact names and phone numbers)</i>	Staff Initials

			
Name of person completing this report		Name of Person this report was passed on to...	
Signed		Date	

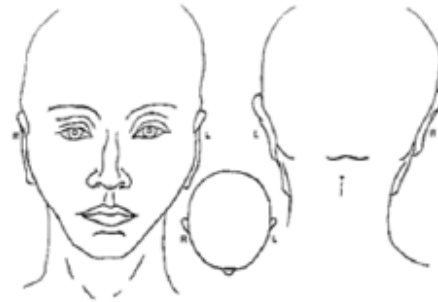
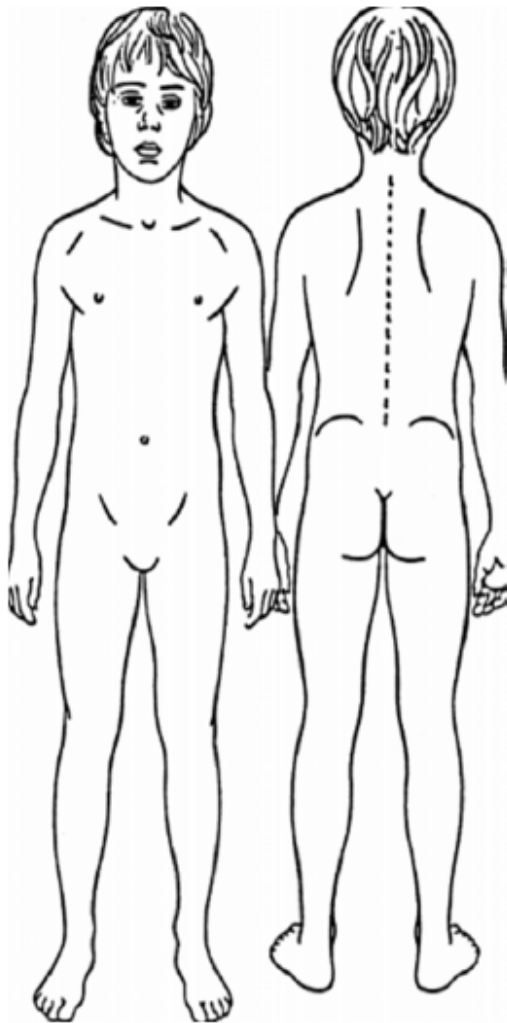
**APPENDIX 8:****WSCB Welfare and Child Protection Concern form****NB.** This form is completed online only when a referral is made to the MASH**Child Welfare and Child Protection Concern Record**

*For completion where child welfare or child protection concerns are identified in accordance with the agency child protection policy. This record should be completed by the adult who first observed the concern and reported to the agency safeguarding lead without delay. The agency Safeguarding lead will review and report concerns where appropriate to Children's Social Care if a child is deemed to be in need or at risk of significant harm or in need. This information will be disclosed only to those staff who need to know for the purposes of child protection. Where there is no agency safeguarding lead available or in place consult with /refer to MASH where there are concerns about a child being at risk of harm.*

**Please note that a new form is required for each new concern**

Date of alleged incident/disclosure/concern		Date/time of report	
Name of child/ren		DOB	
Child's address			
Name of person making this record (PLEASE PRINT)		Role in Agency	
Signed as a true record		Date DD/MM/YY	
Nature of concern  Attach additional sheet(s) if necessary  <i>(include observations, child's own words where possible; exact words must be used even if they offend)</i>  Please write legibly and do not use acronyms.			
Body map used:	Y N		
Any other relevant information (previous concern, other professionals involved/SEN details etc.)			
Current status with Early Help or Children's Social Care (please tick & add name where known)	None	CAF	Y N
		Known to Social Care	Y N
		Allocated social worker	Y N
		Child Protection Plan	Y N
<b>This section is to be completed by the agency Safeguarding Lead</b>			
Name of Safeguarding Lead reviewing the concern			Date:
Concerns should be shared with parent/child, unless to do so may place a child/ren at increased risk of harm (if in doubt consult with children's social care).			
Further action taken Please also record whether concerns were shared with: • parents/carers • MASH and if not outline reason(s)			Date:
Final outcome			Date:

Body Map to be completed by the person raising the concern or observing injuries			
<b>PLEASE NOTE: CHILDREN ARE NOT TO BE UNDRESSED OR PHOTOGRAPHS TAKEN OF ANY MARKS OR INJURIES</b>			
Date concern noted		Date/time of report	
Name of child		DOB	
Name of person making this record (PLEASE PRINT)		Role in agency	
Signed as a true record		Date DD/MM/YY	

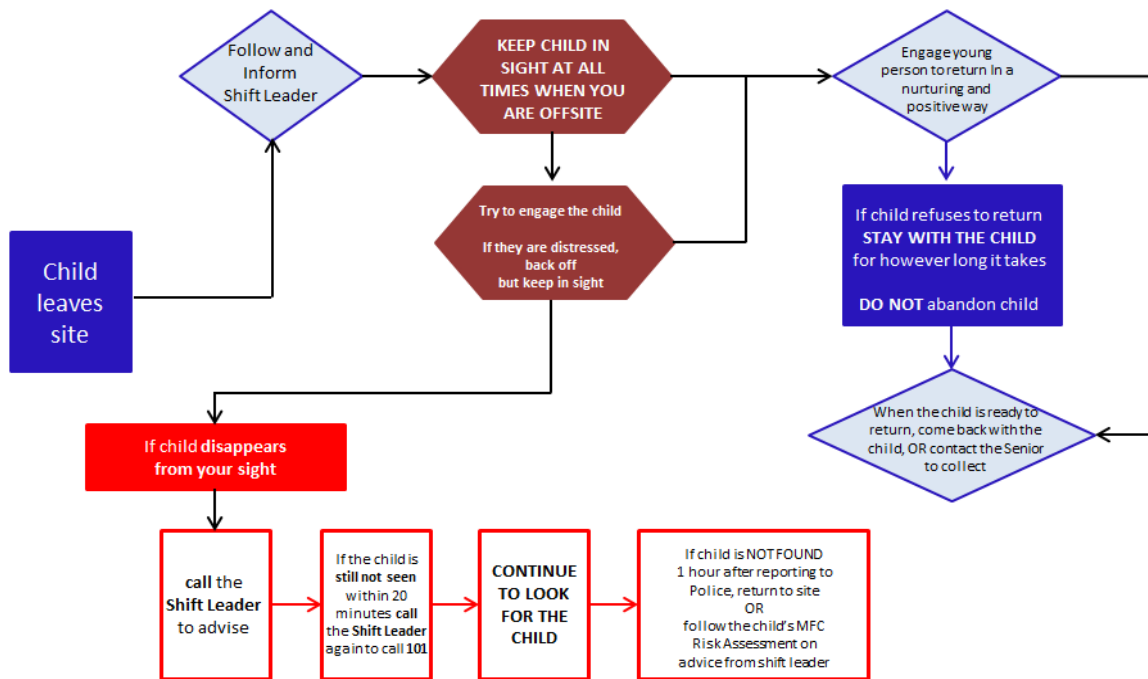


WSCB Welfare and CP Concern Record – September 2016

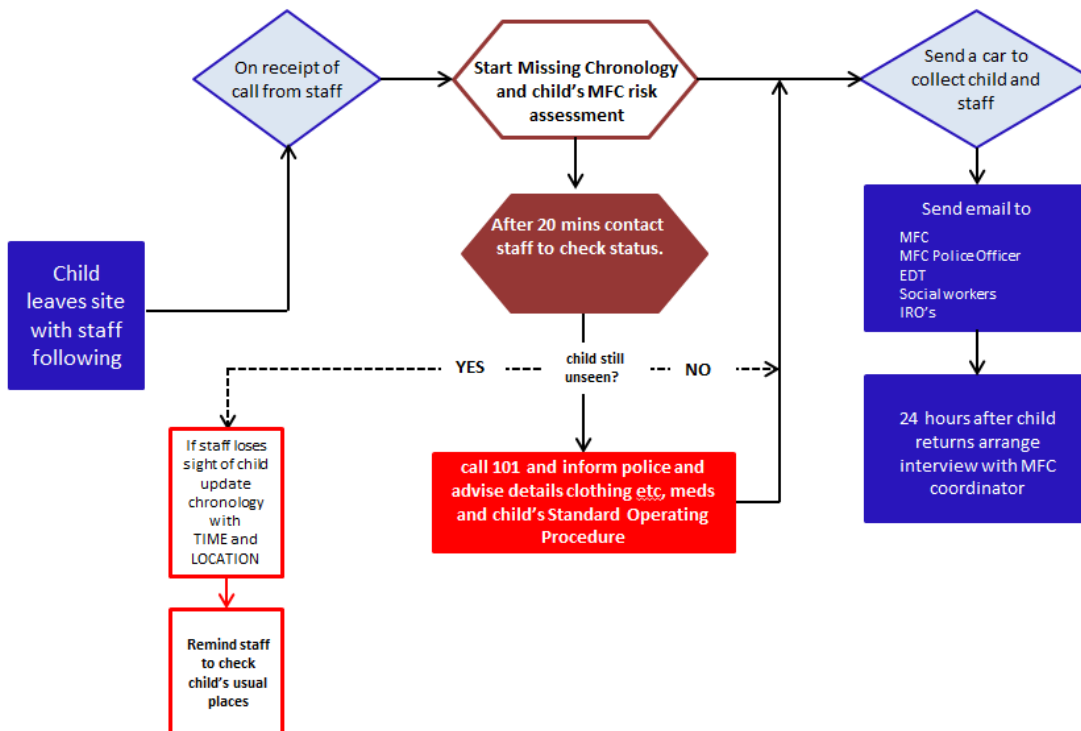
Review date: September 2017

APPENDIX 9:

# Missing From Care - Guidance for Staff



# Missing From Care – Guidance for Shift Leaders



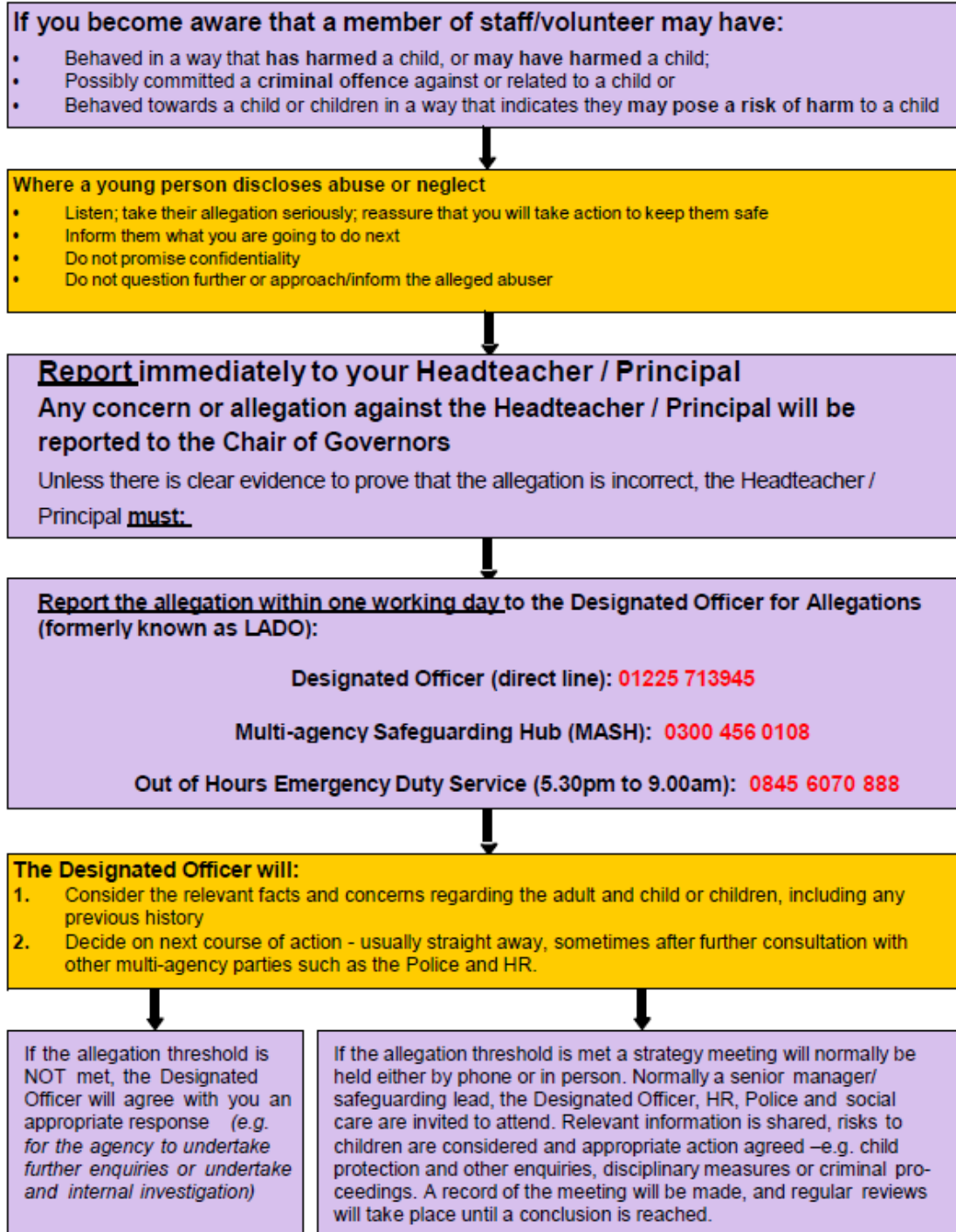
**APPENDIX 10:**

\*\* Where the DSL is referenced, please note that in the DSL's absence it will be the Deputy DSL



**ALLEGATIONS AGAINST ADULTS - Risk of harm to children**

**GUIDANCE FLOWCHART**



**NB: This document is intended for use as a brief guide only. For more detailed guidance refer to The WSCB Allegations Management Policy at [www.wiltshirescb.org](http://www.wiltshirescb.org)**