

Tumblewood Community & School Child Protection & Safeguarding Policy September 2018

KEY SAFEGUARDING PERSONNEL			
Role	Name	Tel	Email
Registered Manager	Polly Atkins (Maternity Leave)	01373 824466	polly.atkins@tumblewood.org
	Jackelyn Bradley (Acting Manager)		Jackelyn.Bradley@tumblewood.org
Head Teacher and designated teacher for looked after children	Jen McMillan	01373 824466	Jennifer.mcmillan@tumblewood.org
Designated Safeguarding Lead - SCHOOL	Jen McMillan	01373 824466	Jennifer.mcmillan@tumblewood.org
Designated Safeguarding Lead - CARE	Jackelyn Bradley	01373 824466	Jackelyn.Bradley@tumblewood.org
Deputy Designated Safeguarding Lead	Claudia Guggenmos	01373 824466	Claudia.Guggenmos@tumblewood.org
Allocated Director	Sue Hortop	01373 824466	sue.hortop@tumblewood.org
Named Safeguarding Governor	Sue Hortop with John Kearney (<i>delegated duties</i>)	01373 824466	sue.hortop@tumblewood.org
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 <u>at immediate risk</u> 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			

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. 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.

The Role of 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 (Maternity Leave)
 Jen McMillan Head Teacher
 Jackelyn Bradley Acting Registered Manager
 Claudia Guggenmos (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 2018

2 Legislative Framework and Guidance

Tumblewood follows the child protection procedures set out by the Wiltshire Safeguarding Children Board and adheres to statutory guidance issued by the Department for Education (DfE) “Keeping Children Safe in Education 2018” and “Working together to safeguard children 2018”. In all instances of Safeguarding the DSL’s understand the importance of ‘contextual safeguarding’ this means our DSL will always consider the wider environmental factors in a child’s life that may be a threat to their safety and/or welfare compared to other children. 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 placement programme.

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

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

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| <ul style="list-style-type: none"> • Anti-bullying policy • Child Exploitation Policy • Contact with Children Policy • Disclosures Policy • E-Safety & Internet Use Policy • Female Genital Mutilation Policy • Missing From Care Policy | <ul style="list-style-type: none"> • Working together to safeguard children 2018 • Keeping children safe in Education (September 2018) • The Serious Crime Act 2015 • Children Missing Education (CME September 2016) • WSCB Allegations Management Policy • HM Government “Information Sharing – |
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Advice for practitioners providing safeguarding services to children, young people, parents and carers" Mar 2015

- Sexual Violence and Sexual Harassment between children May 20018
- Disqualification under the childcare Act (2006) as amended 2018.

This list is not exhaustive.

All staff at Tumblewood have read and understand part 1 and Annex A of Keeping Children Safe in Education (September 2018)

This document is mindful to our commitment to confidentiality and our policy on information sharing which is based upon the DfE guidance ' Information sharing: advice for practitioners providing safeguarding services' (DfE 2018)

The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe (KCSiE 2018p57), this includes allowing practitioners to share information without consent (KCSiE 2018 p77).

3 Safeguarding information for children – the Children's Role

Children at Tumblewood may talk any member of the care or education teams, however they may also talk to:

NYAS visitor	Toni Brodie
Childline	0800 1111
NSPCC helpline	0808 800 5000
NSPCC Whistleblowing helpline	0800 028 0285
Ofsted	0300 123 1231
Childrens Commissioner	0800 528 0731

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. Pupils are to taught to recognise when they are at risk and informed of how to get help when they need it. 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 are the designated safeguarding leads and who has responsibility for child protection.

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> 2018
<ul style="list-style-type: none"> • Physical abuse • Emotional abuse • Sexual abuse • Neglect 	<ul style="list-style-type: none"> • Child Sexual Exploitation • Peer on Peer • PREVENT • FGM • Sexting • Forced Marriage • E Safety • Honour Based Violence • Children Missing Education CME
<p>Any concerns about the conduct of adults should be taken to the DSL or deputy DSL in their absence and any concerns regarding the DSL or Deputy DSL should be taken to the Responsible individual. Any concerns regarding the directors / proprietors / Responsible Individual are to be taken to the Local Authority Designated Officer.</p>	

4.1 Child Sexual Exploitation (CSE)

The Government Guidance: 'Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation February 2017' states the following as a definition for Child Sexual Exploitation:

'Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.'

Indicators of child sexual exploitation may include:

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

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

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.

Warning signs of imminent FGM:

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

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

Symptom indicators 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.

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

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.

Tumblewood staff will ensure that all cases of HBV are taken seriously and it will be reported to the DSL/Deputy DSL immediately.

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.

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. Tumblewood will ensure that all cases of possible radicalisation are taken seriously and treated as a safeguarding issue.

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

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

In all circumstances 'Children Missing in Education' Statutory guidance for local authorities – 2016, is followed for poor attendance or regularly missing school.

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" 2018 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

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:

X	10 days or more continuous absence from school without an explanation
X	left school suddenly and the destination is unknown
X	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 regularly, 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 (if applicable) 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.
There is a flow chart on display in each area of the home.

4.8 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. A high level of support is available to the pupils at all times to help prevent instances of peer-on-peer abuse. All staff are aware of the potential hazards and know what action to take if an issue arises.

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

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.

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 Placement Planning meeting (ITP) and agree relevant safeguarding measures
8. update the safeguarding log once the matter is closed and all relevant parties informed
9. Staff members will meet with the child to explain the outcome of the incident and what steps have been taken to avoid future confrontation.

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.

Staff may find additional guidance in the document UKCCIS Guidance: Sexting in schools and college, responding to incidents and safeguarding young people (2017)

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.

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, parents and carers will not be informed until consultation with the social worker and / or police has occurred

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. Please refer to the E-safety policy, which correlates with Keeping Children Safe in Education 2018.

4.12 Sexual Violence and Sexual Harassment between children

The following is taken from Department of Education May 2018 and Keeping Children Safe in Education 2018 documents:

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 times⁶ 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.

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.

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.

4.13 County Lines Exploitation:

Criminal Exploitation of children and vulnerable adults: County Lines guidance: Home office September 2018:

Tumblewood are aware of and commit to preventing County Lines Exploitation. County lines is a

term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

Some potential indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern::

- persistently going missing from school or home and / or being found out-of-area;
- unexplained acquisition of money, clothes, or mobile phones
- excessive receipt of texts / phone calls and/or having multiple handsets
- relationships with controlling / older individuals or groups
- leaving home / care without explanation
- suspicion of physical assault / unexplained injuries
- parental concerns
- carrying weapons
- significant decline in school results / performance
- gang association or isolation from peers or social networks
- self-harm or significant changes in emotional well-being.

Tumblewood will always take concerns of County Lines Exploitation Seriously and will ensure that safeguarding concern is dealt with in accordance with our safeguarding procedures.

4.14 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).

By law parents and carers must notify 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.

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

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 2*)

It is NOT the responsibility of 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.

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).
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 but more normally the placing local authority will advise what action they require.
3. Record the concern by completing a Tumblewood Concern form' 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.

The DSL or Deputy DSL in their absence will begin a Chronological Record.

6. When there are concerns **in school** about a child, appendix 2 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 Designated Office for Allegations (DOFA)

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 including actions taken and outcomes as appropriate, and
 - b. Chronological RecordEnsuring 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.

The Data protection Act 2018 and GDPR do not prevent, or limit the sharing of information for the purposes of keeping children safe. If necessary information will be shared with all relevant parties when required to do so which includes allowing practitioners to share information without consent.

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:

Tell me
Explain
Describe

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

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 5*). 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. Any relationships or associations that staff have in school and outside (including online), may have an implication for the safeguarding of children in the school. Where this is the case, the member of staff must speak to the headteacher/registered manger.

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.

"Keeping Children Safe in Education (KCSiE) 2018" 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

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

Worried about a child?

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

help@nspcc.org.uk

0808 800 5000

Report a concern

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.

Our induction also includes:

- Plan of support for individuals appropriate to the role for which they have been hired
- Opportunities for a new member of staff to discuss any issues or concerns about their role and responsibilities through supervision
- Confirmation of the line management/mentor process whereby any general concerns or issues about the person's ability or suitability will be addressed.

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 e-study, 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 2018 (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

13 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**:

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

Staff and volunteers should **NOT**:

✗	Take images in one to one situations
✗	Take images of children for their personal use
✗	Share images of children unless specific consent has been given

For more information, please see Code of Conduct.

14 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.

15 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.

16 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.

17 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.

18 Policy review

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

19 Staff Undertaking

The relationship and associates that staff have both within and outside of Tumblewood (including online) may have implications for safeguarding children at Tumblewood, if staff have concerns in regards to any personal safeguarding issues full transparency is required and these must be shared with the DSL or deputy in their absence.

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

- Keeping Children Safe in Education Part 1 and Annex A
- Tumblewood Code of Conduct
- Tumblewood Child Protection and Safeguarding policy
- Access to all Tumblewood policies
- Behaviour Management Policy
- Missing From Care policy

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 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
Adhere to the safeguarding procedure
Report all safeguarding concerns to the DSL or Deputy in their absence.
Adhere to the reporting guidelines in section 5 of this document.

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.

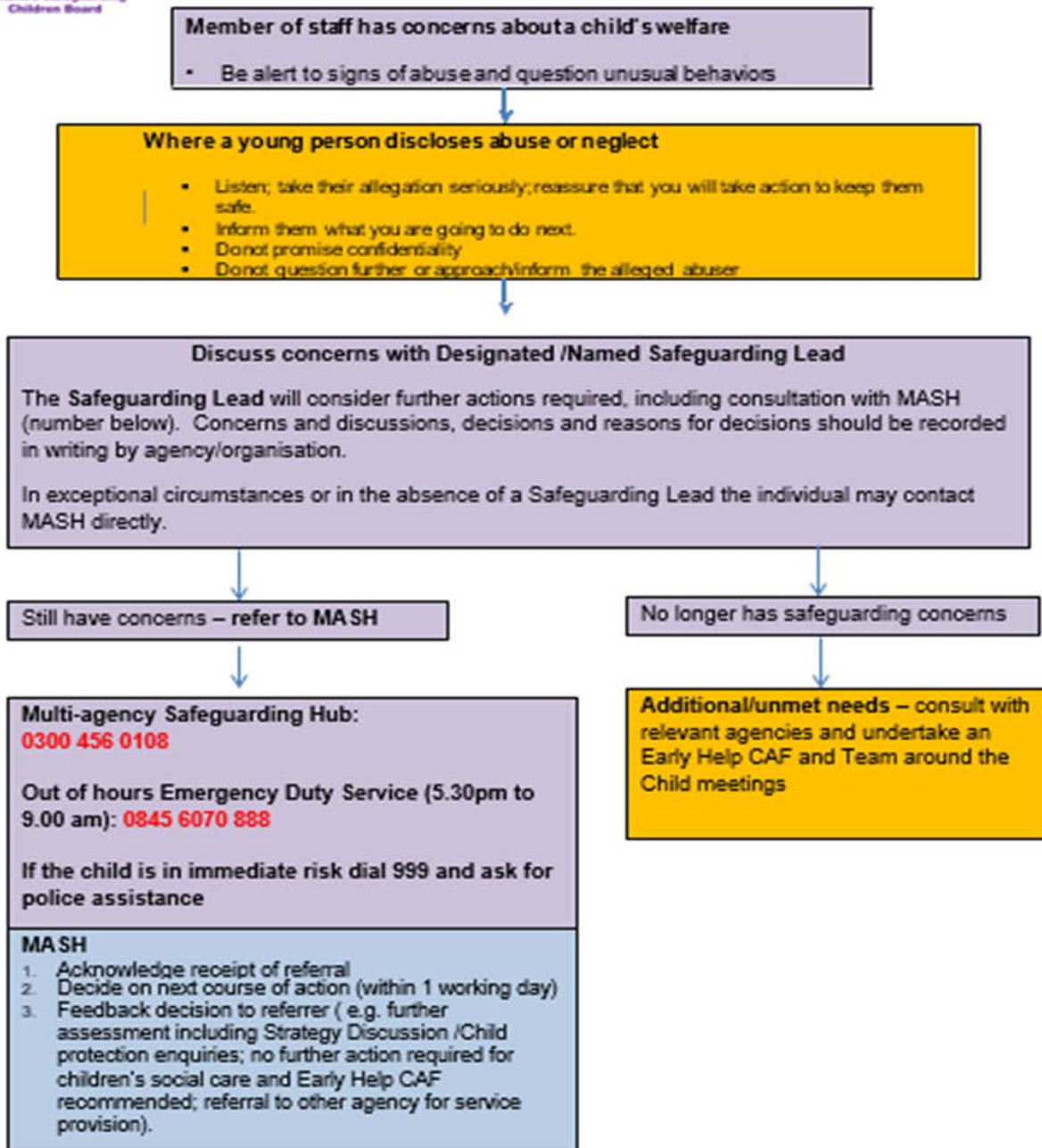
The Nominated Director for Tumblewood Community and School is: **Sue Hortop**

'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



What to do if you are worried a child is being abused and 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), www.wiltshirescb.org

Updated January 2018

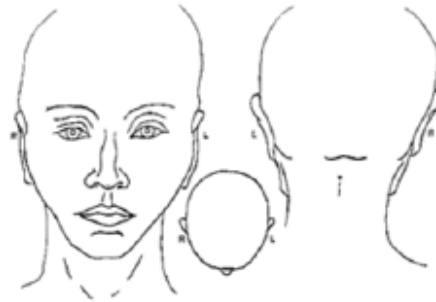
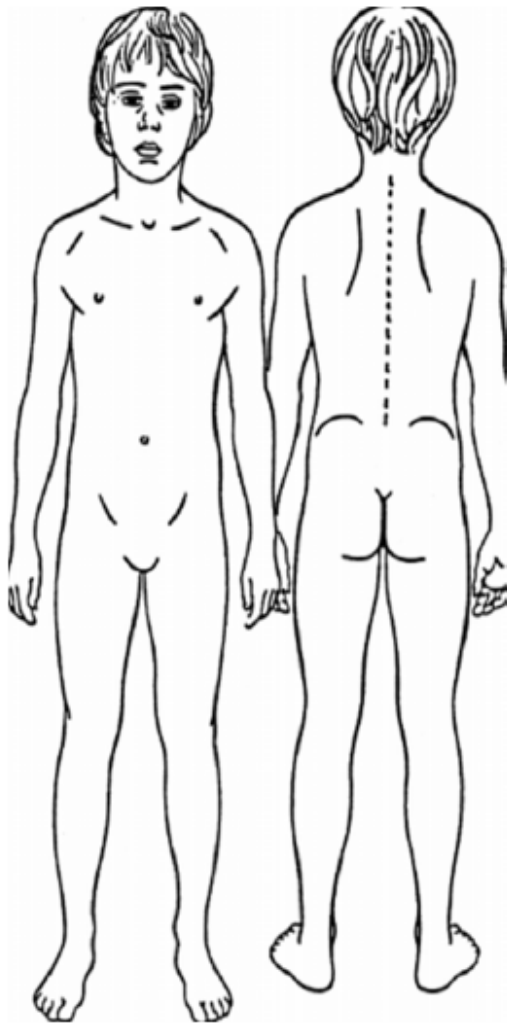
APPENDIX 3:**WSCB Welfare and Child Protection Concern form****NB.** This form is completed online only when a referral is made to the MASH**Child Welfare and Child Protection Concern Record**

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
This section is to be completed by the agency Safeguarding Lead									
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:								Date:	
<ul style="list-style-type: none"> • 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			
PLEASE NOTE: CHILDREN ARE NOT TO BE UNDRESSED OR PHOTOGRAPHS TAKEN OF ANY MARKS OR INJURIES			
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	

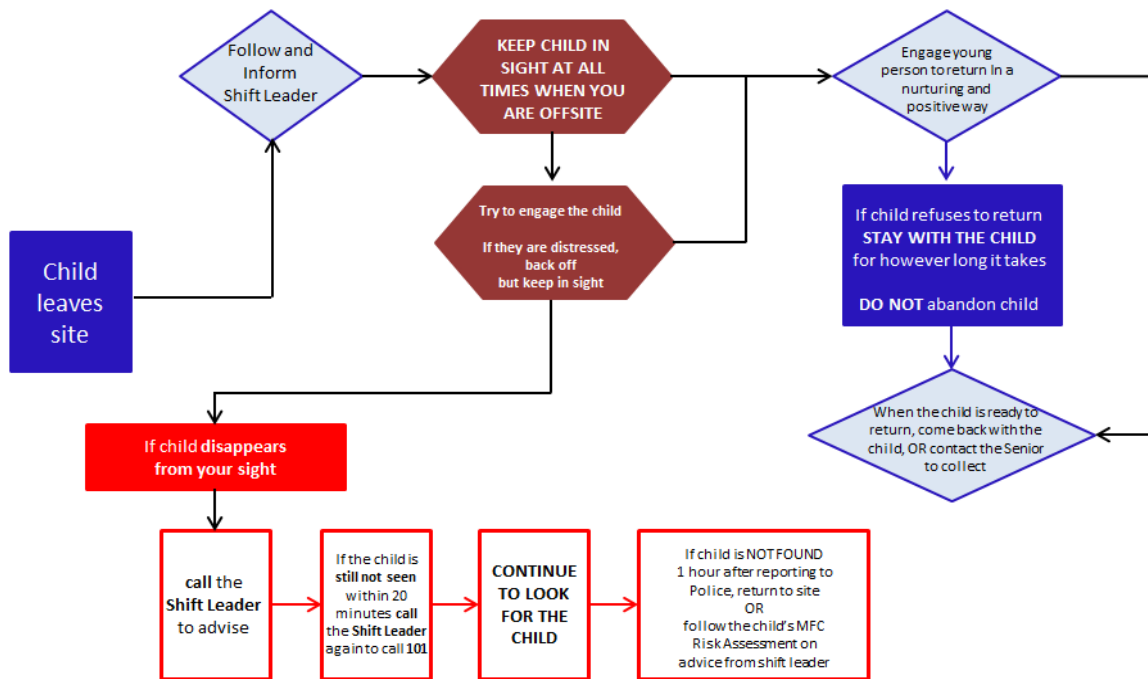


WSCB Welfare and CP Concern Record – September 2016

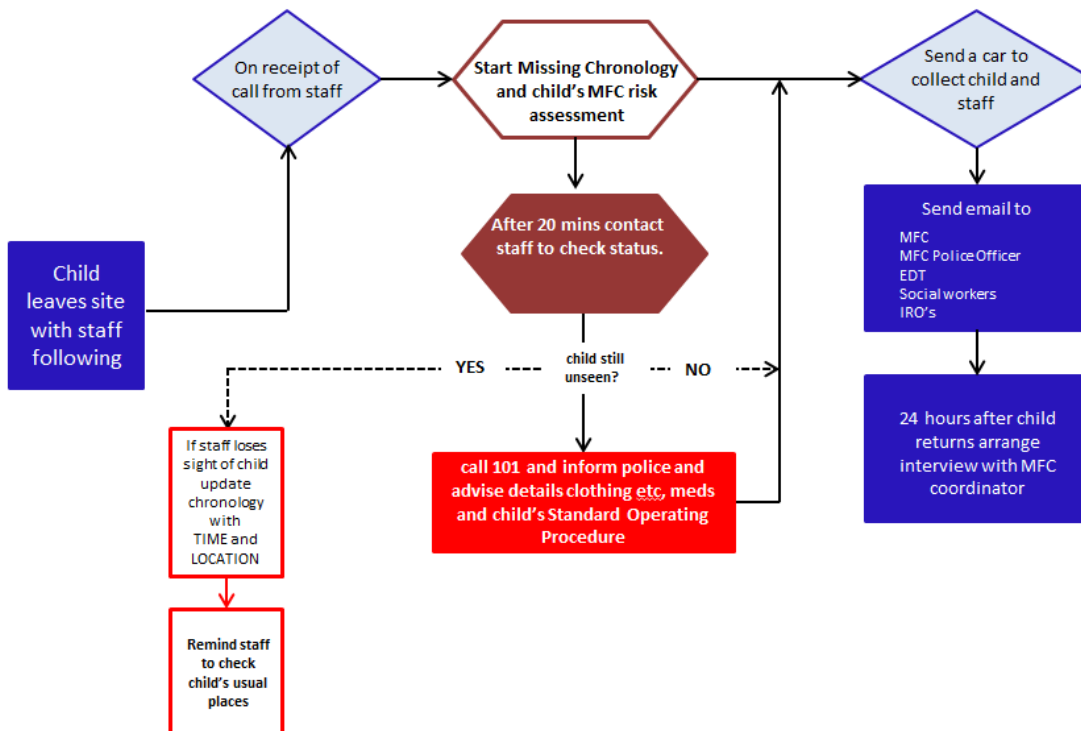
Review date: September 2017

APPENDIX 4:

Missing From Care - Guidance for Staff



Missing From Care – Guidance for Shift Leaders



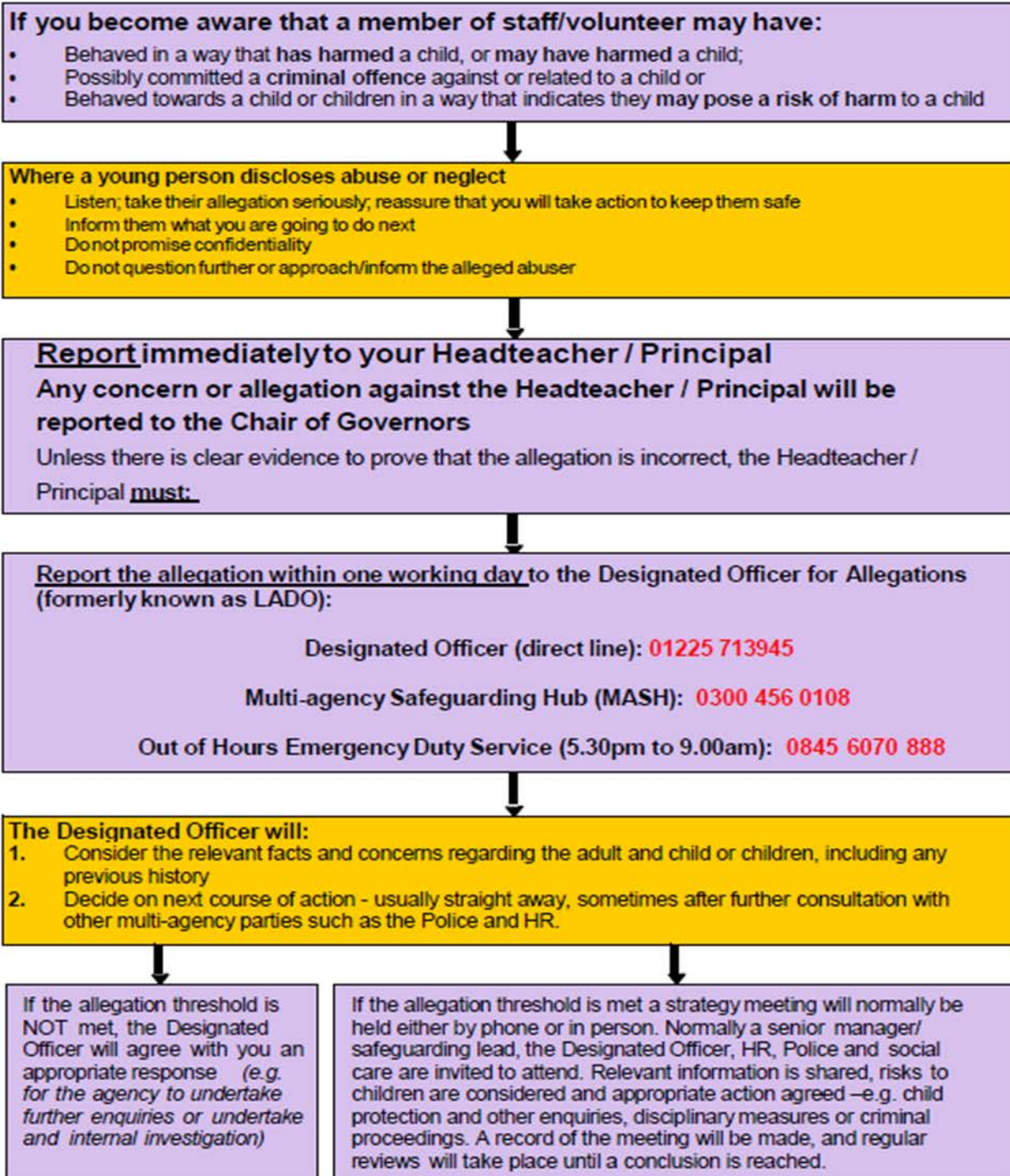
APPENDIX 5:

** 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