

SAFEGUARDING POLICY

Company Operations

ADO SERVICES C.I.C.

Incorporating River Valley AP

Version 4.5 ©2021

Current Version Valid from 1st February 2022

Next Scheduled Review February 2023

Reviewed by The ADO Management Committee

2021-2022

1. Safeguarding Overview

Our prime responsibility is the welfare and well-being of all children and young people (CYP) in our care. As such, we believe we have a duty to act quickly and responsibly to all safeguarding issues that may come to our attention.

Safeguarding and promoting the welfare of CYP with reference to this policy is defined as:

- Protecting children and young people from maltreatment
- Preventing the impairment of children, young people health or development
- Ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care.

This Safeguarding Policy pays due regard to national guidance issued by the Secretary of State, including '*Keeping Children Safe in Education*' (**September 2021**) [Keeping children safe in education 2021 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/98722/keeping-children-safe-in-education-2021.pdf)

And '*Working Together to Safeguard Children*' (**July 2018**) [Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/715446/working-together-to-safeguard-children-2018.pdf)

Although '*Every Child Matters*' (**2004**) has been superseded by more recent guidance including the above, these principles are at the forefront of ADOs ethos relating to safeguarding practices and procedures.

This policy is reviewed annually in line with our release management policy and was last reviewed by our Management Committee in February 2022 - with updates last incorporated by one of our Designated Safeguarding Leads (DSL) in February 2022 and re-released in February 2022 following internal review.

The Safeguarding Policy is valid for the following services:

ALL SERVICES

ADO supports all CYP within our care, protecting them from maltreatment and have robust procedures in place to prevent the impairment of their health or development

Our staff will work with parents, external agencies and the community to ensure the welfare and safety of CYP and to give them the very best protection in life. All have the right to be treated with respect and to be safe from any abuse in whatever form.

Hence, ADO Services has a clear commitment to protecting CYP and promoting their welfare. Should anyone believe that this policy is not being upheld, it is their duty to report the matter to the attention of the Senior DSL in the first instance and at the earliest opportunity.

For the **Safeguarding of Adults** at risk, please note there is a separate policy '**Safeguarding Policy for Adults**' within the ADO Library.

The ADO staff team are aware that a wide range of other policies are integral to the effective functioning of this policy. Therefore, this document should be read in conjunction with the other ADO Policies and Procedures and the overall collective General Terms, Information Packs, Welcome Packs and Guidelines from ADO as well as many of our policies and procedures listed within the reference section of this document.

All adults working with, or on behalf of ADO must always follow all of our procedures.

2. Key Contacts

Designated Senior Safeguarding Officer (DSL) (Director of Education – Managing Director): Victoria McHolland-Pilcher

Email: victoria@adoservices.co.uk

Tel: 020 8850 6778

Designated Deputy Senior Safeguarding Officer (DSL) (Head of AP & Therapy): Katie Palmer

Email: kate@adoservices.co.uk

Tel: 020 8850 6778

Safeguarding Officer for Poets Corner Site (DSO and Manager): Robert Jarvis

Email: robert@adoservices.co.uk

Tel: 020 8850 6778

The Current (2020-2021) Bexley LADO and Safer Organisations Advisor is:

Sharon Ackbersingh

Bexley Council

Civic Offices

2 Watling Street

Bexleyheath

Kent

DA67AT

**Tel: 020 3045 3436 or
020 3045 5645 (LADO Admin Team)**

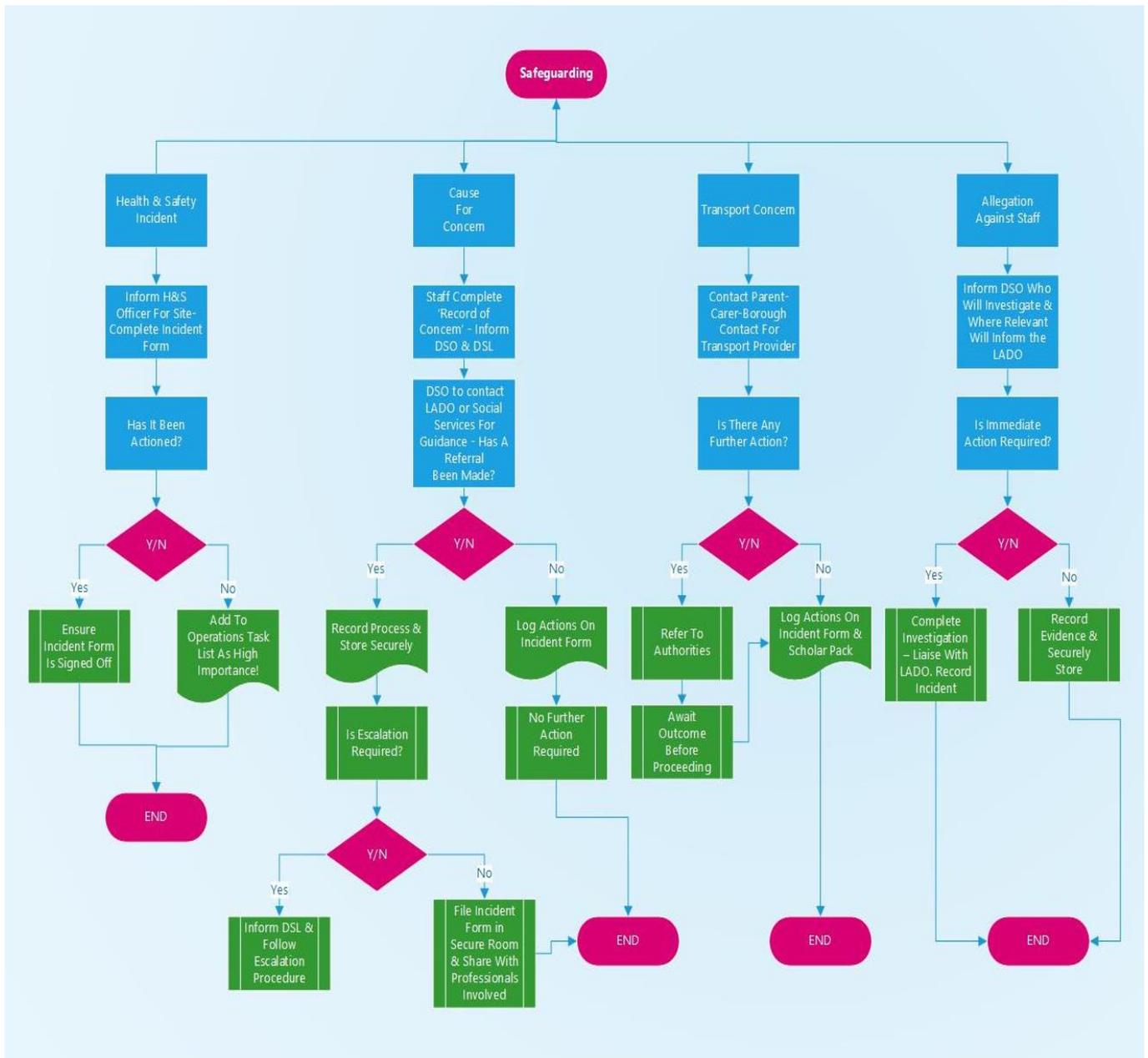
Tel: 02030455440 (via the Multi Agency Safeguarding Hub (MASH) administrative staff)

Authority Contacts

Alternatively, if you have any safeguarding concerns, you can phone

the **Golden Number 020 8303 7777** and ask for **Children’s Social Care**.

3. Safeguarding Workflow



4. Key Principles

To ensure safeguarding and promote welfare we will:

- Create an environment encouraging development and a positive self-image
- Encourage and develop a sense of independence and autonomy in a way that is appropriate to their age, stage of development and situation
- Provide a safe and secure environment for all
- Always listen
- Share feedback and information with other agencies as appropriate.

We are committed to safeguarding and promoting the welfare of all our service users and expect all staff to embrace this commitment. At the core of our work is the notion of 'thinking the unthinkable'.

All staff must be clear about their own role and that of others in providing a caring and safe environment for all service users and must know how they should respond to any concerns about an individual service user that may arise. To this end, ADO Services will ensure that all staff know that the ADO Education Director, is our DSL across all ADO services and has overall responsibility for child protection and safeguarding. Though some of the duties inherent to this role can and will be delegated to the deputy DSL (Head) in order that work is completed most efficiently, ultimate responsibility lies with the DSL. In the absence of the DSL, the deputy DSL will undertake DSL duties.

5. Training For Safeguarding Leads

The DSL and deputy DSL have received advanced level training to facilitate their roles as well as being safer recruitment trained. They receive updated training at least every two years and keep abreast of safeguarding developments at least annually.

6. Safeguarding Overview Directed At Staff, Visitors and Contractors

6.1 Safeguarding Mechanisms

A range of robust mechanisms assist our staff to understand and discharge their roles and responsibilities effectively so that professional implementation is ensured. These include:

- Safeguarding inductions
- Whole school annual safeguarding training
- Regular safeguarding and therapy refreshers and or quizzes

- Regular supervision meetings where opportunities are made available to discuss child protection training and any needs requiring further support
- Safeguarding emails to staff regarding key issues, updates and individual early help plans
- Termly link meetings between the Designated Safeguarding Lead (DSL) and Designated Safeguarding Officers (DSO)
- Internal and External Quality Assurance visits, whereby safeguarding scenarios are given to staff to assess their understanding of the processes and responsibilities they must follow in order to effectively safeguard our service users.

All staff must read and sign to acknowledge their understanding of '**Keeping Children Safe in Education**' (September 2021).

Drawing on the latest national and local guidance, full safeguarding training is provided to all staff annually. Regular safeguarding updates are provided throughout the year to ensure that staff have the most up to date relevant skills and knowledge to safeguard service users effectively.

Our training program focuses on topics such as the 'Prevent' duty, ACES & Toxic Stress, equality, online safety, child criminal exploitation and sexual violence and sexual harassment.

6.2 Staff Induction

Staff employed at ADO all receive safeguarding training at the very beginning of their induction period, and at least every year thereafter. They sign an induction form agreeing that they are aware of their roles and responsibilities, and have read and understood all relevant safeguarding guidance, policies and procedures and agree to implement them. This includes the staff handbook, safeguarding and curriculum policies.

All records of safeguarding are kept within our '**confidential**' section on **Scholarpack** (*will be moving to **Arbor** in Spring 2022*).

6.3 Register, Log and Report

The child protection register is maintained by the DSL and all staff working with service users are informed of all matters relating to service users in their care. In addition to our register, the DSL keeps a live safeguarding log (Incident Form), which records any and all concerns raised, and the actions taken, on an online system as notes.

The DSL provides a report on all safeguarding issues at each quarterly meeting of the Management Committee.

6.4 Safer Recruitment

We will always follow safer recruitment procedures so that we can be confident that all adults working across ADO Services are safe to do so. All Senior Management with responsibility for recruitment are Safer Recruitment trained.

Supervision is provided for staff involved in managing child abuse allegations by the ADO Senior Therapist.

In line with the 'KCSIE 2021' Guidance, we aim to verify a candidate's identity by checking the name on their birth certificate. It is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Further identification checking guidelines can be found on the [How to prove and verify someone's identity - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/how-to-prove-and-verify-someone-s-identity) website.

ADO also ensure 'Right To Work' checks are completed for those living and working outside the UK. This also covers the requirement that DBS checks are UK only.

6.5 Enhanced Disclosure Checks

All ADO staff, those consultants providing ADO with Professional Services, Visitors, Contractors and Volunteers have to be in possession of a valid enhanced DBS certificate prior to their appointment. Furthermore, volunteers will always be working within a supervised capacity and never left on their own. In extreme circumstances, an individual may commence work with a DBS check that is pending as long as ADO has received two satisfactory references and a cleared barred list check. Furthermore, the individual would always be supervised when working with service users.

When informed in advance by a staff member undergoing a DBS check, the DSL will risk assess the member of staff in question if the check includes a record of anything that could potentially be cause for concern - including any police caution, conviction, reprimand or warning.

Whether this risk assessment supports the appointment of the staff member or not, this risk assessment, along with any supporting investigative documentation, will be kept securely and confidentially on file.

If a member of staff does not declare anything that could potentially be cause for concern, including any relevant police caution, conviction, reprimand or warning, the applicant will not be appointed.

6.6 Visitors and Contractors

Procedures are in place for recording the details of visitors to the company buildings and sites and we take security steps to ensure that we have control over who comes into the buildings and sites to work, so that no unauthorised person has unsupervised access to the CYP.

All visitors or contractors must be expected and will not be allowed access unless they have been previously booked in for a meeting or activity prior to their visit. Any visitors or contractors attending un-announced at any of our locations will be advised to call the main office and go through the procedure for booking a meeting or activity.

Those visitors or contractors cleared and expected to attend will sign into the visitor records book and wait for an ADO staff member.

All visitors and contractors must release their mobile phone or smart device which will be safely locked in a secure box and withheld until they leave the location.

All visitors or contractors that are required to work in areas where safeguarding measures are active, must have prior to their visit provided proof they have been DBS checked. All visitors or contractors will still be supervised during their stay, especially when in designated safeguarding areas and times.

7 Responding To Concerns About Individual Service Users.

All service users deserve the opportunity to achieve their full potential. The purpose of intervention is to safeguard and promote their welfare. Consequently, for those ADO staff who engage with service users, who experience discrimination in their daily lives or who are from cultures different to those of the professionals, assumption and stereotyping must not be part of our practice. Every effort must be made to ensure that cultural issues are understood and that each individual case is dealt with on its own merits. Teachers and those working across ADO services have daily contact with service users in classes and around the school premises. As a result, their first-hand knowledge of child development and behavioural norms places them in a unique position to identify those service users who would benefit from 'early help' and or who are at risk of abuse.

All service users within the ADO community must be able to place their trust and confidence in any adult working amongst them. They must feel sure that they can speak about any worries or concerns they may have. It is vital that they believe they will be listened to, taken seriously and responded to appropriately.

ADO Staff have a duty to protect and promote the welfare of our customers and visitors. Due to the many hours of care we are providing, staff will often be the first people to sense that there is a problem. They may well be the first people in whom children confide about abuse for example. Consequently, staff must know what to do if a service user chooses to talk to them about anything which raises child protection concerns.

All staff must:

- Listen to what the service user is saying without interruption and without asking leading questions
- Respect the service user's right to privacy but not promise confidentiality
- Reassure the service user that they have done the right thing in sharing
- Explain to the service user that in order to keep them safe from harm the information that has been shared must be passed on
- Report what has been disclosed to the DSL as soon as possible, or in their absence, the deputy DSL
- Record, as soon as is practicable, but on the same day, what was said using the service user's actual words on the ADO 'Record of Concern' document.

If there is a risk of immediate serious harm to a service user a referral can and should be made to children's social care or authorities immediately and that anybody can make a referral.

If the service user's situation does not appear to be improving the staff member with concerns should urge re-consideration.

The DSL will:

- Assess any urgent medical needs of the service user
- Consider whether the service user has suffered, or is likely to suffer significant harm
- Check whether the service user is currently subject to a Child Protection Plan or has been previously subject to a plan
- Confirm whether any previous concerns have been raised by staff
- Only inform the family of the service user of any concerns once the duty team leader at social care services has been consulted and their advice sought
- Consider whether the matter should be discussed with the service user's family or whether to do so may put the service user at further risk of harm because of delay or the family's possible actions or reactions
- Seek advice if unsure that a service user's protection referral should be made.

If the service user discloses sexual abuse or child criminal exploitation (CCE), or these factors are suspected, they must not be questioned, and the parent-carers must not be informed until social care services and the police child abuse investigation team has been informed and advice given.

However, educators, therapists and support workers do not decide if something is or is not a child protection issue. Any concerns must be passed onto the DSL and or deputy DSL and referred if necessary, to the authorities for guidance.

ADO Staff must always follow our safeguarding and child protection procedure if they have any concern about a service user.

Information will be shared on a 'need to know' basis and must be treated in absolute confidence. Staff must not discuss allegations with the service user, family members or colleagues.

The DSL will either make a referral to the child's local authority children's services duty or referral and assessment team or, if a referral is not considered appropriate at that stage, make full written records of the information that they have received, detailing the reasons for the judgement that the matter was not referred to the local authority. The DSL keeps a written record of all contact with other agencies. All paperwork relating to child protection is kept securely.

All service users who are subject to a child protection plan will have core group meetings and case conferences organised by social care services. A member of the safeguarding leadership team (DSL or deputy DSL) will attend these on behalf of ADO. Service users are aware that these meetings take place and that ADO will be presenting a report at the meetings

All staff, including leaders, educators and therapists monitor service users who are subject to a social care services Child Protection (CP) or 'Child In Need' (CIN) Plan. Staff also ensure that they monitor service users who may have 'Low/ Emerging/ and Complexed' level needs.

8 Child Protection – Recognition and Response To Abuse

Owing to the nature of the day-to-day relationship service users at ADO Services have with staff, all adults working in ADO are well-placed to spot any physical, emotional or behavioural signs that service users may be suffering significant harm. We understand that harm means: the ill-treatment or impairment of a service user's health and or development, including that caused as a result of witnessing the ill- treatment of another person.

This is also a type of physical abuse. This is where a CYP is presented with an illness that is fabricated by the adult carer. The carer may seek out unnecessary medical treatment or

investigation. The signs may include a carer exaggerating a real illness or symptoms, complete fabrication of symptoms or inducing physical illness e.g. through poisoning, starvation, inappropriate diet. This may also be presented through false allegations of abuse or encouraging the CYP to appear disabled or ill to obtain unnecessary treatment or specialist support.

Therefore, all staff must be alert to any possible indicators that a service user is suffering harm and report any concerns to the DSL. The resources within this policy to guide all staff are available to view in the appendix sections starting on page 32. The outline appendix guidance includes the following sections for reference purposes:

GENERAL ADVICE & GUIDANCE FOR STAFF - APPENDIX 1

CATEGORIES, DEFINITIONS & SIGNS TO LOOK OUT FOR OF CHILD ABUSE - APPENDIX 2

AN EXAMPLE OF VISITOR SAFEGUARDING INFORMATION - APPENDIX 3.

BITING POLICY – APPENDIX 4

AN EXAMPLE OF SAFEGUARDING KEY CONTACT INFORMATION - APPENDIX 5.

9. Safeguarding - Providing A Safe Environment

All families of service users attending ADO Services must feel secure in the knowledge that they are entrusting their children to adults who will strive to keep them safe across all services.

We will do this by:

- Promoting a caring, safe and positive environment within all ADO services
- Ensuring that our staff are appropriately trained in safeguarding and child protection according to their role and responsibilities and keep an up-to-date record of all training undertaken
- Encouraging the self-esteem and self-assertiveness of all service users through the curriculum so that they themselves become aware of danger and risk and what is acceptable behaviour and what is not
- Working in partnership with all other services and agencies involved in the safeguarding of service users
- Displaying appropriate posters that detail contact numbers for child protection helplines (ChildLine)
- Always following Safer Recruitment procedures when appointing staff
- Welcoming visitors in a safe and secure manner (all visitors must sign in, read key safeguarding information and have mobile devices locked away)
- Undertaking risk assessments when planning out-of-school activities or trips

- Parents and carers are also able to make direct referrals to the local authority children's services if they have a concern about a service user by using the telephone numbers in **Section 2** of this document.

9.1 Secure Areas

In the event of a security alert, designated secure areas may be used to protect our service users and staff. The security alert may be triggered, but not limited to the following reasons:

- A service user may be acting violently or aggressively towards other service users or staff in a state of crisis.
- An unauthorised member of the public may have breached security and entered the site unannounced. We call this an intrusion event and key word codes will be shared across staff using our communication walkie-talkies to alert them of potential danger and to retreat to the secure area.
- An animal may have escaped in distress and is exhibiting erratic dangerous behaviour.

As an outdoor setting without lockable buildings, we currently utilise our large animal enclosure space (80sq.m) to safeguard service users and staff. This space is the secure area most used as it can protect from any other service users in distress or crisis, unauthorised intrusions and escaped animals. The enclosure has a bolted door which can be locked from the inside, protecting those inside the enclosure from harm.

Service users who see their peers who are emotionally dysregulated can be distressed on occasions, so having a wide variety of animals to interact with whilst being kept safe in a secure area can help them to feel more comfortable. Therefore, the area offers both protection and a therapeutic approach in times of distress.

10 Safeguarding in Specific Circumstances

10.1 Safeguarding With SEN and Disabilities

All service users deserve the opportunity and have the right to achieve their full potential. The purpose of intervention is to safeguard and promote the welfare of service users. We are aware that some of our service users, whom have special educational needs and or disabilities are more vulnerable to be subject to abuse and neglect. For instance, there could be a reluctance to believe that service users with SEN and or disability are being abused. Additionally, limited opportunities for such service users to seek help from someone else may co-exist with a lack of access to support services.

Staff are aware that behaviour, mood and or injury may indicate possible abuse and not just their SEN or disability. Our service users may have a higher risk of being isolated from their peers, left out of group activities or bullied. ADO services strive to help safeguard their service users by providing them with:

- Plentiful opportunities to be heard and listened to
- Excellent access to therapeutic support
- Excellent liaison with external support services on the family's behalf

10.2 Contextualising Safeguarding

Staff are aware that safeguarding incidents and or behaviours may be a result of factors outside of services. All staff, in particular the DSL and deputy DSL consider the context within which such incidents and or behaviours occur and establish whether these wider environmental factors are putting service users at risk of harm.

10.3 Attendance And CYP Missing Education (CME)

All CYP who attend ADO are recorded daily on a register and a record is kept of their absence and reasons for the absence from attending on any day.

We know that a service user's unexplained absence from an ADO service could mean that they are at risk of harm and that "a CYP going missing from education" is a potential indicator of abuse or neglect.

In addition to our clear attendance policy:

- Our classes are small, and thus attendance is easy to track closely
- Any service user going missing from education will always get immediate attention from the Office Manager and DSOs.
- Staff are trained to be alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage
- We will always seek to clarify the reason for a service user's absence from school with their Parent-Carer, school or borough as soon as is practicable on the first day; the reason for absence will be recorded on the register.
- If we are unable to obtain the reason for an absence, we will escalate to the respective heads of the organisation whom have agreed to their Service Level Agreements.
- We will always report an unexplained absence of a service user with a Child Protection Plan to the CYP's social worker on the same day
- We will always report to the local authority the name of any service user who has been newly registered to attend any of our services but does not arrive on the expected day
- We maintain accurate attendance and admission registers (all service users are on both) in line with statutory requirements
- We actively push Local Authorities and other professionals for 'Destination Data' when a child leaves ADO

We do not 'delete' service users from the admission register.

Keeping local authorities up to date is crucial so that they can check if service users of compulsory school age are missing education, and therefore might be in danger of not receiving an education and be at risk of abuse or neglect.

On the rare occasions that we provide service users time out from the service for a fixed-term (usually a day), we put this in writing to both the family and the placing local authority. We cannot be responsible for their safety and welfare during their time at home.

11. Safeguarding Criteria

To fully understand the complete range of instances in Safeguarding, it is important to recognise examples of these, their parameters, criteria and actions required to address them.

11.1 Extremism And Radicalisation

Since 2010, when the Government published the 'Prevent Strategy' (the key prevention aspect of Contest), there has been an awareness of the specific need to safeguard children, young people and families from extremism. There have been several occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

ADO Services values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Both Students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to the rule of law and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make CYP vulnerable to future manipulation and exploitation. ADO services is clear that exploitation and radicalisation is viewed as a safeguarding concern and must be dealt with accordingly.

ALL staff at ADO services must complete 'Prevent' and Channel training as part of their induction and will receive regular briefings and update training.

11.2 Forced Marriage And Honour Based Violence

A 'forced' marriage is distinct from a consensual 'arranged' marriage because it is without the valid consent of both parties and where duress is a factor. A CYP who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Information about a forced marriage may come from the CYP themselves, of their peer group, a relative or member of the CYP's local community or from another professional.

Forced marriage may also become apparent when other family issues are addressed, e.g. domestic violence, self-harm, child abuse or neglect. Forced marriage may involve the child being taken out of the country for the ceremony, is likely to involve non-consensual/under-age sex and refusal to go through with a forced marriage has sometimes been linked to 'honour killing'. Honour-based violence is an ancient cultural tradition that encourages violence towards family members who are considered to have 'dishonoured' their family. It is rooted in domestic violence and is often a conspiracy of family members and associates, meaning victims are a risk for their parents and families.

ADO staff should respond to suspicions of a forced marriage or honour-based violence by alerting the DSL who will make a referral to Children's Social Care and if the risk is acute, to the Police Child Abuse Investigation Team.

ADO staff should not treat any allegations of forced marriage or honour-based violence as a domestic issue and send the service user back to the family home. It is not unusual for families to deny that forced marriage is intended, and once aware of professional concern, they may move their CYP and bring forward both travel arrangements and the marriage. For this reason, staff should not approach the family or family friends, or attempt to mediate between the CYP and family, as this will alert them to agency involvement.

Further information and advice can be obtained from the Forced Marriage Unit www.fco.gov.uk/forcedmarriage or 020 7008 0151 and the Honour Based Violence Helpline 0800 599 9247.

11.3 Female Genital Mutilation

FGM (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. FGM affects girls particularly from North African countries, including Egypt, Sudan, Somalia and Sierra Leone.

Staff should be alert to the Following Indicators:

- The family comes from a community that is known to practise FGM
- A service user may talk about a long holiday to a country where the practice is prevalent
- A service user may confide that she is to have a 'special procedure' or to attend a special occasion

- A service user may request help from a teacher or another adult
- Any female service user born to a woman or has a sister who has been subjected to FGM must be considered to be at risk, as must other female children in the extended family

It is illegal in the UK to allow girls to undergo FGM either in this country or abroad. It is important to note that all staff have a duty to report personally any concerns they may have about girls at risk of FGM to the police. Any concerns must be immediately shared with the DSL and teachers are aware that they have a mandatory duty to report known cases of FGM.

11.4 Bullying

We understand that bullying, including cyber-bullying, is harmful to children. Our **Prevention of Bullying Policy** linked very closely with our **Behavioural Modification Policy** sets out our aim of ensuring no service user becomes a victim of any form of bullying. ADO services foster an environment where bullying behaviour is known to be unacceptable and we will always take seriously any reports of bullying and respond appropriately.

We understand that bullying may take different forms and may include, as examples, racist, sexist, homophobic, transphobic and biphobic behaviours.

All staff are clear about the Protected Characteristics, as prescribed in the Equality Act 2010

Any such reported or observed incident will be dealt with in accordance with our **Prevention of Bullying Policy**.

11.5 Online Safety

We recognise that service users' use of the internet is an important part of their education but that there are risks of harm associated with its use. We have an **Online Safety Policy** that addresses how we seek to minimise those risks across our services and teach all service users how to stay safe when using the internet in their lives outside of the ADO community. We also recognise that all members of staff must always be mindful of the need to follow our policy of acceptable use of our IT equipment.

New technologies have become integral to the lives of children and young people in today's society, both within schools and in their lives outside of school. The requirement to ensure that children and young people are able to use the internet and related communications technologies appropriately and safely is addressed as part of our wider duty of care to which all who work in schools are bound. The use of these exciting and innovative tools in school and at home has been shown to raise educational standards and promote achievement.

Unfortunately, the use of these new technologies can put children and young people at risk within and outside the school. Hence, service users are not allowed to have any mobile device on them during the school day, except older AP students, who may have use for good behaviour in a controlled environment during breaks or lunch, which helps to safeguard them and ensure they are not accessing any inappropriate material on personal devices.

While filters should not over block, as it may place unreasonable restrictions on what can be taught, it is also fundamental to be aware of some of the potential dangers that the internet can pose, including:

- Access to illegal, harmful or inappropriate images, video games or other content
- Unauthorised access to loss of or sharing of personal information
- The risk of being subject to grooming
- The sharing or distribution of personal images without an individual's consent or knowledge
- Inappropriate communication/contact with others, including strangers
- Sexting
- Implications of geolocation
- Cyber-bullying
- An inability to evaluate the quality, accuracy and relevance of information on the internet
- The potential for excessive use which may have a negative impact on the social and emotional development and learning of the young person.
- Material published by service users and staff in a social context which is considered to bring ADO services' reputation into disrepute (or considered harmful to, or harassment of, another service user or member of the organization) will be considered a safeguarding issue and a breach of conduct.

11.6 Sexting

The UK Council for Child Internet Safety (UKCCIS) have produced updated guidance for schools on how to tackle sexting and 'youth produced sexual imagery' as sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives. *(See new guidance from UKCIS on the sharing of nude and semi-nude images which has replaced historic sexting advice **Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)**)*

This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to child sexual exploitation (CSE).

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales)

<https://www.legislation.gov.uk/ukpga/1978/37>.

Specifically, it is an offence to possess, distribute, show and make indecent images of children. The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

Although the production of such imagery will likely take place outside of the context of ADO services, these issues often manifest in schools working with children and young people. Staff respond swiftly and confidently to ensure that service users are safeguarded, supported and educated.

The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of the young people involved.

- All incidents involving sexting and youth produced sexual imagery should be reported immediately on an Incident Form and escalated.
- The DSL should hold an initial review meeting with appropriate ADO staff
- There should be subsequent interviews with the service users involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the service user at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

11.7 Child Sexual Exploitation

Sexual exploitation can take many forms from the seemingly 'consensual' relationship where sex is exchanged for attention/affection, accommodation or gifts, to serious organised crime and child trafficking.

What marks out exploitation is an imbalance of power within the relationship. The perpetrator always holds some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops. ADO attempts to identify service users who are vulnerable to, or at risk of, sexual exploitation and who need services and

interventions to keep them safe. We will pass on any information about CSE issues affecting ADO services, such as concerns about adults hanging around the school, to the police.

11.8 Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It may occur through a single child or group of children sexually harassing or being sexually violent towards another child or group of children, it may happen both physically or verbally, online or offline. Evidence suggests that girls, children with Special Education Needs and Disability (SEND) and LGBT children are at greater risk (as with Child Criminal Exploitation *KCSIE 2021*). It is important that all disclosures are taken seriously, victims are supported and there is a clear message that it is never acceptable.

Any experience of sexual violence and sexual harassment is likely to have a significant impact on a service user's emotional well-being and adversely affect their educational attainment.

ADO Staff are to report any concerns about a service user to the designated safeguarding lead and log it with an Incident Form.

11.9 Allegations From Service Users Against Other Service Users

In most instances, negative conduct of service users towards each other will be covered by our policies for Promoting Positive Behaviour and Preventing Bullying. However, some allegations and peer on peer abuse may be of a more serious nature and raise safeguarding concerns. Allegations made against another service user may include physical abuse (e.g. violence, particularly pre-planned; forcing the use of drugs or alcohol), emotional abuse (e.g. bullying, blackmail, extortion, threats, intimidation), sexual abuse (e.g. indecent exposure, touching, sexual violence and sexual harassment, sexting, forcing the watching of pornography) and/or sexual exploitation (e.g. photographing or videoing indecent acts).

11.10 Gangs

In our schools' localities of South East London, gangs are prevalent, and our service users are vulnerable to gang membership or re-membership. Older service users may also attempt to recruit younger service users using any or all of the above methods. It is also well documented that CYP suffering from gang crime and sexual exploitation themselves may be forced to recruit other peers, under threat of violence.

11.11 Looked After Children And Young People

Occasionally an ADO service user will be in 'Looked After' accommodation and will be living independently from their original family or carer home. These CYP are particularly vulnerable to any of the criteria listed in this document and ADO staff should be aware of

their circumstances accordingly. Close communication should always be made with the residential care home they are living if any safeguarding concerns are flagged.

11.12 Drugs And Substance Abuse

Service users are at risk from a range of both legal and illegal substances. Substance misuse is an increasing social problem that can have devastating consequences for individuals, their families and the community as a whole. ADO is committed to the health, safety and welfare of its service users and will take action to help safeguard their well-being as well as providing support, advice and education about drugs and substance misuse as appropriate. ADO will never condone the misuse of substances, and the possession or supply of illegal drugs, and it will be viewed as a safeguarding concern.

12 Minimising The Risk

It is inevitable in our services that some Students or service users will present a safeguarding risk to other Students or service users. A robust induction system ensures that we are informed as to whether a service user arrives or re-joins presenting a safeguarding concern, for example after coming back into school following a period in custody or having experienced serious abuse themselves. Intelligent timetabling, groupings, supervision and personalised risk assessments, including daily dynamic risk assessments, are central to the effective management of safety in our services. In itself, this dramatically reduces the possibility of negative conduct against other service users, and therefore of allegations.

13 Managing Allegations Against Other Service Users

All staff treat this abuse very seriously and never consider it as 'banter' or part of growing up. When an allegation is made by a service user against another service user, staff should consider whether the complaint raises a safeguarding concern.

If there is a safeguarding concern:

- The DSL should be informed as per the usual procedures
- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances
- The DSL will contact social care services to discuss the case. It is possible that social care services are already aware of safeguarding concerns around the service user in question. The DSL will follow through the outcomes of the discussion and make a social care services referral where appropriate
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in both service users' files

- If the allegation indicates a potential criminal offence has taken place, the police will be contacted at the earliest opportunity and parents informed (of both the service user being complained about and the alleged victim)
- It may be appropriate to exclude the service user being complained about for a period of time, as outlined in our Promoting Positive Behaviour and Preventing Bullying policies
- Where neither social care services nor the police accept the complaint, a thorough ADO investigation will take place in any case, using our internal procedures
- In situations where the DSL considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan which will be monitored and evaluated with all adults working with the service user. Individual risk assessments will also be amended accordingly.
- Both the victim(s) and perpetrator(s) will be supported by the school, what this looks like may vary depending on the case, however it may include: additional therapeutic support, home visits, personalised timetable, family support and ongoing communication with external agencies.

14 Child Criminal Exploitation (Including 'County Lines')

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a CYP into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect CYP, both male and female and can include individuals who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Some specific forms of CCE can include CYP being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

CYP can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As CYP involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal

exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

The criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity; drug networks or gangs groom and exploit children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Staff are aware that a key indicator to look out for is missing episodes; if a service user has periods of going missing it is possible that they have been trafficked for the purpose of transporting drugs. This is another reason why our absence procedure is so crucial; we inform the police if we have been unable to obtain a reason for a service user's absence as they are classed as a 'missing child'.

Like other forms of abuse and exploitation, child criminal exploitation can affect any CYP under the age of 18. It can still be exploitation even if the activity appears consensual; there is usually some form of power imbalance in favour of those perpetrating the exploitation. It can also involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. Staff should raise the concern with the DSL as soon as possible and log any information relating to child criminal exploitation on an Incident Form.

15 CYP and The Court System

CYP are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There is guidance available on the government website that explains the process and support that are available for CYP.

Making arrangements via the family courts following a relationship breakdown can be an extremely stressful time for the whole family. The Ministry of Justice has launched an online CYP arrangements information tool which parent-carers may find helpful as it offers clear information in the dispute resolution service. Further information on the court system can be found at: <https://helpwithchildarrangements.service.justice.gov.uk/>

16 CYP Employment

Only children over the age of 13 may be employed to do light work. Regulations determine the type of work and restrict the hours a CYP may be employed for. CYP working in the UK who are still of compulsory school age are required to have a work permit if required by local bylaws. Different regulations apply to CYP in entertainment, where individuals under thirteen may be licensed to perform in commercial performances under strict guidelines and controls. Further information on children in employment can be found at <https://www.gov.uk/child-employment>

17 Private Fostering

A private fostering arrangement is one that is made privately, without the involvement of a Local Authority, for the care of a CYP under the age of 16 years of age by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

Each party involved in the private fostering arrangement has a duty to refer it to the Local Authority at least six weeks before the arrangement is due to begin, and not to do so would be an offence. ADO has a duty to inform social care services if we become aware of a private fostering arrangement that has not been shared with the Local Authority. Although there is no duty for ADO to be informed of private fostering arrangements it would be helpful if the family could pass on the information to ensure support can be put in place. Further information on private fostering can be found at <https://www.privatefostering.org.uk>

18 Health And Safety

Our Risk Assessment and Health & Safety policies demonstrate the consideration we give to minimising any risk to service users when on ADO premises and when undertaking activities out of ADO under the supervision of our staff. This also includes alternate provisions, where we are responsible for the safeguarding of service users. Risk assessments, site visits and a written statement is obtained from the provider stating that they have completed all the required vetting and barring checks that are necessary on their staff.

We acknowledge our responsibility to safeguard all service users in potentially vulnerable situations such as changing rooms, while also acknowledging their right to privacy. A professional judgement is made based on the age and the developmental needs of service users; appropriate supervision is achieved by staff being in close proximity to the changing room and service users should be aware of this, knowing that adults will enter the room only if necessary.

Onsite showers are available for service users to make use of if required. Service users may be encouraged to do so in order to improve their personal hygiene and/or to reinforce the importance of cleanliness and regular washing. Risk assessments are in place to ensure the safety of both service users and staff members.

To ensure the safety of our service users, procedures in place allow staff to search them, if there is reason to believe, to make sure that they are not bringing inappropriate materials or dangerous weapons into ADO sites. There will normally be two members of staff present during a search, and a member of staff who is of the same sex as the service user will carry out the search. In exceptional circumstances, if there is a risk of serious harm to a person if the search is not carried out immediately, service users may be searched by a person of the opposite sex and without another member of staff present.

19 Working With Service User' Families

19.1 Service Users' Information

We acknowledge the importance of maintaining up-to-date and accurate information about service users. To this end, we regularly ask all families to provide us with the following information and to notify us of any changes that occur:

- Names and contact details of persons with whom the service user normally lives
- Names and contact details of all persons with parental responsibility
- Emergency contact details
- Details of any persons authorised to collect the service user from school (if different from above)
- Any relevant court orders in place including those which affect any person's access to the service user (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- Name and contact detail of the service user's general practitioner
- Any other factors which may impact on the safety and welfare of the service user

19.2 Confidentiality

Information about service users given to us by themselves, their parents or carers, or by other agencies will remain confidential. Staff will be given relevant information only on a 'need to know' basis in order to support the service user - if that is necessary and make use of if required.

We are, however, under a duty to share any information which is of a child protection nature. We understand that this is in the best interests of the service user and overrides any other duties we have regarding confidentiality and information sharing. We have a duty to keep any records which relate to child protection work undertaken by us or our partner agencies and to ensure that these are kept apart from the main service user record, stored securely and only accessible to key members of staff. We also have a duty to send copies of these records to any school to which the service user transfers.

19.3 Referrals To Other Agencies or Authorities

If we have a reason to be concerned about the welfare of a service user we will always seek to discuss this with their family in the first instance. On occasion, according to the nature of our concern, it may be necessary for us to make an immediate referral to social care services when to do otherwise may put the service user at risk of further harm either because of delay, or because of the actions of the parents or carers.

20 Adults Working With CYP

20.1 Safer Recruitment

We do not facilitate work placements, work experience or deploy any form of temporary worker in our key safeguarding areas.

20.2 Preparation

We will always consider the vacancy that has arisen within the context of safeguarding our service users and ensure that we include the responsibility to safeguard them within the requirements of the role. We always consider carefully the knowledge, skills and experience required to safeguard children and include these within a person specification.

20.3 Advertising

All vacancies that are open to external applicants are advertised on our website. When using the services of a third-party advertising site or agency, we endeavour to advertise our vacancies in a manner that is likely to attract a wide range of applicants (e.g. on a nationally recognised website, such as Indeed or TES Jobs). The advertisement will always include a statement about our commitment to safeguarding children and our expectation that all applicants will share that commitment. The advertisement will state that the post is subject to all relevant statutory vetting checks.

20.4 Applications

Through whichever route an employee joins us, they must complete an application form. Our application form enables us to gather information about a candidate's suitability to work with CYP by asking specific and direct questions. We scrutinise all completed application forms and do not accept CVs alone. The candidates indicate that they understand that they will be subject to vetting checks, including a barred list check, an enhanced DBS check, the prohibition from teaching check and, if appropriate, the s128 prohibition from management check.

The recruitment process for leadership roles follows the typical structure; once a pre-determined closing date has passed, leaders shortlist candidates on the basis of the application forms submitted and invite successful applicants to attend interviews. Non-leadership vacancies, however, are far more frequent and usually recruited for within a shorter time-frame. Consequently, it is not practical to adhere to the same recruitment protocol. For teaching, support and administration roles, therefore, candidates are invited to an initial meeting with the relevant leader on the strength of their CV, as and when we receive them. After a successful initial meeting, a candidate will be invited to complete an application form before attending a trial day, followed by a formal interview.

20.5 Formal Interviews

- We will always conduct a face-to-face interview
- Our interview panel will always contain at least two leaders and all interviewers are safer-recruitment trained
- Interview questions will seek to ensure that we understand the candidate's values and beliefs that relate to children and young people
- All candidates will be asked to bring original documents, which confirm their identity, qualifications, right to work in the UK and any overseas checks
- An interview pack which consists of a set of general interview questions (including on safeguarding), interviewers' grades and the decision to appoint or not to appoint, is kept in the employee's file

20.6 Selection

The interview panel will consider all the evidence gathered before making its choice, whereupon a verbal offer of the post will be made to the successful candidate. On acceptance of the post, candidates are given a formal offer letter which states that their appointment is subject to the school's receipt of two satisfactory professional references, the completion and return of all relevant paperwork and successful completion of all the relevant statutory vetting checks. Unsuccessful candidates are informed of the outcome of their application and feedback is available upon request.

20.7 References

We do not accept open references, letters of recommendation or testimonials

We always take up at least two references; these must be completed on our own reference form and signed off by the Quality Assurance Manager before employment commences

Our reference form includes questions specifically intended to reveal safeguarding concerns, such as enquiring about the candidate's previous competency when working with CYP, asking if the candidate was ever subject to disciplinary action and if the referee knows of any reason why the candidate should not be given substantial access to CYP.

Verification checks are performed at random on at least 1 in every 4 references we receive. This includes confirming the identity of the referee, by phone, as well as the validity of the reference they have submitted. These checks are also carried out in every instance in which the referee is deemed to have given insufficient, ambiguous or concerning information. Similarly, verification checks are performed whenever a reference is returned from an email address that is not recognisably professional or that does not obviously belong to the person from whom we are expecting to receive the reference.

We verify previous employment history, where necessary.

20.8 Vetting Checks On Our Single Central Record

We arrange for a DBS check to be processed for all new staff, unless they are able to evidence an original DBS certificate that is subscribed to the DBS update service and which we can confirm remains current and accurate. All staff for whom we arrange to have a DBS check processed are required to subscribe to the DBS update service. We gain consent from all staff to re-check the status of their DBS at any time, typically at least every three years.

In addition:

All staff working in regulated activity require an Enhanced DBS check.

- Staff are always supervised while the DBS check is being processed (if relevant), and a DBS barred list check is always undertaken before staff commence their duties with ADO services.
- All members of our Management Committee are Enhanced DBS checked.
- If a candidate declares at the interview stage that their DBS certificate will or might not be clear (particularly if it includes or might include a police caution, conviction, reprimand or warning), the DSL and the DSD will assess whether or not the disclosure should preclude the candidate from working with ADO services. If the candidate's application is allowed to proceed, the DSL will complete a risk assessment for the individual, which will be kept securely and confidentially in their personnel file.
- If a candidate fails to declare at the interview stage that their DBS certificate will or might not be clear, and this proves to be the case, they will not be appointed as a member of staff.
- We verify, where necessary, that the successful applicant has all the academic or work-related qualifications claimed and request the original academic & professional qualifications and certificates, including proof of qualified teacher status (QTS); we do not accept photocopies.
- We verify the successful candidate's identity and right to work in the UK; again, only original documents are accepted. National Insurance numbers are also recorded on the Single Central Record (SCR).
- We verify that the candidate has the health and physical capacity for the job using a standard medical questionnaire. This form is completed after the interview process, so does not affect the appointment decision. It is, however, possible that a medical condition or health complaint could prevent an otherwise successful candidate from being able to meet the requirements of our conditional offer of employment. This will only apply if the health issue or concern renders the candidate unable to fulfil the requirements of the role, as laid out in the job description.

- Any candidate who has lived or worked in a foreign country (anywhere outside of the United Kingdom) for longer than three months, during their adult life, will be required to undertake overseas checks. The nature, accessibility and speed of these checks may vary from country to country, but no candidate will be able to commence work until these checks are underway.
- Though it is not a statutory requirement, all staff who will have regular access to CYP will have a 'prohibition from teaching' check undertaken before they can commence employment.
- A S.128 prohibition from management check will be carried out if a member of staff joins the senior leadership team or Management Committee.

20.9 After Appointment

The successful candidate will be given a formal offer letter and issued with a contract in due course.

All offers of employment are dependent on the satisfactory completion and return and clearance of all requested forms and checks.

- Newly appointed staff are issued with a copy of our staff handbook and shown where to find our key policies; they must sign to confirm they have read and understood these documents.
- All new staff complete an induction with their line manager and a safeguarding induction with the DSL or deputy DSL, which includes familiarisation with 'Keeping Children Safe in Education' (KCSIE) (September, 2021). All staff have access to KCSIE on our shared drive ADO and must read it and sign to say they have done so. Similarly, staff must sign to declare that they have received a safeguarding induction, have read, understood and agree to adhere to our policies and procedures and have sought clarity on anything that remains unclear to them. This is recorded on the SCR and retained in the employee's personnel file.

We will refer to the Disclosure & Barring Service any person whose checks reveal that they have sought work when barred from working with children.

We will always supervise staff and act on any concerns that relate to the safeguarding of children. All our schools are covered by CCTV throughout and staff are closely monitored at all times, within reason.

20.10 Training

All staff will undertake child protection and safeguarding training within their first six weeks of employment. This will include the procedures for spotting signs and behaviours of abuse and abusers, recording and reporting concerns and creating a safe and secure environment

for all service users. ADO employs a strict internal training regime, led by a qualified BACP counsellor and qualified trainer.

The DSL undertakes specific training for the local authority and accesses regular updates to developments within this field. We provide adequate and appropriate staffing resources to meet the needs of our customers and visitors, ensuring correct ratios are applied where necessary. Refer to our Staffing and Recruitment policy for further information.

21 Supervision Of Staff & Managing Allegations Of Abuse Against Them

21.1 Procedure

Our procedures for managing allegations of abuse against members of staff ensure that any allegation of abuse made against an educator or other member of staff is dealt with very quickly, in a fair and consistent way that provides effective protection for the service user and at the same time supports the person who is the subject of the allegation.

All allegations made should be reported immediately, normally to the Designated Safeguarding Director (DSD) or (if this person is the subject of the allegation then this should be reported to the Designated Safeguarding Lead). Government guidance in 'Keeping Children Safe in Education (2021)' will be adhered to.

Our own internal contracted guidelines centred on whistleblowing, disciplinary or suspension procedures for each individual employee or volunteer will be followed as deemed necessary. A thorough internal investigation will begin to record any evidence.

The school must then involve the LADO if the allegations require further investigation. If service users make the allegation the LADO will be informed immediately for advice and guidance. A full internal investigation will continue to determine how this will be progressed, handled and the likely outcomes including the requirement for further escalation to the appropriate authorities.

In response to an allegation, suspending the member of staff is not the default response, unless there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded by ADO leaders and the individual notified of the reasons.

Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or dismissed as insufficient evidence will not be referred to in employer references.

Students, service users or parent-carers who have made malicious or defamatory allegations will be referred back to their origin of contractual obligations. This may result in dismissal, cancellation of contract or legal action against them.

The procedures for dealing with allegations should be applied with common sense. However, it is important that even allegations that appear less serious are responded to appropriately.

- The recipient of an allegation must report it to Designated Safeguarding Director (DSD) as soon as possible and never try to investigate it themselves. If the Designated Safeguarding Director (DSD) is implicated, it must be reported to the Designated Safeguarding Lead (DSL).
- A record of the report must be made by the DSD, except if they are implicated which must be timed, dated and include a clearly written name and signature.
- If the allegation is serious and credible and alleges that a member of staff has a) behaved in a way that has harmed or may have harmed a service user or student, b) possibly committed a criminal offence against or related to a service user or student, or c) behaved towards a service user in a way that indicated they are unsuitable to work with children, the LADO should be informed on the same day.
- If unsure, call the LADO in any case to discuss the allegation. Such consultation will enable the LADO and the Head or Senior Management to consider the nature, content and context of the allegation and agree a course of action.
- If this leads to a decision that no further action is to be taken this decision and the reasons for it should be recorded by both ADO's senior leader and the LADO. They should agree between them the information that should be put in writing to the individual about whom the allegation was made. Both should then consider the action that should follow in respect of that individual and also the person (or persons) who made the allegation.
- If it is decided that the allegation warrants further action the LADO will take this forward.
- The DSD should inform the accused person about the allegation as soon as possible, but only after consulting the LADO about whether this is appropriate at this stage and what information can be given to the person.

Consideration must be given as to whether it is necessary to remove the subject of the allegations from contact with service users in ADO Services, pending investigations and procedures arising from the allegation. Suspension should not be automatic but should be considered if there is cause to suspect a service user is at risk of significant harm, the allegation warrants investigation by the police, or the allegation is so serious that it might be grounds for dismissal. Any decision to suspend shall be taken only after consultation with the LADO. This will take into account the safety of the service users involved and the impact on any enquiry.

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within 24 hours, giving the reasons for the suspension. The person should be

informed at that point who their named contact is within the organisation and provided with their contact details.

The subject of the allegations (whether suspended or not) shall be treated fairly and honestly and helped to understand the concerns expressed, processes involved and possible outcomes. They should be kept informed of the progress of the case and of the investigation and clearly informed of the outcome of any investigation and the implications for disciplinary or related processes. They should be provided with an appropriate level of support.

A Senior Manager, usually the DSD (or DSL should the DSD be the subject of the investigation), shall be responsible for continuing liaison with the Bexley LADO and all communication between ADO Services and other agencies that may be involved in processes following an allegation.

Confidentiality is essential and information about an allegation must be restricted to those who have a need to know in order to protect service users and students, facilitate enquiries, avoid victimisation, safeguard the rights of the person about whom the allegation has been made and others who might be affected, and manage disciplinary or complaints aspects.

Following the conclusion of ADO's child protection processes, if further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of service users or other vulnerable witnesses.

Support will be provided to all those involved in an allegation throughout the external investigation in line with support and advice of the appropriate authorities. All enquiries, external investigations, interviews will be documented and kept in a locked file. Unfounded allegations will result in all rights being re-instated.

Founded allegations will be passed on to the relevant organisation (the Police and DBS support) and will result in the termination of employment. The appropriate authorities will also be required to notify the Independent Safeguarding Authority (ISA) to ensure their records are updated.

All records will be kept until the person reaches normal retirement age or for 10 years if that is longer. This will ensure accurate information is available for references and future DBS checks and avoid any unnecessary re-investigation.

The company retains the right to dismiss any member of staff in connection with founded allegations following an inquiry. Counselling will be available for any staff member of the company who is affected by an allegation, their colleagues and the parents.

WHO WILL LEAD AN INVESTIGATION IN THE FIRST PLACE?	
If there is a concern about:	Who will investigate?
Any member or members of staff below the Quality Assurance Manager , then...	The Quality Assurance Manager and DSL will lead the investigation
The Quality Assurance Manager , then...	The Designated Safeguarding Director will lead the investigation
The Designated Safeguarding Director , then...	The Local Authority Designated Officer (LADO) will lead the investigation
Any other Director, then...	The Local Authority Designated Officer (LADO) will lead the investigation

The Local Authority Designated Officer (LADO) can be contacted directly by telephone on 020 3045 3436 or via the Multi Agency Safeguarding Hub (MASH) on 020 3045 5440.

Please also see our **Whistleblowing Policy** to which all staff have access, and which will enable them to share any concerns that may arise about their colleagues in an appropriate manner.

21.2 Dismissal & Duty Of Care

We have a duty to refer a person who is deemed unsuitable to work with children to the Disclosure & Barring Service (DBS).

Specifically, we refer to the DBS any member of staff who;

- Has harmed, or poses a risk of harm, to a child
- Has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence
- Is dismissed or receives disciplinary action because of misconduct relating to a child
- Leaves their employment during an investigation related to misconduct relating to a child

The DBS will then consider whether to bar the person. Referrals will be made as soon as possible after the resignation or removal of the individual.

21.3 Safe Practice

We ensure that all staff are clear about the expectations we have of their behaviour towards all service users or students and that any incident that falls below our expected standards will be dealt with appropriately, as per our staff conduct and disciplinary procedures.

21.4 Childcare Disqualification

ADO is fully cognisant of legislation relating to childcare disqualification which can be (for instance) for inclusion on the Children's Barred List, being cautioned for specific offences against children, grounds related to the care of children, having childcare or children's home registration refused or cancelled and or for being disqualified from private fostering. It can also be 'disqualification by association' i.e., when an employee lives in the same household as someone else who is disqualified. ADO Services also ask employees about childcare disqualification or disqualification by association.

22 Review

All ADO policies and procedures follow ITIL guidelines to ensure version control, change control and release management of any documents. As a matter of policy, documents can be updated at any time to reflect changes to ADO procedures, legal changes, OFSTED directives or any other reason to ensure the policies and procedures are accurate and correct. This involves consultation with stakeholders, management committee and approval from the directors. All policies and procedures are reviewed at the very least on an annual basis. Regular communication through newsletters, social media, text systems and through our website within the ADO Library is part of our Release Management.

23 References

All internal ADO References can be found highlighted in this document.

All external links are highlighted in *red italics*.

24 Contact

This document was produced by the ADO Operations team in partnership with Garrie-John Barnes. This version supersedes any previous versions and will be reviewed annually.

All correspondence with regard to this policy, or any other operational policy and procedure should be directed to the ADO Chief Operating Officer by e-mailing gmp@adoservices.co.uk or calling 0208 855 6778, requesting to speak to the Chief Operating Officer or in writing c/o Chief Operating Officer, ADO SERVICES C.I.C, 126 Upper Wickham Lane, Welling, Kent DA16 3DP.

APPENDIX 1

INFORMATION & GUIDANCE FOR STAFF

These guidelines should be followed when staff are dealing with both individual and small groups of service users or students. Be mindful at all times of your behaviour in relationship to individuals and small groups of service users and students and of the potential risk of an allegation.

Take all necessary precautions in order to minimise the opportunity for an allegation to be made and use your common sense. Specifically, take note of the following points:

- Whenever possible, try not to be alone in a room with a service user, regardless of gender. If you are on your own with a service user, leave the door open and, if possible, inform a colleague of your whereabouts. ALWAYS keep an appropriate distance between you and the service user
- Do not engage in conversations about your personal life with service users
- Keep boundaries very clear between you and service users, especially if conversation involves relationships, emotions, and/or sexual content
- Do not exchange mobile phone numbers with service users. If possible, do not have your mobile phone out when dealing with an individual service user
- Do not accept service users (or their family members) as 'friends' or links on social networking websites or mobile phone apps
- If a service user wishes to disclose personal information to you, ensure that they understand that you cannot guarantee confidentiality. Do not ask service users probing questions about their personal life unless they approach you first. Avoid giving advice to service users about their relationships

APPENDIX 2

DEFINITIONS & CATEGORIES OF CHILD ABUSE

All CYP have certain basic needs, which include:

- Physical care and protection
- Affection and approval
- Stimulation and approval
- Discipline and control that is consistent and appropriate to age
- The opportunity to gradually acquire self-esteem, confidence, independence and responsibility that are age appropriate.

Individual cases must always be treated on their own merits; however, in general terms, the following definition should provide the bases for action under these guidelines:

“A CYP is considered to be in need of protection when the basic needs of that child are not being met through avoidable acts of either commission or omission”.

Before a CYP is placed on a Child Protection Plan a conference must decide that there is, or is a likelihood of, significant harm leading to the need for a plan. The following are used for the plan. They are intended to provide definitions as a guide; in some instances, more than one category may be appropriate.

NEGLECT OVERVIEW

The persistent or severe neglect of a CYP or the failure to protect a CYP from exposure to any kind of danger, including cold or starvation, or extreme failure to carry out an important aspect of care, resulting in the significant impairment of the child’s health or development, including non-organic failure to thrive.

NEGLECT EXAMPLES

Severe neglect is associated with major retardation of cognitive functioning as well as growth. It is recognised through a typical pattern of poor growth, poor hygiene, withdrawal and in extreme cases a pseudo-autistic state, all of which can rapidly reverse in alternative care.

Although neglect has one of the most pervasive effects on development and is one of the most frequent forms of abuse, it is an area which is frequently neglected by professionals. Like parents, professionals can feel overwhelmed and hopeless by large families living in squalid conditions.

Signs to look out for:

- Dirty unkempt appearance of CYP, in overall poor condition
- Thin wispy hair
- Underweight CYP, diarrhoea may indicate poor nutrition
- An undernourished CYP may be unduly solemn or unresponsive, or may be overeager to obtain food
- An under-stimulated CYP may not reach expected milestones
- Behaviour and developmental difficulties that cannot be explained by clinical factors

Associated factors include;

- Neglected CYP frequently come from homes where there is:
- A parent who is lonely, isolated, unsupported or depressed
- Poor inter-parental relationship or domestic violence
- A parent who is abusing drugs or alcohol
- A large number of CYP living in cramped or very poor conditions

PHYSICAL ABUSE OVERVIEW

Physical injury to a CYP including deliberately poisoning, where there is definite knowledge, or a reasonable suspicion, that the injury was inflicted or knowingly not prevented.

PHYSICAL ABUSE (NON-ACCIDENTAL INJURIES) EXAMPLES

It should not be assumed that an injury to a part of the body normally vulnerable to accidental injury has necessarily been caused accidentally. It could be non-accidental. All injuries to CYP, which do not easily come into the category of normal bumps and scrapes, should be seen by a doctor.

Certain parts of the body are more commonly subjected to non-accidental injury. These include the upper arm, where a CYP may be gripped or shaken, the back, and the buttocks. Multiple injuries of various types, ages and location are common features of physical abuse.

Most non-accidental injuries leave marks on the body. PE teachers are therefore often key people in the identification of this form of abuse, as they regularly see the CYP partially dressed.

Signs to look out for:

- CYP who show a reluctance to undress or to expose parts of their bodies should be monitored as CYP who may have suffered physical injury
- Unexplained absences
- Physical signs of injury
- Unexplained or confused accounts of how an injury occurred
- Explanation of an injury which appears to be inappropriate to the nature and age of the injury

COMMON MEDICAL-PHYSICAL FACTORS ASSOCIATED WITH PHYSICAL ABUSE

Bruising

- Facial bruising around the mouth and ears
- Groups of small bruises
- Black eyes without a forehead injury, particularly if both eyes are affected
- Weal marks or outline of bruising (e.g. hand mark)
- Bruising of soft tissue with no obvious explanation (most bruises occur on bony protuberances such as the temple or shin)
- Bruises on the back, back of legs, stomach, chest or neck
- Bruises or cuts to mouth or tongue (e.g. split frenulum)
- Pinch marks are found in pairs and may be seen on the back, buttocks, arms or cheeks

Bites

Bites leave clear impressions of teeth and some bruising, they are never accidental

Parents sometimes claim that bites have been made by other CYP or animals. It is therefore important to check the size and shape of the injury. If the impression is more than 3cms across it will have been caused by an adult or adolescent

Bites can be inflicted almost anywhere on the body

Burns and Scalds

CYP will sometimes suffer minor burns through hot irons etc., but it is uncommon for multiple burns to be caused accidentally

A cigarette burn is characteristically round but may have a tail when dragged against the skin and is surrounded by an area of inflamed skin. Cigarette burns can be found in groups and can be found on any part of the body

Scalds from boiling water may result from lack of supervision, or non-accidentally. A CYP is very unlikely to sit down willingly in very hot water; therefore, they cannot scald a bottom accidentally without also scalding the feet

Burns or scalds are particularly worrying as a degree of sadism may be involved when such injuries are inflicted

Associated Factors of Physical Abuse

- Injuries not consistent with explanation given by parent (even if agreed by the CYP)
- Circumstances where parent delays seeking medical advice
- A history of repeated injuries or presentation to A&E
- Consent for a medical refused by parent
- Desire of a parent to attribute blame elsewhere
- Distant or mechanical handling of the CYP by the parent

SEXUAL ABUSE OVERVIEW

The involvement of dependent, developmentally immature CYP in sexual activities they do not truly comprehend and to which they are unable to give informed consent, or that violate the social taboos of family roles.

SEXUAL ABUSE EXAMPLES

The traumatic effects of CYP sexual abuse can be far-reaching and enduring, impacting on a CYP'S cognitive, behavioural and social development. The earlier the abuse occurs, the more adversely subsequent stages of development may be affected. The longer the abuse continues, the more extensive it is e.g. involving penetrative abuse, the greater the number

of developmental stages that abuse continues through, the more disturbed the CYP is likely to be. Children who have suffered chronic long-term sexual abuse tend to have very negative feelings about themselves and all aspects of their relationships.

Sexual abuse can be one or more of the following:

- Rape – genital and or oral intercourse
- Digital penetration or penetration with an object
- Mutual masturbation
- Inappropriate fondling
- Taking pornographic photographs or exposing the CYP to pornographic materials
- Forcing the CYP to observe others involved in sexual activities

Both boys and girls can suffer from sexual abuse. Both men and women can be perpetrators. Boys and girls who disclose sexual abuse from a female perpetrator are often met with disbelief. It is therefore important to listen to what a child says without being judgemental. Abusers can be parents, friends, teachers, childcare workers, clergymen or strangers. Warning CYP about 'Stranger Danger' should therefore only form part of any CYP protection programme.

Signs to look out for:

- A CYP who demonstrates inappropriate sexual interest and activity, through play or drawings
- Sexualised behaviour, masturbation and sex play which often leaves the peer group confused or embarrassed
- A CYP having excessive preoccupation with, or precocious knowledge of adult sexual behaviours
- A CYP who shows a marked fear of adults, usually men, but occasionally men and women
- A CYP who presents as depressed and where there may be instances of drug or alcohol abuse, suicide attempts or running away
- A CYP who suddenly starts to wet or soil
- A CYP who takes over the role of wife / mother within the family
- A CYP whose concentration and academic performance suddenly deteriorates
- A CYP who avoids medical examination or is reluctant to change for PE
- A child who has low self-esteem and few friends
- Aggressive behaviour from a normally quiet CYP, or withdrawn behaviour from a normally boisterous CYP
- Frequent unexplained absences or lateness
- A CYP who talks of nightmares and being unable to sleep; a CYP who may be excessively tired
- Arson

- Pregnancy in young teenagers where the identity of the father is vague or unknown
- Recurrent urinary tract infections
- Signs of sexually transmitted infections and overall dishevelled appearance

EMOTIONAL ABUSE OVERVIEW

Actual or likely severe adverse effect on the emotional and behavioural development of a CYP caused by persistent or severe emotional ill-treatment or rejection. All forms of abuse involve some emotional ill-treatment.

EMOTIONAL ABUSE EXAMPLES

Emotional or psychological abuse can be defined as the destruction of the CYP's competence to be able to function in a social situation. The CYP may be denied appropriate contact with peers within or outside of school and be forced to take on a particular role in relation to parents, which is detrimental to the CYP's ability to function appropriately in social contexts. This type of abuse is very difficult to identify as there are no physical signs – symptoms are usually apparent via a CYP's behaviour and demeanour.

It is important to note that the emotional or psychological abuse is present in all other forms of abuse, but this category is only used when it is the sole form of abuse.

Signs to look out for:

- A CYP may be inducted into a parental care-taking role and not be encouraged to be involved with appropriate play
- A CYP may be used as a parent's confidant to a degree that is harmful to their psychological development
- A CYP may be ignored, rejected or denigrated by a parent
- A CYP may be terrorised by a parent or others so that she / he is overly fearful and watchful
- A parent who is unable to be responsive to a CYP's emotional needs, who may be emotionally distant and or excessively negative and hostile
- A CYP (usually of a mentally ill or disturbed parent) who is inducted into a parent's delusionary state or paranoid beliefs
- A CYP who is cripplingly over-protected and not given freedom to act at an age appropriate level
- A parent who provides only conditional love with threats of withdrawal of love.
- Behavioural definitions are very difficult to quantify because most CYP experience some of these acts from time to time, and because the impact of a single or seldom occurring act of abuse will not have severe and harmful effects. The harm of emotional maltreatment results from the cumulative effects of repeated acts of psychological abuse.

Associated Factors of Emotional Abuse

CYP who suffer from emotional abuse frequently come from homes where there is:

- A mentally ill or disturbed parent
- Drug or alcohol abuse
- A parent who is socially isolated, unsupported or depressed, or conversely, a parent who has a very active social life with very little time or energy to give to childcare
- A parent who has poor social skills, who may have learning difficulties and lack of knowledge about CYP's age appropriate needs
- A parent who has suffered severe abuse within their own childhood
- A household where there is 'adult on adult' domestic violence

Many parents who emotionally abuse their CYP are unaware that what they are doing is harmful. Because of their own life experiences, they may have a distorted view of parenting and their role as a mother or father.

APPENDIX 3

EXAMPLE OF THE VISITOR INFORMATION

Nothing is more important than the safety and well-being of our service users and students. We ask that you take some time to familiarise yourself with some key safeguarding points.

ADO is committed to safeguarding and promoting the welfare of all our service users especially vulnerable service users and students and expects all staff and visitors to share this commitment.

- Our philosophy is to always 'think the unthinkable'.
- Any visitor will be accompanied at all times by a member of staff to ensure the safety and wellbeing of our service users.
- Be aware that we have secure entrances and exits to ensure the safety of our service users; please be vigilant when walking through.
- If you have a safeguarding or child protection concern please report what has been disclosed to one of our designated safeguarding leads below as soon as possible, who will record and act, if appropriate, on the information.
- Remember that if there is a risk of immediate serious harm to a service user a referral can and should be made to children's social care services immediately and that anybody can make a referral.

APPENDIX 4

SECURITY OR INTRUSION ALERT

If it is brought to the attention of staff or session leaders that an unfamiliar person had entered any sites under safeguarding controls, the staff member who has identified this intrusion will call the other team members on their walkie-talkie and notify them of the 'code word'.

The code word allows the team to find out promptly that there is a potential unsafe person within the space or grounds. When the code word has been shared, the team will work to ensure all CYP are taken into the secure area and a senior member of staff or the Land Support Supervisor will go off to investigate. (Please see section 9.2)

The unfamiliar person should be challenged in the following way:

- They should be approached with caution at a reasonable distance and told politely that they are in a private area not open to the public and under safeguarding control and should leave immediately.
- If they comply, they should be escorted out of the space or grounds.
- If they refuse to leave, the member of staff should warn them that they are trespassing and if they do not leave, the police would be notified. At no point should they be physically moved.
- If they comply, they should be escorted out of the space or grounds.
- If they still refuse to leave the police should be called and the remainder of the team in the safe area should be notified by walkie-talkie.
- The staff, and CYP should resume sessions only once the all clear is given by the unfamiliar person leaving or through police intervention.

Further information can be found in the **ADO Site Security Policy**.

APPENDIX 5

SAFEGUARDING & CHILD PROTECTION KEY ADO CONTACTS SUMMARY SHEET

Name: Victoria McHolland-Pilcher

Role: Designated Safeguarding Director (DSD)

Tel: 020 8850 6778

Email: victoria@adoservices.co.uk

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Name: Katie Palmer

Role: Designated Safeguarding Lead (DSL)

Tel: 020 8850 6678

Email: kate@adoservices.co.uk