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Reviewed February 2019
Next review date February 2020

PART 1 SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

Purpose

This document outlines The Big House's policy on responding to concerns regarding the safeguarding and protection of children, young people and vulnerable adults. Combined with the associated procedures, and guidance, the policy provides a structure for all staff that may come across concerns of this nature within the context of their work.

Who the policy applies to

This policy applies to all staff and volunteers. In this instance, staff and volunteers relates to all paid employees, seconded staff, mentors, students, agency workers, contract, seasonal and unpaid staff, working on behalf of The Big House in any capacity and in any setting, and includes non-work related personal conduct.

Please note in all circumstances any seconded staff, mentors, students, agency workers, contract, seasonal and unpaid staff should always refer to paid employees in the first instance when a safeguarding concern has been identified. It is the responsibility of these individuals to remain alert and aware and report any concerns immediately. It is not the responsibility for these individuals to undertake any further action.

The policy relates to all young people with whom The Big House comes into contact with, directly or indirectly, and also relates to children outside the scope of The Big House's work where reasonable concerns are raised by a third party i.e. friends, children, siblings etc.

Why we have this policy

The Big House is committed to providing a safe and supportive environment in its work with children and young people. This policy aims to:

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- Ensure a safe and supportive environment for children, young people and vulnerable adults who receive The Big House's services, as well as for staff and volunteers.
- Provide all staff and volunteers with guidance on procedures they should adopt in the event that they suspect that a child, young person or vulnerable adult may be experiencing, or be at risk from, some form of harm.
- Ensure that staff are experienced and equipped to make clear and consistent responses to disclosure/allegations or suspicions of abuse; and that volunteers are aware of the procedures for reporting any concerns.
- Put in place management responsibilities and structures to support the policy and the responsibilities of staff within their duty of care.
- Provide a code of conduct for staff and volunteers and identify areas of good practice in working professionally and safely with children and young people.

Context

The Big House has developed policies, procedures and guidance across the scope of its work, which support this policy's aims in safeguarding children, young people, and vulnerable adults.

The Big House recognises that all children and young people have the right to freedom from abuse. In all work with children and young people The Big House will ensure that the welfare and safety of the child/young person is paramount and that we constantly strive to provide an environment free from abuse through implementation of appropriate policies and guidelines. We extend this safeguarding commitment to our work supporting vulnerable adults.

We will

- Listen to and seek the views of the children and young people we work with to ensure we consider their wishes and feelings when reaching decisions that affect them as individuals and in the development and improvement of our services.
- Ensure that all paid staff, Trustee and volunteer recruitment and induction practices include appropriate vetting procedures, including all paid staff and Trustees to be DBS checked and volunteers if they will be lone working with a child.
- Ensure that all staff and volunteers are aware of the risk of abuse and receive ongoing instruction and training in safeguarding and good practice and respond

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swiftly and appropriately to all concerns or allegations of child abuse within a procedure that: respects and empowers the child/young person; is supportive of The Big House staff and volunteers; and avoids collusion with the suspected perpetrator of abuse.

- Appoint a Safeguarding Advisor who has a specific responsibility for monitoring and evaluating safeguarding practice, ensuring the organisation is kept up to date with evolving safeguarding practice and providing the main reference for advising and coordinating Safeguarding cases.
- Ensure access to confidential information is restricted to the appropriate staff.
- Seek external advice and expertise when reviewing our Safeguarding Policy, practice and guidelines.
- Ensure safeguarding processes are continually monitored, reviewed, and audited at regular intervals.

The Big House values and will respond promptly and constructively to all information presented by young people or third parties regarding the safety and welfare of children and young people. We believe that working in partnership with children, young people, their parents, carers and other agencies is key to promoting the welfare of young people.

Key roles in the organisation

Board of Trustees:

Anne Currell (Chairman)

Tim Wright

James Duke

Ziyad Marar

Krishna Patel (Treasurer)

Mhairi Letcher

Charles Leadbeater

Victoria Fea

Sally Bartolo

Emma Corbett (Trustee Safeguarding Lead)

CEO/Deputy Safeguarding Lead: Maggie Norris

Engagement Manager and Designated Safeguarding Lead: Sara Williams

Finance and Operations Director: Stacie Novotny Bond

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Fundraising Manager: Cat Smith

Development Manager: Lydia Hayes

Types of Abuse

The definitions of child abuse by the Home Office/NSPCC (2018) are as follows:

Physical	<p>Physical abuse happens when a child is deliberately hurt, causing injuries such as cuts, bruises, burns and broken bones. It can involve hitting, kicking, shaking, throwing, poisoning, burning or suffocating.</p> <p>It's also physical abuse if a parent or carer makes up or causes the symptoms of illness in children. For example, they may give them medicine they don't need, making them unwell. This is known as fabricated or induced illness (FII).</p>
Sexual	<p>Sexual abuse is forcing or enticing a child to take part in sexual activities. It doesn't necessarily involve violence and the child may not be aware that what is happening is abuse.</p> <p>Child sexual abuse can involve contact abuse and/or non-contact abuse. Contact abuse happens when the abuser makes physical contact with the child.</p> <p>It includes:</p> <ul style="list-style-type: none">• sexual touching of any part of the body whether the child is wearing clothes or not.• rape or penetration by putting an object or body part inside a child's mouth, vagina or anus• forcing or encouraging a child to take part in sexual activity• making a child take their clothes off, touch someone else's genitals or masturbate. <p>Non-contact abuse involves non-touching activities. It can happen online or in person and includes:</p>

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- encouraging a child to watch or hear sexual acts
- not taking proper measures to prevent a child being exposed to sexual activities by others
- showing pornography to a child
- making, viewing or distributing child abuse images
- allowing someone else to make, view or distribute child abuse images.

Online sexual abuse includes:

- persuading or forcing a child to send or post sexually explicit images of themselves, this is sometimes referred to as sexting
- persuading or forcing a child to take part in sexual activities via a webcam or smartphone
- having sexual conversations with a child by text or online
- meeting a child following online sexual grooming with the intent of abusing them.

Abusers may threaten to send sexually explicit images, video or copies of sexual conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the abuse has stopped. Abusers will often try to build an emotional connection with a child in order to gain their trust for the purposes of sexual abuse. This is known as grooming.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a type of sexual abuse. Young people in exploitative situations and relationships receive things such as gifts, money, drugs, alcohol, status or affection in exchange for taking part in sexual activities.

Young people may be tricked into believing they're in a loving, consensual relationship. They often trust their abuser and don't understand that they're being abused. They may depend on their abuser or be too scared to tell anyone what's happening. They might be invited to parties and given drugs and alcohol before being sexually exploited. They can also be groomed and exploited online.

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	<p>Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs (Berelowitz et al, 2013).</p> <p>Child sexual exploitation can involve violent, humiliating and degrading sexual assaults and involve multiple perpetrators.</p>
<p>Harmful sexual behaviour</p>	<p>Children and young people who develop harmful sexual behaviour (HSB) harm themselves and others.</p> <p>HSB can include:</p> <ul style="list-style-type: none"> • using sexually explicit words and phrases • inappropriate touching • using sexual violence or threats • full penetrative sex with other children or adults. <p>Sexual behaviour between children is also considered harmful if 1 of the children is much older – particularly if there is more than 2 years’ difference in age or if 1 of the children is pre-pubescent and the other isn’t (Davies, 2012). However, a younger child can abuse an older child, particularly if they have power over them – for example, if the older child is disabled (Rich, 2011).</p>
<p>Emotional</p>	<p>Emotional abuse is persistent and, over time, it severely damages a child’s emotional health and development.</p> <p>It involves:</p> <ul style="list-style-type: none"> • humiliating, putting down or constantly criticising a child • shouting at or threatening a child or calling them names • mocking a child or making them perform degrading acts • constantly blaming or scapegoating a child for things which are not their fault • trying to control a child’s life and not recognising their individuality • not allowing them to have friends or develop socially • pushing a child too hard or not recognising their limitations • manipulating a child • exposing a child to distressing events or interactions such as drug taking, heavy drinking or domestic abuse • persistently ignoring them

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	<ul style="list-style-type: none">• being cold and emotionally unavailable during interactions with a child• never saying anything kind, positive or encouraging to a child and failing to praise their achievements and successes.
Neglect	<p>Neglect is persistently failing to meet a child's basic physical and/or psychological needs usually resulting in serious damage to their health and development. Neglect may involve a parent's or carer's failure to:</p> <ul style="list-style-type: none">• provide adequate food, clothing or shelter• supervise a child (including leaving them with unsuitable carers) or keep them safe from harm or danger• make sure the child receives appropriate health and/or dental care• make sure the child receives a suitable education• meet the child's basic emotional needs – parents may ignore their children when they are distressed or even when they are happy or excited. <p>This is known as emotional neglect. Neglect is the most common type of child abuse. It often happens at the same time as other types of abuse.</p>
Domestic abuse	<p>Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people who are or were in an intimate relationship. There are many different types of abusive behaviours that can occur within intimate relationships, including emotional, sexual, financial, psychological and physical abuse. Domestic abuse can be underpinned by an on-going pattern of psychologically abusive behaviour (coercive control) that is used by 1 partner to control or intimidate the other partner.</p> <p>In situations of domestic abuse, both males and females can be abused or be abusers. Domestic abuse can happen in any relationship regardless of age, sexuality, gender identity, race or religious identity. Research by the NSPCC has indicated that many young people experience domestic abuse in their own intimate relationships (Barter, 2009). The UK's cross-government definition</p>

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of domestic abuse also covers relationships between young people aged 16 and 17 (Home Office, 2013).

Children's exposure to domestic abuse between parents and carers is child abuse. Children can be directly involved in incidents of domestic abuse or they may be harmed by seeing or hearing abuse happening. The developmental and behavioural impact of witnessing domestic abuse is similar to experiencing direct abuse. Children in homes where there is domestic abuse are also at risk of other types of abuse or neglect.

Bullying and cyberbullying

Bullying is behaviour that hurts someone else. It usually happens over a lengthy period of time and can harm a child both physically and emotionally. Bullying includes:

- verbal abuse, such as name calling
- non-verbal abuse, such as hand signs or glaring
- emotional abuse, such as threatening, intimidating or humiliating someone
- exclusion, such as ignoring or isolating someone
- undermining, by constant criticism or spreading rumours
- controlling or manipulating someone
- racial, sexual or homophobic bullying
- physical assaults, such as hitting and pushing
- making silent, hoax or abusive calls.

Bullying can happen anywhere – at school, at home or online. When bullying happens online it can involve social networks, games and mobile devices. Online bullying can also be known as cyberbullying. Cyberbullying includes:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- 'trolling' - sending menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll

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	<ul style="list-style-type: none"> • creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name.
<p>Child trafficking</p>	<p>Child trafficking is child abuse. It involves recruiting and moving children who are then exploited. Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another.</p> <p>Children are trafficked for:</p> <ul style="list-style-type: none"> • child sexual exploitation • benefit fraud • forced marriage • domestic servitude such as cleaning, childcare, cooking • forced labour in factories or agriculture • criminal exploitation such as cannabis cultivation, pickpocketing, begging, transporting, drugs, selling pirated DVDs and bag theft. <p>Children who are trafficked experience many forms of abuse and neglect. Physical, sexual and emotional abuse is often used to control them and they're also likely to suffer physical and emotional neglect.</p> <p>Child trafficking can require a network of organised criminals who recruit, transport and exploit children and young people. Some people in the network might not be directly involved in trafficking a child but play a part in other ways, such as falsifying documents, bribery, owning or renting premises or money laundering (Europol, 2011). Child trafficking can also be organised by individuals and the children's own families.</p> <p>Traffickers trick, force or persuade children to leave their homes. They use grooming techniques to gain the trust of a child, family or community. Although these are methods used by traffickers, coercion, violence or threats don't need to be proven in cases of child trafficking - a child cannot legally consent to their exploitation so child trafficking only requires evidence of movement and exploitation.</p>

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	<p>Modern slavery is another term which may be used in relation to child trafficking. Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking (HM Government, 2014). The Modern Slavery Act passed in 2015 in England and Wales categorises offences of slavery, servitude, forced or compulsory labour and human trafficking (NCA, 2017).</p>
<p>Female genital mutilation</p>	<p>Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting.</p> <p>The age at which FGM is carried out varies. It may be carried out when a girl is newborn, during childhood or adolescence, just before marriage or during pregnancy (Home Office et al, 2016).</p> <p>Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence.</p> <p>There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It's used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.</p>

The following may be signs of abuse:

<p>Physical</p>	<p>Injuries that are more likely to indicate physical abuse include:</p> <p>Bruising:</p> <ul style="list-style-type: none"> • bruises on babies who are not yet crawling or walking • bruises on the cheeks, ears, palms, arms and feet • bruises on the back, buttocks, tummy, hips and backs of legs • multiple bruises in clusters, usually on the upper arms or outer thighs • bruising which looks like it has been caused by fingers, a hand or an object, like a belt or shoe • large oval-shaped bite marks. <p>Burns or scalds:</p>
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	<ul style="list-style-type: none"> • any burns which have a clear shape of an object, for example cigarette burns • burns to the backs of hands, feet, legs, genitals or buttocks. <p>Other signs of physical abuse include multiple injuries (such as bruising, fractures) inflicted at different times.</p> <p>If a child is frequently injured, and if the bruises or injuries are unexplained or the explanation doesn't match the injury, this should be investigated. It's also concerning if there is a delay in seeking medical help for a child who has been injured.</p>
Sexual	<p>There may be physical signs that a child has suffered sexual abuse.</p> <p>These include:</p> <ul style="list-style-type: none"> • anal or vaginal soreness or itching • bruising or bleeding near the genital area • discomfort when walking or sitting down • an unusual discharge. • sexually transmitted infections (STI) • pregnancy. <p>Changes in the child's mood or behaviour may also cause concern. They may want to avoid spending time with specific people. In particular, the child may show sexual behaviour that is inappropriate for their age.</p> <p>For example:</p> <ul style="list-style-type: none"> • they could use sexual language or know things about sex that you wouldn't expect them to • a child might become sexually active at a young age • they might be promiscuous.
Child sexual exploitation	<p>Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour.</p> <p>Young people who are being sexually exploited may:</p> <ul style="list-style-type: none"> • go missing from home, care or education.

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	<ul style="list-style-type: none"> • be involved in abusive relationships, appearing intimidated and fearful of certain people or situations • hang out with groups of older people, or anti-social groups, or with other vulnerable peers • get involved in gangs, gang fights, gang membership • have older boyfriends or girlfriends • spend time at places of concern, such as hotels or known brothels • not know where they are, because they have been moved around the country • be involved in petty crime such as shoplifting • have access to drugs and alcohol • have new things such as clothes and mobile phones which they can't or won't explain • have unexplained physical injuries.
<p>Harmful sexual behaviour</p>	<p>It's normal for children to show signs of sexual behaviour at each stage in their development. Children also develop at different rates and some may be slightly more or less advanced than other children in their age group. Behaviours which might be concerning depend on the child's age and the situation.</p> <p>If you're unsure whether a child's sexual behaviour is healthy, Brook provide a helpful, easy-to-use traffic light tool. The traffic light system is used to describe healthy (green) sexual behaviours, potentially unhealthy (amber) sexual behaviours and unhealthy (red) sexual behaviours</p>
<p>Emotional</p>	<p>There aren't usually any obvious physical signs of emotional abuse but you may spot signs in a child's actions or emotions.</p> <p>It's important to remember that some children are naturally quiet and self-contained whilst others are more open and affectionate. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child or are particularly unusual for their stage of development.</p> <p>Babies and pre-school children who are being emotionally abused may:</p>

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- be overly-affectionate towards strangers or people they haven't known for very long
- not appear to have a close relationship with their parent, for example when being taken to or collected from nursery
- lack confidence or become wary or anxious
- be unable to play
- be aggressive or nasty towards other children and animals.

Older children may:

- use language, act in a way or know about things that you wouldn't expect for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends
- fear making mistakes
- fear their parent being approached regarding their behaviour
- self-harm.

Neglect

Neglect can be difficult to identify. Isolated signs may not mean that a child is suffering neglect, but multiple and persistent signs over time could indicate a serious problem. Some of these signs include:

- children who appear hungry - they may come to school without lunch money or even try to steal food
- children who appear dirty or smelly and whose clothes are unwashed or inadequate for the weather conditions
- children who are left alone or unsupervised
- children who fail to thrive or who have untreated injuries, health or dental problems
- children with poor language, communication or social skills for their stage of development
- children who live in an unsuitable home environment, for example the house is very dirty and unsafe, perhaps with evidence of substance misuse or violence
- children who have taken on the role of carer for other family members.

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Domestic abuse	<p>It can be difficult to tell if domestic abuse is happening, because it usually takes place in the family home and abusers can act very differently when other people are around. Children who witness domestic abuse may:</p> <ul style="list-style-type: none">• become aggressive• display anti-social behaviour• suffer from depression or anxiety• not do as well at school - due to difficulties at home or disruption of moving to and from refuges.
Bullying and cyberbullying	<p>It can be hard to know whether or not a child is being bullied. They might not tell anyone because they're scared the bullying will get worse. They might also think that the bullying is their fault. No one sign indicates for certain that a child's being bullied, but you should look out for:</p> <ul style="list-style-type: none">• belongings getting 'lost' or damaged• physical injuries such as unexplained bruises• being afraid to go to school, being mysteriously 'ill' each morning, or skipping school• not doing as well at school• asking for, or stealing, money (to give to a bully)• being nervous, losing confidence or becoming distressed and withdrawn• problems with eating or sleeping• bullying others
Child trafficking	<p>Signs that a child has been trafficked may not be obvious but you might notice unusual behaviour or events.</p> <p>These include a child who:</p> <ul style="list-style-type: none">• spends a lot of time doing household chores• rarely leaves their house, has no freedom of movement and no time for playing• is orphaned or living apart from their family, often in unregulated private foster care• lives in substandard accommodation• isn't sure which country, city or town they're in• is unable or reluctant to give details of accommodation or personal details• might not be registered with a school or a GP practice• has no documents or has falsified documents• has no access to their parents or guardians• is seen in inappropriate places such as brothels or factories

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- possesses unaccounted for money or goods
- is permanently deprived of a large part of their earnings, required to earn a minimum amount of money every day or pay off an exorbitant debt
- has injuries from workplace accidents
- gives a prepared story which is very similar to stories given by other children.

There are also signs that an adult is involved in child trafficking, such as:

- making multiple visa applications for different children
- acting as a guarantor for multiple visa applications for children
- travelling with different children who they're not related to or responsible for.
- insisting on remaining with and speaking for the child
- living with unrelated or newly arrived children
- abandoning a child or claiming not to know a child they were previously with.

Female genital mutilation

A girl at immediate risk of FGM may not know what's going to happen. But she might talk about or you may become aware of:

- a long holiday abroad or going 'home' to visit family
- relative or cutter visiting from abroad
- a special occasion or ceremony to 'become a woman' or get ready for marriage
- a female relative being cut – a sister, cousin or an older female relative such as a mother or aunt
- missing school repeatedly or running away from home.

A girl who has had FGM may:

- have difficulty walking, standing or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious or depressed
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear

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1.1 Key definitions

Safeguarding and promoting the welfare of children is defined for the purposes of this policy and procedure as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and;
- Undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

A child is defined in law (Children Act 1989) as anyone who has not reached their 18th birthday. In England and Wales, the terms 'child' or 'children' therefore refers to all young people under the age of 18 years. Child Protection legislation and guidance therefore only applies to those users of The Big House's services up to that age. The Big House also works with those over the age of 18 and recognises its duty of care to all the young people with whom it works, including those who can be described as vulnerable adults.

A vulnerable adult is defined by the Safeguarding Vulnerable Groups Act 2006 as a person who is aged 18 years or over and who is living in residential accommodation, such as a care home or a residential special school; who may need community care services by reason of mental or other disability, age and illness; detained in lawful custody and who may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation.

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

1.2 Responsibilities

The implementation of this policy is mandatory across the full scope of The Big House's work. Specific responsibilities are outlined below.

Chief Executive and Designated Safeguarding Lead (Maggie Norris and Sara Williams), responsible for ensuring:

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- The resource available to support staff on safeguarding/child protection issues is maintained;
- That safeguarding implications are constantly reviewed across the scope of the services The Big House delivers to young people and are fully considered in the development of all new pieces of work;
- The continued development of The Big House's approach to Safeguarding, considering and authorising any immediate changes in operational policy required due to a child protection incident or near miss;
- Safeguarding is considered in all appointments of staff (to include volunteers, freelance staff etc).

All staff and volunteers are expected to adhere to the requirements of the policy and operate within codes of conduct outlined within the various policies that support the work of The Big House.

Any behaviour by a member of staff or volunteer towards children or young people that contravenes the terms of this policy and procedure may be considered for disciplinary action, which in turn may lead to dismissal.

PART 2 ORGANISATIONAL PROCEDURES

Safeguarding Children and Vulnerable adults

2.1) Procedure to be followed when raising a concern

If you are concerned about the safety of a child i.e. you see or suspect abuse, an allegation of abuse is made or a child reports abuse, discuss your concerns with the Safeguarding Lead (Sara Williams).

Please note: Volunteers must ensure that they refer any concerns to their volunteer contact (Sara Williams). All volunteers will be given the volunteer policy and safeguarding policy to read as part of their induction.

Report concerns as soon as possible. This should normally be on the same working day. Do not delay in sharing the information and seeking further advice. As well as discussing your concerns with the Safeguarding Lead you should provide a written record (with dates and times) of what the child/young person has said (where this applies).

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The Safeguarding Lead (Sara Williams) will:

Discuss the concerns with The Big House CEO (Maggie Norris) and/or Board of Trustees Safeguarding Lead to decide the appropriate course of action, which may include notifying:

- the local authority designated officer
- the police and/or children's social care
- parents and/or referral agents.

In an emergency and where there is immediate risk to a child or young person, please act. It is essential to avoid delay as inaction may place the child at further risk. Inform the Safeguarding Lead (Sara Williams) as soon as possible. If contact cannot be made appropriate action should be undertaken e.g. contact the police in case of immediate danger to a child.

It is the responsibility of non-staff members (e.g. volunteers) to remain alert and aware and report any concerns immediately. It is not the responsibility for these individuals to undertake any further action.

The following guidance applies to paid employees only:

If a child, young person or vulnerable adult confides to someone that they are being, have been or believe that they may be abused, they have placed that person in a position of trust. In all cases:

- Ensure the immediate safety of the child. The overriding priority in any situation is the immediate safety of the child or young person. Stop other activity and focus on what you are being told, or have just seen. Responding to suspicion of abuse takes immediate priority. Consideration must be given to removing the victim from any potential harm.
- Do not promise confidentiality. Make it clear to the individual that the information must be passed on if they think the young person has been, is being or may be harmed in some way. Explain clearly to the person raising the concern about what you expect will happen next. Confirm that you will only tell those you have to tell to get the issue dealt with. Don't promise to keep information to yourself. All concerns and allegations of abuse must be raised.
- Reassure the child or young person. React calmly: panic may frighten or silence the person. Tell the person they were right to tell you and make it clear that the

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- person themselves is not to blame. Take what is said seriously recognising that there may be difficulties in interpreting what is said.
- Avoid any actions that could harm subsequent investigations, including legal proceedings. Obtain the necessary information needed to make a referral. Keep questions to an absolute minimum to ensure a clear and accurate understanding of what is being said. Only ask questions needed to clarify what you are being told. Do not ask about explicit details – it is up to Children's Services/the Police to investigate fully.
 - In the case of FGM, forced marriage, immediate harm or sexual abuse thought to be within the family do not inform the parents if there will be a follow up referral to social services as evidence may be covered up or lost and this could interfere with any further investigation.
 - Report the concern to your manager. Do not delay in passing on the information and seeking further advice on next steps.
 - Make a record of the incident and action taken. As much as possible, write down the words the child or young person used.
 - In the case of FGM (female genital mutilation) of a person under the age of 18 whether suspected or disclosed that it is imminent or that it has happened to another child under 18, report internally and then call 101 and report directly to the police.

Staff members are encouraged to do the following online training about safeguarding from radicalization, terrorism and extremism:

<https://www.elearning.prevent.homeoffice.gov.uk/>

2.2 Action to be taken where an incident of abuse has or potentially has taken place under The Big House's supervision.

In most cases the same procedure outlined in Section 2.1 will need to be followed. In addition:

- a) As well as establishing initial facts, ensure that both the victim and alleged abuser are kept apart.
- b) In a residential setting give consideration to returning one or both of the individuals to their home if the police are not to be immediately involved. Bearing in mind that under-16s must be accompanied, this may mean bringing the whole group home or the accompanied return of one or both individuals. Ensure that procedures are in place to provide for this eventuality.

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c) Where unprotected sex has occurred there may be an immediate need to seek emergency contraception, and concern regarding sexually transmitted infections. Where this is sought will depend on the circumstances, however contact the Safeguarding Lead (Sara Williams) at The Big House for details of appropriate agencies for use in such circumstances.

2.3 Action to be taken for allegations made against a participant by another young person, where both are members of The Big House.

In most cases the same procedure outlined in Section 2.1 will need to be followed. In addition, where both the alleged perpetrator and victim are involved in the programme The Big House will not automatically cease working with either but will consider the most appropriate way of managing future involvement and support of each individual. This may include referring either party or both on to other organisations.

2.4 Action to be taken where consensual sex has taken place where one or both young people are under age and participants on a Big House course or session.

In most cases the same procedure outlined in Section 2.1 will need to be followed. In addition, where either client is below the age of legal consent it is important to try to ensure there has been no exploitation or coercion involved. Where the relationship is clearly mutual and consensual with both individuals it may be appropriate to encourage the young people to inform their parents/guardian or referral agency.

This is important where staff/volunteers are concerned about any rumours from such an event. Counsel the individuals about the appropriateness and possible consequences of their relationship at The Big House and provide ongoing support.

b) Where one young person is over 16 or where one person could be deemed vulnerable or where there is any concern or doubt about the relationship or where the relationship is abusive, Section 2.1 of this procedure must be followed. Each situation will be considered individually, however it may be necessary to refer the case externally.

2.5 Communication during safeguarding incidents

The following communication routes should be observed whenever possible. The Big House staff will ensure that they communicate with those involved in the management

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of a safeguarding concern (Sara Williams and Maggie Norris), and those who need to be aware of safeguarding concerns raised (The Board of Trustees).

2.6 Reporting Safeguarding Incidents

- Individuals should report incidents to the Safeguarding Lead (Sara Williams) or if the concern is about this individual then incidents should be reported directly to the CEO (Maggie Norris) and if the incident concerns the CEO then the report should be taken directly to Emma Corbett (Trustee Safeguarding Lead). This should be done in a timely manner and at least on the same day.
- The Big House's senior staff will ensure that staff are kept informed about safeguarding incidents which occur within their areas of control, including actions taken.

2.7 Recording Safeguarding Incidents

- All concerns and reported allegations, and action taken must be recorded. Safeguarding concerns should be recorded in line with The Big House's Incident Reporting Procedures and logged on the Lamplight database.

PART 3 SAFEGUARDING VULNERABLE ADULTS

As defined in Section 1.1 a vulnerable adult is a person aged 18 years or over and who may need community care services by reason of mental or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation. Within this context abuse can take the form of physical, sexual, psychological, financial or material abuse, neglect or acts of omission, and discriminatory abuse.

3.1 Procedure for responding to safeguarding concerns relating to vulnerable adults

The principles for staff/volunteers in identifying and responding to incidents of concern in relation to adults are the same as those for children and young people. In most cases the same process and guidance outlined in Section 2.1 will need to be followed.

- Ensure the immediate safety of the vulnerable person.
- Reassure the young person.
- Obtain the necessary information needed to make a referral where appropriate.

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- Report the concern to the Safeguarding Lead (Sara Williams) and CEO (Maggie Norris).
- Make and a detailed written record of the incident and send this to the Safeguarding Lead (Sara Williams) and CEO (Maggie Norris) to be stored on Lamplight, alongside the Safeguarding Lead's record of any action taken.

PART 4 ALLEGATIONS INVOLVING THE BIG HOUSE STAFF AND VOLUNTEERS

Concerns about staff and volunteers must be treated with the same rigour as other Safeguarding concerns. If a concern or allegation of abuse or inappropriate conduct is made against a member of staff or a person in a position of trust, or you have a suspicion regarding a member of staff or volunteer's conduct with regard to children or young people you must contact a senior member of staff immediately (Sara Williams / Maggie Norris / Emma Corbett as appropriate).

4.1 Reporting procedure

The same procedure as outlined in Section 2.1 must be followed. In addition:

- a) Where the allegations are particularly serious or there is no doubt that an offence has been committed the police and/or children's social care will be informed. A strategy for further action will then be agreed before a decision is taken as to notifying the staff member/volunteer.
- b) If the complaint or allegation is such that it is clear that investigations by police and/or enquiries by children's social care are not necessary (or these bodies advise that this is the case) a decision will need to be made as to whether further action is still necessary, in particular whether action is required in line with The Big House's Disciplinary Policy and procedure.

The CEO and Trustees will coordinate decisions and any actions to be taken, including any referral to children's social care services/police and any subsequent actions by The Big House.

The staff member/volunteer will be informed of the allegation and given an opportunity to respond.

The staff member/volunteer may be removed from duties that have direct contact with young people or required to take special leave with pay without prejudice.

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If the person is a member of a union or professional association s/he should be advised to seek support from that organisation at the outset.

External support for the staff member/volunteer will be considered, to include accessing counselling services, where appropriate and should they require it.

c) Where there are clear grounds to believe that the allegations are malicious, an internal investigation will be held within 3 days and referred back to the CEO (Maggie Norris) and Trustees for any further action. If the allegation was made by a child/young person, children's social care may be notified to assess whether the individual is in need of services. If the allegations were from another party disciplinary action may be taken. In serious cases (e.g. where it is believed the allegations were deliberately invented), the police may need to be notified.

4.2 Following an allegation

a) After an allegation or suspicion about a Safeguarding concern during and whilst it is being investigated, there are likely to be strong feelings among staff, clients, and parents and possibly among the wider community, which will need to be addressed. The Big House will give careful thought to the provision of appropriate support to staff and volunteers who might be affected.

b) If an allegation is substantiated and the staff member/volunteer is dismissed (or otherwise barred from working for and with The Big House), the CEO (Maggie Norris) will consult with the local authority designated officer (LADO) to determine whether a referral to the Independent Safeguarding Authority is required. If a referral is appropriate the report should be made within one month. For serious incidents it may also be necessary to notify the Charity Commission.

4.3 Support to deal with the aftermath of a report of abuse

- Consideration will be given on what support may be appropriate for children, young people, parents, staff and volunteers.
- Staff and volunteers will be supported in accessing counselling services, where appropriate.
- Staff accused of misconduct, if permitted to return to work for The Big House will attend a back to work interview in order to address anxieties, re-entry into the workplace and ongoing support in the workplace.

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PART 5 WORKING WITH PARTNER ORGANISATIONS

The Big House is committed to working in partnership with Local Authorities and other agencies. When this involves an agreement for another organisation to provide services on its behalf, The Big House will ensure that the partner organisation has appropriate safeguarding policies in place which will include safeguarding policies and procedures, sound recruitment and selection practices and formal complaints procedures for users.

Where The Big House is working in partnership with other organisations agreement must be reached with regard to the responsibilities, procedures and practices contained in this document. The written contract, agreement or protocol detailing the services to be provided should include the procedure to be followed in the event of concerns about child abuse. The purpose of this is to ensure clarity as to which organisation is responsible for taking action in specific circumstances. Failure to reach agreement, or a situation arising that causes concern with regard to the partner organisations practice may lead to cessation of that partnership.

Where the delivery partner is responsible for taking action, any agreement should stipulate that The Big House must be informed of all incidents.

If a staff member/volunteer becomes aware of allegations of abuse relating to a partner organisation, it should be discussed in the first instance with The Big House's team.

PART 6 SAFEGUARDING & SPECIFIC CHILD PROTECTION TRAINING

a) All staff and volunteers will receive the appropriate level of safeguarding and specific child protection awareness training to ensure the organisation has proper awareness and understanding of child abuse and neglect of children and young people.

b) All staff are required to complete The Big House's safeguarding training and induction processes.

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c) Other appropriate safeguarding and child protection training and instruction for identified staff groups and volunteers will be available. Training will be appropriate to roles and be accompanied by written material that can serve as a reference, where appropriate.

KEY CONTACTS

Designated Safeguarding Lead	Sara Williams	020 7923 9955
Deputy Safeguarding Lead	Maggie Norris	020 7923 9955
Trustee Safeguarding Lead	Emma Corbett	020 7923 9955

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t: 020 7923 9955

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