



Our mission: The provision of leisure opportunities for children and young adults with disabilities.

## Child Protection and Safeguarding Policy

Family Link is committed to Protecting, Safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

<b>Charity</b>	<b>Bromley Family Link</b>
<b>Policy</b>	<b>Child Protection and Safeguarding Policy</b>
<b>Trustee for Safeguarding</b>	<b>Julia James</b>
<b>Designated Safeguarding Lead</b>	<b>Megan Kelleher</b>
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<b>Last updated</b>	<b>5<sup>th</sup> October 2024</b>



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## **1. Introduction**

Our provision has an inclusive approach to safeguarding, which ensures that keeping young people safe is at the heart of everything we do, and underpins all systems, processes and policies. It is important that our values are understood and shared by all young people, staff, parents/carers, trustees and the wider community. Only by working in partnership, can we truly keep young people safe.

## **2. Statutory framework**

There is government guidance set out in [Working Together \(DfE, 2023\)](#) on how agencies must work in partnership to keep young people safe. This guidance places a shared and equal duty on three Safeguarding Partners (the Local Authority, Police and Health) to work together to safeguard and promote the welfare of all young people in their area under multi-agency safeguarding arrangements. These arrangements sit under the Bromley Keeping Children Safe Partnership (BSCP). In Bromley, the statutory partners are, Bromley Police and the NHS. Section 175 of the Education Act 2002 places a statutory responsibility on the trustees to have policies and procedures in place that safeguard and promote the welfare of young people who attend the provision.

In Bromley, all professionals must work in accordance with the [SET Procedures](#). Our provision also works in accordance with the following legislation and guidance (*this is not an exhaustive list*):

[Keeping children safe in education 2024: part one \(publishing.service.gov.uk\)](#)

[Working together to safeguard children 2023 - GOV.UK \(www.gov.uk\)](#)

[Education Act \(2002\)](#)

[Essex Effective Support \(2021\)](#)

[Counter-Terrorism and Security Act \(HMG, 2015\)](#)

[Serious Crime Act 2015 \(Home Office, 2015\)](#)

[Children and Social Work Act \(2017\)](#)



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[Children Missing Education - statutory guidance for local authorities \(2024\)](#)  
[Sexual Offences Act \(2003\)](#)  
[Education \(Pupil Registration\) Regulations 2006](#)  
[Information sharing advice for safeguarding practitioners \(2024\)](#)  
[Data Protection Act \(2018\)](#)  
[What to do if you're worried a child is being abused \(HMG, 2015\)](#)  
[Children Act \(1989\)](#)  
[Children Act \(2004\)](#)  
[Preventing and Tackling Bullying \(DfE, 2017\)](#)  
[Female Genital Mutilation Act 2003 \(S. 74 - Serious Crime Act 2015\)](#)  
[Preventing youth violence and gang involvement \(Home Office, 2015\)](#)  
[Criminal Exploitation of children and vulnerable adult - county lines guidance \(Home Office, 2018\)](#)  
[Teaching on-line safety in schools \(DfE, 2019\)](#)  
[Education Access Team CME / Home Education policy and practice \(ECC, 2018\)](#)  
[Behaviour in Schools \(DfE 2024\)](#)  
[Suspension and permanent exclusion in schools, academies and PRUs, including pupil movement \(DfE 2024\)](#)  
[Searching, screening and confiscation \(DfE 2022\)](#)  
[Let's talk: reducing the risk of suicide \(ESCB 2022\)](#)

### **3. Policy statement**

Our provision has an inclusive approach to safeguarding, which ensures that keeping young people safe is at the heart of everything we do, and underpins all systems, processes and policies. It is important that our values are understood and shared by all young people, staff, parents/carers, trustees and the wider community. Children have the right to be protected from harm and where all staff are vigilance in their approach to safeguarding children. Only by working in partnership, can we truly keep young people safe.

**The purpose of this policy statement is:**

This Child Protection and Safeguarding policy is for all staff, parents, trustees, volunteers and the wider community. It forms part of the safeguarding arrangements for our provision and should be read in conjunction with the following:

- ✧ Keeping Children Safe in Education (DfE, 2024)
- ✧ The Behaviour policy;
- ✧ The Staff Behaviour policy (sometimes called Staff Code of Conduct);



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- ✧ The safeguarding response to children missing from education
- ✧ The role of the designated safeguarding lead (Annex C of KCSIE)

Safeguarding and promoting the welfare of children and adults is defined in Keeping Children Safe in as:

- ✧ Protecting children from maltreatment
- ✧ Preventing impairment of children's mental and physical health or development
- ✧ Ensuring that A young person grows up in circumstances consistent with the provision of safe and effective care
- ✧ Taking action to enable all young people to have the best outcome
- ✧ To protect children and young people who receive Family Link's services. This includes the children, young people and adults who use our services.
- ✧ To provide parents, staff and volunteers with the overarching principles that guide our approach to child protection.

This policy statement applies to anyone working on behalf of Family Link including senior managers, paid staff, volunteers, and sessional workers

#### **We believe that:**

- ✧ Children and young people should never experience abuse of any kind.
- ✧ We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

#### **Equality statement**

#### **We have a commitment to anti-discriminatory practice**

#### **We recognise that:**

- ✧ The welfare of the child and young person is paramount.
- ✧ All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, marriage and civil partnership, pregnancy, maternity have a right to equal protection from all types of harm or abuse.
- ✧ Some children and young people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- ✧ Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.



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**We will seek to keep children and young people safe by:**

- ✧ Valuing, listening to and respecting them
- ✧ Appointing a nominated child protection lead and a deputy child protection lead.
- ✧ Developing child protection and safeguarding policies and procedures which reflect best practice
- ✧ Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- ✧ Creating and maintaining an anti-bully environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ✧ Developing and implementing an effective online safety policy and related procedures
- ✧ Recruiting staff and volunteers safely, ensuring all necessary checks are made
- ✧ Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures
- ✧ Implementing a code of conduct for staff and volunteers
- ✧ Using our procedures to manage any allegations against staff and volunteers appropriately
- ✧ Ensuring that we have effective complaints and whistleblowing measures in place
- ✧ Recording and storing information professionally and securely.
- ✧ Ensuring children are adequately supervised whilst eating.

### **Roles and responsibilities**

All adults working with or on behalf of our young people have a responsibility to protect them and to provide a safe environment in which they can develop and achieve their full potential. However, there are key people within provisions and the Local Authority who have specific responsibilities under child protection procedures. The names of those in our provision with these specific responsibilities (the designated safeguarding lead designated safeguarding lead) are shown on the cover sheet of this document. However, we are clear that safeguarding is everyone's responsibility and that everyone who comes into contact with young people has a role to play.

#### **4.Role and responsibilities of the designated safeguarding lead and deputy**

The designated safeguarding lead at the provision has ultimate lead responsibility for safeguarding and child protection. Their role includes managing young people's protection referrals, working with other agencies, ensuring all staff are appropriately trained and raising awareness of all safeguarding and child protection policies and procedures. They ensure that everyone at the provision (including temporary staff, volunteers and contractors) is aware of these procedures and that they are followed at all times. They act as a source of advice and support for other staff (on child protection matters) and ensure that any referrals to Bromley Children's Social Care (Children



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and Families Hub) are made in a timely way and in accordance with current SET procedures. They work with the local authority and the (BSCP) as required and ensure that information is shared appropriately.

The deputy designated safeguarding lead/leads is/are trained to the same standard as the designated safeguarding lead. If for any reason the designated safeguarding lead is unavailable, the deputy designated safeguarding lead/leads will act in their absence.

### **Definition of safeguarding and child protection**

Safeguarding means protecting a child and young person's health, wellbeing and human rights; enabling them to live free from harm, abuse and neglect. It is an integral part of providing high-quality

### **All staff**

Everyone at our provision has a responsibility to provide a safe environment where our young people can develop. All staff are aware of the types of abuse and safeguarding issues that can put young people at risk of harm, so we are able to identify young people who may be in need of help or protection. We understand that behaviours linked to issues such as drug taking and/or alcohol misuse, missing education and consensual/non-consensual sharing of nudes and semi-nudes images can be signs that young people are at risk. In addition, we recognise that any child may benefit from additional help and all staff members are aware of the local early help process and our role in it.

All staff members are aware of and follow our provisions processes (as set out in this policy) and are aware of how to make a referral to Social Care, if there is a need to do so. Staff understand that, if they have any concerns about a child's welfare, they must act on them immediately and speak with the designated safeguarding lead (or deputy) – we do not assume that others have taken action.

Our staff understand that young people may not always feel able or know how to tell someone that they are being abused, perhaps because they are embarrassed, or they may not always recognise that they are being abused. We recognise there are many factors which may impact on our young people's welfare and safety and understand safeguarding in the wider context (contextual safeguarding). We also understand that abuse, neglect and safeguarding issues are rarely 'stand-alone' events and that, in most cases, multiple issues will overlap.



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Our staff will always reassure children who report abuse / victims of abuse that they are taken seriously and that they will be supported and kept safe. We will never make a young person feel ashamed for reporting abuse, nor make them feel they are causing a problem.

### **Trustees**

The trustees ensure that the policies, procedures and training in our provision are effective and comply with the law at all times. It ensures that all required policies relating to safeguarding are in place, that the young person's protection policy reflects statutory and local guidance and is reviewed at least annually.

The trustee for safeguarding arrangements is named on the front cover of this document. This trustee takes strategic responsibility at the governing body level for safeguarding arrangements in our provision. The trustees ensure there is a named designated safeguarding lead and at least one deputy (also named on the front cover).

The trustees body ensures the provision contributes to inter-agency working, in line with statutory and local guidance. It ensures that information is shared and stored appropriately and in accordance with statutory requirements.

The trustees ensure that all adults in our provision who work with young people undergo safeguarding and child protection training at induction as appropriate and that it is regularly updated. All staff members receive regular safeguarding and child protection updates, at least annually, to provide them with the relevant skills and knowledge to keep our young people safe.

The lead playworkers ensure our young people are aware of safeguarding. We work in accordance with government regulations which encourage subjects of Relationships Education. The governing body and the trustees are responsible for:

- ✧ ensuring we have in place safer recruitment procedures that help to deter, reject or identify people who might abuse children
- ✧ ensuring we meet statutory responsibilities to check adults working with young people and have recruitment and selection procedures in place (see the provision's 'Safer Recruitment' policy for further information) ensuring volunteers are appropriately supervised within the workplace





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## **The Designated Safeguarding Lead (and Deputy / Deputies)**

### **5.Types of abuse / specific safeguarding issues**

Keeping Children Safe in Education describes abuse as ‘a form of maltreatment of a child’. It sets out that:

*“Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children”*

The guidance refers to four main categories of abuse:

**Physical:** a form of abuse causing physical harm to a child – this includes where an adult fabricates or deliberately induces illness in a child

**Emotional:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development

**Sexual:** forcing or enticing a child to take part in sexual activities (through actual physical or online contact)

**Neglect:** the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development

In addition, Annex B of Keeping Children Safe in Education contains important information about specific forms of abuse and safeguarding issues:

### **Child criminal exploitation (CCE) and Child Sexual Exploitation (CSE)**

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person 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 children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.



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Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pick-pocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Child Sexual Exploitation (CSE) is a form of child abuse, which can happen to boys and girls from any background or community. It may occur over time or be a one-off occurrence. In Bromley, the definition of Child Sexual Exploitation (CSE) from the Department of Education (DfE, 2018) has been adopted:

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

It is understood that a significant number of young people who are victims of CSE go missing from home, care and education at some point. Our provision is alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns. The designated safeguarding lead will lead on these issues and work with other agencies as appropriate.

### **Peer on Peer abuse**

Family Link recognises that some children and adults may abuse their peers and any incidents of peer on peer abuse will be managed in the same way as any other child protection concern and follow the same procedures.

Peer on peer abuse can manifest itself in many ways:

- ✧ Bullying (including cyber-bully)
- ✧ Gender-based abuse
- ✧ Prejudiced behaviour
- ✧ Sexually inappropriate behaviour



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We do not tolerate any harmful behaviour and take swift action to intervene. Abuse is abuse and it should never be tolerated or passed off as 'banter' or 'part of growing up'. Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling or otherwise causing harm to another person. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another. Prejudiced behaviour related bullying can be connected to prejudices around belonging, identity, disabilities, special education needs, ethnic, cultural, religious backgrounds, home life and sexual identity.

We recognise that our provision may be the only stable, secure and safe element in the lives of young people at risk of, or who have suffered, harm and trauma. Nevertheless, whilst at our provision, their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other young people. Our provision recognises that some young people may abuse their peers and that this may happen in our provision or outside of it. Any incidents of young person on young person abuse will be managed in the same way as any other child protection concern and we will follow the same procedures. We will seek advice and support from other agencies as necessary and ensure that appropriate agencies are involved when required.

Our provision understands that even though child on child abuse / harmful sexual abuse may not be reported, it is likely that it is occurring, and we are clear there is a zero tolerance approach to inappropriate or abusive behaviour. We understand the barriers which may prevent a young person from reporting abuse and work actively to remove these.

### **Young Person on Young Person Abuse**

Young person on young person abuse can manifest itself in many ways. This may include bullying (including cyber bullying), physical abuse, sexual violence / sexual harassment, 'up-skirting', 'sexting' or initiation / hazing type violence and rituals. We do not tolerate harmful behaviour of any kind in our provision and will take swift action to intervene where this occurs, challenging inappropriate behaviours when they occur – we do not normalise abuse, nor allow a culture where it is tolerated.

### **Contextual safeguarding**

We understand that safeguarding incidents and behaviours can be associated with factors outside our provision. All staff are aware of contextual safeguarding and the fact they should consider whether wider environmental factors present in a child's life are a threat to their safety and / or



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welfare. We always consider relevant information when assessing any risk to a young person and share it with other agencies when appropriate to support better understanding of a young person and their family.

### **Domestic abuse**

Domestic abuse can involve a wide range of behaviours and can include intimate partner violence, abuse by family members, teenage relationship abuse and young person to parent abuse. We understand that anyone can be a victim of domestic abuse, and that it can take place inside or outside of the home.

Our provision recognises that exposure to domestic abuse (either by witnessing or experiencing it) can have a serious, long-term emotional and psychological impact on children. We work with other key partners and we receive / share relevant information where there are concerns that domestic abuse may be an issue for a child or family or be placing a young person at risk of harm.

### **Harmful sexual behaviour**

We understand that a young person's sexual behaviours exist on a continuum, ranging from age-appropriate / developmental to inappropriate / problematic / abusive. We also understand that harmful sexual behaviour and child on child abuse can occur between young people of any age and gender, either in person or online. We recognise that young people who display harmful sexual behaviour may have experienced their own abuse and trauma, and we will support them accordingly.

Our provision has a 'zero-tolerance' approach to harmful sexual behaviour of any kind, and any inappropriate behaviour is challenged and addressed. We work in accordance with all statutory guidance in relation to such behaviours and with other agencies as appropriate.

We seek to teach our pupils about healthy and respectful relationships, boundaries and consent, equality, the law and how to keep themselves safe (on and offline).

### **Mental health**

Positive mental health is the concern of the whole community, and we recognise that provisions play a key part in this. Our provision aims to develop the emotional wellbeing and resilience of all young people and staff, as well as provide specific support for those with additional needs. We



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understand that there are risk factors which increase someone's vulnerability and protective factors that can promote or strengthen resilience. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to counter-balance and promote further growth of resilience.

Our staff are aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. We understand that, where young people have suffered abuse or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Where we have concerns this may impact on mental health, we will seek advice and work with other agencies as appropriate to support a young person and ensure they receive the help they need.

It is vital that we work in partnership with parents/carers to support the wellbeing of our attendees. We expect parents/carers, if they have any concerns about the wellbeing of their young person, to share this with us, so we can ensure that appropriate support and interventions can be identified and implemented.

## **6. Online safety**

We recognise that our young people are growing up in an increasingly complex world, living their lives on and offline. Whilst this presents many positive and exciting opportunities, we recognise it also presents challenges and risks, in the form of:

**content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, suicide, racist or radical and extremist views;

**contact:** being subjected to harmful online interaction with other users; for example peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

**conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying

**commerce:** risks such as online gambling, inappropriate advertising, phishing and / or financial scams

All staff in our provision are aware of the risks to young people online. We understand any young person can be vulnerable online, and that their vulnerability can vary according to age, developmental stage and personal circumstances. We aim to equip all our pupils with the



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knowledge they need to use the internet and technology safely, and we want to work with parents to support them to keep their young people safe online.

### **Partnership with parents/support to families**

- ✧ Parents are normally the first point of contact. We discuss concerns with parents to gain their view of events, unless we feel this may put the child in greater danger.
- ✧ We inform parents when we make a record of concerns in their child's file and that we also make a note of any discussion we have with them regarding a concern.
- ✧ If a suspicion of abuse warrants referral to social care, parents are informed at the same time that the referral will be made, except where the guidance of the Local Safeguarding Partners does not allow this, for example, where it is believed that the child may be placed in greater danger.
- ✧ This will usually be the case where the parent is the likely abuser. In these cases the social workers will inform parents.
- ✧ Contact details for the local National Society for the Prevention of Cruelty to Children (NSPCC) are also kept.

### **Intimate care/safe practices**

The member of staff helping the child must notify another member of staff when they are going alone to assist/change a child, and must ensure another member of staff is in the vicinity and visible or audible. To further protect the privacy and dignity of the child, staff should notify others discreetly that they are taking the child for personal care.

### **Children with SEN or a Disability**

- ✧ Recognised an increased vulnerability of deaf and disabled children because of barriers they may face, especially around communication.
- ✧ Recognition that there may be additional barriers that exist when recognising the signs of abuse and neglect of children who have SEN/D
- ✧ Provide additional safeguarding information specific to a child's disability, such as intimate care and safe touch



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### **Prevention of Radicalisation**

As of July 2015, the [Counter-Terrorism and Security Act \(HMG, 2015\)](#) placed a new duty on schools and other providers. Under section 26 of the Act, schools and other providers are required, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

Channel is a national programme which focuses on providing support at an early stage to people identified as vulnerable to being drawn into terrorism. If a young person on roll at our provision is referred to the Channel Panel, a representative from the provision may be asked to attend the Channel panel to help with an assessment and support plan.

Our provision operates in accordance with local procedures for PREVENT and with other agencies, sharing information and concerns as appropriate. Where we have concerns about extremism or radicalisation, we will seek advice from appropriate agencies and, if necessary, refer to Social Care and/or the Channel Panel.

### **Serious Violence**

All staff are aware of the risk factors and indicators which may signal that young people are at risk from or involved with serious violent crime. These may include increased absence from our provision, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a young person has been approached by, or is involved with, individuals associated with criminal networks or gangs.

### **So-called ‘honour-based violence’ (including Female Genital Mutilation and forced marriage)**

So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. We understand that this form of abuse often involves a wider network of family or community pressure and can include multiple perpetrators.



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*Female Genital Mutilation* (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of child abuse.

As of October 2015, the Serious Crime Act 2015 (Home Office, 2015) introduced a duty on professionals to notify the police of known cases of FGM where it appears to have been carried out on a girl under the age of 18. Our provision operates in accordance with the statutory requirements relating to this issue, and in line with local safeguarding procedures.

A *forced marriage* is one entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. Our staff understand how to report concerns where this may be an issue.

### **7.Young People potentially at risk of greater harm**

We recognise that some young people may potentially be at risk of greater harm and require additional help and support. These may be young people with a Child in Need or Child Protection Plan, those in Care or previously in Care or those requiring mental health support. We work with Social Care and other appropriate agencies to ensure there is a joined-up approach to planning for these young people and that they receive the right help at the right time.

Our provision understands that young people with special educational needs (SEN) and / or disabilities can face additional safeguarding challenges. Barriers can exist when recognising abuse and neglect in this group of young people. These can include:

- ✧ Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability, without further exploration
- ✧ That they may be more prone to peer group isolation than others
- ✧ The potential to be disproportionately impacted by things like bullying, without outwardly showing signs
- ✧ Communication difficulties in overcoming these barriers





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## **Child sexual exploitation (CSE)**

Sexual exploitation affects thousands of children. Hidden from view and going unnoticed, vulnerable young girls and boys are groomed and then abused.

Staff at Family Link are aware of what to look out for:

- ✧ Children receiving unexplained gifts
- ✧ Changes in moods, behaviour or any physical signs such as bruising.
- ✧ Being secretive
- ✧ Lack of interest
- ✧ Exercising caution around older friends

## **8.Procedures for suspicions of abuse**

Our provision works with key local partners to promote the welfare of young people and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of young people are identified and contributing to inter-agency plans which provide additional support (through a Child in Need or a Child Protection plan).

All staff members have a duty to identify and respond to suspected / actual abuse or disclosures of abuse. Any member of staff, volunteer or visitor to the provision who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred, **must** report it immediately to the designated safeguarding lead (or, in their absence, the deputy designated safeguarding lead).

All action is taken in accordance with the following guidance:

- ✧ Bromley Safeguarding Children Board guidelines
- ✧ Keeping Children Safe in Education (DfE, 2024)
- ✧ Working Together to Safeguard Children (DfE, 2023)
- ✧ PREVENT Duty - Counter-Terrorism and Security Act (HMG, 2015)

We acknowledge that abuse of children can take different forms: **physical, emotional, and sexual**, as well as **neglect**.



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When children are suffering from physical, sexual or through changes in their emotional abuse, or may be experiencing neglect, this may be demonstrated through:

- ✧ significant changes in their behaviour
- ✧ deterioration in their general well-being;
- ✧ their comments which may give cause for concern, or the things they say (direct or indirect disclosure)
- ✧ changes in their appearance, their behaviour, or their play;
  
- ✧ unexplained bruising, marks or signs of possible abuse or neglect; and any reason to suspect neglect or abuse outside the setting.
- ✧ We take into account factors affecting parental capacity, such as social exclusion, domestic violence, parents drug or alcohol abuse, mental or physical illness or parent's learning disability.
- ✧ We are aware of other factors that affect children and young people's vulnerability such as, abuse of disabled children; fabricated or induced illness; child abuse linked to beliefs in spirit possession; sexual exploitation of children, such as through internet abuse; and Female Genital Mutilation; that may affect, or may have affected, children and young people using our provision.
- ✧ We also make ourselves aware that some children and young people are affected by gang activity, by complex, multiple or organised abuse, through forced marriage or honour based violence or may be victims of child trafficking. While this may be less likely to affect young children and young people in our care, we may become aware of any of these factors affecting older children and young people who we may come into contact with.
- ✧ Where we believe that a child in our care or that is known to us may be affected by any of these factors, we follow the procedures below for reporting child protection concerns.
- ✧ Where such evidence is apparent, the child's key person makes a dated record of the details of the concern and discusses what to do with the setting leader or manager who is acting as the 'designated person'. The information is stored securely.
- ✧ We refer concerns to the local authority children's social care department and co-operate fully in any subsequent investigation. N.B. In some cases this may mean the police or another agency identified by the Local Safeguarding Partners.
- ✧ We take care not to influence the outcome either through the way we speak to children and young people or by asking questions of children and young people.
- ✧ We take account of the need to protect young people aged 16-25 as defined by the Children Act 1989. This may include students or school children on work placement, young employees or young parents. Where abuse is suspected we follow the procedure for reporting any other child protection concerns. The views of the young person will always be taken into account, but the setting may override the young person's refusal to consent to share information if it feels that it is necessary to prevent a crime from being committed or intervene where one may have been, or to prevent harm to a child or adult. Sharing



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confidential information without consent is done only where not sharing it could be worse than the outcome of having shared it.

Any staff member or visitor to the provision must refer any concerns to the designated safeguarding lead or deputy designated safeguarding lead. Where there is risk of immediate harm, concerns will be referred by telephone to the Children and Families Hub and / or the Police. Less urgent concerns or requests for support will be sent to the Child and Families Hub via Bromley Safeguarding Children Partnership (BSCP). The provision. so where it is felt that to do so could place a young person at greater risk of harm or impede a criminal investigation. If it is necessary for another agency to meet with a young person in the provision, we will always seek to inform parents or carers, unless we are advised not to by that agency. On occasions, it may be necessary to consult with the Children and Families who may also seek advice from Social Care or another appropriate agency about a concern if we are unsure how to respond to it. Wherever possible, we will share any safeguarding concerns, or an intention to refer a young person to Children's Social Care or the MASH Team, with parents or carers. However, we will not do so where it is felt that to do so could place a young person at greater risk of harm or impede a criminal investigation. If it is necessary for another agency to meet with a young person in our provision, we will always seek to inform parents or carers, unless we are advised not to by that agency. On occasions, it may be necessary to consult with the Children's and Families Hub or MASH and / or Bromley Police for advice on when to share information with parents / carers.

All staff understand that, if they continue to have concerns about a young person, or feel a concern is not being addressed or does not appear to be improving, they should press for reconsideration of the case with the designated safeguarding lead.

If, for any reason, the designated safeguarding lead (or deputy) is not immediately available, this will not delay any appropriate action being taken. Safeguarding contact details are displayed in the provision to ensure that all staff members have access to urgent safeguarding support, should it be required. Any individual may refer to Social Care or the MASH team where there is suspected or actual risk of harm to a young person.

When new staff, volunteers or regular visitors join our provision they are informed of the safeguarding arrangements in place, the name of the designated safeguarding lead (and deputy/deputies) and how to share concerns with them.



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## **9. Training**

In line with statutory requirements, the designated safeguarding lead (and deputy/deputies) undertake Level 3 child protection training at least every two years. The Trustees, all staff members and governors receive appropriate child protection training which is regularly updated and in line with advice from Bromley Safeguarding Children Partnership (BSCP). In addition, all staff members and other adults working with young people in our provision receive safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard young people effectively. Records of any child protection training undertaken are kept for all staff and governors.

The provision ensures that the designated safeguarding lead (and deputy) also undertakes training in inter-agency working and other matters as appropriate.

## **10. Information sharing and confidentiality**

Sharing information is a key part of safeguarding work and decisions about how much information to share, with whom and when, can have a profound impact on a young person's life.

Where there are concerns about the safety of a young person, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information, where the failure to do so would result in a young person or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life, would not prevent sharing information where there are real safeguarding concerns. Fears about sharing information cannot (and will not) stand in the way of the need to safeguard and promote the welfare of young people at risk of abuse or neglect related to a young person's protection are recorded in our Records of Processing Activity and are regularly reviewed for young person protection purposes.

A member of staff will never guarantee confidentiality to anyone (including parents/carers or pupils) about a safeguarding concern, nor promise to keep a secret. In accordance with statutory requirements, where there is a young person's protection concern, this must be reported to the designated safeguarding lead and may require further referral to and subsequent investigation by appropriate authorities.



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Information on individual young person's protection cases may be shared by the designated safeguarding lead (or deputy) with other relevant staff members. This will be on a 'need to know' basis only and where it is in the young person's best interests to do so.

Information sharing can help to ensure that a young person receives the right help at the right time and can prevent a concern from becoming more serious and difficult to address.

### **11. Young Person's protection records**

Well-kept records are essential to good child protection practice. Our provision is clear about the need to record any concern held about young people within our provision and when these records should be shared with other agencies.

Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse will record it as soon as possible, noting what was said or seen (if appropriate, using a body map to record), giving the date, time and location. All records will be dated and signed and will include the action taken. This is then presented to the designated safeguarding lead (or deputy), who will decide on appropriate action and record this accordingly.

Any records relating to young person's protection are kept on an individual young person's protection file for that young person under the Child Protection Management System on Google Classrooms, this can only be accessed by the safeguarding team and play leaders. All young person's protection records are stored securely and confidentially and will be retained for 25 years after the pupil's date of birth.

### **12. Inter agency working**

It is the responsibility of the designated safeguarding lead to ensure our provision is represented at, and that a report is submitted to, any statutory meeting called for young people on roll or previously known to them. Where possible and appropriate, any report will be shared in advance with the parent(s) / carer(s). The member of staff attending the meeting will be fully briefed on any issues or concerns the provision has and be prepared to contribute to the discussions.

### **13. Allegations about members of the workforce**

All staff members are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are outlined in the Staff Behaviour policy / Code of Conduct. Our provision works in accordance with statutory guidance and the SET procedures (BSCP)



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in respect of allegations against an adult working with a young person (in a paid or voluntary capacity).

The provision has processes in place for reporting any concerns about a member of staff (or any adult working with young people). Any concerns about the conduct of a member of staff must be referred to the Play Leader or the Project Manager, as they have responsibility for managing employment issues. Where the concern involves the Play Leader or the Project Manager, it should be reported directly to the Trustees.

**Policy approved and adopted by the Family Link Board of Trustees**

**On the: 5<sup>th</sup> October 2024**

**Reviewed: 5<sup>th</sup> October 2024 by Trustee - Julia James**

**Current Play Leaders – Kenzie/Jane/Renee/Megan**

**Current Safeguarding Trustee – Julia James**

**Current Safeguarding Lead - Megan Kelleher**

**Policy due for review: 5<sup>th</sup> October 2025**