



# **Safeguarding Children and Young People Policy**

**Version No: 3**

Policy Owner: Designated Safeguarding Lead (Centre Manager)

Review Date: 15 May 2024

Date Approved by the Board of Trustees: 21 May 2024

Next Review Date: May 2025

# Contents

<b>Policy</b>	<b>Page</b>
1. Introduction	3
2. Policy Statement	4
3. Purpose and scope	5
4. Principles	6
5. Policy implementation	8
6. Training and Supervision	10
7. Role and responsibilities	12
8. Safe recruitment	14
9. Events and Activities	16
10. Online Safety	17
11. Record Keeping and Information Sharing	18
12. Confidentiality and GDPR	19
13. Code of Safe Conduct	19
14. Safeguarding Children and Young People Procedures	21
15. Multi-agency Working	21
16. Monitoring and Review	21
<b>Appendices</b>	
Appendix 1 FCDC Safeguarding Role Descriptions	22
Appendix 2 Types and Signs of Abuse	24
Appendix 3 Key Definitions and Terminology	34
Appendix 4 Safeguarding Children Legislation	35
<b>Please note:</b>	
This Policy forms part of FCDC's whole organisation Safeguarding Framework. It should be read and complied with in conjunction with FCDC Safeguarding Standards, Safeguarding Children and Young People Procedures, Adult Safeguarding Policy/Procedures, Digital Safeguarding Policy, Safe Recruitment Policy, Codes of Conduct and other relevant organisation policies/procedures.	

## 1. Introduction

The Family Centre Deaf Children (FCDC) is committed to proactively safeguarding children, young people, adults at risk and its workforce. The safety and welfare of everyone affected by our services and activities, especially children, is our first priority and at the heart of everything we do.

The Children Act 2004 places a duty on all organisations to safeguard and promote the wellbeing of children. This includes the need to ensure that all adults who work with or on behalf of children in organisations are competent, confident and safe to do so.

FCDC's safeguarding standards, policies, procedures and guidance outline how we will fulfil our duty of care to safeguard the children and young people we work with and those that work on our behalf.

This Policy sets out how FCDC safeguards and promotes the welfare of children and young people who access our services and come into contact with FCDC, in accordance with applicable laws, regulations and guidance, including (but not limited to):

- [Working Together to Safeguard Children \(2023\)](#)
- [Charity Commission's guidance: 'Safeguarding and protecting people for charities and trustees' \(June 2022\).](#)
- [Bristol Safeguarding Partnership Procedures](#)
- [Bath & North East Somerset Community Safety & Safeguarding Partnership Procedures](#)
- [South Gloucestershire Children's Partnership Procedures](#)

This Policy explains what we expect of our staff, volunteers, contracted professionals, sessional workers, partner organisations and service users.

FCDC's Safeguarding Children and Young People Procedures, which should also be read and complied with, set out the procedures that everyone should follow if they have a concern about a child/young person or a person's behaviour.

All staff, volunteers (including Trustees), contracted professionals, sessional workers and any other person working on behalf of the charity will receive a copy of this Policy and FCDC Safeguarding Children and Young People Procedures, which they must sign to confirm that they have read and agree to abide by. It is very important that you follow this Policy and FCDC safeguarding procedures. If you have a safeguarding concern, **you must report it.**

If you have any questions or concerns about this Policy or safeguarding in general, or if you are unsure whether your concern or question comes under this Policy, please contact FCDC's Designated Safeguarding Lead:

**Helen Davies - Designated Safeguarding Lead (Family Centre Manager)**

Tel: 0117 9030366 / Mobile: 07810 533269

Email: [helen@fcdc.org.uk](mailto:helen@fcdc.org.uk)

This Policy will be reviewed annually and is available on FCDC's shared drive and website [www.fcdc.org.uk](http://www.fcdc.org.uk).

## 2. Policy Statement

FCDC believes that the welfare of children is paramount and that every child and young person has the right to live free from abuse, exploitation, harassment, fear or neglect, regardless of age, ability or disability, sex, gender identity, race, religion, ethnic origin, sexual orientation or gender status.

FCDC follows the principle that **safeguarding is everybody's responsibility** and is committed to preventing abuse and neglect through safeguarding the welfare of all children and young people involved in our work or with whom we may have contact in the course of our work.

FCDC is committed to:

- Safeguarding children and young people in line with national legislation and relevant national and local authority guidelines.
- Creating a safe, positive environment and an open, listening and learning culture where people feel able to share concerns without fear of retribution.
- Making sure our services and activities are delivered in a way which keeps all children and young people safe.
- Best practice in safeguarding and to uphold the rights of all children and young people to live free from harm, abuse and neglect.
- Creating a culture of early intervention and zero-tolerance of abuse and harm, including bullying and harassment. This requires our workforce to:
  - recognise children and young people who may be at risk and the circumstances which may increase risk.
  - know what child abuse is and how child abuse and neglect manifests itself.
  - be willing and able to report all safeguarding concerns to the appropriate authorities, which extends to recognising and reporting harm experienced anywhere, including within FCDC's activities and services, in the community, in the person's own home and in care settings.

### **Safeguarding children and young people with disabilities**

FCDC recognises that any child with a disability is by definition a 'child in need' under s17 of the Children Act 1989 and that disabled children are more vulnerable to significant harm through physical, sexual, emotional abuse and/or neglect than children who do not have a disability. The presence of multiple disabilities increases the risk of abuse and neglect.

At FCDC, safeguards for d/Deaf and disabled children are essentially the same as hearing and non-disabled children. However, particular attention will be paid to promoting a high level of awareness of the risks of harm, high standards of practice, and awareness of barriers to communication, which can make it difficult for d/Deaf/disabled children to tell others what is happening.

Where there are concerns about the welfare of a child who has a disability, they should be acted upon in accordance with the guidance, in the same way as with any other child.

This policy reflects that additional barriers can exist when recognising abuse and neglect, which can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s deafness/hearing loss/disability without further exploration.
- Being prone to more peer group isolation than other children.
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

### **3. Purpose and scope**

#### **3.1 Policy Aim**

The aim of this policy is to establish a framework for all staff, volunteers and Trustees that clarifies our expectations and seeks to ensure that we undertake our responsibilities with regard to the safeguarding and protection of all children and that we respond to concerns appropriately and promptly.

#### **This policy explains our:**

- Commitment to safeguarding children and young people
- Safeguarding responsibilities
- Safe recruitment procedures and supervision of colleagues and volunteers
- Safeguarding training requirements
- Responsibilities when delivering activities/services to children and young people
- Reporting processes
- Approach to collaborative working

#### **3.2 Purpose**

According to National Deaf Children’s Society, NSPCC and Royal Association for Deaf People data, d/Deaf children are particularly vulnerable to abuse and neglect. They are 3.4 times more likely to experience abuse and more likely to experience bullying and intimidation compared to hearing children.

In addition, recent research indicates d/Deaf children are also more likely to be exposed to violence at home and in school and may experience domestic violence at an earlier age<sup>1</sup>.

This research also found that 1 in 3 of the deaf girls and boys sampled had experienced sexual abuse involving sexual intercourse and 45% had had unwanted sexual experiences.

Furthermore, case reviews<sup>2</sup> also show that professionals don’t always recognise or understand the signs that d/Deaf children and children who have disabilities are experiencing abuse, which can result in safeguarding concerns being missed.

For these reasons, FCDC recognises that we have a particularly important role to play in making sure that the children and young people we support are safeguarded from harm.

#### The purpose of the policy is to:

- Protect children and young people who use our services.
- Provide information on what is defined as abuse, the signs that can suggest abuse and the actions that are required to be taken.

---

<sup>1</sup> [What is the prevalence of abuse in the deaf/hard of hearing population? \(Wakeland et al., 2018\)](#)

<sup>2</sup> [d/Deaf children and children who have disabilities: learning from case reviews \(NSPCC, 2024\)](#)

- Provide links to information which support this policy.

**This policy is to make sure children and young people are safeguarded by:**

- Having clear policies and procedures accessible to deaf and deafblind colleagues (including BSL translations)
- Adopting safe recruitment practices
- Colleagues being regularly and effectively supervised and safeguarding concerns addressed early
- Adopting a proactive approach to safeguarding
- Colleagues receiving appropriate safeguarding and Prevent Duty training (refreshed annually)
- The reinforcement of training/knowledge checking through team meetings and supervisions
- Making sure colleagues working with children have the skills, experience, support and resources to carry out their role
- Creating a culture of safety, equality and protection
- Supporting effective information sharing
- Making sure events involving children are risk assessed and well supervised
- Ensuring compliance with the core principles of the General Data Protection Regulations
- Reviewing our policies and procedures annually
- Ensuring that colleagues are kept up to date with any changes in legislation and that FCDC services operate in line with the legal framework for safeguarding

### **3.3 Scope**

In this policy, we use the term '[child](#)' to mean any individual under the age of 18 years old, including unborn babies. The term 'colleagues', in the context of this policy, is used to mean all paid staff (including contracted professionals and sessional workers) and unpaid volunteers unless otherwise stated.

This policy and associated procedures apply to all individuals involved in FCDC's services and activities, including:

- Trustees
- Staff
- Sessional workers and contracted professionals
- Volunteers
- Family Centre Members and other service users

We also expect our partners partner organisations, suppliers and contractors,) to adopt and demonstrate their commitment to the safeguarding principles and practices as set out in this policy.

## **4. Principles**

FCDC's safeguarding approach and practices are based on the following key principles:

- The welfare of the child and young person is paramount.

- Safeguarding is everyone's responsibility and everyone must play their full part in safeguarding children and young people.
- All children and young people have the right to equal protection from all forms of abuse, neglect and harm, regardless of their age, disability, gender, gender identity, cultural background, racial heritage, religious belief or lack thereof, sexual orientation, political, socio-economic or immigration status)
- Children, young people and their families/carers should be seen as key partners in safeguarding and be at the centre of all decision-making, wherever possible.
- Everyone must contribute to a safeguarding culture where people are listened to and where allegations, concerns or views and wishes are taken seriously.
- All partners involved with FCDC must adhere to the highest of safeguarding standards and practice and adhere to FCDC's safeguarding framework.

### **How we fulfil our principles**

FCDC safeguard and promote the welfare of children and young people by embedding safe practice. We do this by taking the following safeguarding approaches:

- We take a zero-tolerance approach to all forms of abuse, harassment and bullying.
- We appoint a designated lead officer who is responsible for the safeguarding of children and child protection and ensure that their contact details are well publicised to all.
- We appoint a designated lead trustee for safeguarding.
- We have a safeguarding framework and appropriate standards in place that are based on best practice and regularly reviewed.
- We value, listen and respect everyone equally.
- We create and maintain an anti-bullying, harassment and inclusive environment which is supported by our policies and procedures.
- We have codes of conduct in place for our staff, volunteers and service users, including children and young people.
- We set clear standards, expectations and procedures for the reporting and sharing of safeguarding concerns and for managing any allegations.
- We record, store and use information professionally and securely, in line with UK data protection legislation and guidance.
- We make sure our service users and their families know who to speak to if they have a concern.
- We share relevant information with external agencies, when appropriate to do so and in line with our safeguarding policies and procedures.
- We follow best practice safeguarding procedures to manage any low level concerns or allegations about staff and volunteers promptly and appropriately.
- We have effective whistleblowing and child-friendly complaints policies in place which are regularly reviewed and easily found.
- We follow legislative and regulatory guidance for the health and safety of our service users, staff and volunteers.

- We keep our policies and procedures under a cycle of regular review and promote an organisation culture of learning, continuous improvement and safeguarding best practice
- We involve key stakeholders in the development and review of our safeguarding standards, policies and procedures.

## **5. Policy Implementation**

FCDC operate a child-centred, collaborative and coordinated approach to safeguarding children and young people. We will work with children, parents/carers, professionals, external agencies and the wider community to ensure the rights and safety of children are paramount and to give the very best start in life to all children.

FCDC is committed to developing and maintaining the charity's capacity and capability to implement this policy and associated safeguarding procedures. In order to do so, the following safeguarding measures will be in place:

- A clear line of accountability within the organisation for the safety and welfare of all adults.
- A clear set of safeguarding standards that align to national NSPCC safeguarding standards
- Access to professional specialist safeguarding guidance and legal advice
- Regular management reports to the Board of Trustees, detailing how risks to child safeguarding is being addressed and how any reports or concerns raised have been addressed.
- Appropriate safeguarding procedures that deal effectively with any concerns of abuse or neglect, including those caused through poor practice.
- Designated FCDC Safeguarding Lead and Trustee for Safeguarding (see Appendix 1).
- A delegated Safeguarding Lead for events/trips/camps/ competitions.
- Arrangements to work effectively with other relevant organisations to safeguard and promote the welfare of adults, including arrangements for sharing information.
- Codes of conduct for Board of Trustee members, staff, sessional workers, volunteers and Family Centre Members and other relevant individuals that specify a zero tolerance of abuse in any form, including bullying, harassment, exploitation and abuse of power.
- Risk assessments that specifically include the safeguarding of children and young people.
- Appropriate budget allocation to support the implementation of this policy, best practice, workforce development and continuous improvement in safeguarding at FCDC
- Additional FCDC policies are in place that support this policy, including (but not limited to):
  - Safeguarding Adults
  - Disclosure and Barring Checks
  - Anti-bullying and harassment
  - Health and Safety
  - Equality, diversity and inclusion
  - Safe activities risk assessments
  - Codes of Conduct (Staff, Volunteers, Family Centre Members/Service Users, Parents/Carers/Family Members)
  - Digital safeguarding



- Discipline and grievance
- Concerns, Complaints and Compliments
- Whistleblowing
- Data Protection, Information Sharing and Management

**To implement this policy, FCDC will make sure that:**

- Everyone involved with FCDC is aware of our safeguarding policies/procedures and knows what to do and who to contact if they have a concern relating to the welfare or wellbeing of a child or young person.
- Any concern that a child or young person is not safe is taken seriously, responded to promptly, and followed up in line with FCDC's Safeguarding Children and Young People Policy and Procedures.
- The well-being of those at risk of harm will be put first and the child/young person is actively supported to communicate their views and the outcomes they want to achieve. Those views and wishes will be respected and supported unless there are overriding reasons not to (see FCDC Safeguarding Children and Young People Procedures for more information).
- Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm.
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored in line with our Data Protection Policy and Procedures and Information Management Policy and Procedures.
- FCDC acts in accordance with best practice advice and guidance. For example: from National Governing Bodies, Local Safeguarding Boards/Partnerships and safeguarding specialist organisations e.g. Keeping Bristol Safe Partnership, NSPCC and Ann Craft Trust.
- FCDC will cooperate with the Police and relevant Local Authorities in taking action to safeguard a child or young person.
- All Trustees, staff, contracted professionals (e.g. sessional workers, counsellors and play therapists) and volunteers understand their role and responsibility for safeguarding children/young people and have completed and are up to date with safeguarding training and learning opportunities appropriate to their role.
- FCDC uses safe recruitment practices and continually assesses the suitability of staff and volunteers to prevent the employment/deployment of unsuitable individuals in this organisation and within the local deaf community. (See FCDC's Safer Recruitment Policy for more information).
- FCDC shares information about anyone found to be a risk to children and young people with the appropriate bodies. For example: Disclosure and Barring Service, Children's Services, Police, Local Authority/Social Services.
- When planning our services, activities and events, FCDC trained personnel will carry out an assessment of, and risk to, the safety of all children/young people and will designate a person to be in attendance as a safeguarding lead at all FCDC events.
- Actions taken under this policy are reviewed by the Board of Trustees and senior managers on an annual basis.

- This policy, together with other related FCDC policies, including our Safeguarding Adults Policy and Procedures, are reviewed on an annual basis and whenever there are changes in relevant legislation and/or government/Local Safeguarding Boards guidance or as a result of any other significant change or event.

**Where abuse is suspected, FCDC will provide a service which is:**

**Prompt**

In situations where there is any doubt about the child or young person immediate health, emotional wellbeing, mental health and safety.

**Sensitive**

To children and young people and their parents and families.

**Effective**

In reporting, communicating and providing solutions which aim to prevent the risk of further abuse and the abuse recurring, working within a strengthening families multi-agency framework.

**Balanced**

Out staff and volunteers must exercise their responsibilities and duties appropriately, avoiding unwarranted intervention into family's lives.

**Aware**

Does not discriminate against a child/young person or family member because of their religion, cultural beliefs, age, disability, gender, race, or sexuality.

We will support children, young people and their families to have access to relevant sources of information and help such as '[Abuse is Wrong](#)' and '[What to do if you are worried about a child](#)' guidance, a child-friendly complaints policy and ensure they know who to contact at FCDC if they have a safeguarding concern.

**5.1 Partners and joint working**

From time to time, FCDC may work jointly with other organisations, agencies and contracted professionals to deliver the charity's activities, events or services.

When setting up joint working arrangements, FCDC will ensure the safeguarding policies and procedures of other parties and external agencies are fit for purpose. This may involve a written agreement that sets out all parties' responsibilities, including who will be the lead partner for safeguarding.

**6. Training and Supervision**

**6.1 Training**

All staff and volunteers will receive safeguarding training and support relevant to their role. The relevant level of training must be completed within the probation period and renewed at least every three years, or sooner, where need is identified by FCDC.

All colleagues, regardless of their role, will undertake introductory level 1 online safeguarding training every year as a refresher (adults and children modules).

All colleagues and volunteers, regardless of whether or not their role includes client-facing work must be informed of the following as part of their induction:

- Where to find FCDC's safeguarding policies, procedures and Codes of Conduct

- A summary of the different types of abuse, neglect and signs/indicators of abuse and neglect
- What to do if they are concerned that a child is being harmed or radicalised
- What to do if they are worried about the behaviour of a member of FCDC staff, contractor or volunteer
- What to do if nobody is listening to concerns that they raise; escalation process and Whistleblowing Policy

FCDC will ensure colleagues receive this information as part of their initial job or volunteer role induction and before they begin delivering services. All colleagues will sign the induction confirmation sheet to confirm that they have been made fully aware of, and understand the contents of, FCDC's safeguarding policies and procedures.

All colleagues, regardless of their role, will undertake accredited NSPCC online safeguarding training at an appropriate level every year as a refresher (children and adults modules).

All colleagues working with children and young people will undertake Home Office Prevent training (online).

All colleagues working directly with children must attend more in-depth training (minimum Level 2 children's safeguarding) within the first six months of starting their role. This training will be delivered by a provider approved by the safeguarding lead and will usually be the local authority where the colleague is based and will cover:

- An in-depth look at the different types of abuse, signs and symptoms
- Colleagues' responsibilities under Prevent Duty guidance
- Roles and responsibilities
- The local safeguarding partners and associated local authority reporting processes

This training will take place every two years and must be refreshed annually through online core training. Internal refresher training will be provided more regularly through team meetings.

FCDC's Designated Safeguarding Trustee (DST) will work closely with the Board of Trustees to ensure they have the required knowledge, skills and experience to undertake an effective leadership role in the context of safeguarding. They will undertake the required safeguarding management/lead training every two years, taking refresher courses in between.

### [Prevent Training](#)

Under our duty to have due regard for the need to prevent people from being drawn into terrorism, FCDC recognises it is important for colleagues to understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it. *The free Home Office Prevent Duty Training* ensures that all colleagues are aware of what is meant by the term "extremism" and the relationship between extremism and terrorism. This will be further discussed and reinforced through training, team meetings and when risk is identified.

<https://www.gov.uk/guidance/prevent-duty-training>

## **6.2 Staff and Volunteer Supervision**

All staff, contracted professionals and volunteers must receive regular supervision in line with FCDC's supervision and support policy. One to one or peer supervision sessions can be used to provide updates to colleagues who have reported safeguarding concerns and to check knowledge and assess training needs. It is also an opportunity to provide updates in relation to legislation/policy changes and ensuring internal procedures are understood.

Supervision meetings must take place every 4-6 weeks. At each supervision meeting, colleagues are required to make a self-declaration that nothing has changed in their personal circumstances that might call into question their suitability to work with children, young people or adults at risk.

Any safeguarding concerns about children must be reported immediately and any disclosures should not wait until supervision. Supervision will include safeguarding and safe practice as a standard agenda item in order to ensure issues or concerns are identified as soon as possible, actioned and monitored.

The DSL will also meet monthly with the Chair of the charity (Designated Safeguarding Trustee) for supervision. The DSL

FCDC service users may also be required to attend safeguarding training and informal supervision for certain roles, such as FCDC Young Leaders.

## **6.3 Continuous Improvement**

FCDC acknowledges its responsibility to keep up to date with any changes in legislation and safeguarding best practice. It is vitally important that we continually review our safeguarding practices in line with statutory guidance to fulfil the legal and regulatory requirements associated with our organisation's activities. Where there are updates in safeguarding legislation and best practice guidance, the Designated Safeguarding Lead will provide safeguarding briefing updates to colleagues at team meetings as well as preparing reports for the board.

## **7. Roles and Responsibilities**

Safeguarding is everyone's responsibility at FCDC. However, some personnel at FCDC have additional safeguarding duties and responsibilities.

### **7.1 Board of Trustees**

The Board of Trustees hold organisation accountability for safeguarding at FCDC.

### **7.2 Designated Safeguarding Trustee and Designated Safeguarding Lead**

The Designated Safeguarding Trustee (DST) makes strategic decisions and keeps the Board of Trustees updated on safeguarding matters.

In order to lead the safeguarding culture and be appraised of operational issues and their strategic implications, the Chair receives regular safeguarding updates from the Designated Safeguarding Lead (DSL).

The DSL and Chair will ensure that a single central register is held and maintained which ensures that:

- all criminal record checks for staff and volunteers are up to date
- all staff and volunteers complete safeguarding training at a level which is appropriate to the their roles.

The DSL must make sure staff and volunteers:

- are recruited in line with safer recruitment measures
- have a job description which clearly articulates their responsibilities and contribution toward safeguarding
- receive appropriate training and support for their role, including safeguarding
- follow FCDC's Codes of Conduct, policies and procedures at all times

Role descriptions for the DSL and DST roles at FCDC are detailed in [Appendix 1](#) of this policy.

### **7.3 Line Managers**

Managers across the charity will:

- Act as a role model to staff, volunteers, children, young people and other stakeholders by promoting a safeguarding culture.
- Monitor the implementation of this policy and report any concerns to the DSL
- Ensure there is a culture of openness, where everyone feels able to speak up and voice concerns.
- Work with the charity's DSL in line with data protection protocols to keep records of concerns raised against a member of staff or volunteer on their personnel file.
- Ensure all staff and volunteers have had appropriate DBS checks and attend required safeguarding training within their probation period and that this is refreshed in accordance with this policy.
- Ensure that any concerns or allegations are promptly investigated and reported in line with this policy and procedures.

### **7.4 All Staff and Volunteers**

All staff (including contracted professionals, sessional workers and temporary staff), and volunteers have a responsibility for children/young people who access FCDC services and other children and young people who may come into contact with FCDC through our activities.

#### **All staff and volunteers commit to:**

- Treating children and young people with respect and dignity.
- Listening to, and taking seriously, any concerns raised by a child or young person.
- Valuing each individual.
- Using appropriate language and behaviour at all times

#### **All staff and volunteers must:**

- Report any incident, concern, allegation or disclosure without delay using FCDC's report form and safeguarding procedures as detailed in this policy's procedures.
- Report any concerns about the behaviour of staff, volunteers, contractors, service users or others towards children and young people in line with FCDC safeguarding procedures.
- Complete training and update DBS/criminal record checks as and when required.

- Ensure they are familiar, up to date and comply with FCDC policies, procedures and codes of conduct and follow these at all times.

Where safeguarding issues are raised by an external agency directly to an FCDC staff member or volunteer, that staff member or volunteer must report the issues raised immediately to FCDC's Designated Safeguarding Lead or at the earliest opportunity.

**All staff and volunteers should:**

- Be able to recognise signs of abuse and identify children who may benefit from early help.
- Be aware of safeguarding issues that can put children and young people at risk of harm.
- Have a responsibility to provide a safe environment in which children can thrive and learn.
- Follow the safeguarding referral processes of the organisation.
- Be aware of systems which support safeguarding, which should be explained as part of their induction.
- Know what to do if a child tells them he/she is being abused or neglected.
- Never promise a child that they will not tell anyone about a report of abuse, as this may not be in the best interest of the child.

Failure to respond to or report safeguarding disclosures and concerns in accordance with FCDC's safeguarding policy and procedures may result in staff disciplinary action being taken and/or the termination of:

- Employment contracts (in the case of gross misconduct)
- Volunteer agreements
- FCDC contracts for professional services

**8. Safe Recruitment**

FCDC has a safe recruitment commitment that is embedded into our recruitment and selection practices. We expect all employees and volunteers to share our commitment to safeguarding and ensuring the welfare of children, young people and adults who are at risk.

To ensure recruitment complies with FCDC's safeguarding policies, all applicants for both paid and unpaid work at FCDC must:

- Complete an application form detailing full work/life history (any time gaps must be addressed through the interview process)
- Complete a 'self-disclosure' with details of any past criminal record
- Have references checked from their most recent employer and/or from relevant former employers (especially where a gap in an applicant's work history exists)
- Successfully complete a probationary period.

The suitability of all prospective employees or volunteers will be assessed during the recruitment process in line with our commitment.

FCDC will implement robust recruitment and selection procedures, deliver training and supervision, promote safe working practices, and work within the law.

All staff and volunteers employed by FCDC, whether based in our offices, home-based or located at external premises within the community, will be subject to a criminal record check

through the Disclosure & Barring Service (DBS) prior to starting work. This is in addition to references and interview information for working with children. Due to the sensitive nature of our work, a DBS Enhanced Certificate will be required for all staff and volunteers.

A copy of this Safeguarding Policy will be given to each staff member and new volunteer during their induction process. They will be asked to sign it and hand it back to their manager, once they have read and understood the policy.

All staff and volunteers are required to attend child protection / safeguarding training as soon as possible after starting work with FCDC. All staff and volunteers will also receive yearly refresher briefings.

All personnel will be required to complete external specialist training on safeguarding before working with children or young people at a level appropriate to their role. For example: NSPCC and Keeping Bristol Safe Partnership accredited courses.

We are committed to the NSPCC Safeguarding Standards and refer to these standards as a source of specialist information and resources.

#### [Single Central Record](#)

A single central record will be kept for all personnel at FCDC. Stored confidentially and password-protected, each individual personnel file will record that the following checks have been carried out:

- An identity check
- A barred list check
- An enhanced DBS
- Checks on those who have lived outside the UK
- Professional and academic qualifications check (relevant to the role)
- A right to work check

This recruitment and selection data will be logged and stored securely in HR restricted-access files on FCDC's CRM system and treated as confidential unless there is a legal or statutory requirement for FCDC to share this information.

It is important to recognise that a DBS check only tells us that a person does not have a criminal record at the time the check was done. It does not mean that they are not abusers. For this reason, when recruiting staff and volunteers who will work directly with children, FCDC's safe recruitment policy must be followed.

Additionally, and in compliance with FCDC's Disclosure and Barring Checks Policy and Procedures; every colleague is required to inform their line manager immediately if they have been involved in any police or court proceedings which have resulted in any kind of sentence, police caution, probation or suspension. The person's suitability for their role will be re-assessed at this stage.

Colleagues working directly with children will also be required to shadow existing experienced colleagues until such time as they are assessed to be competent by the relevant line manager.

Please read FCDC's Safer Recruitment Policy for further information.



## 9. FCDC Events and Activities

All FCDC colleagues, when delivering events and services to children are required to follow the organisation's codes of conduct and other relevant organisational policies e.g. health and safety in order to ensure:

- Appropriate dress, behaviour and language
- Health and safety remains your priority
- Safe use of vehicles to transport people
- Relevant image consents are in place
- Colleague ratios are adequate when supervising children at events
- Children are safe from harm

To ensure events and services for children comply with FCDC's safeguarding policy, staff must ensure that:

- A full risk assessment is carried out for activities and venues before an event takes place
- Full insurance cover is in place and checked for the activity and venue

Appropriate licenses/registrations and checks are in place when working with or using third party organisations or instructors

- The required medical and consent forms are received and checked before the event
- Appropriate insurance and ratio of colleagues is in place if children are transported in private vehicles or vehicle hire i.e. minibus

### Supervision and First Aid

When running events and activities for children and young people, FCDC colleagues must ensure:

- There is at least one first aid trained person, with access to a first aid kit
- There is at least one supervising adult for every six children (age 3+) or ratio stipulated by the relevant local authority
- That children remain the responsibility of their parent/carer at family events at all times (unless otherwise stated).
- Appropriate steps and safeguarding measures are put in place to ensure the safety of all children and young people attending FCDC events and activities
- That everyone is aware of their role and responsibilities
- That colleagues are confident, well and able to take on the role they have been allocated/assigned to
- That colleagues are aware of the individual needs of the children attending
- That colleagues running the event have the required consent, medical information and emergency contact forms for those attending
- Attendees understand the requirements in relation to photography, image sharing and social media activity



## 10. Online Safety

FCDC recognises that the online world provides everyone with many opportunities, however it can also present risks and challenges and we have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online. Children should be able to use the internet for support, education and personal development, but safeguards must be in place to ensure safety at all times.

FCDC operates a whole charity approach to online safety, empowering us to protect and educate staff, volunteers and service users in their use of technology.

All staff and volunteers, regardless of whether or not their role includes working with children and young people directly, must understand that FCDC have a responsibility to;

- help keep children and young people safe online, whether or not they are using FCDC's network and devices.
- ensure that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- work in partnership with children, young people, their parents/carers and other agencies in helping young people to be responsible in their approach to welfare and safety (online and offline)
- maintain, review and update the security and integrity of FCDC ICT systems, social media accounts and website.

The breadth of issues classified within online safety at FCDC can be categorised into four main areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with other users
- **Personal online behaviour that increases the likelihood of, or causes, harm**
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

FCDC will ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning any staff training, the role and responsibilities of the DSL and any parental engagement.

Colleagues working in frontline services and involved in our fundraising and marketing work will undertake face-to-face safeguarding training every two years and take online refresher courses.

Online safety training will be embedded into staff and volunteer learning and development plans. Training will include how to identify; cyberbullying, emotional abuse, sexting (coercion), sexual abuse and sexual exploitation.

Please see FCDC's Digital Safeguarding Policy for more information and guidance.

## **11. Record Keeping and Information Sharing**

All concerns, discussions and decisions made relating to safeguarding, and the reasons for those decisions, should be recorded in writing. Information will be kept confidential and stored securely.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed.

Records should include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the Designated Safeguarding Lead (DSL) or Designated Safeguarding Trustee (DST).

The records created, in accordance with this Policy and associated safeguarding procedures, may contain personal data. Staff and volunteers must ensure that they follow FCDC's Privacy Policy when handling personal data.

FCDC will treat all safeguarding information with an appropriate level of confidentiality, and only involving others when appropriate.

The Charity understands that information sharing is essential for effective safeguarding and promoting the welfare of children. Fears about sharing information will not stand in the way of the need to promote the welfare and protect the safety of children.

FCDC will cooperate with relevant statutory authorities and ensure that relevant information is shared with them for the purposes of their statutory assessments / purposes. The Chair of the charity will ordinarily determine when and how information should be passed to other agencies, in consultation with the Board of Trustees and DSL. However, this does not prevent the sharing of information in accordance with the referral process set out within this Policy.

The Centre Manager is the 'Data Controller' at FCDC and will provide guidance to staff and volunteers on data protection and GDPR.

The DST works with the DSL to ensure that safeguarding records are kept separately, securely and in accordance with confidentiality and data protection principles, laws, regulations and the charity's Privacy Policy.

FCDC will have due regard to 'Working Together to Safeguard Children 2023' and local statutory guidance/protocols in relation to Information Sharing.

## **12. Confidentiality and GDPR**

In all cases, safeguarding has a priority over confidentiality and keeping secrets. confidentiality cannot be given to children, adults or family members.

However, all staff and volunteers must agree to keep all information that they receive, confidential to those that need to know. This means they act accordingly, e.g. following the General Data Protection Regulations and Child Protection guidelines, FCDC Confidentiality Policy, and informing other team members only if instructed to do so by their line manager.

The Centre Manager (Data Controller) must be informed of any information that is seen as confidential to FCDC's services, before any further actions or decisions are made.

Any electronic communication must use appropriate password-protected or encrypted systems to maintain confidentiality on a need to know basis.

Staff, contracted professionals and volunteers should have regard to Data Protection Act 2018 and the GDPR to keep information safe and secure. However, The Data Protection Act and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

### Data Retention

FCDC recognises the responsibility it has to record and retain safeguarding data, supporting the guidance given in The Data Protection Act (2018). The Data Protection Act categorises the 'safeguarding of children and individuals at risk' as Special Category Data. This definition enables Data Controllers to process and store adult and child protection data indefinitely to prevent harm and reduce the risk of abuse. FCDC acts in accordance with this legislation, storing safeguarding data indefinitely because there is legitimate interest to do so. This decision is justified by the fact that it is in the public interest to retain this information; deleting safeguarding data may increase the risk of harm or impact future enquiries. Any decisions to delete protection data will be considered, justified, and recorded.

## **13. Code of Safe Conduct**

To support effective safeguarding and the implementation of this policy: all staff, volunteers, contracted professionals and sessional workers must comply with FCDC's Code of Safe Conduct as detailed below:

- I. You must act in compliance with FCDC's Safer Recruitment Policy, including providing without delay:
  - information to enable relevant checks to be carried out against you as required by your role, including (but not limited to) DBS checks
  - evidence (on request) of any qualifications, certificates or other eligibility criteria for your role, e.g. DBS certificate
  - information about any relevant police record or other information which may mean that you are unsuitable to work with children. This would include any disciplinary measures related to safeguarding investigations in previous or other current roles; and
  - providing up to date reference information (as requested).
- II. You must comply with this Policy at all times and record and report any safeguarding concerns or allegations in accordance with this Policy, ensuring you have FCDC safeguarding contact details saved on your phone.
- III. You must comply with external agency safeguarding policies if you are involved in FCDC activities or services taking place in school or other community settings, ensuring you have the contact details for the Designated Safeguarding Leads.
- IV. You must demonstrate empathy, humility and respect and act as a role model for others, maintaining high standards of professionalism and integrity at all times.

- V. You must maintain a strictly professional relationship with all the children and young people you come into contact with through your work with FCDC and ensure that all interactions are such that no reasonable person could observe an interaction and construe its nature as abusive or concerning.
- VI. You must not have unnecessary physical contact with a child or young person. For example, by doing something of a personal nature that they can do for themselves, such as dressing or using the bathroom.
- VII. You must not develop a physical or sexual relationship with a child/young person or behave in a way that is sexually provocative or suggestive.
- VIII. Unless authorised as part of FCDC service delivery, you must not have one- to-one contact with a child and should avoid being in any situation where this may arise. In circumstances where it is necessary to have one-to-one contact (e.g. for the purposes of providing FCDC support services, use a room with windows, leave the door open, and let another adult (e.g. the Centre Manager) know where you are, with whom and what you are doing.
- IX. You must not condone or participate in behaviour of children which is illegal, unsafe or abusive.
- X. You must not act in a way that may place a child or young person at risk of abuse from others.
- XI. You must not smoke or be under the influence of alcohol or illegal drugs in the presence of a child or young person.
- XII. You must not meet or contact a child outside of an FCDC trip or event or by any electronic means (including via social media platforms) other than in a scheduled an approved support session.
- XIII. You must not develop relationships or conduct yourself in a way with a child/young person that could be deemed emotionally exploitative or abusive or act in ways intended to shame, threaten, humiliate, belittle, coerce or otherwise emotionally harm, abuse or manipulate children. For the avoidance of doubt, the giving of constructive and supportive feedback on effort, attainment, behaviour and participation or similar will not be considered such a relationship or conduct.
- XIV. When working within external community or school settings, you should ensure that you comply with their safeguarding policy and procedures, code of conduct and any other relevant applicable policies.
- XV. All online support should be conducted in accordance with FCDC policies.
- XVI. When providing FCDC support services or education sessions online, you must:
  - conduct FCDC sessions through FCDC approved platforms only (e.g. Microsoft Teams or Zoom)
  - find an appropriate, private place to conduct the session
  - if a child is present online without a parent or carer present, you must end the online session immediately
  - not share files or other information directly

- never private message a child except through FCDC's moderated chat functions in Zoom and Teams
- ensure that where children are connecting online from home (and not from FCDC) that the session is recorded and the recording is held securely in accordance with FCDC's data protection policies.

Failure to comply with FCDC's Code of Safe Conduct and Safeguarding Policies will be treated very seriously.

This Code of Safe Conduct, FCDC's Code of Conduct for Staff and Volunteers and FCDC's 'Golden Rules' behaviour code for children, young people and families accessing our services, are available on the FCDC shared drive.

#### **14. Safeguarding Children and Young People Procedures**

FCDC's Safeguarding Children and Young People Procedures are an integral part of this Safeguarding Policy and must be read and complied with in conjunction with this policy.

All new staff, contracted professionals, sessional workers and volunteers (including Trustees) will be provided a copy of FCDC safeguarding standards, policies and procedures during their induction. Copies of these documents are also available on FCDC's shared drive.

#### **15. Multi-Agency Working**

Multi-agency working and information sharing is key to effective safeguarding. Safeguarding legislation gives the lead role for safeguarding children to the Local Authority. However, it is recognised that safeguarding can involve a wide range of organisations. In this context, FCDC may need to cooperate with the Local Authority and the Police including to:

- Provide more information about a concern you have raised.
- Provide a safe venue for a child/young person/family members/parent or carer to meet with other professionals e.g. Police/Social Workers/Advocates.
- Attend safeguarding meetings.
- Coordinate internal investigations (e.g. complaints, disciplinary) with investigations by the police or other agencies.
- Share information about the outcomes of internal investigations.

#### **16. Policy Monitoring and Review**

The implementation of this policy will be reviewed regularly by the DSL and Board of Trustees and an annual report will be compiled by the DSL and presented to the Board.

This policy, together with its associated procedures, will be reviewed and updated annually or earlier in the event of relevant changes in safeguarding legislation or statutory guidance.

## **APPENDIX 1**

### **FCDC Safeguarding Role Descriptions**

#### **Designated Safeguarding Lead (DSL)**

The designated person at FCDC has primary responsibility for putting into place procedures to safeguard children and young people, supporting staff/volunteers and where relevant managing concerns about children and young people.

DSL Duties and responsibilities include:

- Working with others within the organisation to create a positive inclusive environment within the sport.
- Playing a lead role in developing and establishing the organisation's approach to safeguarding adults and in maintaining and reviewing the organisation's implementation plan for safeguarding adults in line with current legislation and best practice.
- Coordinating the dissemination of the safeguarding adult policy, procedures and resources throughout the organisation.
- Contributing to ensuring other policies and procedures are consistent with the organisation's commitment to safeguarding adults.
- Advising on the organisation's training needs and the development of its training strategy.
- Writing and sharing reports on and managing cases of poor practice and abuse reported to FCDC.
- Arranging and coordinating safeguarding training at an appropriate level to FCDC roles
- Preparing and delivering safeguarding briefings for FCDC staff and volunteers
- Maintaining an appropriate recording system.
- Supporting FCDC's Chair to co-ordinate the case management process.
- Managing liaison with, and referrals to, external agencies. For example: adult social-care services and the police.
- Creating a central point of contact for internal and external individuals and agencies concerned about the safety of adults within the organisation.
- Providing advice and support to staff, volunteers and the Board of Trustees.
- Taking a lead role in the recruitment, selection and training of staff and volunteers.
- Representing the organisation at external meetings related to safeguarding.

# Designated Safeguarding Trustee (DST)

## 1. Role purpose

The purpose of the role is to support The Family Centre Deaf Children (FCDC) to create a safe and welcoming environment, where everyone is respected and valued. It's about making sure FCDC is run in a way that actively prevents harm, harassment, bullying, abuse and neglect; and to ensure that the charity is ready to respond safely and well if there is a problem.

## 2. Principal responsibilities

The lead trustee for safeguarding takes on the following duties in addition to their wider responsibilities as a trustee.

- **Strategic leadership**
- Consider the organisation's strategic plans and make sure they reflect safeguarding legislation, any regulations specific to our activities, statutory guidance, and the safeguarding expectations of the Charities Commission.
- Work with FCDC's Designated Safeguarding Lead regularly to review whether the things the organisation has put in place are creating a safer culture and keeping people safe.
- Check the organisation's risk register reflects safeguarding risks properly and plans sensible
- measures to take, including relevant insurance for trustees' liability.
- Make sure there is space on the agenda for safeguarding reports and help trustees understand and challenge those reports.
- **Effective policy and practice**
- Make sure there is an annual review of safeguarding policies and procedures and that this is reported to trustees.
- Understand the monitoring activity to see whether policies and procedures are effective.
- Call for audits of qualitative and quantitative data (either internal or external) as needed.
- Learn from case reviews locally and nationally, to improve the organisation's policies, procedures
- and practices.
- Oversee safeguarding allegations against staff or volunteers, together with the Senior Leader and Designated Safeguarding Lead.



## APPENDIX 2

### Signs and Types of Abuse

The following examples cover the types of abuse and what this can look like.

This is predominantly taken from NSPCC guidance 2020 with some additional information from other specialist safeguarding guidance.

<https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>

#### 1. Physical abuse

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. It is 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 (FI).

##### Signs of physical abuse:

All children have trips, falls and accidents which may cause cuts, bumps and bruises. These injuries tend to affect bony areas of their body such as elbows, knees and shins and are not usually a cause for concern.

Injuries that are more likely to indicate physical abuse include:

##### Bruising

- 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.

##### Burns or scalds

- 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.

Other signs of physical abuse include multiple injuries (such as bruising, fractures) inflicted at different times.

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.

#### 2. Neglect

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:

- 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. 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.

### **Signs of 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 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 and level of known disability
- 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.
- Children who are consistently not collected or and absent family carer when returned to the family home

### **3. Sexual abuse**

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 is what is happening. Child sexual abuse can involve contact abuse and/or non-contact abuse.

Contact abuse happens when the abuser makes physical contact with the child. It includes:

- 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.

Non-contact abuse involves non-touching activities. It can happen online or in person and includes:

- 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'.

### **Signs of sexual abuse**

There may be physical signs that a child has suffered sexual abuse. These include:

- 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
- 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.

For example:

- 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

## **4. 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.

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).

Child sexual exploitation can involve violent, humiliating and degrading sexual assaults and involve multiple perpetrators.

### **Signs of child sexual exploitation**

Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour. Young people who are being sexually exploited may:

- go missing from home, care or education
- 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.

## **5. Harmful Sexual Behaviour (HSB)**

Children and young people who develop harmful sexual behaviour harm themselves and others.

HSB can include:

- using sexually explicit words and phrases
- inappropriate touching
- using sexual violence or threats
- full penetrative sex with other children or adults.

Sexual behaviour between children is also considered harmful if one of the children is much older – particularly if there is more than 2 years' difference in age or if one 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).

### **Signs of harmful sexual behaviour**

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.

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.

## **6. Emotional abuse**

Emotional abuse is persistent and, over time, it severely damages a child's emotional health and development.

It involves:

- humiliating, putting down or constantly criticising a child
- shouting at or threatening a child or calling them names
- mocking a child
- 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
- 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.

## Signs of emotional abuse

There aren't usually any obvious physical signs of emotional abuse but you may spot signs in a child's actions or emotions.

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 and level of need.

Babies and pre-school children who are being emotionally abused may:

- 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.

## 7. Domestic Abuse

Domestic abuse is any type of controlling, coercive, threatening behaviour, violence or abuse between people who are, or who have been in a relationship, regardless of gender or sexuality. It can also happen between adults who are related to one another. Domestic abuse always has an impact on children.

Domestic abuse can include:

- coercive control such as being told where to go and what to wear or being isolated from friends and family
- physical abuse such as being punched, kicked, cut, or being hit with an object
- emotional abuse such as being constantly undermined, sworn at, intimidated, ridiculed, harassed, or threatened with harm or death
- sexual abuse and rape including within a relationship or being made to have sex with other people
- stalking and harassment such as being repeatedly followed or spied on, being regularly given unwanted gifts or receiving unwanted communication
- economic and financial abuse such as having access to money controlled or withheld or being prevented from earning money
- technology-facilitated abuse such as having messages and emails monitored or deleted, constantly being sent messages or calls, or being tracked via device location

Being exposed to domestic abuse in childhood is child abuse. Children and young people may experience domestic abuse both directly and indirectly.

Children and young people may experience:

- not getting the care and support they need from their parents or carers as a result of the abuse
- hearing the abuse from another room
- seeing someone they care about being injured and/or distressed
- finding damage to their home environment like broken furniture
- being hurt from being caught up in or trying to stop the abuse
- being denied access to parts of their home, such as rooms being locked
- being forced out of or losing their home

### **Signs of domestic abuse**

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:
  - 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.

### **8. Bullying and cyberbullying**

(please also refer to FCDC Anti-Bullying and Harassment Policy)

Bullying is when individuals or groups seek to harm, intimidate or coerce someone who is perceived to be vulnerable.

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
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name.

## Spotting the signs of bullying and cyberbullying

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:

- 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.

Indicators that signal that children are at risk from or are involved with, serious violent crime:

- Unexplained gifts/new possessions
- Increased absence
- Changes in friendships, relationships
- Significant decline in academic performance
- Signs of self-harm / significant change in well-being
- Signs of assault / unexplained injuries

## 9. Child Trafficking

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.

Children are trafficked for:

- 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.

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.

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.

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.

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).

### **Signs of child trafficking**

Signs that a child has been trafficked may not be obvious, but you might notice unusual behaviour or events.

These include a child who:

- 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
- 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.

### **10. Female Genital Mutilation (FGM)**

Female genital mutilation is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting.

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).

Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence.

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.

Signs of 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 or sessions 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.

### Reporting requirements

Regulated health and social care professionals and teachers in England and Wales must report 'known' cases of FGM in under-18s to the police (Home Office, 2016).

## **11. Child on Child Abuse**

Child-on-child abuse: children can abuse children (referred to as peer on peer abuse). This is likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers (sometimes known as 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission,, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- teenage relationship abuse – defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

## **12. Organisational Abuse**

Organisation abuse is abuse that happens when professionals (e.g. care workers, doctors and nurses) misuse their role, power and/or trust. For example, they may not act on suspected abuse/crimes; provide poor care or neglect the services they should provide; have a sexual relationship with a patient/client; provide poor, ill-informed, or out-of-date practice; not provide support for a young person to access health care/treatment. Abuse can happen in residential services when groups of users live together, but are incompatible or where there are negative responses to challenging



behaviours. Organisational abuse can also be a result of policies, practice and processes within an organisation

### **13. Radicalisation**

Radicalisation is comparable to other forms of exploitation, such as grooming and child sexual exploitation. The aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views, and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

#### **Preventing radicalisation**

Protecting children from the risk of radicalisation should be seen as wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help and protection. Staff should use their judgement in identifying children who may be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

#### **Prevent**

From 1st July 2015, specified authorities, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. The Prevent duty builds on existing local partnership arrangements. Safeguarding arrangements must take into account the policies and procedures of the Local Safeguarding Partnerships. Effective engagement with parents and families should also be considered as they are in a key position to spot signs of radicalisation. The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extreme ideas.

<https://www.gov.uk/government/publications/prevent-duty-guidance>

#### **Channel**

FCDC also have a duty to ensure that children are safe from terrorist and extremist material when accessing the internet.

Staff should understand when it is appropriate to make a referral to the Channel programme. This is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools and services to make referrals if they are concerned that an individual might be vulnerable to radicalisation. The engagement with this programme is voluntary and they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required.

<https://www.gov.uk/government/publications/channel-guidance> for more information.

## APPENDIX 3

### Key Definitions and Terminology

- **A child:** anyone who has not yet reached their 18th birthday, including unborn children.
- **Safeguarding children:** the process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.
- **Child protection** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
- **Child abuse** happens when a person (adult or child) harms a child. It can be physical, sexual or emotional, but can also involve a lack of love, care and attention. A person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.
- **Abuse:** any act where a person experiences intentional harm caused by an adult or another child. The definition also covers situations where a child experiences harm due to neglect. It is the violation of a person's human and civil rights by any other person/s.
- **A child at risk** is defined as any child that is currently experiencing or may experience neglect, abuse or any form of harm and thus has a need for care or support. The term 'at risk' denotes any situation where action needs to be taken to prevent abuse, harm or neglect from occurring or from continuing to occur.
- **Contextual safeguarding:** the process of understanding and responding to children's experiences of harm, abuse or neglect outside the family environment, including at school, online, within their immediate neighbourhoods or during extra-curricular activities.
- **A low-level concern** means concerns / allegations about the conduct of a person which do not meet the threshold of an allegation
- **A safeguarding query** means a question or query relating to safeguarding which is not a concern or allegation.
- **A safeguarding concern** is a concern that a child is or may be at risk of being abused or neglected.
- **A safeguarding allegation** means that a person who works with children is said to have:
  - behaved in a way that has harmed a child or may have harmed a child
  - Possibly committed a criminal offence against or related to a child
  - behaved towards a child or children in a way that indicates that they may pose a harm to children
  - behaved in such a way that indicates that they may not be suitable to work with children. This may include behaviour that happens outside of the work context.

## APPENDIX 4

### Child Protection Legislation in England

The Department for Education (DfE) is responsible for child protection in England. It sets out policy, legislation and statutory guidance on how the child protection system should work.

This legislation provides the framework for safeguarding and child protection in England. It makes clear the expectations and requirements around duties of care to children and creates accountability for these.

#### 1.1 Who is responsible for safeguarding and child protection?

Local safeguarding statutory partners are responsible for child protection policy, procedure and guidance at a local level:

- the local authority (council)
- the Integrated Care Board (ICB, previously clinical commissioning group or 'CCG')
- the police.

Working together with other relevant agencies, these partner agencies must co-ordinate and ensure the effectiveness of work to protect and promote the welfare of children, including making arrangements to identify and support children at risk of harm

#### 1.2 What legislation relates to safeguarding children?

There are four major pieces of legislation regarding safeguarding in the UK:

**[The Care Act 2014](#)** – This is the main legislation related to safeguarding in the UK. Although aimed at vulnerable adults, the principles contained in this Act can also be applied to children.

**[The Children Act 1989](#)** – This act enshrines in law the concept that the safety of children is paramount. It details safeguarding frameworks for social workers, courts and local authorities. This act was amended by the [Children Act 2004](#), which encourages a more child-centric, integrated approach.

**[The Children and Social Work Act 2017](#)** – This act enhances the regulations laid down by the Children Act 1989 and provides guidelines for improved support for children in care.

**[The Safeguarding Vulnerable Groups Act 2006](#)** – This act deals with the vetting process related to employing people who will deal with children or vulnerable adults. Its aim is to prevent unsuitable people from being placed in positions where they could cause harm to children or vulnerable adults.

Other relevant legislation relating to safeguarding includes (but not limited to):

[The Health and Social Care Act 2012](#)

[Domestic Abuse Act 2021](#)

[The Mental Capacity Act 2005](#)

[The Equality Act 2010](#)

[The Human Rights Act 1998](#)

[Keeping Children Safe in Education 2020](#)