

Holbeach Children's Club

Safeguarding and Child Protection Policy

Date adopted: 22 June 2022

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Owner: D. Hackin

Holbeach Children's Club is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Version Control

| Version | Author | Dated | Status | Reviewed date |
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| 1. | DH | June 2022 | Initial Policy | June 2023 |

Change History

| Date | Author | Agreed | Changes |
|------|--------|--------|---------|
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Safeguarding and Child Protection Policy

- Introduction** This document is a statement of the aims, principles and procedures for the protection and safeguarding of the children who attend Holbeach Children's Club (HCC).
DfE guidelines and current legislation have been taken into consideration in the formulation of this policy. It should be read in conjunction with the policies of Holbeach Children's Club on Safer Recruitment, Staff Code of Conduct, Online Safety, Social Networking and Media, Behaviour, Anti-Bullying, Positive Handling, and Health and Safety.
- Rationale** The Board of Trustees takes seriously its responsibility to safeguard and promote the welfare of children, regardless of age, gender, race, culture or disability; and to work together with other agencies to ensure adequate arrangements within Holbeach Children's Club to identify, assess, and support those children who are suffering harm.
We recognise that all adults, including temporary staff, volunteers and Trustees, have a full and active part to play in protecting our children from harm, and that the child's welfare is our paramount concern. Equally, we recognise the central importance of role-modelling and promoting tolerance and respectful relationships.
All staff believe that our club should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child. Nevertheless, we understand that safeguarding incidents could happen anywhere, and at any time. We are alert to possible concerns being raised within our club.
- Aims and objectives** This policy ensures that all staff at Holbeach Children's Club are clear about the actions necessary with regard to a child protection issue. Its aims are:
- to raise the awareness of all staff and identify responsibility in reporting possible cases of concern and abuse;
 - to ensure effective communication between all staff when dealing with child protection issues;
 - to lay down the correct procedures for those who encounter an issue of child protection;
 - to provide a systematic approach to monitoring children known or thought to be at risk of harm
 - to develop and promote multi-agency working.

Roles and responsibilities around safeguarding and child protection

All staff must ensure they have attended appropriate training and that they have up-to-date knowledge. They are required to read certain documents (see Appendix 11).

All staff must be aware that possible signs of abuse can occur anywhere and at any time. Staff should be alive to the fact that such signs can present themselves in many different ways and that, as outlined in the Staff Code of Conduct, it is part of their duty of care to be vigilant and report any such concerns.

Staff must ensure that children feel comfortable to make a disclosure, listen to them and know what to do next (see Appendix 2).

Holbeach Children's Club's Manager is the **Designated Safeguarding Lead (DSL)** who is responsible for:

- co-ordinating action within the club and liaising with Children's Social Care and other agencies over cases of abuse and suspected abuse;
- acting as a source of advice within the club;
- ensuring that staff are familiar with the policy and procedures;
- record keeping;
- referral of individual cases of suspected abuse;
- arranging and leading regular Safeguarding Team meetings;
- liaising with agencies about individual cases and
- organising training on child protection within the club.

The DSL is supported in Holbeach Children's Club by a Safeguarding Team, which includes at least one Deputy Designated Safeguarding Lead (DDSL) who, where necessary, will deputise for the DSL. The Safeguarding Team should consist of no less than two people.

The **Trustee Responsible for Safeguarding** must ensure that there is a DSL in post. He or she must ensure that up-to-date records relating to Child Protection are kept. These include:

- Staff training records;
- Signed Code of Safe Conduct forms;
- The Single Central Register (SCR).

Volunteers who work at Holbeach Children's Club should have a basic understanding of Child Protection issues, be vigilant and report any concerns to a member of staff.

The Board of Trustees has an overarching role in ensuring that policies, procedures and training in Holbeach Children's Club are effective and comply with the law at all times. It should receive reports pertaining to safeguarding on a termly basis, eg. numbers of referrals, instances of physical intervention and complaints regarding staff.

Partnership Working

From September 2019 all Local Safeguarding Children Boards (LSCBs) were replaced with Safeguarding Partnerships. Each locality has access to its own dedicated team of Safeguarding Partners who will work collaboratively to strengthen the child protection and safeguarding system in the local area.

The Lewisham Safeguarding Children Partnership consists of a team of key professionals from:

- The Local Authority;
- Lewisham Clinical Commissioning Group;
- Metropolitan Police

Together, the three Safeguarding Children Partners will be responsible for agreeing on and implementing new safeguarding strategies that should improve multi-agency working capacity and, in turn, improve the provision of safeguarding and child protection agreements in the local area. To achieve this, the Lewisham Safeguarding Children Partnership has outlined exactly how the partners will work together with all relevant agencies and have made clear their arrangements for conducting local reviews. These arrangements can be found at: <https://www.safeguardinglewisham.org.uk>

Recognising abuse and taking action

1. If any member of staff or adult working within Holbeach Children's Club suspects that a child may be a victim of abuse, they **MUST** immediately (within fifteen minutes) inform the DSL about their concerns. In the event of neither person being available, the Trustee Responsible for Safeguarding should be informed. See Appendix 4 for guidance on recognising abuse.
2. The person should make a written note of their concerns and/or any disclosure that a child may have made. The written note should be given to the DSL or DDSL as soon as possible. See Appendix 2 for guidance about speaking to children when making a disclosure and Appendix 5 for the proforma for reporting a concern.
3. Any disclosures made by victims of abuse should be taken seriously by all staff, victims should be kept safe and never be made to feel like they are creating a problem by reporting abuse, sexual violence or sexual harassment.

Following the report of a concern:

4. In extreme circumstances the person reporting the concern may make a direct referral to the **Multi-Agency Safeguarding Hub (MASH)** team, but usually the DSL will decide whether a referral should be made, in accordance with Lewisham Safeguarding Children Partnership guidelines. This is best done in consultation with other members of the Safeguarding Team or an adviser at the MASH team.
5. In cases where it is felt that discussing the matter with the parent or carer would place the child at risk of harm, the DSL must not inform the guardian of a referral. In such instances the MASH team should be contacted immediately and, where a direct and immediate threat to the child's safety exists, the Police.

6. If the DSL decides that a referral is not necessary, they should decide what other actions should be taken. These could include the following:
 - a. A meeting with the parents or carers to agree working together arrangements;
 - b. Support and advice provided internally (e.g. strategies for managing behaviour);
 - c. Sign-posting or referral to external agencies for support (e.g. Holbeach Primary School)
7. Any action that the DSL takes when dealing with an issue of Child Protection must be in line with the procedures outlined in the London Child Protection Procedures and by Lewisham Safeguarding Children Partnership.
8. Following a reported concern, the DSL will later ensure that the reporting member of staff knows what further action has been taken, such as referral to Children's Social Services. If the case is taken up by an external agency, then the designated person will make sure that he or she is kept informed on developments and will also update the staff member concerned as appropriate.
9. The person who first raised the concerns should seek to reassure themselves that appropriate action has been taken to safeguard the child. If they strongly believe that this is not the case they should challenge the DSL, and if necessary report their concerns to the Trustee Responsible for Safeguarding or directly to the MASH team, or **Local Authority Designated Officer (LADO)**, if the concern relates to an adult working within the club. See Appendix 1 for details of key persons.
 It remains the right and duty of every adult within the club community to report a safeguarding concern directly to the MASH or LADO if they feel it necessary to ensure that appropriate action is taken to safeguard a child's interests.
10. Records of all concerns, referrals and correspondence with Children's Social Services will be recorded and kept in secure storage by the designated persons. Only the designated persons will have access to these records.

Training and induction for staff

All adults who work at Holbeach Children's Club receive regular training to raise their awareness of abuse and their knowledge of agreed local child protection procedures.

All members of the Safeguarding Team must attend appropriate (higher level) training every two years.

In addition to formal training, the DSL should ensure that his or her knowledge and skills are updated at regular intervals (at least annually) through attendance at local training events and conferences.

All staff and Trustees must attend appropriate child protection training, including online safety, which is regularly updated (every two years). They should also receive regular safeguarding and child protection updates as required, through the Trustee Responsible for Safeguarding. They must familiarise themselves with this policy and club procedures.

All staff and Trustees must undertake regular (three yearly) PREVENT training.

Training is provided for all regular volunteers, including Trustees. They are expected to read key documents.

Key staff and Trustees undergo 'Safer Recruitment' training every five years.

Records of training and copies of certificates should be kept by the DSL at Holbeach Children's Club.

Preventing peer-on-peer abuse

We recognise that some children will sometimes negatively affect the wellbeing of others and their behaviour will be dealt with under the club's Behaviour Policy.

Occasionally, allegations may be made against children by others in the club, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation.

Peer-on-peer abuse can and will occur on any site even with the most robust policies and support processes. It is important to develop appropriate strategies to proactively prevent peer-on-peer abuse. Holbeach Children's Club has an open environment where young people feel safe to share information about anything that is upsetting or worrying them.

Staff will not dismiss issues as 'banter' or 'growing up', or compare them to their own experiences of childhood. Any disclosures made by victims of abuse should be taken seriously by all staff, victims should be kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

Staff will consider each issue and each individual in their own right before taking action. Young people are part of changing their circumstances and we encourage young people to support changes and develop 'rules of acceptable behaviour'. We involve children in the positive ethos in the club; one where all young people understand the boundaries of good behaviour.

Children who may be particularly vulnerable

Some children may be at increased risk of neglect and or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

To ensure that all of our children receive equal protection, we will give special consideration and attention to children who are:

- disabled or have special educational needs
- living in a known domestic abuse situation
- affected by known parental substance misuse
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- living transient lifestyles
- living in chaotic, neglectful and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- involved directly or indirectly in prostitution or child trafficking
- do not have English as a first language.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the club and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputy) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Safer recruitment Holbeach Children's Club is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Our Safer Recruitment Policy outlines procedures that help deter, reject or identify people who might abuse children.

Actions include:

- All adults employed at Holbeach Children's Club are subject to appropriate safeguarding checks through the Disclosure and Barring Service (DBS).
- All stages of recruitment comply with the principles and recommended procedures of 'Safer Recruitment' training
- A person who has successfully completed 'Safer Recruitment' training is in attendance at all shortlisting meetings and interviews.

The Single Central Record All adults supporting children within Holbeach Children's Club, whether paid or voluntary, are subject to appropriate safeguarding checks. The checks are recorded within a Single Central Record and evidence held on file.

Volunteers who work at the club on a regular basis will also be subject to enhanced DBS checks and details will be recorded on the Single Central Record.

All other persons who work with children will be asked to provide proof of identity and evidence of full safeguarding checks being carried out. The checks will be recorded within the Single Central Record.

All visitors to the club who engage in regulated activity with the children, including contractors working on site, will be asked to provide evidence that full safeguarding checks have been carried out and provide proof of identity. These checks will be recorded within the Single Central Record.

All other visitors to the club will be asked to provide proof of identity and will be accompanied by a member of staff at all times if not able to evidence clearance of an enhanced DBS check.

Trustees will be subject to enhanced DBS safeguarding checks and details will be recorded on the Single Central Record.

Responsibility for ensuring safeguarding checks are carried out lies with the Board of Trustees.

Temporary staff provided by external staff agencies will be pre-booked. The employer will provide evidence of safeguarding checks being completed. On their first engagement with the club, agency staff will be asked to provide proof of identity on arrival to the senior member of staff on duty.

Contractors who work unaccompanied on site will be required to show proof of identity on arrival at the site together with a letter from their employer stating that safeguarding checks have been completed. A copy of this letter will be retained and its provision evidenced within the Single Central Record.

We recognise that all information is confidential. Copies of safeguarding checks and proof of identity retained on file will be kept electronically and only retained in line with current data protection legislation. The electronic Single Central Record is password protected.

Allegations of abuse against staff

Holbeach Children's Club must follow the procedures set out in statutory guidance when managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity-including supply staff and volunteers. This guidance should be followed regardless of whether the club is the location where the alleged abuse took place.

In the event of an allegation of abuse of a child made against a member of staff or volunteer, the following procedure should be adopted:

1. If a child reports that they have been abused by a member of staff or volunteer, they should be listened to in the same way as any other disclosure of abuse.
2. A written, signed and dated record of the allegation should be made as soon as is practicable by the staff member to whom the disclosure was made and submitted without delay to the DSL (or DDSL if the DSL is unavailable). If the DSL is the person against whom the allegation is made, the staff member must report the allegation directly to the Trustee Responsible for Safeguarding.
3. The DSL, DDSL or Trustee Responsible for Safeguarding, as the case may be, should then immediately inform the LADO.
4. The reporting professional will discuss the allegation with the LADO. The purpose of an initial discussion is to consider the nature, content and context of the allegation and agree a course of action. The club will then proceed in accordance with the guidance provided by LADO.

The procedures for dealing with allegations need to be applied with common sense and judgement. Creating a culture in which all concerns about adults [including allegations that do not meet the harms threshold] are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of abuse. More details of what low-level concerns are and how they are recorded can be found in Appendix 10. Many cases may well either not meet the criteria set out above, or may do so without warranting investigation or enquiries by local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police. The LADO should be informed of all allegations that come

to the club's attention and appear to meet the criteria so that they can consult police and children's social care services as appropriate.

Appropriate Touch

There are occasions when some physical contact with staff is necessary to ensure and promote the well-being of children. The club categorises three such types of physical contact between adults and children. These are:

Casual/Informal/Incidental Touch is a degree of physical contact used as part of maintaining normal, nurturing professional relationships with children and appropriate to age and stage.

This might include staff patting a child's back in congratulation, putting an arm around a distressed child in consolation or an adult being hugged by a child as a greeting. Contacts may be either child or adult initiated.

Limited touch can also be used appropriately in supporting some activities when there is a physical dimension to the activity, for example in guiding a child to use a pair of scissors in an art or craft activity.

Staff should be aware that such contacts must be both proportionate and intended exclusively for the emotional benefit of the child. As soon as it is appropriate, alternative, non-physical interaction should be sought in a manner which does not cause upset to the child.

Reparative Touch is a more frequent degree of physical contact used by staff working with children at a much earlier stage of their emotional development or children identified with additional emotional needs.

The main purpose of such contact is to soothe or calm a distressed child. Examples of this might include putting an arm around a child, sitting a child on an adult's knee or squeezing an arm for comfort. Where possible, this should take place within sight of colleagues and, for older children with additional needs, this should be planned in conjunction with parents.

Positive Handling is a physical intervention used to prevent from or limit the risk of children hurting themselves or others

In extremis, there may be times when, in the course of their safeguarding duty, adults in our club might have no other option than to use physical intervention to keep children safe or prevent significant damage to equipment or property. This must only be done in accordance with the HCC Behaviour Policy. The adult(s) involved in any such incident should report this immediately, and record it using the appropriate form.

Specific and current concerns

Holbeach Children's Club is aware of a number of specific and current concerns relating to the safeguarding of children. These include:

- Child Criminal Exploitation
- Child Sexual Exploitation
- Private Fostering
- Female Genital Mutilation
- Extremism and Radicalisation
- Self-Harm
- Online Safety

- Serious Violent Crime
- Upskirting

All staff are expected to familiarise themselves with these issues and the club's guidance, which can be found in Appendix 7 or in specific policy documents.

Vulnerable children

A child may be identified as vulnerable if he or she is looked after by the local authority or experiences difficulties in the areas of health, development, emotional well-being, behaviour or learning that are likely to affect their life-chances. These may be temporary or more long-lasting.

Local authorities should share the fact a child has a social worker, and the Designated Safeguarding Lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Audit

Trustees will carry out an annual audit of Child Protection procedures.

Sharing this policy

All parents and carers will be made aware of the HCC Safeguarding and Child Protection Policy.

Whistleblowing

All staff should be aware of their duty to raise non-safeguarding related concerns about colleagues to the Manager in accordance with the HCC Whistleblowing Policy. If the allegation is against the Manager, then it should be reported to the Chair of Trustees.

Review

This effectiveness of this policy will be reviewed annually by the Trustees. It will be reviewed every year or sooner if changes to guidance on best practice necessitate it.

APPENDICES

1. Key Persons
2. When a Child Makes a Disclosure
3. Flowchart for Addressing Concerns
4. Guidance on Recognising Abuse
5. Recording Form for Safeguarding Concerns
6. Further guidance - allegations of abuse made against other children
7. Specific and Current Concerns
8. Low-level concerns against staff
9. Further Reading

Appendix 1: Key Persons

| Agency | Named Person | Role | Contact Details |
|--|--------------|--------------------------------------|--|
| Lewisham Safeguarding Children Partnership | | | Email: safeguardingpartnership@lewisham.gov.uk Telephone: 020 8314 3396 |
| Local Authority Designated Officer (LADO) | | | Telephone: 020 8314 3114 Email: LewishamLADO@lewisham.gov.uk |
| Multi-Agency Safeguarding Hub (MASH) | | | Telephone: 020 8314 6660 Email: mashagency@lewisham.gov.uk Out of hours: 020 8314 6000 |
| Lewisham PREVENT | | | Telephone: 07710 387 930 Email: prevent@lewisham.gov.uk |
| Holbeach Children’s Club Board of Trustees | Dave Hackin | Trustee Responsible for Safeguarding | Email: |

| | | | |
|--------------------------|--|-------------|-------------------------|
| | | | Telephone: 07908 714223 |
| Holbeach Children's Club | | DSL DDSL | Telephone: Email: |

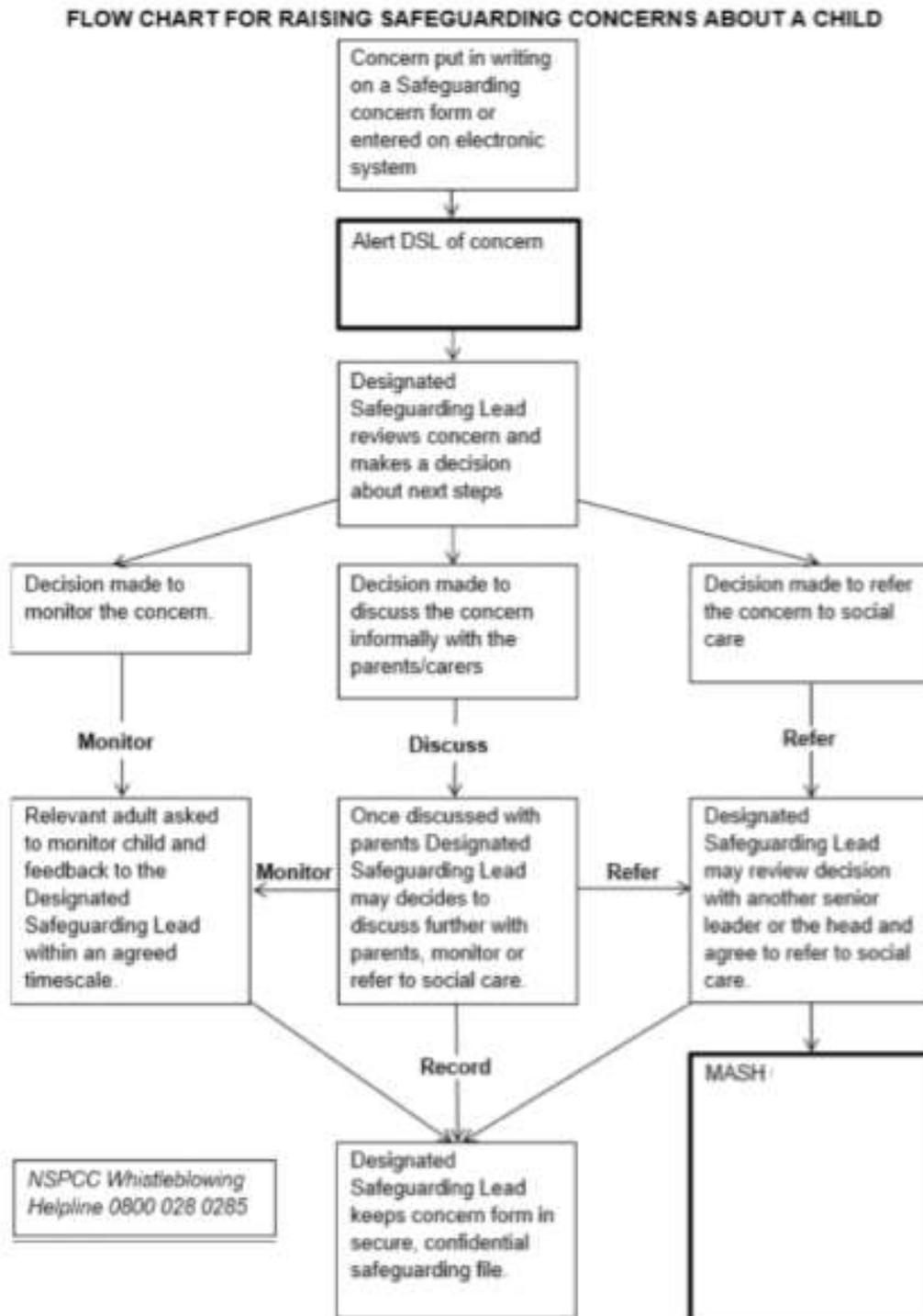
Appendix 2: When a Child Makes a Disclosure

Staff have an important role in hearing what children have to say. Holbeach Children's Club can provide a neutral place where the child feels that it is safe to talk. Sensitivity to any disclosure made is vital. Staff must listen carefully to what the child is saying, treat it seriously and value what is said. Children may feel that they will not be believed or that they will be punished. Staff should be prepared to reassure a child that whatever has happened is not their fault. It is crucial not to ask leading questions. The adult's role is to enable the child to speak, to listen and then know what to do next.

Information relating to a safeguarding disclosure should be treated as confidential and only passed to those who need to know for professional reasons. Adults must refrain from making any promises to children to keep their disclosure a secret, sensitively informing them that information might have to be shared with other professionals if there is a need to safeguard their interests. Any retraction of a possible disclosure at this point, or later, should be treated as concern and immediately reported to a designated person.

The presence of one or more factors does not necessarily give proof that child abuse has occurred, but it may indicate that further investigation should take place.

Appendix 3: Flowchart for Addressing Concerns



Appendix 4: Guidance on Recognising Abuse

Child abuse is a term used to describe ways in which children are harmed by someone who is usually in a position of power. It is not our responsibility to decide whether child abuse is occurring but we are required to act on any concerns and report them to the appropriate party. The health, safety and protection of a child is paramount.

PHYSICAL ABUSE

Physical abuse can include hitting, shaking, throwing, poisoning, burning, scalding, suffocating or causing any form of physical harm to a child. Possible signs include:

| | |
|---|----------------------------------|
| Refusal to discuss injuries | Fear of medical help |
| Improbable explanations of injuries | Aggression/ bullying |
| Untreated injuries or lingering illness | Overly-compliant behaviour |
| Disclosure of punishment which appears excessive | Running away |
| Shrinking from physical contact | Significant changes in behaviour |
| Fear of returning home or parents being contacted | Social withdrawal |
| Fear of undressing | Unexplained pattern of absence |

EMOTIONAL ABUSE

This is persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on a child’s emotional development. It can include:

- conveying to a child that they are worthless and unloved;
- placing inappropriate age-related expectations on children;
- making children feel frightened or in danger on a frequent basis.

Possible signs of emotional abuse include:

| | |
|---|---|
| Continual self-deprecation | ‘Neurotic’ behaviour – obsessive rocking, thumb-sucking |
| Fear of new situations | Air of detachment and ‘don’t care’ attitude |
| Inappropriate emotional responses to painful situations | Social isolation |
| Self-harm or mutilation | Attention-seeking behaviour |
| Compulsive stealing/ scrounging | Eating problems |
| Drug/ solvent abuse | Depression, withdrawal |

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. They can include non-contact activities such as involving children looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Possible signs include:

| | |
|---|--|
| Bruises, scratches, burns or bite marks | Attempts to teach other children about sexual activity |
| Scratches, abrasions or persistent infection in the anal or genital regions | Refusing to stay with certain people or go to certain places |
| Pregnancy | Aggression, anger, anxiety, tearfulness |
| Sexual awareness inappropriate to the child’s age | Withdrawal from friends |
| Frequent public masturbation | |

NEGLECT

Neglect is also a form of abuse. It is the persistent failure to meet a child’s basic physical and/or psychological needs and can affect the child’s health and development. It might include failure to provide adequate food, shelter and clothing, failure to protect a child from physical harm or danger, failure to ensure appropriate access to medical care and treatment.

Possible signs include:

| | |
|-------------------------------------|-----------------------------------|
| Constant hunger | Low self-esteem |
| Poor personal hygiene | Poor social relationships |
| Inappropriate clothing | Compulsive stealing or scrounging |
| Frequent lateness or non-attendance | Constant tiredness |
| Untreated medical problems | |

MENTAL HEALTH

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

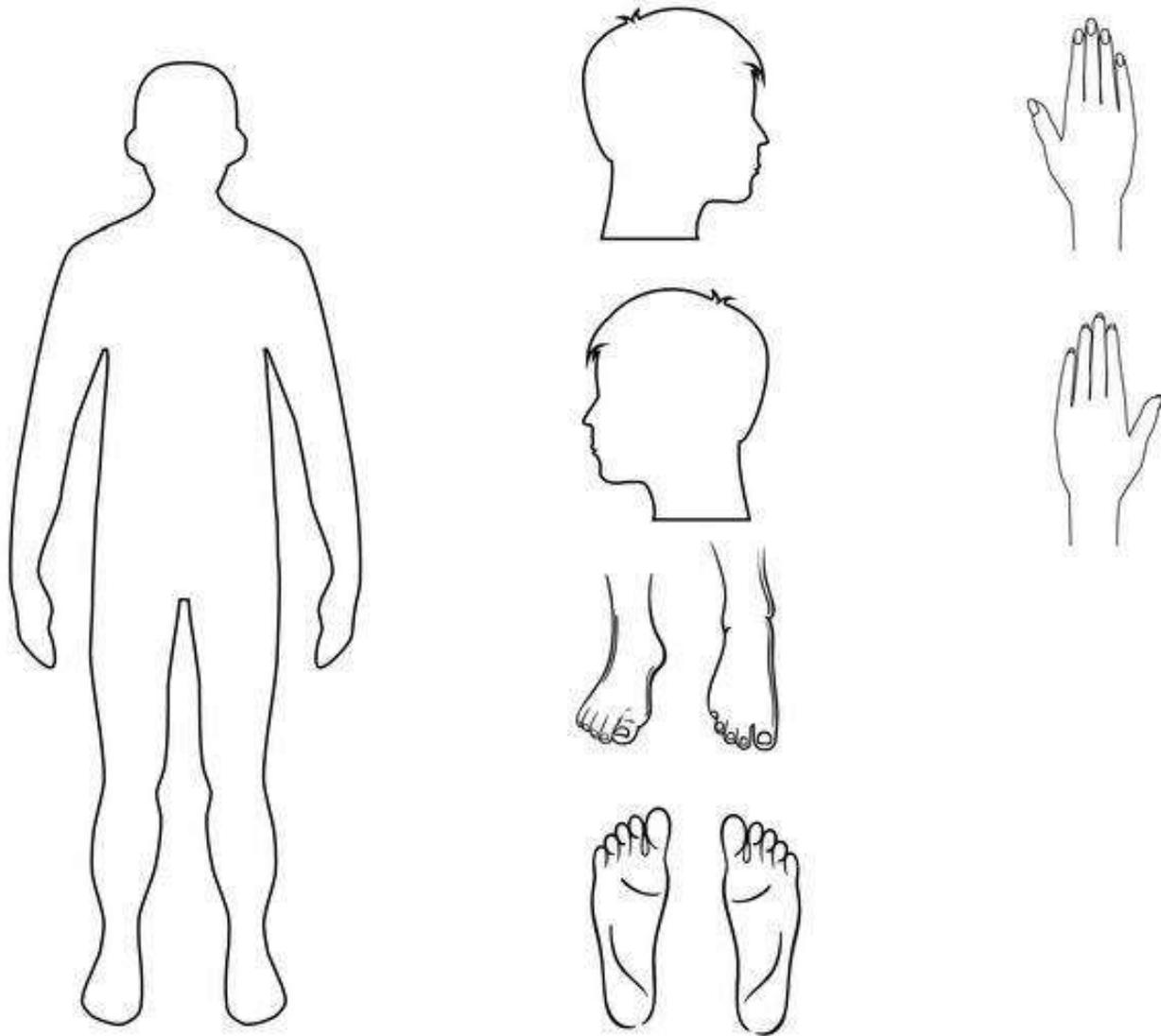
Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences can impact on their mental health, behaviour and education.

Appendix 5: Recording Form for Safeguarding Concerns

Staff, volunteers and regular visitors are required to complete this form and pass it to [ENTER NAME OF DSL] if they have a safeguarding concern about a child in our club.

| | | |
|---|-------|--|
| Holbeach Children’s Club Concern Form | | |
| FOCUS CHILD(S): | | Class: |
| NAME(S) PRESENT: | | |
| DATE: | TIME: | TYPE: Neglect Physical Sexual Emotional Online-safety Bullying Wellbeing/Mental Health Other (please specify): |
| Section A: NOTES ABOUT CONCERN: | | |
| Section B: To be completed by Designated Person Actions taken (incl. by whom and when): | | |
| Follow-up from actions: | | |
| Designated person’s signature: | | |
| Reporting person’s signature confirming receipt of feedback on concern: | | |

Body Map



Appendix 6: Further guidance - allegations of abuse made against other children

Occasionally, allegations may be made against children by others in the club, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a child, some of the following features will be found.

The allegation:

- is made against an older child and refers to their behaviour towards a younger or more vulnerable child
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other children in the club
- indicates that other children may have been affected by this child
- indicates that young people outside the club may be affected by this child

Examples of safeguarding issues against a child could include:

Physical Abuse

- violence, particularly pre-planned
- forcing others to use drugs or alcohol

Emotional Abuse

- blackmail or extortion
- threats and intimidation

Sexual Abuse

- indecent exposure, indecent touching or serious sexual assaults
- forcing others to watch pornography
- consensual and non-consensual sharing of nude and semi-nude images and/or videos

Sexual Exploitation

- encouraging other children to attend inappropriate parties
- photographing or videoing other children performing indecent acts

In areas where gangs are prevalent, older children may attempt to recruit younger children using any or all of the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- online harassment including upskirting

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap;

they can occur online and face to face (both physically and verbally) and are never acceptable. All staff working with children are advised to maintain an attitude of 'it could happen here'.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

But it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Minimising the risk of safeguarding concerns towards children from other children

On occasion, some children will present a safeguarding risk to other children. The club should be informed that the young person raises safeguarding concerns, for example, if they have experienced serious abuse themselves.

These children might need an individual risk management plan to ensure that other children are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding. On review, it may alternatively be deemed necessary by the Manager for the child to be excluded from the club, in accordance with the HCC Suspension and Exclusions Policy.

What to do

When an allegation is made by a child against another child, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the Designated Safeguarding Lead (DSL) should be informed.

A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

The DSL should contact social services to discuss the case. It is possible that social services are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a social services referral where appropriate.

The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both children's files.

If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the child being complained about and the alleged victim).

It may be appropriate to exclude the child being complained about for a period of time according to the club's Suspension and Exclusions Policy.

Where neither social services nor the police accept the complaint, a thorough internal investigation should take place into the matter using the club's usual disciplinary procedures.

In situations where the club considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan. Again, if based on this risk assessment it is proved necessary, the child could be excluded from participation in the club on a longer-term or permanent basis in line with the club's Suspension and Exclusions Policy.

Any supervision plans should be monitored and a date set for a follow-up evaluation with all concerned parties involved.

Unsubstantiated, unfounded, false or malicious reports

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the club should consider whether any disciplinary action is appropriate against the individual who made it as per the HCCC Behaviour policy.

Appendix 7: Specific and Current Concerns

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child 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.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE involves exploitative situations context and relationships where young people receive something e.g. food, drugs, alcohol, affection, gifts or money as a result of them performing and/or another/or others performing on them sexual activities. Child sexual exploitation can occur through the use of technology – internet or mobile phones – this may be with or without the child's immediate recognition, for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain.

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, school and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs.

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Extremism and Radicalisation

We will help support children who may be vulnerable to such influences as part of our wider safeguarding responsibilities. In such instances our club will seek external support from the Local Authority and/or local partnership structures working to prevent extremism.

However, staff at this club will be alert to the fact that whilst extremism and radicalisation is broadly a safeguarding issue there may be some instances where a child or children may be at direct risk of harm or neglect. For example; this could be due to a child displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with or staff may be aware of information about a child's family that may equally place a child at risk of harm. (These examples are for illustration and are not definitive or exhaustive)

Therefore, all adults working in this club (including visiting staff, volunteers and contractors) are required to report instances where they believe a child may be at risk of harm or neglect to the Designated Safeguarding Lead, including any harm through extremism or radicalisation.

Female Genital Mutilation (FGM)

All staff need to be alert to the possibility of a girl being at risk of FGM or already has suffered FGM. There are a range of possible indicators that a child or young person may be a risk of FGM, they are likely to come from a community who are known to practice FGM but may not be aware this practice takes place.

Staff will immediately report to the DSL and ultimately the police on 101 if they have information about FGM. In an emergency, they will dial 999.

Online Safety and Social Networking

We recognise that there are risks involved for both children and staff when using the internet and social networking sites. Holbeach Children's Club has separate policies for Online Safety and Social Networking and Media.

Children may have their photographs taken from time-to-time as part of club activities but this should only be undertaken with the express permission of parents and carers. Staff, visitors, volunteers and Trustees are not permitted to use their own mobile devices to take or record any images of children without the prior consent of the Manager.

Peer-On-Peer Abuse

Abusive behaviour can happen to children in this setting and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.

Peer abuse is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Equally, abuse issues can sometimes be gender specific e.g. girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence. It is important to consider the forms abuse may take and the subsequent actions required. There are different forms peer-on-peer abuse which can take, such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;

- 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 standalone 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;

Upskirting is a criminal offence in England and Wales with offenders facing up to two years in prison for taking an image or video under somebody's clothing. It is usually performed in a public place, such as on public transport or in a nightclub, among crowds of people, making it harder to spot people taking the photos and there have also been instances of the practice taking place in schools.

- 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)

Staff should consider the seriousness of the case and make a quick decision whether to inform the Designated Safeguarding Lead immediately before taking any further actions.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of the Local Authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half siblings and step parents; it does not include great aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant Local Authority at least 6 weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the Local Authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Club staff should notify the designated safeguarding lead when they become aware of a private fostering arrangement. Having informed the family of his or her intentions, the designated safeguarding lead will then inform the Local Authority of the private fostering arrangements.

Self-Harm

If it comes to the attention of a member of staff that a child is self-harming, they should immediately alert the DSL. Staff should discuss any concerns with the MASH team before contacting parents/carers. Actions by the DSL might include:

- contacting parents
- referring to Social Care if the child meets the referral criteria

Serious Youth Violence/Violent Crime

There are a number of areas in which young people are put at risk by gang activity, both through participation in and as victims of gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect. The indicators that may signal that children are at risk from, or are involved with, serious violent crime include:

- Unexplained gifts/new possessions - these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

Staff should make themselves aware of the associated risks and understand the measures in place to manage them. There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further guidance can be found on the [London Safeguarding Children Board's Website](#).

Appendix 8: Low-level concerns against staff

What is a low-level concern?

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in the club may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring that they are dealt with effectively should also protect those working in or on behalf of the club from potential false allegations or misunderstandings.

Sharing low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractors should be reported to the DSL or the Trustee with Responsibility for Safeguarding if the concern relates to the DSL. Reports about supply staff and contractors should be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

Recording low-level concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the club should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the club which enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

It is for the club to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

Appendix 9: Further Reading

Key Documents

ALL STAFF MUST READ DOCUMENTS 1 and 2

1. Working Together to Safeguard Children
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
2. What to do if you're worried a child is being abused
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Key Organisations

Lewisham Safeguarding Children Partnership: <https://www.safeguardinglewisham.org.uk>

The Children's Commissioner: <http://www.childrenscommissioner.gov.uk/>

NSPCC: <https://www.nspcc.org.uk/>

London Safeguarding Children Board: <http://www.londonscb.gov.uk/>

London Child Protection Procedures: <http://www.londoncp.co.uk/>