

Solace Partnerships


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Policy owner: Andrew Goff (Director of Solace Partnerships)

Approval of Policy made by: 
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Chapter One

Important Information

Director on call:

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Deputy Safeguarding Lead:

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Children's Advice and Duty Service

If you are a professional - for example, working with a child or young person in a formal or voluntary setting and you are not a family member or member of the public - you can contact the Children's Advice and Duty Service on their direct line: **0344 800 8021**.

If you are a member of the public, you can do this through Norfolk County Council's Customer Services on **0344 800 8020**.

For any call raising concerns about a child, the Children's Advice and Duty Service will ask for:

- all the details known to you/your agency about the child.
- their family composition including siblings, and where possible extended family members and anyone important in the child's life.
- the nature of the concern and how immediate it is.
- Any and what kind of work/support you have provided to the child or family to date.

Emergency Duty Team (EDT)

(EDT) deals with social care emergencies outside office hours involving children **0344 800 8020**

The Police

Call 999 if the child is at immediate risk of harm. If staff know that a child is in danger the Police must be called. All staff notifying the Police must inform the DSL/senior On-Call immediately. Accurate records must be taken using a **DETAIL RECORD SHEET** (Detailed Record Sheet).

Chapter Two

SAFEGUARDING CHILDREN POLICY & PROCEDURES

Safeguarding Statement

ALG Social Work Ltd trading as Solace Partnerships, herein after known as Solace Partnerships in this document, believes that a child should never experience abuse of any kind. We, as a company, have a responsibility to promote the welfare of all children, young people and adults that come into contact with our services, and to keep them safe. We are committed to practice in a way that protects them.

Safeguarding is the responsibility of all staff, including the Directors, paid staff, volunteers, sessional workers, agency staff, students, or anyone working on behalf of, or representing Solace Partnerships. The policy is provided to all staff (including temporary staff and volunteers) enclosed with their offer letter alongside our Staff Code of Conduct.

This policy is available on the Solace Partnerships website, and in printed form on request. We inform young people, parents and carers about this policy at induction or first contact with our service.

Solace Partnerships ethos on safeguarding

Solace Partnerships believes that a child, young person or adult should never experience abuse of any kind. We have a responsibility to promote the welfare of all children, young people and adults that come into contact with our services, and to keep them safe. We are committed to practice in a way that protects them.

We have taken the emphasis of ‘children have said that they need’ within Working Together to Safeguard Children (2018) and used this to inform our approach to safeguarding children and young people.

Staff and volunteers are expected to ensure:

- **Vigilance:** To notice when things are troubling children.
- **Understanding and Action:** Children and young people are supported to understand what is happening. They are heard and understood and to have that acted upon.
- **Stability:** To develop an on-going stable relationship of trust.
- **Respect:** Children and young people are treated as competent rather than not competent.
- **Information and Engagement:** Children and young people are informed about and involved in procedures, decisions, concerns and plans.
- **Explanation:** Children and young people are informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response.

- **Support:** Children and young people are provided with support “in their own right;”
- **Advocacy:** Children and young people are provided with or given help to find advocacy to help them to offer their views.
- **Protection:** Children and young people are protected against all forms of abuse and discrimination.

We recognise that:

- The welfare of the child/young person/vulnerable adult is paramount and regardless of age, disability, gender, racial heritage, religious belief, or sexual orientation/identity, have the right to equal protection from all types of harm or abuse.
- Some children, young people and vulnerable adults, are additionally vulnerable because of their level of dependency or their communication needs.
- Working in partnership with children, young people, vulnerable adults, their parents, carers and other agencies is essential in promoting welfare.
- Safeguarding work can be upsetting, challenging and uncomfortable. It is also an absolute privilege to work in a safe, professional and supportive environment with children, young people and families and this is what drives us all to demonstrate safeguarding excellence and activities. Therefore, we understand the need for emotional support for our staff, as well as those who we work alongside.

It is important to clarify the difference between the actions staff must undertake concerning children up to the age of eighteen years (Children’s Services); and adults of eighteen to twenty-five years (Adult Services). See safeguarding adult’s policy.

In England “a child is anyone who has not yet reached their eighteenth birthday.” This age limit is then where different actions are required for different groups (i.e. Children’s Services and Adult Services respectively), this will be clarified accordingly.

Adult Safeguarding - Young People Aged eighteen to twenty-five Years

In most cases, adult safeguarding procedures must be implemented for young people aged eighteen years and above. However, for young people in transition between Children’s Services and Adult Services, Children’s Safeguarding Services must be treated as active, equal partners – despite the young person reaching the age of eighteen years. This is to ensure that any issues that impact upon both adult and Children’s Services can be identified, addressed and monitored.

It is also important for staff to understand that some young people may have their entitlement to services extended beyond the age of eighteen and into adulthood. The Children (Leaving Care) Act 2000 states that Solace Safeguarding Policy

local authorities in England and Wales must keep in touch with care leavers until they are at least twenty-five years of age. Additionally, local authorities should assist with Education, Employment and Training (ETE) for Children leaving care until they are twenty-five. Young people with Learning Disabilities, such as those identified within an Education, Health and Care Plan (EHCP), may also continue to be supported by Children's Services after they reach the age of eighteen.

The purpose of our safeguarding policy is:

- To protect children, young people and vulnerable adults who receive a service from Solace Partnerships in the community and elsewhere where our company may be present.
- Predominantly in our living units, which focus on unaccompanied asylum seekers.
- To provide staff and volunteers with the overarching principles which guide our approach to safeguarding.

Legal Framework

This policy has been drawn up on the basis of law and guidance including (but not exclusively):

- Children Act 1989 and 2004
- Sexual Offences Acts 2003
- Protection of Vulnerable Adults Act 2007
- Protection of Freedoms Act 2012.
- Working Together 2018

Please see Appendix 2.

In addition to this policy, staff and volunteers are expected to familiarise themselves with individual safeguarding policies that are available for specific areas of concern.

These include our:

- *Complaints Policy*
- *Countering Bullying Policy*
- *Health and Safety Policy*
- *Lone Working Policy*
- *Missing from Care Policy*
- *Safe Recruitment Policy*
- *Whistleblowing Policy*

The above list is not exhaustive and other policies are available.

Chapter Three

Designated Safeguarding Lead

The Director or lead professional within each setting must be informed of all concerns, issues or incidents regarding young people accessing our supported accommodation services and report these immediately to the DSL.

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL.

The DSL has an unequivocal duty to notify a Director in charge of safeguarding of any serious concerns.

What does the DSL do?

The purpose of the DSL is to lead in ensuring that appropriate arrangements for keeping children and young people safe are in place. The DSL has a responsibility to promote the safety and welfare of children and young people involved in the provision's activities at all times.

What are the DSL's main duties and responsibilities?

The DSL must:

- Ensure that everyone working or volunteering with or for children and young people understands the safeguarding and child protection policy and procedures, and understands what to do if they have concerns about a child's welfare.
- Ensure children and young people who access our care know who they can talk to if they have a welfare concern and understand what action the organisation will take in response.
- Receive and record information from anyone who has concerns about a child or young person.
- Be familiar with and work within inter-agency child protection procedures developed by the local child protection agencies (i.e. the Local Safeguarding Partnership and the Local Authority Designated Officer (LADO) for example).
- Be familiar with issues relating to child protection and abuse, keeping up to date with new developments in this area.
- Attend regular training in issues relevant to child safeguarding and share knowledge from that training with everyone who works or volunteers with or for children and young people at the home, and throughout the organisation.
- The DSL will always seek to ensure that we work together to protect children and young people, the DSL must inform relevant colleagues.

Chapter Four

Dealing with a Disclosure

Our work brings us into contact with a wide range of children. Sometimes these individuals will raise issues with you or disclose information to you. This can be done overtly, for instance a child asking you for a chat and telling you something is worrying them, or more covertly, for instance something crops up in a conversation which could be taken as a disclosure or allegation of abuse.

As a staff member, remember the below advice when dealing with a disclosure:

- Listen carefully and considerately.
- Do not judge; take a breath and consider your body language.
- If the child/young person/adult asks that you keep the information they are sharing confidential remind them that you are unable to do this if you think they are at risk of or being harmed.
- Encourage the child/young person/adult to talk freely without probing or asking leading questions. Good questions include things like ‘Tell me about it’, ‘What happened?’ ‘When did this happen?’ ‘Who did that?’

The type of questions to avoid include those like ‘Did he touch you then?’, ‘Your Mum beats you?’ as these assume knowledge of events and can be considered ‘leading’.

- Reassure them you have taken their disclosure seriously and arrange a time for you to talk again. Reassure the child/young person/adult that you will be there for them to help them seek the appropriate next level of support (if required).
- Tell the person what you are going to do. It is always important to inform the person what will happen, who you will talk to and when. The choice not to inform them of next steps should only happen in exceptional circumstances where this would increase risk of harm.

Process if you are disclosed to:

- If you feel the child/young person/vulnerable adult is at risk of harm or has been harmed it is your duty to inform the relevant authorities. As soon as possible make a record of the disclosure using a safeguarding log sheet and discuss this with the nominated Designated Safeguarding Lead. See the important information page to find more information regarding who to contact.
- You must discuss your concerns with the Director or DSL.

- This will be followed up with a call to the local Children’s Advice and Duty in Norfolk Service (known as the CADS); the phone number can be found in the Safeguarding Directory. **0344 800 8021**
- CADS acts as the first point of contact, receiving new safeguarding concerns or enquiries relating to:
 - Child Abuse referral
 - Domestic Abuse safeguarding
 - Child Sexual Exploitation (CSE)
 - Missing person coordination
 - Child Criminal Exploitation (CCE)
 - Honour Based Abuse (HBA) & Female Genital Mutilation (FGM) Investigation
 - In some services it may be appropriate to call the Children’s Services Emergency Duty Teams/Emergency Duty Service. The Director or DSL will give you details of the relevant team.
 - Keep careful notes – including a timeline/chronology of events - of any further conversations you have with the vulnerable person, and a record of any calls you make to the CADS team or other professionals involved in the case.
 - Store all notes you make securely and safely as they may be needed if the case goes further, this includes informal notes made on notepads, backs of envelopes etc. **(Please refer to safe storage policy/GDPR)**

If you receive the disclosure out of hours or you feel the vulnerable person is in immediate danger, then you must call 999 and request police support and advise emergency duty team. You are only expected to make contact with the police if the child is in immediate danger or a crime is being committed at that point – in any other event please liaise with the on-call director.

Staff and Disclosures

Ensure when dealing with a disclosure you do not underestimate the effects that dealing with a disclosure may have on your own well-being.

Solace Partnerships is committed to providing additional support to staff and volunteers who are involved in supporting children, young people and vulnerable adults involved in safeguarding cases and will arrange external professional support if required.

During an Investigation

Whenever there are concerns of a child protection nature that involves suitability to work with children, Solace Partnerships have an unequivocal duty to inform the Local Authority Designated Officer (LADO). If a criminality is suspected or disclosed, Solace Partnerships have a duty to inform the Police.

Chapter Five

Dealing with Suspected Abuse

In our work with children, young people and vulnerable adults we must be alert for signs of abuse in our service users.

You may suspect a child you are working with is being abused for a number of reasons.

These may include:

- Regularly experiencing nightmares or sleeping problems. Changes in personality.
- Outbursts of anger.
- Changes in eating habits.
- A lack of self-care, for example, not washing, dirty clothes, and defecating and urinating in their room, instead of using the facilities.
- Showing an inexplicable fear of particular places or making excuses to avoid particular people.
- You may notice that a child, young person or adult is gifted presents, money, drugs or alcohol etc.
- Self-harming (includes, but is not limited to: head banging, scratching, cutting)
- Not receiving adequate medical attention after injuries.
- Showing violence to animals, toys, peers or adults.
- Age-inappropriate knowledge of 'adult issues e.g. alcohol, drugs, sexual behaviour.
- Lacking in confidence or often wary/anxious.
- Regressing to the behaviour of younger children.
- Regular flinching in response to sudden but harmless actions, e.g. Someone raising a hand quickly.
- Signs of injury not easily explained or consistent with activities the child/young person/vulnerable adult partakes in.

This is not a definitive list, and contraindications must be considered. If you feel concerned, please talk to your DSL.

Please refer to the following more detailed paper on signs of abuse published by the NSPCC:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

It is important that you use your intuition and judgement and raise any concerns you might have about a child or vulnerable person you are working with. Just the smallest piece of information could be significant in helping to support a person in an abusive situation.

Please refer to dealing with a disclosure to access advice to use.

Remember, if you have concerns out of hours or you feel the vulnerable person is in immediate danger, then you must call 999 and request police support.

It is important to understand the different types of abuse: (these definitions are provided by working together)

Abuse may fall into one of the categories detailed below (although this is not an exclusive list):

Physical: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional: The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Neglect: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- a. Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- b. Protect a child from physical and emotional harm or danger;
- c. Ensure adequate supervision (including the use of inadequate care-givers);
- d. Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Sexual: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may

involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Other types of harm include: (these are not defined by working together)

Honour based abuse: Honour based violence and abuse can take many forms, e.g. threatening behaviour, assault, rape, kidnap, abduction, forced abortion, threats to kill and false imprisonment committed due to so called 'honour'. Murders/violence in the name of 'so-called' honour, is abuse in which predominantly women are hurt/killed for actual or perceived immoral behaviour which is deemed to have brought shame on the family.

Online abuse: Online abuse can be where children, young people and vulnerable adults are incited to share sexual images, perform sexual acts themselves or with others, harm themselves, such as cutting, starvation or ligatures or other ways to commit suicide after bullying or blackmail.

For more information visit: <https://www.ceop.police.uk/safety-centre/>

For further guidance there are many useful publications on the following websites, which are updated regularly:

Norfolk Children Children Partnership: <https://www.norfolkscb.org/> Children's Board:
<http://www.suffolkscb.org.uk/>

Chapter Six

Dealing with Alleged Perpetrators of Abuse

The work of Solace Partnerships can bring us into contact with those we suspect of abusing another. If you are working with somebody that you suspect of abusing a child - then you must apply the same level of professional judgement and act as you do when you work with victims (or possible victims) of abuse. If you have suspicions abuse is taking place protect yourself. Do not challenge the alleged perpetrator or attempt to investigate the abuse yourself.

Advice to recall when dealing with alleged perpetrators:

- Withhold judgement. Many perpetrators of abuse can also be victims of abuse and/or vulnerable themselves and may need on-going support.
- Tell the person what you are going to do. It is always important to inform the person what will happen, who you will talk to and when. The choice not to inform them of next steps should only happen in exceptional circumstances where this would increase risk of harm or undermine any criminal investigation.
- Make a record of your concerns using the safeguarding protection log sheet appropriate to your service.

As soon as possible discuss this with the nominated lead person (referred to as a Designated Safeguarding Lead/DSL throughout this policy) for your service.

If you feel abuse has taken place or is highly likely to take place, then it is your duty to inform the relevant authorities. Normally this starts with a call to the local Children's Advice and Duty Service (known as the CADS); the phone number can be found in the Safeguarding Directory.

If the person you suspect of being an abuser works in a paid or voluntary capacity with children/vulnerable people (or is seeking to work in this capacity) then you must contact the Local Area Designated Officer (LADO); contact details can be found in the Safeguarding Directory. This is always discussed with the DSL

If your concerns become apparent out of hours or you feel a vulnerable person is in immediate danger, then you must call 999 and request immediate police support.

Chapter Seven

Allegations or Disclosures indicating a Child has Harmed another Child

Allegations or disclosures indicating a child has harmed another child is commonly referred to as “Peer on Peer Abuse.” Staff should know the different forms “peer-on-peer” abuse can take, including bullying, sexting and relationship abuse for example.

Staff should know that:

- Abuse to and by children accessing our services is wrong and will be taken seriously.
- The needs of both the victim and perpetrator should be fully considered.
- Abuse to and by children can occur in all settings, including supported accommodation.

Action following a concern that a young person is harming (or has harmed) another young person is as such:

1. Where abuse by another young person is suspected, alleged and or witnessed, staff must immediately inform the Director or DSL, who will advise the young person’s social worker(s) if they have one, (and/or the EDT Team if after hours) and contact CADS and the local Police.
2. The above agencies will advise on:
 0. How the immediate circumstances are to be managed.
 1. Reach agreement about ensuring that each young person’s safety is secured.
 2. When and who should action any investigation.
 3. Arrangements for the convening of a strategy meeting.
3. If an allegation is made the alleged abuser must not be approached before taking advice from actions as in (1) & (2)
4. During (1) identify who is to provide support for each young person involved.
5. Consider the safety of other young people and what, if any, immediate action may be necessary to protect them.

Discussions must take place, decisions made and agreed regarding any immediate arrangements for protecting each person involved.

Chapter Eight

Other types of harm including Bullying (Including Cyberbullying) (Staff Procedures)

Immediate action should be taken to protect young people subject to bullying or involved in bullying. In some cases, a strategy meeting will be convened to discuss a plan of action.

Solace Partnerships staff will ensure that an action plan to protect the young person from further bullying is in place. This will be produced in consultation with the young person and any other relevant people (such as the Designated Teacher from the young person's college for example). The action plan should be completed prior to the strategy meeting and such a plan must be endorsed by those with legal responsibility.

The Director must ensure that:

- Any vulnerabilities and risks associated with bullying are recorded in each person's Safety Plan.
- The Bullying Incident Register is maintained and checked for accuracy every month.
- All incidents or alleged incidents of bullying are recorded in detail.
- All members of staff are made aware of any concerns around bullying.
- The service maintains a "zero tolerance ethos" regarding bullying, whether relating to young people, staff or adults and children visiting the accommodation.

All Staff Will:

- Support young people to act against cyberbullying and empower them to raise any concerns they may have about themselves, their peers, etc.
- Be familiar with the conditions of each person's Safety Plan, which will identify any vulnerabilities and risks associated with bullying.
- Follow the Anti-Bullying Policy if they are alerted to instances of bullying.
- Register if there is a bullying incident.
- Understand that a bullying incident should be addressed as a safeguarding concern when there is 'reasonable cause to suspect that a person is suffering, or is likely to suffer, significant harm.'

Bullying can take many forms including:

- There is no legal definition of bullying. It is usually defined as repeated behaviour which is intended to hurt someone either emotionally or physically.

- Bullying is often aimed at certain people because of their race, religion, gender or sexual orientation or any other aspect such as appearance or disability.
- Emotional abuse may involve serious bullying (including cyber bullying), causing children to feel frightened or in danger, or the exploitation or corruption of vulnerable children.

Cyber – Abuse on-line or via text message; interfering with electronic files; setting up inappropriate websites; inappropriate sharing of images, etc.; interfering with e-mail accounts.

Faith-based – Negative stereotyping; name-calling/ridiculing based upon religious persuasion/identity.

Gifted and Talented – Name-calling, innuendo or negative peer pressure based on high levels of ability or effort; ostracism resulting from perceptions of high levels of ability.

Homophobic or Transgender – Name-calling, innuendo or negative stereotyping based on sexual orientation or perceived sexual orientation, use of homophobic language.

Physical – Kicking or hitting; prodding, pushing or spitting; offensive gestures or intimidating behaviour; damaging or removing property; invasion of personal space; extortion; coercion; other forms of persistent physical assault.

Racist – Physical, verbal, written, on-line or text abuse; ridicule based on differences of race, colour, ethnicity, nationality, culture or language; refusal to co-operate with others based upon any of the above differences; stereotyping because colour, race, ethnicity, etc.; promoting offensive materials such as racist leaflets, magazines or computer software.

Sexist – Use of sexist language; negative stereotyping based on gender.

Sexual – Unwanted/inappropriate physical contact; sexual innuendo; suggestive propositioning, distribution/display of pornographic material aimed at an individual; graffiti with sexual content aimed at an individual. Putting pressure upon someone to act in a sexual way.

Special Educational Needs or Disability – Name-calling, innuendo or negative stereotyping based on disability or learning difficulties; excluding from activity because of disability or learning difficulty.

Verbal – Threats or taunts; shunning/ostracism; name-calling/verbal abuse; innuendo; spreading of rumours; glaring; making inappropriate comments in relation to appearance.

- Inappropriate Material

One of the key risks of using the internet, email or chatrooms is that children may be exposed to inappropriate or illegal material. This may be material that is pornographic, hateful or violent in nature; that encourages activities that are dangerous or illegal; or that is just age-inappropriate or biased. One of the key benefits of the web is that it is open to all, but unfortunately this also means that those with extreme political, racist or sexual views can spread their distorted version of the world to vulnerable and impressionable individuals.

- Physical Danger

The threat of physical danger is one of the most worrying and extreme risk associated with the use of the internet and other technologies. A criminal minority make use of the internet and chatrooms to contact children with the intention of developing relationships which they can progress to sexual activity or other forms of criminality. Paedophiles will often target children, posing as a child with similar interests and hobbies to establish an online 'friendship'. These relationships may develop to a point where the paedophile has gained enough trust to meet in person. These techniques are often known as 'online enticement', 'grooming' or 'child procurement'.

Significant Areas of Concern

The list below comprises a general summary of significant areas of concern relating to internet use, images and online exploitation:

- Internet “grooming” by sexual predators via social media, such as Facebook or Twitter, as well as chat rooms and forums for example.
- Accessing inappropriate websites, such as those containing violence or pornography for example.
- Cyber-bullying, which refers to bullying via social media.
- Cyber-stalking, which is covertly tracking or following an individual, usually to gain personal information.
- Exploitation and manipulation, which refers to encouraging vulnerable people to behave in a way that is not appropriate or illegal.
- Reputational damage, such as uploading materials that could be considered as embarrassing or regretful in the future.
- Radicalisation and extremism, which has become an increasingly powerful way to disseminate unacceptable propaganda and ideology (such as that consistent with advocating terrorism for example).

Internet harm:

Sexting

The ever-increasing use of social media by children and young people continues to increase the risks presented. This is a particular issue/concern regarding vulnerable children and young people.

Sexting is an area of significant concern. It is linked to bullying, blackmail and exploitation, as well as being linked to other forms of harm:

- Unwanted attention Images posted online can attract the attention of sex offenders, who know how to search for, collect and modify images.
- Feeling profoundly embarrassed and humiliated. If they're very distressed this could lead to suicide or self-harm.

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages. Sexting may also be called “trading nudes,” “dirties” and/or “pic-for-pic.”

It's easy to send a photo or message, but the sender has no control about how it's passed on. When images are stored or shared online, they become public. Some people may think that images and videos only last a few seconds on social media and then they're deleted, but they can still be saved or copied by others. This means that photos or videos which a child or young person may have shared privately, could still end up being shared with people they don't know.

Screen The Law: Indecent Images of Children (Under eighteen)

The following information clarifies the legal position regarding indecent images of children. Indecent photographs of children:

- Under the Protection of Children Act 1978 (as amended), the UK has a strict prohibition on the taking, making, circulation, and possession with a view to distribution of any indecent photograph or pseudo photograph of a child and such offences carry a maximum sentence of 10 years' imprisonment.
- Section 160 of the Criminal Justice Act 1988 also makes the simple possession of indecent photographs or pseudo photographs of children an offence and carries a maximum sentence of 5 years' imprisonment.

There are defences for those aged over the age of consent (16) who produce sexual photographs for their own use within a marriage or civil partnership. These defences are lost if such images are distributed.

The term ‘making’ could include:

- Opening an attachment to an email containing an image.
- Downloading an image from a website onto a computer screen.
- Storing an image in a directory on a computer.
- Accessing a website in which images appeared by way of an automatic “pop up” mechanism.

Types of examples covered by these laws could include the following:

- A person under the age of eighteen who creates, possesses and/or shares sexual imagery of themselves with a peer under the age of eighteen or adult over eighteen.
- A person under the age of eighteen who possesses and/or shares sexual imagery created by another person under the age of eighteen with a peer under the age of eighteen or an adult over eighteen.
- A person over the age of eighteen who creates, possesses and/or shares sexual imagery of a child.

Internet Watch Foundation – an independent charity that aims to help victims of child sexual abuse worldwide by identifying and removing online sexual imagery.

- Under eighteens, offering a place for the public to report suspected indecent images of children anonymously.
- Marie Collins Foundation – a charity enabling children who have suffered sexual abuse and exploitation online to recover and live safe, fulfilling lives.
- National Crime Agency CEOP – a command of the NCA working with child protection partners across the UK to identify and eradicate threats to children.
- NSPCC – a charity working to protect children and prevent abuse.
- Stop It Now! – a child abuse prevention campaign and anonymous helpline for individuals worried about their own sexual thoughts or behaviour towards children or that of others.

The scope for benefiting from the use of computers is enormous, but we are constantly mindful that there are inherent dangers in using computers that are severe and profound.

Young people and staff are encouraged to use and enjoy computing resources, but this is subject to clear expectations of conduct. The internet has revolutionised the way we live our lives and can be used as a

wonderful resource. However, access to the internet is as dangerous as it is beneficial, as well as being particularly hazardous for vulnerable young people.

Staff must be vigilant to the dangers of potentially criminal online abuse and cyber-bullying. The following provides staff with important information about protecting young people from potential online abuse and providing them with the support required to keep them safe and make positive choices.

All staff must take reasonable steps to:

- Ensure that young people are not exposed to unsuitable material on the internet.
- Make time to explore and discuss the online world together.
- Talk with young people about staying safe online.
- Follow Safety Plans and guidelines regarding known restrictions.
- Agree rules with young people, from the onset, about what's okay and what's not okay.
- Ensure that young people requiring support when accessing the internet through Solace Partnerships computer systems are monitored;
- Ensure that information relating to specific risks to individual young people are recorded and detailed record in the Safety Plan. This must be reviewed every month for accuracy and relevance.
- Raise any concerns regarding inappropriate internet use with the DSL immediately.
- Record all allegations, disclosures and concerns relating to internet use using a **DETAIL RECORD SHEET**.

The Internet & Staff Conduct

FACT: There are no circumstances that will justify adults possessing indecent images of children or young people, specifically those aged below the age of eighteen years.

Adults who access and possess links to such websites will be viewed as a significant and potential threat to young people in our accommodation. Accessing, making and storing indecent images of children (under the age of eighteen is illegal). This will lead to criminal investigation and the individual being barred from working with children or young people if proven.

Where indecent images of children or other unsuitable material are found, the police and Local Authority Designated Officer (LADO) will be immediately informed. Staff must not attempt to investigate the matter or evaluate the material. This may lead to evidence being contaminated, leading to a criminal prosecution.

Therefore, staff must:

- Ensure they keep data safe and secure.
- Always conduct themselves professionally online.
- Never take pictures of young people without their permission and the authorisation of the manager or deputy manager (or On-call if the manager or deputy manager are not available).
- Never view or possess inappropriate or indecent images of young people. If a young person discloses or alleges a concern, do not encourage the young person to show [you] the image. A description will be adequate, and the device will need to be handed over to the Police. Additionally, the gender of the young person should be a serious consideration. For example, a female young person making a disclosure will likely feel more at ease with a female member of staff.
- Not allow young people to access to their data through social networking sites such as Facebook (Staff are advised to decline “friend requests” from children as this is not appropriate).
- Not place details of their place of work on their social networking profiles. This means referring to their job as “working in a social services organisation” or ideally, as “not disclosed”.
- Inform a senior member of staff of any issues of concern.
- Report any illegal or suspicious internet activity to the Police.

Staff must never:

- Display or distribute images of young people unless they have consent to do so.
- Use images which may cause distress.
- Use mobile telephones or any other similar devices to take images of young people.
- Take images ‘in secret’ or taking images in situations that may be construed as being secretive.

Staff will be expected to:

- To justify images of young people in their possession in no uncertain terms.
- Online exploitation is when an individual or group use online platforms to take advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of eighteen into sexual and/or criminal activity that can occur online and offline.
- NOTE: All disclosures must be escalated to the DSL without delay.
- Where there are immediate concerns, CADS will be contacted and informed of the disclosure. If it is believed a criminal act has taken place, the Police must be called.
- Our role – the role of staff – is to protect young people accessing our support from potential harm. We can do this by actively listening to young people, talking openly about the risks and by developing a preventative approach that builds young people’s knowledge and skills so that they are well supported to keep themselves safe as they into adulthood.

- As consistently reiterated throughout this policy, the need to share information with pertinent professionals and secure effective collaborative practice is essential. This means regular contact with education providers, partnership working with relevant agencies and maintaining a consistency of approach.

Chapter Nine

Female Genital Mutilation and Child Trafficking Female Genital Mutilation (FGM)

Note: This section contains graphic descriptions of FGM.

FGM is illegal in the UK. In England, Wales and Northern Ireland, civil and criminal legislation on FGM is contained in the Female Genital Mutilation Act 2003 (the act). In Scotland, FGM legislation is contained in the Prohibition of Female Genital Mutilation (Scotland) Act 2005. The Female Genital Mutilation Act 2003 was amended by sections 70-75 of the Serious Crime Act 2015.

Under Section 1 of the act, a person is guilty of an FGM offence if they excise, infibulate or otherwise mutilate the whole or any part of a girl's or woman's labia majora, labia minora or clitoris. To excise is to remove part or all of the clitoris and the inner labia, with or without removal of the labia majora. To infibulate is to narrow the vaginal opening by creating a seal, formed by cutting and re-positioning the labia.

It is an offence for any person (regardless of their nationality or residence status) to:

- perform FGM in England and Wales (Section 1 of the act).
- assist a girl to carry out FGM on herself in England and Wales (Section 2 of the act).
- assist (from England or Wales) a non-UK person to carry out FGM outside the UK on a UK national or UK resident (Section 3 of the act).

If the mutilation takes place in England or Wales, the nationality or residence status of the victim is irrelevant.

FGM is a complex issue - despite the harm it causes, many women and men from practising communities consider it to be normal to protect their cultural identity.

FGM is believed to be a way of ensuring virginity and chastity. It is used with the intention to protect girls from sex outside marriage and from having sexual feelings.

Although FGM is practised by secular communities, it is most often claimed to be carried out in accordance with religious beliefs. FGM is not supported by any religious doctrine.

If you know of or suspect a case of FGM or a child or young person vulnerable to FGM follow the guidelines in this policy and discuss with your line manager.

For further information please refer to: <https://www.gov.uk/government/collections/female-genital-mutilation>

FGM Disclosures and Making referrals

Any person who is concerned that a young person may be at risk of FGM is able to make a referral to the CADS. We expect that staff will inform the DSL, who will be able to ensure that appropriate action is taken.

Staff must:

- Inform the DSL if they are concerned about a young person because they are at risk of FGM.
- Inform the DSL if a young person makes a disclosure/an allegation about FGM.
- Ensure that information relating to FGM, as applicable to individual young people, is recorded in the Safety Plan. This must be reviewed for continued accuracy.
- Record all allegations, disclosures and concerns relating to FGM using a **DETAIL RECORD SHEET**.
- Notify the Police by calling 101 to report any concerns.

Chapter Ten

Child Trafficking & Modern Slavery

Child trafficking is child abuse. Children are recruited, moved or transported and then exploited, forced to work or sold. They are often subject to multiple forms of exploitation. Trafficking can involve children or young people being moved long distances e.g. from another country, or much shorter distances e.g. across a city.

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 activity such as pick-pocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs.

Please also see section on Child Criminal Exploitation.

Child Trafficking is an offence. In March 2015 the Modern Slavery Bill received Royal Assent. The Act consolidates current offences relating to trafficking and slavery.

Please follow this link for details of the: Modern Slavery Act 2015:

<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

Child trafficking is child abuse and requires a child protection response. If you know, receive information relating to or suspect a child/young person has been trafficked or is vulnerable to trafficking you must deal with it in line with the Safeguarding Policy of Solace Partnership.

For further information please refer to: <https://www.gov.uk/government/collections/modern-slavery>

Modern Slavery

Modern slavery is when someone has gained control over, or ownership of, another person and is using this power to exploit them. It involved the recruitment, movement, harbouring or receiving of men, women or children using force, coercion, abuse of vulnerability, deception or other means in order to exploit them.

Someone is a victim of modern slavery if they have experienced any of the following:

- Are forced to work because of physical or verbal threats.
- Are owned or controlled by an 'employer', usually through mental, emotional, sexual or physical abuse, or the threat of such abuse.
- Are dehumanised, treated as a commodity, or bought and sold as 'property;'
- Are being held captive, have restrictions placed on their freedom or being moved against their will.

All staff must be aware of the following facts:

- (Trafficked) Young people are tricked, forced or persuaded to leave their homes. Traffickers use grooming techniques to gain the trust of a child, family or community.
- They may threaten families, but this isn't always the case – in fact, the use of violence and threats to recruit victims has decreased.
- Traffickers may promise children education or persuade parents their child can have a better future in another place.
- Sometimes families will be asked for payment towards the 'service' a trafficker is providing – for example sorting out the child's documentation prior to travel or organising transport.
- Traffickers make a profit from the money a young person earns through exploitation, forced labour or crime.
- Although these are methods used by traffickers, coercion, violence or threats do not need to be proven in cases of child trafficking - a child cannot legally consent, so child trafficking only requires evidence of movement and exploitation.

If a child continues to be at risk of harm through trafficking or there remain concerns about a child's risk of being subject to modern slavery, staff must:

- Refer any concerns or disclosures regarding trafficking to the manager (DSL), without delay.
- Ensure that information relating to specific trafficking risks to individual children are recorded and RAG rated in the Safety Plan. The Safety Plan must be reviewed every month for accuracy and relevance. If there is any indication or evidence indicating that the potential risk has changed, the Safety Plan must be reviewed and amended without delay. RAG (**Red-Amber-Green**) ratings, also known as 'traffic lighting,' are used to summarise indicator values, where green denotes a 'favourable' value, red an 'unfavourable' value and amber a 'neutral' value.
- Be mindful of any unusual activity around the home, such as people loitering or watching with no apparent purpose.

- Complete a **DETAIL RECORD SHEET** to record detailed information about any concerns or disclosures.
- Contact the **Police and CADS** in accordance with raising a safeguarding concern.

Chapter Eleven

Violence Against Women and Girls (VAWG)

Violence Against Women and Girls (VAWG) is a term that can be applied to numerous areas of concern, covering a multiplicity of issues relating to safeguarding children and young people. Some relate directly to Specific Safeguarding Issues (SSIs), such as CSE and FGM, whilst others are linked to abusive behaviours that encompass a range of concerns, such as harassment, emotional abuse and relationship abuse.

The HM Government (HMG) Strategy, ‘Ending Violence Against Women and Girls 2016 – 2020’ is clear that VAWG is both a cause and consequence of gender inequality. This refers to the need to challenge the “deep- rooted social norms, attitudes and behaviours that discriminate against and limit women and girls across all communities.”

Whilst there are some predictive factors that can be linked with a higher risk of becoming a victim or a perpetrator of VAWG, it occurs across all socio-economic boundaries and cultural spectrums.

VAWG can involve/be linked to:

- Domestic abuse.
- Stalking and harassment.
- Rape.
- Sexual offences (excluding rape).
- So-called ‘honour-based’ violence, forced marriage and Female Genital Mutilation (FGM).
- Child abuse.
- Human trafficking and modern slavery.
- Prostitution; and
- Pornography and obscenity.

The above list is not exhaustive.

If a disclosure or VAWG concern is raised staff must treat this as a significant concern indicating possible abuse or harm.

Staff must follow protocols for dealing with a disclosure.

Chapter Twelve

PREVENT STRATEGY

PREVENT: A strategy to prevent radicalisation.

The Counter-terrorism and Security Act 2015 places an obligation on organisations to, “in the exercise of its functions, have due regard to the need to prevent people from being drawn into terrorism.”

This is known as the “Prevent Duty”. Please read the full guidance from the UK Government on the Prevent Duty:

Solace Partnerships is committed to maintaining a safe, welcoming and inclusive environment and protecting those that are vulnerable.

We do need to be mindful of the threat of vulnerable service users being drawn into extremism.

This means that we have a shared responsibility to:

- Respond to the ideological challenge of terrorism and extremism and the threat we face from those who promote it.
- Prevent people from being drawn into terrorism and extremism and ensure they are given appropriate advice and support.
- Work with other agencies as required to address the risks of radicalisation.
- Extremism is defined as ‘vocal or active opposition to fundamental British values including democracy, rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs.

By ‘vocal threat’ this also includes internet and social media content. Significant threats to safety and security is from groups such as ISIS, Al Qa’ida/Daesh and the far right/left.

What to do if you have a concern about extremism?

As with any safeguarding issue it is your duty as a member of staff or volunteer at Solace Partnerships to follow up any concerns you have about possible radicalisation or extremism.

As ever using skilled ‘professional curiosity’ is vital in noticing and reporting changes in behaviour and attitudes that concern you.

Please do not keep concerns and worries about extremism or potential radicalisation to yourself – discuss it with your line manager, the Safeguarding lead for your setting or a senior manager. Make a note of your concerns and take appropriate actions.

If you are concerned about a potential act of extremism or terrorism?

Please make a note of your concerns. If you have immediate concerns call the Police on 999.

If your concerns do not relate to an imminent issue call the CADS team (as appropriate).

Please tell your manager, a Director or the Chief Executive Officer you have done this.

It is our legal duty to report concerns about acts of terrorism or potential acts of terrorism to the Police.

Please follow this guide for more details:

<https://www.norfolkscb.org/wp-content/uploads/2021/08/Prevent-Norfolk-practitioners-quick-guide-v6-2021.pdf>

Chapter Thirteen

Unaccompanied Asylum-seeking children

Unaccompanied asylum seeking and refugee children can be some of the most vulnerable children in our society. They are alone and in an unfamiliar country, at the end of what could have been a long, perilous and traumatic journey. Some of these children may have experienced exploitation or persecution in their home country or on their journey to the UK. Some may have been trafficked, and many more are at risk of being trafficked, being exploited in other ways, or going missing once they arrive in the UK.

We must remember that they are children. It is true that their immigration status will have an impact on their future, but they should not be defined solely by their status as an asylum seeking or refugee child. They are children who are likely to have faced many difficulties in their lives and will need to be cared for while they are in the UK. They are children who will need access to education and a range of public services to offer them the support and accommodation they need to promote their safety, health and wellbeing.

Solace Partnerships is committed to the United Nations Convention on the Rights of the Child. The overarching principle of acting in the best interests of the child has been at the heart of our approach in developing our services. We recognise that all children need to be protected from harm, their views heard and acted upon, and to have consistent support provided for their individual needs.

Solace Partnerships provide high quality training to existing support workers, so they have the skills and confidence to support these children. We know that one of the risk factors associated with unaccompanied children going missing is having support workers who are not able to develop trusting relationships and who are not adequately trained to understand the experiences and risks they face including the child's vulnerability to exploitation or radicalisation.

The training is aimed to increase awareness of unaccompanied asylum-seeking children and enable support workers to be more alert to children's specific needs, to recognise the indicators and impact of trafficking, and to apply practical support to prevent them from going missing.

Whether unaccompanied asylum seeking, and refugee children arrive via the Government's Vulnerable Children's Resettlement Scheme directly from conflict regions, are transferred from elsewhere in Europe, or claim asylum when they reach the UK, ensuring they are properly safeguarded requires a swift and co-ordinated response. Unaccompanied children can be highly vulnerable and can be particularly at risk of going missing due to trafficking and exploitation.

Safeguarding and promoting the welfare of all children is a key duty on local authorities and requires effective joint working between agencies and professionals. From the point at which they come into first contact with officials, to their placement in safe and appropriate accommodation with their health, educational and other needs adequately supported, clear pathways and clearly defined legal responsibility is vital.

We are committed to ensuring children and young people have the information, support and help they need to be safe and to keep themselves safe, and for effective local systems to be in place to ensure that children are properly safeguarded.

Local authorities told us that unaccompanied children sometimes go missing because they are worried that they will not be granted leave to stay in the UK and will be sent back to their country of origin. Our support workers and Directors will receive training on ‘triple planning’ which will help our staff reassure unaccompanied children that they have support and need not run away and to build resilience in this group of children.

Local authorities told us that unaccompanied children sometimes go missing because they feel unsupported in their application for asylum. Our staff will have access to the downloadable training resources to enable them to understand the detail of when and how they are required to be involved in a child’s asylum claim will help workers support children.

Local authorities also told us that children go missing because after months or years of being independent while they travelled to the UK, children can be unaware of what it means to be “looked after”. They may be unaware that they need to communicate their whereabouts to carers and the local authority for example. We will provide information for children about what it means to be living in supported accommodation to help address this and will provide mobile numbers for children to ring if they do go missing but want to return home.

Solace Partnerships will have a statement of Purpose and will regularly review all policies that are in place and ensure they are implemented. These include the Child safeguarding Policy, Preparation for independence programme, Risk assessment, Drug and alcohol policy, training for staff, complaints procedures, Location Assessments and recruitment process, Health and Safety, Training and Development of staff, Whistleblowing, Discipline and Grievance Policy.

Solace Partnerships will:

- Act in the best interests, and promote the physical and mental health and well-being, of those children and young people
- Encourage those children and young people to express their views, wishes and feelings
- Take into account the views, wishes and feelings of those children and young people
- Help those children and young people gain access to, and make the best use of, services provided by the local authority and its relevant partners
- Promote high aspirations, and seek to secure the best outcomes, for those children and young people
- Support those children and young people to be safe, and for stability in their home lives (supported living environment), relationships and education or work
- Prepare those children and young people for adulthood and independent living
- Solace Partnerships will have robust systems of recruitment, induction, supervision and development of support staff.
- We will have specific awareness training in cultural awareness, differing religious needs and legal support required when working with unaccompanied asylum-seeking children
- All support staff will participate in an induction programme which includes awareness raising about all aspects of the service provision and training on safeguarding
- Ongoing training provided, to enhance staff knowledge and skills based on an analysis of individual learning and development needs?
- In conjunction with the Local Authority social worker there is a protocol in place for a trafficking risk assessment and referral to the National Referral Mechanism.
- There clear processes for receiving new arrivals to ensure all immediate medical, physical, legal and safety needs are met
- All Solace Partnerships accommodation is located in a safe area where there is reasonable access to support networks (cultural & religious), health and leisure services and other amenities.
- There are points in any 24-hour period where staff are not on the premises, there is a clear process for accessing to out-of-hours assistance for the young people and they have emergency contact phone numbers
- There is a written policy to be followed in the event of an allegation being made about a support worker and both the young person and support worker know how they will be supported in the event of an allegation being made.
- There are clear processes to ensure the property is safe and secure for young people
- Solace Partnerships regularly review to determine if the setting meets the definition of a “children’s home”. If it does it would be registered as such.

Chapter Fourteen

Capacity to Consent and the Mental Capacity Act 2005

The Mental Capacity Act 2005 applies to all people aged 16 and over. It aims to empower people to make decisions for themselves, whenever possible, and also to protect those who lack capacity to do this. The Act starts from the basis that, unless proved otherwise, all adults have the capacity to make decisions.

Individuals may lack capacity if they are unable to:

- Understand information given to them.
- Retain that information for long enough to be able to make the decision.
- Weigh up the information available to make the decision; and
- Communicate their decision to others.

Where someone is found to lack capacity to make a particular decision, others may be permitted to make decisions on behalf of that person, so long as any such decision is made in the best interests of the person who lacks capacity.

For example, family and professionals might decide that it is in a person's best interest to live in a certain place, even though the person themselves lacks the capacity to consent to such a decision.

However, there are certain decisions which cannot be made on behalf of another person and this includes the decision to marry.

For example, Forced Marriage

There is therefore no legal basis on which someone can agree to marriage, civil partnerships or sexual relations on behalf of someone who lacks the capacity to make these decisions independently. However, families sometimes do believe they have the "right" to make decisions regarding marriage on behalf of their relative.

If a person does not consent or lacks capacity to consent to a marriage, that marriage must be viewed as a forced marriage whatever the reason for the marriage taking place. Capacity to consent can be assessed and tested, but it is time and decision specific.

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

A person's capacity to consent can change. For example, with the right support and knowledge, a person with a learning disability may move from a position of lacking capacity to consent to marriage, to having capacity. However, some children and adults with learning disabilities are given no choice and/or do not have the capacity to give informed consent to marriage and all it entails. This may include engaging in a sexual relationship, having children and deciding where to live.

Good practice in relation to this assistance and support includes:

- Listening to children and young people and make sure they know how to raise concerns.
- Understanding that in cases of forced marriage, it is important that agencies do not initiate, encourage or facilitate family counselling, mediation, arbitration or reconciliation. There have been cases of individuals being murdered by their families during mediation. Mediation can also place the individual at risk of further emotional and physical abuse.
- Being aware that on occasions when an “at risk” individual insists on meeting with their parents, it should only take place in a safe location, supervised by a trained/specialist professional with an authorised accredited interpreter present (not from the same community), as parents will sometimes threaten the individual in their other language.
- Being aware that allowing a victim to have unsupervised contact with their family is normally extremely risky. Families may use the opportunity to subject the victim to extreme physical or mental duress or take them overseas regardless of any protective measures that may be in place.

Solace Partnerships will provide training and raise awareness about forced marriage for staff who support young people at risk of forced marriage.

Staff must:

- Inform the DSL if they are concerned about a young person being at risk of forced marriage.
- Inform the DSL if a young person makes a disclosure/an allegation about forced marriage.
- Ensure that information relating to forced marriage, as applicable to individual young people, is recorded and RAGG rated in the Safety Plan. This must be reviewed for continued accuracy.
- Record all allegations, disclosures and concerns relating to forced marriage using a **DETAIL RECORD SHEET**.
- Notify the Police by calling 101 to report any concerns.

Chapter Fifteen

Safeguarding Key Topics

The following section looks at current issues in safeguarding, these are imperative to understand in order to safeguard the young people we look after.

Exploitation - Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of eighteen or a vulnerable person over the age of eighteen. Those exploiting others in all cases will have power over another by virtue of their age, gender intellect, physical strength, and/or economic or other resources.

For example, County lines - Child Criminal Exploitation is common in county lines [illicit drugs being moved from major cities, e.g. London, into rural areas] and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of eighteen. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. (Criminal Exploitation of Children and Vulnerable Adults, Home Office, September 2018).

Criminal exploitation – criminal exploitation can also extend to families where an adult maybe vulnerable to exploitation due to being a victim of domestic abuse, a sex worker, have a mental illness, disability or have substance addiction. As a result, children and young people can also be at risk of harm if their parent/carers are being exploited and or their home environment is used for criminal activities even if the child/young person is not directly being exploited.

Child Sexual Exploitation - involves ‘exploitative situations, context and relationship where young people receive ‘something’ (e.g. food, accommodations, gifts, cigarettes, money) as a result of them performing, an or another or other performing on the sexual activities’ (Norfolk Country Council). Child sexual exploitation can occur remotely, such as young people being persuaded to post sexual images on the internet or via an app which can then be shared without their knowledge and for no payment or gain for the child. Sexual exploitation covers both penetrative and nonpartitive sex.

The above types of exploitation are strongly linked to:

- **Trafficking**
- **Modern slavery**
- **Gang-related organised crime.**

Any child can be exploited in these ways, and it affects both genders but there are particular factors that make some children, young people are statistically more likely to be a victim of both criminal and sexual exploitation:

- **Lack of a safe or stable home** (chaotic home environment due to criminality, violence in the home, substance abuse).
- **History of abuse.**
- **Social isolation, social difficulties or bullying.**
- **Economic vulnerability** (makes the offer of money more tempting/or a necessity).
- **Disabilities, substance abuse or health issues.**
- **Being looked after.**
- **Connections with peers who are being exploited.**
- **Homelessness/insecure accommodation.**
- **At risk of school exclusion, school exclusions or attending specialist provision.**
- **Indications that exploitation is occurring relevant to both criminal and sexual exploitation.**
- **Episodes of going missing from home/care/school for periods of time which could be hours, days or weeks.**
- **Unexplained gifts, money, clothing, jewellery, make up, haircuts, sex toys.**
- **Changes in behaviour;** secrecy, being withdrawn, change of friends, controlling relationships with older peers.
- **Disruptive, hostile or physical aggressive at home and school:** including sexualised language/violent or drug dealing behaviour.
- **Talking about going to ‘parties’, out of area, people’s houses, unknown areas, in possession of unknown keys, hotel key cards.**
- **Use of or increase in use of substances.**
- **Increased use of phones/messaging,** more text or pings.
- **Entering/exiting vehicles/taxis with unknown adults.**
- **Repeated STI/Pregnancy.**
- **Self-harm/emotional wellbeing changes.**
- **Abduction/ forced imprisonment.**
- **Vaseline, lubrication.**
- **Weapons** (often with handles covered with cling film).

If you think that a child, young person or family is being exploited you need to raise your concerns with the Designated Safeguarding Lead and with professionals working with the young peoples.

For those being exploited there can be barriers to seeking or accepting or getting them help to free them from exploitation:

- The person may not recognise the exploitation.
- The person feels they have no power and are frightened by violence, threat of violence, blackmail.
- Feeling of shame/ guilt of things they have experienced.
- Fear of repercussion can extend to friends and family if seen to be engaging with professionals.
- Some professionals can minimise the harm by describing young people as ‘making a lifestyle choice’ or ‘putting themselves at risk’.
- Mistrust of adults and professional due to previous involvement with police or social services.
- For some young people they get kudos, access to finances, substances or gifts they would otherwise not be able to access.
- Debt-bondage – young people are often given free drugs or loose drugs to police arrests, thefts from rival gangs so that they have to pay back large sums of money in debt bondage.

How you can help as staff:

- Be interested, professionally curious, listen carefully to what young people are saying and hear it from a safeguarding perspective.
- Don’t make judgements, even if a young person is involved in criminal activities. Remember they may appear willing participants, but the choices and actions are being controlled by perpetrators with more power than them.
- Where sexual exploitation exists ensure that no blame is apportioned to the young person. Some victims will maintain links with abusers and even protect them.
- Challenging professional views which are oppressive, judgemental or rejecting need for a for a child protection response.
- Be creative in our approach, talk about young people resilience, strengths and create a safe space for discussion, about their life, interests to discover their own understanding about county lines, status, power and control.

To develop your knowledge and practice we recommend you read the following documents:

<https://www.londonlc.org.uk/safeguarding-understanding-county-lines-july-2022/#:~:text=County%20lines%20is%20a%20form%20of%20criminal%20exploitation,the%20law%20and%20a%20form%20of%20child%20abuse.>

To elaborate on County Lines

The following has been adapted from Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance (September 2018).

What is county lines exploitation?

County lines is the Police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or “deal lines”.

It involves child criminal exploitation (CCE), because gangs use children and young people to move drugs and money to and from “market locations.” These children and young people are referred to as “Bics” by the drug dealers, which is used as a reference to their perceived disposability.

Gangs establish a base in the “market location” that is typically the home of a vulnerable young person or adult by coercion or even violence in a practice referred to as ‘cuckooing’.

County lines is a major issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery and missing persons.

How does it affect children?

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child (male or female) under the age of eighteen years.
- Is exploitation, even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, as well as other children or young people; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want. The exchange can include both tangible (such as money, drugs or clothes) and social/emotional rewards (such as status, protection or perceived friendship or affection).

It is important for staff to remember the unequal power dynamic within which this exchange occurs. The receipt of something by a child, young person or vulnerable adult does not make them any less of a victim. Notably, the prevention of something negative can also fulfil the requirement for exchange, i.e. child may engage in county lines activity to stop someone carrying out a threat to someone who is close to them.

Targeting of vulnerable children

Gangs specifically target vulnerable children and those who do not have support networks. Children with special educational needs, mental health problems or disabilities are known to be purposely targeted. Gangs also look for emotional vulnerability, such as children experiencing problems at home, absent/busy parents or bereavement. The gangs seek to fill that emotional gap for the child and become ‘their family’.

Male children are most commonly exploited but female children are also used and exploited by gangs. It is thought that 15-16 years is the most common age for children to be exploited by these gangs but there are reports of children below the age of 11 years being used.

Gangs are increasingly looking to recruit ‘cleanskins’ (i.e. children with no previous criminal record who are unlikely to be stopped by the Police, including children from white, middle class backgrounds and from further afield).

Children Looked After (CLA)

Gangs target looked after children, particularly those in residential children’s homes and children in pupil referral units. Children who have been placed out of their home area are particularly vulnerable.

Child Sexual Exploitation (CSE)

Although child sexual exploitation (CSE) is not the driving factor in county lines gangs exploiting children, a clear link exists between County Lines and CSE. Girls are typically most at risk, but there is evidence of sexual abuse of boys within County Lines as well. Please refer to Page 37 for more information and guidance on tackling CSE.

Grooming and Coercion

Gangs often use threats, coercion and violence to force children to do what they want. They punish gang members for making mistakes or failing to meet drugs sales targets.

The punishments are extremely violent such as stabbings, anal injuries caused by jagged objects and acid attacks. Gangs may also trick children into getting into their debt, for example, by giving them a mobile phone only to later demand repayment for the cost of the phone. The child will then be in 'debt bondage' to the gang, owing it labour or services as security for the repayment for the debt or other obligation.

Peer grooming is common and takes place in schools and via social media. Music videos on YouTube are used to glamorise gangs and to draw in children from wider social and geographical areas. These methods can lead to children firmly believing they have made an active choice to join the gangs and to deny that they have been exploited and, at the same time, leave them so terrified that they will do anything they are told.

Children and Young people are Victims (not Suspects)

Child Criminal Exploitation (CCE)

There is currently poor awareness and understanding of CCE and it is often the case that victims are mistakenly viewed as having made a 'choice' to engage in criminal behaviour.

This is often exacerbated by the child's refusal to recognise themselves as a victim. Comparisons have been drawn between CCE and Child Sexual Exploitation (CSE) and there are calls for CCE to be treated similarly to CSE. Children who are being exploited by gangs for their criminal purposes are victims and they should be safeguarded, not criminalised.

This principle has been enshrined in UK law following the ratification of The Council of Europe Convention against Trafficking in Human Beings which states 'each party shall, in accordance with the basic principles of its legal system, provide for the possibility of not imposing penalties on victims for their involvement in unlawful activities, to the extent that they have been compelled to do so'.

Identifying CCE

It may not be easy to identify that a child is the victim of gang exploitation. However, there are a number of consistent factors associated with children and young people who have been abused through CCE. They:

- Have been arrested for possession and intent to supply of significant quantities of drugs, particularly heroin and crack cocaine.
- Were arrested away from their own home area.

- Were arrested on public transport, particularly a train.
- Were arrested in a cuckooed address.
- Are in care, particularly residential care or have been in care.
- Were found carrying a weapon when arrested.
- Have an unexplained injury, possibly caused by a knife;
- Were arrested with or are accompanied by older males or females.

Other indicators of gang involvement include:

- Persistently going missing from school or home.
- Regularly being found away from the home area.
- Unexplained acquisition of money, clothes, or mobile phones.
- Excessive receipt of texts / phone calls.
- Relationships with controlling / older individuals or groups.
- Leaving home / care without explanation.
- Suspicion of physical assault / unexplained injuries.
- Significant decline in school results / performance.
- Self-harm or significant changes in emotional well-being.

If staff have concerns that a young person may be at risk of county lines exploitation, they must notify CADS/EDT and the Police. The DSL must be notified immediately, and factual information must be shared with local authority social care services as required.

Staff MUST be alert to the following signs of County Lines activity:

- Returning home late, staying out all night or going missing.
- Being found in areas away from the home.
- Increasing drug use, or being found to have large amounts of drugs on them.
- Being secretive about who they are talking to and where they are going.
- Unexplained absences from college, training or work.
- Unexplained money, phone(s), clothes or jewellery.
- Increasingly disruptive or aggressive behaviour.
- Using sexual, drug-related or violent language you wouldn't expect them to know.
- Coming home with injuries or looking particularly dishevelled.
- Having hotel cards or keys to unknown places.

In all cases where concerns are identified, staff must:

- Ensure the DSL/ manager is notified if they become concerned about a young person because they feel s/he is being subjected to County Lines activities or at risk of being exploited through County Lines activities. If out-of-hours, staff must contact the On-Call service.
- Liaise with the DSL to consider a referral to the National Referral Mechanism if the young person is thought to have been used for transporting drugs.
- Inform the DSL/ registered manager if a young person makes a disclosure indicating that they are a victim of County Lines or that they have been approached by someone (or a group of people) who intend to cause harm in a way that is consistent with County Lines.
- Undertake training to be alerted to the signs and indicators associated with children who are at risk of County Lines or abused in this way.
- Be proactive, non-judgmental and consistently vigilant to the potential for County Lines to impact upon the lives of children in our care.

Children rarely disclose CSE, so staff must be aware of the following risk indicators:

- Acquisition of money, clothes, mobile phones (etc.) without plausible explanation.
- Gang-association and/or isolation from peers/social networks.
- Unexplained absences from school, college or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.
- Staff should not assume that girls are the only victims of CSE. Boys have been identified as victims too. This is important, as males are thought less likely to make disclosures about CSE and staff should be alert to this.

Preventing CSE - Reviews of Safety Plans will consider whether any form of exploitation is a risk factor for children and young people.

Staff in consultation with the child or young person concerned must ensure that:

- Each child or young person's Safety Plan includes a RAGG Rating (Red (High Risk), Amber (Medium Risk), Green (Low Risk) and Grey (No Risk)), specifically regarding known or potential risks of CSE.
- If concerns are identified, a Solace Partnerships CSE Risk Assessment Tool must be completed to aid completion of the Safety Plan.
- Staff have access to, and demonstrate sufficient understanding of the child or young person's Safety Plan.
- Any concerns about children or young people presenting in a way that is consistent with 'Indicators of Possible CSE' means that due consideration towards making a referral to CADS is considered, as well as informing the Police.
- If staff become concerned about a young person due to CSE they must inform the DSL. If the young person is thought to be at immediate risk of harm, the Police and CADS must be contacted without delay.
- Staff inform the DSL if a young person makes a disclosure/an allegation indicating that they are a victim of CSE or that they have been approached by someone (or a group of people) who intend to cause harm in a way that is consistent with CSE.
- Staff undertake training as necessary to be alerted to the signs and indicators associated with young people who are at risk of CSE or abused in this way.
- Staff remain proactive, non-judgmental and consistently vigilant to the potential for CSE to impact upon the lives of young people.

Disclosures - If a young person says something that indicates CSE has taken place:

- Listen and take seriously what a young person says and never express disbelief.
- Do not make any suggestions about what has taken place, or how it came about, or question the young
- Avoid making judgements about what is being said though reassure the young person that they are not responsible for what may have happened.
- Do not promise to keep information secret. Make it clear that you will have to refer the matter on and to whom.
- Tell the young person that there are people who can help.
- Write down what has been said, using the young person's exact words and what was said in response.

Be factual and state opinion, sign, date report and send to social worker and DSL.

NOTE: All disclosures must be escalated to the DSL without delay.

Where there are immediate concerns, CADS will be contacted and informed of the disclosure. If it is believed a criminal act has taken place, the Police must be called.

Solace Partnerships Limited is a social care organisation. As a Data Controller, Solace Partnerships holds highly sensitive personal data about children, young people and their families, as well as staff and contractors. This is essential to our business as a responsible provider of social care services, but moreover it is a critical part of keeping service users safe from potential or actual harm.

Staff are expected to make responsible and informed decisions about when and with whom to share information. If there is ever any doubt, colleagues should seek advice from the DSL, who will liaise with the DPO as required.

Chapter Sixteen

Concerns About the Conduct of a Colleague or Other Adult

As well as demonstrating good professional boundaries yourself it is also your responsibility to report concerns that you may have about any inappropriate conduct demonstrated by colleagues or those seeking to work in your service (on a paid or unpaid basis).

It is important that you do this if you feel safeguarding is compromised or risks are taken, however slight the risk is. Although it is disconcerting to think a co-worker or potential co-worker is behaving inappropriately; it is important that you follow up your suspicions and instincts as this could avoid abuse occurring.

If you suspect a colleague (or a job applicant for paid or unpaid work) from your service or another service of behaviour that could put children, young people and/or vulnerable adults at risk you must follow these steps:

- Make a note of your concerns while they are fresh in your mind.
- Raise these concerns with your Director/DSL as soon as possible - If you are not comfortable talking through concerns with your DSL, or if your concerns are about them, then approach a director. If your concerns are about the Directors, then you may wish to raise these issues with one of an independent person.
- Do not wait for your next scheduled meeting.

Following this discussion, if you think there are issues to be addressed you must contact the Local Area Designated Officer (LADO – see the Safeguarding Directory). Director/DSL may do this for you or you may be asked to complete the referral form.

[Local Authority Designated Officer \(LADO\) - Norfolk Safeguarding Children Partnership \(norfolkscb.org\)](http://norfolkscb.org)

We would never cover up any wrong-doing or malpractice, but behaviour can be misinterpreted. Therefore, it is important that you maintain confidentiality on such issues or reputations could be unnecessarily damaged where no wrongdoing had taken place.

Abuse of trust

Abuse of trust can occur in a number of settings; for example, in an education establishment, a residential establishment, a foster home, a social club or other activity.

Abuse of trust relates to all relationships where one person is in a position of responsibility (and power) in relation to another person, who is either under eighteen years or is a vulnerable adult, whether the relationship is of a heterosexual or homosexual nature.

Abuse of Trust can happen by: paid employees, ex-employees, unpaid staff (for example trainees and students), volunteers, foster carers, consultants and contractors. This applies to all staff, regardless of gender, race, religion, sexual orientation or disability.

Staff and volunteers are in a relationship of trust because they have the potential to hold power or influence over young people. This must never be abused.

Abuse of Trust is distinct and different from sexual abuse or other abuse. Sexual and other forms of abuse take place where the victim does not or cannot consent to his or her treatment. There need not be any abuse of a relationship of trust. Any sexual activity which is not freely consenting is criminal. In contrast, the sexual activity covered by 'Abuse of Trust' may seem consensual, but it is rendered unacceptable because of relative positions of power. This refers to the potential for people in a 'relationship of trust' to misuse or abuse that relationship.

An allegation against a member of staff regarding a child or young person will be referred to the Local Authority Designated Officer (LADO). In all cases, the Police must be called if illegal activity is suspected or it is an emergency. This includes historical allegations, as well as allegations against a former colleague. If criminality is alleged, the allegation should be referred to the Police.

Chapter Seventeen

Behaviour Management

At Solace Partnerships we use Safety Plans and Individual Crisis Management Plans (ICMPs) as primary behaviour management tools, to ensure the young people we look after are being acknowledged and understood from day one.

Safety Plans - each young person must have a completed and regularly reviewed Safety Plan. The Safety Plan is, in effect, an overarching risk assessment.

The Safety Plan identifies any known or potential risks associated with individual young people. It is imperative that all staff working in the home are familiar with each young person's Safety Plan. Each Safety Plan must be reviewed on a monthly basis or following any significant changes in presentation that indicate a change in the level of risk. As such, the Safety Plan must be regarded as a "live" tool that aims to safeguard young people

Individual Crisis Management Plans (ICMPs) - as consistent with above, each young person must have a completed and regularly reviewed ICMP. The ICMP is, in effect, an overarching list of what should and shouldn't be done for each young person in the setting. The ICMP identifies the following:

- Baseline presentation (i.e. how the child or young person presents or "What does the behaviour look like?")
- Pre-Crisis presentation (as above)
- Possible Triggers (i.e. what may cause or promote challenging or crisis behaviours)
- Escalation (i.e. how the child or young person presents or "What does the behaviour look like?")
- Outburst (as above)
- Recovery (as above)

In all cases, the ICMP will specify (a) what staff must do and (b) what staff must not do. The emphasis is firmly upon the use of strategies to de-escalate potentially challenging situations.

It is imperative that all staff working in the setting are familiar with each young person's ICMP. Each ICMP must be reviewed on a monthly basis or following any significant changes in presentation that indicate a change in a young person's presentation. As such, the ICMP must be regarded as a "live" tool that aims to safeguard young people.

It is essential that young people are consulted and able to participate in the development of their own Safety Plan and ICMP, taking account of their individual needs and circumstances.

It is a primary expectation that staff will:

- Be familiar with the conditions of each young person's ICMP and Safety Plan.
- Never use force or threatening behaviour.
- Try to defuse (i.e. de-escalate) situations before they escalate;
- Adhere to the expectations, procedures and standards detailed in the Positive Relationships Policy and the Physical Restraint Policy, which confirms that physical restraints are not to be used in supported accommodation settings.
- Be mindful of factors that may impact upon a young person's behaviour (e.g. contact meetings) and where necessary, take appropriate action to reduce the likelihood of crisis or challenging behaviours.
- Never use sarcasm, demeaning or insensitive comments towards young people. This never acceptable in any situation.
- Staff should, wherever possible, avoid shouting or any such behaviour that is likely to counter de-escalatory strategies.

It is the responsibility of the Director/DSL to:

- Ensure that a Safety Plan and ICMP is completed for each young person, prior to admission and based upon all available information.
- Review, update and amend Safety Plans and ICMPs as the young person's placement progresses, with meaningful input from the child concerned:
 0. Every calendar month. This is to ensure continued accuracy and effectiveness.
 1. Following a significant event that relates to concerns over the safety and welfare of the young person concerned.
- Inform all staff working directly with young people of any changes made to existing Safety Plans and ICMPs.
- Ensure that all staff (including bank, volunteers and any agency staff) are familiar with the conditions of each young person's Safety Plan and ICMP before they work directly with the young people.

Chapter Eighteen

Matching

All staff and Directors must have due regard for the importance of matching referred young people to those already living in the accommodation.

In considering any new referral to the accommodation, there must be clear and reasonable regard to whether the setting has staff who have sufficient skills, experience and qualifications to support each young person and meet her/his individual needs. This will take account of external agency interventions and support.

The peer dynamic (“mix of young people”) must be considered in terms of the impact of presenting needs, difficulties and any challenging behaviours exhibited by existing young people, and the young person referred.

For all potentially suitable referrals, the delegated staff member must complete:

- A combined Placement Referral Matching and Impact Assessment Form; and
- A risk assessment must be used to ascertain the suitability of Unaccompanied Asylum-Seeking Children (USAC) referred to our services. The risk assessment should include information gathered through face-to-face meeting(s) and any other available information.

Additionally, there must be due consideration for the impact of and/or changes made to the annual location assessment to ascertain:

- Any arising safeguarding concerns that could impact upon the young people in the setting.
- Changes to accessibility of services.

This should help to establish:

- If the location of the setting influences the potential for an already vulnerable young person to be a victim of crime, such as being targeted for sexual exploitation.
- Whether there is a likelihood of young people becoming drawn into gang crime or anti-social behaviour in the local area.
- The suitability of the local neighbourhood as a location to support young people who may have a been victims of abuse, neglect and trauma.
- Whether there are environmental factors that would represent a hazard to young people, such as locations near level crossings or busy roads.

Any members of staff involved in considering referrals must be able to demonstrate that the above conditions have been fully considered. All child protection arrangements, monitoring, reviewing and support mechanisms must be detailed in full in the young people's relevant support plans.

Where a placement has been offered and agreed, the following conditions must be applied:

- The Director and DSL is responsible for ensuring that a Safety Plan and ICMP is completed for each young person, prior to admission.
- As the placement progresses Safety Plans and ICMPs must be reviewed and amended, with meaningful input from the young person concerned:
 0. Every calendar month. This is to ensure continued accuracy and effectiveness.
 1. Following a significant event that relates to concerns over the safety and welfare of the young person concerned.
- The Team Manager must inform all staff working directly with young people of any changes made to existing Safety Plans and ICMPs.
- All staff must be familiar with the conditions of each young person's Safety Plan and ICMP before staff work directly with the young people, as far as is reasonable and practicable.

Please note that Solace Partnerships will not consider a young person for any of our services if we do not believe it would be safe to do so.

Chapter Nineteen

Deprivation of Liberty Safeguards (DoLs)

(This is an amendment of the Mental Capacity Act 2005)

Deprivation of Liberty, DoLs, (taking somebody's freedom away) can only regularly take place if they are under continuous supervision, not free to leave a setting or legally detained.

A sixteen–eighteen-year-old 'in care' (LAC/CIC – see section on Safeguarding the Looked After Child), unless in a secure setting or where there is a court endorsed arrangement similar to a secure setting is not considered to be under continuous supervision or detained.

There may be rare instances where a DoLs may have to be used as a very short- term answer to a heightened situation. This must be a last resort.

Any DoLs must be:

- The least restrictive option
- No longer than is absolutely necessary
- Recorded and reviewed

If DoLs are required on a longer-term basis the Local Authority must be consulted and a plan of action agreed.

In many cases this will mean an adult is cared for by a difference service e.g. a secure service; detained under the Mental Health Act, held in a custodial setting.

If you think the liberty of a vulnerable adult is being deprived by others (who may be colleagues) you are obliged to take action and follow the advice given earlier in this handbook; 'Suspicious about the conduct of a colleague or other adult' on page 14.

Further Reading

NHS England has produced a useful guide in relation to Adult Safeguarding:

<https://www.england.nhs.uk/wp-content/uploads/2017/02/adult-pocket-guide.pdf>

Chapter Twenty

Keeping yourself safe

In order to best safeguard the children, young people and vulnerable adults we are working with we also must keep ourselves safe. This section suggests ways you can keep yourself safe and also what to do if you feel a (paid or unpaid) co-worker is not keeping themselves or their service users safe.

- Sometimes our service users are very vulnerable and have experienced abuse and/or unhealthy relationships. This may make them more sensitive to potential abuse and they may not be comfortable with the levels of touch, teasing, questioning and use of humour that you find normal in your life.
- It is important that all staff behave in a way that cannot be misconstrued despite the varying frames of reference we may be working within. This avoids unnecessary allegations and the stress these cause to all concerned.
- It is important that all staff and volunteers and anybody else with access to our service users (including: contractors, partner agencies) demonstrate a good understanding of professional boundaries and are able to demonstrate this understanding in their working practices. It is the duty of the Director and/or DSL to identify where further training is required to observe good professional boundaries and arrange the necessary formal or informal training opportunities.

In the following guidance the term ‘staff’ refers to paid and unpaid staff.

- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work and be seen to work in an open and transparent way.
- Staff should discuss and/or take advice promptly from their DSL or Director over any incident which may give rise to concern.
- Records should be made of any incident where professional boundary concerns have been raised.
- Staff should apply the same professional standards to all service users.
- Staff need to be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them

One-to-one working:

It is not realistic to state that one-to-one situations should never take place. In considering any decision for 'one to one' working the protection and safe care of the young person and the staff must be the primary consideration. Staff must always act and maintain professional boundaries in relation to any physical contact they may have with any young person we support. It is likely that the young people we support may have been subject to inappropriate approaches from adults (whom they trusted), which may have included physical and sexual contact from adults resulting in physical and sexual abuse.

Staff are in a position of trust and power and that this brings considerable professional responsibilities for staff about their practice and conduct.

Advice to remember when maintaining good professional boundaries:

- Discourage and make note of any over-affectionate children, young person or vulnerable adult.
- Never share your personal contact details or personal social media details with a service user (The ICT Usage Code of Practice gives clear guidelines on the use of social media).
- Avoid using your personal mobile phones when around service users.
- Do not use the camera function on your personal mobile phone to take pictures of activities and/or service users.
- Do not accompany service users to the toilet or to a bathroom unless there is a noted medical or care related reason for doing this. Where this is required, please follow the guidance and procedure issued by the Director.
- If you have been asked to provide transport, you must ensure your car is free of your personal information, such as letters to your home address or other young people's records.
- Always follow risk assessments, specific guidance of other professionals and professional judgement to safeguard yourself and individuals with appropriate boundaries.
- It is not usual to disclose personal information about your family/friends to a service user. Of course, on some occasions this may be entirely appropriate to demonstrate empathy and experience; but do so in a way that protects your family/friends as well as the service user by giving an overview rather than sharing exact details.
- Never invite a service user to your home (even if you are just popping in while transporting them to an activity).

Chapter Twenty-One

Staff Responsibilities

Any instances where a young person is considered as missing from home and there is a likelihood of potential harm, this must be treated as a priority. Young people who leave the premises without the knowledge of staff will be regarded as at immediate risk of potential harm if:

- Their whereabouts is unknown, they have not returned when they said they would.

When transporting young people, staff must:

- Ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/or ability to drive.
- Be aware that the safety and welfare of the young person is their responsibility.
- Record details of the journey in accordance with agreed procedures
- Ensure that their behaviour is appropriate (all the time).
- Ensure that there are proper arrangements in place for vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven (if in any doubt, you must check with a senior professional).
- Ensure that any impromptu or emergency arrangements of lifts are recorded.

As soon as staff become aware that a young person has gone missing or been missing, they must:

- Inform the Director or DSL and CADS/EDT.
- Follow the any advice or direction provided, including the need to contact the Police to report the young person as missing - stating the young person's risk category as necessary. If in any doubt, notify the Police anyway because the safety of the young person must remain paramount.
- Continue to attempt contact the young person by phone, and/or known contacts and friends to locate him/her.
- All incidents where a young person is identified as MfH must be recorded in writing. Details should be recorded using a DETAIL RECORD SHEET and a summary entered in the Missing from Home Register. All records must be copied to the young person's individual case file.
- Staff must take particular care to state the time the s/he was discovered or thought to be missing, the time the incident was reported to the Police, her/his age, circumstances surrounding the absence, and their return home. All entries must be signed by a member of staff and the young person's views and feelings must be documented.

- Staff should take care to incorporate any new information gained through the experience of the young person going MfH into their Safety Plan. This refers to antecedents (i.e. “what happened before”), changes in presentation or circumstances and known associates/peers who could encourage or manipulate a young person into going MfH.
- “Safe and Well” Checks
- If the Police have been involved, “Safe and well” checks should be carried out by the Police as soon as possible after a young person reported as missing has been found. Their purpose is to check for any indications that the young person has suffered harm, where and with whom they have been, and to give them an opportunity to disclose any offending by or against them.
- Independent Return Interviews
- When a young person is found/returns staff should take reasonable action to ensure s/he is offered an Independent Return Interview. Independent return interviews provide an opportunity to uncover information that can help protect children and young people from the risk of going missing again, from risks they may have been exposed to while missing or from risk factors in their home.
- This interview should be carried out within 72 hours of the young person returning to the home. This should be an in-depth interview and is normally best carried out by an independent person (i.e., someone not involved supporting the young person, such a local authority commissioned service).

Management must remain aware that if a young person is frequently missing, it could indicate that an unregulated placement is not appropriate.

This means:

1. A multi-agency risk management strategy is required, or
2. A placement in unregulated accommodation may not be appropriate (and a Care placement could be required, for example). Solace Partnerships must ensure that the service lead professional and the service manager notify the commissioning authority of the concerns and (in partnership) consider whether or not the young person remains suitable for supported accommodation. All parties must take full account of the conditions applied to unregulated support and regulated residential care respectively.

If the young person has isolated incidents of MfH, or episodes are rare, staff must review the young person’s Safety Plan and consider the young person’s:

- Individual circumstances, including family circumstances.
- Motivation for running away.
- Likely destinations and associates, as well as any pattern of absences.

- Circumstances in which the young person was found or returned.
- Individual characteristics and risk factors (i.e. learning difficulties, mental health issues, depression, etc.).

Following the safe and well check and independent return interview, staff should share information and work with local authority children's services, the Police and voluntary services (if appropriate) to:

- Build up a comprehensive picture of why the young person went missing.
- Understand what happened while they were missing.
- Understand who they were with when they were missing and where they were found.
- What support they require upon returning to home; and
- Assist in support planning and risk assessment strategies.

All Staff Will:

- Ensure that when lone working is an integral part of their role, an appropriate risk assessment should be agreed (using a "Solace Partnerships Person and Place Risk Assessment").
- Take part in lone working training when available or requested.
- Avoid meetings with young people in remote, secluded areas.
- Always inform colleagues about the contact(s) beforehand, assessing support needs.
- Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy.
- Always report any situation where a young person becomes distressed or angry to a senior colleague.
- Carefully consider the needs and circumstances of the young person when in one-to-one situations.
- Adhere to the expectations, procedures and standards detailed in related company policy.

Staff must:

- Abide by the conditions of each young person's ICMP and Safety Plan.
- Complete a DETAIL RECORD SHEET if there are any significant events arising from one-to-one contact.
- Refer to the Director if a disclosure is made during one-to-one situation, taking care to Include one-to-one situations in the young person's Safety Plan if there is thought to be an identified risk (i.e. the young person may seek to take advantage of a new or inexperienced member of staff).
- Staff must always act and maintain professional boundaries in relation to any physical contact they may have with any young person who accesses our services.

- Staff must be always mindful of the need to maintain professional boundaries in relation to any physical contact with young people.
- Staff must respect a young person's personal space and do not 'invade' this without good cause.
- Staff must speak up to their line manager (and or the latter's line manager) should they have any concerns about any staff practice concerning any physical contact with any young person.
- Staff must avoid being overly familiar with any young person.
- Staff must be mindful of any tactile behaviour that they, staff and or young people have and ensure that appropriate professional and physical contact boundaries are maintained.
- Staff must only physically comfort a young person only in the presence of other staff.
- When staff are on their own with young people, they must avoid all physical contact.
- The team manager/team leader must ensure that all staff have regular supervision so that any issues concerning physical contact can be discussed, including any concerns about their colleague's interaction with young people.
- The team manager/team leader and staff must ensure that all young people know how to complain, and are encouraged to speak up, should they have concerns about a member of staff.

There may be occasions when a distressed young person needs comfort and reassurance. This may involve physical contact. Staff should use their professional judgement to comfort or reassure a young person in a way that is appropriate (i.e. not sexual or "familiar"), whilst maintaining clear professional boundaries.

All staff must:

- Consider the way in which they offer comfort and reassurance to a distressed young person and do it in a way that is appropriate to their age.
- Take care in offering reassurance in-one to-one situations, and always record actions.
- Never touch a young person in a way that may be considered indecent or inappropriate.
- Record and report situations that may give rise to concern from either party.
- Staff must never assume that all young people seek or require physical comfort if they are distressed. It is more likely that young people accessing our supported accommodation would require time, space and advice.

There may be occasions and circumstances in which adults will need to make decisions in the best interests of the young person, where no guidance exists. Individuals are expected to make judgements about presenting behaviour to secure the best interests and welfare of the young people. Such judgements should always be recorded.

- Staff should always consider whether their actions are warranted, proportionate, safe and applied equitably.

Chapter Twenty-Two

Public Confidence & Professional Standards

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of the young people. It is expected that all staff, in all roles, will adopt high standards of personal conduct to maintain the confidence and respect of the children, young people, their colleagues or the public in general and all those with whom they work.

For example: misuse of drugs, alcohol or acts of violence would be examples of such behaviour.

Staff should therefore understand and be aware that safe practice also involves using judgement and integrity about behaviours in places other than the work setting.

The behaviour of a staff members' partner or other family members may raise similar concerns and require careful consideration by an employer as to whether there may be a potential risk to young people.

Staff must:

- Be aware that behaviour in their personal lives may impact upon their work with young people.
- Understand that the behaviour and actions of their partner (or other family members) may raise questions about their suitability to work with young people.
- Comply with company policy, specifically duties and responsibilities around behaviour and conduct.

Staff must not:

- Behave in a manner that would lead any reasonable person to question their suitability to work with young people or act as a role model.
- Make, or encourage others to make, unprofessional personal comments that scapegoat, demean or humiliate, or which might be interpreted as such.
- Our recruitment and selection procedures are in place to help deter, reject or identify people who might abuse children or young people or who are otherwise unsuited to work with them. A relevant member of the Senior Management Team (SMT) will lead the process of making staff appointments and delegate duties and responsibilities as appropriate, in consultation with the Managing Director.
- Solace Partnerships Limited are committed to safeguarding and promoting the welfare of young people who access our services. All staff are expected to share this commitment.
- The transporting of young people is only conducted in exceptional circumstances, as ordinarily young people are expected to make their own travel arrangements in supported accommodation.

Information must never be used to intimidate, humiliate, or embarrass a child or young person. Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the child or young person's identity does not need to be disclosed the information should be used anonymously.

All staff must:

- Be clear about when information can be shared and the circumstances it is appropriate to do so.
- Treat information they receive about children and young people in a discreet and confidential manner.
- Seek advice from the DSL if they are in any doubt about sharing information they hold or has been requested of them.

Staff should refer to our Data Protection Policy for more information and guidance.

Guests

Young people living in Solace Partnerships Supported Accommodation have the right to receive guests and it is important that they maintain positive relationships with those who are significant to them. However, we understand that not everyone known to young people or seeking to befriend young people will have a positive impact upon them or those around them. Therefore, young People accessing Tier One (24/7 On-site Staff Support) are required to complete a Guest Request Form (GRF). This is to ensure that reasonable measures are taken to promote the welfare of all young people living within the service and the staff who support them. The conditions applied to guests are detailed in the "House Rules" and must be explained during the admission process as part of the Placement Agreement.

Guests (Visitors & Overnight Stays) (Staff Procedures)

Staff must exercise reasonable judgement regarding the appropriateness of any potential guest. Reasonable measures must be adopted to promote the welfare of all young people in the accommodation, as well as the staff who support them. The conditions applied to guests are detailed in the "House Rules" and must be explained during the admission process. The House rules are agreed collectively, but certain "non-negotiables" will remain in place as would be expected in any family home with responsible boundaries of conduct and interaction.

Staff must be particularly aware of significantly older young people and adults seeking to befriend young people. For example, a girl of 16 years engaged in a "friendship" with an adult of 26 years should alert staff to a significant area of concern, such as CSE for example. Therefore, staff should recognise the potential for: Solace Safeguarding Policy

- A power imbalance that could lead to harm.
- Grooming for abusive and criminally exploitative purposes (including county lines and CSE).
- Relationship abuse and VAWG; and
- Sexual and emotional abuse.

If in any doubt, staff must raise concerns with Director or DSL. Staff must also be fully aware of the indicators linked to the above safeguarding issues (as referenced in this policy and related safeguarding policies), and therefore able to make safe and informed decisions.

Known risks to children must be identified within Safety Plans. The importance of staff reading and understanding the conditions of a child's Safety Plan cannot be over-stated. Therefore, the Registered Manager must seek to ensure that all staff remain up to date with every child's Safety Plan.

In all circumstances staff must liaise with the child's social worker and any other adults with parental responsibility if there are concerns about the suitability of a friendship, with concerns escalated to the Registered Manager if it is considered that there is a potential for harm.

Chapter Twenty-Three

Multi–Agency Working, Resources and Training - Norfolk Safeguarding Children Partnership

Solace Partnerships works in accordance with the aims of Norfolk Safeguarding Children Partnership and principles of ‘Working Together’ in making sure children are protected from harm and that their welfare is promoted.

In September 2019 the Norfolk Safeguarding Children Board transitioned to the Norfolk Safeguarding Children Partnership.

The Partnership will operate in line with the requirements of the Children and Social Work Act, 2017 and the statutory guidance Working Together to Safeguard Children, 2018. The Partnership will cover the geographical area of the county of Norfolk as defined by local authority boundaries. This footprint corresponds with that of the Norfolk Constabulary and that of the five Clinical Commissioning Groups, which also cover the district of Waveney in Suffolk. The strategic lead CCG for children’s services is currently Great Yarmouth and Waveney CCG and these arrangements will be supported through any reconfiguration of CCG governance. The safeguarding partners and other relevant agencies and organisations included in these arrangements will fulfil their statutory duties to safeguard and promote the welfare of children from Norfolk who live or are placed outside the local authority area. The Partnership will continue to seek assurance that all relevant partners meet their duties under Section 11 of the Children Act, 2004, where this applies, or have equivalent standards.

Information for Contractors and Visitors

Our Safeguarding responsibility extends to ensuring all adults in our premises have guidance to follow. Please give out a version of this guidance to all contractors and visitors to your service.

To All Contractors

Thank you for working at a property managed by Solace Partnerships. We can all play a part in keeping children, young people and vulnerable adults (our service users) safe while working in our services.

This includes visiting a service user as part of your role or when working as a contractor, sub-contractor or volunteer. We must also take steps to keep ourselves safe. We want to promote safe working practices for everybody working on a Solace Partnerships site whatever your role.

PLEASE:

- Wear a visitors badge/ID badge at all times and follow sign-in/out instructions.
- Agree with staff what areas of the building/premises you are working in and inform them of any changes to your plans.
- Be aware verbal interaction with children, young people or vulnerable adults may be misinterpreted as offensive or harassment even if this was not your intention.
- Do not leave tools or other work equipment unattended.
- Do not share personal information (e.g. phone numbers, social media details) with service users.
- Avoid, as far as possible, being in an unsupervised 1:1 situation with a child, young person or vulnerable adult unless agreed with TBF staff on site.
- Do not use a personal mobile phone and restrict work mobile phone use to staff rooms or office areas.
- Do not take pictures of service users.
- Talk to a member of staff if you see anything or hear anything which concerns you or makes you worried about your own safety or the safety of a service user. If you do not feel comfortable talking to a member of staff or your concern is about the staff, please call our main office as soon as possible.
- Keep any personal information you hear or observe while working on our premises confidential.

Thank you for following this advice and keeping yourself, and our children, young people and vulnerable adults safe.

APPENDIX 1

Definition of supported living accommodation (unregulated)

“This level of care usually reduces over time and does not include the provision of meals, medication, personal care etc. The young people are free to come and go as they wish. Staff may be present for parts of the day and even overnight for security reasons but are not providing direct care. These are unregulated settings and can operate without registration”.

Criteria Yes? No?		
The young people go out of the establishment without staff permission?		
Do young people have full care control of their own finances?		
Do young people have full control over what they wear and of the resources to buy clothes?	Supported accommodation	Care
Are young people in charge of meeting all their health needs, including such things as arranging GP or specialist health care appointments? Are young people in full control of their medication?	Supported accommodation (Young people may ask for advice and help on their health, but if decisions rest with the young person, the establishment is not providing care.)	Care
Do staff have any access to any medical records?		
Can young people choose to stay away over night?	Supported accommodation (Being expected to tell someone if they are going to be away overnight does not indicate providing care but needing to ask someone’s permission does.)	Care
Is there a sanctions policy that goes beyond house rules and legal sanctions that would be imposed on any adult?	Care	Supported accommodation
If the establishment accommodates both adults and young people, do those under	Care	Supported accommodation

eighteen have any different supervision, support, facilities or restrictions.		
Are there regularly significant periods of time when young people are on the premises with no direct staff supervision?	Supported accommodation	Care
Do staff have any responsibility for aftercare once a young person has left?	Care (Some supported accommodation services will offer some support to help young people get established in their next accommodation is not care.)	Supported accommodation
Does the establishment's literature promise the provision of care or relate to specific care support provided to all residents?	Care	Supported accommodation
Does the establishment provide or commission a specialist support service, which forms part of the main function of the establishment?	Care	Supported accommodation

5.0 Supporting Information, Documents, Legislation References or Other Resources.

- This policy has been drawn up on the basis of law and guidance that seeks to protect vulnerable people, including (but not exclusively):
 - Children Act 1989 and 2004
 - Sexual Offences Acts 2003
 - Safeguarding Vulnerable Groups Act 2007
 - Protection of Freedoms Act 2012.
 - Child sexual and/ or criminal exploitation
 - Guidance for families, professionals and the community
 - Every child protected against trafficking
 - Potential Indicators of Children who may have been Victims of Modern Slavery
 - Solace Partnerships complies with the Department for Education 'Keeping Children Safe in Education' statutory guidance:
 - <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

- Working together 2018
- Care Act 2014.
- Caring for Young People and the Vulnerable
- Childcare Act 2006
- Children (Leaving Care) Act 2000 Regulations and Guidance (Department of Health, 2000)
- Children (Leaving Care) Act 2000.
- Children and Families Act 2014.
- Children and Social Work Act 2017
- Common Law Duty of Care
- Counter-Terrorism and Security Act 2015
- County Lines Gang Violence, Exploitation & Drug Supply 2016
- Criminal Exploitation of Children and Vulnerable Adults- County Lines Guidance (2017)
- Equality Act 2010
- Keep on Caring (Supporting Young People from Care to Independence) (DfE, July 2016).
- Keeping Children Safe in Education (2020)
- Mental Capacity Act 2005
- Police Act 1997
- Police Reform and Social Responsibility Act 2011
- Preventing and Tackling Bullying (July 2017)
- Protection of Freedoms Act 2012
- Putting Children First (Delivering Our Vision for Excellent Children's Social Care) (DfE, July 2016).
- Safeguarding Vulnerable Groups Act 2006
- The Children Act 1989
- The Police Act 1997 (Criminal Records) (No 2) Regulations 2009, as amended
- The Police Act 1997 (Criminal Records) Regulations 2002, as amended
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- The report of Her Majesty's Chief Inspector of Education, Children's Services and Skills (Ofsted, 2016).
- The Sexual Act 2003
- What to do if you're worried a child is being abused (2015)
- Working Together to Safeguard Children (July 2018)

Related Policies

- Safer Recruitment Policy

Whistleblowing Policy

- Confidentiality Policy
- Data protection Policy
- Equality and Diversity Policy
- Lone Worker Policy

Service User Engagement Policy