

Seashell

Title	Safeguarding Policy 2023
Issue Date	September 2023
Review Date	July 2024
Total Number of Pages	45
Author/Owner	Safeguarding Team (DSLs)
Approval Level	Board of Trustees / Safeguarding Board
Distribution	Trust Wide

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Definition(s)
<p>Staff: The policy applies to all 'staff' – whether working in or on behalf of the education, health, family, care services, support staff as a paid employee including Agency staff, a worker or contractor, or unpaid member of staff or volunteer. It also includes anyone who is part of the Governing Body, Trustees and Directors.</p> <p>Children: A person under eighteen years of age.</p> <p>Abuse: Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.</p> <p>Adult: A person over eighteen years of age.</p> <p>Adult at risk of abuse or neglect: Section 42 <u>Care Act 2014</u> (legislation.gov.uk)</p> <p>(1) This section applies where a local authority has reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there)</p> <ul style="list-style-type: none">(a) has needs for care and support (whether or not the authority is meeting any of those needs),(b) is experiencing, or is at risk of, abuse or neglect, and(c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it. <p>People who use our services: All people who access Seashell services (not staff or volunteers).</p> <p>Child-on-child abuse: Any form of abuse or violence (including harmful sexual behaviour) between children under eighteen years of age.</p> <p>Adult at risk-on-adult at risk: Any form of abuse or violence (including harmful sexual behaviour) between adult service users over eighteen years of age.</p> <p>Designated Safeguard lead (DSL): Provides support to all staff to carry out their safeguarding duties and works closely with other services such as local authority children's and adult's social care.</p> <p>Deputy Designated Safeguard Lead (DDSL): Will deputise for the DSL when they are off site.</p>
Purpose
<p>The purpose of this policy to ensure that all staff have ready access to information and guidance to enable them to deal confidently and appropriately with any safeguarding concern or incident of abuse. Staff need clear guidelines to ensure best practice and adherence to legal and statutory directives.</p> <p>Given Seashell operate services across adult and child services in education, residential care, outreach, sports, family services and in the community, this policy serves to reflect the fact that safeguarding is everyone's responsibility.</p> <p>This policy should be read and followed by all staff across all departments associated with the Seashell. The Policy applies at all times when Seashell is providing services or activities directly under the management of the Seashell Trust. It is publicly available on the organisation's website and a printed copy (in English or other languages) can be made available via the CEO office.</p> <p>This Policy adopts and reflects best practice standards across all ages and cuts across specific departmental objectives to reflect best practice across all our services by drawing in the most relevant and robust safeguarding legislation and guiding principles.</p>

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<p>Intended Outcomes</p> <p>All staff working at the Seashell share a responsibility for the protection and well-being of all people who use our services. It is everyone's responsibility to ensure the people who are vulnerable are safeguarded and protected from abuse.</p> <p>The policy describes the best practice standards and expectations across all our services to protect people who use our services from maltreatment or abuse.</p> <p>This policy has two sets of procedures that steer actions for 1) a child or 2) an adult or adult at risk. There is a clear demarcation in these procedures in section 2.</p>
<p>Link to Mission / Statement of Purpose</p> <p>Mission - Seashell helps children and young adults with the most complex needs, and their families to live their best lives.</p> <p>Vision Seashell aims to be exceptional in educating and caring for children and young adults with the most complex needs, with an amazing workforce supporting families from its world class campus, and to share its excellence on a national and international platform.</p> <ol style="list-style-type: none"> 1. To provide exceptional education, care, and health & wellbeing support for our children and young adults with safeguarding as the highest priority. 2. To promote the voice of children and young adults and their families through co-production to inform the design and delivery of services and influence national policy. 3. To achieve meaningful outcomes after Seashell through successful transitions to high quality and sustainable employment, education, and social opportunities. 4. To continue to transform our site to ensure high quality facilities for our children and young adults as well as playing a valued role in the broader community. 5. To develop and share our specialist knowledge and skills nationally and internationally. 6. To be an employer of choice with a culture of continuous improvement through investment in our exceptional workforce. 7. To ensure long term financial security through the development of fundraising and other income generating activities. <p>The Safeguarding Policy and Safeguarding Strategic Aims supports the delivery of Seashell's Mission, Vision and Strategic Objectives. The Policy and Safeguarding Strategic Aims are reviewed annually to ensure they align and support Seashell's strategic objectives.</p>
<p>Guiding principles and reasons for the Policy</p> <p>Safeguarding and promoting the welfare of all people who use our services is everyone's responsibility. Everyone has a role to play, and Seashell adopts a culture of safeguarding across all our services to promote and embed safeguarding practice. In accordance with relevant law and guidance this policy details our procedures for safeguarding, child protection and adult at risk procedures and it is applicable to the whole Seashell community.</p>

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If people who use our services and their families are to receive the **right support, right care, right culture** – ([Right support right care right culture \(cqc.org.uk\)](http://Right%20support%20right%20care%20right%20culture%20(cqc.org.uk)), s.23 [Health and Social Care Act 2008 \(legislation.gov.uk\)](http://Health%20and%20Social%20Care%20Act%202008%20(legislation.gov.uk))) then everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt and restorative action. Similarly, as detailed in the recent Special Educational Need Review (SEND) 2022 [Summary of the SEND review: right support, right place, right time - GOV.UK \(www.gov.uk\)](http://Summary%20of%20the%20SEND%20review%3A%20right%20support%2C%20right%20place%2C%20right%20time%20-%20GOV.UK%20(www.gov.uk)), in order to thrive, children and young people require access to the **right support, in the right place, and at the right time**, so they can fulfil their potential and lead happy, healthy and productive adult lives and Seashell are a part of this important journey.

In line with this understanding, any member of staff working in the Seashell community has a responsibility to recognise, respond, record and refer safeguarding concerns in a timely and appropriate way.

 Seashell works continuously to build and maintain an effective **culture of safeguarding through our 'Safe at Seashell' approach**. We seek to provide an environment that will help children, adults, staff and families to be safe and to feel safe. All staff and volunteers will ensure that their approach and actions are person-centred – putting the wishes and feelings of the people who use our services at the heart of any safeguarding response. This means that they will consider what is in the best interest of the individual concerned and apply the principles laid out in the [Mental Capacity Act 2005](http://Mental%20Capacity%20Act%202005).

We will work together with our Local Authority partners in Stockport and Greater Manchester, health and public sector services like the Police to safeguard and promote the welfare of all people who use our services.

These are the foundations on which all of Seashell safeguarding, and welfare systems are built:

- Ensuring that all staff and volunteers understand their responsibilities and duty of care;
- Ensuring that all staff are trained to understand the risk factors for all child protection and adults at risk of harm concerns, safeguarding and welfare concerns and know the indicators of abuse, neglect, and exploitation, and know the appropriate reporting mechanism;
- Create and maintain a positive culture of safeguarding and an environment where all people who use our services feel secure, are encouraged to communicate any concerns and are listened to;
- Ensuring that all people who use our services understand that they can report any concern to any member of staff, knowing they will be believed and never made to feel like raising a concern is a problem;
 - o Community users can raise a concern directly with a member of staff and be confident it will be escalated to a Designated Safeguarding Lead.
 - o 24 hour on-call co-ordinator and Designated Safeguard Lead / Deputy Designated Safeguard Lead, safeguarding contact number on reverse of identification swipe access pass.
 - o Safeguarding contact posters and allegation management flow charts, body map protocol flowchart
 - o Cause for concern online portal direct to safeguarding leads for low threshold, non-emergency concerns.
 - o Seashell Speak Up – clearly identifies the route to use if any user or stakeholder wants to raise a concern and how to escalate this

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- Ensuring that staff listen / observe victims and know how to report any concerns about sexual violence or harassment between peers;
- Having a procedure to deal with any issues of child-on-child or adult at risk-on-adult at risk abuse which includes a robust and credible reporting system called Behaviour Watch which is well-promoted, accessible, and simple to understand;
- Teaching people who use our services to keep themselves safe, including online, from all forms of abuse, bullying, harassment, or exploitation through different platforms dependent on which service is accessed (i.e. education curriculum, residential care activities, other interactive means, communication and social stories);
- Respecting the guiding principles within the Mental Capacity Act 2005;
- Swiftly and effectively addressing any child protection, adult at risk or safeguarding concerns and ensuring robust, timely referrals are made to other agencies in line with local safeguarding protocols.
- Ensuring effective links with relevant agencies in all matters regarding safeguarding, child protection, adult at risk, including Early Help procedures;
- Supporting Care Leavers as they transition from child to adult services and maintaining robust transitional procedures for all departing from our services to comply with multi-disciplinary collaboration and information sharing protocols.
- Keeping written records of concerns about people who use our services, even where there is no need to refer the matter immediately (this includes recording dates, times, people responsible, and actions), and ensuring all records are kept securely and shared appropriately in line with the [Data Protection and Caldicott Policy 2022](#)
- Ensuring the suitability of all staff through safer recruitment practice and maintaining an accurate and up-to-date Single Central Record;
- Maintaining clear procedures in line with the latest guidance for reporting allegations against staff members;
- Ensuring that parents and carers also understand the responsibility placed on the Seashell and its staff for safeguarding, child protection and adult at risk procedures;
- Maintaining awareness of those people who use our services who are persistently absent or missing from school, missing from home, and notifying the Local Authority in line with 'Children Missing in Education' and 'Children Missing from Home' protocols and the Herbert protocol.

Equality Analysis

The Trust recognises the need for specific measures to ensure equality of opportunity to all of these groups with protected characteristics. Some people who use our services are at increased risk of abuse and face additional barriers with respect to recognising or disclosing abuse.

Consideration is given to the protected characteristics of all groups identified in the Equality Act 2010. The protected characteristics are gender, age, race, disability, sexual orientation, gender reassignment, religion/belief, pregnancy and maternity, and marriage/civil partnership.

Seashell is committed to the **Social Model of Disability** and embraces diversity, promoting anti-discriminatory practices across all age groups that respects protected characteristics outlined in the [Equality Act 2010](#)

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(legislation.gov.uk). Moreover, compliance with the [Mental Capacity Act 2005 \(legislation.gov.uk\)](http://legislation.gov.uk) is embedded in our service provision to promote autonomy, independence and person-centred planning, and although this Act refers to individuals 16 years plus, the Seashell promote capacity and consider consent across all groups. We ensure that all people who use our services have the same protection that respects diversity in the following areas:

- Have special educational needs (SEN) or disabilities
- Are young carers
- Show signs of mental health problems
- Are missing education
- Are engaging in periods of missing from home
- May experience discrimination due to their disability, race, ethnicity, religion, gender identification, or sexuality
- Are at risk of Female Genital Mutilation (FGM), sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers
- Have English as an additional language
- Are known to be living in difficult situations e.g., where there are issues at home, such as substance abuse/misuse, domestic abuse, or where a family member is in prison or has mental health needs.
- Are at risk due to either their own or a family member's mental health needs
- Are within the care system and are looked after or have been previously looked after or have a social worker.
- Have a parent/carer who has expressed an intention to remove them from education to be home educated.

Accessibility

The duty to make reasonable adjustments, as far as possible, to ensure that all staff and people who use our services (and others where the Trust has a duty-of-care) with a disability have equal access to everything they need to do a job or studies as those persons without a disability.

The Designated and Deputy Designated Safeguarding contact details:

(See appendix one or [Safe at Seashell - DSL poster May 2023.pdf \(seashelltrust.org.uk\)](#))

Designated Safeguarding lead (DSL) **NIKOLA GILES**

Nikola.giles@seashelltrust.org.uk 0161 610 0116

On-call Safeguarding lead contact number 24 hours a day/ 7 days a week - 0774 290 4949

Education Deputy Designated Safeguarding Lead (DDSL)

Director of Education	Bernie.white@seashelltrust.org.uk	0161 610 0120
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Head of School	Emma.houldcroft@seashelltrust.org.uk	0161 610 0172
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Head of College	Clare.sefton@seashelltrust.org.uk	0161 610 0150
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Residential Care Services Deputy Designated Safeguarding Leads (DDSL)		
Director Care	Bernie.white@seashelltrust.org.uk	0161 610 0120
Head of Service: Young Adults	Debbie.Gittins@seashelltrust.org.uk	0161 610 0746
Registered Manager Children's Short Breaks	Jenny.Ritchie@seashelltrust.org.uk	0161 610 0403
Head of Children's Residential Services	ben.bainbridge@seashelltrust.org.uk	0161 610 0169
Health Deputy Designated Safeguarding Leads (DDSL)		
Head of Clinical Services Development	Tamsin.Rowbotham@seashelltrust.org.uk	0161 610 0136

Wider contacts at Seashell contact information of Heads of Service in support services and departmental team leaders can be found in **appendix two**.

Stockport Local Authority safeguarding and contact numbers.

If you are concerned about extremism , or if you think a child might be at risk of extremism, contact the helpline on 020 7340 7264 or counter.extremism@education.gov.uk		
	During Office Hours	Out of office hours
Adults	0161 217 6029, Monday to Thursday from 8:30am to 5pm and Friday from 8:30am to 4:30pm. For Minicom call 0161 217 6024. <u>Report a concern about abuse of an adult - professionals only - Stockport Council</u>	Out of hours emergencies call us on 0161 718 2118.
Children	All professional referrals should be completed through the online forms. <u>Contacting the MASSH - Stockport Council</u> However, if it is your professional judgement that the MASSH require this information immediately as the child has suffered significant harm or is at risk of immediate harm you should call 0161 217 60280	Out of hours emergencies call us on 0161 718 2118.
Health Advice	Non-emergency 111 <u>Get medical help - NHS 111</u> Emergency 999	
Criminal Offences	Non-emergency 101 Emergency 999	

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ALLEGATIONS REGARDING PROFESSIONALS WHO WORK WITH CHILDREN	
Local Authority Designated Officer (LADO) Children’s workforce: GILL MOORE	
<p>Gill Moore – (Designated Officer for the Local Authority), Stockport Council Safeguarding Children Unit Stoford house Stockport SK1 3XE</p> <p>Email: gill.moore@stockport.gov.uk</p> <p>Work mobile: 07866 999 583</p> <p>Office: 0161 474 5657 (Reception-checked hourly)</p>	<p>If a child is at immediate risk of harm, call the police on 999.</p> <p>The LADO is the single point of contact for professionals to report allegations, request advice and share information regarding a concern or allegation against an employee, volunteer or another professional working with, or providing services to, children and young people under the age of 18 in Stockport.</p> <p>All professional referrals should be completed through the online form after consultation with the DSL/ on-call DDSL. <u>Contacting the LADO (Local Authority Designated Officer) - Stockport Council</u></p> <p>However, if it is your professional judgement that the LADO requires this information immediately, you should call 0161 474 5657. After your discussion with the LADO, you may be advised to complete the online form.</p> <p>Refer to Appendix 3 Allegation Management Flowchart</p>
ALLEGATIONS REGARDING PROFESSIONALS WHO WORK WITH ADULTS:	
<p>Adult Social Care Contact Centre</p> <p>Email: adultsocialcare@stockport.gov.uk</p> <p>0161 217 6029, Monday to Thursday from 8:30am to 5pm and Friday from 8:30am to 4:30pm.</p> <p>For Minicom call 0161 217 6024.</p> <p>For out of normal office hours, call 0161 718 2118.</p>	<p>If an adult is in immediate danger you should call the police on 999. If the adult is not in danger now, call 101.</p> <p>If you have concerns that someone in a position of power or trust may be causing immediate harm to an adult, please report your concerns to the on-call DSL/ DDSL at Seashell. All professional referrals should be completed through the online form after consultation with Stockport Adult Social Care:</p> <p><u>Report suspected abuse or neglect - Stockport Council</u> 0161 217 6029, or 0161 217 6024 for the Minicom or online</p> <p>Refer to Appendix 3 Allegation Management Flowchart</p>
Safeguarding children	
Safeguarding and promoting the welfare of children is outlined in Working Together to Safeguard Children 2018 (Working Together to Safeguard Children 2018 (publishing.service.gov.uk)) and Keeping children safe in education 2023 (publishing.service.gov.uk) and is defined as:	
<ul style="list-style-type: none"> protecting children from maltreatment 	

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- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes
- Child Protection is a part of the safeguarding agenda and is covered under this policy. It refers to the action that is required to be undertaken to protect children who are suffering, or are likely to suffer, significant harm.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Safeguarding adults at risk of abuse or neglect:

- Adults at risk of abuse or neglect may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. [Care Act 2014 \(legislation.gov.uk\)](http://legislation.gov.uk)
- In conjunction with the Care Act 2014 (s1.2), this also includes the promotion of well-being that includes but is not limited to (a) personal dignity (including treatment of the individual with respect); (b) physical and mental health and emotional well-being; (c) protection from abuse and neglect; (d) control by the individual over day-to-day life (including over care and support, or support, provided to the individual and the way in which it is provided).
- Protecting their right to liberty and security, [Human Rights Act 1998 \(legislation.gov.uk\)](http://legislation.gov.uk)
- Making sure people's wellbeing is promoted, taking their views, wishes, feelings and beliefs into account. [Mental Capacity Act 2005 \(legislation.gov.uk\)](http://legislation.gov.uk) [Safeguarding people - Care Quality Commission \(cqc.org.uk\)](http://cqc.org.uk)

Safeguarding the people who use our services

- Seashell recognises that sharing information, particularly with safeguarding partner agencies and other professionals, in a timely manner is crucial in identifying and tackling all forms of abuse and neglect.
- Seashell understands that fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children and adults at risk. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children and adults at risk safe. The organisation recognises the government's seven golden rules of information sharing. Where any doubt exists, staff will seek support from the Head of Service and the DSL.
- Recognises that, to facilitate the sharing of 'special category personal data,' the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent. If it is not possible to gain consent, or if to gain consent would place a people who use our services at risk, it cannot be reasonably expected that a practitioner gains consent.
- Recognises the importance of confidentiality in all data the organisation holds and in particular in relation to safeguarding and child protection records.

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- Will identify people who use our services who may benefit from the Early Help process and make timely disclosures to the Local Authority to enable that process to begin, working with safeguarding partners and other professionals to assist with these assessments and work flowing from these assessments.
- Recognises that mental health issues can be an indicator of abuse and neglect and will share any such concerns appropriately.
- Will identify people who use our services who may be suffering from significant harm, suspected abuse or neglect and make child protection or adult at risk referrals.
- Will identify people who use our services who need extra help and make appropriate referrals, including to early help processes, to prevent concerns escalating.
- Seashell complies with the [The Caldicott Principles - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- Records will be created by the Safeguarding Team to define the decisions made in each instance of Data Sharing, specifying what, how who to.

The Seashell also understands the importance of contextual safeguarding, i.e., that incidents or behaviours can be associated with factors outside home or school and can occur between children outside of the Seashell's provision of services.

All staff should be considering wider environmental factors that are present in a person's life which are a threat to their safety and/or welfare. This information will also form part of any referrals the organisation makes if this is appropriate. The Seashell also recognises the importance of partnership working to keep people who use our services safe and work in partnership and collaboration with the Stockport Safeguarding Children Partnership [Safeguarding Children in Stockport](#) and Safeguarding Adults in Stockport ([Safeguarding Adults in Stockport](#)).

People with special educational needs, disabilities or health issues

People with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood, and injury relate to the individual's condition without further exploration.
- The fact that this cohort are at greater risk of social isolation or marginalisation (including discrimination).
- The fact that this cohort are at increased risk of abuse and exploitation whether from peers, those who seek to harm children or adults at risk, or criminal gangs.
- The potential for people with SEND or certain medical conditions to be disproportionately impacted by abusive behaviours, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

The Seashell seeks to address this issue through raising awareness amongst staff, offering tailored support, and ensuring communication with people who use our services, and their families and carers is effective. It may also involve referral to CAMHS or supporting any such referral. Service User Voice forums are also in situ and departments across the Seashell seek the views of all people who use our services.

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Working with parents/carers and individuals with parental responsibility and Court of Protection
Seashell recognises the importance of working, where appropriate, in partnership with parents and carers to promote welfare and safety. The Seashell will therefore:
<ul style="list-style-type: none"> • Make parents/ carers aware of the Seashell's statutory role in safeguarding and promoting the welfare of individuals, including the duty to refer individuals on, where necessary, by making all policies available on the website and on request. • Work with parents/ carers to raise awareness of threats posed online. • <i>Children:</i> Seashell will notify the parents or carers of children where there are significant safeguarding concerns and where there is no increased risk to the child or others by doing so. Wherever necessary, we will discuss this with the Local Authority children's social care team before doing so. • If the proviso above is satisfied, Seashell we will normally notify the parents or carers of any service user involved (if relevant and appropriate) if there has been an allegation against a member of staff that has been referred through statutory procedures. Statutory procedures dictate this process and the timeline for notification will vary depending on the circumstances of each case. Parents/ carers will not be provided with any data protected or restricted information to retain the integrity of any potential investigation. • Ensure a robust complaints system is in place to deal with issues raised by parents and carers. Compliments and Formal Complaints Policy and Procedure (seashelltrust.org.uk) • Provide advice and signpost parents and carers to other services where people who use our services need extra support. • Endeavour to acquire the necessary information to support any Court of Protection procedures or orders to comply with this standard for adult service users.
Procedures hyperlink (see appendix 4)
Children – Immediate danger or risk of harm
Children – Cause for concern (no immediate risk of harm)
Adults – Immediate danger or risk of harm
Adults – Cause for concern (no immediate risk of harm)
Low level concerns procedure
Safe at Seashell Body Map flowchart
Safe at Seashell Body Map flowchart for managers
Allegation Management procedure (appendix 3)
If a DSL or DDSL is available (on-call 24 hours a day at Seashell)
If a member of staff suspects that a person using our services may have been subject to abuse, neglect, or exploitation - or where there is a concern that abuse has taken place - the DSL / on-call DDSL must be informed immediately.
<ul style="list-style-type: none"> • The DSL/ on-call DDSL must ensure the allegation is acted on immediately and determine the most appropriate course of action. • Where the allegation reveals a risk of significant harm or the service is in immediate danger, the DSL/on-call DDSL will refer the matter to the police and/or children's or adult's social care.

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If the concern meets the threshold for intervention, the Local Authority children's social care will begin assessments and investigations under the [Children Act 1989 \(legislation.gov.uk\)](http://legislation.gov.uk), normally under Section 17 or 47. It may be that the DSL or a member of staff will be asked to be involved in these assessments – if this is the case, the DSL will offer support to all members of staff.

If the concern meets threshold for intervention, adult social care will begin assessments and investigations under the [Care Act 2014 \(legislation.gov.uk\)](http://legislation.gov.uk), normally under Section 42. It may be that the DSL or a member of staff will be asked to be involved in these assessments. The DSL will offer support to all members of staff.

If a DSL or DDSL is not immediately available

- When people who use our services are in immediate danger or at risk of significant harm, and the DSL/ on-call DDSL or a key safeguarding contact is **not** available, a referral should be made to children's or adult's social care and/or the police immediately.
- Anyone can make a referral to the police in an emergency, or to children's and adult's services if there is a child protection or adult at risk concern.
- Where staff have a concern that does not raise an issue of either immediate harm or a risk of significant harm, the staff member should not delay and speak to a member of the Senior Leadership Team, Deputy Designated Safeguard Lead or Head of Service or contact the Local Authority children's or adult's services to determine the most appropriate way to proceed.
- Staff **should not assume** that somebody else will take action/share information that might be critical in keeping people who use our services safe.
- Where referrals are not made by the DSL, the DSL should be informed, as soon as possible, that a referral has been made.
- Teaching staff and other regulated professionals are responsible for reporting concerns relating to **FEMALE GENITAL MUTILATION (FGM)** and reporting is mandatory where either the individual:
 - Is informed by a girl under 18 that an act of FGM has been carried out on her; or they
 - Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.
 - More detailed guidance can be found here [Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
 - Discuss the concern with the DSL, who will offer support and help.
- Where the risk is less serious, the DSL may start the procedure for Early Help. This may be a multi-agency response, and the relevant department may be asked to lead on this process as the lead professional. Staff may be asked to have input in this process. If, at any time during Early Help, those involved consider the risk to the people who use our services has escalated, the matter must then be referred to the relevant social care department.

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<p>The role of the on-call safeguarding lead – (DSL and DDSL):</p> <ul style="list-style-type: none"> • Being the point of contact for staff who have a concern about a people who use our service's welfare, safeguarding, or an adult/ child protection issue, including where the concern involves a mental health issue. • Being available all year round - this can (in exceptional circumstances) be via Microsoft Teams or other media if they are not physically on-site during term time for staff, volunteers, parents, or people who use our services to provide advice and support on welfare, safeguarding, adult and child protection matters. • Acting as a point of contact for safeguarding partners - for example, the police in relation to <u>Operation Encompass</u> (an initiative to ensure that schools have timely information about all police attended incidents of domestic abuse) and, where required, taking part in and contributing to strategic discussions and interagency meetings, and supporting other staff to engage with this process. • Being available all year round - this can be via Microsoft Teams or other media if they are not physically on-site during term time for staff, volunteers, parents, or people who use our services to provide advice and support on welfare, safeguarding, adult and child protection matters. • Liaising with other staff (as required) - for example, therapists, nurses, mental health leads and external partners like SENCo's or education teams - when referring matters to children's or adults social care, so that the reports are as holistic as possible. • Ensuring that account is taken of the risk to people who use our services outside of their families and considering whether people who use our services are at risk of abuse relating to exploitation and serious violence. • Where a safeguarding concern has a mental health element, ensuring discussions are had with the senior lead for mental health. • Managing referrals to the Local Authority Children's or Adult Services or other services including the police where a crime has been committed, or to the Channel programme, or the DBS (where someone has been dismissed or has left because of the harm they have caused or the risk of harm they pose to children or adults at risk). • Liaising with other agencies and partners in cases where early help is considered the most appropriate response and contributing to any ongoing support and further assessments. • Working closely with children's and adult's social care and a social worker especially when there is a statutory response and ensuring that actions do not jeopardise an ongoing investigation. • Where social care does not investigate, the DSL/ DDSL should not be afraid to refer again or challenge the decision. If the decision remains not to investigate, the DSL/ DDSL should look for other support such as early help. • Where there has been an allegation/report of sexual violence, the DSL/DDSLS will support by advising the Head of Service how to proceed, including undertaking an immediate risk assessment of need (risk assessments should be considered on a case-by-case basis for reports of sexual harassment). The risk assessment must be dynamic and retained in electronic form and should include: <ul style="list-style-type: none"> o How best to support the victim, whether it is a single victim, the alleged perpetrator, risks to other children or adults at risk. • Taking the lead role in any decisions about sexual violence or sexual harassment which are reported. • Where an allegation is proved to be unsubstantiated, unfounded, false, or malicious, the DSL/ DDSL will consider whether the person who made the allegation needs support for other abuse – and whether the report could be a cry for help. If so, the DSL/ DDSL should consider whether or not to refer to children's or adult's social care. • Where there has been an allegation against a member of staff which is judged to meet the threshold (for referral to the LADO or Adult Social Care), ensuring the people who use our services are not at risk and determining whether or not the case should be referred to social care as a suspected abuse case.

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- Being aware of local protocols and arrangements in respect of the Prevent referrals.
- Being aware of local arrangements for Early Help.
- Being aware of all the local and national support systems in place for victims of sexual violence.
- Being the point of contact for all adult at risk-on-adult at risk and child-on-child abuse reports and being aware of issues and supporting actions where consent or power balances are in issue - for example, in sexual violence reports.
- Making referrals (where appropriate) to the [Cyber Choices: Helping you choose the right and legal path - National Crime Agency](#) when a child may be involved in cybercrime.
- Where a regulated professional reports FGM, deciding whether or not to refer the matter to children's / adult's social care.
- Encouraging a positive culture of supportive engagement with parents/carers around safeguarding and child welfare – this is especially so in circumstances where the family may be encountering challenging circumstances.
- Ensuring people who use our services views are heard by encouraging a culture of listening, taking account of their wishes and feelings, and building trust between people who use our services and staff so that communication and reporting issues is most effective.
- Working with a range of colleagues to promote the educational outcomes of 'children in need' by understanding the extra challenges this cohort can face because of the safeguarding/welfare or child protection issues they have been involved in. Also recognising when adults at risk have additional need for care and support and advocating for access to appropriate support as detailed in the [Care Act 2014 \(legislation.gov.uk\)](#)
- With regards to the Royal College Manchester and the Royal School Manchester, the DDSLs will fulfil obligations by Ofsted
 - o to prepare young people for 'their readiness in steps to further education, employment or training'.
 - o know the cohort of people who use services who have or have had a social worker and ensuring their academic progress, independence and autonomy, attainment, and aspirations in reflected in the multi-agency care plans.
- Promote the social model of disability and provide reasonable adjustments or extra support to assist people who use our services with special needs and disabilities and recognising that even where statutory services support has ended, there can be long term consequences for the people who use our services.
- Sharing information (as appropriate) with staff to achieve these goals for this cohort.
- Providing support for staff so that they are confident about welfare, safeguarding, adult, and child protection issues - including during a referral process.
- Designated and Deputy Safeguarding Leads have a responsibility to understand, implement and follow the UK General Data Protection Regulation / Data Protection Act 2018 (DPA) when making and keeping "detailed, accurate, secure written records of concerns".

Allegations against members of staff:

Where an allegation of abuse is made against a member of staff (including agency staff and volunteers) in relation to a people who use our services, it must be brought to the attention of the DSL, on-call DDSL or Head of Service immediately.

The Seashell has adopted the position outlined in [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](#) wherein there are two levels of allegation management. The first is allegations which meet the threshold for a statutory referral and the second is in relation to low-level concerns.

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(1) Where the allegation meets the threshold for a statutory referral, the DSL/ on-call DDSL or Head of Service will act as the "case manager". They will conduct basic enquiries to ascertain whether there is any foundation to the allegation and will liaise with the Local Authority Designated Officer (LADO) for concerns relating to children or Adult Social Care and other authorities as required.

The threshold may be met in the following circumstances for children:

- They have behaved in a way that has harmed a child or may have harmed a child
- They possibly committed a criminal offence against or related to a child
- They have behaved towards a child or children at risk in a way that indicates they may pose a risk of harm to children.
- They have behaved towards a child or children in a way that indicates he/she is unsuitable to work with either children.

This includes behaviour outside of the Seashell that might make the person unsuitable to work with children in this setting (known as a transferable risk).

The threshold may be met in the following circumstances for adults: ([Care Act 2014 \(legislation.gov.uk\)](#))

- when there is reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there)
 - (a) has needs for care and support (whether or not the authority is meeting any of those needs),
 - (b) is experiencing, or is at risk of, abuse or neglect, and
 - (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

This includes behaviour outside of the Seashell that might make the person unsuitable to work with adults in this setting (known as a transferable risk).

Internal allegation management procedures:

Seashell comply with [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](#) Part 4a: Managing allegations of professional abuse although recognise the different obligations for Adult Social Care reflected in the [Care Act 2014 \(legislation.gov.uk\)](#).

If the Chief Executive Officer, DSL, DDSL or Head of Service is the subject of the allegation, a report will be submitted to the Trustee's immediately, and the Chair of the Trustee's will assume the role of "case manager".

Seashell will employ common sense and judgment, deal with allegations quickly, fairly and consistently and provide effective protection for the child and support the person subject to the allegation.

Appendix 5: Allegation Management Table

(2) Low Level Concerns: Low-level concerns are those which do not meet the threshold for referral to a LADO, Adult Social Care, or the police but, as part of an open culture to safeguarding, should be discussed. Everyone is encouraged to report low level concerns, even by way of a self-referral, so that inappropriate or concerning behaviours are dealt with early and professional boundaries are maintained.

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All information will be held in confidence and securely, in line with data protection laws (the Data Protection Act 2018 and UK GDPR). Records will be reviewed regularly to identify any patterns or systematic issues across the Seashell services. Patterns of staff behaviour could result in a more serious concern that meets the threshold test or results in disciplinary action for an individual. Records will be maintained in line with the Seashell's Data Retention and Disposal Policy and Procedure.

With specific reference to part 4, 'Learning Lessons'(420-421) in [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk) the lessons learned from professional allegations will also be considered and discussed as required in the internal safeguarding meetings and within the Safeguarding Board meetings to enhance scrutiny.

Please refer to the Low level Concern Policy and the 'Best practice process document for safeguarding data'.

Missing from education

Under section 175 of the Education Act 2002 we have a duty to investigate any unexplained absences. At Seashell we follow Stockport's procedures for dealing with children that go missing from school - [missing-from-school-Stockport](#) and adhere the guidance set out by the DfE [Children Missing Education statutory guidance.pdf](#)

All staff are aware that children going missing, particularly repeatedly, are potentially vulnerable to harm including abuse and neglect, such as sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. We also ensure that we are rigorous in our attendance procedures; these are outlined in our attendance policy. Where a child's destination is unknown when they have left our school, we ensure we carry out all necessary checks and refer them as a child missing from education.

Children Missing from Care

Compliance to the [Statutory guidance on children who run away or go missing from home or care](#) is achieved through the Children Missing from Care procedures. Although the majority of people who use our services have a support worker, there can still be times, when a people who use our services may abscond or as a result of neglect or through an act of omission/ breach in duty of care. It is therefore critical that a procedure is in place to manage these instances.

Herbert protocol

Adult care services comply with the requirements laid down within the [Herbert Protocol | Greater Manchester Police \(gmp.police.uk\)](#) to help locate vulnerable people if they go missing.

Abuse and neglect

All staff at the Seashell are aware of safeguarding issues that can put children and adults at risk of harm. It is important not to be complacent about the risks that face our cohort because of their complex learning disabilities and special education needs, physical disabilities, and profound and multiple learning disabilities. However, it

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must be acknowledged that the people who use our services may not necessarily display behaviours that a non-disabled peer may exhibit if they were experiencing exploitation or abuse.

The Seashell take this responsibility very seriously and endeavour to monitor, track and undertake thematic reviews and regular analysis and evaluation of people who use our services throughout their journey within the Seashell. Extreme behaviours or even minor changes are considered holistically and with safeguarding being central to the overall review.

Abuse is a form of maltreatment of another individual (child and/or adult). Somebody may abuse or neglect someone else by inflicting harm or by failing to act to prevent harm. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children. Adults at risk can be abused by minors (under 18 years of age) or other adult(s). In many cases, multiple issues of abuse will overlap.

Categories of abuse vary across children and adult services and more details can be found in **Appendix 6 Specific categories of abuse and types of discriminatory abuse:**

Physical abuse	Financial or material abuse	Sexual abuse	Psychological / emotional abuse
Organisational or institutional abuse	Self-Neglect	Sharing nude/semi-nude images (sexting)	Modern Slavery
Discriminatory abuse	Neglect or acts of omission	Domestic Abuse	Homelessness
Child-on-child / adult at risk-on-adult at risk abuse	Exploitation: Child criminal exploitation (CCE), Serious violent crime, Child sexual exploitation (CSE), Adult sexual exploitation.	So called honour-based abuse: Forced Marriage (FM), Honour-based abuse: Female Genital Mutilation (FGM) (Children under 18 years, The 'One Chance' rule, Adult women (over 18 years of age)	

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Child-on-child (under 18 years), adult at risk-on-adult at risk (over 18 years of age) abuse that requires a safeguarding, child protection or adult at risk response.

- In the case of a violent sexual assault or sexual harassment, the Seashell will follow the latest procedures as set out in Part 5 of [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) and understand that **'it could happen here'**. Refer to appendix 5.
- Staff must record the allegation and report it to the DSL/ on-call DDSL and relevant Head of Service immediately, but never investigate it themselves.
- The DSL/ on-call DDSL will contact the Local Authority children or adult social care team and follow advice, as well as the advice of the police, if the allegation involves a potential criminal offence.
- The DSL and on-call DDSL (supported by the Head of Service as required) will develop a or a **Trauma-Informed Protection Plan** for the victim(s).
- A **risk assessment** (if required) will be developed for all individuals against whom the allegation has been made, with a named person they can talk to if needed. Where there is a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.
- The DSL/ on-call DDSL and the relevant Head of Service can, where appropriate, contact the children and adolescent mental health services (CAMHS) or seek advice from adult mental health providers.

When behaviour causes significant harm to other individuals, staff should follow the safeguarding procedures outlined in this policy. The DSL/ on-call DDSL will refer the people who use our services in line with the local area safeguarding protocol for the children or adults.

Where the issue involves 'sharing nude or semi nudes' (also known as sexting) by using online communications, text, or image messaging, please refer to the online safety policy. The Child Exploitation Online Protection Centre (CEOP) also provides further guidance on sexting at [CEOP Safety Centre](https://www.ceop.gov.uk)

Other guidance is available: [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Seashell pledge to:

- Consider all cases of child-on-child or adult at risk-on-adult at risk abuse and take the appropriate course of action
- Record all child-on-child incidents or adult at risk-on-adult at risk incidents on Behaviour Watch
- Provide 'victim' debriefs and monitor welfare
- Undertake a review of the precursory factors for the 'perpetrator'
- All Behaviour Watch incidents are quality assured, reviewed and form part of a thematic review undertaken by the House Manager (Residential care services) or Senior Teacher in school or Advanced Practitioner in college or relevant key safeguarding contacts in other departments.
- Adhere to the Accident, Incident Behaviour Watch Protocol

Most issues of child-on-child and adult at risk-on-adult at risk abuse can be dealt with through the behaviour policy but where the behaviour raises a safeguarding concern, it falls within the scope of this child protection / adult at risk procedures.

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Seashell recognises that it is important to educate all people who use our services to understand:

- What constitutes appropriate behaviour – including online.
- Issues around consent.
- Issues around discrimination and misogamy.
- Where the criminal law fits into this type of behaviour.

Seashell recognises that child-on-child and adult at risk-on-adult at risk abuse is a problem in mainstream settings and despite the complex learning disabilities of the people who use our services, the Seashell commit to promoting best practice in this area. Consequently, Seashell has put in place procedures and expectations based on the following:

- This type of abuse can occur anywhere including online and it can affect people of any age but is predominantly an issue for secondary and college age groups.
- Staff must maintain an attitude of “**it could happen here**”.
- Downplaying inappropriate behaviour can lead to a culture of unacceptable behaviour and can lead ultimately to normalisation of abuse. It will not be tolerated – we have a zero-tolerance approach to this issue.
- Staff must intervene in “inappropriate” behaviour, which can prevent it from escalating to abusive or violent behaviour.
- It is crucial to have a zero-tolerance approach to sexual violence and sexual harassment, and an important part in this is not tolerating or laughing off sexual banter or jokes.
- Victims of this type of abuse are likely to be distressed and there is a likelihood of it affecting their educational attainment and self-esteem – this is more likely where the alleged perpetrators attend the same services.
- Some people may face additional barriers in reporting because of vulnerabilities, disabilities, sex, ethnicity, and sexual orientation.
- It is extremely important to listen / observe, and record and report concerns and not ask leading questions when people who use our services may disclose abuse.
- Whilst victims’ wishes and feelings are of paramount importance, the Seashell should not forget to balance this with its duty to protect other children and adults on site.
- Where a report is found to be malicious or unfounded, the Seashell should consider what the most appropriate step should be – it might be that the person has been abused by someone else or the allegation might be a cry for help. If the report was deliberately made up, the Seashell will consider using disciplinary processes.

Radicalisation or extremism (Link to [Lock down procedures](#))

- The DSL or Head of Service will be the first point of contact for any issues of concern in relation to extremism.
- If the DSL is not available, staff should speak with the on-call DDSL or Stockport Adults or the Local Authority Children’s social care team. If it is an emergency, the member of staff should **call 999** or the **confidential anti-terror hotline: 0800 789321**.
- There is also a dedicated phone line at the Department of Education which offers help and guidance to staff and governors: call 0207 340 7264 or email counter.extremism@education.gov.uk.

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- The DSL will assess the level of risk and decide which agency to make a referral to. This could include [Channel](#) - the government's programme for identifying and supporting individuals at risk of being drawn into terrorism - or the Local Authority children's social care team [Prevent and Channel in Stockport - Stockport Council](#). Further advice and guidance can also be found here: [ACT Early | Prevent radicalisation](#).

Prevent duty

The Seashell applies the statutory guidance [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#) site-wide to all services. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable individuals to hold extreme views including those justifying political, religious, sexist, or racist violence, or to steer them into an ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The Prevent strategy aims to stop people from becoming terrorists or supporting terrorism. The Seashell takes the view that early intervention is always preferable and includes this in its procedures as it does for all safeguarding concerns. In line with both the fundamental British Values and the School Values, the following key principles underpin the Seashell's commitment to the Prevent strategy:

- Inclusion
- Tolerance
- Freedom of speech
- The expression of beliefs and ideology

Both people who use our services and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility. Free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the principles in which freedom of speech is valued.

Free speech is subject to treating others with respect, understanding differences, equality, an awareness of human rights, community safety, and community cohesion. The Prevent statutory guidance requires establishments to have clear protocols for ensuring that any visiting speakers are suitable, appropriately supervised, and undergo the same checks as other visitors.

The Seashell is committed to training all staff in connection with the issues arising from our Prevent Duty. We are also committed to working with the Local Authority and other local partners to assess the potential risk of individuals being drawn into terrorism, because families and communities play a key role in ensuring young people and our communities are safe from the threat of terrorism.

The DSL will keep up to date with local threats, policies, and procedures relating to Prevent.

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Reducing risks of extremism

The Prevent duty does not ask staff to carry out unnecessary intrusions into family life, but, as with any other safeguarding risk, they must act when they observe behaviour of concern. The DSL, DDSL and Heads of Service will work with partners and the Local Authority's risk assessment to determine the potential risk of individuals being drawn into terrorism. Actions will include:

- Promoting spiritual, moral, social, and cultural development for people who use our services - this includes ensuring that the curriculum promotes fundamental British values, and our residential care, outreach, sports and family services adopt the same values.
- Creating an atmosphere of openness and safety through a positive culture of safeguarding so that people who use our services feel free and able to discuss sensitive topics, including terrorism and extremism.
- Ensuring people who use our services are protected from accessing extremist content online whilst at the Seashell using appropriate filters and families are supported to understand online safety through relevant information sharing and information shared through our internal and external communications.

Potential signs of radicalisation and extremism

Due regard and diligence should be applied given the people who use our services at the Seashell have complex learning disabilities and special educational needs. There is no room for complacency. As with managing other safeguarding risks, all staff will be vigilant to changes in behaviour which could indicate that they may need help or protection. It is commonly recognised that children in particular, who are at risk of radicalisation may display changes in behaviour, show different signs, or seek to hide their views. Staff are advised to use their professional judgement in identifying individuals who might be at risk of radicalisation and always act proportionately and seek support if they are concerned.

There is no limit to the signs that you might notice – everyone is different. However, some of the indicator's staff should look out for include:

- Refusing to listen to different points of view.
- Being unwilling to engage with children who are different.
- Feeling persecuted.
- Changing friends and appearance.
- Converting to a new religion.
- Being sympathetic to extremist ideologies and groups.
- Online activity - changing their identity, having more than one online identity, spending a lot of time online or on the phone, accessing extremist online content, and joining or trying to join an extremist organisation.

Exploitation, FGM or becoming involved in serious violent crime.

Where risk factors (i.e. mental health need, a parent in prison, persistent absences from education, or a risk of FGM) are present but there is no evidence of abuse or a particular risk, the DSL and Head of Service at Seashell

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will advise staff on preventative work that can be done either within the organisation or together with partners. This is often referred to as Early Help in children's services.

The DSL may decide to notify the children's Multi-Agency Safeguarding and Support Hub (MASSH) or the Learning Disability Adult Team so that a strategic overview can be maintained, and any themes or common factors can be identified. The organisation will set timelines, monitor and review the situation, and take appropriate steps or seek advice as required.

The DSL may also seek advice about undertaking an early help assessment and/or making a referral to social services or involving the Local Safeguarding Children's Partnership or Local Safeguarding Adult's Partnership. If, during or after assessment, the concerns about the people who use our services turn out to be more significant and meet the additional needs/complex need criteria, the DSL will refer the matter to either the MASSH for children or Adult Social Care in Stockport.

It may be appropriate to speak with the people who use our service's family. The DSL will take this decision and may well be the person who talks to the family.

Online Safety

At Seashell, we recognise that online threats to our service users are evolving and can be a contributing factor to various types of abuse. To stay ahead of these dynamic threats, we ensure that our staff remain informed and trained, with online safety forming an integral part of our safeguarding training. Online safety is embedded throughout our provision, ensuring our service users are well-informed about all aspects of safeguarding, including online safety.

In addition regular information is shared about how to maintain a safe online presence (including students, staff, and volunteers). Engagement with parents and others using events such as parent's evenings and newsletters, as well as social media channels.

Our approach to online safety is informed by the four key categories of risk as identified in [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](#):

- **Content:** Managing exposure to illegal, inappropriate, or harmful content such as pornography, fake news, racism, self-harm, suicide, radicalisation, and extremism.
- **Contact:** Preventing harmful online interaction with other users including peer pressure, commercial advertising, or grooming.
- **Conduct:** Addressing personal online behaviour that increases the likelihood of harm, such as sharing explicit images and online bullying.
- **Commerce:** Safeguarding against risks such as online gambling, inappropriate advertising, phishing, and financial scams.

Censornet: We utilise Censornet's web filtering and Cloud Application Control capabilities to manage and monitor internet access, control what can be accessed online, and prevent exposure to inappropriate or harmful content. Censornet's filtering lists are powered by intelligence from multiple sources including proprietary research, data from global web crawlers, and AI-based dynamic real-time categorisation.

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Mimecast: To secure our email communications, we use Mimecast. This system helps detect and block spam, phishing, and malware threats, preventing them from infiltrating our network.

Cisco's Next-Generation Firewall (NGFW): Cisco's NGFW, with web filtering, threat defence, and advanced malware protection, protects our network from advanced threats. Its filtering capabilities are supported by the Cisco Talos Intelligence Group, one of the world's largest commercial threat intelligence teams.

Filtering and monitoring:

In line with [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk), Seashell is taking robust steps to enhance its filtering and monitoring standards. A critical aspect of our approach includes routinely analysing data derived from our cybersecurity tools, including Censornet, Mimecast, and Cisco's Next-Generation Firewall. This data provides us with key insights into online behaviour, potential threats, and the effectiveness of our protective measures.

This analysis helps us continuously fine-tune our approach to online safety. For instance, the data can reveal patterns of attempted access to inappropriate content, frequency and type of phishing attacks, and new, emerging forms of cyber threats. By monitoring these trends, we can adjust our filtering and blocking parameters as necessary and take proactive steps to address any potential threats before they become issues. This analysis informs our safer practices by highlighting areas where additional education or training may be beneficial. By providing targeted training based on real data, we can help our service users and staff better understand the evolving nature of online risks and the best ways to protect themselves.

This proactive, data-driven approach ensures that our online safety measures align with the KCSIE 2023 guidelines, providing a safer, more secure online environment for our service users and staff.

To report any potential online risks or threats, our service users and staff can directly report to our IT department.

Cybercrime:

We acknowledge the risk of individuals being drawn into cybercrime activities, such as unauthorised access (hacking), denial of service attacks, and malicious software.

Concerns regarding these should be reported to the Designated Safeguarding Lead (DSL), who can refer individuals to the appropriate agencies such as [Cyber Choices: Helping you choose the right and legal path - National Crime Agency](#).

Positive behaviour support

The development of behaviour support plans to safeguard people who use our services serves to mitigate and manage challenging behaviour and to keep people safe. The following is in situ to support and safeguard:

- Regulated health and care professionals adhere to [The Health and Care Professions Council \(HCPC\) | \(hcpc-uk.org\)](https://www.hcpc.org)
- Standards for nurses - The Nursing and Midwifery Council ([nmc.org.uk](https://www.nmc.org.uk))

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- Regulated Social Workers adhere to the [Social Work England](#) professional standards
- Compliance with the restraint reduction network training standards by utilising BILD accredited restrictive intervention training
- Compliance with the Mental Capacity Act 2005
- Compliance to the National Institute for Health and Care Excellence [Violence and aggression: short-term management in mental health, health and community settings 2015 \(nice.org.uk\)](#)

At an operational level:

- **Behaviour Support plans** will detail the collaborative and agreed behaviour support strategies for a people who use our services engaged in education and residential care services at Seashell. These are managed and quality assured by the Behaviour Support Team and Behaviour champions across the relevant departments.
- [Deprivation of Liberty orders - GOV.UK \(www.gov.uk\)](#) (Mental Capacity Act 2005) are in situ for some residential adults at the Seashell and managed through the Registered Managers in Residential Care Services. Each case is specific to meet individual need and not all adults in the residential short break service will require a DOLs.
- **Individual Support plans (ISP)** for all people who use our services engaged in education and residential care services. This person-centred plan details bespoke strategies to ensure the people who use our services feel safe and their care and support needs are met. These are quality assured and managed by either Education (called 'ISP day student', if the people who use our services does not reside on site) or the Registered Managers across Residential Care Services for our residential cohort in adults and children's care homes.
- **Health Action Plan** for all people who use our services engaged in education and residential care services. This action plan details all the medical needs, medication, PRN and outlines the requirements and considerations for the lawful use of covert medication. These are quality assured and managed by the Nurse Teams in Health Services, supported by House Managers in Residential care teams.
- Specific departments employ and facilitate different checks, audits and inspections that includes, but is not limited to internal multi-disciplinary meetings, Annual reviews, Regulatory inspections (Children's Regulation 44), Quality Team Audits, harm level analysis, thematic reviews.

Restraint, seclusion and segregation

Seashell recognise that the improper treatment of people who use services includes discrimination or unlawful restraint, which includes inappropriate deprivation of liberty under the terms of the Mental Capacity Act 2005.

- Regulated Adult services comply with Regulation 13, [The Health and Social Care Act 2008 \(Regulated Activities\) Regulations 2014 \(legislation.gov.uk\)](#). Refer to the appropriate Statement of Purpose.
- Regulated children's services comply with Regulation 16, 19 and 20, [The Children's Homes \(England\) Regulations 2015 \(legislation.gov.uk\)](#). Refer to appropriate Statement of Purpose.

The same definitions detailed within the Restraint Reduction Network: Restrictive Practices Review Tool [RP-tool-RRN-with-all-included.10.18.TT .pdf \(bild.org.uk\)](#) have been used for restraint and seclusion. Seclusion has

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been considered in respect of the current (albeit impending changes) Deprivation of Liberty Safeguards (DOLs) detailed in the Mental Capacity Act 2005.

Physical restraint	<p>Physical Restraint covers a wide range of actions. It includes the use of active or passive means to ensure that the person concerned does something or does not do something they want to do.</p> <p>The unlawful or inappropriate use of physical restraint may constitute a criminal offence.</p>
Chemical restraint	<p>The use of medication which is prescribed and administered for the purpose of controlling or subduing behaviour, where it is not prescribed for the treatment of a formally identified physical or mental illness.</p> <p>Seashell is committed to the STOMP Stamp campaign NHS England » Stopping over medication of people with a learning disability, autism or both (STOMP)</p> <p>Refer to the Administration of Medication Policy.</p> <p>The unlawful or inappropriate use of chemical restraint may constitute a criminal offence.</p>
Environmental restraint	<p>The use of obstacles, barriers, or locks to prevent a person from moving around freely.</p> <p>The unlawful or inappropriate use of environmental restraint may constitute a criminal offence.</p>
Psychological restraint	<p>Depriving a person of choices, controlling them through not permitting them to do something, making them do something or setting limits on what they can do, without physically intervening. This includes the use of threats and coercion.</p> <p>The unlawful or inappropriate use psychological restraint may constitute a criminal offence.</p>
Mechanical restraint	<p>The use of a device to prevent, restrict or subdue movement of a person's body, or part of the body, for the primary purpose of behavioural control.</p> <p>The unlawful or inappropriate use mechanical restraint may constitute a criminal offence.</p>
Seclusion	<p>The confinement and isolation of a person, away from others, in an area from which the person is prevented from leaving.</p> <p>Without an authorised Deprivation of Liberty Safeguards (DOLs) in place for this restriction is a breach of human rights.</p> <p>The unlawful or inappropriate use of seclusion may constitute a criminal offence.</p>
Segregation	<p>The Care Quality Commission advise that the key test of whether a patient is segregated is <i>whether they can leave the situation when they want to or are they prevented by staff from leaving</i> see Long Term Segregation v4.docx (cqc.org.uk) for more details. Consideration of the Deprivation of Liberty Safeguards (DOLs) is also required when determining whether an individual is segregated lawfully and with a clear rationale to preserve safety.</p> <p>The unlawful or inappropriate use of segregation may constitute a criminal offence.</p>

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Safeguarding in Seashell Active: outreach, sports and leisure activities

Promoting social inclusion for the people who use our services is fundamentally important and encompasses an array of sports and leisure activities on and off site.

Off-site: Safeguarding responsibilities extend to reporting harm experienced anywhere, including within our activities, within other organised community or voluntary activities, in the community, in the person's own home and in any other setting where Seashell staff are supporting people who use our services. Staff must follow this Safeguarding Policy when any issues arise off-site.

People who use our services and engage in education or residential care services may be supported to use on-site facilities safely after a risk assessment has been completed and reviewed by core staff.

On-site: Seashell Active co-ordinate and deliver a range of sports and leisure activities on-site and in addition to this organisational policy, the Seashell Active team also adhere to the following regulatory standards relevant to specific activities:

Area/ role	Guidance and regulatory standards
Working inclusively with disabled people in sport and leisure	cimspa-ps-working-inclusively-working-with-disabled-people-v1.0.pdf
Swimming	Health and safety in swimming pools - HSG179 (hse.gov.uk) Swimming with Health Conditions and Safeguarding for Swim Schools, Swim England (swimming.org) RLSS Safeguarding Guidance: cimspa-ps-swimming-teacher-v1.0.pdf Health and safety in swimming pools - HSG179 (hse.gov.uk) Halliwick AST Policies & Procedures – Halliwick AST Parental and Operator guidance for child supervision policies in swimming pools (nationalwatersafety.org.uk GN014)
Child Able and Disabled Sports (CADs)	cimspa-ps-working-with-children-ps-v1.0.pdf
Fitness instructor standards	cimspa-ps-gym-instructor-v1.1-.pdf
Personal trainer standards	cimspa-ps-personal-trainer-v1.1.pdf
British Gymnastics	Safeguarding and Compliance Policies - British Gymnastics (british-gymnastics.org)
Football – FA safeguarding strategy	the-fa-safeguarding-strategy-2021-22-to-2023-24---lr.pdf
Football safeguarding children policy	1-1-affiliated-footballs-safeguarding-policy-procedures-black-and-white-version.pdf
Code of Conduct for Sports and Leisure Professionals	cimspa-member code of conduct final aug22.pdf

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Active comply with the [Keeping children safe: code of practice \(publishing.service.gov.uk\)](https://publishing.service.gov.uk). Therefore any incident involving a commissioned or temporary coach, trainer or instructor that is working directly with the people who use Seashell services will be expected to comply with Seashell safeguarding standards.

Active seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the Seashell on these matters where appropriate. This applies regardless of whether or not the children or adults at risk who attend any of these services or activities attend other Seashell services.

We ensure this by following a 'coaches and external provider process' that involves:

1. Meeting with potential new coaches or deliverers to make sure they are right for Seashell Active or CADS and to explain the nature of events and make sure that their offer is inclusive. Checking safeguarding policy and procedures.
2. Coaches or external deliverers complete an Active coaches information form.
3. Coaches/deliverers complete a HR DBS consent form which gives us permission to check their DBS online update.
4. Coaches then complete a Seashell new supplier form in order to be set up on the payment system – this is then signed by the Head of Active and checked by Seashell's data and governance lead and accounts department.
5. Relevant certificates and public liability insurance and risk assessments are received and added to provider's file.
6. On the first day of delivery, coaches or providers bring paper copies of their DBS along with a photo ID. This is checked by a safer recruitment member of staff from Seashell Active.
7. Coaches are added to the Active Coaches information database and the Active administrator keeps this information up to date and check are made every 12 month.
8. Coaches and deliverers never loan work and are always or assisted by a Seashell member of staff.

Any safeguarding concern or allegation raised about a commissioned or temporary coach, trainer or instructor will be dealt with as per the detailed guidance listed in this policy.

Additional reporting mechanisms / whistleblowing in sports:

Swimline is the Swim England and NSPCC Child Protection Helpline and is available for anyone involved in swimming sports, including children and young people, who believe that the welfare of a child is at risk. This could be due to neglect or abuse, bullying or fear of someone, or anything that is worrying you and you don't know who to discuss this with.

- Swimline on 0808 100 4001. ([Swim England Child Safeguarding Contacts \(swimming.org\)](https://www.swimming.org))
- NSPCC Child Protection Helpline direct on 0808 800 5000.

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The helpline is open for 24 hours each day and calls are free of charge.

- [Safeguarding | The Football Association \(thefa.com\) Reporting Concerns](#)
- If urgent and you cannot contact the on-call DSL / DDSL then, you can contact the **NSPCC Helpline** for expert advice and support on **0808 800 5000** or help@nspcc.org.uk;

Further information regarding whistleblowing and reporting concerns to the relevant national governing bodies can be found here:

[NSPCC Child Protection in Sport Unit | CPSU \(thecpsu.org.uk\)](#)

[Reporting or responding to a concern | Children and Adults Sport England](#)

[Safeguarding | Sport England](#)

[Mencap Sport - Learning Disability Sport Inclusion | Mencap](#)

Suitability of staff, safer recruitment practices and whistleblowing

Seashell recognise that safe recruitment practices are an essential part of creating a safe environment and follow part three, [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](#). Consequently, we will ensure that staff (including bank colleagues, governors/trustees and agency workers) and volunteers working within our services are suitable to do so and therefore do not pose any kind of risk to our service users.

Appropriate members of the Senior Leadership Team (SLT), governors, and other relevant staff are required to complete Safer Recruitment Training to ensure that one panel member on every selection panel is trained.

Please refer to the [Safer Recruitment Policies and Procedures 2023 \(need hyperlink\)](#).

Complaints and whistleblowing

Where a staff member feels unable to raise an issue with the DSL, DDSL or Head of Service, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them [Doing the right thing Policy \(Public Interest Disclosure 'Whistleblowing'\)](#)

General guidance on whistleblowing can be found on the [Whistleblowing for employees: What is a whistleblower - GOV.UK \(www.gov.uk\)](#)

Children's services: The NSPCC's "What You Can Do to Report Abuse" dedicated helpline is available as an alternative route for staff in school who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school.

Staff can call 0800 028 0285, **which is available from 8:00am to 8:00pm, Monday to Friday, and email help@nspcc.org.uk.**

Adult services: Regulated services, such as the adults residential care home or the TDDI health care service at Seashell can be reported to the Care Quality Commission. If you do not feel like you can talk to someone in Seashell, read this quick guide to whistleblowing or guidance for workers which gives helpful advice on speaking out about poor

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care and what protection you will have from the law: Report a concern if you are a member of staff - Care Quality Commission (cqc.org.uk)
Safeguarding Training
<p>Induction: All newly appointed staff (including governors, and volunteers where appropriate) will be given appropriate safeguarding training as part of their induction programme. Newly appointed staff will complete the relevant online training modules for safeguarding, child protection and adult safeguarding training as part of their two-week induction. Newly recruited staff also attend a mandatory hour and half 'Safe at Seashell' induction to ensure that all new staff:</p> <ul style="list-style-type: none"> • Understand the organisations safeguarding systems, • Their responsibilities, • Can identify signs of possible abuse or neglect or exploitation, • Know how to act upon any concerns they have. <p>Newly recruited staff will complete additional online safeguarding and training modules as required by their area of work that includes, but is not limited to Child Sexual Exploitation, Female Genital Mutilation, and Prevent, Online Safety and whistleblowing procedures.</p> <p>The Heads of Service take responsibility for the delivery of additional departmental specific safeguarding training for newly recruited staff (or Directors for newly appointed Heads of Service).</p> <p>The Chief Executive, Directors, Trustee's, and Board members also have to attend mandatory courses and additional training considered and dependent on the job role. This may include, but is not limited to training regarding the Children's Homes (England) Regulations 2015 (legislation.gov.uk) or the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 Regulations for service providers and managers - Care Quality Commission (cqc.org.uk), Safer Recruitment and allegation management.</p> <p>Mandatory training for schools and college staff includes Part one Keeping children safe in education 2023 (publishing.service.gov.uk)</p> <p>Wider training: Mandatory training is co-ordinated through the Learning and Development Team, but Heads of Service are responsible for compliance and ensuring employees comply with this training. Additional training and continual professional development opportunities are steered jointly through collaboration with the Heads of Service and the Learning and Development Team depending on job role and responsibilities.</p> <p>Appendix 8: Training matrix</p> <p>All training is in line with expectations and arrangements from our local safeguarding partners. Within education services, it is also designed to support teachers to fulfil expectations through the Teachers' Standards in respect to managing behaviour in the classroom and having a clear understanding of pupil needs.</p>

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The Seashell is embedding a positive culture of safeguarding and there is a focus on the frontline staff engaging in consistent, routine and frequent continual professional development through workshops, team meetings, case studies e-bulletins or using the knowledge base of local partners or staff members (e.g., the Senior Mental Health Lead or members of our multi-disciplinary team). There is a clear safeguarding communication strategy in situ that is supported by the Marketing and Communications team, Health and Wellbeing Board and the Family Team.

To achieve a positive culture of safeguarding:

- Time will be given to enable this commitment to be met.
- Updates will feature regularly in all staff and Senior Leadership Team meetings, as appropriate.
- All paid staff and members of the Governing Body and relevant Trustee's and Board members will undertake the training.
- The DSL /DDSLs, social worker and key safeguarding contacts will attend Local Authority and other training courses as necessary and other appropriate inter-agency training every year.
- The DSL, DDSL, social worker and key safeguarding contacts will attend Prevent training and this will be cascaded to all staff.
- Contractors will receive safeguarding training where required or when otherwise considered necessary.
- Agency staff will be required to have completed safeguarding training validated and confirmed by the Agency Lead in conjunction with the standards and expectations when working with children and adults at risk. This will be asserted in the Service Level Agreements in situ.

Roles and Responsibilities

Seashell recognises that safeguarding and promoting the welfare of all people who use service is everyone's responsibility.

Directors of the Charity:

The Board of Directors and the Seashell's Safeguarding Board has responsibility for and will undertake an annual review of this Policy and the Trust's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working.

The DSL will work with the Chair of Safeguarding Board and prepare a written report for the Board of Directors. The written report should address how the Seashell ensures that this Policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the Seashell and how these have been handled; and the contribution the Seashell is making to multi-agency working in individual cases or local discussions on safeguarding matters.

With specific reference to part 4, 'Learning Lessons'(420-421) in [Keeping children safe in education 2023](https://www.publishing.service.gov.uk) ([publishing.service.gov.uk](https://www.publishing.service.gov.uk)) the lessons learned from professional allegations will also be considered and discussed as required.

The Board of Directors and the Seashell's Safeguarding Board should also consider independent corroboration, such as inspection of records or feedback from external agencies including the Designated Officer(s). They will

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review the report, this Policy and the implementation of its procedures and consider the proposed amendments to the Policy before giving the revised Policy its final approval.

Seashell has adopted the guiding principles outlined in [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](#) and all education based staff who work directly with people who use our services in school and college must read Part One and Annex B.

The CEO:

- To ensure that the role and responsibilities of the board in relation to Safeguarding are met
- To ensure that Seashell adheres to relevant national guidance and standards for safeguarding children and adults at risk
- To promote a positive culture of safeguarding across the Trust to include:
 - ensuring there are procedures for safer staff recruitment; whistle blowing; appropriate policies for safeguarding and child protection (including regular updating); and that staff and stakeholders are aware that the organisation takes safeguarding seriously and will respond to concern about the welfare of any service user
- To appoint an Executive Director lead for safeguarding (DSL)
- To ensure good safeguarding practice throughout the organisation
- To ensure that operational services are resourced to support/respond to the demands of safeguarding effectively
- To ensure that an effective safeguarding training and supervision strategy is resourced and delivered
- To ensure and promote appropriate, safe, multiagency/interagency partnership working practices and information sharing practices operate within the organisation

Partners, Contractors and Service Providers

Seashell have a statutory responsibility to make sure that the organisations they partner and/or commission services from have effective safeguarding arrangements in place to safeguard children and adults at risk of abuse and neglect.

Any collaboration and partnership between Seashell and partners/providers will ensure all organisations commissioned or contracted to provide services will in the discharge of their functions, have regard to the requirements contained within Seashell's Safeguarding Policy, statutory guidance Working Together to Safeguard Children 2018, the Care Act 2014 as well as Policy and Guidance set out by Seashell and as required undertake a safeguarding induction

The following measures, where necessary will be reviewed to ensure that safeguarding and promoting the welfare of children and adults at risk of abuse or neglect are given priority and are discharged effectively across partner communities through commissioning arrangements:

- Systems to train staff to the appropriate level to recognise and report safeguarding issues;
- A clear line of accountability for safeguarding; reflected in governance arrangements;

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- Systems in place to ensure that providers of services are held to account through regular review of safeguarding arrangements through quality scrutiny processes;
- Arrangements to share information between partners, service providers, agencies and commissioners;

Designated Safeguarding Lead:

- Leading child protection, adult protection and safeguarding across the organisation.
- Having the appropriate status and authority to carry out their role – deputies must be trained to the same standard as the DSL.
- Having the time, support, training, funding, and resources to be able deliver all their functions as a DSL.
- Delegating certain functions (except lead responsibility) to the deputies, and deputies can be contacted when the DSL is away or absent from site.

In relation to policies and procedures, the DSL must ensure that:

- The Safeguarding Policy and procedures are reviewed annually and always remains up to date – working with the senior leadership team including Registered Managers and Heads of Services, governors and the Safeguarding Board to achieve this.
- Staff have access to and understand the Safeguarding Policy and it is available publicly to parents/ carers, who should also be made aware of the Seashells role in the child protection and adult at risk process.
- Staff are aware of local safeguarding arrangements.
- The DSL/ DDSL should also receive appropriate training (including Prevent) to undertake all their role and responsibilities, and this includes:
 - Understanding about specific needs that can increase vulnerability as well as specific harms that put people who use our services at risk.
 - Understanding the assessment process for referrals to the Local Authority, including those relating to early help, adult and child protection.
 - Attending conferences so that they can be an effective participant in the process(es) and understand the importance of information sharing with other agencies.
 - Understanding how important their role is for providing information to children and adult social care so that people who use our services can be safeguarded, and their welfare promoted.
 - Understanding the effect adverse childhood experiences and trauma can have on children and adults, including the impact on behaviour, mental health, educational outcomes, independence, and capacity decisions.
 - Understanding and being alert to the specific vulnerable groups such as children in need, adults at risk with SEND, or with other health conditions.
 - Supporting the school / college with fulfilling its Prevent duty and stay up to date with the latest guidance in relation to Prevent.
 - Being aware of local protocols and how to use them – for example, when contacting the police about a serious violent sexual offence such as rape.
 - Being aware of the contact details for the local housing authority so that any issues of homelessness can be referred correctly and swiftly.
 - Understanding the risk to people who use our services with SEND, posed by online activity.
 - Understanding the barriers that stop people who use services from reporting issues and how to build trust to help with this.

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- Building a culture of safeguarding, listening and making sure the wishes and feelings of the people who use our services are considered, and encouraging staff in the measures across the Seashell to promote this.
- Having the ability to keep accurate, detailed, secure written records of safeguarding and welfare issues.

Designated Safeguarding Lead (DSL), Deputy Designated Safeguard Leads (DDSLs), Heads of Service and key contacts for safeguarding across all services:

- Be responsible for the implementation of this and all related policies and procedures, ensuring that the outcomes are monitored. This will be steered by the Seashell Strategic Safeguarding plan that is reflected in the annual departmental safeguarding plans.
- Meet regularly or share relevant and appropriate details of safeguarding issues within their department with the DSL and report to either/ or the Governing Body, Safeguarding Board or relevant Director of Services regarding the effectiveness of safeguarding and implementation of related policies.
- Ensure that everyone connected to the Seashell is aware of this policy including safeguarding, adult protection and child protection procedures and online safety.
- Ensure that everyone connected with the Seashell understands and follows this and connected policies.
- Ensures that everyone has appropriate training, including online training – at induction and regularly thereafter.
- The Royal School Manchester and the Royal College Manchester must appoint a designated teacher to promote the educational achievement and welfare of students who are looked after and ensure that this person has appropriate training.
- Ensure safe recruitment practice is followed when recruiting for posts, and act as a case manager when an allegation is made against a member of staff or volunteer. This includes being the recipient of any low-level concerns (i.e., those that do not meet the threshold).
- Ensure the Seashell has a robust system for gathering all appropriate checks in relation to all staff, volunteers, and visitors, including Section 128 checks for school governors (legislation.gov.uk).
- Ensure the Seashell offers a safe environment with a robust health and safety policy to meet the statutory responsibilities for the safety of people who use our services.

(Education services) Through the delegation of their powers the Governing Bodies of the school and college are responsible for the following:

The Governing Body will, as part of their responsibilities, and in respect of the Terms of Reference for the Governor meetings read [Keeping children safe in education 2023](http://publishing.service.gov.uk) (publishing.service.gov.uk). Governors will also:

- Have strategic leadership responsibility for safeguarding in the Royal School and Royal College Manchester and receive updates in Governor meetings from the relevant Head of College, Head of School.
 - *It should be noted that Governors receive feedback from the relevant Registered Manager in Residential Care in these meetings but have no jurisdiction over residential care services. Governor's act as a critical friend to registered managers, they seek assurance that the lived*

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experience of the child/adult across services is positive and in line with policies, they oversee the extended curriculum for residential learners and the impact it has on their overall progress.

- Will ensure that the school and college is compliant with all duties under legislation and statutory guidance such as KCSIE 2023. This includes making sure that policies, procedures and training are effective.
- Ensure that a DSL/ DDSL has the status and authority to carry out all the DSL duties. The Governing Body will also ensure the DSL and DDSLs have the time and resources to access training, and - carry out the role.
- Together with senior teams, especially the DSL, the governing body will ensure that all education-based staff read **Part 1 of KCSIE 2023**, except those who do not work directly with people who use our services who, if considered appropriate, can read the condensed version.
- Together with senior teams and the DSL, the governing body will ensure all education staff are appropriately trained in child protection and adult safeguarding issues (including online safety) both at induction and on an ongoing basis.
- Ensure that there is a whole-site approach to safeguarding, i.e. safeguarding, adult protection and child protection should be at the front of thinking and should underpin relevant policies and procedures. Policies and procedures should all operate with the best interests of the individual. They will further ensure that teaching safeguarding to people who use services (including online safety) is integrated into the curriculum and residential care pathway.
- Ensure that the Seashell creates a culture that safeguards and promotes the welfare of all people who use our services. This includes ensuring unsuitable people are not employed by the school and ensuring compliant safer recruitment practices are in place, e.g., making sure that those involved in recruitment are trained in safer recruitment.
- Ensure policies, procedures, and mechanisms are in place to fulfil safeguarding responsibilities to those people who use services who are "looked after". Residential care services must comply with the standards outlined in the [Health and Social Care Act 2008 \(legislation.gov.uk\)](http://legislation.gov.uk) and [The Children's Homes \(England\) Regulations 2015 \(legislation.gov.uk\)](http://legislation.gov.uk)
- Ensure the Seashell has effective policies on a range of safeguarding related areas (in line with all good practice and KCSIE 2023 - in particular, paragraph 85 that is also compliant with the legislative requirements and best practice standards outlined for adult and children's residential care services) that include:
 - a. Child protection and safeguarding (including paragraph 145 in respect of information about child-on-child abuse).
 - b. Adult at risk safeguards including adult at risk-on-adult at risk abuse
 - c. Behaviour.
 - d. Staff conduct.
 - e. Appropriate safeguarding arrangements for those who go missing from education
 - f. Appropriate safeguarding arrangements for children who go missing from home
 - g. Low level concerns/handling allegations against staff where the threshold is not met for a statutory referral.
- Ensure that the Seashell has systems for dealing with safeguarding issues which are well promoted, easy to understand and easily accessible for people who use our services to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Ensure that these policies and procedures reflect the challenges SEND children can face in terms of safeguarding, e.g., communication barriers and increased risk of bullying - and allow for identification of any mental health issues that people who use our services may be experiencing.

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- Ensure, when fulfilling the responsibility to teach people who use our services with complex needs and disabilities about safeguarding including online safety and that this learning is, where necessary, tailored and contextualised.
- Ensure they are aware of and understand local arrangements for safeguarding and the Seashell participates and contributes to multi-agency working.
- Ensure that training for teaching staff reflects the [Teachers' Standards guidance publishing.service.gov.uk](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101222/teachers-standards-guidance.pdf)
- Expectations around managing behaviour effectively.
- Ensure that the Seashell has appropriate filters in place to keep people who use our services safe online whilst ensuring that filters are not unreasonable.
- Ensure that within the Royal School Manchester and the Royal College Manchester, the child protection files are maintained, stored and retained properly (Annex C of [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101222/keeping-children-safe-in-education-2023.pdf) has a detailed list of this requirement
- Ensure that all staff recognise the importance of sharing information to keep people who use our services safe.
- Ensure the Seashell has appropriate safer recruitment policies and procedures in place (see Part 3 of [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101222/keeping-children-safe-in-education-2023.pdf)), including - in maintained schools - ensuring that governors are appropriately DBS checked.
- Ensure that the Seashell has more than one contact number for people who use our services (e.g a child missing who is also a safeguarding concern has more than one responsible adult the school can contact).
- Ensure that any hire agreement or similar contract for use of the Seashell premises includes safeguarding requirements – any breach should lead to termination.
- Assess the impact of this policy in keeping people who use our services safe.
- Appoint a nominated governor to liaise with the Head of Service in Education and Residential Care and the Designated Safeguarding Lead (DSL) on safeguarding issues who will also sit on the Safeguarding Board meetings three times per year.
- Review and annually approve the safeguarding policy, ensuring it complies with all law, regulations, and good practice. They will also hold the DSL to account for its implementation.
- Receive any allegations made against any DSL, DDSL or Head of Service and work with the Board of Trustees as required.
- Ensure compliance with Charity Commission requirements around child protection and safeguarding.

Child protection files - Head of School and College (as DDSL's and where there are children under 18 years of age) must:

- Keep clear, accurate, up-to-date records of any concerns, actions taken, and how these were followed up.
- Records must be held securely and only shared with those who need to know – in line with data legislation and regulations.
- Hold files separately from the main file. Transferring them to a new school as soon as possible and no longer than 5 days after the transfer, or 5 days after the start of a new term if the transfer is not in term time. The Head of School and College must obtain a receipt for the file.
- Consider whether or not it is appropriate to inform a new school that a child is involved in a Channel programme.
- Have details of the local authority Personal Advisor appointed to guide and support a care leaver and liaise with them as necessary regarding any issues of concern affecting the care leaver. - Where a perpetrator transfers schools, make the new school aware of potential risks, protective factors, and any ongoing support the child is receiving.

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All staff are responsible for ensuring that:

- Provide a safe environment in which people who use our services can learn
- Be able and prepared to identify any people who use our services in need of early help.
- Be able to reassure victims that they are being taken seriously and will be supported and kept safe. Staff should never give the impression that reporting abuse causes problems, and victims should not feel ashamed.
- Be aware of the role of the DSL, DDSL including how and when to contact them.
- Follow the reporting structures for safeguarding concerns.
- Be able and prepared to deal with any safeguarding concern including knowing who to speak to and understand how to deal with sharing information and confidentiality issues.
- Be aware of, and act on, the contents of
 - (a) this Safeguarding Policy which covers all child-on-child and adult at risk-on-adult at risk abuse.
 - (b) the Behaviour Policy (which includes measures to prevent bullying, including cyberbullying, prejudice, and discriminatory bullying);
 - (c) the Online Safety Policy.

In addition,

- Staff must be aware of and understand their Code of Conduct and the Employee Handbook
- Receive appropriate training about safeguarding and child protection and adult protection (including online safety), which is co-ordinated by the Learning and Development Team, through formal and informal learning within departmental team meetings, workshops and re-enforced through internal communications on intranet and social media platforms (refer to part 8).
- Understand the child protection process, including Section 17 and Section 47 of the [Children Act 1989](http://legislation.gov.uk) (legislation.gov.uk) and adult at risk procedures, including Section 42 [Care Act 2014](http://legislation.gov.uk) (legislation.gov.uk), multi-agency meetings, and be aware of local arrangements for the early help process and advocating in the best interests of the people who use our services (sometimes referred to as the common assessment framework for children), understanding their role in each.
- Be aware of what to do if a people who use our services discloses abuse, neglect, or exploitation.
- Be able to recognise physical abuse, emotional abuse, sexual abuse, and neglect, as well as safeguarding issues surrounding child sexual exploitation (CSE), child criminal exploitation (CCE) including county lines, child-on-child, adult at risk-on-adult at risk abuse, serious violence, Prevent-related issues, and female genital mutilation (FGM) - AND understand that often safeguarding issues overlap and is equally relevant and important for adults at risk given their complex needs and disabilities and could also include financial abuse, hate crimes and discrimination;
- Be aware that safeguarding concerns can be linked to or caused by factors in a people who use our services wider environment outside of the family, such as sexual and criminal exploitation, and serious youth violence. This is often referred to as contextual safeguarding.
- Be aware that mental health issues can be a significant indicator of abuse or neglect.
- Be able to report concerns about safeguarding arrangements within the Seashell and know not to hesitate before doing so.
- Know what to do if a child or adult is missing from education or residential care.

Legislation and Guidance:

This policy is derived from a variety of legislative provisions and statutory guidance. It is based on good practice found in the following hyperlinks:

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[Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
[Working together to safeguard children - GOV.UK \(www.gov.uk\) 2018](https://www.gov.uk)
[The Children's Homes \(England\) Regulations 2015 \(legislation.gov.uk\)](https://legislation.gov.uk)
[The Care Homes Regulations 2001 \(legislation.gov.uk\)](https://legislation.gov.uk)
[The Health and Social Care Act 2008 \(Regulated Activities\) Regulations 2014 \(legislation.gov.uk\)](https://legislation.gov.uk)
[Care Act 2014 \(legislation.gov.uk\)](https://legislation.gov.uk)
[Mental Capacity Act 2005 \(legislation.gov.uk\)](https://legislation.gov.uk)
[Education and Inspections Act 2006 \(legislation.gov.uk\)](https://legislation.gov.uk)
[Children and Families Act 2014 \(legislation.gov.uk\)](https://legislation.gov.uk)
[SEND code of practice: 0 to 25 years - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
[Human Rights Act 1998 \(legislation.gov.uk\)](https://legislation.gov.uk)
[Equality Act 2010 \(legislation.gov.uk\)](https://legislation.gov.uk)
[Counter-Terrorism and Security Act 2015 \(legislation.gov.uk\)](https://legislation.gov.uk) and [Prevent duty guidance: Guidance for specified authorities in England and Wales \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
[Safeguarding-children-young-people-and-adults-at-risk-in-the-NHS-Safeguarding-accountability-and-assuran.pdf \(england.nhs.uk\)](https://www.england.nhs.uk)
[Data Protection Act 2018 \(legislation.gov.uk\)](https://legislation.gov.uk)
[Guide to the UK General Data Protection Regulation \(UK GDPR\) | ICO](https://ico.org.uk)
[The Caldicott Principles - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Our safeguarding policy and procedures comply with the above guidance and is updated with local arrangements agreed and published by the three local safeguarding partners in Stockport. These include:

- **Safeguarding Adults at Risk. The Multi Agency Policy for Safeguarding Adults at Risk** [Safeguarding Adults at Risk \(safeguardingadultsinstockport.org.uk\)](https://safeguardingadultsinstockport.org.uk)
- **Safeguarding Children in Stockport Policies and Procedures** (including the Greater Manchester Safeguarding Children Procedures Manual) <http://greatermanchesterscb.proceduresonline.com/> and **Stockport Multi Agency Guidance on levels of Need** [Stockport-Multi-Agency-Guidance-on-Levels-of-Need.pdf \(safeguardingchildreninstockport.org.uk\)](https://safeguardingchildreninstockport.org.uk)

The following legislation is also incorporated into this policy:

- The Children Act 1989 (and 2004 amendment), which gives a broad framework for the care and protection of children and includes provisions for Local Authority inquiries, care proceedings, and emergency provisions.
- Female Genital Mutilation Act 2003 S 5B(11), as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on regulated professionals (i.e. health and care professionals, teachers, medical professionals) to report to the police where they discover/find that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Responsibilities for safeguarding and supporting girls affected by FGM are found in Statutory Guidance on FGM. [Multi-agency statutory guidance on female genital mutilation - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
 - o If a non-regulated professional becomes aware that FGM has been carried out on a girl under 18, they should still share this information within their local safeguarding lead, and follow their organisation's safeguarding procedures
- The Rehabilitation of Offenders Act 1974 which outlines provisions for when people with criminal convictions can work with children.

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- 'Regulated activity' in relation to children is found in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006.
- "PREVENT" duties under the Counter-Terrorism and Security Act 2015 [Counter-Terrorism and Security Act 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk) with respect to protecting people from the risk of radicalisation and extremism can be found in: Statutory Guidance on the Prevent Duty [Prevent duty guidance: Guidance for specified authorities in England and Wales \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk).

Other statutory provisions and guidance relevant to child protection and safeguarding in education include:

- The Education Act 2002 (Section 175).
- The School Staffing (England) Regulations 2009 Schedule 2, which covers information which must be entered into the Single Central Register, and Section 9, which stipulates that at least one person per interview panel must be trained in safer recruitment.
- The Education (Pupil Information) (England) Regulations 2005.
- The Sexual Offences Act, 2003, Home Office.
- Teaching Online Safety in Schools, 2019, DfE.
- Guidance on Sharing Information.
- Guidance on Adult at risk-on-adult at risk Sexual Abuse.
- Guidance on Nudes and Semi-Nudes.
- Teaching Standards.

The Seashell has also read and incorporated Ofsted's review of sexual abuse in schools and colleges published in June 2021 into this and connected policies and procedures.

Non-maintained special schools

Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015 imposes a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school. The Seashell's policy reflects these requirements.

Internal policies and procedures:

Safeguarding covers more than the contribution made to child protection and adult at risk procedures, in relation to individual people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

This document must therefore be read, used, and applied alongside the Seashell's policies and procedures referred to in 'related documents' listed below.

Health and safety

The Head of Service for Estates and Facilities will ensure that there is a robust, up-to-date Health and Safety Policy and Procedure to meet the statutory responsibility for the safety of all people who use our services and the staff. The Head of Service for Estates and Facilities will identify and manage health and safety through the use of risk assessments and through consultation with the Heads of Services, which are carried out:

- On an annual basis for the residential and educational spaces and environment in and outdoors.

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- When there are any changes to the premises or practices.
- Following a serious accident in relation to staff and/or students.
- When there is a high-level risk associated with contact with parents.
- To maintain effective security of the premises including protection from intruders, trespassers, and/or criminal damage.

The Seashell takes a risk-based approach to visitors and contractors on site. The normal procedure for visitors and contractors not working directly with children is that they will:

- Report to the Seashell reception on arrival.
- Provide proof of identity.
- Wear a name badge at all times.
- Receive suitable supervision by staff when on site.
- Be made aware of the arrangements for safeguarding and health and safety.
- Comply with the relevant vetting checks specified through the Seashell's recruitment process.

Fundraising statement:

Seashell is registered with the [Fundraising Regulator](#) and is committed to the [Code of Fundraising Practice](#) that sets out the responsibilities that apply to fundraising carried out by charitable and third sector fundraisers in the UK. The following four values support all standards in the code. Seashell operates fundraising practices and standards that protect vulnerable people and other members of the public.

Legal: All fundraising must meet the requirements of the law.

Open: Fundraisers must be open with the public about their processes and must be willing to explain (where appropriate) if they are asked for more information.

Honest: Fundraisers must act with integrity and must not mislead the public about the cause they are fundraising for or the way a donation will be used.

Respectful: Fundraisers must demonstrate respect whenever they have contact with any member of the public.

We recognise that every donor is an individual with a unique background, experiences and circumstances and every interaction between a fundraiser and donor is different. This applies to all staff, volunteers and anyone acting on behalf of Seashell. We will not take a donation if we know, or have good reason to believe, that a person lacks capacity to make a decision to donate, or is in vulnerable circumstances which mean they may not be able to make an informed decision. We consider these to be:

- any physical or mental-health condition the person may have
- any disability
- any learning difficulties
- whether the person is facing times of stress or anxiety
- whether a donation is likely to affect the person's ability to sufficiently care for themselves or leave them in financial hardship
- how well the person can communicate and understand what they are being told
- whether the person is under the influence of alcohol or drugs
- the person's age.

Seashell does not accept donations where it has reason to believe that the donor may be experiencing vulnerable circumstances and accepting the donation would be ethically wrong and/or harmful to the donor. If a donor does make a donation while they do not have the capacity to make an informed decision, we will return the money to them.

Safeguarding and communications statement

Seashell has made a commitment to deliver safeguarding messages, education and information to support staff in a professional and personal capacity. The aim is to strengthen safeguarding connections with frontline staff across site and grow the culture of safeguarding through a 'Safe at Seashell' approach.

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The Health and Wellbeing Board, Marketing and Communications and the Family team will support the delivery of safeguarding information to staff, people who use our services and wider community members through a range of mediums.

Given our departments work in conjunction with parents and carers there is ample opportunity to reinforce the importance of safeguarding and in particular online safety resources for the school and college in order to comply with [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) (s.139, p.36).

Lessons learnt from sector specific reviews and social policy:

Seashell proactively engage with wider reviews and recommendations to enhance practice across all services, including the recommendations made by Dame Christine Lenehan in the report 'These are our children: a review (2017)' that promotes [the Rights of the Child - UNICEF UK](https://www.unicef.org/uk) through a model of care that meets the needs of the child and family.

In addition, the Seashell are fully committed to the recommendations outlined in the [Independent Inquiry Into Child Sexual Abuse \(2022\)](https://www.independent.gov.uk) and will continue to prioritise the protection of all people who use our services by raising awareness of child sexual abuse and taking action if this is suspected. Seashell will empower the people who use our services by creating the right environment to disclose and seek support, continue to robustly regulate our workforce and refer to the Disclosure and Barring Service as required. Moreover, Seashell will embed a trauma sensitive approach that supports victims and survivors of child sexual abuse and exploitation that contributes to restorative and therapeutic recovery.

Other social policy or sector specific reviews will also inform and influence the delivery of best practice across the Seashell. Lessons will be learned from internal audits, incidents and investigations and the Seashell are currently proactively engaged in reviews that align with recommendations laid out in the following:

- [Safeguarding children with disabilities in residential settings - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- Care Quality Commission published the [Out of sight – who cares? \(cqc.org.uk\)](https://www.cqc.org.uk)
- Care Crisis Review: Options for change ([CCR-1.pdf \(frg.org.uk\)](https://www.nuffieldtrust.org.uk)) (Nuffield Foundation and Family Rights Group, 2018)
- Learning from Lives and Deaths – People with a learning disability and autistic people - [leder \(kcl.ac.uk\)](https://www.kcl.ac.uk) (2021)
- Stomp and Stamp (stopping the over-medication of children and young people with a learning disability, autism or both and supporting treatment and appropriate medication in paediatrics [STOMP STAMP A5 Leaflet \(england.nhs.uk\)](https://www.england.nhs.uk))
- [Summary of the SEND review: right support, right place, right time - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- Positive Behaviour Support - [bild](https://www.bild.org.uk)

Related Document(s)

Administration of Medication
 Low Level Concerns Policy
 Code of Conduct Policy
 Safer Recruitment Policy
 Health and Safety Policy
 PBS Policy
 Lockdown Policy
 Behaviours Framework

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Appendices

Appendix 1 DSL poster

Appendix 2 Other key contacts at Seashell

Appendix 3 Allegation Management flowchart procedures

Appendix 4 Safeguarding procedures inclusive of

Children – Immediate danger or risk of harm
Children – Cause for concern (no immediate risk of harm)
Adults – Immediate danger or risk of harm
Adults – Cause for concern (no immediate risk of harm)
Low level concerns procedure
Children and adults Low level concerns procedure
Safe at Seashell Body Map flowchart
Safe at Seashell Body Map flowchart for managers

Appendix 5: Allegation Management written table of procedures

Appendix 6 Specific categories of abuse and types of discriminatory abuse

Appendix 7 Training Matrix for safeguarding

Appendix 8 Document Version Control Log

Revision Schedule	Date	Key Amendments
Rev 0	July 2012	Written by J Taylor
Rev 1.0	Sept 2013	Reviewed and updated by AM Okotie
Rev 2	June 2014	Updated by K Corey
Rev 3.1	Sept 2015	Updated by N Giles Version for review by DSL
Rev 3.2	19 Oct 2015	Version for review by SST Safeguarding Board and ELT
Rev 3.3	Oct 2015	Clean version agreed and updated on SP
Rev 3.4	Sept 2016	Reviewed and agreed by SST Safeguarding Board, OMG and ELT
Rev 4	July 2017	Version for review by SST Safeguarding Board and ELT

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Rev 4.4	Jan 2018	Confirmed policy on website and Share Point
Rev 5	Sept 2018	Updated guidance KCSIE 2018, WTTSC 2018, Disq from Childcare Reg
Rev 6	June 2019	Updated list of DSL and Dep DSLs and contact details
Rev 7	July 2019	Updated reference to County Lines
Rev 8,9,10	Mar – Aug 2020	Revisions and addendum relating to COVID 19 period
Rev 11	Sept 20	Updated allegation management procedures, KCSIE 2020 amendments included, local LADO contact online added, Disbanded local PPIU's, added harm level guidelines, Updated staff details, Change terminology from 'vulnerable adult' to either 'adult' or 'adult at risk'
Rev 12	Dec 20	Additional section on Complex Safeguarding, Contextual Safeguarding, Mental Health and Wellbeing and Peer on Peer Abuse.
Rev 13	Sept 21	Annual review, contact details updated and section on COVID added
Rev 14	Sept 22	Annual review in line with KCSIE 2022 and key priorities set out at a local and national level
Rev 15	August 2023	Overhaul of the Safeguarding Policy. Annual review in line with KCSIE 2023 and key priorities set out at a local and national level.

Distribution Control

Issued to Operational Managers Group for distribution and reference within departments

Policy and procedure covered in all staff inductions

Detailed on SharePoint for all staff to access under Policies and Procedures

Detailed on the Seashell Trust website and available in hard copy on request. This policy can be made available in large print or another accessible format if required.

Name	Position	Organisation
Chris Smales	Chair of Board of Directors	Seashell (SST)
Brandon Lee	Chief Executive	Seashell (SST)

Title	Safeguarding Policy 2023
Issue Date	September 2023
Review Date	July 2024
Total Number of Pages	45
Author/Owner	Safeguarding Team (DSLs)
Approval Level	Board of Trustees / Safeguarding Board
Distribution	Trust Wide

Note: At this time (from the 25th September 2023) the hyperlinks may not be active within this document. Until the upgraded Sharepoint system has been installed access to hyperlinks may be inhibited and restricted. Please email sarah.ringwood@seashelltrust.org.uk for web addresses and support.

Ben Boddice	Director of Finance	Seashell (SST)
Nikola Giles	Director of People and Workplace (DSL)	Seashell (SST)
Bernie White	Director of Education (Dep DSL)	Seashell (SST)
Debbie Gittins	Registered Manager, Young Adults (Dep DSL)	Seashell (SST)
Ben Bainbridge	Registered Manager designate Children's (Dep DSL)	Seashell (SST)
Clare Sefton	Head of College (Dep DSL)	Seashell (SST)
Emma Houldcroft	Head of School (Dep DSL)	Seashell (SST)
Tamsin Rowbotham	Head of Clinical Service (Dep DSL)	Seashell (SST)
Jennie Ritchie	Registered Short Breaks Manager (Dep DSL)	Seashell (SST)
Sarah Ringwood	Senior Social Worker (Safeguarding)	Seashell (SST)
Carol Povey	Director (Chair of Safeguarding Board)	Seashell (SST)
Lynn Perry	Chair of Governor	Seashell (SST)
Nigel Finch	Safeguarding Governor RCM	Seashell (SST)
Ged Sweeny	Safeguarding Governor RSM	Seashell (SST)
Colin Wilde	Cyber Security	
Lindsey Smith	Data Protection	
Lindsey Smith, Tamsin Rowbotham	Caldicott Guardians	

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Appendix 9

Equality Impact Screening		
Stage 1: Initial Screening		
1. Briefly describe the aims and objectives:		
2. Who is intended to benefit from it and in what way?		
3. Are other departments involved, what will be their involvement and responsibilities?		
4. What outcomes are expected?		
Stage 2: Gathering data and analysis		
5. Have you consulted on this policy / procedure / guidance document in the last 12 months?		
Yes / No (delete as appropriate)		
Details of consultation:		
6. What evidence has been used for this assessment?		
Assessment of Potential Impact		
7. Could a particular group be differently affected in a negative way?		
Protected Characteristic	Negatively affected (Yes / No)	Evidence
Age		
Disability		
Gender Reassignment		
Marriage and Civil Partnership		
Pregnancy and Maternity		
Race		
Religion or Belief		
Sex		
Sexual Orientation		
8. If you have entered YES against any of the protected characteristics above please complete section 10. If not, please proceed to full impact assessment		
Are there any other policies / procedures / guidance documents / functions that need to be assessed alongside this screening?		
Yes / No (delete as appropriate)		
If yes, please identify which groups are affected:		
Should this policy / procedure / guidance document proceed to a full Equality Analysis?		

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Yes / No (delete as appropriate)	
If the answer is no please give reasons for this decision:	
Date by which the full Equality Analysis is to be completed	

Declaration

9. I / We are satisfied that an initial screening has been carried out on this policy / procedure / guidance and a full Equality Impact Assessment is / is not required.

Completed by		Date	
Role		Date for Review	

Please forward an electronic copy to the relevant Head of Department. The original signed hard copy should be kept with your team for audit purposes.

Contributions from / checks by:

Title	Safeguarding Policy 2023
Issue Date	September 2023
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Seashell

SAFEGUARDING POLICY (SEPT 23)

Appendix 1

Safe at Seashell

Embracing a Culture of Safeguarding at Seashell

At Seashell, safeguarding is everyone's responsibility.

It's simple really...we all deserve to be safe.

If you are having a hard time or notice something that doesn't seem right, speak to your head of service or one of the **Designated Safeguarding Leads** below:



Director of Education and Care
Bernie White - Ext 120



Senior Social Worker (Safeguarding)
Sarah Ringwood - Ext 118



Head Teacher (RSM)
Emma Houldcroft - Ext 172



Registered Manager,
Head of Children's Services
Ben Bainbridge - Ext 169



Principal (RCM)
Clare Sefton - Ext 150



Registered Manager,
Head of Young Adults Services
Debbie Gittins - Ext 746



Registered Manager,
Head of Health and Wellbeing
Tamsin Rowbotham - 07435 786317



Registered Manager, Head of
Children's Services Short Breaks
Jenny Ritchie - Ext 403



In an emergency or if there is an immediate risk of harm please call the duty Designated Safeguarding Manager on:

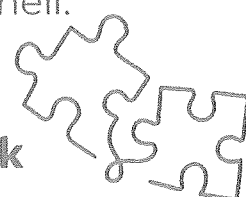
07742 904949



Nikola Giles, Director of People & Workplace is the Designated Safeguarding Lead at Seashell.

Contact:

Nikola.Giles@seashelltrust.org.uk



Seashell

Seashell

SAFEGUARDING POLICY (SEPT 23)

Appendix 2

Appendix two: Other key contacts

On-call Care co-ordinators (24/7)	Children 07879788945 Adults 07792 720623	
Young Adult residential Care Assistant Managers	Sian.Jones@seashelltrust.org.uk Rebecca.Barrell@seashelltrust.org.uk Michele.Holroyd@seashelltrust.org.uk Alison.Higton@seashelltrust.org.uk	
Children's Residential Care Assistant Managers	Adam.hayes@seashelltrust.org.uk Shannen.gonzales@seashelltrust.org.uk	
Royal School - Senior Teachers	Greg.Wood@seashelltrust.org.uk Rachel.Barnett@seashelltrust.org.uk Laura.Thompson@seashelltrust.org.uk Caroline.sweeting@seashelltrust.org.uk	
Royal College - Advanced Practitioners	Christine.Milner@seashelltrust.org.uk Katherine.Watson@seashelltrust.org.uk Debra.Lally@seashelltrust.org.uk Niall.Smalley@seashelltrust.org.uk	
Designated Looked After Children Lead (Education)	Royal College Manchester	Royal School Manchester Rachel.Barnett@seashelltrust.org.uk
Lead Nurse (s) (Education)	Royal College Manchester Jade.morgan@seashelltrust.org.uk	Royal School Manchester Tracey.Shadbolt@seashelltrust.org.uk
Senior Social Worker / Safeguarding Officer	Sarah.ringwood@seashelltrust.org.uk	
Principal Audiologist	Verity.langlands@seashelltrust.org.uk	
Lead Physiotherapist / Manual handling Lead	Harriet.Johnston@seashelltrust.org.uk	
Lead Speech & Language Therapist	Caroline.Gosling@seashelltrust.org.uk	
Lead Occupational Therapist	Lucy.griffiths@seashelltrust.org.uk	
Mental Health Nurse practitioner	Mario.saini@seashelltrust.org.uk	
Clinical Nurse Trainer	Abigail.Mandangu@seashelltrust.org.uk	
Head of Human Resources	Sian.Hustler@seashelltrust.org.uk	
Head of Active	Heather.Potter@seashelltrust.org.uk	
Head of Family Services	Sherann.HillmanMBE@seashelltrust.org.uk	
Head of Outreach	Michelle.Jones@seashelltrust.org.uk	
Head of IT	Colin.Wilde@seashelltrust.org.uk	
Senior Learning and Development Business Partner	Maria.McGrath@seashelltrust.org.uk	
Head of Marketing and Communications	Alison.french@seashelltrust.org.uk	
Head of fundraising	Dianne.gill@seashelltrust.org.uk	

Seashell

SAFEGUARDING POLICY (SEPT 23)

Appendix 3

Allegation/Investigation Management Process

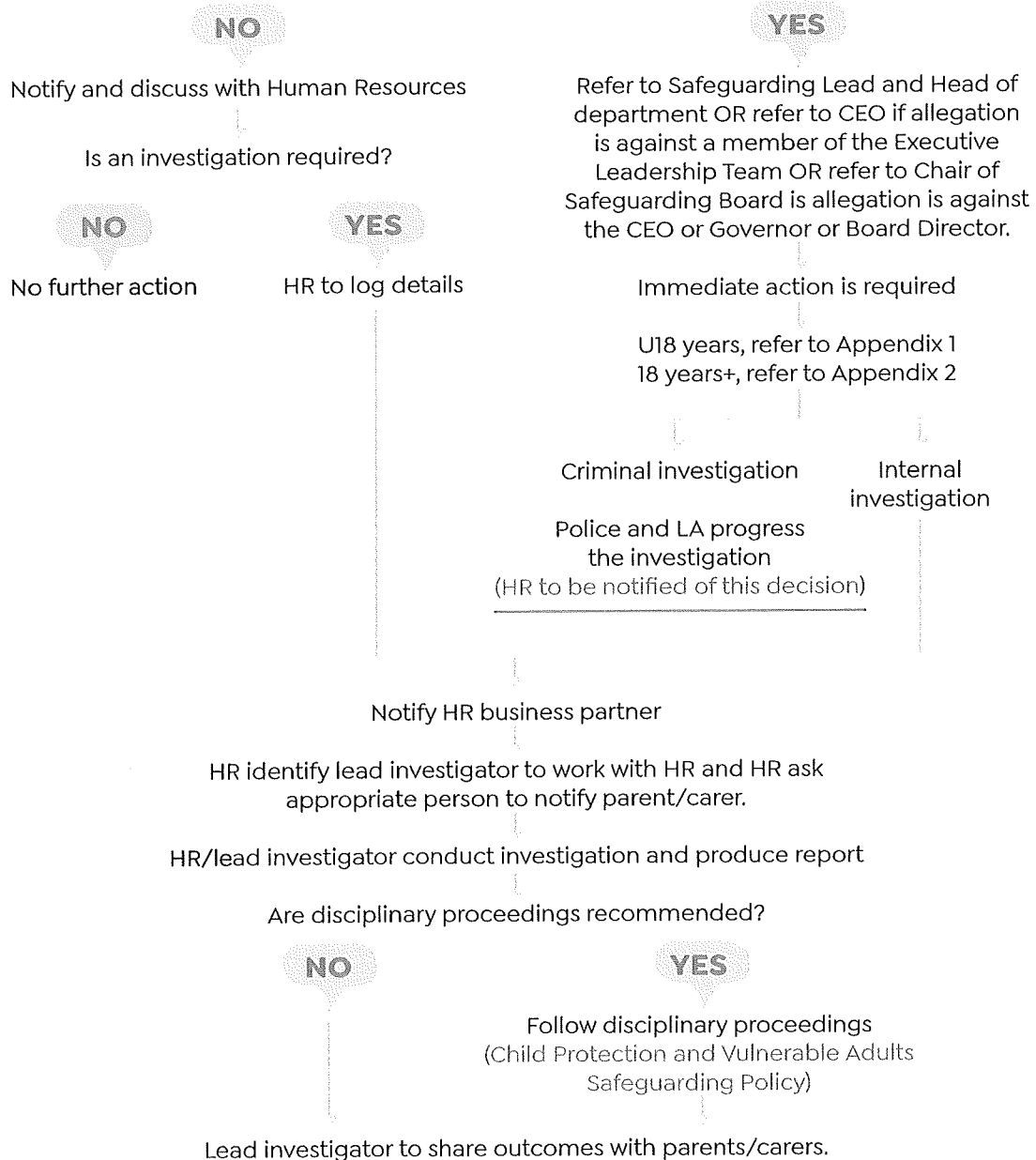
Safe at Seashell

Cause for concern about a member of staff/volunteer's conduct at work (allegation)

Report immediately to Team Leader or Manager, or call **07742904949**

Has a member of staff or volunteer...

- Behaved in a way that has harmed or may harm a child/young person?
- Possibly committed a criminal offence against a child/young person?
- Posed a risk to children/young people?



Seashell

SAFEGUARDING POLICY (SEPT 23)

Appendix 4

Safeguarding procedures

Children – Immediate danger or risk of harm

1. **If the child is at immediate risk of harm call the Police on 999**
2. Referrals can be made direct to Children's Social Care, but it is strongly recommended that frontline staff speak to the on-call DSL/ DDSL (telephone: 07742 904949) or safeguarding key contact to seek appropriate support and guidance. This must not delay the referral process.

The **Multi-Agency Safeguarding and Support Hub in Stockport (MASSH)** is the single point of contact for public and professionals to report concerns, request advice and share information about a child and or family. All professional referrals should be completed through the online form.

Contacting the MASSH - Stockport Council However if it's your professional judgement that the MASSH require this information immediately as the child has suffered significant harm or is at risk of immediate harm you should call:

- 0161 217 6028, select option 1.
- For out of hours emergencies call us on 0161 718 2118.

Next Steps:

- The MASSH will confirm the next actions that should be taken and who will lead on the case going forward
- On-call DSL/ DDSL, Head of Service must be informed and will co-ordinate a response internally
- Staff observing, reporting, and involved in the management and referral of this case must ensure detailed records are completed before the end of their shift.
- Support will be in place and co-ordinated through the on-call DSL/ DDSL or Head of Service as required.

Safeguarding procedures

Adults – Immediate danger or risk of harm

1. **If an adult is in immediate danger, you should call the police on 999. If the adult is not in danger now, call 101.**
2. Referrals can be made direct to Adult Social Care, but it is strongly recommended that frontline staff speak to the on-call DSL/ DDSL (telephone: 07742 904949) or safeguarding key contact to seek appropriate support and guidance.
3. This must not delay the referral process. You must consider adult capacity and the views of the family, but this should not deter you from taking action to safeguard.

If you're a professional and have a safeguarding concern for an adult complete the online form -

[Report suspected abuse or neglect - Stockport Council.](#)

If you know of a worrying situation or suspect someone over the age of 18 is being abused or neglected, do not ignore it. Report this to the on-call DSL/ DDSL or Head of Service and seek support to contact Adult Social Care on **0161 217 6029**, Monday to Thursday from 8:30am to 5pm and Friday from 8:30am to 4:30pm. For Minicom call **0161 217 6024**. For out of normal office hours, call **0161 718 2118**

Next Steps:

- Adult Social Care will confirm the next actions that should be taken and who will lead on the case going forward
- On-call DSL/ DDSL, Head of Service must be informed and will co-ordinate a response internally
- Staff observing, reporting, and involved in the management and referral of this case must ensure detailed records are completed before the end of their shift.
- Support will be in place and co-ordinated through the on-call DSL/ DDSL or Head of Service as required.

Children – Cause for concern (no immediate risk of harm)

Examples include recurring/continuing concerns in relation to practice, observations, behaviours that include internal and external issues, staff, visitors.

1. Report your concern to a line manager or Head of Service and ensure that your concern is detailed and factual.



Safe at Seashell

Safeguarding procedures

You may be required to write a statement, complete contact logs, or submit an online cause for concern to inform the wider DSL/ DDSL and safeguarding team. The link can be found here: [Cause for Concern - \(seashelltrust.org.uk\)](http://seashelltrust.org.uk). Depending on what the concern is related to will determine the next course of action and may include taking guidance from the following protocols:

- Designated Safeguarding Lead poster and contact information
- Allegation Management procedures
- Accident, Incident, Body Map procedure

2. Children's Social Care in Stockport advise that if the child is not at immediate risk of harm, then professionals should decide on the level of need. Levels of need are used to determine the kind of support a child or family requires. Descriptors can be found via this link [Stockport-Multi-Agency-Guidance-on-Levels-of-Need.pdf \(safeguardingchildreninstockport.org.uk\)](http://safeguardingchildreninstockport.org.uk)

Before you make a referral, you should have the consent of the family unless this will put the child at risk of harm. The on-call DSL/ DDSL will support with this decision.

Next Steps:

- On-call DSL/ DDSL, Head of Service will co-ordinate a response internally and advise on external information sharing, or multi-disciplinary referrals / consultations etc.
- Support will be in place and co-ordinated through the on-call DSL/ DDSL or Head of Service as required that may include, but is not limited to:
 - [Early Help Assessment - Stockport Council](http://seashelltrust.org.uk)
 - [Stockport SEND Local Offer | Stockport Information and Childcare Directory \(fsd.org.uk\)](http://fsd.org.uk)
 - Immediate solution focussed discussion to agree actions that can be implemented to resolve and/ or mitigate the concern
 - Multi-disciplinary and/ or inter-agency meetings and communications
 - Internal review of Individual Support Plans (including behaviour support plan), Health Plan, risk assessment or other relevant documentation.

Adults – Cause for concern (no immediate risk of harm)

Examples include recurring/continuing concerns in relation to practice, observations, behaviours that include internal and external issues, staff, visitors.

1. Report your concern to a line manager or Head of Service and ensure that your concern is detailed and factual. You may be required to write a statement, complete contact logs, or submit an online cause for concern to inform the wider DSL/ DDSL and safeguarding team. The link can be found here: [Cause for Concern - \(seashelltrust.org.uk\)](http://seashelltrust.org.uk).

Depending on what the concern is related to will determine the next course of action and may include taking guidance from the Designated Safeguarding Lead poster and contact information, Allegation Management procedures, Accident, Incident, Body Map procedure

Safeguarding procedures

Further advice from Adult Social Care in Stockport via the duty team **0161 217 6029**, Monday to Thursday from 8:30am to 5pm and Friday from 8:30am to 4:30pm. Minicom **0161 217 6024**. For out of normal office hours, call **0161 718 2118**.

Multi-agency adults at risk system - Stockport Council (MAARS) is for professionals to help them support adults who are at risk, or vulnerable, in Stockport and provides a single pathway for partner agencies and colleagues to highlight adults at risk in the community.

Next Steps:

- On-call DSL/ DDSL, Head of Service will co-ordinate a response internally and advise on external information sharing, or multi-disciplinary referrals / consultations etc.
- Support will be co-ordinated through the on-call DSL/ DDSL or Head of Service that may include, but is not limited to:
 - Immediate solution focussed discussion to agree actions that can be implemented to resolve and/ or mitigate the concern
 - Multi-disciplinary and/ or inter-agency meetings and communications
 - Internal review of Individual Support Plans (including behaviour support plan), Health Plan, risk assessment or other relevant documentation
 - Early help support through Getting care and support - Stockport Council, NHS continuing healthcare - NHS (www.nhs.uk), Benefits Information | Signpost Stockport For Carers (signpostforcarers.org.uk)

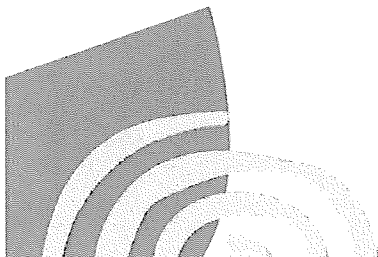
Children & Adults – Low level concerns (Code of Conduct)

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the Seashell may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work (transferable risk) that does not meet the harm threshold or is otherwise not serious enough to consider a professional allegation referral to the LADO or Adult Social Care.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately.

1. Report your concern to a line manager or Head of Service and ensure that your concern is detailed and factual.



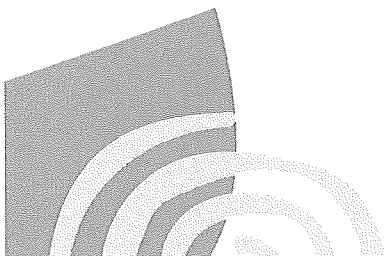
Safeguarding procedures

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

2. The Head of Service will be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL/ DDSL at the Seashell, the Heads of Service may wish to consult with the on-call DSL/ DDSL and take a more collaborative decision-making approach.
3. Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Next Steps:

- The Head of Service will take the necessary action to manage the concern as per the Low Level Concern Policy ([link here](#))
- Records of all low-level concerns will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Records will be reviewed so that potential patterns of inappropriate, problematic, or concerning behaviour can be identified by colleagues in Human Resources and across the safeguarding team.



Safe at Seashell

Body Map flowchart

Refer to the Safeguarding Policy if there are any additional risks or safeguarding concerns.

1) Behaviour Watch – Accident

An accident is an unfortunate event that happens unexpectedly and unintentionally.

2) Behaviour Watch – Incident

When there has been an incident resulting in an injury/mark on the child / adult.

2) Behaviour Watch – Body Map

Low threshold marks where there is a reasonable explanation for the mark or injury that is not suspicious.

4) Safeguarding Body Maps– Unexplained Injuries

When there is an unexplained injury there must be a conversation with a senior member of staff to determine the next course of action.

Senior members of staff must decide whether a safeguarding body map is completed and whether there is a child protection or adult at risk.

Employee who witnessed the accident or incident records the details on the Accident/Incident log on Behaviour Watch as soon as possible (during the same shift).

If there is an observed injury or mark this must be logged on the Behaviour Watch body map located within the Accident/ Incident log.

Some events will not result in any visible injuries or marks.

Employee who has observed an injury/ mark records the details on the Body Map log on Behaviour Watch as soon as possible (during the same shift).

If a child / adult has been injured in a child-on-child or a peer- on-peer incident and was the 'victim' then completion of a Behaviour Watch Body Map must be achieved as soon as possible (within the shift).

child-child/ peer-peer incident

1. If the individual causing the incident has sustained an injury then this must be recorded on an 'Incident' body map on Behaviour Watch.

2. A Behaviour Watch Body Map needs completing for the 'victim' who has sustained a visible injury/mark

Staff must complete all sections of the form and include the size (in cm's), colour, shape, location in the text box and describe the injury/ mark in detail.

Please call 07742904949

Safe at Seashell

Body Map flowchart for managers

2) Behaviour Watch – Accident
An accident is an unfortunate event that happens unexpectedly and unintentionally

2) Behaviour Watch – Incident
When there has been an incident resulting in an injury/ mark on an child / adult.

2) Behaviour Watch – Body Map
Low threshold marks where there is a reasonable explanation for the mark or injury that is not suspicious.

4) Safeguarding Body Maps – Unexplained injuries
When there is an unexplained injury there must be a conversation with a senior member of staff to determine the next course of action. Senior members of staff must decide whether a safeguarding body map is completed and whether there is a child protection or adult at risk concern.

Employee who witnessed the accident or incident records the details on the Accident/Incident log on Behaviour Watch as soon as possible (during the same shift). Observed injury or marks must be logged on the Behaviour Watch body map located within the Accident/ Incident log. Some events will not result in any visible injuries or marks.

Employee who has observed an injury/mark records the details on the Body Map log on Behaviour Watch as soon as possible (during the same shift). If a young person/child has been injured in a peer-incident and was the 'victim' then completion of a Behaviour Watch Body Map must be achieved as soon as possible (within the shift).

child-child/ peer-peer incident

1. If the peer causing the injury has sustained an injury this must be recorded on an incident body map on Behaviour Watch.
2. A Behaviour Watch Body Map needs completing for the peer (victim) who has sustained a visible injury/ mark.

Staff must complete the form, including the size, colour, shape, location and describe the injury/ mark in detail.

Senior staff will:

1. Review Behaviour Watch and all body maps to decide whether the case requires further investigation.
2. Make recommendations should there need to be a change to the individuals risk assessment/Individual Support Plan.
3. Record actions, outcomes and notifications on the appropriate log.
4. Ensure multi agency partners are informed when necessary.
5. Identify an appropriate person to notify parent/carer, Local Authority and external multi agency partners when relevant.
6. Ensure that all restraint logs are completed within 24 hours, the welfare of the child or young adult is checked within 48 hours and the case is 'closed out' within 5 days.

If there is any doubt, staff must discuss the observed injury/mark with a senior member of staff or DSL: please call 07742904949. The Seashell Trust Child Protection and Vulnerable Adults Safeguarding Policy will always be considered should there be any additional safeguarding concerns.

Confidentiality at this stage of a safeguarding enquiry is critical.

Communication must be limited to the employee who observed the injury, the senior member of staff and the DSL team until the next course of action has been agreed. Duty DSL: 07742 904949

1. A consultation between the employee who observed the injury and a senior member of staff. Senior member of staff will use their professional judgement to ascertain whether this is an unexplained injury that is suspicious and concerning, the child / adult is at risk of significant harm or an allegation of professional abuse.
2. The Senior staff member will ask for a paper safeguarding body map to be completed. There must be no further communication about this body map with anyone until the DSL Team have been consulted.

3. Senior member of staff will then refer to a DSL. Each department must identify how they will provide notice to a DSL member (scan, email, telephone).

If this is an allegation of professional abuse, do not inform the member of staff who has been accused.

- RSM: Hand deliver or scan paper copy to Head of School and on-call DSL immediately
 - RCM: Hand deliver or scan paper copy to Head of College and on-call DSL immediately
 - Young Adults and Children's Residential (days): Hand deliver or scan the paper body map to the coordinator who will then consult the on-call DSL via phone.
 - Young Adults and Children's Residential (nights): Hand deliver or scan the paper body map to the coordinator who will then consult the on-call DSL via phone.
4. The DSL lead will follow the procedures outlined within the Seashell Trust Safeguarding Policy.
 5. All decisions and actions taken will be documented and stored on the restricted safeguarding library on Sharepoint.

Seashell

SAFEGUARDING POLICY (SEPT 23)

Appendix 5

Allegation Management Table

Adult workforce Staff, volunteer, Agency worker concerns including any service leasing or using services on the Seashell site	Children's workforce Staff, volunteer, Agency worker concerns including any service leasing or using services on the Seashell site
<p>If an adult is in immediate danger, you should call the police on 999.</p> <p>Allegation reported to Seashell manager who will notify the DSL.</p>	<p>If a child is at risk of harm or in immediate danger you should call the police on 999.</p> <p>Allegation reported to Seashell manager who will notify the DSL.</p>
<p>Basic enquiries and initial fact find reviews will ensue before contacting Social Care to establish the facts and help determine whether there is foundation to the allegation, being careful not to jeopardise any future police investigation.</p>	
<p>If the initial review identifies that the threshold is met for statutory referral. The DSL must consider:</p> <ul style="list-style-type: none"> • the welfare of the adult/ child at risk • investigating and supporting the person subject to the allegation 	
<p>DSL will nominate a case manager to lead the investigation.</p> <p>If the case manager is concerned about the welfare of others, they should discuss these concerns with Adult Social Care and the DSL.</p>	<p>DSL will nominate a case manager to lead the investigation.</p> <p>If the case manager is concerned about the welfare of others, they should discuss these concerns with LADO and the DSL.</p>
<p>The Strategy discussion with Adult Social Care and police will determine who will lead the investigation. Where it is clear that police will not progress, the chair of the Strategy meeting, nominated Local Authority Investigating Officer and case manager will discuss next steps depending on the harm level assigned.</p>	<p>The Strategy discussion with LADO and police will determine who will lead the investigation.</p> <p>Where it is clear that police will not progress, the LADO and case manager will discuss next steps.</p>
<p>When to inform the individual of the allegation should be considered on a case-by-case basis.</p>	
<p>DSL / Safeguarding Officer may initiate an internal strategy meeting to prepare a Protection or Trauma plan for the victim and / or risk assessment for the member of staff.</p> <p>Confidentiality and data share will be limited to specific group.</p>	
<p>Notify Head of Service / Registered Manager to ensure arrangements are made to mitigate and manage potential risks (i.e. manage the staff absence, shift change or change of role)</p>	<p>Notify Head of Service / Registered Manager to ensure arrangements are made to mitigate and manage potential risks (i.e. manage the staff absence, shift change or change of role)</p>

<p>(Adults Residential services will need to consider the harm level).</p>	<p>(Children's Residential Care services will need to consider Reg 44 referral to Ofsted)</p>
<p>Nominated representative in safeguarding to support the investigation as required.</p> <p>Human Resources to employ the duty of care principle in support of the employee.</p>	
<p>Where there are further enquiries required the case manager should monitor the progress of the case to ensure they are dealt with quickly and fairly.</p> <p>Suspension must be considered carefully and only implemented where there is cause to suspect that people who use our services are at risk or cases so serious there may be grounds for dismissal.</p> <p>Advice from Human Resources.</p>	
<p>Allegations against a temporary or agency employee will follow these procedures to ensure a fair and responsible review in line with statutory procedures and the Seashell Service Level Agreement signed by the Agency.</p>	
<p>Confidentiality must be maintained at all times. The Education Act 2011 makes it an offence to publish material that leads to the identification of a teacher in a school/ college who is subject to an allegation.</p>	
<p>Allegations outcomes:</p> <p>Substantiated allegations assigned through Adult Social Care procedures will then be considered in another report to determine whether Disciplinary procedures at Seashell will progress.</p> <p>Human Resources and an Investigating Officer will progress the necessary actions.</p>	<p>Allegations outcomes:</p> <p>Substantiated allegations assigned through LADO procedures will then be considered in another report to determine whether Disciplinary procedures at Seashell will progress.</p> <p>Human Resources and an Investigating Officer will progress the necessary actions.</p>
<p>Seashell recognise the legal requirement to make a DBS referral or notify the relevant regulatory body if an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person poses a risk of harm to a child.</p> <p>This would include a transferable risk if the allegation is substantiated due to harm or conduct likely to have caused harm to an adult at risk.</p>	<p>Seashell recognise the legal requirement to make a DBS referral or notify the relevant regulatory body if an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person poses a risk of harm to a child.</p>

<p>Unsubstantiated, unfounded or malicious allegations:</p> <p>In these instances the case manager should consider what support the person making the allegation may require. In such cases there may be a need to refer to the Local Authority.</p> <p>Disciplinary action will be considered for malicious allegations.</p>	<p>Unsubstantiated, unfounded or malicious allegations:</p> <p>In these instances the case manager should consider what support the person making the allegation may require.</p> <p>The case manager should consider if the child / person making the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such cases, there may be a need to refer to the Local Authority children's social care team.</p> <p>Disciplinary action will be considered for malicious allegations.</p>
<p>Record keeping:</p> <p>Malicious or false allegations – all records will be removed from personnel records unless consent for retention is received.</p> <p>Substantiated, unfounded and unsubstantiated cases will be retained as per the Safeguarding departmental document management procedures.</p> <p>Schools and colleges have an obligation to preserve records about allegations of sexual abuse until the accused has reached normal pension age or for a period of 10 years from the date of the allegation is that is longer.</p>	
<p>Adults self-reporting or through family / carers about non recent allegation of abuse should be directed to refer the concern to the Local Authority / Police.</p> <p>Abuse can be reported no matter how long ago it happened.</p>	<p>Non recent allegations should be directed to the LADO in line with the Local Authority's procedures for dealing with non-recent allegations.</p> <p>Abuse can be reported no matter how long ago it happened.</p>
<p>Failure to report and progress an allegation of professional abuse is unacceptable and will be regarded and dealt with as a failure to meet safeguarding and statutory responsibilities to safeguard. This could result in disciplinary / legal procedures.</p>	

Seashell

SAFEGUARDING POLICY (SEPT 23)

Appendix 6

Appendix 6 Specific categories of abuse and Types of discriminatory abuse

- **Physical abuse:** abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, rough handling, slapping, biting, forcible feeding or withholding food. Unlawful use of physical, mechanical and chemical restraint or any other cause of physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a person or through the misuse of medication.
- **Emotional abuse:** the persistent emotional maltreatment of another individual such as to cause severe and adverse effects on the people who use our service's emotional development. It may involve conveying that the people who use our services is worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the people who use our services opportunities to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate and preventing the expression of choice and opinion - psychological restraint.

Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance. It may also feature age or developmentally inappropriate expectations. These may include interactions that are beyond the ability of the person using our service's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the people who use our services from participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may also involve serious bullying (including cyberbullying), causing people who use our services frequently to feel frightened or in danger, or the exploitation or corruption of people who use our services. Failure to respect privacy. Some level of emotional abuse is involved in all types of maltreatment, although it may occur alone.

- **Sexual abuse:** forcing or enticing a people who use our services to take part in sexual activities, not necessarily involving violence, whether or not the people who use our services is aware of what is happening. The activities may involve:
 - **Physical contact**, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. Any sexual activity that the person lacks the capacity to consent to.
 - **Non-contact activities**, such as looking at, or in the production of, sexual images, watching sexual activities, indecent exposure, encouraging children or adults at risk to behave in sexually inappropriate ways, or grooming in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse can be perpetrated by men, women, or other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse and harmful sexual behaviour) and set out separately in this policy.

- **Neglect and acts of omission:** the persistent failure to meet care and support needs of a child or adult at risk though neglect of their basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy - for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment) or protect a child from physical and emotional harm or danger.
 - Ensure adequate supervision (including the use of inadequate caregivers).
 - Ensure access to appropriate medical care or treatment. It may also include neglect of or unresponsiveness to basic emotional needs.
- **Self-Neglect** is reported mainly as occurring in older people, although it is also associated with mental ill health. Differentiation between inability and unwillingness to care for oneself, and capacity to understand the consequences of one's actions, are crucial determinants of response. The Seashell acknowledge the importance of self care and endeavour to promote this through active support, independence and life skills for our adult cohort in education and residential care services. This is reflected in the [Care Act 2014 \(legislation.gov.uk\)](https://www.legislation.gov.uk) and is a key objective in [Stockport's safeguarding children and adults strategic plan 2020-23](#)
 - **Financial or material abuse:** The theft of money or possessions, fraud, scamming, preventing a person from accessing their own money, benefits or assets. Employees taking a loan from a person using the service, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions.

Arranging less care than is needed to save money to maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in a family home. Someone moving into a person's home and living rent free without agreement or under duress, false representation, using another person's bank account, cards or documents. Exploitation of a person's money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy, appointee ship or other legal authority. Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

Types of discriminatory abuse

Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as '**protected characteristics**' under [Equality Act 2010 \(legislation.gov.uk\)](https://www.legislation.gov.uk))

Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic

Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader. Harassment or deliberate exclusion on the grounds of a protected characteristic. Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic. Substandard service provision relating to a protected characteristic.

Types of organisational or institutional abuse

Discouraging visits or the involvement of relatives or friends, run-down or overcrowded establishment, authoritarian management or rigid regimes, lack of leadership and supervision, insufficient staff or high turnover resulting in poor quality care.

Abusive and disrespectful attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or assistance with eating. Not offering choice or promoting independence (psychological restraint), misuse of medication, failure to provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious or ethnic needs.

Failure to respond to abuse appropriately, interference with personal correspondence or communication, failure to respond to complaints.

Warning signs of exploitation vary for the people who use our services given the complexity of their special educational needs and disabilities. Therefore, the following information is acknowledged and framed in the context of our organisational setting, evidencing compliance to national legislation to protect children and adults from exploitation. Whatever the form of abuse or neglect, practitioners should put the needs of people who use our services first when determining what action to take

Exploitation

All staff should be aware that child criminal exploitation (CCE) – including county lines and child sexual exploitation (CSE) can also involve adults at risk of abuse and neglect and children of any gender no matter of their sexual orientation. As with other types of abuse, there is an increasing risk of exploitation taking place or beginning through threats posed online. Staff should also be aware:

- That children and adults at risk who have been exploited in this way are victims themselves – and that this is sometimes not recognised by professionals.
- That CCE can lead to CSE for both boys and girls
- Children can be moved from place to place in order to exploit them (trafficked).
- Children who have been involved in this type of abuse may need extra support to stay in education.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. Children can be moved from area to area – this is known as trafficking. Involvement in this type of abuse can be as a direct result of threats of serious violence to the young person or their family.

The victim can be exploited even when the activity appears to be consensual. Further, it does not always involve physical contact but can happen exclusively online.

Further information can be found here: [CCE \(programmechallenger.co.uk\)](http://programmechallenger.co.uk) [Criminal Exploitation of children and vulnerable adults: County Lines guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614222/county-lines-guidance.pdf)

Serious violent crime

Despite the complexity of our people who use our services group, it is important that this category of abuse is noted and reflected in the Seashell's commitment to safeguarding. All staff to be aware of the indicators of this form of abuse:

- Increased absence from education.
- A change in friendships or relationships with older individuals or groups.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs, and may be at risk of criminal exploitation.

Child sexual exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator, and/or • by threats of serious violence to the victims and their family.

It can be a one-off or part of a series of acts over time and can be opportunistic or organised abuse. It can be perpetrated by men or women, and peers can be involved. Victims of this type of abuse can be male or female. The victim may be subject to criminal exploitation and may be trafficked for the purpose of exploitation.

The victim may have been sexually exploited even if the activity appears consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge - for example, through others making copies of recordings or images.

- A child under the age of 13 can never consent to any sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- Underage sexual activity.
- Inappropriate or risky sexual or sexualised behaviour.
- Receiving unexplained or unaffordable gifts or gifts from unknown sources.
- Getting in/out of different cars driven by unknown adults.
- Being involved in abusive relationships, intimidated, and fearful of certain people or situations.
- Unexplained changes in appearance, behaviour, or personality (chaotic, aggressive, sexual, etc.).
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- Injuries from physical assault, physical restraint, sexual assault.

Further information can be found here: [CSE | It's Not Okay \(itsnotokay.co.uk\)](https://www.itsnotokay.co.uk)

Adult sexual exploitation

Adult sexual exploitation is when acts are in exchange for basic necessities, such as food, shelter or protection or for something that is needed or wanted, when an individual has felt frightened of the consequences if they refuse (coercion), if the person who is exploiting stands to gain financially or socially.

It is important to remember that there are several scenarios that fall under this definition and sometimes sexual exploitation can be hard to identify.

Both men and women can be sexually exploited. It can take place in a domestic, commercial (workplace) or public setting. Crucially, the individual that is, or has been, subject to sexual exploitation may not realise it, which makes it more important that practitioners are able to offer clear concise explanations and advice.

It is also worth being mindful of identified factors that increase the risk of sexual exploitation in adulthood including:

- homelessness
- use of drugs or alcohol
- lack of mental capacity to consent to sexual activity
- human trafficking
- sexual abuse during childhood

The [Care Act 2014 \(legislation.gov.uk\)](https://www.legislation.gov.uk) (section 42) places a duty on local authorities to make enquiries if there are concerns that an adult with care and support needs is experiencing or at risk of abuse or neglect, and, as a result of those needs, is unable to protect themselves. This applies, for example, where an adult discloses sexual exploitation / organised abuse or if a member of the public or parent expresses concerns about an adult.

So called honour-based abuse: Forced Marriage (FM)

This is an entirely separate issue from an arranged marriage. Forced Marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic abuse. It is also a criminal offence to force a person to marry in England and Wales.

Young men and women can be at risk in affected ethnic groups. Evidence shows that the issue of forced marriage affects certain sectors of communities, typically girls in the age range of 14 – 16 years old originating from Pakistan, India, and Bangladesh (approx. 60% of the cases) together with a percentage of cases of children originating from the Middle East and African countries. However, it can affect boys and children with SEND.

A signal of FM is the removal of the child from school and lengthy absence which is often unexplained. Other indicators may be detected by changes in adolescent behaviours. Whistleblowing may come from younger siblings. Any member of staff at Seashell with any concerns should report this immediately to the DSL, who should raise the concern with the Local Police Safeguarding Unit by email or phone. Never attempt to intervene directly as a school or through a third party. Whilst the onus of the investigation for criminal offences will remain with the Police, the DSL should co-operate and liaise with the relevant agencies in line with current child protection responsibilities.

Further information can be found here: [So-Called Honour-Based Abuse and Forced Marriage: Guidance on Identifying and Flagging cases | The Crown Prosecution Service \(cps.gov.uk\)](#)

So called honour-based abuse: Female Genital Mutilation (FGM)

Children under 18 years:

There is a specific legal duty on regulated professionals regarding FGM. If, during the course of their work, a member of staff discovers that an act of FGM appears to have been carried out on a **girl under**

the age of 18 years, then they must report it to the police. All staff at Seashell will recognise this responsibility.

The 'One Chance' rule.

As with Forced Marriage, there is the 'One Chance' rule regarding FGM. This refers to staff potentially only having one chance to speak to a potential victim and thus may only have one chance to save a life. It is essential that the Seashell acts without delay.

What is FGM?

Female genital mutilation involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

FGM is a criminal offence.

All staff at Seashell will be made aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM.

All regulated professionals have a mandatory responsibility to report FGM if they discover, in the course of their professional duties what appears to be FGM to the police. The DSL, who will offer support, should also be informed immediately. Circumstances and occurrences that may point to FGM happening include:

- The child talking about getting ready for a special ceremony.
- The child and their family taking a long trip abroad.
- The child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghani, Kurdistan, Indonesia, and Pakistan).
- Knowledge that the child's sibling has undergone FGM.
- The child talking about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities.
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs.
- Mentioning something somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinal tract infections.
- Disclosure of abuse.
- Further guidance and information are available from: **NSPCC FGM Helpline: 24 hours Tel: 0800 028 3550 Email: fgmhelp@nspcc.org.uk**

Further information can be found here: [Female Genital Mutilation - Prevent & Protect | NSPCC](#)

Adult women (over 18 years of age:

There is no requirements for automatic referral of adult women with FGM to adult social services or the police. Professionals should be aware that any disclosure may be the first time that a woman has ever discussed her FGM with anyone. A referral to the police should not be an automatic response for

all adult women who are identified as having had FGM, Cases must be individually assessed, but given all people who use our services at Seashell have complex learning disabilities and special educational needs, due regard must be given to their vulnerability and capacity and as such all matters should be referred to Adult Social Care.

In all cases it is also important to consider whether the individual and/or her family are known to social services, and whether there are existing safeguarding arrangements in place.

Further information can be found here: [Female genital mutilation: help and advice - GOV.UK](https://www.gov.uk/government/topics/female-genital-mutilation)
(www.gov.uk)

Child-on-child / adult at risk-on-adult at risk abuse:

All staff at Seashell must be aware that children can abuse other children (referred to as child-on-child abuse). At Seashell, situations that arise between adult service users, whether this is a behavioural incident or abuse between adults is referred to as 'peer-on-peer'.

Given the complexity of people who use our services at the Seashell incidents of non-consensual contact may occur through physical contact or verbal exchange/ vocalisations. Given the nature of the cohort at the Seashell it is important that the potential indicators of this form of abuse is acknowledged but considered with caution in the context of our setting.

The Seashell will not be complacent and recognises that this form of abuse is most likely to include, but may not be limited to:

- Bullying, including cyberbullying, prejudiced-based, and discriminatory bullying.
- Physical abuse, such as hitting, biting, kicking, shaking, hair-pulling, or causing physical harm.
- Sexual violence, such as rape, assault by penetration, and sexual assault.
- Sexual harassment and online sexual harassment, such as that which takes place on social media or chat rooms, which may be stand- alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery).
- Upskirting, which is a form of abuse that has been high on school and court agendas for a number of years and is a criminal offence in its own right under the Voyeurism (Offences) Act 2019. Upskirting occurs when someone takes a picture under a person's clothing, with or without underwear, without permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm. It is a common aspect of peer-on-peer abuse and can happen to any gender.
- Initiation/hazing type violence and rituals. This could include activities involving harassment, abuse, or humiliation, used as a way of initiating a person into a group. It may also include an online element.

Sharing nude/semi-nude images (sexting)

If you are made aware of an incident involving the sharing of nude or semi-nude images (also known as sexting and 'youth-produced sexual imagery'), you must report it to the DSL/ DDSL or Head of Service immediately.

You must not:

- View, download, or share the imagery yourself, or ask a service user to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the service user to delete it.
- Ask the individual(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the individuals(s) it involves, or their, or other, parents and/or carers.
- Say or do anything to blame or shame any people involved.

You should explain that you need to report the incident and reassure the individual(s) that they will receive support and help from the DSL.

Further information can be found here: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Staff who are concerned about any of these issues should, as with any other concern, speak to the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate. It may be that, if the concern is raised at an early stage, the individual can be supported through the Early Help procedures.

Domestic abuse:

Exposure to domestic abuse can have a serious, long lasting emotional and psychological impact.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Operation Encompass (education)

This initiative helps police and schools work together to provide emotional and practical help to children who have been involved in domestic abuse. When the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) before the child or children arrive at school the following day. This ensures that the school has up to date and relevant information about the child's circumstances and can enable support to be given to the child according to their needs. DSLs should endeavour to alert relevant pastoral support staff as soon as possible where this is appropriate.

The Royal School and the Royal College are signed up to this initiative with trained key adults. [Home : Operation Encompass](#)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to welfare and can pose serious safeguarding, child protection and adult at risk concern. There is also now a Homelessness Duty imposed through the [Homelessness Reduction Act 2017 \(legislation.gov.uk\)](https://www.legislation.gov.uk), which places a duty on local authorities to intervene at earlier stages to prevent homelessness in their areas. This extends

to all social services functions, including Early Help, and is intended to increase early identification and intervention.

Earlier intervention can help prevent people becoming homeless. Where a child is - or is at risk of becoming homeless and has been harmed or is at risk of harm, the DSL will also make a referral to children's social care. Similarly where an adult at risk is – or is at risk of becoming homeless and has been harmed or is at risk of harm, the DSL will also make a referral to Adult Social Care.

Modern Slavery

Types include:

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to

GOV.UK has more information on [identifying and reporting modern slavery](#)

Seashell

SAFEGUARDING POLICY (SEPT 23)

Appendix 7

Seashell Trust Mandatory and Specialist Safeguarding Training for Children and Vulnerable Adults

Safeguarding Children/Adults Staff Group	Essential baseline	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6
Requirement	All Trust staff inc Executive Members, casual staff and Volunteers (All postholders)	Face to face contact with CYA and families (e.g. Reception staff, FM Team, Catering Team, Volunteers)	Face to face regular contact with CYA and families as part of employed role (e.g. All Social Care staff, All Education staff, All Health staff, Family Services, All Active staff)	Staff who have responsibility for decision making / MDT (specialist staff) or conducting internal investigations when safeguarding concern / LLC raised (e.g. Front line managers / DMs, AAs and HN) / shift leads in care situation, health, family services and specialist roles e.g. PBS Lead, Mx Lead, HRBPs All Recruitment Managers	Staff who are named and have designated responsibility (e.g. DSL, Deputy DSL and Senior Social Worker (Safeguarding)) - On Call Manager and Care Co-ordinator (SPO)	Executive - Board members, Governors, Seashell Leadership Team	External parties who have a key role in supporting / have contact with CYA and Families (e.g. Taxi Drivers and Escorts; External Residential Care Providers; External E.H and C professionals; Families / Carers)
Children Specific in addition	Induction Training and eLearning modules - none contact and *contact staff: Childrens & Adults Safeguarding PREVENT *Intimate Personal Care *Relationships and Sex Education (Eating and Drinking) Guidelines Engaging with Families/Cares PBS *MCA Awareness Training + Dept Specific Induction Safeguarding annual refresher by default/none of L&D Team	Oliver McGowan (Autism) Awareness training	Oliver McGowan (Autism) Awareness training	Oliver McGowan (Autism) management/implementation training	* / ** DSL training Childrens; DSL training Adults; * Prevent SPOC; ** Cadcock Training; *** On Call and Care Co-ordinators annual review; Herbert Protocol https://www.gmp.police.uk/notices/hp/herb-protocol/ Oliver McGowan (Autism) management/implementation training	https://learning.nspcc.org.uk/training/safeguarding-charity-trustees ; Safeguarding Network training; https://www.scie.org.uk/training/safeguarding/trustees ; https://www.gov.uk/guidance/safeguarding-for-charities-and-trustees ; NGA https://www.nga.org.uk/training-and-development/all-training-modules/safeguarding-an-introduction.aspx	
Adult Specific in addition	Nothing About me without me - example https://www.bsuh.nhs.uk/library/wp-content/uploads/sites/8/2020/06/Safeguarding-adults-at-risk-guideline.pdf ; Herbert Protocol https://www.gmp.police.uk/notices/hp/herb-protocol/	Essential + Childrens Basic Safeguarding Awareness (SMBC link)	Essential + Safeguarding Basic Awareness / Level 2 (SMBC link) Care quart Oliver McGowan training	Level 3 Childrens Safeguarding; Seashell Carrying Out Investigations; Alert Training; Safer Recruitment Training (NSPCC / SMBC); Children and Families Act; MCA Assessor (eLearning and Classroom)			
Health and Wellbeing Specific in addition	Essential + [xxx]	Essential + Health Safeguarding Basic Awareness; MCA Awareness (eLearning and Classroom)	Essential + Safeguarding Basic Awareness; Sports Safeguarding Basic Awareness; MCA Awareness (eLearning and Classroom)	Level 3 Safeguarding Adults (SMBC); Seashell Carrying Out Investigations; Safer Recruitment Training (NSPCC / SMBC); Care Act (SMBC); MCA Assessor (eLearning and Classroom) Oliver McGowan Training			
None Contact Staff	Essential + Eating & Drinking Guidelines (Catering Team / Volunteers)	Childrens / Adults Basic Safeguarding Awareness (SMBC link) MCA Awareness (eLearning and Classroom)	Childrens / Adults Basic Safeguarding Awareness (SMBC link) MCA Awareness (eLearning and Classroom)	Level 3 Childrens/Adult Safeguarding (SMBC); Safer Recruitment Training (NSPCC / SMBC); Care Act (SMBC); Alert Training; Children and Families Act; LLC; MCA Assessor (eLearning and Classroom); https://learning.nspcc.org.uk/training/child-protection-safeguarding-sport ; https://www.sportengland.org/guidance-and-support/safeguarding ; https://www.gov.uk/guidance/safeguarding-for-charities-and-trustees ; https://www.ukcoaching.org/courses/worksheets/safeguarding-protecting-children ; https://www.voiceability.org/assets/downloads/ASTOMP-2021/B.pdf			

Competencies	Can recognise signs and symptoms; Can take appropriate action and raise concern	Clear about own and colleagues roles, responsibilities and professional boundaries; Shares appropriate and relevant information with other teams; Aware of how to raise safeguarding alert in own setting	Recognises potential impact of parent/carer's physical or mental health on wellbeing of child / young adult; Understanding of harm levels and reporting thresholds; Understanding of Mental Capacity, consent and DOLs; Documents concerns to inform relevant staff, maintains record keeping and differentiates between fact and opinion;	Detailed understanding of Saasehel Safeguarding Policy, procedures and multi-agency roles and responsibilities; Acts in accordance with key statutory and non-statutory guidance and legislation inc. UN Convention on Rights of the Child and Human Rights Act; Has professional relevant competencies and can draw on knowledge and experiences to ID signs of abuse/safeguarding concerns; Contributes to internal MDT and inter-agency assessments, information gathering and sharing; Documents concerns in a manner that is appropriate for safeguarding/CP and legal processes; Undertakes regular document review of own and teams safeguarding / CP practice as appropriate to role through audit, case discussion, peer review, supervision and refresher training	Extensive knowledge of local and national safeguarding legislation, practice and its local application; Works with other professionals/agencies with CYA and families when there are safeguarding concerns; Advises other agencies about E.C.H of individual child in CP / Safeguarding cases; Applies lessons learnt from audit and case management reviews to improve practice; Advises others on appropriate information sharing; Demonstrates how information sharing is key to safeguarding and the impact of new legislation; Understand the escalation process and how to use it to manage disagreements or conflict between organisations; Be able to manage allegations against the workforce and identify the local protocol; Be able to recognise how agencies must work together to assess, identify review and meet the needs of the children where there are safeguarding concerns; Increase awareness around identifying, managing and defending risk and how this can help when overseeing, supervising and assessing the competency of staff including the importance of reflective supervision; To understand what constitutes a complex child abuse investigation and the structures and functions	Clear understanding of roles and responsibilities (as appropriate); Role and Commission Safeguarding requirements; ROSIE Governor training; Understanding Safeguarding Practice and the new process of Child Safeguard Practice Reviews	Clear understanding of Saasehel Safeguarding protocols and point of contact to raise any safeguarding concerns; MCA; Preparing for adulthood and transitions;
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