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<b>1. Definition(s)</b>	
<p><b>Staff:</b> This policy applies to all ‘staff’ whether working in, or on behalf of, the education, health, family, care services, to all support staff as a paid employee including agency staff, to workers or contractors, or unpaid members of staff or volunteers. It also includes anyone who is part of the Governing Body, all Trustees and all Directors.</p> <p><b>Children/Child:</b> A person up to (but excluding) the age of eighteen years.</p> <p><b>Adult:</b> A person aged eighteen years of age and over.</p> <p><b>Adult at risk of abuse or neglect:</b> Section 42 <a href="https://www.legislation.gov.uk">Care Act 2014 (legislation.gov.uk)</a> Where a local authority has 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); and/or (b) is experiencing, or is at risk of, abuse or neglect; and/or (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> <p><b>People who use our services:</b> All people who access Seashell services (excluding staff and/or volunteers).</p> <p><b>Child-on-child abuse:</b> Any form of abuse or violence (including harmful sexual behaviour) between children under eighteen years of age.</p> <p><b>Adult at risk-on-adult at risk:</b> Any form of abuse or violence (including harmful sexual behaviour) between adults.</p> <p><b>Designated Safeguard Lead (DSL):</b> A person who provides support to all staff to carry out their safeguarding duties and who works closely with other service providers such as a local authority children’s and adult’s social care.</p> <p><b>Deputy Designated Safeguard Lead (DDSL):</b> A person who will deputise for the DSL.</p>	
<b>2. Purpose</b>	
<p>The purpose of this policy is 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 to enable them to adhere 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>	
<b>3. Intended Outcomes</b>	
<p><b>All Staff</b> working at the Seashell share a responsibility for the protection and well-being of all people who use our services. It is <b>everyone’s responsibility</b> to ensure that the people who are vulnerable are safeguarded and protected from abuse.</p>	
<b>4. Link to Mission / Statement of Purpose</b>	
<p><b>Mission:</b> Seashell helps children and young adults with the most complex needs, and their families to live their best lives.</p>	
<b>Vision</b>	

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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.

1. To provide exceptional education, care, and health and 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.

## 5. Guiding principles and reasons for the Policy

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.

## 6. 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.

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, 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 within the care system and are looked after, or have been previously looked after, or have a social worker.

### Accessibility

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

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## 7. Procedures - hyperlinks

- [Safeguarding - Appendix 2 Safeguarding procedures 2024.24.](#)
  - **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**
- [Safeguarding - Appendix 3 Allegation management procedures 2024](#)
- [Safeguarding - Appendix 4 Body Map flowchart.](#)
- [Safeguarding - Appendix 4 Body Map flowchart for managers.](#)

## 8. Seashell safeguarding team

Role	Name and email	phone number
Designated Safeguarding lead (DSL)	Nikola.giles@seashelltrust.org.uk	0161 610 0116
Head of Safeguarding	Sarah.ringwood@seashelltrust.org.uk	0161 610 0118
Director of Education and Care	Bernie.white@seashelltrust.org.uk	0161 610 0120
Head of School	Emma.houldcroft@seashelltrust.org.uk	0161 610 0172
Head of College	Clare.sefton@seashelltrust.org.uk	0161 610 0150
Head of Service: Registered Manager Young Adults Residential	Debbie.Gittins@seashelltrust.org.uk	0161 610 0746
Interim Head of Children’s Residential Care Service	<a href="mailto:Garry.nelson@seashelltrust.org.uk">Garry.nelson@seashelltrust.org.uk</a>	0161 610 0169
Head of Clinical Services Development	Tamsin.Rowbotham@seashelltrust.org.uk	0161 610 0136

## 9. Contacting the 24/7 on-call designated safeguarding leads - **0774 290 4949**

[Safeguarding - Appendix 1 Safe at Seashell - DSL Poster Oct 2024.](#)

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.

- The DSL/ on-call DDSL must ensure the safeguarding concern / allegation is acted on immediately and must determine the most appropriate course of action.
- Where the safeguarding concern / 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.

If the concern meets the threshold for intervention, the local authority’s 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.

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If the concern meets threshold for intervention, adult social care will begin assessments and investigations under the [Care Act 2014 \(legislation.gov.uk\)](https://www.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.

- Where the risk is less serious, the DSL may start the procedure for **early help (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.
- Teaching staff and other regulated professionals are responsible for reporting concerns relating to FGM. More detailed guidance can be found here [Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Discuss the concern with the DSL, who will offer support and help.

#### 10. If a member of the safeguarding team or 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.
- 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, DDSL or Head of Service, or contact the local authority children's or adult's services to determine the most appropriate way to proceed.
- Where referrals are not made by the DSL, the DSL should be informed as soon as possible, that a referral has been made.

#### 11. Stockport Council safeguarding contacts and emergency details

	<b>During Office Hours</b>	<b>Out of office hours</b>
<b>Adults</b>	<p>If the Adult is at immediate risk of harm call emergency services - <b>999</b>.</p> <p><a href="#">Report a concern about abuse of an adult - professionals only - Stockport Council</a></p> <p>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.</p>	<p>Out of hours emergencies call us on 0161 718 2118.</p>
<b>Children</b>	<p>If the Child is at immediate risk of harm call emergency services - <b>999</b>.</p> <p><a href="#">Contacting the MASSH - Stockport Council</a></p> <p>All professional referrals should be completed through the online form. 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.</p>	<p>Out of hours emergencies call us on 0161 718 2118.</p>

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<p>Health Non-emergency 111 <a href="#">Get medical help - NHS 111</a> Emergency 999</p> <p>Criminal Non-emergency 101 Emergency 999</p> <p>Prevent and Channel <a href="#">Prevent and Channel in Stockport - Stockport Council</a> If it's an emergency, dial <b>999</b>. If you suspect it, report it. If you consider anything to be suspicious or connected with terrorism, contact Greater Manchester Police on the non-emergency number <b>101</b> or the Anti-Terrorist Hotline on <b>0800 789 321</b>. Other ways to report: <a href="#">ACT Early   Prevent radicalisation</a> You can call it on <b>0800 011 3764</b>.</p> <p><b>ALLEGATIONS - PROFESSIONALS WHO WORK WITH CHILDREN</b></p> <p><b>Local Authority Designated Officer (LADO) Children's workforce:</b> <b>Fiona Batchelor</b> <a href="mailto:Fiona.batchelor@stockport.gov.uk">Fiona.batchelor@stockport.gov.uk</a> <a href="mailto:stockport.lado@stockport.gov.uk">stockport.lado@stockport.gov.uk</a> Work mobile: 07891 949279 Office: 0161 474 5657 (Reception-checked hourly) <a href="http://www.stockport.gov.uk/start/contact-the-lado">www.stockport.gov.uk/start/contact-the-lado</a></p> <p><b>ALLEGATIONS - PROFESSIONALS WHO WORK WITH ADULTS:</b></p> <p><b>Adult Social Care Contact Centre</b> <a href="mailto:adultsocialcare@stockport.gov.uk">adultsocialcare@stockport.gov.uk</a> 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.</p>	<p>If a Child is at an immediate risk of harm, call the police on 999.</p> <p>All professional referrals should be completed through the online form after consultation with the DSL/ on-call DDSL.</p> <p>If you think the LADO requires this information immediately, you should call <b>0161 474 5657</b>. After your discussion with the LADO, you may be advised to complete the online form. All contacts with LADO should be referred to the DSL/ DDSL.</p> <p>If an Adult is in imminent danger, call the police on 999. If the Adult is not in danger 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.</p> <p>All professional referrals should be completed through the online form after consultation with Stockport Adult Social Care: <a href="#">Report suspected abuse or neglect - Stockport Council</a> <b>0161 217 6029</b>, or <b>0161 217 6024</b> for the Minicom or online</p>
<p><b>12. Allegations of abuse</b></p>	
<p>Where an allegation of abuse is made against a member of Staff 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.</p>	

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Seashell has adopted the position outlined in [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://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.

(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/they is unsuitable to work with a Child/ren.

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 \(legislation.gov.uk\)](https://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 local authority is meeting any of those needs); and/or
- (b) is experiencing, or is at risk of, abuse or neglect; and/or
- (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 (a “**transferable risk**”).

**Internal allegation management procedures:**

Seashell comply with [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) Part 4a: Managing Allegations of Professional Abuse, although Seashell recognise the different obligations for Adult social care reflected in the [Care Act 2014 \(legislation.gov.uk\)](https://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 Trustees immediately, and the Chair of the Trustees will assume the role of “**case manager**”.

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

(2) **Low Level Concerns:** low-level concerns are those which do not meet the threshold for referral to a LADO, to adult social care, or to 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.

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

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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.

Part 4, 'Learning Lessons'(420-421) in [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/125422/keeping-children-safe-in-education-2024.pdf) will be considered and discussed as required in the internal safeguarding meetings and within the Safeguarding Board meetings to enhance scrutiny.

More detailed procedural guidelines can be found in [Appendix 8 Low Level Concern procedural guidelines 2024.docx \(sharepoint.com\)](#)

### 13. Safeguarding children

Safeguarding and promoting the welfare of Children as defined in [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/125422/working-together-to-safeguard-children-2023-statutory-guidance.pdf)

- providing help and support to meet the needs of Children as soon as problems emerge;
- protecting Children from maltreatment, whether that is within or outside the home, including online;
- 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;
- promoting the upbringing of Children with their birth parents, or otherwise their family network, through a kinship care arrangement, whenever possible and where this is in the best interests of the Children; and
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

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

### 14. 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 are, or may be unable to, take care of themselves, or unable to protect themselves against significant harm or exploitation.
- In respect of 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 and (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 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1998/42).
- Making sure people's wellbeing is promoted, taking their views, wishes, feelings and beliefs into account. [Mental Capacity Act 2005 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2005/9) [Safeguarding people - Care Quality Commission \(cqc.org.uk\)](https://www.cqc.org.uk)
- Seashell complies with the [The Caldicott Principles - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/the-caldicott-principles)

Seashell work in partnership and collaboration with the Stockport Safeguarding Children Partnership [Safeguarding Children in Stockport](#) and Safeguarding Adults in Stockport ([Safeguarding Adults in Stockport](#)).



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## **15. 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. 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.

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.

## **16. 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.

[Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) describes a Child-centred approach within a whole family focus and at Seashell we endeavour to provide the same level of support for our Adult service users where required.

- 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.
- 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.
- Parents and carers need to understand what is happening, what they can expect from the help and support provided, what is expected of them and be supported to say what they think.
- Work with parents/carers to raise awareness of threats posed online and other safeguarding priorities.
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers. [Compliments and Formal Complaints Policy and Procedure \(sharepoint.com\)](#)
- Seashell will notify the parents or carers of service users where there are significant safeguarding concerns and where there is no increased risk to the individual or others by doing so. Wherever necessary, we will discuss this with the Local Authority social care team before doing so.

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At 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.

## 17. 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 FGM 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.

## 18. 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 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.

[Philomena Protocol | Greater Manchester Police \(gmp.police.uk\)](#) is an initiative to help locate and safely return a Child who has gone missing as quickly as possible. Seashell will complete a Philomena protocol form in preparation for any Child on our site who may be at risk of absconding.

## 19. 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.

## 20. Operation Encompass (Education only)

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.](#)

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## 21. Safeguarding issues (categories of abuse)

Categories of abuse vary across Children and Adult services and more details can be found here: [Appendix 5 for 2024 Specific categories of abuse and Types of discriminatory abuse](#) where types of abuse, discriminatory abuse, exploitation, radicalisation, non-recent abuse and other safeguarding issues are listed.

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 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.

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.

Critical issues to address in the body of the policy include the procedures relating to:

### Radicalisation and extremism:

- 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](mailto:counter.extremism@education.gov.uk).
- 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

- Seashell applies the statutory guidance [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#) site-wide to all services. 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 Seashell's values, the following key principles underpin Seashell's commitment to the Prevent strategy:
- **Inclusion, Tolerance, Freedom of speech, the expression of beliefs and ideology.**
- Free speech is subject to treating others with respect, understanding differences, equality, an awareness of human rights, community safety, and community cohesion.
- 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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### **Exploitation, FGM or becoming involved in serious violent crime.**

- 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.

### **22. Online Safety and Acceptable Use**

Online safety is informed by the four key categories of risk as identified in [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/keeping-children-safe-in-education-2024.pdf):

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

**The Online Safety group** has representation from IT, Governors, DDSL team, Heads of Service and parent/carers. The Online Safety group has responsibility for any online safety related issue and the monitoring and implementation of the [Online Safety and Acceptable Use Policy](#). The group are responsible for regular reporting of online safety incidents to the Designated Safeguarding Leads, the Governing Body and the Board of Trustees. Any data breach or cyber security incident is dual investigated and managed with the Data Breach Team.

**WEB filtering:** Seashell utilises multiple methods for web filtering and cloud application control to manage and monitor internet access, control what can be accessed online, and prevent exposure to inappropriate or harmful content. Filtering lists are powered by intelligence from multiple sources including proprietary research, data from global web crawlers, and AI-based dynamic real-time categorisation.

**Email Protection:** To secure our email communications, we use a cloud-based AI driven filter which inspects each email and scans for threats. This system helps detect and block spam, phishing, and malware threats, preventing them from infiltrating our network.

**Firewall:** We use a next generation firewall, with web filtering, threat defence, and advanced malware protection, protects our network from advanced threats. Its filtering capabilities are supported by one of the world's largest commercial threat intelligence teams.

#### **Filtering and monitoring:**

In line with [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/keeping-children-safe-in-education-2024.pdf), Seashell is taking robust steps to enhance its filtering and monitoring standards. A critical aspect of our approach includes routinely analysing data derived from cybersecurity tools. This data provides key insights into online behaviour, potential threats, and the effectiveness of protective measures.

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**Cybercrime:** 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](#).

### 23. Service user on service user abuse

#### Child-on-Child and Adult at risk-on-Adult at risk abuse

- In the case of a violent sexual assault or sexual harassment (for any service user), the Seashell will follow the latest procedures as set out in Part 5 of [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](#) and understand that ‘**it could happen here**’.
- 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 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](#)

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

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.

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.

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## 24. Positive behaviour support

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 following is in situ to support and safeguard:

- Regulated health and care professionals adhere to [The Health and Care Professions Council \(HCPC\) | \(hpcp-uk.org\)](#)
- [Standards for nurses - The Nursing and Midwifery Council \(nmc.org.uk\)](#)
- 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 to the National Institute for Health and Care Excellence [Violence and aggression: short-term management in mental health, health and community settings 2015 \(nice.org.uk\)](#)
- **Behaviour Support plans** will detail the collaborative and agreed behaviour support strategies for the people who use our services engaged in education and residential care services at Seashell.
- [Deprivation of Liberty orders - GOV.UK \(www.gov.uk\)](#) (Mental Capacity Act 2005) are in situ for Adult service users who live in our residential homes.
- **Individual Support plans (ISP)** 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.
- **Health Action Plan** 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.

## 25. 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:

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Active comply with [After-school clubs, community activities, and tuition - safeguarding guidance for providers \(publishing.service.gov.uk\)](#). Therefore, any incident involving a commissioned or temporary coach, trainer or instructor that is working directly with the people who use our services will be expected to comply with Seashell's safeguarding standards.

Seashell Active seeks assurance that the provider concerned has appropriate safeguarding and Child protection policies and procedures in place (including inspecting these as needed); and ensures 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.

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

## **26. 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 2024 \(publishing.service.gov.uk\)](#). Consequently, we will ensure that *all staff* (as per the definition) working within our services are suitable to do so and therefore do not pose any kind of risk to our service users. The Annual Declaration form ensures the ongoing suitability of all staff is monitored.

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.

#### **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 \(Public Interest Disclosure 'Whistleblowing'\)](#)

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General guidance on whistleblowing can be found on the [Whistleblowing for employees: What is a whistleblower - GOV.UK \(www.gov.uk\)](https://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](mailto: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 care and what protection you will have from the law: [Report a concern if you are a member of staff - Care Quality Commission \(cqc.org.uk\)](https://www.cqc.org.uk)

## 27. Safeguarding Training

### Induction:

All newly appointed staff (as per the definition) will attend a mandatory induction to:

- Understand the organisations safeguarding systems (including online safety);
- Their responsibilities to safeguard all people who use our services;
- Can identify signs of possible abuse or neglect or exploitation; and
- Know how to act upon any concerns they have.

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, FGM , and Prevent, Online Safety and whistleblowing procedures. 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).

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 \(legislation.gov.uk\)](https://www.legislation.gov.uk) or the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 [Regulations for service providers and managers - Care Quality Commission \(cqc.org.uk\)](https://www.cqc.org.uk), Safer Recruitment and allegation management.

Mandatory training for schools and college staff includes Part one [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

### 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.



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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.

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 multi-disciplinary team leads.

## 28. Legislation and Guidance

This policy is derived from a variety of legislative provisions and statutory guidance from within:

[Children Act 1989 \(legislation.gov.uk\)](http://legislation.gov.uk)

[Children Act 2004 \(legislation.gov.uk\)](http://legislation.gov.uk)

[Keeping children safe in education 2024 \(publishing.service.gov.uk\)](http://publishing.service.gov.uk)

[Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](http://publishing.service.gov.uk)

[The Children's Homes \(England\) Regulations 2015 \(legislation.gov.uk\)](http://legislation.gov.uk)

[The Care Homes Regulations 2001 \(legislation.gov.uk\)](http://legislation.gov.uk)

[The Health and Social Care Act 2008 \(Regulated Activities\) Regulations 2014 \(legislation.gov.uk\)](http://legislation.gov.uk)

[Care Act 2014 \(legislation.gov.uk\)](http://legislation.gov.uk)

[Mental Capacity Act 2005 \(legislation.gov.uk\)](http://legislation.gov.uk)

[Education and Inspections Act 2006 \(legislation.gov.uk\)](http://legislation.gov.uk)

[Children and Families Act 2014 \(legislation.gov.uk\)](http://legislation.gov.uk)

[SEND code of practice: 0 to 25 years - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

[Human Rights Act 1998 \(legislation.gov.uk\)](http://legislation.gov.uk)

[Equality Act 2010 \(legislation.gov.uk\)](http://legislation.gov.uk)

[Counter-Terrorism and Security Act 2015 \(legislation.gov.uk\)](http://legislation.gov.uk) and [Prevent duty guidance: Guidance for specified authorities in England and Wales \(publishing.service.gov.uk\)](http://publishing.service.gov.uk)

[Safeguarding-children-young-people-and-adults-at-risk-in-the-NHS-Safeguarding-accountability-and-assuran.pdf \(england.nhs.uk\)](http://england.nhs.uk)

[Data Protection Act 2018 \(legislation.gov.uk\)](http://legislation.gov.uk)

[Guide to the UK General Data Protection Regulation \(UK GDPR\) | ICO](http://ico.org.uk)

[The Caldicott Principles - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

[Female Genital Mutilation Act 2003 \(legislation.gov.uk\)](http://legislation.gov.uk) S 5B(11), as inserted by section 74 of the [Serious Crime Act 2015 \(legislation.gov.uk\)](http://legislation.gov.uk), 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 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 \(www.gov.uk\)](http://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 [The Multi Agency Policy for Safeguarding Adults At Risk in Stockport \(ctfassets.net\)](http://ctfassets.net)  
[Stockport Safeguarding Adults Partnership - Stockport Council](http://stockport.gov.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's multi agency response to need guidance document \(safeguardingchildreninstockport.org.uk\)](http://safeguardingchildreninstockport.org.uk)

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- 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.
- '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/ukpga/2015/22/section/1) 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/government/uploads/system/uploads/attachment_data/file/424117/prevent-duty-guidance-guidance-for-specified-authorities-in-england-and-wales.pdf).
- 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.

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.

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. 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 Seashell's policies and procedures referred to in 'related documents' listed below.

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## 29. 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 the people who use our services and the staff. The Head of Service for Estates and Facilities will identify and manage health and safety using 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.
- 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 parent/carers.
- To maintain effective security of the premises including protection from intruders, trespassers, and/or criminal damage.

The procedure for visitors and contractors not working directly with Children is that they will:

- Report to 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 Seashell's recruitment process and Seashell's contractor vetting and assessment process.

## 30. 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

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- 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.

### 31. 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.

The Health and Wellbeing Board, Marketing and Communications and the Family Services will support the delivery of safeguarding information to staff, the 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 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/keeping-children-safe-in-education-2024.pdf) (s.139, p.36).

### 32. 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](#) through a model of care that meets the needs of the Child and family.

In addition, Seashell is fully committed to the recommendations outlined in the [Independent Inquiry Into Child Sexual Abuse \(2022\)](#) and will continue to prioritise the protection of the 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 Seashell. Lessons will be learned from internal audits, incidents and investigations and Seashell is currently proactively engaged in reviews that align with recommendations laid out in the following:

- [Safeguarding children with disabilities in residential settings - GOV.UK \(www.gov.uk\)](#)
- Care Quality Commission published the [Out of sight – who cares? \(cqc.org.uk\)](#)
- Care Crisis Review: Options for change ([CCR-1.pdf \(frg.org.uk\)](#)) (Nuffield Foundation and Family Rights Group, 2018)
- Learning from Lives and Deaths – People with a learning disability and autistic people - [leder \(kcl.ac.uk\)](#) (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 \(england.nhs.uk\)](#)
- [Summary of the SEND review: right support, right place, right time - GOV.UK \(www.gov.uk\)](#)
- Positive Behaviour Support - [bild](#)

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### 33. Related Policies

Some, but not an exhaustive list of associated policies to consider:

Safe Administration of Medication Policy  
 Code of Conduct Policy  
 Safer Recruitment Policy  
 Health and Safety Policy  
 Positive Behaviour Support Policy  
 Lockdown Policy  
 Behaviours Framework  
 Online Safety and Acceptable Use Policy  
 Mental Capacity and Deprivation of Liberty Policy  
 Data Protection and Calicott Policy  
 Information Security Policy  
 Retention Policy  
 Fundraising Policy

### 34. Appendix

[Appendix 1 Safe at Seashell - DSL poster May 2023 \(1\).](#)  
[Appendix 2 Safeguarding procedures 2024.24.](#)  
[Appendix 3 Allegation management procedures 2024.25.](#)  
[Appendix 4 Body Map flowchart for managers.](#)  
[Appendix 4 Body Map flowchart.](#)  
[Appendix 5 for 2024 Specific categories of abuse and Types of discriminatory](#)  
[Appendix 6 Roles and Responsibilities Safeguarding policy 2024.25.](#)  
[Appendix 7 Equality Impact statement.](#)  
[Appendix 8 Low Level Concern procedural guidelines 2024](#)

<b>Revision Schedule</b>	<b>Date</b>	<b>Key Amendments</b>
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
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

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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.
Rev 16	July 2024	Sarah Ringwood. Reduced narrative, changes to definitions as per Working Together to Safeguard Children 2023 and KCSIE 2024 – specifically obligations for online safety and filtering and monitoring standards. Addition of Philomena and Online Safety requirements.

## 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.

<b>Name</b>	<b>Position</b>	<b>Organisation</b>
Chris Smales	Chair of Board of Directors	Seashell (SST)
Brandon Lee	Chief Executive	Seashell (SST)
Ben Boddice	Director of Finance	Seashell (SST)
Nikola Giles	Director of People and Workplace (DSL)	Seashell (SST)

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Bernie White	Director of Education (Dep DSL)	Seashell (SST)
Debbie Gittins	Registered Manager, Young Adults (Dep DSL)	Seashell (SST)
Garry Nelson (Interim)	Registered Manager 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 and Chair of Safeguarding Board	Seashell (SST)
Lynn Perry	Chair of Governor(s)	Seashell (SST)
Nigel Finch	Safeguarding Governor RCM	Seashell (SST)
Ged Sweeny	Safeguarding Governor RSM	Seashell (SST)
Ben Boddice	SIRO	Seashell (SST)
Colin Wilde	Cyber Security	Seashell (SST)
Richard Wilde	Online Safety Technical Lead	Seashell (SST)
Lindsey Smith	Data Protection	Seashell (SST)
Debbie Gittins, Tamsin Rowbotham	Caldicott Guardians	Seashell (SST)