

## SA-REG-01 | Mandatory Registration Document

**Safeguarding Policy***Supported Accommodation · 16 and 17 Year Olds in Local Authority Care · England***POLICY CONTROL***Complete all fields before this policy is formally adopted and issued to staff.*

<b>Organisation Name</b>	[Organisation name]	<b>Policy Reference</b>	SA-REG-01
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<b>Approved By</b>	[Approver name and role]	<b>Distribution</b>	All staff, agency workers and contractors providing services on behalf of Your Service.

**REGULATIONS AND STANDARDS**

<p><b>Primary legislation:</b> The Supported Accommodation (England) Regulations 2023 (SI 2023/416)</p> <p><b>Regulation 20:</b> Child protection policies – requires the registered person to maintain effective child protection policies covering safeguarding, allegations involving staff, online safety, self-harm and suicide prevention, and whistleblowing.</p> <p><b>Quality Standard:</b> The Protection Standard – Children feel safe and their needs are met. There is 24-hour access to help in a crisis. Child protection policies are effective and kept under review.</p>
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**Statutory guidance:** Working Together to Safeguard Children (DfE, 2023); Keeping Children Safe in Education (DfE, 2023) where applicable; Guide to the Supported Accommodation Regulations including Quality Standards (DfE, 2023).

**Related legislation:** Children Act 1989 and 2004; Children and Social Work Act 2017; Care Act 2014; Counter-Terrorism and Security Act 2015 (Prevent duty); Female Genital Mutilation Act 2003; Modern Slavery Act 2015; Equality Act 2010.

## SCOPE OF THIS POLICY

This policy sets out how the Organisation fulfils its duty to safeguard and promote the welfare of all young people living in its supported accommodation. It applies to all staff, managers, volunteers and any person acting on behalf of the Organisation in any capacity. It must be read by all staff before they begin work with young people and must be referred to in all instances where a safeguarding concern arises.

This policy has been written for supported accommodation settings providing semi-independent living for 16 and 17 year olds who are looked after by a local authority or who are care leavers. The term 'young person' is used throughout. Where legislation uses the word 'child', this is retained in direct references to legislation – all young people in this setting are legally children under the Children Act 1989.

This policy must be kept under regular review, and must be reviewed immediately following any safeguarding incident, any Ofsted inspection finding, or any change in relevant legislation or statutory guidance.

## RELATED POLICIES

- SA-REG-02 Missing Young Person Policy
- SA-REG-03 Behaviour Management Policy
- SA-REG-05 Equalities Policy
- SA-PRO-01 Recognising Abuse and Neglect
- SA-PRO-02 Child Criminal Exploitation and County Lines
- SA-PRO-03 Child Sexual Exploitation
- SA-PRO-04 Safeguarding from Radicalisation and Extremism
- SA-PRO-05 Self-Harm and Suicidal Behaviour
- SA-PRO-06 Online Safety, Social Media and Use of Technology
- SA-LM-04 Allegations Against Staff Policy
- SA-LM-05 Whistleblowing Policy
- SA-LM-06 Notification of Significant Events Policy

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- 1. Statement of Commitment**

The Organisation is committed to creating a culture of safety in which every young person is protected from harm, feels able to speak about concerns, and receives a prompt, appropriate response. Safeguarding is not a procedural exercise – it is the foundation of everything the Organisation does.

The Organisation recognises that young people aged 16 and 17 in supported accommodation are at a particularly vulnerable stage of life. Many will have experienced trauma, instability and exploitation. The Organisation acknowledges that the semi-independent nature of supported accommodation means young people spend significant time outside of staff supervision. This makes early identification of risk, strong relationships with young people, and close working with partner agencies all the more important.

The Organisation accepts that:

- Safeguarding and promoting the welfare of young people is the responsibility of every member of staff, regardless of their role;
- No single professional or organisation can protect young people in isolation – effective safeguarding depends on working in partnership with the accommodating local authority, placing authority, police, health services and other relevant agencies;
- Young people's wishes and feelings must be sought, listened to and taken seriously in all safeguarding matters;
- The welfare of the young person is paramount and must always take precedence over other considerations.

## 2. Definitions

### 2.1 Safeguarding and Child Protection

Safeguarding is a term broader than child protection. It refers to the action taken to promote the welfare of children and young people and protect them from harm. As defined in Working Together to Safeguard Children (DfE, 2023), safeguarding means:

- Protecting children from maltreatment, whether the risk of harm comes from within a family or from outside, including online;
- Preventing impairment of children's mental and physical health or development;
- Ensuring 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 safeguarding and refers specifically to activity undertaken to protect individual children and young people who are suffering, or are likely to suffer, significant harm.

## 2.2 Significant Harm

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life to protect a child. There are no absolute criteria for determining what constitutes significant harm. Consideration must be given to the severity of the harm, the extent to which it is affecting the child's health and development, and the degree to which the child's needs are being met.

## 2.3 Categories of Abuse

Working Together to Safeguard Children (DfE, 2023) defines four categories of abuse:

## 3. Roles and Responsibilities

### 3.1 All Staff

Every person working for the Organisation, in any capacity, is responsible for:

- Being alert to the signs of abuse, neglect and exploitation;
- Understanding what action to take if they have a concern about a young person;
- Attending all required safeguarding training;
- Following this policy and all related policies at all times;
- Never promising a young person that they will keep information confidential if it relates to their safety or the safety of others;
- Reporting any concern promptly – it is not the role of an individual staff member to investigate or make a judgement about whether abuse has occurred. The role of staff is to report.

### 3.2 Designated Safeguarding Lead (DSL)

The Organisation must appoint a Designated Safeguarding Lead (DSL) who carries overall responsibility for safeguarding within the service. The DSL must:

- Be a senior member of staff with appropriate authority to make decisions and take action;
- Hold or be working towards recognised safeguarding training at least at Level 3 or equivalent;
- Refresh their safeguarding training every two years at minimum;
- Be available to staff for advice and support on safeguarding matters at all times during working hours, with a clear arrangement for out-of-hours contact;
- Maintain detailed, accurate and confidential records of all safeguarding concerns and referrals;
- Make referrals to the local authority children's services or the police where appropriate, without delay;
- Work collaboratively with the accommodating local authority and placing authority on

safeguarding matters;

- Ensure the effectiveness of child protection policies is kept under review;
- Report to the Registered Service Manager and Nominated Individual on safeguarding activity and trends.

The name and contact details of the DSL must be clearly displayed in the accommodation and must be known to all young people.

### **3.3 Deputy Designated Safeguarding Lead**

A deputy DSL must be appointed to act in the absence of the DSL. The deputy must receive the same level of training as the DSL and must be prepared to fulfil all DSL functions when needed.

### **3.4 Registered Service Manager**

The Registered Service Manager is responsible for:

- Ensuring that this policy is implemented consistently across all premises and by all staff;
- Ensuring that the DSL role is always covered and that staff know how to access safeguarding support out of hours;
- Notifying Ofsted of any serious safeguarding incidents without delay, in accordance with Regulation 30;
- Overseeing the Organisation's response to allegations against staff in their role as the Organisation's senior manager;
- Ensuring that all staff complete safeguarding training appropriate to their role;
- Maintaining oversight of all safeguarding referrals and their outcomes.

### **3.5 Nominated Individual**

The Nominated Individual (the director or equivalent responsible person registered with Ofsted) must:

- Ensure that the Organisation has sufficient resources and systems in place to meet its safeguarding obligations;
- Provide strategic leadership and oversight of safeguarding culture and practice across the Organisation;
- Liaise with Ofsted as required regarding safeguarding matters, including Prevent referrals;
- Ensure that the DSL and Registered Service Manager are supported in carrying out their safeguarding responsibilities.

## **4. Recognising Abuse, Neglect and Harm**

Staff in supported accommodation must be skilled at recognising the signs and indicators that a

young person may be at risk of harm or may be being abused. Because young people in this setting have a higher level of independence, some forms of harm – particularly exploitation – may be less visible and require greater awareness and proactive practice.

#### 4.1 Signs and Indicators of Concern

The following are examples of indicators that a young person may be experiencing abuse, neglect or harm. This list is not exhaustive. Staff should trust their professional judgement and report any concern, however small.

- Unexplained injuries, bruising, burns or marks;
- Changes in behaviour, mood or emotional state – becoming withdrawn, anxious, angry or fearful;
- Signs of distress that the young person is reluctant to explain;
- Evidence or disclosure of physical, sexual or emotional abuse;
- Neglect of personal hygiene, nutrition or health – or the young person not accessing food, clean clothing or medical care;
- The young person going missing, returning late, or spending time with unknown adults;
- The young person having unexplained gifts, money, new clothing or phones;
- Signs of grooming – an older person taking a particular interest in the young person, buying them gifts, or appearing to have control over them;
- The young person appearing frightened, submissive or controlled by others;
- Evidence of drug or alcohol use, or being under the influence of substances;
- The young person making disclosures – directly or indirectly – about harm or abuse;
- Signs of self-harm or suicidal ideation;
- Indicators of child sexual exploitation (CSE) or child criminal exploitation (CCE) – see Section 5.

#### 4.2 Responding to a Disclosure

If a young person makes a disclosure of abuse or harm – or if staff observe indicators of concern – the following principles apply:

- Listen carefully and calmly. Do not show shock, disbelief or distress;
- Believe what the young person tells you – do not question whether they are telling the truth;
- Do not ask leading questions or press for details. Use open questions if clarification is needed ("can you tell me more?");
- Do not promise confidentiality – be honest that you will need to share the information to keep them safe;
- Reassure the young person that they have done the right thing by speaking up;
- Record what was said as soon as possible, using the young person's own words;
- Report to the DSL immediately – do not delay, even if you are unsure whether it constitutes a formal concern.

**Important:** It is not the responsibility of any member of staff to investigate a safeguarding concern. The role of staff is to observe, listen, record and report. Attempting to investigate could compromise a formal investigation and put the young person at greater risk.

## 5. Specific Forms of Harm

Young people in supported accommodation are particularly vulnerable to a range of specific forms of harm. Staff must be trained in recognising and responding to each of the following.

### 5.1 Child Sexual Exploitation (CSE)

CSE involves the manipulation and coercion of a young person into sexual activity in exchange for something they want or need, such as affection, accommodation, money, gifts or drugs. In some cases the young person may not recognise they are being exploited. Key indicators include:

- Older boyfriends or girlfriends;
- Unexplained gifts, money or new possessions;
- Frequent absences from the accommodation or going missing;
- Returning late at night;
- Secretive use of mobile phones;
- Evidence of sexual activity, STIs, pregnancy;
- Emotional withdrawal, low self-esteem or self-harm.

See also SA-PRO-03 Child Sexual Exploitation Policy.

### 5.2 Child Criminal Exploitation (CCE) and County Lines

CCE occurs when a young person is manipulated, coerced or deceived into carrying out criminal activity for another person or group. County Lines refers specifically to criminal networks using young people to transport drugs across county or regional borders. Indicators include:

- Carrying drugs, weapons or unexplained amounts of cash;
- Using multiple mobile phones or SIM cards;
- Unexplained absences or travel – particularly overnight;
- Unexplained injuries consistent with assault;
- Association with older individuals involved in crime;
- Receiving unexplained money or goods.

See also SA-PRO-02 Child Criminal Exploitation and County Lines Policy.

### 5.3 Radicalisation and Extremism

The Organisation has a duty under the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). Signs that a young person may be at risk of radicalisation include:

- Expressing extremist views or sympathy for terrorist groups;
- Becoming increasingly withdrawn from family and friends;
- Viewing, possessing or sharing extremist material online;
- Expressing the intent to travel to a conflict zone.

Any concern about radicalisation must be reported to the DSL immediately. The DSL will consider whether a referral to the Channel programme is appropriate. See also SA-PRO-04 Safeguarding from Radicalisation and Extremism Policy.

#### **5.4 Honour-Based Abuse and Forced Marriage**

Honour-based abuse includes practices used to punish a person who is believed to have brought shame on their family or community. This may include forced marriage, physical violence or emotional abuse. Female Genital Mutilation (FGM) is a form of honour-based abuse and is a criminal offence under the Female Genital Mutilation Act 2003. Mandatory reporting of known cases of FGM on girls under 18 to the police is a legal obligation. Any concern relating to honour-based abuse or FGM must be reported to the DSL immediately.

#### **5.5 Domestic Abuse**

Young people in supported accommodation may be in relationships where there is domestic abuse, or may have experienced domestic abuse within their family prior to coming into care. Staff must be alert to signs including controlling behaviour, jealousy, coercion, unexplained injuries and the young person being fearful of their partner. The Domestic Abuse Act 2021 recognises children as victims of domestic abuse in their own right.

#### **5.6 Modern Slavery and Human Trafficking**

Young people may be victims of trafficking or modern slavery, particularly in the context of CCE or CSE. Indicators include a young person not knowing their address or being unfamiliar with the area, appearing frightened or under the control of another person, not being free to move around, or showing signs of physical abuse. Any concern must be reported to the DSL who will consider a referral to the National Referral Mechanism (NRM).

#### **5.7 Online Harm**

Young people in supported accommodation have significant online activity and access. Online harm

includes cyberbullying, grooming, exposure to harmful content, sexual exploitation facilitated online, and radicalisation. See SA-PRO-06 Online Safety Policy for full details.

## 5.8 Self-Harm and Suicidal Behaviour

Self-harm and suicidal ideation are safeguarding concerns. Staff must know how to respond calmly, without judgement, and must refer to the DSL immediately. See SA-PRO-05 Self-Harm and Suicidal Behaviour Policy for full guidance.

## 6. Referring a Safeguarding Concern

### 6.1 Internal Reporting

Any member of staff who has a safeguarding concern – however small or uncertain – must report it to the DSL without delay. They must not:

- Wait to see if the situation resolves itself;
- Discuss the concern informally with colleagues before reporting;
- Attempt to investigate independently;
- Allow concerns about appearing to 'overreact' to prevent reporting.

The DSL will assess all concerns and decide on the appropriate course of action.

### 6.2 Referral to Children's Services

Where the DSL believes that a young person may be at risk of significant harm, a referral must be made to:

- The children's services department of the local authority where the accommodation is located (the accommodating authority); and
- The placing authority (the local authority with parental responsibility or responsibility for the young person's care), where this is different.

Referrals should ordinarily be made in writing to children's services within 24 hours of the concern arising. In cases of immediate risk of harm, referral should be made by telephone immediately, followed up in writing.

If, in an exceptional case, the DSL decides not to make a referral, the reasons for that decision must be recorded in full. If any member of staff disagrees with a decision not to refer, they have the right and duty to refer directly to children's services themselves.

### 6.3 Referral to Police

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