NEW HORIZON YOUTH CENTRE – SAFEGUARDING POLICY

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Person responsible for this policy	Meghan Roach, Chief Operating Officer
Signature	
Authority to review and approve policy	Audit and Risk Committee on behalf of and reporting to the Board of Trustees
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1. Introduction

This policy outlines our approach to safeguarding children and adults at risk (for the purposes of this policy, children are under the age of 18 and adults are 18-24 years old). The definition of an adult at risk is a person who is or 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 themselves, or unable to protect themselves against significant harm or exploitation.

We may at times in this policy refer to the children and adults we work with collectively as "young people". This policy is written in accordance with the Children Act 2014 and the Safeguarding Vulnerable Groups Act 2006 and with reference to Working together to Safeguard Children (2018)

It will be reviewed, added to, or modified from time to time and may be supplemented in appropriate cases by further statements related to the work of New Horizon Youth Centre (known as NHYC from now on). Copies and subsequent amendments will be made available to all employees.

The success of this policy depends on the active support of all employees to achieve its objectives.

NHYC recognises the need for a well-defined policy setting out the standards it aims to achieve for safeguarding the young people within our care. This Safeguarding Policy sets out the arrangements for achieving this aim including the detailed responsibilities for key staff.

This policy should be read in conjunction with other key NHYC policies, including but not limited to:

- Data Governance policy
- Inclusion policy
- Lone Working policy
- Health and Safety policy
- ICT policy
- Whistleblowing policy
- NHYC Protocol for Reporting to the Charity Commission
- Equity, Diversity and Inclusion policy
- Staff Wellbeing Policy
- Harassment and Bullying Policy
- Inclusion Policy

All policies can be found here on SharePoint: 3. Policies

2. Designated Safeguarding Officer(s)

NHYC Designated Safeguarding Officers are:

Kai Neckles, Head of Safeguarding (Designated Safeguarding Lead):
kai.neckles@nhyouthcentre.org.uk - 0207 388 5560

Viviane DaSilva, Services Manager (Youth Justice) (Deputy):
viviane.dasilva@nhyouthcentre.org.uk

Claire Kew, Head of Services – Housing (Deputy): claire.kew@nhyouthcentre.org.uk

Chelsie Sparks, Head of Services – Youth Work (Deputy):
Chelsie.sparks@nhyouthcentre.org.uk

3. NHYC Safeguarding Policy Statement

NHYC believes that it is always unacceptable for a child, young person or adult to experience abuse of any kind. We recognise our responsibility to safeguard the welfare of all children, young people and adults by a commitment to practice, which protects them.

We recognise that:

- The welfare of the child, young person or adult is paramount
- All children, young people and adults regardless of age, disability, sex, gender reassignment or identity, racial heritage, religious belief or lack thereof, sexual orientation or identity, relationship or marital status, if they have dependants, children or their pregnancy or maternity status have the right to equal protection from all types of harm or abuse
- Working in partnership with children, young people, their parents, carers and network is essential in promoting young people's welfare
- All our staff and volunteers need to be carefully selected and trained and accept responsibility for safeguarding the children, young people and adults at risk they come into contact with

The purpose of the policy is to:

- Provide protection for the children, young people and adults at risk who receive NHYC services
- Provide staff and volunteers with guidance on procedures they should adopt in the event that they identify a potential safeguarding concern

This policy is mandatory for anybody working for or on behalf of NHYC, meaning all paid staff, locums, volunteers, students, the Board of Trustees, and contracted staff or partner agencies. The policy must be applied whenever there is a concern about a young person or about the behaviour of an adult towards a child or young person.

We will endeavour to safeguard children, young people and adults at risk by:

- Valuing them, listening to and respecting them
- Embedding child protection guidelines within our internal procedures, including our code of conduct for staff and volunteers
- Conducting robust recruitment and selection processes including thorough interviews, professional references, employee declarations and DBS checks
- Sharing safeguarding best practice with relevant stakeholders
- Reporting to Social Services and relevant supervisory authorities any suspicion that a child, young person or adult has suffered, is suffering, or is at risk of suffering abuse
- Providing effective management for staff and volunteers through supervision, support, training and reflective practice.

This Policy will be reviewed when needed or at least annually.

4. Organisation and Responsibilities

4.1 Trustees

The Charity Commission is clear that Trustees have primary responsibility for safeguarding in their charity. In fulfilling their duty of care to NHYC, trustees need to take steps to safeguard and take responsibility for the children and young people with whom NHYC works.

This means:

- Acting in their best interests
- Taking all reasonable steps to prevent any harm to them
- Assessing and managing risk
- Putting safeguarding policies and procedures in place
- Undertaking ongoing monitoring and reviewing to ensure that safeguards are being implemented and are effective
- Responding appropriately to allegations of abuse

Within NHYC, we have a dedicated Safeguarding Trustee who will meet regularly with the Designated Safeguarding Lead, the Chair of the Board and the Chair of the Audit and Risk Committee to discuss any significant safeguarding matters. The Audit and Risk Committee meets at least three times a year. The Safeguarding Trustee and Chair of the Audit and Risk Committee are responsible for ensuring the Charity Commission is informed of any serious incidents in a timely manner.

4.2 Chief Executive

The Chief Executive is responsible for:

- The implementation, maintenance, monitoring and review of this Policy, across NHYC
- Leading by example in actively promoting safeguarding practices in NHYC
- Where required, making a report to the Charity Commission

4.3 Leadership Team

The Leadership Team are responsible for:

- Working with the Chief Executive to maintain this policy through planning, implementing, measuring and reviewing performance
- Ensuring the teams they manage have implemented the Safeguarding Policy and have received the appropriate safeguarding training
- Coordinating responses to any serious safeguarding incidents.

4.4 Line Managers

Other line managers are the key to the success of this policy. They are accountable for the safeguarding standards within their area of control. Specifically, they are responsible for:

- Ensuring the Safeguarding policy is communicated and implemented within their area of control

- Making sure they and their staff understand the safeguarding arrangements within NHYC
- Inducting, instructing, training and supervising employees, volunteers and students
- Ensuring all incidents relating to safeguarding are reported to a Designated Safeguarding Officer
- Reporting safeguarding issues which they cannot resolve to the Leadership Team.

4.5 All Employees

All employees are responsible for:

- Making sure they understand the part they play regarding safeguarding children and young people
- Co-operating with managers in following the safeguarding arrangements set out in this policy
- Reporting any potential safeguarding concerns to a Designated Safeguarding Officer
- Reporting any concerns about the behaviour of any members of staff, volunteers, students, or contractors towards children or young people to a Senior Manager or Designated Safeguarding Officer

4.6 Designated Safeguarding Lead

The Designated Safeguarding Lead is responsible for:

- Providing safeguarding advice to all areas of NHYC
- Monitoring the implementation of this policy across NHYC and reporting any concerns to the Chief Executive and Leadership Team
- Reporting to the trustees via the Audit and Risk Committee any relevant matters relating to safeguarding

4.7 Director of Operations

The Director of Operations is responsible for:

- Informing the Trustee with responsibility for Safeguarding of any referrals to the DBS
- Keeping records of concerns raised against a member of staff or volunteer on their staff file
- Making a referral to the LADO and DBS
- Where required, making a report to the Charity Commission.

4.8 Designated Safeguarding Officers

The Designated Safeguarding Officers are responsible for:

- Responding in a timely manner to any potential safeguarding concerns
- Keeping written records in line with our Data Governance Policy
- Referring a case on to other agencies where necessary
- Ensuring our safeguarding procedures are compliant with policy and reflect best practice

- Sharing learning across the organisation

4.9 Working in Partnership

NHYC will cooperate and coordinate with all organisations it works in partnership with to safeguard young people. This includes carrying out appropriate due diligence before bringing on board new operational, funding or strategic partners, inducting operational partners into our safeguarding procedures, and regular reviews of partnerships and any risks associated with them. Further detail can be found in section 5.7 of this policy.

5. General Arrangements for Implementing the Safeguarding Policy

5.1 Safer Recruitment

Safeguarding the children and young people who NHYC have contact with is considered at the recruitment stage. All staff, volunteers, students and trustees are required to attend interviews and provide references, as detailed in the NHYC's recruitment, selection and induction procedures.

A Disclosure and Barring Service (DBS) check will also be obtained for all staff, volunteers and trustees, regardless of the position they are recruited to. The level of DBS check will vary depending on the person's role. DBS checks are organised prior to new starters commencing their roles, and individuals are not permitted to lone work with young people before their full DBS is returned and approved by NHYC. Students on voluntary placements at NHYC are not DBS checked by NHYC but we ask all to provide evidence of a recent police check or DBS-equivalent in their home country before starting. Further risk assessments are completed where necessary. Students are closely supervised during all activities and are not permitted to lone work with young people.

During interviews, all candidates are questioned regarding their understanding of safeguarding and how this relates to safely carrying out the role they are applying for. Safeguarding forms a key part of the induction process, detailed further in Section 5.5 of this policy.

5.2 Safer Working

All staff and volunteers working for NHYC have a responsibility to safeguard the young people that they are working with to ensure their physical, sexual and emotional safety. Staff should always aim to treat everyone with respect and ensure their own behaviour is appropriate at all times. Further information and policies around appropriate conduct are available from NHYC and will be shared with all new starters during their first week in role.

<u>Good Practice Guidelines for working with young people:</u>

- Plan activities thoroughly, including staffing ratios, delivery locations, resource requirements and expected attendees.
- Aim to deliver activities with other members of staff present or at least in sight or hearing of others. Avoid unnecessary lone working situations with young people and ensure other staff are aware of your location and the purpose of any meeting or activity when lone working.

- When responding to concerns, don't exaggerate or trivialise safeguarding issues. Ensure young people aren't deterred from raising concerns through fear of not being believed.
- Address, record and escalate any potential safeguarding concerns.
- Don't engage in or permit abusive behaviour between young people e.g. ridiculing or bullying, or allow yourself to be drawn into inappropriate conversations
- Don't engage in sexually provocative or rough physical games with young people
- Don't make suggestive remarks or gestures or tell jokes of a sexually inappropriate or discriminatory nature
- Don't show favouritism to any individual
- Don't give young people your personal contact details and do not communicate with them outside of the work you are doing with them

Physical Contact:

Staff and volunteers should not have unnecessary physical contact with young people. There may however be occasions when physical contact is unavoidable or positively necessary for safety reasons, for example

- Administering first aid
- Providing assistance to a person with a disability who requests such assistance
- Giving direct assistance when fitting outdoor activity equipment, e.g. a harness
- Lifeguarding

Wherever possible there should be an attempt to ask the person to agree to such contact. Where appropriate, staff should explain their actions. This should be conducted openly and ideally, with another member of staff or volunteer present. Staff should be aware of their positioning so that, where possible, others can clearly see the assistance being given.

Staff and volunteers should avoid doing things of a personal nature that the person can do themselves. However, when working with people with physical disabilities, personal care and help is sometimes required.

It is the policy of NHYC that staff, volunteers and students should never restrain a young person participating in one of our programmes. In very rare circumstances there may be a need to physically restrain a young person for their own or other's safety. See Appendix D for further guidance about restraint.

Social Media:

Online abuse is increasingly common among the young people we work with. Social media and the internet more broadly, are often used as means of grooming children and young people, or as vehicles for peer-on-peer abuse. Staff and volunteers might also find their safety compromised if their personal information is readily available online.

In order to safeguard NHYC staff and those we work with, staff and volunteers must never use any personal social media accounts in communication with young people. They should also be mindful of their privacy settings to avoid situations where their personal information is easily accessible online. Best practice guidance is to set all personal social media accounts to "private".

Photography:

Photographs of young people taking part in NHYC activities are a valuable way to promote NHYC. However, images can identify children and young people, putting their safety and privacy at risk, and may also be altered for inappropriate use. To manage these risks, all employees must follow our Data Governance Policy by ensuring images are stored securely, access is appropriately controlled, and young people have given informed consent. NHYC does not use images of children externally. Any external use of young people's images must be carefully managed by the Campaigns, Impact and Partnerships team in line with our Contact with the Media policy.

External Events:

External and fundraising events are a valuable part of NHYC's work, and young people supported by NHYC may be invited to take part. Their involvement helps demonstrate the impact of NHYC's work, but their safety and wellbeing must remain the priority. Before attending, young people will be briefed on what to expect, and NHYC's safeguarding procedures will be used to identify and manage any risks or concerns, including:

- Completing suitable risk assessments for each young person
- Ensuring a DSO is available to respond to any concerns
- Assigning a staff chaperone as the main contact throughout the event
- Completing a follow-up and wellbeing check after the event

Residential Trips:

When organising residential trips for young people, NHYC staff must follow specific safety protocol detailed below. Further information can also be found in the National Youth Agency, Residential Venues guidance document.

Basic protocol includes, but is not limited to:

- A minimum of two staff should attend any residential trips. More staff or volunteers can be added depending on the overall group size. The Limiting Numbers Protocol sets a staffing ratio of one staff member to every 10 young people when opening the day centre. For residential settings, this ratio is doubled to one staff member to every five young people.
- Staff must not share a bedroom with a child or young person.
- Bedrooms of only two young people should be avoided
- Bedrooms should not be mixed male and female. The exception to this may be where there are young people who identify as trans or non-binary.
- Adults and young people must use separate and private shower facilities

5.3 Responding to Safeguarding Concerns:

Staff and volunteers may identify safeguarding concerns for young people in a number of ways:

- A young person may disclose that they or someone else has been or is at risk of being abused
- Through observation of a young person's behaviour and/or presentation
- Through observation of another professional's behaviour towards young people
- A parent, carer, relative or member of the public might share their concerns about a young person they have a relationship with
- An external partner/professional might share their concerns about a young person known to both services, or the conduct of another professional

In all cases, the following procedures must be followed.

Receiving disclosures from young people:

- Stay calm and listen carefully to them – reassure them that you are taking what they are saying seriously
- Encourage them to talk, but do not interrupt whilst they are recalling events
- Ask questions only to clarify your understanding of what you are being told. Do not investigate. Do not ask them to repeat their account unnecessarily.
- Do not promise to keep the information secret. Explain that you have to pass the information on to a manager and/or Designated Safeguarding Officer. Tell the young person what you are going to do next.
- Do not confront any alleged perpetrator of abuse.
- Do not dismiss or minimise their account, or attempt to alter, change or add to their account with your own words.
- As soon as you can, write down what the young person has said, using their own words
- Report to your Designated Safeguarding Officer as soon as you can, and definitely before the end of the working day.

Reporting a young person's disclosure of abuse is not a betrayal of the young person's confidence. It is your duty and is also necessary to allow protective action to be taken in relation to the young person and anyone else who might be at risk.

If you feel a young person may be about to tell you about abuse, but then stops or tells you something else, let them know that you are always ready to listen to them and when NHYC is available for them to contact. You may also wish to signpost them to external services such as ChildLine or the Samaritans, where appropriate and relevant.

If the young person has communication difficulties or English is not their first language, explore using our approved interpreting service.

Observations:

If you become concerned about a young person (due to their behaviour, presentation or something else you observe)

- Do not trivialise or dismiss your concerns
- If the behaviour may be harmful to other young people, do not explain it away as 'normal'
- Report your concerns to your line manager and/or Designated Safeguarding Officer as soon as you can, and definitely before the end of your working day. If you are working out of hours or from home, you must still report your concern to

your line manager, Designated Safeguarding Officer or the Director of Operations.

Information that may seem trivial can frequently form the missing piece of the puzzle and lead to protective action being taken.

Concerns about other professionals:

If you become concerned about the behaviour of another professional (internal or external) towards children, young people or adults at risk:

- Do not dismiss your concerns
- Do not confront the person about whom you have concerns or try to carry out your own investigation
- Do report your concerns to the Designated Safeguarding Lead or Director of Operations as soon as you can, and definitely before the end of your working day.

It is **VERY IMPORTANT** you do not ignore or dismiss suspicions about another professional or colleague, however well or little you know them, or whatever position they may occupy in their organisation.

If your concerns are about the Designated Safeguarding Lead or Director of Operations, then you should speak to the Chief Executive. If your concerns are about the Chief Executive, you should speak to the Director of Operations or a member of the Board of Trustees.

Your concerns will be investigated sensitively and even if they are not upheld, you will not suffer any adverse consequences for raising the concern. The only exception to this would be where it could be conclusively shown that the concerns were raised maliciously.

Concerns raised by parents, carers, members of the public or external professionals:

- Do not leave it to them to make their own referral to social care services.
- Take adequate details about their concern and the identity of the young person
- Report your concerns to your Designated Safeguarding Officer as soon as you can, and definitely before the end of the working day. Agree next steps with them, which may include making a referral to social care services.

Concerns raised by members of the public should always be taken seriously and where necessary NHYC should take responsibility to make the referral to social care services.

If you are dissatisfied with the response to any of your concerns above, raise these again with your Designated Safeguarding Officer. If you are unable or unwilling to do this, you can approach another Designated Safeguarding Officer or the Operations Director or the Chief Executive.

5.4 Responding to Serious Incidents

The NHYC Leadership Team hold a procedure for responding to what may be defined as “serious incidents”. Typically, this might include major physical altercations between young people, assaults on staff, serious threats of violence to young people and/or staff, or risks posed by major events in society. In such situations, members of the

Leadership Team will be allocated (by the Director of Operations and/or Chief Executive) to investigate such incidents and decide on appropriate courses of action. This will at times overlap with our Inclusion Policy for young people, or relevant HR policies.

Certain safeguarding concerns or serious incidents may meet the threshold to be reported externally to The Charity Commission. The Commission must receive a report detailing what happened and how the incident is being dealt with, even if it has also been reported it to the police, donors or another regulator. Further information about the threshold and process for reporting can be found in the *NHYC Protocol for Reporting to The Charity Commission* document. Examples might include, but are not limited to:

- A young person has suffered serious harm and been hospitalised as a result of an insufficient risk assessment by NHYC staff during an activity
- A young person has alleged sexual assault from a staff member whilst under NHYC care
- A young person is fatally injured
- A staff computer or mobile device is found to contain indecent images of children or young people

Whether an incident meets the threshold must be discussed and agreed between the Designated Safeguarding Lead and/or Operations Director, Chief Executive and relevant Trustees.

5.5 Designated Person

NHYC have appointed Designated Safeguarding Officers who are trained to respond to safeguarding concerns. There will be at least one Designated Safeguarding Officer available every day that we are open. Staff who have safeguarding concerns must raise these with a Designated Safeguarding Officer initially (including in conjunction with their line manager) and then discuss whether a referral to an external agency is required. Staff should not hesitate in making a direct referral to an external agency if the Designated Safeguarding Officer is unavailable for any reason. It is not the role of staff to investigate concerns themselves. This is the role of statutory services.

Multiple referrals to external agencies may be made regarding the same child, young person or adult risk. Staff should not avoid raising multiple concerns where the concern is considered to be ongoing. All concerns and reports should be recorded.

5.6 Training

All NHYC staff, volunteers, students and trustees will be given appropriate safeguarding training. Staff are required to complete online Introduction to Safeguarding training within the first month of their employment. Staff must then attend full Safeguarding training within the first six months of their employment. This will be delivered in-house by the Designated Safeguarding Officers. In rare cases when training cannot be scheduled in-house, staff should attend sessions delivered by one of NHYC's recommended training partners.

Staff must attend refresher training at least once every two years. This will be supplemented by other relevant training courses around topics such as conflict management, mental health or escalation routes.

Volunteers will be given safeguarding training relevant to the position in which they are volunteering. For one-off volunteers, this could be their supervisor talking through the NHYC Safeguarding Policy. For regular volunteers, this must include attending the NHYC in-house training.

Trustees will be required to complete online Safeguarding for Trustees training, typically delivered by the NSPCC or a similar organisation.

5.7 Working with Partner Agencies

Working with external partner agencies is a key part of our work. It is important in these circumstances that there is clarity of responsibility for different aspects of safeguarding between the two parties.

It should be clear in the partnership agreement which organisation has responsibility for safeguarding young people. NHYC remain responsible for risk assessing any activities that we ourselves are delivering or leading, and must also remain alert to any indications that a young person might be at risk during an activity led by an external partner. Such concerns should be reported in the usual way to your line manager and/or Designated Safeguarding Officer.

Should NHYC become aware of safeguarding issues or malpractice at another organisation, the Designated Safeguarding Officers will take appropriate action which may include discussion with a Designated Safeguarding Officer in a partner organisation and/or reporting to an outside supervisory agency.

In situations where safeguarding risks remain unresolved within activities led by an external partner, NHYC may have no option but to terminate their partnership agreement.

5.8 Concerns about the behaviour of a member of staff, volunteer or student

These procedures should be used in respect of all cases where it is alleged that a person who works with children, young people or adults at risk has:

- Behaved in a way that has or may have harmed a child, young person or adult at risk
- Possibly committed a criminal offence against or related to a child, young person or adult at risk
- Behaved in such a way that indicates that they may be unsuitable to work with children, young people or adults at risk.

Even if the concern is not connected to the person's employment or work activity, these procedures may still apply.

It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. All allegations must be investigated as a priority to avoid any delay. The time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation.

There may be up to three strands in the consideration of an allegation:

- A police investigation of a possible criminal offence
- Enquiries and assessment by social services about whether an individual child, is in need of protection or in need of services
- Consideration by an employer or regulatory body of action in respect of the individual

If there is an immediate risk, appropriate actions may need to be taken e.g. urgent involvement of police; suspension of member of staff and removal from NHYC premises; securing evidence; urgent medical attention.

Any allegation or concern which arises should be reported immediately to the Director of Operations or in their absence, the Chief Executive or Designated Safeguarding Lead. They will assess what next steps need to be taken, which may include following procedures set out in the Disciplinary Policy or reporting the concern to a relevant external agency as detailed below.

Where a member of staff receives an allegation against someone from another organisation, this should also be reported to the Designated Safeguarding Lead or Director of Operations. Details of allegations must be kept confidential and shared only with the Designated Lead or Director of Operations dealing with any investigation.

If it is alleged that a staff or volunteer working with children has done any of the following, the case must be referred by the Designated Safeguarding Lead or Director of Operations to the Local Authority Designated Officer (LADO) using the LADO agency reporting form. The relevant LADO for New Horizon is within the Camden Safeguarding Children Partnership.

- behaved in a way that has harmed or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child/ren in a way that indicated s/he is unsuitable to work with children

Some cases may also reach the threshold to require reporting to The Charity Commission. Please refer to the NHYC Charity Commission reporting guidance. Reports should be sent by either the Designated Safeguarding Lead, Director of Operations or Chief Executive. The safeguarding lead on the Board of Trustees must be made aware of all referrals.

6. Confidential Information and Retaining Records

Young people are entitled to their privacy. However, where there are concerns about their safety or welfare, those concerns and the necessary personal information will need to be shared with those who can make decisions about action to safeguard the young person.

There is nothing in any legislation that prohibits the sharing of confidential and personal information where there are concerns about the safety or welfare of a child, young person or adult at risk, or where a criminal act may be, or may have been committed.

Employees should make written notes at the earliest opportunity and these should be passed to the Designated Safeguarding Officer either via email or by creating a new safeguarding alert on the client database (InForm). The Designated Safeguarding

Officers must keep all written documents relating to a safeguarding issue in a secure place. There is a secure folder on the server for all electronic documents, accessible only to Designated Safeguarding Officers, the Director of Operations and Chief Executive. This is in addition to the overview record that will be maintained on InForm.

Safeguarding records should be kept until NHYC is confident that the information is held accurately with the agency responsible for taking further action to safeguard the child, young person or adult at risk i.e. partner agencies, social services or the police. A chronology of decisions made and actions taken can then be kept on file once the detailed records are deleted or destroyed. This record should be held until the child or young person is 25 or for six years after they last engaged with the service, whichever is longer.

More information can be found in the NSPCC document Child Protection Records Retention Storage Guidance

Records that relate to concerns raised about a member of staff or volunteer (including allegations or behaviour that has harmed or may have harmed a child, young person or adult at risk), must meet the following guidance:

- Evidence that the Director of Operations, Chief Executive or Designated Safeguarding Lead has been informed
- A clear and comprehensive summary of any allegations made, details of how the allegations were followed up and resolved, and of any action taken and decisions reached, will be recorded
- The record to be kept in the person's confidential personnel file and a copy given to the individual
- Information will be retained on file until the staff member or volunteer reaches normal retirement age or for 10 years, whichever is longer.
- Records should still be kept even if allegations were unfounded.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where a future DBS disclosure reveals information from the police that an allegation was made but did not result in a prosecution or a conviction. It will also prevent unnecessary re-investigation if, as sometimes happens, allegations resurface after a period of time.

NHYC have a duty to refer to the DBS any employees or volunteers who have been dismissed, redeployed, retired/redundant or resigned where NHYC believe that this person has either:

- Engaged in relevant conduct or
- Satisfied the harm test or
- Received a caution for, or been convicted of, a relevant offence (As defined in the Safeguarding Vulnerable Groups Act 2006).

The Director of Operations (or, in their absence, the HR Advisor) is responsible for making this referral to DBS and for informing the Trustee with responsibility for Safeguarding.

APPENDIX A – Recognising Signs and Symptoms of Abuse

Definitions of Abuse

"Child abuse and neglect" is a generic term encompassing all ill treatment of children including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the child's health or development. Children may be abused or neglected through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child. *Working Together to Safeguard Children (2018)* sets out definitions and examples of the four main categories of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

These categories can overlap and an abused child frequently suffers more than one type of abuse.

Physical Abuse

Physical abuse may involve poking, pushing, hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child. It can also include "fabricated" or "induced" illness where a parent or carer simulates the symptoms of, or deliberately causes, ill health in a child.

Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent effects on the child's emotional development. This may involve

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capacity, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Serious bullying, causing children frequently to feel frightened or in danger - e.g. witnessing domestic violence
- Exploitation or corruption of children

Some level of emotional abuse is involved in most types of ill treatment of children, though emotional abuse may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening and includes penetrative and non-penetrative acts. It may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways. Sexual abuse includes abuse of children through sexual exploitation.

Sexually Harmful Behaviour

A significant proportion of sexual abuse is carried out by children and young people on their peers. Such abuse should always be taken as seriously as that perpetrated by an adult. The behaviour should not be dismissed as "normal". A referral to social services should always be made.

Abuse of Trust

All members of staff and volunteers with NHYC have a relationship of trust with the children and young people who use our services. It is an abuse of that trust and could be a criminal offence to engage in any sexual activity with a young person aged under 18, or a vulnerable young person under the age of 25, irrespective of the age of consent and even if the relationship is consensual.

Organised Abuse

This is sexual abuse where there is more than a single abuser and the adults concerned appear to act in agreement to abuse children and/or where an adult uses an institutional framework or position of authority to recruit children for sexual abuse.

Child Sexual Exploitation (CSE)

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Neglect

Neglect involves the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health and development. This may involve failure to provide adequate food, shelter or clothing, failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also include neglect of a child's basic emotional needs.

Recognising Signs of Abuse

Recognising possible abuse is a complex and complicated procedure and it is not the responsibility of NHYC employees to decide whether a child or young person has been abused or is at risk. However, there is a responsibility to act on any concerns and report them to a Designated Person. The following information is designed as a guide to help raise awareness of the different signs of abuse.

Physical Abuse

Most children collect accidental injuries and bruises from time to time, and bruises caused in this way are likely to be on the external bony parts of the body such as the knees, shins, elbows and forehead. Most children who have developed language skills will be able to describe how an injury was caused. Any injury should be considered in the context of the child's history and developmental stage, and any explanation given.

The following circumstances are possible indicators of physical abuse and should trigger concerns:

- Delay in the presentation of the injury
- An injury which is not consistent with the explanation given
- Changing or differing accounts of how the injury occurred
- An unexplained injury

Types of bruising which may indicate physical abuse include:

- Bruising in babies and young children who are not independently mobile
- Bruising to the soft tissue area where there is no bony prominence, e.g. face, back, arms, buttocks, genitalia, ears and hands
- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, for example of an implement, a hand or a cord
- Grip marks; in a young baby this could indicate that the child has been shaken, risking injury to the brain
- Frequent bruising for which the child is unwilling to offer an explanation
- Regular "accidental" bruising or injury with or without a history of how the injury occurred

Types of injury which may indicate child abuse include:

- Multiple burns, and burns on unusual areas of the body such as back, shoulders or buttocks
- Scalds where the child appears to have been "dipped" in too hot water
- Cigarette burns
- Bite marks
- Damage to mouths
- Emotional abuse

This form of abuse almost always accompanies other forms of abuse. It includes persistent criticism, denigration, rejection and scapegoating. It has an important impact on a child's mental health, behaviour and self-esteem.

Emotional Abuse

The following are possible indicators of emotional abuse:

- Abnormal attachment between a child and parent/carer, e.g. anxious, indiscriminate or no attachment
- Carer shows a persistently negative attitude towards the child
- The child consistently experiences low warmth and high criticism from its parent/carer(s)
- A fixed stare

- Older children may show evidence of mental health issues such as depression, self-harm or eating disorders, or may have behavioural or educational difficulties
- Acting out aggressive behaviour
- A child who is consistently reluctant to go home after school or nursery
- A child who struggles to engage in normal social activity and conversation with peers or adults
- A child who runs away from home
- A child with a very low self-esteem and or who will consistently describe themselves in very negative ways such as "I am stupid, naughty, hopeless, ugly"
- A child living in an environment of domestic abuse, alcohol or substance misuse

Sexual abuse

Although there are some indicators relating to sexual abuse, in many cases this form of abuse is well hidden, with the only overt signs being a child's behaviour in general or towards an individual, and this may be attributable to many things unrelated to sexual abuse. This makes sexual abuse very difficult to identify

The following may be indicators of sexual abuse:

- Bruising or bites to breasts, buttocks and around the genital area could be signs of sexual abuse as well as physical abuse
- Sexually abusive behaviour
- Sexually explicit play, continual open masturbation or aggressive sex play with peers (as distinct from normal sexual curiosity)
- Extreme use of sexually explicit language and/or detailed descriptions or drawings of sexual activity
- Self-harm
- Running away or regular absences from home or school (particularly in the case of organised abuse)
- Pregnancy
- A sexually transmitted infection

Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour.

Young people who are being sexually exploited may:

- Be involved in abusive relationships, intimidated and fearful of certain people or situations
- Hang out with groups of older people, or antisocial groups, or with other vulnerable peers
- Associate with other young people involved in sexual exploitation
- Get involved in gangs, gang fights, gang membership
- Have older boyfriends or girlfriends
- Spend time at places of concern, such as hotels or known brothels
- Not know where they are, because they have been moved around the country
- Go missing from home, care or education.

Neglect

There are no specific features which indicate neglect, other than that the child's basic needs are not adequately met. Neglect is a pattern, not an event, so it is important to consider the standard of care the child received over time; a pattern of neglect may be missed if each individual event is considered in isolation.

The following may be indicators of neglect:

- Exposure to danger, for example cold (inappropriate clothing for the weather) or starvation
- Repeated failure to attend to the physical and developmental needs of the child, to provide warmth, appropriate clothing, food and consistent care
- Faltering growth (failure to thrive) in babies or toddlers
- The child has responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- Poor supervision of young children resulting in frequent accidental bruising or injury
- The child is always dirty and/or hungry
- The child is left at home alone or with inappropriate carers
- The child is regularly not collected from care settings
- Eating disorders, including stealing and/or hoarding food
- Failure to attend routine medical appointments
- Failure to attend to the child's medical needs and refusal of appropriate treatment

Recognising Potential Risk to an unborn Child

In some circumstances, agencies or individuals are able to anticipate the likelihood of significant harm with regard to an expected baby. Indicators may include

- Domestic abuse within the household
- Alcohol and substance misuse by mother, leading to possible harm to the unborn child, or by others with risk to new-born
- Secret or hidden pregnancy or the mother's mental health problems

These concerns should be addressed as early as possible in order to provide sufficient time for full assessment and support so as to enable the parents (wherever possible) to provide safe care.

People with Disabilities

Research suggests that children and young people with disabilities are more vulnerable to physical, emotional or sexual abuse or neglect than a non-disabled child. The level of risk may be raised by:

- A need for practical assistance in daily living, including intimate care from what may be a number of carers
- Carers and staff lacking the ability to communicate adequately with the child
- A lack of continuity in care leading to an increased risk that behavioural changes may go unnoticed
- Physical dependency with consequent reduction in ability to be able to resist abuse
- An increased likelihood that the child is socially isolated

- Lack of access to "keep safe" strategies available to others
- Communication or learning difficulties preventing disclosure
- Parents' or carers' own needs and ways of coping conflicting with the needs of the child

In addition to the indicators of abuse and neglect listed above, the following indicators must also be considered in relation to disabled children:

- Force feeding, or impatience in feeding leading to under feeding/under nourishment
- Unjustified or excessive physical restraint
- Rough handling
- Extreme behaviour modification, including the deprivation of liquid, medication, food or clothing or social contact
- Misuse of medication, sedation, heavy tranquillisers
- Invasive procedures against a child's will
- Deliberate failure to follow medically recommended regimes
- Misapplication of care programmes or regimes
- Ill-fitting equipment (e.g. callipers, sleep board causing injury or pain, inappropriate splinting)
- Undignified or culturally inappropriate intimate care practices

Institutional Abuse

Children and young people with disabilities are particularly vulnerable to this kind of abuse where practices and behaviours by staff in organisations have become institutionalised or commonly accepted practice. However those behaviours may cause significant harm (as above) and/or may be an abuse of the child's rights. Examples of the latter could be:

- Where a child's communication board does not accompany the child everywhere
- Staff who assume a child's wishes or communication and speak for them
- Staff who do not facilitate a child's own communication because of the difficulty or time it takes
- Attributing difficult or challenging behaviour to the child's condition rather than identifying it as communication

All staff and volunteers within NHYC must be alert to signs of institutional abuse or unprofessional practices or behaviour and raise their concerns as per the procedures outlined above.

APPENDIX B – Specific Forms of Abuse

Child Sexual Exploitation

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Grooming

Grooming is when a person builds a relationship with a child, young person or an adult who is at risk so they can abuse them and manipulate them into doing things. The abuse is usually sexual or financial, but it can also include other illegal acts.

Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be of any gender or sex and they could be any age.

Many children and young people don't understand that they have been groomed or that what has happened is abuse. Groomers will hide their true intentions and may spend a long time gaining a child's trust. Groomers may try to gain the trust of a whole family to allow them to be left alone with a child and if they work with children they may use similar tactics with their colleagues.

Bullying and online abuse

Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – e.g. at school, at a youth club, at home, in the workplace or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

NHYC has a zero-tolerance approach to bullying, this is outlined in the Shared Commitment. Any young person who discloses that they are being bullied, or who is observed bullying others, will be supported and managed in line with the Inclusion Policy. The Harassment and Bullying Policy outlines the organisational steps to be taken when a staff member believes they are experiencing harassment or bullying. It provides a safe, non-threatening way to seek action and resolve the issue quickly. The policy is intended to give confidence to anyone who may be afraid to raise concerns due to fear of reprisal or ridicule, and to put NHYC's firm commitment to eliminating harassment and bullying into practice.

Sexting and sharing of sexual imagery

Sexting is when a person sends or posts a sexually explicit image, video or text, usually on a mobile phone. It is online abuse if a child or young person is pressured or coerced into sending these types of images. Creating and sharing sexual imagery of under-18s is illegal.

The taking and sharing sexual imagery of children by children may be referred to as Youth Produced Sexual Imagery. The types of incidents which may be encountered are:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

A referral should always be made if:

- An adult is involved
- The child is under 13
- It involves unusual sexual acts
- The young person is being coerced, blackmailed or groomed
- The young person has special needs
- There is immediate risk of harm, e.g. suicide

Police have discretion under Outcome 21 of whether to prosecute as they do not want to criminalise children unnecessarily

The sharing of sexual imagery of people under 18 by adults constitutes child sexual abuse and the police should always be informed.

Further advice and guidance can be found on the NSPCC website.

Female Genital Mutilation

Female genital mutilation (FGM) comprises all procedures involving partial or total removal of the female external genitalia or other injury to the female genital organs for non-medical reasons as defined by the World Health Organisation (WHO). Also referred to as 'cutting' or 'female circumcision'.

It is illegal to perform FGM or allow it to happen.

It can be carried out when a girl is new-born, during childhood or adolescence, just before marriage or during pregnancy. It is common for it to be done to girls around the time of puberty

Breast Ironing

In the procedure, hot objects, including stones and hammers, are used to pound and beat girls' breasts to stop them growing, in the belief it makes them less desirable to men and discourages premarital pregnancy and rape. Performed on girls as young as 8 until the end of puberty

Breast ironing is both physically and psychologically damaging. It can cause infections and abscesses and has been linked to breast cancer, problems with breastfeeding, and severe depression

Forced Marriage

Forced marriage is a marriage in which one or both of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of their parents or a third party (such as a matchmaker) in identifying a spouse.

Peer-on-Peer abuse

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement.

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.
- If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

Organised Abuse

Organised or multiple abuse involves one or more abusers and a number of children.

Organised and multiple abuse occur as part of a network of abuse across a family or community and within institutions such as residential homes, schools, sports clubs and voluntary groups

Radicalisation

Radicalisation is the action or process of causing someone to adopt radical positions on political or social issues. This could happen to a child or young person if they feel:

- Isolated and lonely or wanting to belong
- Unhappy about themselves and what others might think of them
- Embarrassed or judged about their culture, gender, religion or race
- Stressed or depressed
- Fed up of being bullied or treated badly
- Angry at other people or the government
- Confused about what they are doing

Someone who has been radicalised might believe that sexual, religious or racial violence is OK. They might have links to extreme groups that preach hate like Nazi/Fascist groups or Islamic extremists like Daesh, also known as ISIS or IS.

Having extreme views can be dangerous and can often lead to harmful and illegal activities involving violence, attacks, discrimination or hate

The **Prevent Duty** requires specified authorities such as education, health, local authorities, police and criminal justice agencies (prisons and probation) to help prevent the risk of people becoming terrorists or supporting terrorism.

So-Called Honour Based Violence

So-called Honour Based Violence is a term used to describe murders in the name of so-called honour, sometimes called 'honour killings'. These are murders in which predominantly women are killed for perceived immoral behaviour, which is deemed to have breached the honour code of a family or community, causing shame.

A child who is at risk of so-called honour-based violence is at significant risk of physical harm (including being murdered) and/or neglect,

The perceived immoral behaviour which could precipitate a murder include:

- Inappropriate make-up or dress
- The existence of a boyfriend
- Kissing or intimacy in a public place
- Rejecting a forced marriage
- Pregnancy outside of marriage
- Being a victim of rape
- Inter-faith relationships
- Leaving a spouse or seeking divorce

Murders in the name of 'so-called honour' are often the culmination of a series of events over a period of time and are planned. There tends to be a degree of premeditation, family conspiracy and a belief that the victim deserved to die.

Victims are sometimes persuaded to return to their country of origin under false pretences, when in fact the intention could be to kill them.

Children sometimes truant from school to obtain relief from being policed at home by relatives. They can feel isolated from their family and social networks and become depressed, which can on some occasions lead to self-harm or suicide.

Families may feel shame long after the incident that brought about dishonour occurred, and therefore the risk of harm to a child can persist. This means that the young person's new partner, baby (if pregnancy caused the family to feel 'shame'), associates or siblings may be at risk of harm.

APPENDIX C –CCE (Child Criminal Exploitation)

Statement on CCE

There is recognition nationally that a group of children and young people are vulnerable and need protection from harm through safeguarding procedures under the heading Child Criminal Exploitation (CCE). CCE has been recognised as a potential reason for serious harm, repeated missing episodes and a reason why a child or young people may disengage from services for weeks at a time. In these circumstances children and young people may have been groomed into working on County Lines and be sent to various locations to sell drugs or work illegally in poor conditions.

Staff at NHYC will be trained and supported to recognise signs of Modern Day Slavery in all its facets and understand the safeguarding protocols in place to support young people such as the National Referral Mechanism (NRM). Staff at New Horizon Youth Centre will be able to recognize the signs that someone may be involved in or being groomed for criminal exploitation and be able to support children and young people to recognize these signs and where appropriate take action.

NHYC will work to ensure children and young people are aware and able to recognise the ways in which this exploitation and grooming can happen. If there are concerns that a young person is being groomed or is involved in CCE the relevant network will be informed and referrals made to bring in additional support, in conjunction with NHYC Designated Safeguarding Officers. Staff should feel confident when referring 16/17-year-olds to Children's Social Care for concerns of CCE that this will be taken seriously and appropriate safeguards will be put in place.

What is county lines exploitation?

County lines is a major, cross-cutting issue involving:

- Drugs
- Violence
- Gangs
- Safeguarding
- Criminal and sexual exploitation
- Modern slavery
- Missing persons

The response to tackle it involves:

- The Police
- The National Crime Agency
- A wide range of government departments
- Local government agencies
- VCS (voluntary and community sector) organisations

The UK government defines county lines as:

"County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons."

County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

What is Child Criminal Exploitation (CCE)?

CCE is increasingly used to describe this type of exploitation where children become involved in criminal activity, and is defined as:

"Child criminal exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology."

Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.

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

- Can affect any child or young person (male or female) under the age of 18 years
- Can affect vulnerable adults over the age of 18 years
- Can still be exploitation even if the activity appears consensual
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- Can be perpetrated by individuals or groups, males or females, and young people or adults
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (for example, carrying drugs in return for something). Where it is, the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection).

It is important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person or vulnerable adult does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange, for example a young person who engages in county lines activity to stop someone carrying out a threat to harm his/her family.

Organised criminal gangs are known to target vulnerable children and adults. Some of the factors that heighten a person's vulnerability include:

- Having prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- Social isolation or social difficulties
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other people involved in gangs

- Having a physical or learning disability
- Having mental health or substance misuse issues
- Being in care (particularly those in residential care and those with interrupted care histories)
- Being excluded from mainstream education, in particular attending a Pupil Referral Unit

Signs to look out for:

A young person's involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a person's lifestyle should be discussed with them.

Some potential indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of-area
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls and/or having multiple handsets
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

Signs for staff to be aware of at New Horizon Youth Centre:

As well as all the above signs, the following *may* be indicators that young people are at risk of or being exploited through CCE:

- Young person person presents to NHYC and is fleeing violence and is actively worried about their safety and their family's safety
- Young person engages well but has long periods of time when they answer the phone but tell staff they are not in the area, or not in London and are unable to meet
- Young person seems anxious to engage and talk about any aspect of their lives
- Young person is not staying at their accommodation and receives warnings
- Young person seems anxious not to answer their phone when it rings
- Young person discloses involvement in drug dealing/ criminal activity
- Young person becomes immediately involved in offending behaviour again on release from custody

There is also evidence from previous case work at NHYC that children and young people may grow up through the hierarchy of offending and drug dealing and then themselves play a role in the exploitation of younger members of the community or children. Should this become a concern for staff at NHYC, this should be discussed with their manager in the first instance who will raise concerns with the safeguarding lead where relevant. Some young people known to NHYC were the first in the country to be convicted of

Child Criminal Exploitation and are currently serving sentences in custody. Therefore, it is of paramount importance that staff receive training in this area and feel confident to recognise and take the appropriate steps.

National Referral Mechanism

The National Referral Mechanism (NRM) is the framework through which potential victims of trafficking in the UK are identified, so that they can be supported and protected. It is a particular process to be followed when it is suspected that an adult or a child might be a victim of trafficking. In the case of a child, the child's best interests will be a primary consideration in the decision to make, or not to make, a referral into the NRM. Referring to the NRM has several implications that will be considered by the First Responders.

Referrals into the NRM can only be made by selected agencies known as 'first responders'. If you are not a first responder and you believe you have identified a victim of child trafficking, then you will need to refer the child to a first responder in order for them to be referred into the NRM.

The following are currently recognised as first responders:

- The National Crime Agency
- Police forces
- UK Border Force
- UK Visas and Immigration (Home Office)
- Gangmasters Licensing Authority
- Local authorities
- Health and social care trusts (Northern Ireland)
- TARA Project (Scotland)
- New Pathways
- Refugee Council
- Salvation Army
- Migrant Help
- Medaille Trust
- Kalayaan
- Barnardo's
- Unseen
- NSPCC Child Trafficking Advice Centre
- BAWSO (Wales)
- ECPAT
- The Children's Society

**Information above provided by Coram's Children's Legal Centre*

Referrals to the NRM are not compulsory but if the potential victim of trafficking is a child, the referral can be made without their consent.

Support for Children and Professionals

Unseen runs a free helpline that people can ring to get general advice about the process of being identified as a victim of modern slavery.

- Their details are here: www.modernslaveryhelpline.org/
- The free number to call is 08000 121 700

The NSPCC has very useful guidance for staff and young people pertaining to CCE on their website:

https://learning.nspcc.org.uk/child-abuse-and-neglect/child-trafficking-and-modern-slavery#heading-top

APPENDIX D – Restraint

Definition of Restraint

Restraint is an intervention that prevents a person from behaving in way that threatens to cause harm to themselves, to others, or to property, by reducing the ability of a person to move their arms, legs, body or head freely.

NHYC policy on Restraint

It is the policy of NHYC that staff, volunteers and students should never restrain a young person participating in our services.

All NHYC staff are required to attend regular conflict management training. The techniques learned on this training will be used to de-escalate a potential incident situation, thus negating the need for restraint. NHYC staff are also encouraged to contact the emergency services in situations where de-escalation methods have failed or are inappropriate.

There may be extreme circumstances where a staff member does end up physically intervening due to the firmly held belief that a young person is at risk of seriously physically harming themselves or others and all other forms of de-escalation have failed. The NHYC member of staff must be able to justify their actions in these circumstances and will be supported by NHYC.

All staff must be aware that attempted to restrain someone could result in positional asphyxia. Any physical intervention must be for the shortest amount of time possible and be stopped immediately should the person involved state that they are struggling to breathe.

After an Incident

Should a physical incident occur in the centre, an incident report form must be completed and sent to a Designated Safeguarding Officer. Should a staff member end up physically intervening with a young person, their parent, legal guardian or relevant support workers should also be informed where it is appropriate to do so.

It is distressing to be involved in or witness a physical incident. All those involved should be offered support to discuss what has happened and reflect.

APPENDIX E – Local Safeguarding Children Partnerships and Other External Agencies

The London Safeguarding Children Board has published child protection procedures for the 33 London Boroughs. NHYC comes within the remit of the Camden Local Safeguarding Children Partnership. Procedures can be found on their website: https://cscp.org.uk/

External Agencies who can offer support:

The Disclosure and Barring Service (DBS)

NSPCC Tel: 0844 892 1026

Child Protection Helpline (24 hours): To report or discuss concerns about a child's welfare. Tel: 0808 800 5000 or Textphone: 0800 056 0566 or email: help@nspcc.org.uk

ChildLine Tel: 0800 1111

Save the Children. Tel: 020 7012 6400 Freephone: 0800 814 8148

Child Exploitation Online & Protection Centre (CEOP)

UK Safer Internet Centre Tel: 0344 381 4772

APPENDIX F – New Horizon Youth Centre Protocol for supporting young people remotely

Why do we have this protocol?

This protocol is in place to ensure staff have clear guidelines for appropriately supporting young people remotely. It is intended to safeguard both staff and young people. While this protocol was intended to cover the Covid-19 period, the basic principles around communication guidelines remain the same when applying to both remote and face-to-face work.

Telephone Contact – Guidelines

Young people may be contacted by phone in the following situations:

- General check-ins
- To provide practical advice, share information or make referrals to other organisations
- To complete or update electronic needs assessments (Advice)
- Telephone counselling (Counsellor)
- To record case studies

Staff must only use approved work mobile phones to make calls or send text messages to young people when working remotely. In some circumstances, staff can use personal phones for phone calls, providing they set their caller ID to private. Staff must never give young people their personal phone numbers or message/WhatsApp a young person from a personal phone, unless specific permission has been granted by their line manager in exceptional/emergency circumstances. This would be considered a breach of the Safeguarding Policy.

When contacting a young person by phone, staff should ensure that as far as is possible, we have confirmed that the young person is in a suitable location for the conversation. For example, are they in a public or private space? Is the location quiet enough to be able to hear each other clearly? Are there other people in the background who might be able to hear the conversation and if so, does this pose any risk to the young person? If staff are not satisfied that the young person is in a suitable, safe space, they may need to reschedule the call for another time. This is particularly important for telephone-based needs assessments and telephone counselling.

All telephone contact should be logged on InForm Any telephone contact that includes a young person disclosing a potential safeguarding issue must also be raised directly to one of the Designated Safeguarding Officers.

Telephone contact with young people should only be made between 9:30 and 4:00, unless there is a pressing safeguarding concern and it has been agreed in advance with a manager, or staff are on a pre-arranged outreach shift/community visit.

Email correspondence – Guidelines

Staff must only contact young people using their NHYC work email address. Staff should ensure they include their up-to-date NHYC signature whenever signing off emails.

Emails should only be sent to young people between 9:30 and 5:00, unless there is a pressing safeguarding concern **Assessments**

Teams may carry out assessments with young people on a remote basis. Staff should follow the basic telephone contact advice guidance above. Additionally, they should outline the key topics that the assessment will cover to the young person at the start of the appointment. This will ensure the young person is aware of the potentially sensitive nature of the discussion and can respond accordingly. Young people should be invited for a telephone assessment at a pre-agreed time in order for them to be able to best prepare themselves for the conversation.

Assessment forms and other information must be saved securely in the relevant Operations folder on SharePoint. Assessments are confidential documents and must not be saved to personal computers, desktops or documents folders. Any safeguarding concerns disclosed as part of the assessment must be raised to a designated safeguarding officer.

Consent must continue to be captured from young people prior to an assessment. This can be done by email when working remotely. In some circumstances, we may need to ask for verbal consent. For example, when a young person does not have a working email account or access to the internet.

Online Delivery

From time-to-time, staff may deliver online workshops to young people. Sessions take place via Zoom or Microsoft Teams. No other platforms are approved for use at this stage. The guidelines for online sessions are:

- One-to-one video calls with young people should be avoided
- Two members of staff or a delivery partner should be present on group sessions, one acting as host and one as co-host. An additional member of staff will be on call in order to respond to any concerns or safeguarding issues that arise.
- Staff will have full control over the technical features of the meeting. For example ensuring participants can be muted or removed, disabling screen sharing etc.
- Staff will also communicate any safeguarding concerns to the Designated Safeguarding Lead.
- Sessions should take place between the hours of 10:30 and 4:00, unless with prior agreement
- Only young people that have completed their needs assessment can attend online sessions, and young people must be invited in advance.
- Young people must be aged 18 or over to attend
- Young people will be briefed on expectations for the session in advance, and reminded of the code of conduct at the start of each session.
- No personal information to be shared on the session e.g. anything that might identify where a young person lives.
- There will be a debrief between staff following each session.

Any safeguarding concerns raised from an online session should be managed in line with the NHYC Safeguarding Policy.

APPENDIX G – Protocol for sharing information with statutory services

In addition to raising safeguarding concerns to Children's Services or Adult Social Care, we may on occasion be required or requested to share information about young people with other statutory services such as the Police or Probation.

Our general approach is not to share information without the young person's consent, unless there is evidence that the young person or someone else might be at risk of significant harm. This is an important part of how we build trust with young people and support them to make positive decisions and move forward with their lives, and is outlined in our Confidentiality Policy.

However, there are circumstances where we may be required to share information without obtaining explicit consent, for example:

- When we are listed as a named partner on a young person's Youth Offending Service order.
- We receive a request under Schedule 2 of the Data Protection Act (2018) for the purpose of the prevention, investigation and detection of crime.
- We are presented with a warrant for a young person's arrest

In addition to this, if we become aware of information indicating that there is potential risk of serious harm to a young person or to others, we will cooperate with statutory services as necessary to ensure the risk is addressed.

In deciding whether to share information, and before doing so, staff must ensure they have consulted with their line manager and/or a Designated Safeguarding Officer. Decisions to share personal information must be made at a senior management level and usually, with involvement from a Designated Safeguarding Officer or the Data Protection Officer.

Any requests for personal or sensitive information about young people (e.g. name, DOB, or contact details) should be made in writing by the relevant agency and directed to the Data Protection Officer or Designated Safeguarding Lead. They will assess whether the sharing of information meets the threshold for disclosure if consent has not already been given. Decisions made to share information will be recorded on In-Form and be accessible to the Designated Safeguarding Officers.

Designated Safeguarding Officers will carry out audits of young people's cases on a quarterly basis to ensure best practice on appropriate handling of risk information.

Specific Situations

- Police officers arrive at the centre asking to speak to a young person
    - *Offer to speak to the police on the forecourt and ask if they have a warrant.*
    - *If they do not, let them know that we have an agreement in place with the local BCU for police not to arrest or issue warrants on the premises. Agree to take details of the young person they are looking for and reassure them that we will encourage the young person to contact them should they present.*
    - *Do not share contact details for the young person. The police may email the Data Protection Officer if they wish to request further information.*

- Police officers arrive at the centre with a warrant for a young person's arrest
    - *Ask the police to execute the warrant off the premises and to wait outside.*
    - *If the young person is in the building, inform them that the police are here with a warrant and ask them to go outside.*
    - *If the young person is not in the building, inform the police that they are not here*
    - *Do not share contact details for the young person. The police may email the Data Protection Officer if they wish to request further information.*

- Staff become aware of information indicating a potential serious risk of harm to the young person or to another person
    - *Consultation must take place as soon as possible with the line manager and/or DSO as to whether the information needs to be shared with other agencies in order to mitigate the risk. Decisions and the reasons underlying them must be recorded.*