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Aran Hall School Child Protection and Safeguarding Policy

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| Policy Section Number | 5 |
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This policy should be read alongside and in conjunction with other policies and documents regarding the safety and welfare of children. These together make up the suite of policies and documents to safeguard and promote the welfare of children:

Missing From Care (Policy 616 + Site related)
DOLS (for adults)
Safe Handling of Medication (Policy 306, 217 and appendices)
Handling of Clients Monies/Funds (Policy 606 and 511)
Risk Assessments (Policy 217 and forms also)
Privacy and Confidentiality of our clients' needs and information (Privacy 517; Visitors 525 and Searching a Young Persons Belongings 521)
PREVENT and Countering radicalisation (Policies 506*** and 506.8)
Anti-Bullying (Policy 502)
Complaint Processes (Policies 714 and 519)
Online Safety (Policy 510)
Physical Interventions Policy 516
Whistleblowing Policy 413
Positive Behaviour Support (515) and Physical Interventions (516)
Safe Touch and Relationships (518)
Significant Harm Policy (524)
Private Fostering (512)
GDPR Policies (Section 9 of policies)
Intimate and Personal Care (610)
Caring for sexually abused Individuals in our care (522)
Consent (508)
Safeguarding and promoting the welfare of pupils at the school (713)
Self-Harm and prevention of suicide (308)
Recruitment and selection of staff (414)
Social Media Policy (421)

Related Policies and Guidance Documents

Annexes and Supplementary Info

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| Responsible Person | Mark Ryder/Suzanne Pennington |
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Child Protection and Safeguarding Policy

SENAD takes its responsibility to safeguard the welfare of young people very seriously. Our policy is based on the Welsh Government Guidance set out in circulars Keeping Learners Safe Guidance - Document 283/2022 and Safeguarding Children in Education: handling allegations of abuse against teachers and other staff 009/2014.

The Principal and Registered Manager will ensure all staff will be committed to its policies and procedures to ensure all individuals are kept safe, free from harm and have their needs and welfare promoted at all times.

The principles of safeguarding apply to all those people we work with so the term children & young people are used interchangeably and apply to everyone with equal importance. This policy should be read in conjunction with:

- **All Wales Safeguarding Procedures** – online only
(<https://www.safeguarding.wales/>)
- Keeping Learners Safe Guidance - document no: 283/2022
- Working Together to Safeguard Children 2018 (update Dec 2020)
- **Keeping Children Safe in Education (2020)**
- Procedures for Reporting Misconduct and Incompetence in the Education Workforce in Wales Guidance 168/2015
- Children Act 1989 and 2004;
- Working Together under the Children Act 2004
- Think Family research – Barnardos 2009;
- What to do if you are worried a child is being abused 2006;
- Section 175 Children Act 2002
- Safeguarding Children and Safer Recruitment in Education 2007
- Regulation and Inspection of Social Care (Wales) Act 2016 Reg:26/27
- Safeguarding Children in Education September 2004
- Social Care Wales “Code of Professional Practice for Social Care”.
- Supervision guidance
- Social Services and Wellbeing Act (Wales) 2014 (Section 3)
- Protection of Freedom Act 2012
- UN Convention on the Rights of the Child 1989 (Wales)
- ‘Prevent Duty Guidance’ for England & Wales – on the duty in the Counter Terrorism and Security Act 2015
- NSPCC – Harmful Sexual Behaviour Framework.
- SENAD Public Interest Disclosures (Whistle-blowing) Employee Policy (Section 4 Policy 413)
- SENAD Recruitment Policy & Procedure (Section 4 Policy 414)
- SENAD Disciplinary Rules & Procedure (Section 4 Policy 404)
- SENAD E-Safety Policy (Section 5 Policy 510)
- SENAD Tackling Extremism & Radicalisation Policy (Section 5 Policy 506.8)
- Reducing Restrictive Practices Framework – Welsh Government W/G 42973
- Together we’ll Keep Children and Young People Safe as we rebuild from COVID-19 Non – statutory guidance for practitioners July 2020

Establishments in Wales

The Children Act 1989 stands for establishments in Wales in that the subsequent Children Act 2004 (Part 3 section 25 ff) affirms that the Welsh Government makes provision for the wellbeing of children.

All establishments are accountable to the Local Safeguarding Children Boards set up in Wales which are in place to ensure policies and procedures are effective. The legislation also affirms in section 28 the requirements to co-operate in safeguarding and protecting children.

Safeguarding Boards for Aran Hall School

The relevant Local Safeguarding Board for Aran Hall School is as follows:

| Safeguarding Board | County located within |
|--|---|
| Gwynedd & Anglesey Local Safeguarding Children Board | Gwynedd North Wales Safeguarding Board (gov.wales) |

The Local Safeguarding Boards can be contacted as follows:

| Gwynedd & Anglesey Local Safeguarding Children Board |
|--|
| Gwynedd Council, Shirehall Street, Caernarfon, LL55 1SA |
| Out of Hours 01248 353 551 Abuse suspected contact no: 01766 772577 childreferral@gwynedd.gov.uk cyfeiriadauplant@gwynedd.llyw.cymru Board Manager: 01286 679 926 |

Safeguarding Policy Statement

The Welfare of the Child is Paramount (Children Act 1989);

- For establishments in Wales, Part 3 Section 25 Children Act 2004 applies and reinforces the same duty of care for those establishments;
- In Wales, SENAD will comply with the Welsh Government Keeping Learners Safe Guidance - document no: 283/2022.
- All young people irrespective of their age, cultural background, disability, gender, language, racial origins, religious beliefs, transgender, sexual orientation have the right to be protected from abuse;
- All suspicions and allegations of abuse will be taken seriously and responded to without delay;
- Senior Managers will take responsibility for ensuring that such concerns are dealt with according to SENAD procedures;
- All staff, including temporary or agency staff as well as contractors will subscribe to the SENAD policy and procedure and will report any concerns accordingly;
- The duty of care to all goes beyond just the presenting concern as it may be that the concern highlights relevant and connecting issues in the rest of the family.

In order to fulfil these requirements, Aran Hall School and SENAD will:

- Follow the procedures set out in the All-Wales Child Protection Procedures.
- Work to prevent or eliminate, as far as is possible, incidents of, or threats from, any form of abuse within any establishments of the SENAD organisation;
- Ensure it has all policies and procedures in place that are up-to-date and relevant for the safety of all and to ensure all concerns are processed speedily and efficiently;
- Have in place reviewing, auditing and supervision mechanisms to ensure that all staff and volunteers and other appropriate people are fulfilling their responsibilities and that current systems are effective;
- Offer assurances and undertakings to young people, their parents/carers, placing authorities and appropriate Local Authority agencies of the care young people will get and the framework for dealing with the prevention of harm and abuse;
- Ensure that all establishments have in place appropriate training programmes to maintain staff awareness of their responsibilities in relation to Child safeguarding;
- Ensure that SENAD complies with all relevant national and local changes in legislation, guidance and protocols.

Staff and other professionals working within the School and children's home should be alert to the potential need for early help for children, young people and young adults, considering following the procedures identified for initiating early help for a child who:

- Is disabled and has specific additional needs.
- Has special educational needs.
- Is a young carer.

- Is showing signs of engaging in anti-social or criminal behaviour.
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence; and/or
- Is showing early signs of abuse and/or neglect.
- Is showing signs of displaying behaviour or views that are considered to be extreme

These children are therefore more vulnerable; this School/Home will identify who their vulnerable children are, ensuring Staff and professionals know the processes to secure advice, help and support where needed.

Reporting Structures within Aran Hall & Designated Person

Aran Hall School will have a named person for safeguarding who is sufficiently experienced, trained in line with Local Safeguarding Children Board requirements and understands in detail the policies and procedures of SENAD and Aran Hall School. The name of that person will be clearly publicised throughout the establishment and promoted in staff training.

There will also be Deputy Named Person(s) who will act in the absence of the named person. These named people are as follows:

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| <i>Named Person</i> |
| Andy Pryer-Smith: Head of Care / Registered Manager |
| <i>Deputy Named Person(s)</i> |
| Llio Eiri: Principal |
| Veda Richards: Head of Pupil and Staff Wellbeing |
| |

All staff will have the necessary training in relation to safeguarding children:

- A brief introduction to safeguarding, once in post
- A one day introduction to safeguarding children
- Refresher training normally annually (and no later than 15 months)
- Training for Managers and Senior Managers on their role in the procedure
- Specialist training as appropriate often accessed via the Local Safeguarding Children Board or equivalent experienced providers

SENAD acknowledges its role as a partner agency alongside others and will work with them in ensuring everyone within SENAD establishments receives the right care and protection.

The lead safeguarding directors for the SENAD group are;

| | | |
|---------------------------|------------------------------------|---------------|
| Mark Ryder | Director of Children's Social Care | 07719 940 613 |
| Suzanne Pennington | Director of Education | 07562 687 456 |

Both are also contactable via Vernon Gate, the SENAD Head Office on 01332 378840.

A member of the head office staff will be able to make contact with one or both directors in the case of an urgent situation.

Alternatively, either can be contacted by e-mail

mark.ryder@senadgroup.com or suzanne.pennington@senadgroup.com

or by letter or e-mail;

The SENAD Group, 1 St George's House, Vernon gate, Derby, DE1 1UQ

notify@senadgroup.com

Reporting Concerns about Senior Staff in Wales

In accordance with the principles of this SENAD Group policy and specific legislation and guidance from the Welsh Government, any concern relating to senior managers (namely the Principal or Registered Manager) will be **automatically referred to the Local Safeguarding Board** and there from to Estyn or CIW.

A member of staff can make this **referral direct** to one of the following statutory agencies without reference to SENAD, the proprietor **or** by contacting **Mark Ryder** (Director of Children's Social Care) or **Suzanne Pennington** (Director of Education) or **Victoria Finn** (Group Human Resources Director), who will make this referral to the relevant agency on behalf of the member of staff.

Gwynedd & Anglesey Local Safeguarding Children Board (LSCB).

01766 772577 (or 01248 353551 outside office hours)

Estyn (for Aran Hall School)

Anchor Court
Keen Road
Cardiff
CF24 5JW

Contact safeguarding@sharepoint.estyn.gov.uk

Telephone Office 02920 446 446 or 24 hours 02920 446 482/484

CIW North Wales Region, (for Aran Hall School Children's Home)

Government Buildings,
Sarn Mynach,
Llandudno Junction
LL31 9RZ

Telephone: 0300 790 0126

Fax: 0872 437 7301

Email: CIW@gov.wales

The Voice of the Young Person

In the light of findings from National Serious Case Reviews, it is essential that central to the care and support of any young persons should be the opportunity afforded to them to express their views and contribute to decision making processes about them.

The Children Act 2004 Section 53 and the Social Services and Wellbeing Act (Wales) 2014 make clear the need to seek the wishes and feelings of children when appropriate and especially when considering the provision of services for them.

Staff will do everything they can to ensure that the young person's voice is sought, respected and considered at all times. The only exception would be if it is felt that to seek the young person's wishes and feelings would cause additional distress or harm. However, staff should use their experience and expertise and knowledge of the young person to try as much as possible to ensure the young person's voice is heard and considered.

Information needs to be available to the young person so they are aware of how to report any concerns about staff, their family or others.

Relationships with Parents/Carers

SENAD believes that the earlier the parents/carers are engaged in the care and support of young people and especially any concerns raised about their child, the better the outcome for the young person.

Relationships with parents/carers form a valuable and essential contribution to the way support is offered and this should be promoted.

The procedure section makes clear when and how to include parents when dealing with a specific concern.

The Safeguarding of Young People

The Children Act 1989 defines a child as anyone up to the age of their 18th Birthday. Children who have been accommodated by the Local Authority as a Looked After Child at their 18th birthday may need on-going Local Authority support up to their 21st birthday.

It is important to recognise that in the light of lessons learned from National and Local Serious Care Reviews, the safeguarding of children is more to do with the promotion of their welfare and needs through every aspect of their school life and staff should work continually to have their needs in mind to ensure they are the focus of all that is offered in support of the child. The protection of children is only one aspect of the need to safeguard and promote their welfare.

Safeguarding children requires constant attention to the needs of the child through care planning, the assessment processes and any mechanism in place for supporting the child. It is central to how care and support is offered.

Section 17 of the Children Act 1989 requires Local Authorities to identify children in need as those whose health and development would be impaired if Local Authority services are not provided. These children are referred to as Children in Need and require early assessment and targeted services.

Section 47 of the Children Act 1989, however, requires the Local Authority to make enquires when it is considered a child has suffered, or is likely to suffer, significant harm

We have an equally important role to safeguard all those people in our care and this guidance applies to everyone.

In reality there will be several ways that safeguarding concerns will arise:

- Someone has a “*niggling concern*” – often described as a “*feeling in the belly*” or a “*feeling that something isn’t right*”. Such a response requires staff to talk with each other and begin a dialogue to see if a young person needs an early response or intervention about a particular matter;
- Regular patterns of behaviour or concerns – in isolation, it is likely that a concern could be explained or dismissed. However, with good recording systems, concerns can become more worrying when they are more regular and persistent;
- An understanding of a young person’s chronology and their life events
- Behaviours of young people – given that young people will often communicate their concerns in many different ways and especially through their behaviour, it may be that the behaviour is in itself a form of disclosure;
- Failure of external agencies to respond appropriately to concerns
- Third party information – another child or adult shares information about someone and it may be that the parents/carers of the family pass on information;
- Concerns about workers and how they relate to a young person;
- Observing the behaviour between young people to each other;
- A specific disclosure – a young person makes a specific allegation or disclosure;
- Concerns about a member of staff’s behaviour in relation to their own children, perhaps expressed through social conversation or is evident because the member of staff is going through personal difficulties which could affect their parenting capacity.

All concerns, no matter how they arise should be taken seriously and considered for action and the appropriate steps taken as part of the SENAD Procedures. However, any **concerns of abuse must be reported without delay** as these will always need to be passed to the appropriate Local Authority.

All staff will be alert to their own possible hesitations in passing on concerns of any sort, the most common being:

- The fear of being wrong;
- The fear of reprisals from others;
- The fear of “spoiling” a relationship with a child, their family or a member of staff if it is about them;

- Thinking that a behaviour or concern is “normal” for that child and therefore it can be dealt with as part of their day to day care without any other action necessary;
- Explaining a young person behaviour as part of their disability, thus not giving adequate attention to the concern or even dismissing it;
- Not being strong enough to challenge others who don’t agree that there is a concern and therefore allowing it to be dismissed, especially when a staff member is new or afraid to challenge managers; • Worrying that it will make it worse for the child;
- Not believing they have any responsibility.

In addition, staff should be aware that there are a number of reasons why young people may not want, or be able, to tell of a concern:

- they are scared because they are being threatened;
- they worry about what will happen to them;
- they think what is happening to them is normal for everyone else too;
- English is not their first language
- they cannot communicate in a way that gets their concern acknowledged;
- they are afraid they will not be taken seriously;
- they have tried to tell before but to no avail and so don’t want to bother again;
- they worry about getting their parents/family into trouble.

Further, given the fact that the children supported by SENAD have complex needs, staff will be particularly sensitive to how these present. It is therefore essential that staff record all relevant and pertinent information and raise any concerns no matter how they are presented.

It is NOT the responsibility of front-line staff to make judgements about whether what a child says is true or not. It is important that the correct procedure is followed to ensure a thorough assessment of the concern and then for senior managers to determine the best courses of action.

All staff should be able to access their manager and senior manager at any time throughout the day and even when senior management are not on site, using an on-call system for all round contact. Such rotas should be available to all staff and displayed accordingly and as appropriate.

Our incident form on Clearcare can be used for any concern, no matter how slight, that needs to be assessed, analysed and responded to by senior managers. The “**golden rule**” is that if in doubt, complete this form as the concerns will then be properly looked into.

Failure to report any concern will be seen as a disciplinary matter as it will be clear that a young person may be left vulnerable or in further danger.

It is essential that all staff escalate their concerns if they feel they are receiving an inappropriate or unhelpful response from managers or senior managers. It is not acceptable for a concern to be closed down just because others do not share the same view about the nature of it. It is everyone’s responsibility to ensure young people are safeguarded.

The lead safeguarding managers for the SENAD group are:

Mark Ryder /Suzanne Pennington

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| Both are contactable via Vernon Gate (SENAD Head Office) on 01332 378840 or mark.ryder@senadgroup.com or suzanne.pennington@senadgroup.com |
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| Mobile: 07719 940 613\ 07562687456 |
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The Local Safeguarding Boards can be contacted as follows:

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| Gwynedd & Anglesey Local Safeguarding Children Board |
| Gwynedd Council, Shirehall Street, Caernarfon, LL55 1SA |
| Out of Hours 01248 353 551 Abuse suspected contact nos: 01766 772577 childreferral@gwynedd.gov.uk cyfeiriadauplant@gwynedd.llyw.cymru Board Manager: 01286 679 926 |
| North Wales Safeguarding Board www.northwalessafeguardingboard.wales/ |
| Gwynedd & Anglesey Local Safeguarding Children Board <i>For Aran Hall School</i> |
| Abuse suspected contact nos: 01766 772577 childreferral@gwynedd.gov.uk cyfeiriadauplant@gwynedd.llyw.cymru Board Manager: 01286 679 926 Out of Hours 01248 353551 |

Definitions of Abuse

There are many ways in which young people can be harmed. Abuse and neglect are forms of maltreatment of a young person. Someone may harm or neglect a young person either directly by inflicting harm, or indirectly by failing to prevent harm. Young people may be abused in a family, an institution or community setting: by those known to them: or more rarely by a stranger. They may be abused by an adult or adults, or another young person or persons.

The types of abuse can be as follows:

- **Child Sexual Exploitation (CSE)**
- **Domestic Violence**
- **Drugs**
- **Fabricated or induced illness**
- **Faith abuse**
- **Female Genital Mutilation (FGM)**
- **Forced Marriage**
- **Gangs and Youth Violence**
- **Gender based violence/Violence against women and girls (VAWG)**
- **Mental Health**
- **Private Fostering**
- **Radicalisation & Extremism**
- **Sexting**
- **Teenage Relationship abuse**
- **Trafficking**

There are four types of abuse:

- 1. Physical Abuse**
- 2. Emotional Abuse including suspected radicalisation**
- 3. Sexual Abuse**
- 4. Neglect**

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, female genital mutilation (FGM) or otherwise causing physical harm to a young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person. It also includes Child Sexual Exploitation (CSE); Domestic Violence, Drugs; Fabricated or induced illness; Faith abuse; Female Genital Mutilation (FGM); Forced Marriage; Gangs and Youth Violence and Gender based violence/Violence against women and girls (VAWG).

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on the young person's emotional development. This includes: Sexting; Teenage Relationship abuse; Mental Health; Radicalisation; Trafficking and possibly, Private Fostering

It may involve conveying to young people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on young people.

These may include interactions that are beyond the young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment of a young person, though it may occur alone.

Emotional abuse can also include subjecting a young person to radicalisation.

Radicalisation can apply to anyone and is not constrained to certain religions or cultural heritage backgrounds!

The school/college/home will pay attention to the following:

- The expression of anti-inclusive messages that target groups of people, such as women being seen as not being equal, people with non-heterosexual orientation or disabled as being less valued, people of different religions as being unbelievers, or
- The accessing of potentially radical information via the internet, parents/guardians, community visits, other children or staff

Sexual Abuse

Sexual abuse involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. The activities may also involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

Neglect is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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- Provide adequate food, clothing or shelter.
 - Protect a young person from physical and emotional harm or danger
 - Ensure adequate supervision (including the use of inadequate care-givers) or
 - Ensure access to appropriate medical care or treatment

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

Bullying and forms of bullying both on and off-line including prejudice based and Cyber Bullying is also abusive which will include at least one, if not two, three or all four, of the defined categories of abuse.

Signs of Abuse

Physical Abuse

Most children and young adults will collect cuts and bruises and injuries, and these should always be interpreted in the context of the child's medical / social history, developmental stage and the explanation given.

Generally, most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental. Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given; these can often be visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks.

A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body.
- Multiple bruises- in clusters, often (but not only) on the upper arm, outside of the thigh.
- Cigarette burns.
- Human bite marks.
- Broken or fractured bones.
- Scalds, with upward splash marks.
- Multiple burns with a clearly demarcated edge

Changes in behaviour that can also indicate physical abuse:

- Fear of parents, guardians, foster carers, grandparents being approached for an explanation.
- Aggressive behaviour or severe temper outbursts.
- Flinching when approached or touched.
- Reluctance to get changed, for example in hot weather.
- Depression.

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- Withdrawn behaviour.
 - Running away from home (absconding)

Emotional Abuse

Changes in behaviour which may indicate emotional abuse include:

- Neurotic behaviour e.g. sulking, hair twisting, rocking.
- Being unable to play.
- Fear of making mistakes.
- Sudden speech disorders.
- Self-harm.
- Fear of parent being approached regarding their behaviour.
- Developmental delay in terms of emotional progress.

Sexual Abuse

It is recognised that there is underreporting of sexual abuse within the family. School and children's home staff, along with the proprietor's staff play a crucial role in identifying / reporting any concerns that they may have through, for example, the observation and play of younger children and understanding the indicators of behaviour in older children which may be underlining of such abuse.

All staff should be aware that adults, who may be men, women or other children, who use children to meet their own sexual, needs abuse both girls and boys of all ages. Indications of sexual abuse may be physical or indicated by the child's behaviour. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

Physical signs of sexual abuse may include:

- Bruising or bleeding near genital or rectal area.
- Sexually transmitted disease/infection (STD/STI).
- Vaginal discharge or infection.
- Stomach pains.
- Discomfort when walking or sitting down.
- Pregnancy.

Changes in behaviour which can also indicate sexual abuse include:

- Becoming aggressive or withdrawn.
- Fear of being left with a specific person or group of people.
- Having nightmares.
- Running away from home.
- Sexual knowledge which is beyond their age, or developmental level.
- Sexual drawings or language.
- Bedwetting.
- Eating problems such as overeating or anorexia.
- Self-harm or mutilation, sometimes leading to suicide attempts.
- Saying they have secrets they cannot tell anyone about.
- Substance or drug abuse.

- Suddenly having unexplained sources of money or expensive possessions (e.g. toys, computers, phones, bicycle, branded clothes).
- Not allowed to have friends (particularly in adolescence).
- Attachment to certain adults based on their characteristics.
- Acting in a sexually explicit way towards adults.

Neglect

It can be difficult to recognise neglect, however its effects can be long term and damaging for children.

The physical signs of neglect may include:

- Being constantly dirty or 'smelly'.
- Constant hunger, sometimes stealing food from other children.
- Losing weight, or being constantly underweight.
- Inappropriate or dirty clothing.

Neglect may be indicated by changes in behaviour which may include:

- Mentioning being left alone or unsupervised.
- Mentioning not having enough to eat and/or drink when genuinely hungry and/or thirsty
- Not having many friends (or only having digital on-line friends).
- Complaining of being tired all the time.
- Not requesting medical assistance and/or failing to attend appointments.

Prevent Duties

Aran Hall will ensure all staff including volunteers adhere to their duties in the Prevent guidance 2015 to prevent radicalisation.

The Principal, Registered Manager and the Directors of Care and Education of the Proprietor will:

- Establish or use existing mechanisms for understanding the risk of extremism.
- Ensure staff understand the risk and build capabilities to deal with issues arising.
- Communicate the importance of the duty.
- Ensure all staff (including proprietor staff and volunteers) implement the duty.

Aran Hall will respond to any concern regarding Prevent as a safeguarding concern and will report in line with the All Wales Safeguarding Procedures. We will seek to work in partnership, undertaking risk assessments where appropriate and proportionate to risk, building our children's resilience to radicalisation.

Aran Hall is committed to providing effective filtering systems and this will include staff monitoring the activities of children when on-line in the school/home. (e.g. wristband guidance)

Child Sexual Exploitation

Risk factors may include;

- Going missing.
- Engagement in offending.
- Disengagement from education.
- Using drugs or alcohol
- Unexplained gifts/money.
- Repeat concerns about sexual health.
- Decline in emotional wellbeing.

All suspected or actual cases of CSE are a Safeguarding concern in which Child Protection procedures will be followed; this will include a referral to the police. If any staff are concerned about a pupil, they must refer to the Safeguarding Designated Lead/s.

Female Genital Mutilation

Aran Hall School recognises that family members or friends of our students may be female.

The Serious Crime Act 2015 introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police.

Section 130 of the Social Services and Well-being (Wales) Act applies to cases covered by the FGM reporting duty. FGM is illegal in the UK. FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother and /or death.

FGM is a deeply embedded social norm, practiced by some families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman and to be marriageable. The practice is not required by any religion. FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls. Possible indicators may include:

- Days absent from school.
- Not participating in Physical Education.
- In pain/has restricted movement/frequent and long visits to the toilet/broken limbs.
- Confides that she is having a special procedure, cut or celebration
- Unauthorised and or extended leave, vague explanations or plans for removal of a female in a high-risk category* especially over the summer period.
- Plans to take a holiday which may be unauthorised, unexplained or extended in a country known to practice FGM.

Sexually Harmful Behaviour (SHB) (May also referred to as Harmful Sexual Behaviour HSB)

Sexually Harmful Behaviour (SHB) can be defined as: sexual behaviours expressed by children and young people under the age of 18 that are developmentally inappropriate, may be harmful towards themselves or others or be abusive towards another child, young person or adult. This definition of SHB includes both contact and non-contact behaviours (grooming, exhibitionism, voyeurism and sexting or recording images of sexual acts via smart phones or social media applications).

The sexual abuse perpetrated by children can be just as harmful as that perpetrated by an adult. Abusive/inappropriate behaviour is often characterised by a lack of true consent, the presence of a power imbalance and exploitation.

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. It may include children who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults or children and downloading indecent images of children from the internet.

Such abuse should always be taken as seriously as abuse perpetrated by an adult.

The North Wales Safeguarding Board has adopted the ***NSPCC's Harmful Sexual Behaviour Framework***.

Additional information can also be found in Welsh Government Guidance: ***Guidance for education settings on peer sexual abuse, exploitation and harmful sexual behaviour***.

All Wales Safeguarding Procedures Practice Guide

<https://www.safeguarding.wales/chi/c6/c6.p7.html?highlight=harmful>

Allegations of abuse against other children/Peer on Peer abuse

We recognise that some children may abuse other children or their peers; the reasons for this are complex and are often multi-faceted. We understand that Aran Hall needs to have clear mechanisms and procedures in place to identify and report incidents or concerns.

We aim to reduce this behaviour and any related incidents with an expectation to eliminate this conduct in the school/home.

Peer on peer abuse is a safeguarding concern and will require a discussion with the Designated Safeguarding Lead who will seek advice from agencies and professionals including reference to the All Wales Safeguarding Procedures. This may require a referral into the Police and Social Care. The school/home will offer support to a victim.

We recognise peer on peer abuse can take some of these forms;

- Language seen as derogatory, demeaning, inflammatory;
- Unwanted banter;
- Sexual harassment;
- Sexual Violence;
- Hate;
- Homophobia, including that based on transgender dynamics;
- Based on gender differences and orientation (LGBTQ+);
- Based on difference, including religious and cultural diversity.

We also aim to use approaches in the curriculum to address and tackle occurrences of peer on peer abuse, e.g. PSHE and therapeutic approaches.

The criminal exploitation of children: County Lines

Signs which may indicate criminal exploitation can include:

- 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
- 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
- Criminal exploitation of children is a safeguarding concern and will require a discussion with the Designated Safeguarding Lead who will seek advice from agencies and professionals; including, reference to the Safeguarding procedures as outlined by the All-Wales Procedures.

Recruitment

Aran Hall is committed to the principles of safer recruitment and, as part of that, adopts recruitment procedure that help deter, reject and/or identify people who might pose a risk to children. (See Policy 414 Recruitment Selection Policy)

Safe recruitment process are followed as per the [Welsh Governments Keeping Learners Safe Guidance](#). All relevant members of staff who are involved in recruitment will undertake safer recruitment training.

The school ensures that at least one person on any appointment panel has undertaken the above training.

Safeguarding Vulnerable Adults

SENAD establishments have a “*person centred*” focus which promotes the well-being of young people in their care. A vulnerable adult is a person aged 18 or over who is or may be in need of community care services by reason of mental health or other disability, age or illness and who is, or may be unable to take care of him/herself or unable to protect him/herself against significant harm or exploitation.

Categories of Abuse

1. Physical Abuse
2. Emotional Abuse **including suspected radicalisation**
3. Sexual Abuse
4. Neglect
5. Financial Abuse

Therefore, concerns about vulnerable adults can arise in a number of ways:

- Concerns about a Post 18 child in an establishment;
- It may become clear that a parent/carer of a young person has difficulties which need attention and possible referral;
- Colleagues/members of staff who could be vulnerable because of circumstances in their own life, however private.

The Procedure for dealing with concerns about vulnerable adults is similar for young people in that the same steps are taken to ensure appropriate outcomes are reached.

Specific Circumstances and Considerations

From time to time it may be that there are concerns or early indications about a number of more complex issues, all of which will need a robust response and the appropriate use of SENAD policy, supported by local procedures to ensure best practice is followed:

- Allegations against members of staff (present or past) – these should be taken very seriously and never dealt with alone or internally. Historical allegations of abuse will be treated with the same attention and care as those against current staff.

- **Allegations against senior staff should always be raised with SENAD as proprietor and the issue will be automatically referred to the Local Safeguarding Board and CIW/Estyn.**

- Domestic Abuse – any young person or living with or who is subject to domestic violence or abuse will be vulnerable and could be in danger of being harmed physically and/or emotionally. If there are young people as part of that household the matter becomes even more serious and needs a quick response
- Institutional abuse: - it is possible that any of the SENAD establishments could be negligent in their duty of care towards those young people using the service:
 - Cultures of bad practice that go unaddressed
 - Neglect of children in attending to their day to day needs
 - Emotional abuse of children in the way they are treated and shown a lack of respect, dignity, warmth and care
 - Inappropriate use of any physical intervention
 - Management styles which make staff and children feel bullied and fearful
 - Misuse of monies – e.g. pocket money, personal allowances, DLA - Neglectful or intentional medication administration
- Bullying – bullying is referred to as a form of emotional abuse in “Working Together to Safeguard Children” (2018); as well as on-line bullying. There is clear evidence that it is abusive and will include at least one or more of the defined categories of abuse. (see also SENAD Anti-bullying Policy **502**)
- Mental health – young people with mental health problems need special assessment and support and inevitably external assistance. SENAD have significant resources to support young people with mental health problems and will ensure suitable and appropriate care is provided.

Procedure for Dealing with Safeguarding Concerns

Duty of Care

Every member of staff has a duty of care toward a young person to safeguard and promote their welfare. This duty of care requires them to pass on a concern for further attention and assessment. This duty is a legal duty as per Common Law and made clearer within the Children Act 1989 for all professionals who work with young people.

That duty of care does not end simply because a concern has been passed on to someone else. It cannot be assumed that having passed it on, it has been dealt with.

The duty of care in responding to a concern involves getting feedback about exactly what has happened with the concern

Whatever the circumstances of the concern, all matters will be reported as per SENAD procedures. Failure to report any concern will be seen as a disciplinary matter as it will be clear that a young person may be left vulnerable or in further danger.

When is a concern a concern?

Some concerns are dealt with on a day to day basis. A specific incident may be deemed an “incident” and dealt with accordingly. However, a concern needs to be passed on when:

- A concern is persistent
- Despite day to day management, the concern is not being addressed or changed
- An incident has a safeguarding component
- **Has radicalisation dimensions, even if a ‘one-off’ occurrence**
- Staff feel that a concern needs a more thorough robust assessment by senior managers
- The concern is having a detrimental effect on a child and/or others

The Golden rule is – if in doubt tell someone!

The Aran Hall Procedure

Aran Hall School uses an Incident Form on Clearcare; all staff at Aran Hall School and allied Children’s Home have access to it.

This is the official form for the recording of concerns, no matter how slight or uncertain. It is also the official record of how the concern has been addressed. The form should be completed for niggling concerns as well as more definite problems.

Where there is more than one young person subject to the concern a separate incident form should be completed with cross references to any other young person involved.

The form should be held centrally by the appropriate **Named Person, that is Andy Pryer-Smith**, for Safeguarding in a manner that allows staff to access information in the future should they have fresh or further concerns about a young person. Consideration needs to be given to the appropriate storage and security for all information as per the Data Protection Act.

Responding to a Concern

Step One: ***Keeping the child or young person safe***

The first priority must be to keep the individual young person safe and protect any other people from harm.

- Remove the threat of any physical or emotional harm
- Report to your line manager at the **first** opportunity (*this means irrespective of holidays/weekends. Safeguarding never goes on ‘holiday’*)

- *If this is suspected radicalisation, the local safeguarding manager will **automatically contact** Mark Ryder or Suzanne Pennington for direction. They will ensure that safeguarding is involved at an early stage as radicalisation may go wider than just the safety of the school/home.*

Step two: *Identifying the concern*

Gather as much information as is possible, after discussing with your line manager (if appropriate) but **DO NOT INVESTIGATE THE MATTER**. Never stop a young person talking

AND ALWAYS WRITE UP AS ACCURATELY AS POSSIBLE ANYTHING SAID AS SOON AS PRACTICABLE.

Gather information from:

- The young person in a natural, informal way without formal interview
- Other colleagues where this can be done without delay
- Previous records i.e. any other safeguarding forms to indicate previous concerns

Complete the appropriate sections on the **Clearcare** Incident Form.

Report the concern to the appropriate line manager or someone who has senior management responsibility within the same working day;

Practice guidance:

- Do not promise to keep anything confidential
- Do not attempt to sort out the concern alone
- Try and explain, where possible, what is happening next to the young person
- **ALWAYS WRITE UP AS ACCURATELY AS POSSIBLE ANYTHING SAID AS SOON AS PRACTICABLE**
- Do not contact parents until discussed with line managers
- Ensure there are no immediate dangers to the young person/others
- Consider medical attention if appropriate
- **Do not ask any leading questions**

Step Three: *Analysis of the concern*

It is the responsibility of the manager to analyse the information (without conducting an investigation that may compromise a police investigation) ensuring that:

- No young person is in immediate danger
- No other young people are affected
- Immediate actions are considered to ensure the needs of the young person are addressed

It is **ESSENTIAL** that the manager completes the appropriate section of the Clearcare Incident Form to assist senior managers in determining outcomes.

An identified manager will assist the originating member of staff to know how to support the young person in the immediate time after the concern has been raised.

The concern will be passed to a member of the senior management team within the same day.

Practice Guidance:

- Support the staff in acknowledging the concern and being committed to progressing it
- Consider contact with parents/carers only if it will not put the young person at further risk
- Consider all aspects of the young person's day to day care in the light of the concern
- Consider the impact on the member of staff and offer appropriate support
- Ensure the Clearcare Incident Form is completed to reflect the analysis in detail

Step Four: ***Decision-making by Senior Management Team***

There are a number of options that senior management will decide upon.

(i) Monitor *the young person's wellbeing which might mean increased support*

This should only be agreed if:

- There are no immediate risks to the individual or any other young person
- The home is able to manage effectively the concerns as part of a plan which can be subject to a review timescale
- There are no reasons to involve Social Care or other agencies
- This decision should always be fed back to staff with absolute clarity and within three working days. It is important to determine exactly what staff are monitoring and to be specific as to how they do this

(ii) Child Protection

This will be agreed if:

- The child has suffered or is likely to suffer significant harm
- The child has made a disclosure of abuse
- Information indicates other young people are at risk

A member of the senior management team will make the referral to the appropriate Safeguarding Team (following local procedures) immediately or the out of hours teams at weekends or during bank holidays.

Feedback Processes and support for staff

Feedback should be given to the originating member of staff within three days of the concern first being identified. This is essential so that further contact with the child is sensitive to any outstanding issues or concerns.

However, if the feedback is not forthcoming for any reason, then the originating member of **staff must chase that feedback** within reasonable timescales **and have the right to escalate the notification to SENAD.**

Support should be offered to the originating member of staff who identified the concern by their line manager. This could include the Employee Assistance Programme details, additional supervision or a discussion with an appropriate person.

The senior management team must meet regularly to consider any safeguarding issues and to ensure action is taken promptly.

Procedures for Dealing with Urgent and Serious Situations

In some situations, there may be a need to respond to an urgent and serious situation. All staff should in these circumstances understand their duty of care to seek immediate help from the Police and/or Social care without delay. It may be necessary to call emergency services if the young person's health is in danger as well as other appropriate agencies.

Any concerns about the practice of contractors must be reported immediately and appropriate action taken, in serious cases this will be asking a contractor to leave the home.

Escalation Procedures

If a concern is not taken seriously by the line manager, staff must take that concern immediately to a member of the senior management team without delay.

If the concern is about a **senior member of school's staff/home**, then it must be **referred to Mark Ryder or Suzanne Pennington of SENAD** and directly to Gwynedd & Anglesey Local Safeguarding Children Board (LSCB) 01766 772577 (or 01248 353551 outside office hours)

If a concern is still not taken seriously or the decided action is felt not to be in the young person's best interests, staff must contact

Mark Ryder

Director of Children's Social Care

Suzanne Pennington

Director of Education

Both are contactable via Vernon Gate (SENAD Head Office) on 01332 378840 or via notify@senadgroup.com

Or Social Care- CIW/Estyn directly.

Estyn (for Aran Hall School)

Anchor Court
Keen Road
Cardiff
CF24 5JW

Contact safeguarding@sharepoint.estyn.gov.uk

Telephone Office 02920 446 446 or 24 hours 02920 446 482/484

CIW North Wales Region, (for Aran Hall School Children's Home)

Government Buildings,
Sarn Mynach,
Llandudno Junction
LL31 9RZ

Tel: 0300 7900126 Email: CIW@gov.wales

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| Gwynedd & Anglesey Local Safeguarding Children Board |
| Gwynedd Council, Shirehall Street, Caernarfon, LL55 1SA |
| Out of Hours 01248 353 551 Abuse suspected contact nos: 01766 772577 childreferral@gwynedd.gov.uk cyfeiriadauplant@gwynedd.llyw.cymru Board Manager: 01286 679 926 |
| North Wales Safeguarding Board www.northwalessafeguardingboard.wales/ |

Allegations against a Current or Ex Member of Staff, Contract Worker or Volunteer

Allegations against members of staff are given the utmost priority. (See also Policy 418)

Allegations can come in any forms:

- Concerns of an unspecified nature – a niggling concern- about the conduct of a member of staff
- Concerns or views expressed via the internet/Email/Face Book/Instagram or equivalent social media or via telephone texting
- Allegations about a member of staff's general poor or unprofessional attitude to a young person, another member of staff or the general ethos of SENAD;
- Allegations of inappropriate and unprofessional behaviour – swearing, gossiping, using sexual language, especially when young people can hear and witness such behaviour;
- Allegations of inappropriate boundaries between staff and young people– too familiar relationships, keeping in touch with past young people, rewarding a young person, favouring a young person
- Allegations of offensive descriptions of young people and their disability and/or other staff members;
- Allegations of abuse of harm against a young person;
- Racial comments in any form, including inappropriate reference to colour, creed, religion or culture
- Inappropriate views expressed about someone's sexuality
- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.

All such concerns should be passed without delay to your immediate line manager or a senior member of staff if the concern is in relation to the line manager.

Whatever the route the concern must be taken to a senior member of staff for immediate action or to SENAD.

Immediate decisions will need to be made about suspension or other action necessary to safeguard the welfare of others and the member of staff themselves.

The home will respond according to the appropriate disciplinary procedure. All concerns will be passed to SENAD no matter what their nature.

Any concerns about the practice of contractors must be reported immediately and appropriate action taken. In serious cases this will include asking the contractor to leave the home and the reporting of conduct to the safeguarding team/Police.

The local safeguarding team should be consulted about the involvement of medical professions in the case of any physical, sexual allegations or radicalisation.

Making Referrals to Social Care

Social Care Children's services should be contacted in a number of circumstances:

- Where a young person has a social worker already, all concerns should be notified to that social worker; if they cannot be contacted do not leave a message; the referral of concern must be discussed with a duty social worker or team manager in the first instance.
- When general advice needs to be sought to assist in determining how best to proceed with a concern. This does not need to involve making referral;
- In requesting /sharing information that might be relevant to an assessment or support of a young person
- Making a formal referral

The threshold for referring for help and support is usually when the young person's health and development would be impaired without the provision of Local Authority services. The threshold for child protection is when someone has suffered or is likely to suffer significant harm or is at risk of such.

It will be important to be clear in what capacity the referral is being made.

Considerations before referral should be:

- If the contact with social care is for advice only, consent from parents/carers or the young person is not necessary;
- If the contact is to make a formal referral for help and support services (Children in Need), parents/carers should be asked for consent to make the referral unless to do so would put the young person further at risk or jeopardize the ability to keep the young person safe;
- If the referral involves more specific child protection matters, it is not necessary to gain consent unless it is felt the relationship with the family is such that openness will help to secure an outcome.

However, sexual, emotional, physical or neglect abuse concerns should NEVER be discussed with the family nor is consent needed to make a referral for such. The issue MUST be addressed by the Local Safeguarding Board and/or Police.

Making the Referral – Practical Steps

The contact should be made with Social Care team where the alleged incident took place whether in school, at home or in public. It is essential that the local Social Care team for the home are informed if the incident did not happen in a SENAD establishment.

Each establishment is accountable to the Local Safeguarding Children Board procedures and if in any doubt as to where to make the referral, the local team should be contacted

Take the name of the person from Social Care and make a note of the time and date on which the conversation occurred. It will be important to be clear about:

- The nature of the concern including the date(s) and time(s)
- The source of the concern and how it occurred
- A view as to the impact of that concern on the child
- A view as to what course of action might assist the child

Ensure that there is clarity about what steps will be taken and when Social Care will come back with further information.

The possible outcomes for assessment by Social Care might be

- Ask the school to monitor – in which case ensure that there is an agreed monitoring plan. The discussion needs to involve what is being monitored and when the concerns should be re-referred if necessary;
- Undertake an initial assessment – this has to involve the young person being spoken to by Social Care as well as the referrer.

Considerations of Equality and Diversity

Consideration should always be given to the diverse needs of the young person and their family. The cultural, religious, gender, sexuality and disability needs of each young person should form a central part of their care plan. It will be essential to ensure that these considerations do not distract staff from keeping the welfare of the young person paramount:

- Do not consider a behaviour or attitude as normal and therefore fail to respond;
- Do not let a lack of understanding of diversity cause a “*benefit of the doubt*” response and fail to respond;
- Seek help and support to ensure assumptions and myths are not influencing decision making.
- Give extra consideration when English/Welsh is not the first language of the person you are speaking to, to avoid confusion
- Do consider the impact of any disability

Due consideration should be given to equality legislation, but should not over ride safeguarding concerns.

Some Equality legislations which might be relevant are;

- ✚ Race Relations Act 1976 (Amendments) Regulations 2003
- ✚ Human Rights Act 1998
- ✚ Equalities Act 2010 (replaces the Disability Discrimination Act 1995)

Please also refer to the SENAD Equality & Diversity Policy and Procedure. (Section 4 Policy 408)

Related Policies

This policy should be read in conjunction with the following SENAD Policies:

- Safeguarding ADULTS 506A
- Anti-Bullying Policy 502
- E-Safety Policy 510
- SENAD Equality & Diversity Policy 408
- Recruitment 414
- Positive Behaviour Support Policy 515
- The Use of Physical Interventions 516
- Reducing exposure to Radicalisation & Extremism 518
- Privacy 517
- Intimate Care 610
- The Use of Sanctions 520
- Complaints Policy 714
- Significant Harm 524
- Staff Conduct 614
- Allegations Against Staff 413
- Social Media Policy 421
- This policy should be read in conjunction with the All Wales Safeguarding Procedures – Available online at the following web address:
(<https://www.safeguarding.wales/>)

Further useful information, support and advice in relation to safeguarding and child protection can be found at: <https://www.northwalessafeguardingboard.wales> as well as individual placing authority guidance.