

**ML COMMUNITY ENTERPRISE**

**SAFEGUARDING POLICY AND PROCEDURES**

2021

<b>Section no</b>	<b>Contents</b>	<b>Page no</b>
	<b>INTRODUCTION</b>	<b>4</b>
<b>1.0</b>	<b>SECTION ONE</b>	<b>5</b>
	Safeguarding and promoting the welfare of children policy	
	1.1 Principles	
	1.2 Legal Framework	
	1.3 Accountability & Responsibility	
	1.4 Definitions	
	1.41 Safeguarding	
	1.42 Children	
	1.43 Welfare	
	1.44 Child in Need	
	1.45 What is Significant harm	
	1.46 Child Abuse	
	1.47 Child Protection	
	1.48 Radicalisation	
	1.5 Adults working with children	
	1.51 Definition	
	1.52 Abuse of Trust	
	1.53 Allegations against MCLE staff	
	1.54 False Allegations	
<b>2.0</b>	<b>SECTION TWO</b>	<b>10</b>
	Roles and responsibilities for safeguarding in the work of MCLE	
	2.1 Non-Executive Directors	<b>10</b>
	2.2 Co-CEO	<b>10</b>
	2.3 MLCE's Designated Safeguarding Person	<b>10</b>
	2.4 MLCE	<b>11</b>
<b>3.0</b>	<b>SECTION THREE</b>	<b>11</b>
	Procedures	
	3.1 What to do if you have a concern about a child	<b>11</b>
	3.2 What to do if a child discloses to you	<b>11</b>
	3.3 The procedure for disclosure	<b>11</b>
	3.4 Health & Safety issues and safeguarding of children	<b>12</b>

<b>4.0</b>	<b>SECTION FOUR</b>	<b>14</b>
	Conducting a Risk Assessment	
	4.1 Definition	<b>14</b>
	4.2 Purpose	<b>14</b>
	4.3 Procedures for risk assessment	<b>14</b>
	4.4 What to do if an allegation is made against a MLCE member of staff	<b>14</b>
	4.5 What to do if an allegation is made against a worker in their personal life	<b>15</b>
	4.6 What to do if there are concerns about the way another agency responds to a child protection issue.	<b>16</b>
<b>5.0</b>	<b>SECTION FIVE</b>	
	Training	<b>17</b>
	5.1 All staff and lead Non-Executive Director	<b>17</b>
	5.2 Staff	<b>17</b>
	5.3 Volunteers	<b>17</b>
	5.4 CYPF Manager, EET Manager and the Programme Co-ordinator	<b>17</b>
	5.5 Lead Non-Executive Director	<b>17</b>
<b>6.0</b>	<b>Monitoring</b>	<b>18</b>
	6.1 DBS checks	<b>18</b>
	6.2 Session Recording Sheets	<b>18</b>
	6.3 Cause for Concern forms	<b>18</b>
	6.4 Report to Managers	<b>18</b>
	6.5 Report to Non-Executive Directors	<b>18</b>
	6.6 Monitoring of training by Managers	
<b>7.0</b>	<b>Information Storage &amp; Sharing</b>	<b>18</b>
	7.1 MLCE responsibilities	<b>18</b>
<b>8.0</b>	<b>Safe working</b>	<b>19</b>
	<b>8.1 Procedures</b>	<b>19</b>
	<b>8.2 Safe working with children in a one to one situation</b>	<b>19</b>
<b>9.0</b>	<b>Appendixes</b>	<b>21</b>
	<b>Appendix 1</b> — Safeguarding and Child Protection Named Staff	<b>21</b>
	<b>Appendix 2</b> — Safeguarding Children and Young People Vulnerable to Violent Extremism (PREVENT DUTY)	<b>22</b>
	<b>Appendix 3</b> — Female Genital Mutilation (FGM)	<b>23</b>
	<b>Appendix 4</b> — Gangs and County Lines / Serious Youth Violence	<b>25</b>
	<b>Appendix 5</b> — Guide for dealing with concerns relating to child abuse	<b>27</b>
	<b>Appendix 6</b> — Who is the Designated Safeguarding Person for concerns relating to children?	<b>28</b>
	<b>Appendix 7</b> — Outline Safeguarding Reporting Concerns Procedure	<b>29</b>
	<b>Appendix 8</b> — MLCE Safeguarding Main Responsibility Structure	<b>30</b>

## **INTRODUCTION**

ML Community Enterprise is committed to working and improving the safeguarding and to promote the welfare of children and young people. This is in line with Section 11 of the Children's Act 2004 and the 2018 Working Together to Safeguard Children Guidance.

All the advice and recommendations included in this document are based on and compliant to the London Child Protection Procedures 2017.

The document has roles and responsibilities, for the board of non-Executive Directors, management, staff, sessional staff, volunteers and associated partner agencies. There is also guidance on policy information sharing, training, monitoring.

### **Related policies and procedures**

This policy document should be read alongside our organisational policies and procedures, including:

- Safer recruitment policy and procedures
- Adult to child supervision ratios
- Code of conduct for staff and volunteers
- Anti-bullying policy and procedures
- Online safety policy and procedures for responding to concerns about online abuse
- Photography and image sharing guidance
- Child protection records retention and storage policy
- Whistleblowing policy

# Section 1

## SAFEGUARDING & PROMOTING THE WELFARE OF CHILDREN POLICY

<b>1.0</b>	<b>POLICY</b>
<b>1.1</b>	<b>Principles</b>
	<ul style="list-style-type: none"> <li>o The welfare of children is paramount</li> <li>o Children have a fundamental right to be protected from harm.</li> <li>o Children and their parents/carers have a right to expect MLCE to provide a safe and secure environment.</li> </ul> <p><b>Children have said they need the following from an effective safeguarding system:</b></p> <ul style="list-style-type: none"> <li>• Vigilance: to have adults notice when things are troubling them</li> <li>• understanding and action: to understand what is happening; to be heard and understood; and to have that understanding acted upon</li> <li>• Stability: to be able to develop an ongoing stable relationship of trust with those helping them</li> <li>• Respect: to be treated with the expectation that they are competent rather than not</li> <li>• Information and engagement: to be informed about and involved in procedures, decisions, concerns and plans</li> <li>• Explanation: to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response</li> <li>• Support: to be provided with support in their own right as well as a member of their family</li> <li>• Advocacy: to be provided with advocacy to assist them in putting forward their views</li> <li>• Protection: to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee</li> </ul> <p style="text-align: right;">(Extract from Working Together to Safeguard Children 2018)</p> <p>The above identified needs will guide the way in which MLCE staff and volunteers implement safeguarding.</p> <p>MLCE believes that children have the right to be:</p> <ul style="list-style-type: none"> <li>▪ Protected from neglect, abuse and exploitation and to be safe</li> <li>▪ To have the opportunity to achieve their full potential</li> <li>▪ To have their needs determined and met</li> <li>▪ To be listened to, be believed and have their views be given careful consideration</li> <li>▪ To be respected and understood in the context of their own cultural, religious and ethnic origin.</li> </ul>
<b>1.2</b>	<b>Legal Framework</b>
	<p>The policy is written in the wider context of the Children Act 1989 and 2004, provisions of section 175 of the Education Act 2002, Working within the Sexual Offences Act 2003 and the Counter Terrorism and Security Act 2015. It also takes account of the Working Together to Safeguard Children 2018, Guidance and the Safeguarding Children and Young People Vulnerable to Violent Extremism (PREVENT DUTY 2015) Guidance. See Appendix. It places specific child protection procedures in the context of the wider safeguarding agenda.</p>

<b>1.3</b>	<b>Accountability and responsibilities</b> (see flow chart Appendix 8)
	<p>This policy applies to all non-Executive Directors, staff, session workers and volunteers working for MLCE recognising that all levels of the organisation should take responsibility for safeguarding children and that there should be clear accountability within the organisation.</p> <p>On a day to day basis all staff are accountable because of their frequent and regular contact they have with children. However, responsibility for safeguarding children and child protection does not lie solely with frontline staff, ultimately the non-Executive Directors and Co-CEO take responsibility for ensuring the safety of children.</p> <p>MLCE is committed to ensuring that all staff have access to appropriate supervision and training.</p> <p>MLCE will ensure allegations against staff professionally and personally are taken seriously and investigated in the most appropriate way.</p> <p>MLCE will cooperate with the 3 statutory Safeguarding Partners (the Local Authority, Clinical Commissioning Group and the Police to ensure the safeguarding of children.</p> <p><b>Safer Recruiting</b></p> <p>All staff and volunteers working with children and vulnerable people accessing MLCE facilities and activities will be checked through the Disclosure and Barring Service. Volunteers will be subject to the same code of conduct as paid employees.</p>
<b>1.4</b>	<b>DEFINITIONS</b>
<b>1.41</b>	<b>Safeguarding</b>
	Safeguarding to means
	<ul style="list-style-type: none"> <li>○ Protecting children from maltreatment</li> <li>○ Preventing impairment of children’s health and development</li> <li>○ Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care</li> <li>○ Taking action to enable all children to have the best outcomes.</li> </ul>
<b>1.42</b>	<b>Children</b> For the purpose of this policy children are defined as those aged under 18.
<b>1.43</b>	<b>Welfare</b> Welfare is defined in the Children Act 1989 in terms of children’s health and development, where health means physical and or mental health. Development means physical intellectual, emotional, social or behavioural development This holistic approach to safeguarding also encompasses the 5 outcomes of the Changing for Children Agenda

	<p>The Children Act has outlined these as</p> <ul style="list-style-type: none"> <li>○ Physical and mental health and emotional wellbeing (be healthy)</li> <li>○ Protection from harm and neglect (staying safe)</li> <li>○ Education training and recreation (enjoying and achieving)</li> <li>○ Making a positive contribution to society</li> <li>○ Social and economic well being</li> </ul>
<p><b>1.44</b></p>	<p><b>A Child in need</b></p> <p>This is defined in the Children Act 1989, they are those children whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development or their health and development will be significantly impaired, without the provision of services (including disabled children).</p>
<p><b>1.45</b></p>	<p><b>What is Significant harm</b></p> <p>This definition was introduced in the Children Act 1989 as a threshold that justifies compulsory intervention in family life in the best interests of children. Some children are in need because they are suffering or likely to suffer significant harm. Decisions about significant harm are complex and involve careful assessment.</p>
<p><b>1.46</b></p>	<p><b>Child abuse</b></p> <p>Child abuse is a general term used about situations where the child may experience ill treatment or impairment of development. This may occur in a number of different settings including the home. It may include both actions and omissions on the part of parents and carer, but other close family members or friends may be involved.</p> <p>Child abuse is normally defined under one or more of the following headings.</p> <ul style="list-style-type: none"> <li>▪ Physical abuse</li> <li>▪ Neglect</li> <li>▪ Sexual abuse</li> <li>▪ Emotional abuse</li> </ul> <p>It is important to recognise that abuse is a multi-faceted concept and many children who have been abused will have experienced more than one form of abuse. Children can be put at risk of harm by a variety of behaviours. This list is not exhaustive but can include: domestic violence; drug and alcohol abuse; female genital mutilation; forced marriages; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation.</p>

1.47	<p><b>Child Protection</b></p> <p>The term used to describe the responsibilities and activities undertaken to prevent or stop children being abused or ill-treated.</p>
1.48	<p><b>Radicalisation</b></p> <p>“Radicalisation” refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. During that process it is possible to intervene to prevent vulnerable people being drawn into terrorist-related activity.</p>
1.5	<p><b>ADULTS WORKING WITH CHILDREN</b></p>
1.51	<p>Definition</p> <p>MLCE recognises that whilst child abusers may be relatives or friends of the family, some meet children in other contexts and some of these may gain access to children in a range of environments. We will work to ensure a culture that supports staff and children to feel confident about reporting concerns.</p>
1.52	<p><b>Abuse of Trust</b></p> <p>MLCE recognizes the need for staff to maintain appropriate boundaries in their dealings with children. Intimate or sexual relationships between staff and children will be regarded as a grave breach of trust. Sexual activity between a member of staff and a child under 18 years of age may be a criminal offence.</p>
1.53	<p><b>Allegations against MLCE staff</b></p> <p>Given their daily contact with children in a variety of situations, including the wider caring role, staff are vulnerable to accusations of abuse. Their relationships with children generally may lead to allegations against them by children, parent(s) or other members of staff.</p> <p>The paramount concern is that the child should be safeguarded from all forms of harm. This means that the protection of children takes precedence over other issues including disciplinary procedures.</p> <p>Allegations may be false, malicious or misplaced and may be either deliberate or innocent of such intent. Regardless of the motives underlying any allegations, MLCE always take any allegations seriously and they will be investigated impartially.</p> <p>MLCE will work very closely with schools and/or relevant agencies or where the allegation has taken place.</p>
1.54	<p><b>False Allegations</b></p> <p>Where following initial consideration by the school or agency and MLCE that the allegation is demonstrably false by virtue of the fact that the immediate circumstances of the allegation show that it would not be possible for the allegation to be true, then the matter can be dealt with at school level.</p> <p>However, in these circumstances, it should be borne in mind that if a child has made an obviously false allegation, this may well be a strong indicator of abuse elsewhere which requires</p>

	<p>further exploration. The issues will be discussed with the designated lead and MLCE Co-CEO. If necessary, a referral will be made. The allegation may indicate inappropriate behaviour or poor practice by a member of staff which needs to be considered and acted upon if necessary. This may include the need for further training.</p>
--	---

## Section 2

### Roles and responsibilities for safeguarding in the work of MLCE

<b>2.0</b>	<b>Roles and Responsibilities</b>
<b>2.1</b>	<p><b>Non-Executive Directors</b></p> <ul style="list-style-type: none"> <li>• All Non-Executive Directors are responsible must take reasonable steps to protect people who come into contact MLCE from harm</li> <li>• A lead Non-Executive Director will be appointed who has a monitoring role and responsibility to ensure the organisation is following good practice and that policies are up to date</li> <li>• The Lead Non-Executive Director will work with the Co-CEO on a yearly report to Non-Executive Directors</li> </ul>
<b>2.2</b>	<p><b>Co-CEO</b></p> <ul style="list-style-type: none"> <li>• Responsible for investigating allegations against staff unless it is about himself/herself (these investigations to be consistent with disciplinary procedures)</li> <li>• Work with Lead Non-Executive Director to produce a yearly report</li> <li>• Supports and advises line managers</li> <li>• Monitors safeguarding work</li> <li>• Ensures training is recorded and is up to date and regular for Non-Executive Directors, staff, sessional workers and volunteers.</li> </ul>
<b>2.3</b>	<p><b>Designated Safeguarding Person(s)</b></p> <p>It is the Designated Safeguarding Person's (DSP) responsibility to:</p> <ul style="list-style-type: none"> <li>• Keep all staff and sessional workers updated with current safeguarding procedures</li> <li>• Provide advice and support to partner staff e.g. schools and Children's Centres</li> <li>• Refer any concerns as soon as they arise to relevant Social Services Department (SSD)</li> <li>• Monitor the development of children on the child protection register and inform the relevant Social Worker or SSD</li> <li>• Ensure that all relevant information about a child or vulnerable adult at risk is disseminated to appropriate staff or sessional worker within MLCE</li> <li>• Maintain accurate and secure safeguarding records</li> </ul> <p>Investigate any allegation made against MLCE staff or sessional worker and to inform the MLCE CO-CEO immediately.</p>

<b>2.4</b>	<b>MLCE</b>
	<p>MLCE must have policies and procedures which reflect the roles of staff and parents regarding:</p> <ul style="list-style-type: none"> <li>• Child protection</li> <li>• The use of force to restrain children</li> <li>• Identification and response to bullying</li> <li>• Identification and response to racism</li> </ul> <p>MLCE staff and sessional workers will adhere to the policies of the schools, Community Centres and Adventure Playgrounds where they are based and understand them.</p> <p><b>All sites must have a designated member of staff</b> with responsibility for safeguarding. This is either the Co-CEO or another senior member of staff.</p> <p>The guidance from DFES states clearly that the designated member of staff must have the status and the authority within the management structure to carry out the duties of the post including committing resources and where appropriate directing other staff. A deputy should also be appointed to act in the Designated Safeguarding Person’s absence.</p>

### SECTION 3

<b>3</b>	<b>PROCEDURES</b>
<b>3.1</b>	<p><b>What to do if you have a concern about a child?</b></p> <ul style="list-style-type: none"> <li>• Always record your concerns <b>factually</b> (they could be used as evidence at a later date). This should include in daily records and personal notes.</li> <li>• Always share your concerns however insignificant with the Designated Safeguarding Person at MLCE or site you are based at at the time of the disclosure.</li> <li>• Let the MLCE programme manager and/or the Co-CEO know of the situation as soon as possible.</li> </ul>
<b>3.2</b>	<p><b>What to do if a child discloses to you?</b></p> <p>A disclosure is the term used when a child tells about an abusive situation.</p> <p>Your role is to listen. You have to make it clear to them that you cannot keep the information to yourself. It is important when you begin any work with a child or vulnerable adult that you establish boundaries around confidentiality and explain clearly what information you will have to share and who you will share it with.</p>
<b>3.3</b>	<p><b>The procedure is as follows</b></p> <p>If a child discloses information about an abusive situation or says they want to tell you something which is a ‘secret’ or ‘confidential’</p> <ul style="list-style-type: none"> <li>○ Make it clear that if you think what they have told you means they could come to harm, you will have to tell the Designated Safeguarding Person. Be absolutely clear that you cannot promise complete confidentiality.</li> </ul>

- The child may ask more questions, at this point you should explain MLCE's procedures in an appropriate way
- If the child continues with the disclosure you will need to accurately document as early as possible:
  - date
  - time
  - place
  - anyone else present
  - Accurate factual notes on what the child said, if possible, write down verbatim what the child said. (These may be used in court later).
  - Any questions you may have asked

It is important to be as empathetic and supportive of the child so that they feel comfortable to talk.

**DO NOT**

- Ask leading questions if you need to ask questions for clarification ensure they are open questions.
- offer opinions
- offer solutions

If a child discloses information **without warning** or indication of the nature of the information that they are going to give you may not have a chance to remind him/her that you cannot keep it confidential. You must tell the child as soon as possible. This may make the child retract their statement. However, you are still obliged to pass this information on to the Designated Safeguarding Person at MLCE.

If after hearing the information about confidentiality the child decides not to tell you, you must respect this however it is important to

- Reassure the child that they can come back at any time to discuss the issue
- Monitor the situation
- Raise the issue with the Designated Safeguarding Person at MLCE.

When the child has finished giving information pass it on to the Designated Safeguarding Person at MLCE as soon as possible, if they are not available pass the information to the Co-CEO if you feel the matter is urgent. If you think the child is at risk of immediate harm, then ensure the Designated Safeguarding Person at MLCE knows of this and takes action.

- Try and ensure that the child understands what is happening.
- Write up your notes as quickly as possible ensuring they are factual and clear and give a copy to the Designated Safeguarding Person.
- Notes relating to safeguarding are confidential and should be kept with other

	<p>records relating to the safeguarding. However you need to keep a copy.</p> <ul style="list-style-type: none"> <li>You should not discuss the disclosure with other staff at MLCE unless requested to by the Designated Safeguarding Person.</li> </ul> <p><b>What happens next?</b></p> <p>You should ensure that your line manager and/or the CO-CEO and Designated Safeguarding Person at MLCE are aware that you have become involved in a child safeguarding issue as soon as possible.</p> <p>After a disclosure you may feel shocked or upset. Disclosures are held in confidence and not for general discussion you may feel the need to talk to someone, in this case it would be appropriate to:</p> <ul style="list-style-type: none"> <li>Talk to the Designated Safeguarding Person</li> <li>Talk to the Co-CEO at MLCE</li> </ul>
<p><b>3.4</b></p>	<p><b>Health and Safety issues and safeguarding of children</b></p> <p>Staff should always take great care to ensure that they follow good practice in home visiting and one to one work with children.</p> <p>See Appendix IV for more detailed guidelines.</p>

## SECTION 4

### GUIDANCE FOR THE LEAD WORKER

<b>4.0</b>	<b>CONDUCTING A RISK ASSESSMENT</b>
<b>4.1</b>	<p><b>Definition</b></p> <p>The aim of a risk assessment is to minimise any risk or hazards to children or staff during the delivery of our services.</p> <p>A risk assessment is a simple but careful examination of what, in the workplace, could cause harm to others and the potential likelihood and impact. The appropriate staff member will weigh up whether enough precautions and procedures have been put in place to minimise risk.</p> <p><b>4.2 Purpose</b></p> <p>Children and staff have a right to be protected from harm caused by a failure to take the reasonable control measures.</p> <ul style="list-style-type: none"> <li>• <b>Activity based</b> – each activity will be risk assessed in accordance with the particular hazards and risks identified and the age range of children engaging in the activity.</li> <li>• <b>Centre based</b> - each centre will be risk assessed in accordance with the particular hazards and risks identified and the age range of children using the centre.</li> </ul> <p><b>Disclosure based</b> - each disclosure will be risk assessed in accordance with the particular hazards and risks identified.</p> <p><b>4.3 Procedures for risk assessment</b></p> <p>All risk assessments will be carried out by either the Lead Worker or an appropriately trained member of staff.</p> <p>The identified risk will be evaluated and recorded, in the case of disclosures the risk assessment will be sent to the funding body and Lambeth Safer Recruitment Team for further guidance.</p>
<b>4.4</b>	<p><b>What to do if an allegation is made against a MLCE member of staff (see Appendix 7)</b></p> <p>This guidance follows closely procedures in Working Together to Safeguard Children 2018.</p> <p>The following paragraph describes the procedures for MLCE.</p> <p>If an allegation is made against an MLCE member of staff or anyone working for MLCE, the Co-CEO should be notified immediately. The Co-CEO will then inform the Non-Executive Director Safeguarding Lead and the worker’s line manager.</p> <p>The Co-CEO and Non-Executive Directors will take responsibility for managing the process.</p> <p>This guidance will be used in cases where an allegation has been made against a person who works with children that they:</p>

- Behaved in a way which harmed a child or vulnerable adult or may have harmed a child
- Possibly committed a criminal offence against or related to a child: or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to child.

All allegations will be followed up and the Lambeth Local Authority Designated Officer will be informed of any allegations that come to MLCE's attention. MLCE will continue to liaise closely with the Local Authority designated officer in all matters that follow. This will all be done in close liaison with the MLCE's Designated Safeguarding Person and the non-Executive Director.

After discussion with the Local Authority Designated Officer, and when a decision has been made about next steps, MLCE will inform the worker that an allegation has been made against them.

An allegation about criminal behaviour should be reported to the police

Depending on the decisions that are made in discussion with the Local Authority Designated Officer. The following will be agreed:

- Whether a disciplinary procedure can run in parallel to any investigations including criminal proceedings
- Whether the member of staff should be suspended – although the power to suspend is vested with the employer, MLCE will take full consideration of the views of social care workers and the police and the setting where the MLCE staff member is working.
- If a decision is made to remove an individual (paid worker or unpaid volunteer) from working looking after children (or would have, had the person not left first) because the person poses a risk of harm to children, MLCE is obligated by law to make a referral to the Disclosure and Barring Service. It is a criminal offence to fail to make a referral without good reason.

Support for workers where an allegation has been made.

- MLCE will make arrangements to make sure the member of staff is kept informed of the process – this will usually be through their line manager. MLCE will aim to provide appropriate support. If a member of staff is a member of a trade union or professional association they should be advised to contact that body at the outset.

#### **4.5 What to do if an allegation is made against a worker in their personal life.**

If an allegation is made against a worker which relates to their personal life and it fits into the criteria outlined above.\*

MLCE staff are required to inform the MLCE Designated Safeguarding Person and the Co-CEO immediately. Failure to do so will be a disciplinary offence.

<b>4.6</b>	<b>What to do if there are concerns about the way another agency responds to a child protection issue.</b>
	<p>MLCE staff must ensure that before entering into partnerships with other organisations/agencies due diligence is carried out to ensure partners have robust safeguarding policies and procedures in place. A Service Level Agreement (SLA) must be put in place to govern the principles of working and the processes for safeguarding.</p> <p><b>The Designated Safeguarding Person should:</b></p> <ul style="list-style-type: none"><li>○ Gather the facts from MLCE member of staff.</li><li>○ Make a clear note of the issues and check back with the staff involved that they are correct.</li><li>○ A MLCE risk assessment will be carried out.</li><li>○ The Co-CEO will discuss the issues with the Non-Executive Director Safeguarding Lead.</li><li>○ If it is agreed no further action is to be taken, the Manager will monitor and record the situation concisely and clearly.</li><li>○ Report to the Co-CEO again and a decision may be made to refer the case to the appropriate authority</li><li>○ The Co-CEO should be kept informed at every stage of the process.</li></ul>

## SECTION 5 TRAINING

<b>5.0</b>	<b>TRAINING</b>
<b>5.1</b>	<p><b>All staff and lead Non-Executive Directors with responsibility for safeguarding will receive training this includes:</b></p> <ul style="list-style-type: none"> <li>• Lead Non-Executive Directors</li> <li>• Co-CEO</li> <li>• Managers</li> <li>• Staff members</li> <li>• Volunteers</li> </ul>
<b>5.2</b>	<p><b>Staff will receive:</b></p> <ul style="list-style-type: none"> <li>• Half a day training in their induction</li> <li>• Level one safeguarding training within first 6 months of employment</li> <li>• More advanced training according to local circumstances in discussion with their manager or MLCE Co-CEO</li> <li>• Refresher training every two years</li> </ul>
<b>5.3</b>	<p><b>Volunteers will receive</b></p> <ul style="list-style-type: none"> <li>• Half a day training in their induction</li> <li>• Level one safeguarding training within first 6 months of employment</li> </ul>
<b>5.4</b>	<p><b>The Designated Safeguarding Officer(s) will receive:</b></p> <ul style="list-style-type: none"> <li>• Induction</li> <li>• More advanced training according to local circumstances in discussion with their MLCE Co-CEO</li> <li>• Refresher training every three years</li> <li>• Previous training and experience will be taken into account</li> </ul>
<b>5.5</b>	<p><b>Lead Non-Executive Director</b></p> <ul style="list-style-type: none"> <li>• will be offered the opportunity to access advanced training</li> </ul>

## SECTION 6 MONITORING

6.0	<b>MONITORING</b>
6.1	<b>DBS checks</b> All staff, sessional workers and volunteers who have regular contact with children will have completed a DBS check before commencing employment.
6.2	<b>Training Session Recording Sheets</b> Each group/training session should be recorded as an element of good practice.
6.3	<b>Cause for concern forms.</b> These forms will be a separate record of concerns about a child, recording action taken especially if not deemed serious enough for a referral.
6.4	<b>Report to Managers</b> A quarterly report of the involvement of safeguarding issues is to be reported to the Managers and they should ensure the Co-CEO is informed. The report will include updates on training who has received it and outstanding issues.
6.5	<b>Report to Non-Executive Directors</b> Yearly report presented to the Board of Non-Executive Directors by the Lead Non-Executive Director to include description of activity in that year, training report and any issues of concern in the implementation of the policy.
6.6	<b>Monitoring of training by Managers</b> Agreed by the Board of Non-Executive Directors.

## SECTION 7 INFORMATION STORAGE & SHARING

7.0	<b>INFORMATION STORAGE &amp; SHARING</b>
7.1	<p><b>As an agency working with a range of other community and statutory agencies in the interests of the safety, welfare and well-being of children MLCE has a responsibility to:</b></p> <ul style="list-style-type: none"> <li>• Store and share photographs, images and personal and sensitive information in line with MLCE's Data Protection Policy and procedures</li> <li>• Exchange relevant information to progress investigations, assessments and case management as permitted by law. Requests for information made by statutory safeguarding partners must be complied with; failure to do so may result in legal action being taken against MLCE.</li> <li>• Work with other agencies within agreed, co-ordinated procedures for the care and protection of children in ways that strengthen and support the family.</li> </ul>

## SECTION 8 SAFE WORKING

<b>8.0</b>	<b>SAFE WORKING</b>
<b>8.1</b>	<p><b>Procedures</b></p> <ul style="list-style-type: none"> <li>• Never enter a house if a child is at home on their own unless there is immediate danger.</li> <li>• Do not make personal arrangements with a family or child such as loaning money or buying presents or meeting outside of working hours.</li> <li>• Never give your personal mobile telephone number or home number to families or children if it can possibly be avoided.</li> <li>• Do not take responsibility for children outside of <i>loco parentis</i> arrangements.</li> </ul>
<b>8.2</b>	<p><b>Safe working with children in a one to one situation</b></p> <p>This guideline seeks to reconcile the need for privacy with the need for protection for staff when working 1:1 with children.</p> <ul style="list-style-type: none"> <li>• 1:1 work should normally only take place with the agreement of the parent/carer or the school for older children. Any exception to this must be agreed by the MLCE line manager beforehand.</li> <li>• The room in which the worker is based should not be isolated.</li> <li>• The room should have glass in the door or the door should be kept open or another adult should be made aware that an interview is taking place.</li> <li>• The worker should sit opposite the child unless a specific task (e.g. reading) necessitates sitting alongside.</li> <li>• Physical contact with a child should always be within the context of MLCE policies.</li> <li>• Youth Workers should be clear on the borough's policy on physical restraint. It should be adhered to. Normally staff should not restrain a child but should seek help from another member of staff.</li> <li>• Workers should consider the suitable seating arrangements in a one to one situation for instance; there may be children who should sit nearer the door and vice versa. This is a particular consideration where there is a history of actual or suspected violence with the child and/or family.</li> <li>• 1:1 sessions should always be recorded with an indication of the nature of the discussion/activity.</li> <li>• Workers should log and report any incident about which they feel uneasy. (E.g. if a child/young person leaves a session alleging inappropriate physical contact).</li> <li>• <i>Do not carry children in your car as passengers unless absolutely necessary, and only with consent from parents/carers. If you do you must ensure appropriate restraints (see guidelines on car seats from ROSPA) are used and that you are covered by insurance.</i></li> </ul>

**This document has approved by MLCE Non-Executive Directors**

**Chair's Name** \_\_\_\_\_

**MLCE**

**Chair's signature** \_\_\_\_\_ **Date:** \_\_\_\_\_

## SAFEGUARDING & CHILD PROTECTION NAMED STAFF

Position	Name & Position	Location
Overall Responsibility for Safeguarding	Ken Robinson, Chair of Board of Directors	Marcus Lipton Community Centre
Designated Safeguarding Person	Margaret Pierre, Managing Director	Marcus Lipton Community Centre
Deputy Designated Safeguarding Person	Darren Duncan, Therapeutic Manager	Marcus Lipton Community Centre

## Appendix 2

### Safeguarding Children and Young People Vulnerable to Violent Extremism (PREVENT DUTY)

“Protecting children from the risk of radicalisation should be seen as part of childcare providers’ wider safeguarding duties”.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

As with managing other safeguarding risks, the organisation should be alert to changes in children’s behaviour that could indicate that they are in need of protection.

MLCE staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. This may include making a referral to the Channel programme (Keeping Children Safe in Education, Department for Education, July 2015) Full detail can be found here:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/447595/KCSIE\\_July\\_2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/447595/KCSIE_July_2015.pdf)

Our organisation safeguarding policy therefore complies with the later years childcare providers under Section 26 of the Counter Terrorism and Security Act 2015 in accordance with the Government’s Prevent Duty Departmental Advice, June 2015: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)

## Appendix 3

### Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is a form of violence against women and girls and it is considered **child abuse** and is **illegal**. It comprises of all procedures involving partial or total removal of the external female genitalia for non-medical reasons. It may be carried out at any time in a girl's life, from baby to womanhood, but the most common age for those FGM cases where the age is known is 5 to 9-year-old girls. FGM can be seen as a pathway to womanhood and can also be a condition of marriage. Some communities believe that if a girl has not had it done, she is deemed unhealthy, unclean, or unworthy. Parents can have very strong beliefs, genuinely thinking they are doing the right thing for their daughter, and in communities where all females have the procedure it can seem normal, then making it very difficult for girls to challenge this tradition. The FGM leaflet and FGM passport in Resources below can be supportive means for families.

FGM is child abuse and should be dealt with as part of existing child and adult safeguarding/ protection structures, policies and procedures. Please refer to the FGM Safeguarding Flowchart (Department of Health). [https://www.lambethscb.org.uk/sites/default/files/2016-12/FGM\\_Safeguarding\\_Flowchart.pdf](https://www.lambethscb.org.uk/sites/default/files/2016-12/FGM_Safeguarding_Flowchart.pdf)

In the UK, anyone found guilty of an FGM offence or of helping somebody commit one, faces up to 14 years in prison, a fine, or both, regardless of where in the world the FGM takes place. Anyone found guilty of failing to protect a girl under the age of 16 from risk of FGM faces up to 7 years in prison, a fine, or both.

As of 31st October 2015 it has been **mandatory to report** cases of "known" FGM to the Police. The duty applies to all regulated professionals working within health or social care, and teachers. This mandatory requirement to report to police applies to 'visually identified' cases (the person observes physical signs on a girl appearing to show that an act of FGM has been carried out) or 'verbally disclosed' cases (a girl informs the person that an act of FGM – however described – has been carried out on her) of FGM in girls under 18. The mandatory reporting does not apply to suspected cases or where a child might be 'at risk' of FGM. **Here is the NHS flowchart for the mandatory reporting process of FGM.**

#### ***Possible signs***

##### **...someone may be at risk of FGM:**

- knowing both that the family of a girl belongs to a community in which FGM is practised and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from school
- a child may also talk about being taken "home" for a special visit to become a woman or a special procedure/ceremony that is going to take place
- a child may say an older female relative is coming especially to see her

##### **...someone might have undergone FGM:**

- prolonged absence from school or other activities with noticeable behaviour change on return, they may become withdrawn and possibly with bladder or menstrual problems
- find it difficult to stand or sit still and look uncomfortable, or may complain about pain between their legs
- talk of something somebody did to them that they are not allowed to talk about
- spend longer in the toilet than usual; because of bleeding and/or infection. Have frequent vaginal, urinal, or pelvic infections

- have blood born infections, including Hepatitis B & C, and HIV
- be reluctant to undergo any medical examinations
- may ask for help, but not be explicit about the problem due to fear or embarrassment
- develop emotional and mental health problems; self-harm or signs of child abuse

***What to do if you are concerned about someone who might be at risk:***

- Talk to them about your concerns, but use simple language, straightforward questions and be sensitive. Let them know that they can talk to you again.
- **If the risk is immediate, call 999**
- Call the free 24 hour FGM helpline anonymously on 0800 028 3550 or email [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk) for advice, support or to report a concern (NSPCC)
- Call the local Gaia Centre on 0207 733 8724 or email [lambethvawg@refuge.org.uk](mailto:lambethvawg@refuge.org.uk) for help, this is a Lambeth service that supports girls and women who experience gender-based violence such as FGM
- Call Africa Advocacy Foundation on 020 8698 4473 who work in Lambeth providing drop-in confidential counselling and advice as well as discussions through group meetings for women
- Suggest they carry a 'FGM passport' with them, especially when they go abroad. It is a Statement opposing FGM available in several languages. They can show it to their family, it makes it clear that FGM is a serious criminal offence in UK
- Make a referral to Children's Social Care on 0207 926 3100; if you are a professional please fill in the **Multi-Agency Referral Form (MARF)** and forward it to [helpandprotection@lambeth.gov.uk](mailto:helpandprotection@lambeth.gov.uk) or [help.protection@lambeth.cjsm.net](mailto:help.protection@lambeth.cjsm.net) (secure email)
- Health and social care professionals can complete the e-learning session 'Communication Skills for FGM consultations' at [www.e-lfh.org.uk](http://www.e-lfh.org.uk) which provides advice and training to support these discussions. Other professionals can watch a video on NHS Choices where women who have had FGM discuss how they would like to see professionals hold sensitive conversations about FGM: [NHS.uk](http://NHS.uk)
- Go to [www.fco.gov.uk/fgm](http://www.fco.gov.uk/fgm) for more information

**RESOURCES**

- Further information from Lambeth <https://www.lambethscb.org.uk/sites/default/files/2018-07/FGM%20Document%20Lambeth%202017%20-%20final.pdf>
- Lambeth's FGM Leaflet: [https://www.lambethscb.org.uk/sites/default/files/2018-06/FGM\\_A5\\_leaflet%20Lambeth.pdf](https://www.lambethscb.org.uk/sites/default/files/2018-06/FGM_A5_leaflet%20Lambeth.pdf)

## Appendix 4

### Gangs and County Lines /Serious Youth Violence

#### What is a street gang?

A gang is usually considered to be a group of people who spend time in public places that

- see themselves (and are seen by others) as a noticeable group, and
- engage in a range of criminal activity and violence.
- They may also have any or all of the following features
  - identify with or lay a claim over territory,
  - are in conflict with other, similar gangs

#### Why do young people want to belong to a gang?

Here are some of the reasons young people might give for being in a gang:

- identity
- a sense of belonging
- they think it will make them safer
- they think they will make money

Bonding and group identity are an important part of social life and growing up. But when a bond is based around crime, violence is usually not far away.

Children and young people involved with, or on the edges of, gangs might be victims of violence or they might be pressured into doing things like robbery or carrying drugs or weapons. They might be abused, exploited or put into dangerous situations.

#### What is 'County lines'?

'*County lines*' is the term used to describe the approach taken by gangs originating from large urban areas, who travel to locations elsewhere such as county or coastal towns to sell class A drugs. Gangs typically recruit and exploit children and vulnerable young people to courier drugs and cash. Typically, users ask for drugs via a mobile phone line used by the gang. Couriers travel between the gang's urban base and the county or coastal locations on a regular basis to collect cash and deliver drugs. Gangs recruit children and young people through deception, intimidation, violence, debt bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of a vulnerable adult who is unable to challenge them.

County lines cuts across a number of issues including: drug dealing, violence, gangs, exploitation, safeguarding, modern slavery and missing persons. It is critical that practitioners working directly with children and vulnerable adults are aware of what county lines is, how to identify those at risk or involved in county lines exploitation and what action to take. Please read more in the core brief from the DfE (March 2017) in Resources below and in the [Home Office Guidance about County Lines](#) (July 2017).

## How can you help a child involved in a gang?

- Support groups and specialist organisations such as [St Giles Trust](#), [Safer London Foundation](#), [XLP](#) and [Gangline](#) can help.
- Suggest to the child or young person to call Childline on 0800 1111 for support and advice - it's a free 24/7 confidential helpline for children - or they can access more information about gangs on the [Childline website](#)
- Call NSPCC [helpline](#) for more advice about how to help, which is specific to the child's or young person's situation.
- [Redthread](#) has programmes such as 'Gangs exit' and a Youth Violence Intervention programme based in A&E.
- #knifefree campaign provides information on [consequences of carrying a knife](#), [real stories](#) of real people affected by knife crime and [how to go #knifefree](#).

Always consider other often related risks such as CSE, going Missing from home or care or radicalisation when you have a concern about gang affiliation or county line involvement. Please see the Young People at Risk Strategy below.

### If you are worried about a child, contact the Integrated Referral Hub:

- **Professionals' Line: 020 7926 3100**
- **Public Line: 0207 926 5555** (24 hours)
- **Email:** [helpandprotection@lambeth.gov.uk](mailto:helpandprotection@lambeth.gov.uk) or [help.protection@lambeth.cjism.net](mailto:help.protection@lambeth.cjism.net) (secure email)

If you are a professional, please always follow up your referral in writing by filling in the [Multi-Agency Referral Form \(MARF\)](#) and forward it to the email address above.

### If a child is at immediate risk of significant harm, please dial 999

### Young People at Risk Strategy

The Lambeth Safeguarding Children Board published a Young People at Risk Strategy which sets out our ambition and resolve for young people to be free from the risk of

- CSE
- Missing from home, care or education
- Serious Youth Violence
- Involvement with gangs and/ or County Lines
- Radicalisation

Youth People At Risk (YPaR) Strategy 2017-19

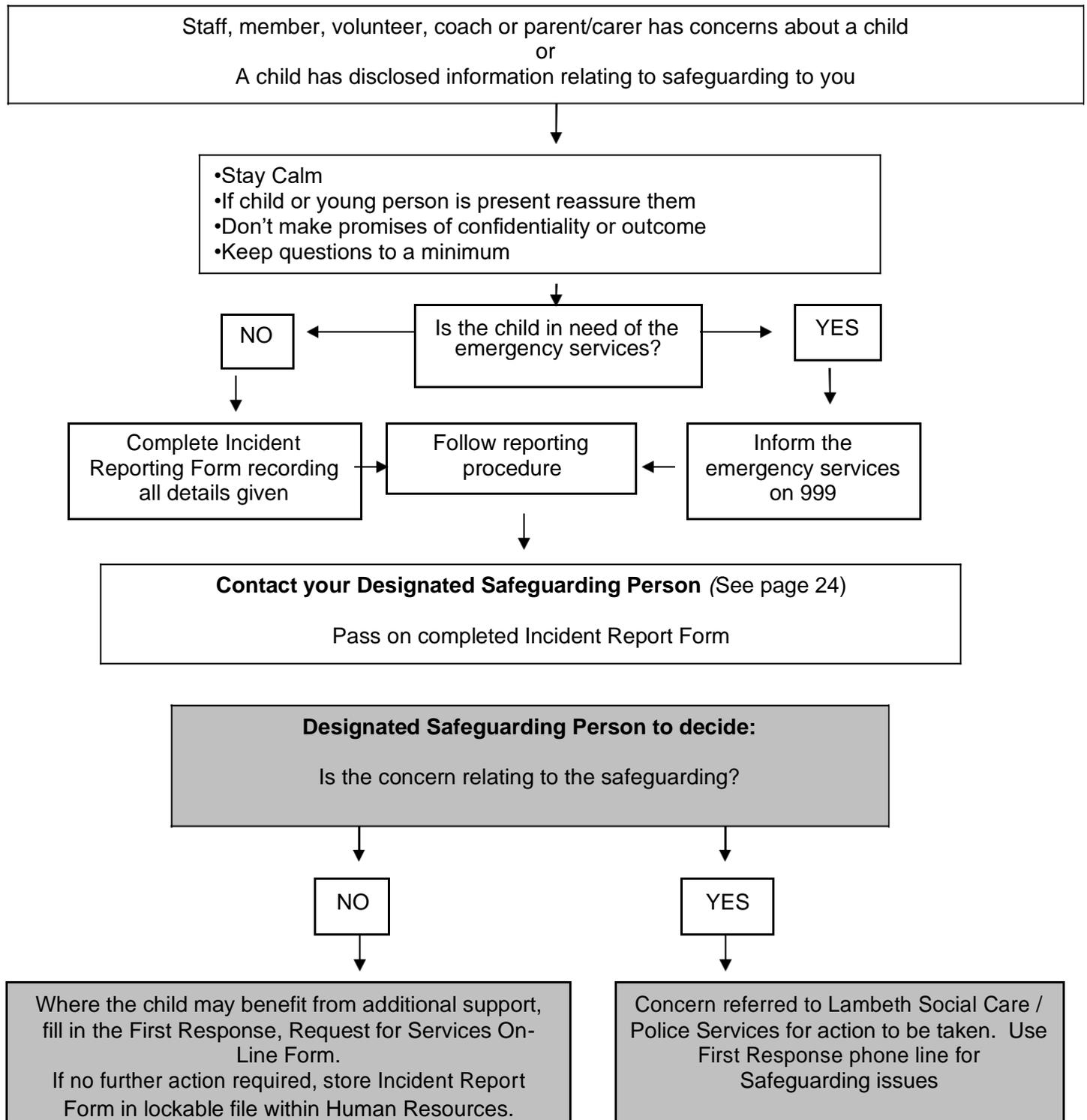
[https://www.lambethscb.org.uk/sites/default/files/2017-12/LSCB%20YPAR%20STRATEGY%20FINAL%202017\\_for%20print.pdf](https://www.lambethscb.org.uk/sites/default/files/2017-12/LSCB%20YPAR%20STRATEGY%20FINAL%202017_for%20print.pdf)

It was launched at the YPAR conference in October 2017, please see the keynote speaker presentations below and a brief [video](#) from the conference:

- [Annie Hudson, Strategic Executive Director Lambeth Children Social Care](#)
- [Dr. Helen Beckett from University of Bedfordshire \(CSE\)](#)
- [Junior Smart \(SOS, St Giles\)](#) and watch '[Breaking the cycle](#)' (SOS project)
- [John Poynton and Lucy Knell-Taylor from Redthread \(SYV\)](#)
- [Robyn Marsh, Safer London](#) (Missing children/Return home interviews)

For more resources visit <https://www.lambethscb.org.uk/professionals/gangs>

## Guide for dealing with concerns relating to child abuse



**Out of office hours contact:** Social Care - 020 7926 5555  
Police - 101 or 999

## Who is the Designated Safeguarding Person for concerns relating to children?

If appropriate and helpful to you, you may speak to your line manager who will support you through the following process:

**In the first instance report to either:**

Your Line Manager

OR

Darren Duncan – Designated Safeguarding Person (DSP)

Margaret Pierre – Deputy Designated Safeguarding Officer (DDSP)



Social Care Team  
Office hours – 020 7926 5555  
Out of hours – 020 7926 5555



NSPCC action help line  
0808 800 5000

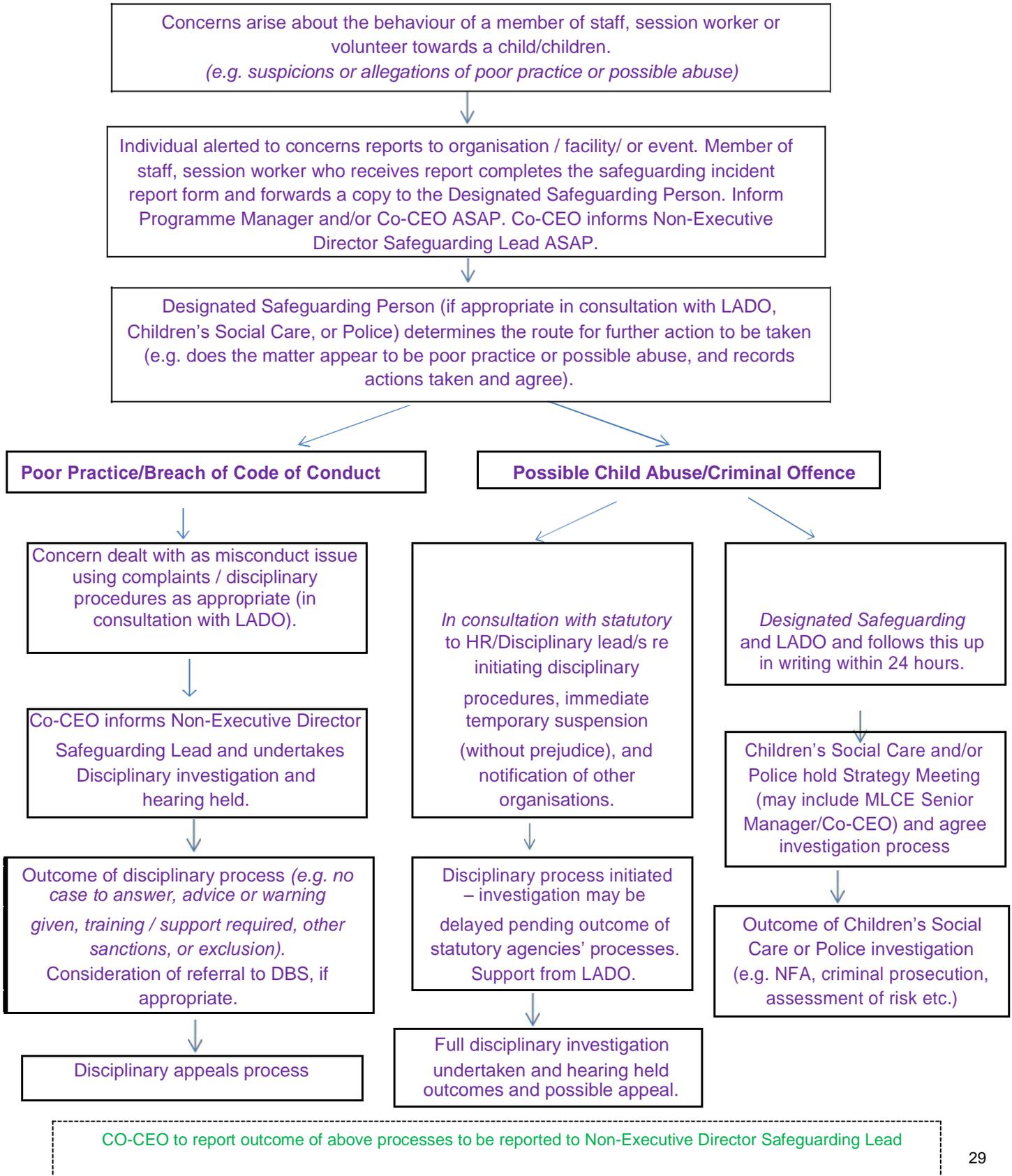


Always follow the reporting procedure back to the Designated Safeguarding Person

**If you feel that there is an immediate risk, always contact the emergency services!**

**999!**

**Outline Safeguarding Reporting Concerns Procedure**  
**About the behaviour of a staff member, session worker or volunteer**  
*(e.g. allegation about a staff member or session worker's behaviour towards a child)*



## MLCE Safeguarding Main Responsibility Structure

### Non-Executive Director Safeguarding Lead

- Responsibility to ensure the organisation is following good practice and that policies are up to date
- Responsible for leading investigation of allegations against Non-Executive Directors/Co=CEO
- Reports annually and informs Board of Non-Executive Directors of safeguarding issues

### Co-CEO

- Works with Lead Non-Executive Executive Director to produce a yearly report
- Monitors safeguarding work, training & induction
- Responsible for investigating allegations against staff unless it is about himself/herself

### Lambeth Safeguarding Children Board (LSCB) Dedicated Safeguarding Officer (LADO)

- Supports investigations
- Makes recommendations

### Lead Worker

- Monitors safeguarding & training compliance with support of Co-CEO.
- Manages risk assessments
- Liaises with partners and agencies in particular the Designated Safeguarding Person from the organisation when necessary.

### Designated Safeguarding Person

- Keeps all staff and session workers updated with current safeguarding procedures
- Provides advice and support to partner staff e.g. schools and Children's Centres
- Refers any concerns as soon as they arise to appropriate authority
- Ensures that all relevant information about a child at risk is disseminated to appropriate staff or session worker within MLCE
- Maintains accurate and secure safeguarding records
- Manages risk assessments
- Supports staff when involved in cases
- Promotes a safe environment for children