

Safeguarding and Child Protection Policy and Procedures

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29/03/20	All	Full Policy issued, incorporating trustee feedback.	
30/06/21	Pg 30 Pg 35	Youth Work Safeguarding Lead Updated Addition of the NSPCC Helpline for Reporting Abuse in Education, under Appendix J Peer on Peer Abuse.	
31/07/21	Appendices & footer	Appendices re-ordered & footer updated. Body Map re-inserted	
30/09/22	Throughout	Policy update in response to Keeping Children Safe in Education 2022 guidance This includes; replacing the term 'Peer on Peer' abuse, with 'Child on Child' abuse, condensing Safer Recruitment section, updating links; adding managing low level concerns and updating definition of domestic abuse.	
06/07/23	All	No Changes	
11/07/24	All	Full Policy Review in response to KCSIE 2023 & Working Together 2023 updates- including revised definition of safeguarding and online safety. Clarification for staff to use CAF for MASH referral & Record of Concern for issues not meeting statutory thresholds. Updated Safeguarding Lead trustee	

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Safeguarding and Child Protection Policy and Procedures

Part A	Core Policies and Procedures
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1. Introduction

The Winch is committed to safeguarding the children, young people and adults in its care.

The Winch believes everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them. It is always unacceptable for a child, young person or vulnerable adult to experience abuse of any kind.

The Winch adopts the definition of safeguarding outlined in statutory guidance; Working Together to Safeguard Children (HM Government 2023) as:

- **Providing help and support to meet the needs of children as soon as problems emerge**
- **Protecting children from maltreatment, whether that is within or outside the home, including online**
- **Preventing impairment of children’s mental and physical health or development**
- **Ensuring that children grow up in circumstances consistent with the provision of safe and effective care**
- **Promoting the upbringing of children with their birth parents, or otherwise their family network where this is in the best interests of the children**
- **Taking action to enable all children to have the best outcomes**

Working Together 2023 states: “Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families’ lives”.

Safeguarding of ‘vulnerable adults’ is defined in the Winch’s Safeguarding Adults at Risk Policy.

The core principles that inform safeguarding at the Winch are:

- The welfare of the children, young people and adults at risk is paramount; it is our most important priority.
- All children and young people, regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, have a right to equal protection from harm or abuse.
- Working in partnership with children, young people, their parents and carers and other agencies is essential in promoting young people’s welfare and in keeping them safe.

2. Purpose and Scope of the Policy and Procedures

The Safeguarding and Child Protection Policy and Procedures sets out how the Winch will safeguard and protect the children and young people that benefit from its provision.

The Policy establishes the fundamental, underpinning safeguarding arrangements for the Winch. *Appendix A* outlines the core legal framework and relevant guidance for safeguarding. The Policy provides staff and volunteers' direction and guidance on the procedures they should follow if they are concerned a child or young person is experiencing, or is at risk of, harm or abuse.

The Policy applies to all staff, including senior managers and trustees, sessional or agency workers, contractors, volunteers, interns and students on placement. It is available to beneficiaries, the wider Winch community and partners, via the Winch website.

3. Roles and Responsibilities

All staff and volunteers have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them. Some staff and volunteers have specific responsibilities:

A. Trustees

The Winch adopts The Charity Commission outline of the safeguarding responsibilities of trustees:

“We expect all trustees to make sure their charity has appropriate policies and procedures in place, which are follows:

- checks that people are suitable to act in their roles
- knows how to spot and handle concerns in a full and open manner
- has a clear system of referring or reporting to relevant organisations as soon as concerns are suspected or identified
- sets out risks and how they will be managed in a risk register, which is regularly reviewed
- follows statutory guidance, good practice and legislation relevant to their charity
- is quick to respond to concerns and carry out appropriate investigations
- does not ignore harm or downplay failures
- has a balanced trustee board and does not let one trustee dominate its work
- makes sure protecting people from harm is central to its culture
- has enough resources, including for safeguarding and protecting people
- conducts periodic reviews of safeguarding policies, procedures and practice”.

Safeguarding and Protecting People for Charities and Trustees (October 2019)

In accordance with the Winch's Justice, Equity, Diversity and Inclusion (JEDI) policy, trustees are cognisant that children with legally protected characteristics may be more at risk of harm. They aim to reflect this in the organisation's safeguarding policies and procedures and in leading and promoting a safe, inclusive culture.

The Safeguarding Champion is a trustee, appointed from the Board with a mandate to help the Board better meet its safeguarding obligations. The Champion is also referred to as the Lead Safeguarding Trustee.

The Safeguarding Champion supports the Board in developing its understanding of its safeguarding responsibilities. They encourage the Board to nurture and lead a culture in which the safeguarding of children, young people and vulnerable adults is paramount. They act as the link between Board and the organisation's Designated Safeguarding Lead, ensuring that The Winch:

- has effective safeguarding children and vulnerable adult policies in place, which are accessible and regularly reviewed and updated;
- recruits staff and volunteers in line with safer recruitment policies and processes;
- accesses appropriate safeguarding training and development opportunities for all staff and volunteers; and
- has robust procedures for dealing with allegations of abuse made against staff and volunteers.

B. The Chief Executive & Chief Operating Officer

The Chief Executive works in accordance with the policy requirements for all Winch staff. In addition, they ensure compliance with safeguarding policies and procedures adopted by the Board, and they are responsible for leading and promoting a culture in which children and young people are appropriately safeguarded.

The Chief Operating Officer supports the Chief Executive, deputising on their behalf and in their absence. The Chief Operating Officer has lead responsibility for HR, Health and Safety, Data Protection and IT systems. This includes responsibility for the effectiveness of the Winch's online filtering and monitoring systems

C. Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) takes lead responsibility for overseeing child protection referrals and safeguarding training. They are responsible for:

- Raising awareness of and ensuring compliance with safeguarding and child protection policies and procedures;
- Acting as a source of advice and support on child protection matters;
- Ensuring timely referrals are made in accordance with Winch procedures; and
- Working with the local authority and other agencies as required.

If the Designated Safeguarding Lead is unavailable, the Deputy Lead or Safeguarding Manager will act in their absence.

D. Safeguarding Manager & Ofsted Nominated Person

The Safeguarding Manager(s) takes lead responsibility for managing child protection referrals. They are responsible for:

- Raising awareness of and ensuring compliance with safeguarding and child protection policies and procedures;
- Building a safeguarding culture in which children and young people's best interests are promoted and in which they can thrive;
- Ensuring professional development, and providing supervision and support opportunities, so that staff and volunteers learn, growing their knowledge, experience and skills;
- Ensuring safeguarding risks are identified, explored and appropriately managed; and
- Working collaboratively with partners and other external agencies to ensure children are protected.
- The Ofsted Nominated Person is a Safeguarding Manager. They have specific responsibilities to liaise with Ofsted on safeguarding issues and ensure compliance. They must coordinate their actions with the Designated Safeguarding Lead, keeping them regularly appraised of any Ofsted guidance or direction and ongoing updates and communication.

E. All staff and volunteers

Anyone can be concerned that a child or young person is experiencing or is at risk of harm. Any child or young person may need a trusted adult or peer to talk to. Safeguarding children and young people can be simple *and* complex, can sometimes feel difficult or daunting, and can trigger powerful emotions in even the most experienced or skilled professionals.

All staff and volunteers are responsible for ensuring they are aware of and adhere to Winch's Safeguarding and Child Protection Policy and Procedures. All staff and volunteers have a responsibility to safeguard children and young people and to provide environments in which children and young people can succeed. This includes both physical environments and online environments.

All staff have a responsibility to develop their knowledge, interest and understanding of safeguarding issues, as appropriate to their role. If staff or volunteers have concerns about a child's welfare, they must act on them immediately and speak with the relevant member of staff– they must not assume that others have taken action.

F. Staff Training

The Winch is committed to ensuring staff have access to appropriate training and development opportunities that contribute to their ability to carry out their safeguarding roles. Staff are expected to be inducted in the Winch Safeguarding Policy within their first 14 working days (pro-rata for part time staff).

The Designated Safeguarding Lead and Safeguarding Managers must undertake continuous professional development on safeguarding. At a minimum, they must complete Level 3 safeguarding refreshers every two years.

4. Safer Recruitment

4a. Safer Recruitment Policy

The Winch aims to recruit the best possible people and to enable them to perform well by inducting them to the organisation and supporting their professional development.

We are committed to equity, valuing diversity and working inclusively across all of our activities. We aim to have a workforce that represents the different communities we serve and that have the knowledge, experience, abilities and skills to deliver our mission.

We are committed to safeguarding the children, young people and adults, and recognise the need to have robust recruitment practices and procedures to ensure we fulfil these commitments. To this end, we recognise and undertake to deliver the following;

- i. Our workforce is one of our most important assets in delivering our mission. We will therefore recruit and select the best possible people to join our workforce.
- ii. Unsuitable individuals actively seek out opportunities to have contact with children, young people and adults in order to harm them. We will act appropriately to deter and prevent unsuitable applicants and volunteers joining the Winch. We will ensure that we identify and respond to any concerns about individual suitability raised during recruitment, selection and induction processes.
- iii. Some groups face unfair discrimination in the workplace. Children, young people and families benefit from our efforts to recruit and select a skilled, diverse and committed workforce. We will recruit, select and manage our staff and volunteers in a way designed to combat inequality and discrimination and in compliance with our legal obligations;
- iv. Staff and volunteers can perform their role most effectively when they are inducted well and receive ongoing support and supervision. We will ensure that we give staff, volunteers and trustees an appropriate induction and that we provide them with ongoing support and supervision.

The Winch has a comprehensive Safer Recruitment Policy, which should be read alongside this policy.

4b. Safer Recruitment Procedures

We will adhere to the following recruitment principles:

- i. Advertise jobs or roles;
- ii. Provide a job or role description, which includes our commitments to safeguarding and equality of opportunity, outlines the post holder's responsibilities in relation to these commitments and notifies candidates that they will be subject to a Disclosure and Barring Services or equivalent check;
- iii. Involve more than one person in recruitment and selection processes, at least one of whom has been trained in safer recruitment procedures
- iv. Incorporate the views and perspectives of beneficiaries and partners where appropriate;
- v. Assess candidate's motivations for working with children and adults at risk, their knowledge, skills and experiences of safeguarding, and their ability to contribute to and promote an inclusive work culture;

- vi. Carry out appropriate vetting procedures, including obtaining references and online checks, which explore the applicant's suitability for the role and for working in an environment regularly accessed by children, young people and adults at risk.
- vii. Verify the candidate's qualifications, eligibility to work and identity.
- viii. Require all staff and volunteers have an up-to-date and relevant DBS check.
 - ix. Actively manage any disclosure raised or offered by applicants.
 - x. Appoint all staff and volunteers subject to a probation period appropriate to their role.
 - xi. Ensure appropriate records are kept;
 - xii. Provide appropriate induction and orientation support; which includes safeguarding.
- xiii. Offer and ensure participation in regular supervision and support meetings;
- xiv. Ensure that any individuals or agencies commissioned or contracted by the Winch and coming into contact with children and young people are subject to appropriate safeguarding requirements;
- xv. Provide every staff member who leaves the employment the offer of an exit interview to capture any concerns and learning.

Please refer to our Safer Recruitment Policy for more details.

5. Child Protection Procedures

5a. Purpose

We will ensure that the children and young people who attend, engage or who come to the attention of the Winch, receive the protection and support they need.

The Child Protection Procedures provide direction to staff and volunteers on the actions they must take if they have concerns that a child or young person has experienced or is likely to experience significant harm and is in need of protection.

We use the term child or children throughout these Procedures to refer to anyone under the age of 18. However, in some circumstances, we may be able to anticipate the likelihood of significant harm to an expected, but yet unborn, baby.

5b. Recognising Abuse and Significant Harm

The Children Act 1989 introduced the concept of 'significant harm' as the threshold that justifies compulsory intervention in family life, in the best interests of children, and gives local authorities a duty to make enquiries (known as 'Section 47') to decide whether they should take action. The Act defines 'harm' as the ill treatment or impairment of health and development.

Appendix A sets out the Statutory Framework under which the Winch's Safeguarding Policy and Child Protection Procedures operate, including the Children Act 1989 and the London Child Protection Procedures.

Appendix B sets out the different types of abuse or harm children and young people may face, and offers guidance on the signs and symptoms of abuse and harm.

5c. Ways that abuse might be brought to your attention

Abuse or harm can be brought to your attention in many different ways, for example:

- a child might make a direct disclosure about themselves;
- a child might make a direct disclosure about another child;
- a child might offer information that is worrying, but is not a direct disclosure;
- a member of staff might be concerned about a child’s appearance or behaviour or about the behaviour of a parent, carer or peers towards a child;
- a parent or carer might make a disclosure about abuse that a child is suffering or at risk of suffering;
- a parent might offer information about a child that is worrying but not a direct disclosure;
- a partner, partners or other adults might offer information this is worrying, individually or when separate information is pieced together to form a fuller picture.

Staff and volunteers should be aware that some children might not be ready to share that they are being abused, or may not find it easy to tell someone. They may try to communicate indirectly, they may talk to a friend, or hope that an adult notices or creates a safe enough space for them to share their experience. Where a member of staff or volunteer does become aware of or worried about a child, they should endeavour to follow up directly with the child concerned and to share and explore their concerns with the appropriate colleagues.

5d. Listening to the Child

If a child raises a concern, the initial response should be limited to listening carefully to what they say. In responding:

Do:	Don't:
<ul style="list-style-type: none"> ● Let the child tell their whole story. 	<ul style="list-style-type: none"> ● Don't try to investigate or ask leading questions. Don't show disbelief.
<ul style="list-style-type: none"> ● Clarify their concerns. 	
<ul style="list-style-type: none"> ● Ask what they would like to see happen as a result. 	<ul style="list-style-type: none"> ● Don't offer false assurances about the confidentiality of a disclosure. ● Don't make promises that you or other professionals cannot keep.
<ul style="list-style-type: none"> ● Explain what you can do to keep them safe (or keep the child who is the subject of the disclosure safe). 	
<ul style="list-style-type: none"> ● Reassure them that telling someone about their concerns is the right thing to do. 	

You must follow this approach with any adult sharing information or making a disclosure

5e. Taking Action

- If you have a concern, or had a concern raised to you, you must discuss it with your line manager. *Appendix C* outlines the operational procedures for escalating a concern.
- Your line manager will explore the concern with you, assess how to respond and agree any actions.
- If your line manager is not available, then you should raise your concern with a Safeguarding Manager or the Designated Safeguarding Lead.
- Any member of staff can make a referral to or seek advice from Camden Social Care. You must refer to the Children & Families Contact Team (incorporating MASH and Early Help services) using the Common Assessment Form (CAF). *Appendix D* outlines the help available from Camden Council.
- In deciding whether to make a referral or to share information with Camden and/or other agencies, you must consult the Designated Safeguarding Lead or a Safeguarding Manager. However, if they are not available, you should not delay action to safeguard a child.
- Where a decision is made not to make a referral, you must record this decision using the Record of Concern Form (*Appendix E*) and note this against the child/young person's record in Lamplight. This will help us to monitor any pattern of concerns.
- You must inform the Designated Safeguarding Lead any referral that you make. You must share a written record of the referral within 48 hours of making a referral, using the CAF form.
- You must inform the Safeguarding Managers of any decision not to refer and the reasons for this decision. You must send the Record of Concern Form to the Safeguarding Manager.
- Where you observe physical injuries, you must note the injuries accurately and factually on the Body Map (*Appendix H*). You must not ask to see intimate parts of a child's body or take photographs.
- If the child can understand the significance and consequences of making a referral to Camden Council, you must ask them for their views and these views noted and taken into account.
- The parent or carer of the child must be informed of any concern, be engaged in the evaluation of any concern, and be party to and informed of any decision to refer. Where possible, you should have this dialogue in advance of making a referral.
- Unless this would cause undue delay in protecting a child, you should seek advice from the Designated Safeguarding Lead or Safeguarding Manager, if the parent or carer refuses to engage with or give permission for the referral.
- In some exceptional cases, it may be necessary to make a referral before or without informing the parents or carers. Exceptional cases include circumstances where you could put a child at risk of immediate or increased harm or you could interfere with a criminal investigation.
- If your concern involves or is about a member of staff or volunteer at the Winch, please refer to the separate Winch procedures on raising allegations against staff (Section 7).
- If an allegation of abuse is shared with you whilst you are working on a school's premises or relates to incidents occurring in school, you must inform the relevant school.

Appendix C provides a simple flow chart to help you understand and manage a concern.

5f. Helping a child in immediate danger or in need of emergency medical attention

If a child is in need of emergency medical attention, call an ambulance. While you are waiting for it to arrive, get help from a first aider. If the first aider is not available, contact a manager or colleague for support.

You may need to accompany the child to hospital. Should you know or believe that the child has experienced or is at risk of suffering immediate significant harm as a result of any kind of abuse, you must inform the hospital safeguarding lead, as soon as is practically possible and before leaving the hospital.

If a child is at risk of immediate danger or threat to life, then you must speak with a Safeguarding Manager or the Designated Safeguarding Lead immediately. Together, you must ascertain how to manage any risk and to ensure the child is protected. Their safety is paramount.

It may be that the best course of action is to contact the parent or carer and to ensure the child can return safely home. You must then agree the most appropriate steps with the family. It may also be necessary to call the police in order to ensure the child's safety, or to ensure the safety of other children.

Where there is a risk of the Winch provision being targeted, because of any immediate incident, event or concern, you must give due consideration to ensuring other children attending the Winch are safeguarded.

At the earliest possible opportunity, the incident should be recorded in line with the procedures outlined under this policy.

5g. Keeping a record of your concerns

Use the Record of Concern Form (*Appendix E*) to record both the concern and our response, including the rationale for our response. The relevant sections of the form should be completed and signed at each stage of the process. You may use the form to share information with the statutory child protection authorities.

You must complete a Record of Concern factually and accurately, paying particular attention to times and dates, and using the child or young person's own words or direct quotes, where possible. You must also make it clear who is completing the Record at any time, so that colleagues have an accurate and accessible report.

The form should be signed and dated by all those involved in its completion. You must keep the form confidentially on the child's file, sharing copies with the Safeguarding Manager and Designated Safeguarding Lead. The Safeguarding Manager and Designated Safeguarding Lead must record the rationale for any decision they make (*Working together to safeguard children 2023*).

6. Confidentiality & Information Sharing

The Winch has adopted clear principles of confidentiality in relation to children, young people and adults in our care. All personal records and sensitive data relating to individuals must be stored securely and in line with our Data Protection Policy.

It is a legal requirement that agencies and professionals work together around safeguarding issues and to do this effectively we need to be able to share information. The General Data Protection Regulations (GDPR UK) allows organisations to share information about clients without their consent, in some defined circumstances:

- To protect the vital interests of an individual – the ‘vital interests’ condition also extends to any other individual who might be impacted by the abuse;
- Where the individual lacks capacity to give meaningful consent; and/or
- Where the use of information is for the provision of social care, treatment, system and services.

We will never give an assurance of absolute confidentiality. Concerns about confidentiality should never override our safeguarding responsibilities.

The following principles guide information sharing at the Winch, to ensure the sharing is:

- Necessary
- Proportionate
- Relevant
- Accurate
- Timely, and
- Secure.

In most cases, you must seek consent from the relevant individual(s) to share information. In all cases, if you share information in relation to a disclosure, then you must record this and inform the Safeguarding Manager or Designated Safeguarding Lead.

7. Managing Allegations against Staff Policy and Procedure

7a. Purpose

It is essential that we deal with any concern or allegation of abuse made against a member of staff, trustee, volunteer, placement student or intern fairly, quickly and consistently. Our response will ensure we provide effective safeguarding protection and that we appropriately discharge our duty of care to the Winch workforce.

The Managing Allegations against Staff Policy and Procedure sets out the principles and processes through which an allegation or concern will be responded to and managed. For the purposes of this policy, ‘staff’ includes all members of the Winch workforce, whether they hold paid, unpaid or voluntary roles.

7b. Principles

- Our first priority is to ensure that children, young people and adults at risk are safeguarded.
- We will manage any concern or allegation raised by or on behalf of children, young people or adults at risk in a manner that reflects this priority.
- We will ensure a fair, consistent, timely and robust response to any allegations or concerns raised.
- We will escalate any allegations of abuse made against any member of the workforce as a matter of urgency and report this to the Local Authority Designated Officer/Team.
- We have a duty of care towards the Winch workforce. Any member of the workforce facing an allegation will be supported appropriately, and in a manner that does not compromise any investigation or subsequent safeguarding action.

- Predatory adults test organisational boundaries and safeguards before they abuse. We have a duty to the wider children’s workforce to tackle concerns about staff as they arise. This helps reduce the potential for individuals seeking opportunities to abuse or cause harm to have access to vulnerable children in other roles or through other organisations. Any action we take will reflect this duty, so that we contribute to safeguarding all children.
- Where allegations of abuse relate to individuals working in or on school premises, then we must inform the school, using their reporting processes. Where we have low level concerns about agency or contract staff, these should be shared with their employer.

7c. Procedures for Receiving an Allegation

We attach a flowchart outlining the procedure as Appendix F.

An allegation or concern about a member of staff may be raised in many different ways. Allegations may be made directly by a child, young person, adult at risk, by a carer, or they may raise a concern on behalf of someone else. Fellow member of the workforce can also raise concerns. Anyone might share something they have observed or had reported to them. In whatever way someone raises an allegation or concern, the person receiving it must treat the matter seriously and keep an open mind.

Receiving an allegation or concern about a colleague can be discomfoting. This is normal. It can be tempting to dismiss or close down the concern in order to help you manage your own response. The important thing is to acknowledge this, whilst keeping an open mind. Our first priority is to safeguard young people. If you have or receive an allegation of a concern:

Do	Do NOT
<p>Make a confidential, written record of the information, including:</p> <ul style="list-style-type: none"> ● the child/adult’s own words ● the time, date and place of incident(s) ● Information on any witness’s ● The concern or allegation raised ● The full name, date of birth and address of the persons involved ● The full name, date of birth and contact details of the person raising the concern <p>Inform the Designated Safeguarding Lead as a matter of urgency</p>	<p>Don’t investigate or ask leading questions, even if you are seeking clarification or trying to establish any facts.</p> <p>Don’t make assumptions or offer alternative explanations</p> <p>Don’t promise confidentiality or make promises you or others can’t keep</p> <p>Don’t inform any individuals subject to allegations that an allegation has been made</p> <p>Don’t share information more generally or in a manner that could compromise the confidentiality of either the person(s) affected or the person(s) against whom the allegation is raised.</p>

Remember that if an allegation is made against a member of staff you must inform the Designated Safeguarding Lead immediately, who will contact the LADO for further advice. If the concern relates to the CEO or the Designated Safeguarding Lead, you should inform the Lead Safeguarding Trustee (Safeguarding Champion) or Chair of the Winch Board. Failure to report an allegation or concern in accordance with these procedures is a potential disciplinary matter.

7d. Immediate Actions the Designated Safeguarding Lead will take

When informed of a concern or allegation, the Designated Safeguarding Lead should **not** investigate the matter or re-interview the member of staff, child concerned or any potential witnesses. They must:

- Secure the signed and dated written details of the concern or allegation.
- Ensure they have a complete record of any times, dates and location of incident(s) and names of any potential witnesses.
- Record any discussion with the person bringing forward the concern or allegation.
- The Designated Safeguarding Lead will reach out to the LADO for advice within one working day (24 hours). They should not delay a referral in order to gather non-essential information.
- Where applicable, the Designated Safeguarding Lead or Ofsted Nominated Person will also report the concern to OFSTED, within 14 days. We must inform Ofsted if an allegation is made against a member of OFSTED regulated staff, even if the LADO decides no further action is required. Ofsted may follow up to ensure that we are meeting our registration or regulatory requirements.
- Begin a log of all calls, meetings, correspondence and conversations in relation to the allegation / complaint including where appropriate the date, time, attendees, key points and a decisions made and by whom.
- The Designated Safeguarding Lead will ensure they inform and update the Board appropriately.

The allegation must **not** be discussed with the employee until this has been agreed with the LADO and it is agreed what information can be disclosed to the person(s).

7e. Conducting an investigation

The Designated Safeguarding Lead will discuss the allegation or concern with the Local Authority Designated Officer/Team. The LADO may convene a strategy discussion with other appropriate agencies, such as the police, social services, OFSTED, and parents and carers.

The Designated Safeguarding Lead will seek guidance from LADO to find the earliest possible opportunity for informing the parent or carer of a child affected, if they are not already informed and informing them would not put the child at further risk of harm or abuse. This may be in advance of any strategy meeting.

The LADO may conclude that the complaint or allegation is such that an investigation by the police is necessary. In such instances, the police investigation will take priority.

If the LADO concludes that no further action is required, The Winch reserves the right to conduct its own investigation into the allegation and to take action. The Winch will appoint an investigation manager to

investigate the allegations, compile a report and make a recommendation as to whether to consider disciplinary action. The LADO will be informed of the outcome of the process, or if any new and material information comes to light which may warrant a review of any initial decisions.

7f. Suspension

The organisation reserves the right to suspend staff, if it considers it necessary at any stage of an investigative or disciplinary process.

Suspension will be considered where there is cause to suspect a child is at risk of significant harm or has been harmed, if the allegation warrants investigation by statutory authorities, or if is sufficiently serious that it might be grounds for disciplinary action. However, we will not automatically suspend a person or without careful thought. We will consider alternatives to suspension, such as working from a different site or working from home, where appropriate. In all eventualities, staff are not permitted to discuss the allegations with other staff, without express, prior permission.

Suspension or suspension on normal pay is not a disciplinary sanction. There is no right of appeal against this decision. Staff will receive the reasons for the suspension in writing. We will contact staff during the suspension period, at least every ten working days, to keep them up to date with the progress of the investigation or action. Suspended staff are not permitted to contact other staff without express permission being granted (for example, if they are working under alternative arrangements and contact has been agreed), nor are they permitted to discuss the allegations raised with other staff.

During the suspension period, staff must be available for work. They must make themselves available to attend any meetings or participate in any discussions required of them. They may book and take annual leave. If, after a period of paid suspension starts, employees would not have been able to attend work because of sickness, normal pay under the terms of the suspension will cease and the employee will be paid according to the sick pay rules. Staff must cooperate with any investigation and still provide medical certificates, in line with the Winch's standard HR procedures. Where the illness ends, we will recommence pay on suspension.

7g. Timescales

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. Staff must make every effort to avoid any unnecessary delay.

7h. Action on Conclusion of an Investigation

If the allegation is substantiated and the person is dismissed or the person resigns or otherwise ceases to provide their services, the Designated Safeguarding Lead will determine with the LADO whether a referral to the Disclosure and Barring Service is required, or advisable. The Designated Safeguarding Lead and the LADO should review the circumstances of the case to determine whether there are any improvements to be made to the organisation's procedures or practice. Where appropriate, OFSTED should also be informed.

In cases where it is decided that a person who has been suspended can return to work, the Winch will consider how best to facilitate their return. Most people will benefit from some help and support to return

to work after a difficult experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate.

We will place any record of any findings on staff members HR file for a minimum of 7 years.

We will consider how best to inform any child, young person, adult at risk or their family of the outcome of any investigation. Where other agencies or individuals have raised concerns, we will inform them of any actions we agree or undertake.

If an allegation is determined to be false, the Designated Safeguarding Lead, in consultation with the LADO, should also explore appropriate action. This may include seeking additional help for the child, young person or adult at risk. In the very rare event that an allegation is shown to have been fabricated or malicious, then the Winch reserves the right to consider further action or sanction.

7i. Actions where concerns do not meet safeguarding thresholds

The Winch promotes a positive safeguarding culture, in which staff feel able to raise questions or concerns about the conduct of suppliers, contractors, as well as colleagues, to the appropriate staff. Where staff acted responsibly, they will help the Winch to identify and address problematic behaviour early, strengthen professional boundaries, support colleague's personal development and/or orientation to Winch expectations, and minimise the risk of harm.

Problematic or concerning conduct might include:

- Persistent near-breaches of the Professional Conduct policy or testing of professional boundaries
- Disregard of or behaving in dismissive way towards safeguarding policies and procedures
- Lack of respect of children's rights, e.g. consent in participation or in the taking and storing of images, or a persistent lack of respect of children and young people's physical boundaries
- Nurturing exclusive relationships or favouritism with children
- Humiliating or shaming children

These types of behaviours are termed 'low-level concerns' in Keeping Children Safe in Education 2022.

Where staff have concerns they should raise them with the appropriate Safeguarding Manager or the Designated Safeguarding Lead. Where necessary, the DSL should seek advice from the LADO, to establish if the concerns meet the threshold for a referral. If the concerns do not meet the threshold, then the DSL or Safeguarding Manager must address this with the person responsible for the concerning behaviour, having secured the relevant facts, context and circumstances of the behaviour.

In some cases, for instance, where there is a minor misunderstanding of procedure, it may be sufficient to respond by having a conversation to explore the thinking underpinning the behaviour and/or identifying and addressing the dissonance between the behaviour and organisational expectations. In other instances, where the behaviour is more concerning or raises issues of performance or misconduct, a formal meeting or investigation may be convened, followed by more structured actions. This could include professional development, establishing a personal action plan, putting in place a risk mitigation plan or a revised induction plan, and/or initiating disciplinary procedures.

We will hold a record of all 'low level' concerns that contravene the Winch's Professional Conduct on personnel files. They will be stored securely in accordance with data protection regulations and retained in accordance with Winch policy.

8. Whistleblowing

Whistleblowing is making a disclosure in the public interest and occurs when a member of staff or volunteer (or member of the public) raises a concern about danger or illegality that affects others, for example young people attending the Winch.

All staff members should be aware of the duty to raise concerns about the attitude or actions of staff in line with the Professional Conduct Policy, Safeguarding Policy and Whistleblowing policy outlined in the Employee Handbook.

We want everyone to feel able to report any child protection or safeguarding concerns. However, for members of staff who feel unable to raise these concerns to another member of staff, or to trustees, they can seek advice from Protect, the Whistleblowing Charity or the NSPCC.

9. Professional Conduct Policy

9.1 Purpose:

The Professional Conduct policy outlines the behaviour expected from staff and volunteers at the Winch, ensuring that we safeguard children and adults at risk. The Professional Conduct policy applies to all members of the Winch workforce, whether they are paid or unpaid. Employees of the Winch should also refer to their contract of employment and staff handbook.

9.2 Roles and Responsibilities:

At the Winch, we believe it is everyone's responsibility to keep children and young people safe from harm. Members of the workforce have a contribution to make, no matter their role. It is likely that you will be seen by others as a representative of the Winch and must act appropriately.

All members of the workforce must:

- Exercise their duty of care to children and adults at risk¹;
- Provide safe environments for children, in which risks are appropriately managed;
- Follow Winch policies and procedures;
- Model positive behaviour, in line with our organisational values and expectations;

¹ For the purposes of the Professional Conduct policy, we use the term children to include young people. The principles and standards extend to our work with adults at risk.

- Dress in a manner appropriate to their role, the tasks they have to undertake, and with due consideration to the work of the wider organisation;
- Address any inappropriate behaviour, reporting or escalating any concerns, abuse or breaches of the Professional Conduct policy; and
- Disclose any changes to their circumstances that might affect their ability to work with children safely or lead to a loss of confidence or public trust.

9.3 Rights of Children and Young People

Children and young people engaged by the Winch, can expect to be

- Treated fairly and without prejudice, discrimination or favouritism;
- Respected and valued as individuals, with unique strengths, skills, experiences and needs;
- Listened to and encouraged; and
- Protected from harm and abuse.

9.4 Unacceptable Behaviour

Given the nature of the work we undertake at the Winch and the relationships we hold with children and families experiencing adversity, it is not possible to provide an exhaustive list of all behaviours, which might be considered unacceptable. Nor can we always predict the circumstances in which certain behaviours might become or be perceived as unacceptable.

As a general principle, members of the Winch workforce must recognize that they hold a position of trust and power in their relationship with children, young people and adults. They must not exploit this power and trust, or exercise it for their own personal gratification. They must make reasoned professional judgements, which are in the best interest of children and ensure children safeguarded. Where there are any doubts, worries or concerns about professional judgements, they should be escalated to line managers or a safeguarding lead as soon as possible.

The following behaviours are always unacceptable:

- Allowing safeguarding concerns or allegations to go unreported;
- Cultivating or enabling the cultivation of inappropriate relationships with children;
- Soliciting, receiving or inducing personal rewards or gifts, not declaring personal gifts received, or offering gifts with the intention to groom or coerce children;
- Soliciting or inducing physical contact without consent;
- Giving children your own or your colleagues personal contact details (e.g. mobile number, email, social media handles or home address) or having contact with them in your own home;
- Making inappropriate promises or commitments to children;
- Engaging in behaviour that is abusive, including having any form of sexual or intimate contact or exchange with a child, or enticing children to engage in sexual or sexualized behaviour;
- Acting in a way that can be perceived as threatening, intentionally humiliating or abusive; including using punishment, physical punishment or applying sanctions intended to belittle or humiliate;
- Making sarcastic, derogatory or sexually suggestive comments or gestures to or in front of children;
- Behaving unprofessionally with colleagues in front of children;
- Gossiping, over-sharing or inappropriately disclosing private, sensitive or confidential information;
- Administering medication without parental consent or appropriate training; and

- Smoking or vaping, consuming alcohol or using illegal substances when working with children, or attending work under the influence of alcohol or illegal substances.

Staff must uphold the Professional Conduct Policy at all times, reporting any breach or escalating any concern to their line manager or to a safeguarding lead. If necessary, members of the workforce should use the Whistleblowing Policy.

Failure to comply with the Professional Conduct policy will result in disciplinary action.

Appendix A Statutory Framework for Safeguarding & Child Protection

The Children Act 1989 provides the legislative framework for child protection in England. Key principles established by the Act include:

- the paramount nature of the child's welfare
- the expectations and requirements around duties of care to children.

The Children Act 2004 added to the 1989 Act. It encourages partnership working between agencies and created more accountability by placing duties on:

- Local Authorities to appoint children's services members who are ultimately accountable for the delivery of services
- Local Authorities and their partners to co-operate in safeguarding.

The Children and Social Work Act 2017 amended these Acts, and includes:

- Child Safeguarding Practice Review Panel was established to review and report on serious child protection cases that are complex or of national importance
- Local Safeguarding Children's Boards (LSCBs) are replaced by local safeguarding partners
- Child death review partners are required to review each death of a child normally resident in their area and identify matters that are relevant to public health and safety and children locally
- Local Authorities must appoint personal advisers for care leavers up to the age of 25.

Core Policy and Guidance:

Working together to safeguard children (Department for Education, 2018-2023)

An updated version of the key statutory guidance was published in September 2023. It sets out a revised definition of safeguarding and centres the role of the family. It directs how organisations and individuals should work together and how practitioners should assess children.

Keeping Children Safe in Education (2023) outlines what schools and colleges in England must do to safeguard and promote the welfare of children and young people under the age of 18. KCSIE provides guidance on recognising and responding to concerns around pupils at risk of engaging in serious crime and on 'upskirting', details of IT filtering mechanisms, and online checks for job applicants.

Mandatory reporting of female genital mutilation (FGM) (Home Office, 2016)

This guidance gives health and social care professionals, teachers and the police information on their responsibilities under the female genital mutilation mandatory reporting duty.

Ofsted Education Inspection framework (2019) sets out guidance and expectations for the effective management and delivery of safeguarding provision.

The London Child Protection Procedures offer useful and up to date guidance on safeguarding issues. We aim to align the Winch's operating practices to these procedures, as much as is practicably possible.

<https://www.londoncp.co.uk/>

Camden Safeguarding Children's Partnership has replaced Camden's Local Children Safeguarding Board. It is comprised of the Local Authority, Health and Police. It retains a responsibility for ensuring appropriate provision, effective joint working and information sharing, and professional development and learning. It offers useful training, guidance and advice. <https://cscp.org.uk/>

Appendix B Types of Abuse –Definitions, Signs and Symptoms

The signs and indicators are not definitive and act as a guide only.

Type of Abuse	Description	Signs or Indicators
Physical abuse	Assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions	Injuries that are unexplained or have not been treated, e.g. broken bones, bruises, unexplained loss of clumps of hair, or bite, burn or scald marks.
Domestic abuse	Psychological, physical, sexual, financial, emotional abuse, so called 'honour' based violence. Domestic abuse can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.	Coercive or controlling behaviour, verbal abuse and humiliation in front of others, Fear of outside intervention, damage to home or property, or isolation from support or not seeing friends and family.
Sexual abuse	Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, sexual violence, and sexual assault or sexual acts to which the adult has not consented or was pressured into.	Physical injury, changes in behaviour for no apparent reason, sudden onset of confusion or incontinence, uncharacteristic use of explicit sexual language, self-harming, poor concentration, withdrawal, disturbed sleep, excessive fear/apprehension of, or withdrawal from, relationships
Psychological abuse	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, Verbal abuse, cyber bullying, isolation, or unreasonable and unjustified withdrawal of services or supportive networks.	Withdrawal or change in the psychological state, insomnia, low self-esteem, aggressive behaviour, change of appetite, weight loss/gain, signs of distress: tearfulness, anger, fearfulness or ambivalence towards carers, paranoia.
Financial or material abuse	Theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or	Missing personal possessions, rent arrears and eviction, unexplained lack of money or inability to maintain lifestyle, withdrawal of funds from accounts, power of attorney obtained after the person has ceased to have 'mental capacity'.

Type of Abuse	Description	Signs or Indicators
	misappropriation of property, possessions or benefits.	
Modern slavery	Slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.	Signs of physical or emotional abuse, appearing withdrawn or malnourished, isolation from the community, seeming under the control or influence of others, living in dirty or overcrowded accommodation and/or living and working at the same address, lack of personal belongings or identification documents, always wearing the same clothes.
Discriminatory abuse	Forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.	Hate mail, email or social media posts, verbal or physical abuse in public places or residential settings, damage to property, target of unrequested services Tendency to withdrawal and isolation, Fearfulness and anxiety, being refused access to services or being excluded inappropriately, Loss of self-esteem, resistance to access services required to meet need, anger and frustration.
Organisational abuse	Neglect and poor care practice within care settings or in care provided in at home. This ranges from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.	Inadequate staffing levels People being hungry or dehydrated, poor standards of care, lack of personal clothing and possessions, communal use of personal items, lack of adequate procedures, absence of individual care plans, missing documents.
Neglect and acts of omission	Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.	Dirty or unhygienic environment, poor physical condition or personal hygiene, pressure sores or ulcers, malnutrition or unexplained weight loss, untreated injuries and medical problems, untaken medication, inadequate clothing.
Self-neglect	This covers a wide range of behaviour neglecting to care for	Very poor personal hygiene

Type of Abuse	Description	Signs or Indicators
	one's personal hygiene, health or surroundings and includes behaviour such as hoarding.	lack of essential food, clothing or shelter, malnutrition or dehydration living in squalid or unsanitary conditions, neglecting household maintenance, collecting a large number of animals in inappropriate conditions, Non-compliance with health or care services

Working together to safeguard children (2023a) amends the guidance on 'Early Help'. The update adds that professionals should be alert to the need for early help for a child who:

- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- has a parent or carer in custody or is affected by parental offending.

The statutory guidance has also updated its use of the terms 'abuse and neglect' to 'abuse, neglect and exploitation.' The definition of 'abuse' has changed to clarify that harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.

Other Concerns

Adults at risk (see separate policy) and children and young people may also experience other forms of abuse, neglect or harm, including:

1. Hate Crime

A hate crime is any criminal offence that is motivated by hostility or prejudice based upon the victim's disability, race, religion or belief, sexual orientation or transgender identity. Hate crime can take many forms including; physical attacks, the threat of attack and intimidation, verbal abuse, abusive gestures, bullying, and the use of electronic media to abuse, insult, taunt or harass. Hate crime should be reported to the local police.

2. Forced marriage

Forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. In a situation where there is concern that an adult at risk is being forced into a marriage they do not or cannot consent to, the police must be contacted immediately.

3. Female Genital Mutilation (FGM)

FGM is a procedure where the female genitals 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 criminal offence – it is child abuse and a form of violence against women and girls and should be treated as such. It is illegal in England and Wales under the Female Genital Mutilation Act 2003. The Serious Crime Act (2015) introduced a mandatory reporting duty that requires specified professionals to report known cases of FGM in young people aged under-18 to the police.

4. Prevent – Preventing radicalisation and extremism

The Prevent strategy forms part of the UK's Counter Terrorism and Security Act (2015). It places a legal duty on the organisation to have 'due regard' to the need to prevent people being drawn into terrorism. Prevent ostensibly aims to provide support and re-direction to vulnerable individuals at risk of being groomed into terrorist activity before any crimes are committed. Radicalisation is comparable to other forms of exploitation, such as grooming and coercion; it aims to persuade individuals, often at risk, to adopt extreme views, persuade them to the legitimacy of their cause, and act contrary to their best interests. This may be achieved through an in-person relationship or through social media.

The Winch has a specific policy on Prevent. If there is any doubt as to whether a form of harm experienced by an adult at risk falls under the Prevent Duty or a safeguarding duty, then the safeguarding process should take precedent in the first instance.

5. Child Sexual Exploitation (CSE) and County Lines

The Department for Education's non-statutory advice (2017) defines Child Sexual Exploitation as:

"A form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity

- In exchange for something the victim needs or wants, and/or
- For the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology".

Any child can fall victim to sexual exploitation, regardless of their gender or age. Children as young as eight have been known to be affected. Young people facing systemic disadvantage, with additional vulnerabilities, or who are affected by other types of crimes, are often considered more at risk of exploitation. Children can

be both experiencing child sexual exploitation and perpetrating it at the same time. For examples, a child may be forced to take part in the exploitation of another child under duress.

Children can be trafficked into the UK or groomed for the purposes of exploitation. Informal groups or organised gangs or criminals can exploit them. They can be moved around the country for the purposes of exploitation, commonly known as 'County Lines'. They may also frequently go 'missing'.

CSE can be difficult to identify. Children affected can often feel too scared to report it. They might not name it as such, or may disclose it indirectly. They may take time to build up trust with a professional or they may feel conflicted or confused by their experiences. Victims of CSE have reported they have not always been believed or encouraged to speak out. Historically, some victims of exploitations have been blamed, shamed or made to feel responsible for their exploitation. In some instances, it has been assumed that because children are legally of an age to consent to sex, their sexual relationships are therefore consensual. We should always remember that children are victims, who are often groomed by people in a position of trust or power over them.

Identifying Child Sexual Exploitation or County Lines activity often relies upon practitioners undertaking holistic assessments of young people, practitioners remaining vigilant, curious and open to the possibility of abuse being perpetrated, and the appropriate sharing of information with the relevant authorities.

The London Child Protection Procedures offer comprehensive guidance on identifying the signs of Child Sexual Exploitation and provides advice on how to respond.

6. Serious Youth Violence

There is evidence of the strong links between children going missing, serious youth violence, gang affiliation, criminal and sexual exploitation. This highlights the importance of safeguarding young people at risk.

Serious youth violence refers to harmful behaviours that can start early and continue into young adulthood. Serious youth violence is often, but not only, violence against children. The young person can be a victim, an offender, or a witness to the violence. It is important to remember that knife crime does not exist in a vacuum and children who are victims or perpetrators may be experiencing multiple vulnerabilities. Young women are especially at risk of grooming, coercion and sexual exploitation.

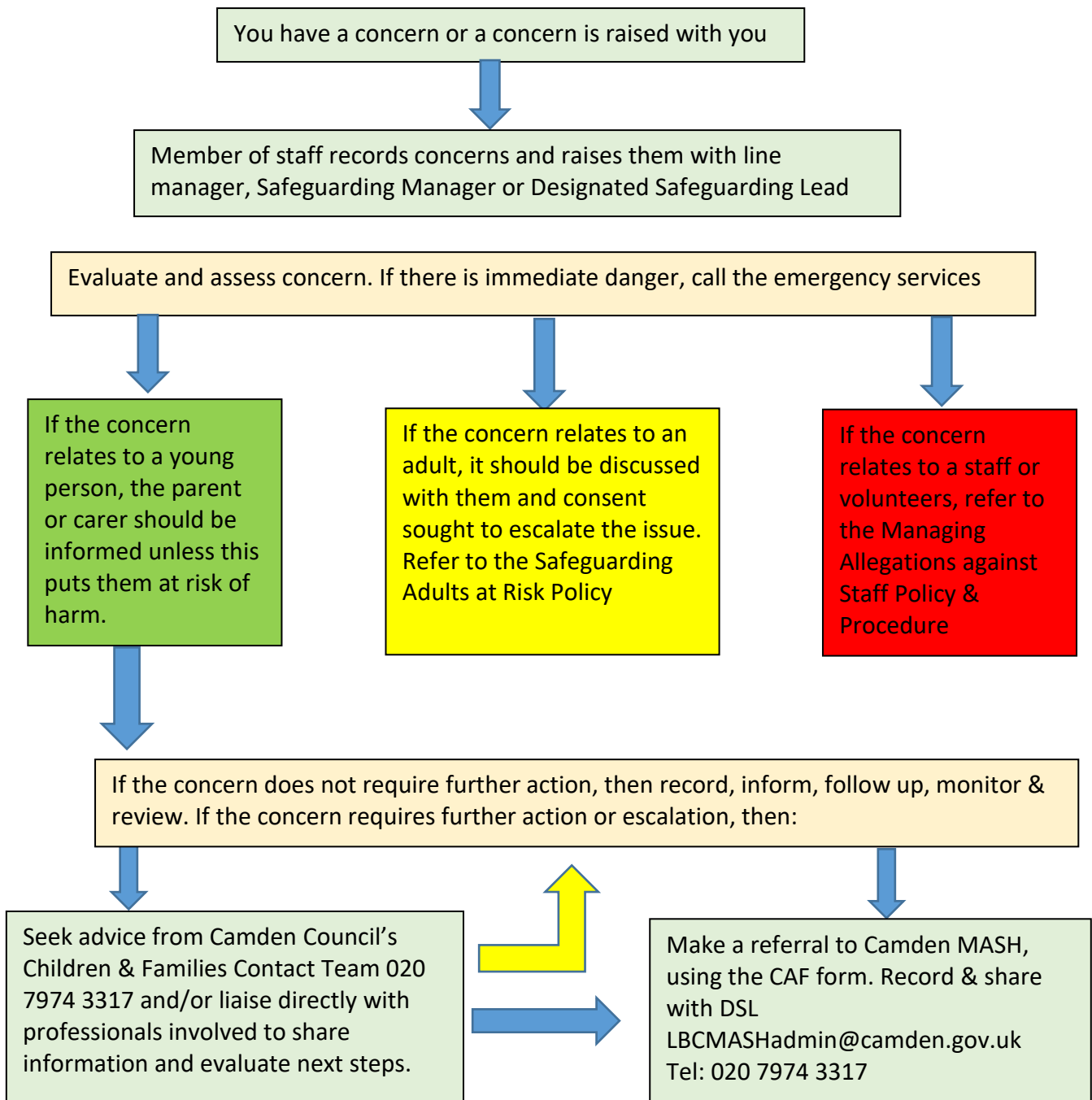
Keeping Children Safe in Education (Department for Education 2019-2023) requires all staff to be alert to indicators that could signal that children are at risk from, or involved with, serious violent crime.

The indicators of young people engaged in serious youth violence, include:

- Increased, unexplainable or persistent absence from school or home
- a change in friendships or relationships with older individuals or groups
- a significant decline in engagement and a decline in interest in or performance at school
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions.

The London Child Protection procedures offer comprehensive guidance on Safeguarding Children affected by Gang Activity / Serious Youth Violence.

Appendix C What to do if you have a concern about a child



You must inform the Designated Safeguarding Lead of all referrals, at the earliest possible opportunity, and of any subsequent developments or changes.

Appendix D Making a Referral

Help and Advice

For early help and safeguarding advice, information and support, you can contact the [Children & Families Contact Team](#) at Camden Council. The Children and Families Contact service incorporates the Multi-Agency Safeguarding Hub (MASH) team and the First Stop Early Help team. The team provides access to the right help at the right time, as well as offering support to professionals.

If you want to find out more about the type of help your concern might result in, please refer to Camden's 'threshold' document. It is available via the Camden Safeguarding Children Boards website: <http://www.cscb-new.co.uk/>

To contact Camden Council's Children & Families Contact Team:

Phone: 020 7974 3317 (out of hours 020 7974 4444)

Email: LBCMASHadmin@camden.gov.uk.

How do I make a referral to Camden?

If you need to refer a child for a service should complete a **CAF referral** (available to download [here](#) or in the policies folder) and send it to the following email addresses:

LBCMASHadmin@camden.gov.uk.cjism.net (secure email address)

LBCMASHadmin@camden.gov.uk (not a secure address so documents should be password protected)

Tel: 020 7974 3317

What about consent?

Before sending the CAF, you should inform the child and acknowledge their views. You must notify parents that you are making a referral and seek their consent. You can still make a referral if a child or their parents refuse consent, where there are clear child protection concerns. You should record and discuss these circumstances with MASH.

You can contact the MASH social worker on 020 7974 3317 to discuss cases on a 'no names' basis if you are unsure about whether to make a referral or whether to seek consent to a referral. The MASH social worker can also give advice.

You can also get independent advice from:

- NSPCC Helpline: 0808 800 5000 or help@nspcc.org.uk
- ChildLine: 0800 1111 (text phone 0800 400 222) or www.childline.org.uk

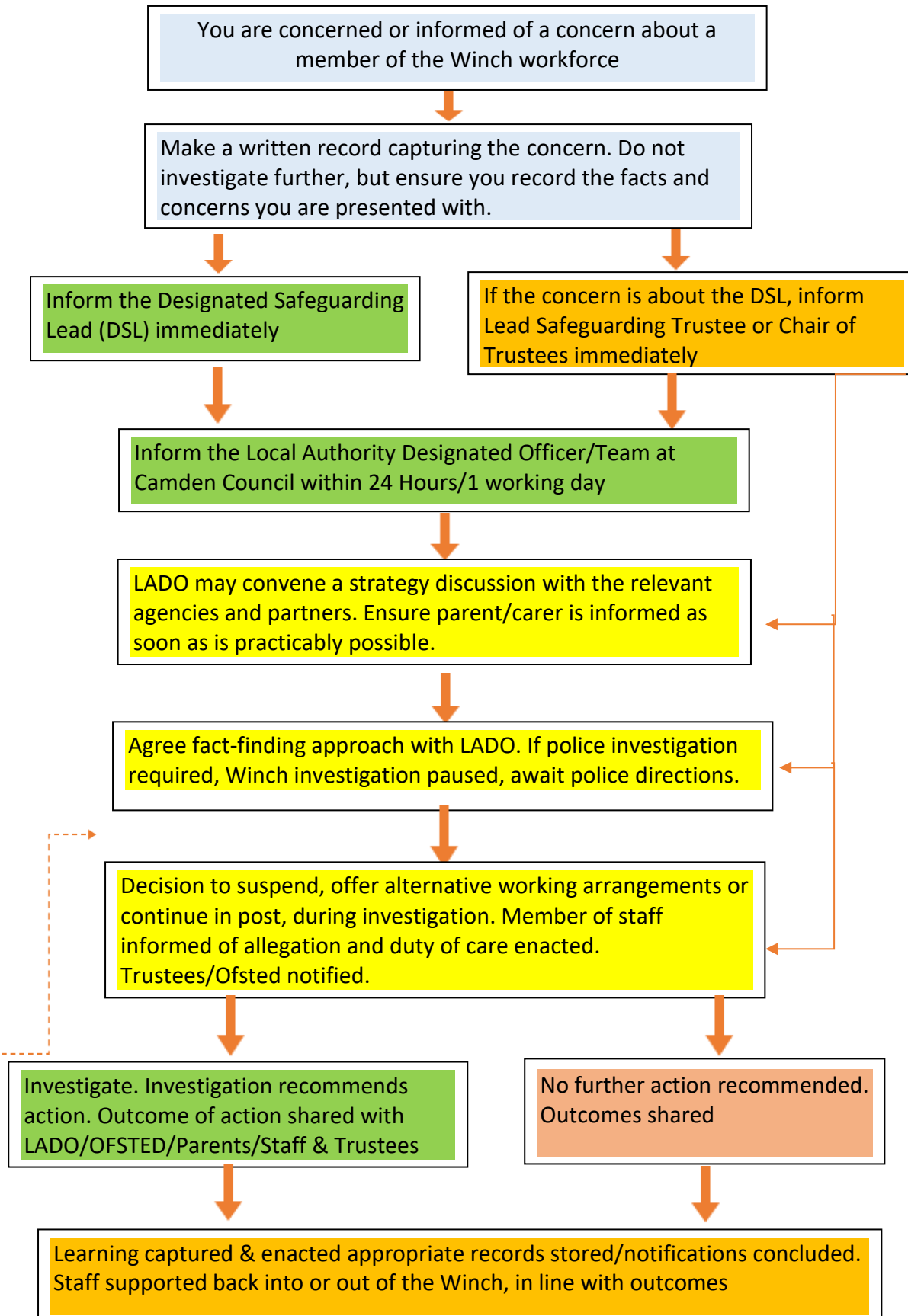
Appendix E Record of Concern

Child/Young Person's Name			
Date of Birth		Gender:	
Address			
Parent/ Carer Name and Contact Details			
Staff Name <i>(Print clearly)</i>		Date Form Completed	
Job Title			
Who has raised the concern?	<i>These are my own concerns</i>	<i>I am responding to concerns raised by someone else. Their contact details are:</i>	
Record the following facts: What is the concerns? What are you worried about? If there was as specific incident, please record the facts; including Who? What? Where? When? Record any witnesses also.			
What did the child/adult/witnesses say? (Use <i>their</i> words if possible)			
What was your initial response? What did you say/do?			

Any other relevant information – such as any previous concerns or other children affected/involved, or any signs and symptoms of abuse:	
Who have you shared your concern with? What will you/they do? Why have you decided this course of action?	
Have you spoken to the Parents/Carer? <input type="checkbox"/> Yes <input type="checkbox"/> No	<i>If yes, please provide details below:</i>
What needs to happen next? Note actions, including names of anyone to whom your information was passed to and when.	
<i>Add new text box below for with any update; including who the update is made by and the date.</i>	

Staff Signature:	
Date and Time:	
Shared with Safeguarding Manager (name)	
On the following date:	

Appendix F: Managing Allegations against Staff Flow Chart



CHILD PROTECTION POLICY

At the Winch, we believe that it is always unacceptable for a child or young person to experience abuse of any kind. We have a responsibility to safeguard and promote the welfare of all children and young people. We are committed to protect them from abuse.

We recognise that:

- the welfare of the child/young person is paramount
- all children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- working in partnership with children, young people, their parents and carers and other agencies is essential in promoting young people's welfare.

The purpose of the policy:

- To provide protection for the children and young people who use The Winch's services, including the children of adult members or building users.
- To provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a child or young person may be experiencing, or be at risk of, harm.

Our Child Protection Policy applies to all staff, including senior managers and the board of trustees, paid staff, volunteers and sessional workers, agency staff, students or anyone working for The Winch.

We will seek to safeguard children and young people by:

- valuing them, listening to and respecting them
- adopting child protection policies and practices, including a code of conduct for staff and volunteers
- recruiting staff and volunteers safely, ensuring all necessary checks are made
- sharing information about concerns with agencies who need to know, and involving parents and children appropriately
- sharing information about child protection and good practice with children, parents, staff and volunteers,
- providing effective management for staff and volunteers through supervision, support and training.

In accordance with the relevant legislation and guidelines:

- The Children Act 1989
- The Education Act 2002
- The Children Act 2004
- The London Child Protection Procedures (2016)
- Working Together to Safeguard Children (2018-23)

We are committed to regularly reviewing our policy and practice.

Safeguarding at the Winch

If you have a safeguarding concern about a child or adult at The Winch, please raise this with any member of staff at the Winch, who will try to help or direct you to help.

The Designated Safeguarding Lead is at The Winch is:

Rashid Iqbal Chief Executive Officer
Contact: rashid@thewinch.org
Tel: 020 75868731

The Safeguarding Manager for young people under-11 (Primary Years) is:

Kim Mabbutt Play Development Officer
Contact: Play@thewinch.org
Tel: 020 75868731

The Safeguarding Manager for young people and young adults is:

Jim Chynoweth Head of Youth
Contact: Jim@thewinch.org
Tel: 020 75868731

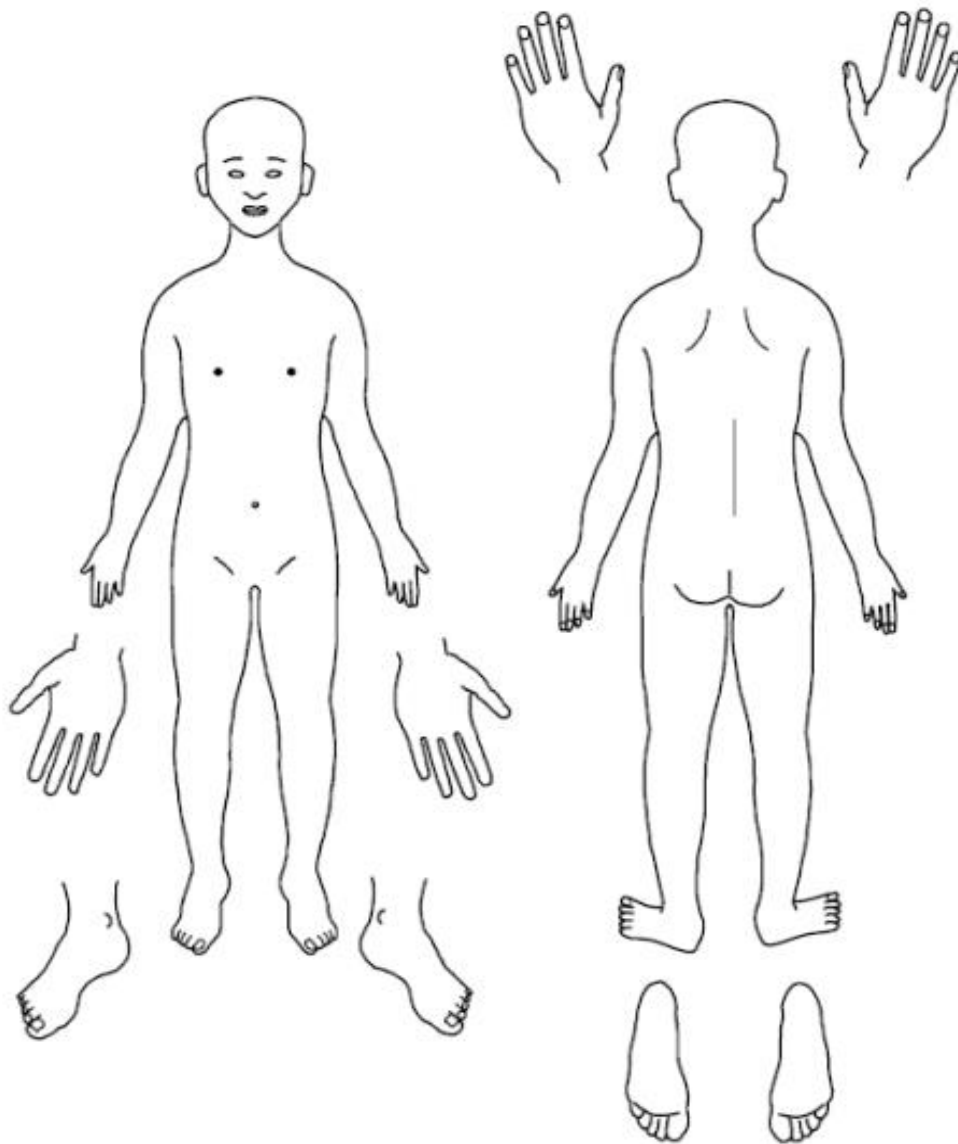
Our Lead Safeguarding Trustee and Safeguarding Champion is Sue Godwin.

If you are worried about a child or young person in Camden, you can contact Camden Council Children and Families Contact Team on : 020 7974 3317.

If you have a concern about a member of staff, then please let us know and we will raise it with the Local Authority Designated Officer on duty in Camden Council

Appendix H: Body Map

Name of Child:	Child Date of Birth:
Date Map Completed:	Completed By:
Observations:	





Additional Comments (including child's own comments):

Appendix I: Contextual Safeguarding Guidance

Purpose:

The purpose of this guidance is to help staff understand Contextual Safeguarding. It offers direction on how to apply some of the insights from Contextual Safeguarding in our safeguarding thinking and practices, and where to learn more about it.

Definition:

Contextual Safeguarding seeks to understand child protection risks beyond the family. It promotes extending the capacity to safeguard children from the home to the neighbourhood; to other places, *or contexts*, where young people spend their time, including schools and the community.

Contextual Safeguarding recognises that as children and young people grow, they engage with different environments and contexts, like schools, their neighbourhood, with their peers, and online. These contexts present different risks to different young people. As these contexts are often inter-related, young people can encounter multiple risks. This is particularly the case for adolescents, who naturally begin to spend more time out of their home and under the influence of their peers. From robbery on public transport, sexual violence in parks and gang related violence on streets, through to online bullying and harassment from school-based peers and abuse within their intimate relationships, young people can encounter significant harm in a range of settings, beyond their families.

Contextual Safeguarding is a concept developed by Dr Carlene Firmin, Durham University. The University of Bedfordshire hosts the Contextual Safeguarding Network

How can I find out more about Contextual Safeguarding?

The NSPCC offers a helpful overview of Contextual Safeguarding entitled: Contextual safeguarding: what is it and why does it matter? (Oct 2019)

<https://learning.nspcc.org.uk/news/2019/october/what-is-contextual-safeguarding/>

The Contextual Safeguarding Network offers lots of free resources and guidance to practitioners. It is free to join.

<https://www.csnetwork.org.uk/en/>

The Department for Education also reference Contextual Safeguarding approached in the Annexes to 'Definition and A Guide for Practitioners, Local Leaders and Decision Makers Working to Protect Children from Child Sexual Exploitation' (February 2017).

What are the implications for my work? What should I do?

“Contextual Safeguarding ... means assessment of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety, and/or welfare” Keeping Children Safe in Education, (2019),

The Contextual Safeguarding approach aims to disrupt or limit the risks of harmful contexts, beyond the family home. The children and young people we work with may be exposed to or affected by harm in different local or online contexts. Their experiences of harm will also influence the way they behave outside these contexts. So, if a young person forms relationships in a context characterised by violence and abuse, it is likely that their relationships will be harmful and/or that they will feel the need to adopt problematic social norms to navigate and survive in harmful spaces. They may then continue these problematic behaviours in other spaces or places.

Contextual Safeguarding encourages practitioners to consider the ‘weighting’ of different factors in young people’s contexts and to consider their interplay. For example, peer influence is often more heavily weighted in adolescence, and in a neighbourhood with higher levels of gang-related risk, peer influences maybe a stronger determinant of problematic social norms and behaviours than a positive family context. Any intervention in this context therefore needs to address peer-influence and gang-related risk to effect change, rather than focus solely on the family.

The approach also acknowledges and appreciates the role positive contexts have to play in children and young people’s lives. It suggests that if young people form relationships and socialise in safe and protective settings, then they are more likely to form safe and protective peer relationships.

Contextual Safeguarding therefore should encourage Winch staff to consider the local contexts and the extra-familial dynamics for children in designing and delivering systems of safety and interventions. The approach offers a lens that is seeks to more holistically understand and address the factors that shape young people’s lives.

Ultimately, Contextual Safeguarding lends itself to placing an emphasis on local collaboration and information sharing. Everyone working in the neighbourhood or community has a play to play in helping every child to succeed, and in safeguarding children young people.

Appendix J: Child on Child Abuse

What is Child on Child Abuse?

Child on child abuse is any form of abuse, which is exercised between children, within children's relationships, and in their wider peer associations. In this context, we define 'children' to include any person under the age of 18. Abuse, includes all of the types of abuse described in this policy (see Appendix B), including physical, sexual, emotional and financial abuse, and coercive control between peers.

Child on child abuse can take various forms, including serious bullying, relationship abuse, domestic violence and abuse, child sexual exploitation, violence, harmful sexual behaviour* and/or prejudice-based violence including gender-based violence.

Child on child abuse can often occur online or have a digital element, for example; the sharing of youth-involved sexual images, sexting or the distribution of sexualised content, online coercion and exploitation, grooming, abusive online language, cyberbullying and harassment.

*What are Harmful Sexual Behaviours?

For the purposes of this policy, we define Harmful Sexual Behaviours as:

"Sexual behaviours expressed by children that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child, young person or adult."

From Prof. Simon Hackett 2014

It is important to note that any definition of harmful sexual behaviours must start with an acknowledgement that children's sexual behaviours exist or presents on a continuum. As the Department for Education Advice *Sexual violence and sexual harassment between children in schools and colleges* (2018) outlines: "Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage".

What is 'normal' behaviour will vary across time and place, and between individuals. For example, a child of 16 with severe cognitive impairment or disability may experience developmental delay, and so have a different capacity for informed consent. Holistic, informed and shared assessments, made by practitioners aware of their own bias or expectations of normative behaviour, are therefore critical to evaluating whether complex behaviour is problematic or abusive.

The model below sets out a framework for assessing such behaviour:

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviour	Victimising intent or outcome	Physically violent sexual abuse
Socially accepted	Socially acceptable behaviour within peer group	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure compliance	Instrumental violence which is psychologically and/or sexually arousing to the child
Shared decision making	Generally consensual and reciprocal	Consent issues may be unclear	Intrusive	responsible for the behaviour
		May lack reciprocity or equal power	Informed consent lacking or not able to be freely given	Sadism
		May include levels of compulsivity	May include elements of expressive violence	
<i>Harmful Sexual Behaviours Continuum</i>				

How will I recognise when peer relationships or behaviours are abusive?

Not all difficult relationships are abusive and not all sexual contact between young people can be described as sexually harmful. Children will explore their sexuality as part of normal development. Children are also human, prone to mistakes or poor decision-making.

In trying to determine whether abuse has taken place, practitioners should consider:

- Consent or its absence, and any power imbalance or exploitation
- The nature of the relationship between the ‘perpetrator’ and ‘victim’
- What might be age or developmentally appropriate
- Frequency and period of time over which any inappropriate behaviour has occurred
- The child/young person’s perception of the behaviour

- The contexts in which the behaviour took place
- Secrecy

You should use the Brook Sexual Behaviours Traffic Light Tool to inform your assessment: https://www.proceduresonline.com/manchester/cs/user_controlled_lcms_area/uploaded_files/Brook%20Traffic%20Light.pdf

What does the law say?

The legal age for children and young people to consent to sex is 16, regardless of sexual orientation. This does not affect young people's right to confidential advice on contraception, pregnancy and abortion.

Sexual offences legislation assumes that children and young people under 13 do not have the capacity to consent to sexual activity. A person is deemed to consent if they agree by choice and has the freedom and capacity to make that choice. A person may not have the freedom to consent because they are forced by, for example, violence or threat of violence, to engage in sexual activity.

It is illegal for an adult who is in a position of trust with a child (under 18), such as a teacher or youth worker, to have sex with them. It is also against the law to persuade a child to take part in sexual activity, to engage in sexual activity in their presence, to cause them to watch a sexual act (including photos, videos or online images) or to arrange to meet them following sexual grooming. The law covers all intercourse, other penetration or sexual touching of a child.

What should I do if I am concerned about Child on Child Abuse?

As with all safeguarding concerns, you should never feel you have to manage on your own. Seek advice and raise your concern with your line manager or a safeguarding lead.

Child on child abuse is complex. If you are concerned that a young person is presenting inappropriate or problematic behaviour, or if their behaviour is appearing as Amber on the Brook Sexual Behaviours Traffic Light Tool, you should take notice and seek further advice. You may need to gather further information to fully understand the behaviour and/or its context. You may need to share information appropriately with partners or parents to determine the best course of action.

If the behaviour is violent or abusive, or is appearing as Red on the Brook Sexual Behaviours Traffic Light Tool, you will need to take immediate action in line with our 'Making a Referral' processes (Appendix D).

You should refer to the Child on Child Abuse Protocol: guidance for schools and children's services in Camden, produced by the Camden Children Safeguarding Partnership:

<https://cscp.org.uk/wp-content/uploads/2022/09/Child-on-child-abuse-and-sexual-violence-guidance-for-schools-2022.pdf>

Following the revelations of the Everyone's Invited Campaign, the government has commissioned a specific helpline for young people experiencing sexual harassment and abuse in education. The dedicated NSPCC Helpline - Report Abuse in Education – can be contacted by phone on **0800 136 663**, or by emailing help@nspcc.org.uk. Young people, their families and professionals can use this service.

It is important to consider actions carefully to ensure children are safeguarded. This may involve undertaking a risk assessment or creating a safety plan for the child, which is proportionate to the harm or level of risk the child may be exposed to. Any plan should also explore the strengths and positive factors in the child's environment.

Further helpful guidance, albeit information that is targeted to schools, is available [here](#) and the public link is as follows:

<https://www.farrer.co.uk/news-and-insights/addressing-child-on-child-abuse-a-resource-for-schools-and-colleges/>