Safeguarding

Young People Policy

All MacIntyre policies are formally reviewed by the Policy Owner and Lead Reviewer and are subject to   3 yearly reviews, or sooner when there is a change to relevant legislation or the organisation

➢ For the date of, or evidence of, the most recent review, please see *'MacIntyre policy and associated guidance list'*.

➢ LINK: https://www.macintyrecharity.org/policies-and-resources/macintyre-policy-and-associated-guidance-list-main/

Document Control

Title:	Safeguarding Young people Policy
Issue number	8
Scope of document	All staff working with young people in No Limits and Adult Services (MacIntyre School Wingrave has its own separate policy)
Lead Director	Rachelle Russell (Director of Education)
Lead Reviewer	Yvonne Nugent (Head of Operations, No Limits)
Document effective date	1³ᵗʰ January 2021 – front page revised 12.2023

Previous versions

Issue number:	7
Title if different	Safeguarding of Children and Young People – Policy and Procedures
Scope of document	All staff working with children and young people in No Limits and Adult Services (MacIntyre School Wingrave has its own separate policy)
Document effective date	8th July 2020

Issue number:	6
Title if different	Safeguarding of Children and Young People – Policy and Procedures
Scope of document	All staff working with children and young people in No Limits and Adult Services (MacIntyre School Wingrave has its own separate policy)
Document effective date	24ᵗʰ April 2019

Issue number:	5
Title if different	
Scope of document	All staff working with children and young people in No Limits and Adult Services (MacIntyre School Wingrave has its own separate policy)
Document effective date	5ᵗʰ February 2019

Issue number	4
Title if different	
Scope of document	All staff working with children and young people in No Limits and Adult Services (MacIntyre School Wingrave has its own separate policy)
Document effective date	29ᵗʰ June 2018

Issue number:	3
Title if different	
Scope of document	All staff working with children and young people in No Limits and Adult Services (MacIntyre School Wingrave has its own separate policy)
Document effective date	03/2017

Issue number:	2
Title if different	
Scope of document	All staff working with children and young people in No Limits and Adult Services (MacIntyre School Wingrave has its own separate policy)
Document effective date	09/2015

Issue number:	1
Title if different	No Limits Safeguarding of children and young people – Policy and procedures
Scope of document	MacIntyre No Limits services
Document effective date	07/01/2015

Timetable for review
This policy will be reviewed annually

Contents

1   Introduction

Safeguarding and promoting the welfare of young people is everyone's responsibility. Everyone who comes into contact with young people and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is young person-centred. This means that they should consider, at all times, what is in the best interests of the young person. MacIntyre is committed to participating in a multi-agency approach to all safeguarding arrangements.

At MacIntyre, we recognise the importance of keeping our young people safe and happy and promoting their sense of positive wellbeing at all times. We aim to create a culture of vigilance and promote the welfare of all our young people. We seek, at all times, to take timely and appropriate safeguarding action. Because of the range of disabilities of the young people supported by MacIntyre, they are very likely to be unable to communicate or express themselves well and to have a limited understanding of the world around them.

We recognise that *ALL* adults, including staff and any other visiting professional from MacIntyre or other bodies, have a full and active part to play in safeguarding young people from harm, and that the young person's welfare is our paramount concern. All staff members believe that MacIntyre should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual young person. We understand that safeguarding concerns could occur anywhere in MacIntyre and emphasise to staff that they should always be vigilant and must raise an alert if they have a concern.

Staff working with young people are advised to maintain an attitude of '**it could happen here'** where safeguarding is concerned. When concerned about the welfare of a young person, staff should always act in the best interests of the young person. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should **always** speak to the Designated Safeguarding Lead (or deputy) or their manager or the local safeguarding authority.

Each of the No Limits services has a Designated Safeguarding Lead (DSL) who works closely with their partnering School and College's Designated Safeguarding Lead (DSL), working together to provide support to staff to carry out their safeguarding duties and who liaise closely with other services such as children's and adults social care services.

2   Scope

This policy relates to young people from 16 until their 18th birthday at MacIntyre's No Limits services and at Adult Services. MacIntyre School has its own separate safeguarding policies.

This policy is written in accordance with:
- Keeping Children Safe In Education 2019
- Working Together to Safeguard Children 2018
- Children and Social Work Act 2017
- 'What to do if you are worried a child is being abused' DfE 2015
- Children and Families Act 2014

- Disclosure and Barring Service (DBS) 2012
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- The Education Act 2002

The policy should be read alongside the Staff Code of Conduct and other relevant MacIntyre policies.

For young people who are funded through a school or college, this policy should be read in conjunction with the school or college's safeguarding policy.

For young people who are funded through local authorities, this policy should be read in conjunction with the local authority's own Safeguarding policy and procedures.

3   Policy

- All our staff and volunteers have a duty to protect young people from abuse. This duty applies not only to the young people we support, but also to other young people with whom our services come in contact.
- MacIntyre will support young people by:
    - Providing a person-centred environment whereby young people feel safe
    - Encouraging the development of self-esteem and resilience in every aspect of MacIntyre's activities
    - Promoting a caring, safe and positive environment within MacIntyre
- MacIntyre is committed to a multi-agency approach to safeguarding arrangements, and will actively work with partner organisations to ensure the safety of young people, including those who come into contact with our services as well as those receiving them
- MacIntyre is committed to the principle of early help - providing support as soon as a problem emerges, at any point in a young person's life – as more effective in promoting the welfare of young people than reacting later
- MacIntyre will report all allegations of abuse to the appropriate safeguarding lead and the relevant local authority (if appropriate) as soon as there is a significant concern, and will report serious incidents to the Charity Commission
- MacIntyre will ensure that all staff are recruited through a process that meets the requirements as set down in the ['Keeping children safe in education'](#) guidance; and that all appointing officers complete the NSPCC safer recruitment training.
- A structured programme of induction will be provided for all new staff. Induction will ensure that employees' approach is young person-centred; this means that they should consider, at all times, what is in the best interests of the young person; and will enable staff to understand what behaviour is and is not acceptable, understand what might constitute abuse and who should be informed if abuse is suspected
- MacIntyre services will ensure that all young people receiving support, or others on their behalf, are actively encouraged to understand, recognise and report abuse, and comment and complain about the service they receive. MacIntyre will take such reports and complaints seriously
- Where a young person supported by MacIntyre is subject to local authority protection

procedures, we will advocate for the young person to be kept at the centre of the process

- Any member of staff suspected of abuse will be subject to disciplinary procedures
- Staff have a duty to report, and failure to do so is a serious abdication of responsibility and may incur disciplinary action
- Staff must be aware of what constitutes a concern about a 'person in a position of trust' (PiPoT – see Good Practice Guidance Appendix 7) and are strongly encouraged to consider reporting any concerns about a PiPoT (whether or not that person is an employee of MacIntyre)
- Any sexual activity between a staff member and a young person is illegal and will be treated as abuse, irrespective of any apparent consent (Sexual Offences Act 2003)
- MacIntyre recognises that it can be very stressful for staff to be involved in the safeguarding investigation and protection process, and will provide appropriate support to staff
- MacIntyre will support young people in our services who have been victims of abuse. MacIntyre will support people in our services who are alleged perpetrators as appropriate, accessing specialised support and training if relevant

MacIntyre monitors allegations of abuse and the way that we safeguard people, and uses this information to implement improvements, sharing good practice across the organisation

4   Definitions

MacIntyre adopts the definition of Safeguarding from 'Keeping Children Safe in Education'.

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Safeguarding is not just about protecting young people from deliberate harm; it relates to aspects of life including:

- Health and safety
- Meeting the needs of young people (CYP) with medical conditions
- Providing first aid
- Intimate care
- Internet or e-safety

Safeguarding can involve a range of potential issues such as:

- Bullying, including cyberbullying (by text message, on social networking sites, and so on) and prejudice-based bullying
- Racist, disability, and homophobic or transphobic abuse
- Radicalisation and extremist behaviour

- Child sexual exploitation (CSE)
- 'Sexting'
- Substance misuse
- Issues that may be specific to a local area or population, for example gang activity and youth violence
- County lines (criminal exploitation)
- Particular issues affecting young people including domestic violence, sexual exploitation, female genital mutilation and forced marriage
- Fabricated or induced illness
- Teenage relationship abuse
- Trafficking

For young people with special educational needs and disabilities (SEND) additional barriers can exist when recognising abuse and neglect. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's impairment
- Young people with SEND can be disproportionally impacted by issues such as bullying without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

'Early help' is the principle of providing support as soon as a problem emerges, at any point in a young person's life. Staff should discuss any concerns about a child and its family with their line manager, who may in turn discuss with a social worker in the local authority. Local authority children's social care will have a process for how this will happen. For further details on how staff should respond to emerging problems, see the relevant sections of 'Keeping children safe in education' and 'Working Together to Safeguard Children'.

Research tells us that young people with special needs (SEND) are at an increased risk of abuse.

Some young people display specific indicators of abuse at all times and where these may have been shown not to be as a result of abuse it is important to monitor any changes in a young person's behaviour, physical condition, emotional state and sociability. Such changes may themselves indicate that abuse is taking place.

Staff should read individual learners' files to familiarise themselves with medical conditions that can present with the same symptoms as abuse.

Because such judgements often require sophisticated knowledge and understanding all staff must err on the side of caution. It is better to report cases where no abuse is occurring than to miss one case because a wrong assumption has been made. If there is any worry or concern about a young person it must be reported.

5   Categories of Child Abuse

Keeping Children Safe in Education identifies the following types of abuse:
- Physical
- Neglect
- Sexual abuse
- Emotional/psychological abuse

MacIntyre also recognises the following types of abuse:
- Domestic Abuse
- Institutional Abuse
- Self-neglect
- Financial Abuse

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. Physical abuse also includes fabricated illness, whereby a parent or significant adult feigns the symptoms of, or deliberately causes the ill health of, a young person. It may also include kicking, misuse of medication, restraint or inappropriate sanctions.

Neglect

Neglect Is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in serious impairment of the young person's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a young person from physical and emotional danger; failing to ensure adequate supervision or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs.

Sexual Abuse

Sexual abuse involves forcing or enticing a young person to take part in sexual activities, including prostitution, whether or not the young person is aware of what is happening. The activity may involve physical contact, including penetration (such as rape, buggery or oral sex); or non-penetrative acts (such as masturbation, kissing, rubbing and touching outside of clothing); or non-contact activities (such as involving young people in looking at, or in the production of, pornographic material, watching sexual activities or encouraging young people to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse including via the internet).

Emotional/Psychological Abuse

Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects upon the young person's emotional development. It may involve conveying to young people that they are worthless or unloved, inadequate or undervalued. It may include not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on young people. These may include interactions that are beyond the young

person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person from participating in normal social interactions.

Moreover, it may involve seeing or hearing the ill treatment of another. It may involve serious bullying causing young people to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment of a young person, though it may occur alone.

Domestic Abuse

The cross-government definition of domestic violence and abuse is:
 Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on young people. In some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Institutional Abuse

Institutional abuse occurs when the lifestyles of young people are sacrificed in favour of the rituals, routines and/or restrictive practices of the home or care setting.

Institutional abuse is the repeated poor care of young people or a group of young people by those working in the care establishment. Young people living within an institution for example, a children's home, are potentially vulnerable to institutional abuse.

For more information see Appendix 10 of this Policy's Good Practice Guidance "Closed Cultures, Organisational and Institutional Abuse"

Self –neglect

This occurs when a young person constantly fails to respond to their own needs and which has a detrimental effect on their health and well-being. It can also occur where the inability of a person to understand the consequences of his or her actions or inaction and where this inability leads to or may lead to harm.

Financial Abuse

Financial abuse occurs when an individual's resources are being inappropriately used to the advantage of another person.

This policy also recognises the following areas as abuse:
- Child Sexual Exploitation (CSE)
- Female Genital Mutilation, (FGM)
- County Lines (Criminal exploitation)
- Forced Marriage and Honour Based Violence
- Peer on Peer Abuse
- Sexting
- Online Abuse
- Radicalisation

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection or status. The manipulation or 'grooming' process involves befriending young people, gaining their trust, and often providing them with drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no young person can ever consent to being abused or exploited. (Barnardo's,2012).

Female Genital Mutilation

Female Genital Mutilation (FGM) is a form of child abuse and as such is dealt with under MacIntyre's Safeguarding Policy. The World Health Organisation definition is: 'Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.' (World Health Organisation, 2014).

FGM is recognised internationally as a violation of the human rights of girls and women. It reflects deep-rooted inequality between the sexes, and constitutes an extreme form of discrimination against women. It is nearly always carried out on minors and is a violation of the rights of children. The practice also violates a person's rights to health, security and physical integrity, the right to be free from torture and cruel, inhuman or degrading treatment, and the right to life when the procedure results in death".

Whilst all staff should speak to the Designated Safeguarding Lead, or a member of the Designated Safeguarding Team, with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers and staff. If a teacher or staff member, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

County Lines

County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves child criminal exploitation (CCE) as gangs use young people and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations.

County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities. More information on this is available in Appendix 6 of this Policy's Good Practice Guidance.

Forced marriage and Honour Based Violence

Forced Marriage: Forced marriage is when a person faces physical pressure to marry (for example, threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. they are made to feel like that they are bringing shame on their family) if they do not marry.

An arranged marriage is very different from a forced marriage. An arranged marriage is entered into freely by both people, although their families take a leading role in the choice of partner.

Honour Based Violence: So-called honour based violence is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community. Honour'-based violence is in evidence across countries, cultures and religions.

Circumstances which may lead to the abuse are wide ranging and not culturally specific. Honour based violence affects people of all ages, but often begins early, in the family home. This can lead to a deeply embedded form of coercive control, built on expectations about behaviour that are made clear at a young age. Often the control is established without obvious violence against the victim, for instance through family members threatening to kill themselves because of the victim's behaviour.

Peer on Peer Abuse

Young people can abuse other young people. This is generally referred to as peer on peer abuse and can take many forms. Peer abuse is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others.

All staff should recognise that young people are capable of abusing their peers. All staff should be aware of safeguarding issues from peer abuse including:
- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals.

Sexual violence and sexual harassment can occur between two young people of any age and sex. It can also occur through a group of young people sexually assaulting or sexually harassing a single child/young person or group of children/young people. Young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

This abuse can:
- Be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences
- Result in significant, long lasting and traumatic isolation, intimidation or violence to the victim; vulnerable young people are at particular risk of harm

Young people who harm others may have additional or complex needs e.g.:
- Significant disruption in their own lives
- Exposure to domestic abuse or witnessing or suffering abuse
- Educational under-achievement
- Involved in crime

Stopping violence and ensuring immediate physical safety is the first priority of any education or care setting, but emotional bullying can sometimes be more damaging than physical.

Staff, alongside their Designated Safeguarding Lead and/or Deputy or Manager, have to make their own judgements about each specific case and should use this policy guidance to help.

The initial response to a report from a child or young person is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If a child or young person discloses information to you or you have any concerns in relation to the above you **MUST** report this immediately.

Sexting

Young people who share sexual imagery of themselves or their peers are breaking the law. However, as identified in national guidance, it is important to avoid criminalising young people unnecessarily.

All incidents or concerns must be reported to your line manager or another manager, the DSL or any other member of the Designated Safeguarding Team or directly to the local authority safeguarding team as with all other safeguarding issues and concerns.

If staff become concerned about a 'sexting' issue in relation to a device in the possession of a student (e.g. mobile phone, tablet, digital camera), the member of staff will secure the device (i.e. it should be confiscated) if safe to do so. This is consistent with DfE advice: 'Searching, Screening and Confiscation - Advice for head teachers, school staff and governing bodies' (DfE January 2018). Staff will not look at or print any indecent images. The confiscated device will be passed immediately to the DSL (see 'Viewing the imagery' below).

The DSL, or any other member of the Designated Safeguarding Team, will discuss the concerns with appropriate staff and speak to the young people involved as appropriate. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the Police immediately.

The Police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years of age.

Viewing the imagery - Adults (DSL) should not view child or youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible the response of the DSL, or any other member of the Designated Safeguarding Team, to incidents will be based on what they have been told about the content of the imagery. Any decision by the DSL, or any other member of the Designated Safeguarding Team, to view imagery, will be based on their professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil.

Photography and images - The vast majority of people who take or view photographs or videos of young people do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse young people through taking or using images, so we must ensure that we have some safeguards in place. To protect learners we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- Seek parental consent in addition to this
- We will not use the learner's name with an image
- Ensure learners are appropriately dressed
- Encourage learners to tell us if they are worried about any photographs that are or have been taken of them.

All staff should be aware that 'upskirting' is now a criminal offence. Upskirting is, "taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm"

Online Abuse

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.

Young people can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading young people to take part in sexual activity online).

Young people can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people. This can be very distressing for young people.

Radicalisation

Young people are vulnerable to extremist ideology and radicalisation. Similar to protecting young people from other forms of harms and abuse, protecting young people from this risk is a part of MacIntyre's safeguarding approach. For further detail see Appendix 5 of this Policy's Good Practice Guidance on 'Hate Crime, Mate Crime, Radicalisation and the government's Prevent strategy'.

See also:

Appendix 9 of this Policy's Good Practice Guidance on 'Child trafficking and Modern Slavery'

6   Duty to Report

However difficult it may seem, **all staff have a duty to make known their suspicions of abuse or neglect**. Failure to do so is a failure in their duty of care. Failure by staff to report can be interpreted by the person at risk as approval of, or condoning the abuse. Remember, an individual may not be able to alert anyone themselves, perhaps through failure to understand that the activity is abusive, or through staff not understanding their individual method of communication or through fear.

Managers must ensure that staff are appropriately supported when raising concerns (see Whistleblowing Policy).

7   Schedule of Responsibilities

7.1   Trustees
- To ratify policy
- To receive feedback from the CEO on matters relating to safeguarding and protection from abuse
- To report serious incidents to the Charity Commission in line with the Commission's guidance

7.2   Chief Executive Officer
- To hold lead responsibility for safeguarding arrangements throughout MacIntyre
- To feedback to Trustees on matters relating to safeguarding and protection from abuse
- To ensure appropriate corporate reporting
- To ensure revision of the policy in line with lessons learned and best practice

7.3   Directors
- To create and deliver the policy
- To authorise variations in policy in local circumstances.
- To oversee the evaluation of the policy
- The Director of Education, Young people acts as MacIntyre's Prevent Lead

7.4   Heads of Operations
- To take active steps to promote good practice under this policy
- To monitor and review the management and implementation of this policy and practice in the services for which they are responsible
- To ensure that key training needs are identified and addressed
- To direct and oversee the work of the Investigating Manager in an investigation
- To ensure that appropriate support is offered to any staff involved in a safeguarding investigation
- To track and record all investigations
- To authorise and monitor any actions resulting from an investigation
- To decide upon what information should be shared with individuals and agencies

during the course of and following an investigation into abuse

- To deploy staff in a way that deters collusive relationships and closed cultures, and that opens up opportunities for disclosure

7.5 Head of Compliance and Safeguarding

- To act as corporate Champion, liaising with operational and HR colleagues to ensure that the young people we support who are involved in safeguarding concerns are empowered and listened to
- To lead on MacIntyre's approach to Safeguarding by co-ordinating the Safeguarding Group, being the main point of contact internally and externally
- To act as MacIntyre's PiPoT Lead
- To monitor the reporting of safeguarding concerns across the organisation, and provide statistical analysis of concerns logged, highlighting any trends or areas of concern
- To be responsible for issuing and updating the associated Good Practice Guidance

7.6 Managers

- In education provisions, the Programme Manager acts as the designated safeguarding lead for the No Limits provision; the role is described in the associated Good Practice Guidance; full details of the role are in Keeping Children Safe in Education
- To implement this policy and procedure within their area
- To report immediately any allegation or suspicion of abuse to the local authority
- To notify the appropriate regulatory body (if registered manager)
- The initial assessment of any allegation or suspicion of abuse
- The reporting of any allegation or suspicion of abuse to the Head of Operations, Police where appropriate, Social Services and, where agreed, family or 'significant other'
- To know and follow the Local Authority's policy procedures for reporting and investigating allegations or suspicions of abuse for each service within their responsibility, including PiPoT protocols
- To assess the 'safety' of services by observing and listening to individuals and looking for positive and negative indicators of performance as part of their observations of practice
- To monitor the delivery of safeguarding training within their area
- To adopt guidelines and procedures as noted in the associated investigations guidance
- To undertake an internal investigation into an allegation of abuse, if requested to do so by a Head of Operations
- To identify appropriate support for any staff involved in a safeguarding investigation
- To ensure they, and/or an allocated appointing officer, have completed a recognised safer recruitment course and to be responsible for ensuring that all recruitment meets the requirements of the 'Keeping children safe in education' guidance
- To deploy staff in a way that deters collusive relationships and closed cultures, and that opens up opportunities for disclosure

7.7 Front Line Manager/Programme Coordinator

- To implement the Policy and Good Practice Guidance within their service
- To set standards and practice within the service which promote a 'safe service' from abuse
- To immediately notify a Manager or Head of Operations of any allegation or suspicion of abuse (or, where this is not possible, to notify the local authority directly)
- To be aware of and follow the Local Authority policy and procedures for reporting and investigating an allegation or suspicion of abuse, and to ensure that all staff have access to the local authority contact details for reporting suspected abuse, including PiPoT protocols
- Where appropriate to provide support (or ensure support is provided) to staff who are witnesses to safeguarding concerns, and to brief them on what to expect
- To ensure that all their staff have completed the required safeguarding training, and to review staff competency with regard to safeguarding

7.8 All Employees

- To personally uphold MacIntyre's Statement of Values
- To be personally responsible for the quality of their work, and to work in a facilitative way that promotes great interactions
- To be aware of safeguarding as an issue and to inform their or another manager, or the local authority, of any concerns, suspicions or allegations of abuse
- To be aware of what constitutes a concern about a person in a position of trust (PiPoT) and to know how to act in relation to such a concern
- To be alert to the potential need for early help for a child
- To know what to do if a child tells them he/she is being abused or neglected
- To **NOT** act as an 'appropriate adult' with the police for a person we support without the prior agreement of the Head of Compliance and Safeguarding or Director
- To maintain an individual's safety and well being at all times, securing their immediate safety where possible
- To ensure their duty to inform overrides any desire to keep a confidence or to maintain solidarity with colleagues
- To make clear and detailed written records when abuse is disclosed, witnessed or alleged
- To understand the role of the designated safeguarding lead in education settings and to know the identity and contact details of the lead
- To never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child

8 Good Practice Guidance

MacIntyre will from time to time issue Good Practice Guidance on the implementation of this Policy.