



sister system

Safeguarding and promoting
the welfare of children:
Policy and Procedures

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Introduction

The Sister System has always placed and continues to place the highest priority on safeguarding and promoting the welfare of children and young people.

The policy and procedures have previously been reviewed and revised in the light of learning from serious case reviews and the subsequent policy developments that have taken place. The policy takes into account the statutory guidance contained in 'Working Together to Safeguard Children' 2015 DfE, the revised London Child Protection Procedures 5th edition 2013 and 'Keeping Children Safe in Education' 2016 DfE

This document follows guidance on what organisations providing services to children or working with children need to have in place.

It also includes a policy statement, roles and responsibilities, guidance for Sister System Key workers, managers and supervisors. It also outlines arrangements for training, monitoring and information sharing.

This policy has been approved by the trustees in December 2020.

Signed: Mark Williams

Date: 19th December 2020

- The policy will be reviewed every two years
- Next review date December 2022
- The Lead for safeguarding at Sister System isOkela Douglas..... All safeguarding concerns should in the first instance be reported to the Lead for Safeguarding...Directors@sistersystem.org...and in their absence, the Deputy Lead for Safeguarding,..Tanya Nelson...programmes@sistersystem.org
- Contact details are in Appendix 3

Section 1: The Policy

The Sister System places the highest priority on safeguarding and promoting the welfare of children and young people. The aim of the policy is to outline Sister System commitment to and awareness of the need to safeguard and promote the welfare of children.

'No single professional can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action'' Working Together to Safeguard Children, 2015

1.0 The Policy

1.1 Principles

Children and young people have a fundamental right to be protected from harm and abuse. Children, young people and their parents/carers have a right to expect educational settings to provide a safe and secure environment.

Sister System believes that a child has the right to be:

- Protected from neglect, abuse and exploitation and to be safe
- To have the opportunity to achieve their full potential
- To have their needs determined and met
- To be listened to, believe and have their views be given careful consideration
- To be respected and understood in the context of their own cultural, religious and ethnic origin.

1.2 Legal Framework

The policy is written in the wider context of the Children Act 1989 and 2004, the provisions of section 175/157 of the Education Act 2002 and Working within the Sexual Offences Act 2003. It also takes account of the Working Together Guidance 2015. It places specific child protection procedures in the context of the wider safeguarding agenda.

1.3 Accountability and responsibilities

This policy applies to all key workers, coaches, volunteers, consultants, supervisors, managers, project leads and trustees, recognising that all levels of the organisation should take responsibility for safeguarding children and that there should be clear accountability within the organisation.

On a day-to-day basis key workers have a key role to play because of the frequent and regular contact they have with children and young people. Accountability for safeguarding girls and young women and child protection does not lie solely with frontline staff and ultimately senior managers and trustees take responsibility for ensuring the safety of girls and young women.

Sister System is committed to ensuring that all staff have access to appropriate supervision and training. Sister System will ensure allegations against staff, professionally and personally, are taken seriously and investigated in the most appropriate way.

1.4 Definitions

1.41 Safeguarding

The emphasis of current policy is to take a holistic approach recognizing that protecting girls and young women from harm cannot be separated from policies to improve children's lives as a whole.

Safeguarding is taken to mean:

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

1.42 Safeguarding and Sister System

All Sister System work relates to safeguarding girls and young women in this holistic way. Our work is wide ranging and many key workers and volunteers are involved in a whole variety of work which includes work on anti-bullying, social and emotional wellbeing and health education.

As well as those issues defined below, Sister System recognizes that effective inter-agency work is key to safeguarding girls and young women;

'The support and protection of children cannot be achieved by a single agency every service has a part to play. All staff must have placed on them the clear expectation that their primary responsibility is to the child and his or her family.'

Lord Laming in the Victoria Climbié Inquiry Para 17.92 and 17-93

New local multi-agency safeguarding arrangements will be in place from September 2019;

Local Safeguarding Children's Boards (LSCB) and Serious Case Reviews are due to be replaced by a new system involving three key safeguarding partners; the Local Authority, the clinical commissioning group and the chief officer of police. This may vary from area to area and schools and colleges should continue to work with the LSCB until advised otherwise. (KCSIE2019).

1.43 Welfare: Welfare is defined in the Children Act 1989 in terms of children's health and development, where health means physical and / or mental health. Development means physical, intellectual, emotional, social, or behavioural development.

A holistic approach to safeguarding also encompasses:

- physical and mental health and emotional wellbeing
- protection from harm and neglect
- education, training, and recreation
- making a positive contribution to society
- social and economic wellbeing

Practitioners need to be aware of the increased vulnerability of some groups of children, and these can include:

- disability: both physical and mental
- specific additional needs and / or special educational needs (whether or not they have a statutory education, health and care plan)
- young carers
- missing/going missing from care or home
- misusing drugs or alcohol
- returning home to their family from care

1.43 Early Help:

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Early help is defined as the provision of support to a child / family as soon as the problem emerges and providing early help can be more effective in promoting the welfare of children than reacting later.

According to Working Together to Safeguard Children 2018, effective early help relies upon local organisations and agencies working together to:

- identify children and families who would benefit from early help
- undertake an assessment of the need for early help
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activities to improve the outcomes for the child (ren)
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All individuals should be alert to the potential need for early help for a child (ren) who:

- is disabled and has specific additional needs
- has special educational needs
- is a young carer
- is showing signs of being drawn into serious violent crime, anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing / going missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child

1.43 Welfare

Welfare is defined in the Children Act 1989 in terms of children's health and development, where health means physical and/or mental health. Development means physical, intellectual, emotional, social or behavioural development.

This holistic approach to safeguarding also encompasses

- Physical and mental health and emotional well being
- Protection from harm and neglect
- Education training and recreation
- Making a positive contribution to society
- Social and economic well being

Key Workers need to be aware of the increased vulnerability of some groups of children and these can include:

- Disability both physical and mental.
- Racism, oppression and discrimination
- Faith issues

1.44 A Child In Need

This is defined in the Children Act 1989 s17 as those children whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development or their health and development will be significantly impaired without the provision of services in addition this includes disabled children.

1.45 What is significant harm?

This definition was introduced in the Children Act 1989 as a threshold that justifies compulsory intervention in family life in the best interests of children. Some children are in need because they are suffering or likely to suffer significant harm. Decisions about significant harm are complex and involve careful assessment by those involved with working with children. It is the responsibility of Children's Social Care to make the final decision as to whether this threshold has been crossed, but all services have an important role to play in contributing to assessments.

1.46 Child abuse

Child abuse is a general term used about situations where the child may experience ill treatment or impairment of development. This can occur in a number of different settings including the home. It can include both actions and omissions on the part of parents and carers, but other close family members or friends may be involved. Child abuse is normally defined under the following headings:

- Physical abuse
- Neglect
- Sexual abuse
- Emotional abuse

It is important to recognise that abuse is a multi-faceted concept and many children who have been abused will have experienced more than one form of abuse. Children can be put at risk of harm by a variety of behaviours. This list is not exhaustive but can include domestic violence, drug and alcohol abuse, parental mental ill health, as well as practices which have a direct impact on children and young people like female genital mutilation, and forced marriages.

1.47 Child Protection

This term is used to describe the responsibilities and activities undertaken to prevent or stop children being abused or ill-treated.

1.5 Adults working with children

1.51 People who abuse children

The Sister System recognises that whilst those who abuse children may be relatives or friends of the family, some meet children in other contexts and some of these may gain access to children in schools as teachers or support staff or through their voluntary involvement in school activities. We will work to ensure a culture that supports staff, girls and young women to feel confident about reporting concerns.

1.52 Abuse of Trust

Sister System recognizes the need for staff to maintain appropriate boundaries in all of their work with girls and young women and their families.

Key workers, and other members of Sister System staff who come into contact with service-users, are expected to uphold a very high standard of professional boundaries in all of their work, and a high level of transparency with regard to any issues that may be of concern re upholding boundaries. Wherever staff

may have contact with known service-users outside of their work role, they should discuss the situation with their manager, in order to agree appropriate steps around protecting themselves and Sister Systems' work with the girl or young woman. This includes all professional relationships involving service-users, situations or incidents that may be interpreted as compromising or unprofessional.

The Sexual Offences Act 2003 states that, subject to a number of limited definitions, it would be a criminal offence for a person in a position of trust to engage in any sexual activity with a person aged under 18 with whom they have a relationship of trust, irrespective of the age of consent even if the basis for their relationship is consensual. A relationship of trust exists where a member of staff or volunteer is in a position of power or influence over a service-user by virtue of the work or nature of the activity being undertaken.

Intimate or sexual relationships between staff and service-users will be regarded as a grave breach of trust and will be dealt with through Sister System disciplinary procedures.

1.53 Allegations against staff

These procedures should be used in respect of all cases where it is alleged that a person who works with service users has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children in connection with the person's employment or voluntary activity.

If the concern is not connected to the person's employment or work activity, these procedures may also apply:

- Where concerns arise about the person's behaviour towards a child or young person the concern should be raised with the Safeguarding Lead or Deputy.

Summary of the process

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

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

- a police investigation of a possible criminal offence;
- enquiries and assessment by CSC about whether a child is in need of protection or in need of services; and
- investigation by Sister System consideration in respect of the individual.

A) Initial Considerations:

The LADO should always be consulted on all allegations that appear to meet the criteria, within 1 working day, to determine if a police investigation and / or CSC enquiries are appropriate and whether immediate intervention is required. In less serious cases, police and CSC may not need to be involved but the LADO can provide an objective view by someone who is independent of the organisation. In some, more complex cases, or where it is unclear how the case should be taken forward, the LADO may call a consultation meeting with the employer, and occasionally, other professionals, to review the information and decide how best to proceed.

B) Initial Action:

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

The consultation with the LADO should take place before any investigations commence to establish whether:

- i) the allegation falls within the scope of the procedures, including physical contact;

ii) the Manager needs to gather further information.

Any allegation or concern which arises should be reported immediately to the Manager identified and the Safeguarding Lead/Deputy. Where staff receive an allegation against someone from another organisation, this should be reported directly to the Safeguarding Lead/Deputy and relevant LADO.

The LADO will consult, as appropriate, with a Children's Social Care Manager and/or the Police Designated Officer to consider:

The Manager, in consultation with the Safeguarding Lead/Deputy must consider carefully whether the circumstances of the case warrant the person being suspended from contact with girls and young women in the workplace until the allegation is resolved. Suspension should not be the default position; an individual should only be suspended if there is no reasonable alternative, and where suspension is used it is a neutral act.

The Manager should inform the person subject to the allegation about the allegation as soon as possible after consulting the Safeguarding Lead/Deputy and the LADO. Where a strategy discussion is required, or police and / or CSC may need to be involved, the Manager must wait until the LADO has agreed with the agencies what information can be disclosed to the person subject to the allegation and by whom. The Manager will need to consider advising parents/carers of an incident involving their daughter this might be straight away, for example, if the child has

been injured whilst in the organisation's care and requires medical treatment, or this may need to wait until initial consultation has taken place with the agencies involved, to determine what can be disclosed and by whom.

C) No further action:

Where the LADO agrees that no further action is to be taken regarding the individual facing the allegation, the decision and justification should be recorded by both the Manager and the LADO and agreement reached as to what information should be put in writing to the individual concerned and by whom. The Manager should then consider with the LADO any action in respect of those who made the initial allegations and consider what information should be shared with the girls and their parents / carers and by whom.

Where the allegation does not require a formal process, appropriate action should be initiated within three working days.

D) Disciplinary / internal investigation:

The outcome of any process must be reported to the Safeguarding Lead/Deputy and the LADO, who should consider with the Manager what information should be shared with the girls and their parents / carers and by whom.

E) Action on Conclusion of a Case:

Where investigations are concluded, the Manager with the Safeguarding Lead/Deputy should convene a review discussion/meeting to share relevant information, categorise the allegation if there is sufficient information and agree any further action to be taken.

Where an internal/disciplinary process is concluded, the LADO should be informed of the outcome and should reach agreement with relevant professionals as to the category of the allegation.

Allegation Categories

- Substantiated: there is sufficient identifiable evidence to prove the allegation;
- False: there is sufficient evidence to disprove the allegation;
- Malicious: there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false;
- Unfounded: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the allegation or was mistaken about what they saw. Alternatively they may not have been aware of the circumstances;

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- Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

For all allegations a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken and decisions reached should be kept on the confidential personnel file of the individual concerned and a copy of this should be provided to the individual.

If the allegation is substantiated and the person is dismissed, or the person resigns, the Safeguarding Lead/Deputy should discuss with the Manager and admin officer whether a referral to the Disclosure and Barring Service (DBS) for consideration of inclusion on the barred lists, and / or to a Professional Regulatory Body is required.

Action In Respect of Unfounded or Malicious Allegations

For those cases where it is immediately clear that the allegation is unfounded or malicious then it is expected that they should be resolved within one week.

If an allegation is determined to be unfounded or malicious, the LADO should discuss the matter with CSC to determine whether the girl or young woman concerned is in need of services, or may have been abused by someone else.

Learning Lessons

At the conclusion of a case the Safeguarding Lead/Deputy should consider whether there are any improvements to be made or lessons to be learned. This should include, where appropriate, consideration of Sister Systems procedures or practice to help prevent similar events in the future, including issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

1.6 Safer Recruitment

All recruiting managers adhere to Safer Recruitment practices and are trained in this process. This includes obtaining all the appropriate pre-employment checks as outlined in 'Keeping Children Safe in Education' 2016 and Safeguarding Children and Safer Recruitment 2006. This includes an enhanced Disclosure and Barring Service (DBS) checks with a barred list for all staff, prohibition checks and disqualification by association checks where necessary.

All information will be kept on a single central record as outlined in 'Keeping Children Safe in Education' 2016 in a secure, suitable electronic format.

Section 2: Roles and responsibilities

2.0 Roles and Responsibilities

2.1 Lead trustee will:

- have a monitoring role and responsibility to ensure the organisation is following good practice and that policies are up to date
- work with the designated Sister System safeguarding lead on a yearly report to trustees

2.2 Designated Sister system safeguarding lead will:

- ensure information is gathered about training
- monitor training and induction and ensure that all staff receive child protection training every two years
- be responsible for investigating allegations against staff
- work with lead trustee to produce a yearly safeguarding report

- support and advise managers
- monitor child protection work in order to evaluate outcomes for children
- ensure training is up to date and regular for managers

2.3 Sister System managers will:

- know the name of the key people in the local authority/borough where they work (i.e. the local authority designated officer (LADO) for allegations against staff and the education child protection/safeguarding lead)
- offer advice to Key workers during supervision, especially on risk assessment, good record keeping and safeguarding referrals
- support Key workers involved in cases of safeguarding during supervision
- ensure that Key workers keep within the boundaries of their role
- verify at supervision meetings with Key Workers that there have been no safeguarding referrals since the last meeting that Sister System are unaware of
- ensure follow up of any safeguarding referral, and that the records of that follow up are kept, along with alternative actions if necessary.
- ensure training compliance with the support of Sister Systems internal CPD.
- ensure the Sister System is fulfilling their responsibilities and highlight issues in the partnership agreement discussions
- liaise with the referer, in particular with the lead professional for child protection if there are issues of concern and keep Sister System safeguarding lead informed
- keep up to date with current legislation, policy, guidance and practice
- Liaise with Sister System Operational Safeguarding are all safeguarding referrals, and seek guidance immediately where current arrangements may leave girls and young women at risk.

2.4 Sister System Key worker will:

- be compliant with Sister System child protection policies and procedures and adhere to them at all times
- know who the school's designated safeguarding lead and deputy designated safeguarding lead
- report any safeguarding concerns immediately to the school's designated safeguarding lead, and their Sister System line manager, and record advice given and action taken, as outlined in Appendix 1: Sister System Safeguarding Process
- discuss all safeguarding concerns with the designated safeguarding lead/deputy
- keep detailed, accurate and clear records on case file using the template provided
- be involved in the initial assessment procedure by providing information about the girl, young woman and their family
- provide where necessary written additional information for meetings in connection with child protection in cooperation with the designated safeguarding lead
- check with the Sister System manager if asked to do anything unusual or out of the ordinary or which comprises or may compromise professional boundaries
- attend safeguarding training provided by local authority in support with Sister System CPD.

The role of school-based/external setting referrals in relation to supporting school/external settings safeguarding arrangements may vary significantly, depending on the needs of the girl. Where schools/external settings expect Sister System key workers to play a significant role in supporting school/external setting safeguarding arrangements, the school/external setting DSL must be closely involved, including providing information, support and guidance as necessary and with an agreed regular channel of communication for feeding back as necessary. These arrangements must be agreed in detail

with the Sister system manager and the Key worker and be given access to all MAP meetings/named on the girls care plan.

Sister System will attend a range of formal meetings, depending on their experience, training and support available. This may include Early Help Assessment/CAFS; CIN Reviews; initial strategy meetings; and Child Protection conferences. The Sister System will not represent the school/external setting in formal meetings, and do not have the authority to make decisions on behalf of the school.

Where Sister Systems are involved in Child Protection Conferences, they do not assume or be given the role of Lead. This is particularly required in the initial Child Protection Conference. Sister System Key workers should only attend subsequent CPCs without a school/external setting or Social Care representative where they are sufficiently experienced, and where these arrangements have been agreed with the Key worker and their manager beforehand. In all such cases, the Key worker should be fully briefed by the school prior to the meeting, and where the practitioner may play a role in communicating the school's views, this must be clearly agreed with the school/Social Care beforehand in writing.

The Sister System' key function in formal meetings is to give relevant information about their work with the girl, in order to support effective assessment of needs and the formulation of relevant plans. Key Workers may also play a useful role in engaging parents in the formal process. Key workers should guard against the risk of collusion with parents, and should remain child-focused.

Following a Child Protection Conference, Sister System Key workers can be members of the core group, on the following conditions:

- if the school Designated Safeguarding Lead or an appropriate representative from the school has agreed the Action Plan
- if the Key worker has already been working with the child in depth

The Sister System Key workers role in the core group should be to support implementation of the agreed action plan. This may include supporting the girl or young woman in meeting agreed expectations.

Variations to the standard Sister System Key worker role must take into account the confidence and expertise of the Key worker, and must ensure that suitable training, advice and support is available as needed, with the involvement of both the school and Sister System. While Key workers may legitimately play a useful operational role in supporting the school's safeguarding arrangements, Sister System Key workers are not responsible for these arrangements, and Sister System practice must not bypass the school's accountability for the safety of their pupils.

2.5 All Settings that Sister System works with must have policies and procedures which reflect the roles of staff and parents regarding:

- Behaviour and Anti-bullying
- Child Protection
- Single Central Record
- Health and Safety Procedures (which may include first aid, administering medicine)
- Premises Management
- Risk Assessments
- SEN
- Relationships and Sex Education
- Attendance
- Equality
- E-Safety
- Whistleblowing
- Professionalism and Staff Code of Conduct
- Dealing with allegations against staff
- Complaints policy

- Radicalization and Extremism (Prevent).
- Visitors to School (including volunteers, supply staff and visitors under SLA's)
- Staff Handbook
- Safer Working Practices

Sister System staff will adhere to the policies of the Setting in which they are working and understand them.

All schools/external settings must have a designated and deputy designated member of staff with responsibility for child protection. These staff will be members of the senior leadership team.

The guidance from DCFS ('Safeguarding Children and Safer Recruitment in Education 2007 awaiting revision) states clearly that the designated member of staff need not be a teacher but must have the status and the authority within the school management structure to carry out the duties of the post including committing resources and where appropriate directing other staff. A deputy should also be appointed to act in the designated person's absence and in large schools/external settings it may be necessary to have a number of deputies who are trained to deal with child protection issues

Settings Designated Safeguarding Lead responsibilities:

- Keep all staff updated with current child protection procedures
- Ensure that all staff receive child protection training
- Undertake training at two yearly intervals
- Provide advice and support to school staff
- Refer any concerns as soon as they arise to Children's Social Care
- Monitor attendance and development of children on the Integrated Children's systems & Child Protection Plan and inform Children's Social Care of proposed or actual change of school
- Ensure that all relevant information about a child is disseminated to appropriate staff within the Sister System
- Maintain accurate and secure child protection records
- If an allegation is made against a Sister System Keyworker the school must inform Sister System as the employer immediately. Agreement will then be made to inform the local authority. Sister System procedures will be followed as far as suspension is concerned.

The above responsibilities will be discussed fully during the negotiations for new business and the signing of the partnership agreement. Any variation in the above responsibilities must be discussed with the Sister System line manager.

2.6 Use of Reasonable Force/Restraint

The Department for Education document "Use of Reasonable Force in Schools" (DfE, 2014) provides non-statutory advice for schools/educational settings on the use of restraint or reasonable force to protect children's safety. The Sister Systems document "Guidelines re Use of Reasonable Force for key workers" outlines the implications of DE advice for Sister System Key workers and outlines expectations in relation to restraint and reasonable force. Guidelines around reasonable force may vary for Keyworker.

Section 3: Guidelines and procedures for Sister system staff

3.0 Guidelines and procedures (please see appendix 1)

3.1 There are a variety of ways concerns may come to your attention, these can include:

- If a girl says she is being abused
- If someone reports that a girl has told them they are being abused
- If someone strongly suspects that a girl has been or is being abused
- If there are concerns about or allegations against a member of staff (including a designated child protection person), volunteer or trustee
- If there are concerns about a girls welfare where there is no specific disclosure or allegation of abuse
- If someone has seen one girl abusing another or if one girl reports that this has happened to her

What to do if you have a concern about a girl /young woman?

- Always record your concerns in writing using the relevant paperwork, using the Sister System Safeguarding or cause for Concern process . Make notes as quickly as you can after concerns have arisen, providing a complete record of key information and evidence for risk. This record may be used as evidence at a later date. It is preferable that notes are completed and saved securely on a computer.
- You should keep a copy and also give a copy to the designated SGL and to your Sister system manager. Any copies of notes should be stored in line with Data Protection legislation. Records of all interventions, actions and referrals should be saved within the relevant case file.
- Always share safeguarding concerns – however insignificant - in writing using relevant forms
- All action needs to be taken by the DSL/Deputy even if it's not a referral to Children's Social Care (e.g. to another agency for support or continuing work from the Sister system)
- Contact your Sister System DSL/Deputy ASAP to let them know of the situation and forward them your completed record of concerns and actions agreed, as outlined in Appendix 1.

3.2 What to do if a girl /young Woman discloses to you?

A disclosure is the term used when a child/young person tells about an abusive situation.

Your role is to listen, but to be clear with children/young people that you cannot keep the information to yourself. It is important when you begin any work with a child/young person that you establish boundaries around confidentiality and explain clearly what information you will have to share and who you will share it with. This clarification should be repeated at the point that young people indicate that they wish to make a disclosure.

If a child/young person discloses information about an abusive situation or says they want to tell you something which is a 'secret' or 'confidential':

1. Make it clear that if you think what they have told you means they could come to harm you will have to tell the relevant designated child protection person. Be absolutely clear that you cannot promise confidentiality.
2. The child/young person may ask more questions at this point. You should explain the Sister Systems procedures in an appropriate way
3. If the child continues with the disclosure you will need to document:
 - Date
 - Time
 - Place
 - Anyone else present
 - Accurate factual notes on what the child/young person said and use a body map where possible or relevant. If possible write down verbatim what the young person/child said, these notes may be used in court later.
 - Any questions you may have asked.
4. It is important to be as empathic and supportive of the child/young person as possible so that they feel comfortable to talk.

Do not:

- Ask leading questions (if you need to ask questions for clarification to ensure they are open questions)
- Offer opinions
- Offer solutions or give false reassurances
- PROMISE CONFIDENTIALITY

If a girl or a young woman discloses information without warning or indication of the nature of the information that they are going to give, you may not have a chance to remind them that you cannot keep it confidential. You must tell them as soon as possible. This may make them retract their statement. However you are still obliged to pass this information on to the DSL, Local Authority child protection lead (where relevant), and to your sister System line manager, in order to seek guidance and agree any necessary actions.

If after hearing the information about confidentiality the girl or young woman decides not to tell you, you must respect this. However it is important to:

- Reassure the girl /young woman that they can come back at any time to discuss the issue
- Monitor the situation
- Raise the issue with the designated child protection person.

For disclosures made in the school/external setting to a Sister System Key worker, when the girl/young woman has finished giving information, pass it onto the designated child protection person within the school/external setting and the Sister System DSL as soon as possible in writing. Where School/external setting DSL is not available, seek the advice of the Head Teacher. Where there is reason to believe the girl/young woman is at risk of immediate harm you must ensure a suitable member of staff in the school/external setting knows of this and takes action.

Try and ensure that the girl/young woman understands what is happening. Write up your notes as quickly as possible ensuring that they are factual and clear and give a copy to the Sister System designated child protection person and your manager. Notes relating to child protection should be

kept by the designated person with other school records relating to child protection. You should not discuss the disclosure with other staff unless requested to by the designated person.

What happens next?

Inform your Sister System manager that you have become involved in a safeguarding issue immediately and complete the Safeguarding Alert form and send to the secure designated email address safeguarding@sistersystem.org to ensure that Sister System maintains an overview and up to date record of the number and nature of cases that Sister System staff have involvement in.

For school based disclosure's Sister Systems DSL/Deputy will follow up with the school designated officer within 24 hours of the action taken in regards to your referral and report .

After a disclosure, if you are distressed or feel the need to talk to someone it would be appropriate to speak with Sister System DSL or your supervisor.

3.3 What to do if you have concerns about another adult in the school.

If Sister System staff have any concerns about another staff member or volunteer they should as a matter of urgency to discuss the issue with their Sister System manager, who may seek advice from the Sister System Safeguarding Lead. Where appropriate, Sister System will report the issue to the head teacher who has responsibility for managing any allegations against school staff. Where appropriate, Sister System may directly report the matter to the Local Authority Designated Officer. Ensure that you have factual and specific notes about the issue. The Sister System Key worker will be supported by their manager in any further proceedings which take place.

3.4 Emergency action

There may be circumstances that warrant a Sister System Key worker taking emergency action to safeguard a child.

If a practitioner believes that a girl or young woman is at immediate risk of significant harm and they are unable to contact their child protection lead in school/external setting ; their manager or the Sister System Safeguarding Lead or Deputy , emergency action must be taken to ensure that the girl is safe. This may mean:

- Contacting Children's Social Care (CSC)
- Contacting the CSC Emergency Duty Team
- Contacting the police if not possible to contact the above services.

Any such action must be recorded and the child protection lead for the school and Sister System manager must be informed as soon as possible and a Safeguarding Alert form completed and sent immediately.

Section 4: Guidance for Sister System practitioners working with sexually active young people under the age of 18

- 4.1 This guidance has been devised with the understanding that many young people under the age of 18 will have an interest in sex and sexual relationships and that this is part of healthy development.

It is designed to assist those working with children and young people to identify where these relationships may be abusive, and the children and young people may need the provision of protection or additional services.

It is based on the core principle that the welfare of the child or young person is paramount, and emphasizes the need for professionals to work together in accurately assessing the risk of significant harm when a child or young person is engaged in sexual activity.

This section is written in the context of the Sexual Offences Act 2003.

This legal framework has the aim to protect the rights and interests of young people and make it easier to prosecute people who pressure or force others into having sex when they do not want to.

There are two key principles:

1. The legal age for young people to consent to have sex is still 16 whatever their sexual identity.
2. The law is not intended to prosecute consensual teenage activity between two people of a similar age, unless it involves abuse and/or exploitation.

Under the Sexual Offences Act young people still have the right to confidential advice on contraception, condoms, pregnancy and abortion even if they are under 18 (see Fraser guidelines section 4.3).

- 4.2 Risk assessment

Not all sexual activity engaged in by under 16's is against the law, and even if it is the likelihood of prosecution is low unless there is an element of force, deception or abuse of power involved.

In order to determine whether the relationship presents a risk to the young person, the following factors should be considered. This list is not exhaustive and other factors may be needed to be taken into account:

- Whether the young person is competent to understand and consent to the sexual activity they are involved in
- The nature of the relationship between those involved, particularly if there are age or power imbalances as outlined above
- Whether overt aggression, coercion or bribery was involved including misuse of substances/alcohol as a disinhibitor
- Whether the young person's own behaviour, for example through misuse of substances, including alcohol, places them in a position where they are unable to make an informed choice about the activity
- Any attempts to secure secrecy by the sexual partner beyond what would be considered usual in a teenage relationship

- Whether the sexual partner is known by the agency as having other concerning relationships with similar young people
- If accompanied by an adult, does that relationship give any cause for concern?
- Whether the young person denies, minimises or accepts concerns
- Whether methods used to secure compliance and/or secrecy by the sexual partner are consistent with behaviours considered to be 'grooming' where the abuser may organise the environment.
- Whether sex has been used to gain favours (e.g. swap sex for money, cigarettes, clothes, CDs, trainers, alcohol, drugs etc).
- The young person has a lot of money or other valuable things which cannot be accounted for.

4.3 It is considered good practice for Key Worker to follow the Fraser/Gillick guidelines when discussing personal or sexual matters with a young person under 16. The Fraser guidelines give guidance on providing advice and treatment to young people less than 16 years of age. These hold that sexual health services can be offered without parental consent providing that;

- The young person understands the advice that is being given
- The young person cannot be persuaded to inform or seek support from their parents, and will not allow the worker to inform the parents that contraceptive/protection, e.g. condom advice, is being given
- The young person is likely to begin or continue to have sexual intercourse without contraception or protection by a barrier method
- The young person's physical or mental health is likely to suffer unless they receive contraceptive advice or treatment
- It is in the young person's best interest to receive contraceptive/safe sex advice and treatment without parental consent

4.4 Young People under the Age of 13

Under the Sexual Offences Act 2003, children under the age of 13 are considered of insufficient age to give consent to sexual activity. A child under the age of 13 who is having penetrative sex is a victim of statutory rape and a child protection referral must be made to Children's Social Care in the local authority where the child or children live immediately.

The police must be notified as soon as possible when a criminal offence has been committed or is suspected of having been committed against a child unless there are exceptional reasons not to do so (see recommendation 12 of Sir Michael Bichard report).

A referral would be made through existing Sister Systems child protection procedures, if one had not already been made.

When a girl under 13 is found to be pregnant, a referral must be made through existing Sister System procedures if a referral has not already been made.

4.5 Young People between 13 and 16

The Sexual Offences Act 2003 reinforces that, whilst mutually agreed, non-exploitative sexual activity between teenagers does take place and that often no harm comes from it, the age of consent should still remain at 16. This acknowledges that this group of young people may still be vulnerable, even when they do not view themselves as such.

Sexually active young people in this age group will still have to have their needs assessed using this protocol. A recorded discussion using Sister System wise choices risk assessment procedure should take place with supervisors, Sister System manager and DSL .

This difference in procedure reflects the position that, whilst sexual activity under 16 remains illegal, young people under the age of 13 are not capable to give consent to such sexual activity.

4.6 Young People between 17-18

Although sexual activity in itself is no longer an offence over the age of 16, young people under the age of 18 are still offered the protection of Child Protection Procedures under the Children Act 1989. Consideration still needs to be given to issues of sexual exploitation through prostitution and abuse of power in circumstances outlined above. Young people, of course, can still be subject to offences of rape and assault and the circumstances of an incident may need to be explored with a young person. Young people over the age of 16 and under the age of 18 are not deemed able to give consent if the sexual activity is with an adult in a position of trust or a family member as defined by the Sexual Offences Act 2003.

The Sexual Offences Act, recognising changes in family structures, has widened the definition of family. As well as blood relatives the act covers wider family members who are or have been living in the same household. This includes foster parents and foster siblings, step parents, cousins, step brothers and sisters.

4.8 Abuse of positions of trust

This applies to people who work with children in places like schools and the youth service, under these laws young people under the age of 18 are protected from abuse by those in positions of trust.

4.7 Sharing Information with Parents and Carers

Decisions to share information with parents and carers will be taken using professional judgement, consideration of Fraser guidelines and in consultation with the Child Protection Procedures. Decisions will be based on the child's age, maturity and ability to appreciate what is involved in terms of the implications and risks to themselves. This should be coupled with the parents' and carers' ability and commitment to protect the young person. Given the responsibility that parents have for the conduct and welfare of their children, professionals should encourage the young person, at all points, to share information with their parents and carers wherever safe to do so.

This protocol is written on the understanding that those working with this vulnerable group of young people will naturally want to do as much as they can to provide a safe, accessible and confidential service whilst remaining aware of their duty of care to safeguard them and promote their well-being.

4.8 The Sexual Offences Act 2003 does not affect the ability of health professionals and others working with young people to provide confidential advice or treatment on contraception, sexual and reproductive health to young people under 16.

The Act states that a person is not guilty of aiding, abetting or counselling a sexual offence against a child where they are acting for the purpose of:

- Protecting a child from pregnancy or sexually transmitted infection
- Protecting the physical safety of a child
- Promoting a child's emotional well-being by the giving of advice.

In all cases, the person must not be causing or encouraging the committing of an offence or a child's participation in it. Nor must the person be acting for the purpose of obtaining sexual gratification. This exception, in statute, covers not only health professionals, but anyone who acts to protect a child, for example teachers, Connexions Personal Advisers, youth practitioners, social care practitioners and parents.

Section 5: Guidance for Sister System managers

5.1 Managing Child Protection Cases

In the context of overall support of Key Workers, managers must gather regular updates on outstanding safeguarding cases, and double-check whether any new safeguarding concerns have emerged. Cases which have either a CP or CIN plan or are identified as being on the cusp of social care involvement (Early intervention) must be discussed at every supervision meeting.

What to do when a worker brings a concern to you

- Find out as much information as possible about the situation and ask the practitioner to forward you copy of events in writing.
- Who else is already involved – has the situation already been discussed with the local designated safeguarding lead?
- If more information is needed contact the local designated safeguarding lead.
- Inform Sister system Safeguarding Lead.
- Keep your own record of the situation and outcome of discussions.
- Monitor the situation regularly to check what action has been taken

5.2 Risk Assessments

Where Sister System staff have potential evidence of abuse, it is not generally our responsibility to carry out a risk assessment. Instead we must report our concerns to the school/external setting DSL and sister System DSL, or the relevant Local Authority Safeguarding lead. Should the DSL or deputy be unavailable then the Key Worker should contact their Sister System manager. In these unusual circumstances (which in theory should never happen), the Sister system manager should make a risk assessment based on information available, considering whether there is reason to believe the girls are at risk of immediate danger, or whether there is potential for abuse. Manager should agree action to be taken in conjunction with the Sister System safeguarding lead, and where there is an immediate risk of significant harm, Sister System will make an immediate referral to Children's Social Care.

Once a referral has been made to Children's Social Care the case becomes their statutory responsibility. Where Key Workers are concerned about the response of Children's Social Care

managers may follow up these concerns after discussion with local designated safeguarding lead and the relevant person in Children's Social Care. Managers should liaise with the Sister System Safeguarding Lead in these circumstances.

Recording

- Managers must keep a clear record of all communication with Key workers about safeguarding issues, to be saved centrally in the appropriate folder.
- Careful recording of these discussions is vital, including key information, evidence of risk, concerns, advice given, and next steps.
- Records of all supervision and line management given to practitioners must be available for scrutiny, as part of the Sister System quality assurance processes, or as specific needs arise in relation to particular cases.

5.4 School Child Protection Procedures

Where there may be concerns regarding child protection procedures in a school, managers should:

- Gather the facts from the Sister System Keyworker
- Make a clear note of the issues and check back with the Key worker that they are correct
- If then the Sister System manager does have any concerns they should discuss with the Sister System safeguarding lead.
- The manager should arrange to meet the school link manager and designated person to discuss the issues
- Check whether the school has a reasonable explanation of their decisions.
- Sister System line managers should monitor and record the situation concisely and clearly, including any and all follow up action.
- If the Sister System key worker or manager continues to have concerns and the school /external setting does not appear to be giving satisfactory answers to these concerns then aim to arrange a meeting with the head/line manager and the LA/borough Designated Officer to discuss Sister System concerns. Support is available for managers at <http://www.ofsted.gov.uk/Ofsted-home/About-us/Contact-us/Safeguarding-children-Ofsted-s-whistleblower-hotline>

Section 6: Training

6.0 Training

All staff regardless of their roles and lead trustees with responsibility for child protection will receive appropriate training. This includes:

- Safeguarding training
- Prevent
- Channel
- FGM
- CSE
- Identifying Abuse

All staff and trustees must also have read Part 1 'Keeping Children Safe in Education' 2016 and Annex A.

6.1 Key Worker will receive:

- A dedicated Safeguarding input delivered by Sister System within the context of initial induction training
- Refresher training every two years.
- More advanced training according to local circumstances and development of work remit, in discussion with their Sister System line manager
- Safer Recruitment Training.

Local Authority induction and refresher training should generally be a full 1 day session, at an appropriate level for their duties and experience. In general, this training should be aimed at Group 3 practitioners (members of the workforce who work primarily with children, young people and families), and themes/content should be matched as closely as possible to issues relevant to the Key Worker' client group.

6.2 Managers/Safeguarding Lead will receive:

- Safeguarding input in the context of induction training as outlined above.
- Local Authority Safeguarding refresher training every two years
- Other relevant training in discussion with Sister System line manager/Safeguarding Lead, and in conjunction with developmental needs of managerial team as a whole.
- Previous training and experience will be taken into account.

6.3 The lead trustee will:

- Be offered the opportunity to access senior manager training or must access the online training aimed at schools .

Section 7: Monitoring

7.0 Monitoring

- 7.1 Recording all relevant and factual information on the Case management system.
This is the primary record, which allows monitoring of safe practice. This information can be used in CP conferences and will be seen by all parties.
- 7.2 Report to manager
Managers should provide summary reports of safeguarding referrals to the Sister System Safeguarding Lead as required to facilitate internal reporting.
- 7.3 Report to trustees
Yearly report presented to the board by the lead trustee to include description of activity in that year, training report and any issues of concern in the implementation of the policy.
- 7.4 Training is monitored by the Sister System CPD log as agreed by the DSL .
Probation may only be confirmed if practitioners have completed or are booked onto borough/authority training, or alternative arrangements have been agreed.
Records must be kept of Managers and Key Workers attendance at yearly training.

Section 8: Information sharing

- 8.0 Information-sharing is an essential element of Sister System support for girls, young women and families, enabling us to promote early intervention, to improve outcomes, and to protect children. The need for good information-sharing among agencies must be balanced against the need for us to retain a trusted relationship with the girls we support. Where information-sharing among agencies is demonstrably necessary in order to protect the safety of a girl, this takes precedence over client confidentiality.
- 8.1 Sister System always aims to work in partnership with girls and young women, and to avoid breaches of trust. Key Workers must be open and honest with service-users about the limits of confidentiality that we can offer at the outset of their working relationship. The extent to which referring schools or Local Authorities require detailed updates on the progress of casework may vary according to the school or the project, and Key Workers should be open with service-users about these expectations. Key Workers should highlight that at a minimum, we must share information on a need-to-know basis with school or Local Authority, where girls may be at risk of harm. Key Worker should also be open with girls, young women and families about supervisory and case recording arrangements within the Sister System.
- 8.2 Key Workers should exercise their professional judgement in deciding whether to share information without consent, and should seek guidance from their Sister system manager whenever there may be a question about our duty. Sharing information without consent should always be a proportionate response, based on the need to safeguard girls and young women and families. Key Workers and managers should keep a clear record of the decision to share information, including managerial guidance, the reasons for this decision, and details of what information has been shared and with who.
- 8.3 To support good judgement in these matters, Key Workers and managers should refer to the government guidance Information Sharing: Guidance for Practitioners and Managers (DCSF 2008).

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf

Sister System Reporting Process

Immediate Actions

Where Sister System Key Workers may have evidence of child abuse (for instance through a disclosure by a girl, observation of potentially abusive behaviour, or information-sharing by colleagues), Key worker must take the following actions on the same day:

- Raise concerns with local Safeguarding lead as appropriate key worker report to Designated Sister System Safeguarding Lead
- Update the Case management record on the personal details page with the level and reason for concern. It must be noted in the case record the background for the escalation of an existing case and what actions have been taken. If it is a new case any relevant background information must also be recorded in the case record.

Internal Sister System Reporting

Sister System has an internal Safeguarding Reporting System, enabling us to retain an overview of the number of safeguarding and early intervention cases we are working with. This internal reporting is required whenever Sister System Keyworker are involved in the following cases:

- Cases formally reported to the School Designated Safeguarding Lead
- Cases where a Safeguarding referral is made to the Local Authority
- Cases where children are subject to a Child Protection or Child in Need Plan
- Cases where the Key worker believes the case could escalate to Safeguarding
- Cases where Keyworker/manager are unsatisfied with assessments made by school or Local Authority, and evidence suggests current arrangements leave children at risk.

Please note that the internal Child Protection Reporting system is purely a means of reporting Sister System involvement in child protection cases, and should not be seen as a replacement for managerial oversight. Key Workers should seek guidance from their Manager in all cases where there are safeguarding concerns.

Recording

Sister Systems are expected to keep accurate and complete records of all casework by using the Case management process. For safeguarding and early intervention cases, key workers should keep records in line with the needs of the school or Local Authority.

Appendix 1: Sister System Safeguarding and Early Intervention Flowcharts

Safeguarding/Early Intervention Flowcharts (Schools)

Early Intervention	Safeguarding
Have identified some concerns which could escalate to Safeguarding	Have identified concerns which require a safeguarding referral to social care
<ul style="list-style-type: none"> ● Update individual's Case notes file to reflect escalation record concerns and actions in case record ● Ensure that the case is discussed at the next supervision meeting and actions are completed and reviewed ● Monitor the case closely to identify any escalation, if concerns do escalate complete the Safeguarding concern process opposite 	<ul style="list-style-type: none"> ● Discuss concerns and escalate with Setting and Sister Systems Safeguarding Lead/deputy /manager within the next hour. ● Upload a copy of the referral to social care into the case file. ● Update individual's personal case file by completing a safeguarding concerns form ● Record any actions taken in individuals personal case file ● Request updates on referral from Setting and Sister System Safeguarding Lead/deputy and record information into case file. ● Ensure that the case is discussed at the next supervision meeting and actions are completed and reviewed

Appendix 2: Contact details of key personnel

The lead trustee within Sister System is Josephine Namisis-riley , contact details are:

Telephone:

Trustees

A lead trustee will be appointed who has a monitoring role and responsibility to ensure the organisation is following good practice and that policies are up to date. The lead Trustee will work with the Sister System safeguarding lead on a yearly report to trustees.

The Safeguarding Lead for Sister System is, project lead Tel No:..... , mobile..... email address:

The Deputy Safeguarding Lead is..... ,project lead. Tel No:, mobile:email address:

Project Management Team

Sister System Safeguarding lead:

- Will monitor training and induction attendance
- Supports and advises line managers and ensures that their training is up to date
- Monitors safeguarding work
- Will work with lead trustee to produce a yearly report
- Investigates allegations against staff (these investigations to be consistent with disciplinary procedure)

Appendix 3: Definitions of Abuse & Potential Indicators

Definitions of abuse	Potential Indicators
<p>Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.</p>	<ul style="list-style-type: none"> ● Bruising ● Bite marks ● Cigarette burns ● Broken bones ● Scalds ● Changes in behaviour including fear of parents or others, depression, running away from home.
<p>Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development, and may involve:</p> <ul style="list-style-type: none"> ● Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person ● Imposing developmentally inappropriate expectations ● Exploitation or corruption of children ● Seeing or hearing the ill treatment of another (for example witnessing domestic violence) ● Serious bullying <p>Some level of emotional abuse is involved in all types of ill treatment of children, through emotional abuse may occur alone</p>	<ul style="list-style-type: none"> ● Failure to thrive or grow ● Sudden speech disorders ● Developmental delay ● Neurotic behaviour i.e. sulking, hair twisting ● Inability to play ● Fear of making mistakes ● Self harm ● Fear of parents being approached re their behaviour
<p>Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening and includes penetrative (i.e. vaginal or anal rape or oral sex) and non-penetrative acts.</p> <p>It may also include non-contact activities, such as involving children in looking at, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways.</p>	<ul style="list-style-type: none"> ● Pain or itching in the genital /anal areas ● Bruising or bleeding near genital/anal area ● Sexually transmitted infections ● Vaginal discharge or infection ● Stomach pains ● Discomfort when walking or sitting down ● Pregnancy ● Bedwetting ● Sexual drawings or language

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

- Constant hunger, sometimes stealing food from other children
- Not seeking or attending medical assistance
- Having few friends
- Mentioning being left alone

Appendix 4: Vulnerable Adults

1. Principles

Professionals from any service working with adults at risk must be aware of the potential for adult abuse, as sister systems service is available to girls and young women up to the age of 21 yrs we are acutely aware of the following underlying principles in supporting vulnerable adults:

- Actively work with other services within the relevant Local Authority inter-agency framework to take action to prevent harm from occurring
- Actively promote the empowerment and well-being of adults at risk
- Actively support the rights of the individual to lead an independent life based on self-determination and personal choice
- Recognise people who are unable to make their own decisions and/or protect themselves, their assets and their bodily integrity
- Recognise that the right to self-determination can involve risk and ensure such risk is recognised and understood by all concerned
- When the right to an independent lifestyle and choice is at risk, ensure that the individual concerned has access to appropriate advocacy, including advice, protection and support from relevant agencies.

2. National Policy and Guidance

In 2000 the government published "No Secrets", giving guidance for responsible agencies in local areas to work in partnership on arrangements to prevent abuse of vulnerable adults and to deal robustly with incidents. This followed a number of serious incidents in which vulnerable adults had been subject to abuse and had not received the necessary protection or support. Local Authorities were given the responsibility for coordinating this work, and the arrangements now in place have developed from this guidance.

"No Secrets" defined vulnerable adults as those:

- Aged 18 years or over
- Who may be in need of community care services by reason of mental or other disability, age, or illness
- Who are or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation

["No Secrets", Department of Health/Home Office 2000]

Since 2000, definitions around vulnerable adults have developed significantly, and the initial focus on vulnerable adults in receipt of community care services has been broadened to include adults in a wider

range of vulnerable situations. With regard to terminology, there has been a shift to referring to vulnerable adults as “adults at risk. Key documents include:

- Statement of Government Policy on Adult Safeguarding (2011), which sets out the principle for use by all agencies involved in safeguarding vulnerable adults
- Law Commission Report on Adult Social Care (2011), outlined revised definitions of adults at risk of harm
- Government White Paper “Caring for our Future – Reforming Care and Support” (July 2012), proposing a single, modern law for adult care and support

3. Abuse of Adults

Abuse of adults at risk may be widespread, but is frequently unrecognised. Perpetration of abuse may be by someone in a position of trust, power or authority that uses his or her position to the detriment of the health, safety, welfare, or well-being of a vulnerable person. This may include relatives, friends, or professionals.

The prevention of abuse of adults at risk is a collective responsibility of all sections of society, although organisations such as the Sister System who may be working with or in contact with adults at risk hold a particular responsibility to ensure safe, effective services, and to facilitate the prevention, early detection, and reporting of abuse.

Abuse is defined as follows

- “Any act or failure to act, which results in a significant breach of a vulnerable person’s human rights, civil liberties, bodily integrity, dignity or general well-being, whether intended or inadvertent, including sexual relationships or financial transactions to which a person has not or cannot validly consent or which are deliberately exploitative”

Safeguarding Adults and Children with Disabilities against abuse: Council of Europe 2002

Abuse may include:

- Discriminatory abuse (including forms of harassment, slurs or similar treatment based on ethnic origin, religion, age, sexuality, gender, or disability)
- Sexual abuse (including contact or non-contact sexual acts to which the adult at risk has not consented, or to which they could not consent or were pressured into consenting)
- Psychological abuse (including threats of harm or abandonment, deprivation of contact or communication, withdrawal from services or support networks, humiliation, blaming or controlling)
- Financial or material abuse (including theft, fraud, exploitation, misuse or misappropriation of property, possessions or benefits, or pressure in connection with wills, property or inheritance)
- Neglect or acts of omission (including ignoring medical or physical care needs; failure to provide access to health, social care, or education; withholding of medication, nutrition or heating; or failure to report abuse or risk of abuse)
- Physical abuse (including misuse of medication; inappropriate restraint; or inappropriate sanctions)
- Institutional abuse (indicated by repeated instances of unsatisfactory professional practice or pervasive ill treatment)

4. Recognising Abuse

Patterns of abuse vary greatly, and may include:

- Long term abuse in the context of ongoing family relationships
- Situational abuse arising because pressures have built up or arising from challenging behaviour

● Neglect of a person's needs because those around him or not able to provide the necessary care

Indicators of abuse may be suggestive of abuse, but will rarely prove abuse has occurred, as they may arise from other causes. Where practitioners have seen possible indicators of abuse in relation to vulnerable adults, they should discuss these concerns with their manager to decide appropriate action. Indicators may include:

- Injuries inconsistent with lifestyle of the person at risk or not fully explained
 - Signs of withdrawal, depression or stress
 - Observation of lack of respect shown to vulnerable adults, including punitive or bullying behaviour
 - Failure to meet the needs of vulnerable adult
 - Exclusion from rights or services
-
- Unusual or suspicious financial activity including vulnerable person lacking belongings or services they can clearly afford
 - Inadequate heating or lighting

Any allegation of abuse must be taken seriously, however insignificant it may seem. In all such cases, key workers must immediately discuss the allegation with their manager, to decide appropriate action.

5. Reporting Abuse

Where there is reason to believe that adult abuse is or may be taking place, this must be reported to the Sister System safeguarding lead/deputy and one of the appropriate adult care teams within the relevant Local Authority. This may include:

- Adult Social Care teams
- Learning Disability teams
- Hospital social work teams
- Mental Health teams
- Police investigation teams
- Emergency duty services

When reporting suspected abuse, please note the following:

- Where a person is in immediate danger or in need of medical attention, the appropriate emergency service must be called
- Wherever possible we should act in accordance with the wishes of the adults at risk. Where a vulnerable adult may not have the capacity to consent to actions taken to protect them, Sister System will promptly seek expert advice with regard to our duties.
- Record accurately and in detail all possible evidence of abuse, using the person's own words where possible, and record all actions taken

Contact & Reporting:

If you have any safeguarding concerns please complete the safeguarding concerns form and email it to directors@sistersystem.org on the same day that the concern is raised.

If you need to speak to someone about any concerns please call:0208 059 1055 in confidence.

Appendix 5: COVID-19 Safeguarding and Child

Protection Policy for Early Years Providers, Schools and Colleges

Introduction

COVID-19 (commonly known as Coronavirus) has presented a huge challenge nationally to the normal running of education and child care provision. On 20th May 2020 the Government updated their guidance 'Coronavirus (COVID-19): safeguarding in schools, colleges and other providers' which included an announcement that schools are expected to welcome back more students and this policy addendum is written to reflect the government guidance.

Education and child care settings are still expected to remain open to those children who are identified as vulnerable¹ and their needs cannot be catered for at home, or they need to attend the education/child care setting as it is a safe place, irrespective of what year group they are in. This appendix has been prepared to explain key changes and interim measures being taken within our setting to continue to meet our safeguarding requirements during these extraordinary times.

Status of this document

This is an appendix to the main body of our Safeguarding and Child Protection Policy and will be effective from **March 23rd 2020** until the setting returns to business as usual, following the COVID-19 pandemic.

It has been formally agreed and signed off by **Okela Douglas, Director and DSL**.

Queries about the contents of this document should be directed to:

Name: Okela Douglas

Job Title: Director

Email: directors@sistersystem.org

Telephone: **07957 731234**

All staff and volunteers working in school, in the community or those working remotely will be provided with a copy of this addendum via **Sister Systems Covid-19 safeguarding zoom to be held on March 26th** and be required to confirm to the DSL that they have read and understand this document.

Designated Safeguarding Lead (DSL) arrangements

It is vital that while our setting remains open a suitably trained DSL is available for consultation and advice.

The optimal scenario for our setting and one we will strive to achieve is to have a trained DSL or deputy available on site. Due to staff self-isolating, social-distancing or being physically unavailable for other reasons, it is recognised this may not always be possible, and where this is the case there are two options we will implement, the first being the preferred and second a backup option:

1. A trained DSL or deputy from the setting will be available to be contacted via phone or online video i.e. zoom, if they are working off site
2. Sharing trained DSLs or deputies with **first Star scholars Uk** until our own trained DSL can return to work or be available.

Where a trained DSL or deputy is not on site, in addition to one of the above options, the setting will have a senior leader who will take responsibility for co-ordinating safeguarding on site. This person will update and manage access to child protection files, liaise with the offsite DSL (or deputy) and as required liaise with children's social workers where they require access to children in need and/or to carry out statutory assessments at the setting.

¹ Vulnerable children include those who have a social worker, those children and young people up to the age of 25 with education, health and care (EHC) plan, and children who the setting have otherwise identified as vulnerable.

Our DSL, deputy DSL and others with designated roles are identified in the main body of our Safeguarding and Child Protection Policy. In the event one of the above scenarios is implemented and the DSL changes, this will be communicated to staff by **email**.

Contacting Haringey & Enfield first Response

Making referrals into Haringey & Enfield's Children's First Response will continue as usual, with referrals being made via the Sister System referral form, and telephone consultations taking place when advice is required. Where possible the referral will be made by the DSL, however if the DSL is not available in person the senior leader who is co-ordinating safeguarding on site may be required to make the referral after getting advice from a suitably trained DSL.

- Telephone – 0208 489 0000 or duty1 0208 489 5842 or duty2 0208 489 5852
- First response: 0208 489 4592 Or Ext:4470
- Email – firstresponseteam@haringey.gov.uk (0208 489 1400)
- [Email- firstresponseteam@enfield.gov.uk](mailto:Email-firstresponseteam@enfield.gov.uk)

Contacting the Local Authority Designated Officer (LADO)

In the instance a referral to the LADO is necessary this will be actioned by the **DSL** within 1 working day of the allegation coming to light. Should they not be available then Sister Systems **Programme Manager** will make the referral.

Contact methods for the LADO will remain the same with all LADO referrals being made via the online referral form. Consultation by phone may be necessary in which case this will be done via Enfield's or Haringey's or Adults Children's First Response (contact details above).

- Email – LADO@haringey.gov.uk or LADO@enfield.gov.uk

If it is decided that a LADO Meeting is necessary the setting will take part in this via Microsoft Teams or zoom which ever is the software being used by the LADO to ensure confidentiality is maintained .

Attendance of Vulnerable Children and Young People

The attendance information for vulnerable children will be reported to the Key worker on a sessional basis. The method for doing this is **through the email directly to the YP's named Keyworker with Sister system's DSL copied into all comms**.

Vulnerable children may not be attending school for other reasons including self-isolation, social-distancing or for another reason, these will be monitored by the setting and contact with the child and their family will be maintained via **daily**) phone calls. When phone calls are not answered and contact cannot be established with a family, the setting will take the following measures:

- The Vulnerable Children's sessional Log Attendance sheet will be completed and sent to Trafford Children's First Response by email.

For those students/learners who are not physically attending the setting we still have a duty to keep them safe, including online. The following measures have been implemented to ensure that contact with children is maintained and setting staff can maintain oversight of their welfare as best as practically possible.

- weekly email to programme Manager
- Web chats with peer mentors & programme facilitators to complete work
- Weekly phone calls with therapeutic mentor

If staff have any concerns about children they will follow the standard reporting procedure outlined in the main body of our Safeguarding and Child Protection Policy.

Staff Training

When the setting is open it will be staffed appropriately and all staff will satisfy the training requirements of 'Keeping children safe in education, September 2019'², in that they will have had copies of the following policies and had them explained to them how they operate in the setting:

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Staff Code of Conduct
- Safeguarding response to Children who go missing from education
- Role of the DSL (including the identity of the DSL and any their deputy/deputies)
- Part one and Annex A of Keeping children safe in education, September 2019.

In addition to the above all staff will have received appropriate safeguarding and child protection training. Further to this, all staff receive regular safeguarding updates, this is done in the following ways:

- Staff meetings (virtually at the moment)
- supervision
- Staff information board in office
- Email bulletins
- Newsletters

Allegations against Adults working with Children & Young People

Any staff member who works in the setting will be aware of the process for sharing concerns about colleagues or other adults who works with children & YP's in regulated activity. In our setting they will report these concerns directly to the **DSL** as soon as practically possible, ideally face to face, however during challenging times that may not always be possible, and a telephone call or zoom is also acceptable, but an email or text message is not acceptable as this may not be picked up in a timely manner.

It is made clear to staff in training, induction and in our Whistleblowing Policy that they should not consult or speak of the concern/allegation with other parties, without the expressed permission of the **DSL** so as not to damage the integrity of any potential investigation, nor tarnish the reputation of colleagues prior to any due process.

² <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> - Department for Education statutory guidance for schools and colleges on safeguarding children and safer recruitment. Review December 2022