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OWNER	Head of Safeguarding		
EXECUTIVE LEAD	Director of Operations		

Safeguarding & Child Protection Policy

1. Background

Place2Be’s mission is to improve the mental wellbeing and prospects of children, their families and school communities across the UK. Children may, through the relationships provided to them by Place2Be, take the opportunity to share information about a harmful experience or incident. This may happen in a direct way through a verbal disclosure, or indirectly through play or demeanour or through another child.

In addition, there may be some physical evidence of neglect or apparent injury, which is noted by a member Place2Be’s staff or Counsellor on Placement. Place2Be staff and Counsellors on Placement who are working with parents may also have cause to be concerned about the welfare of that person as well as their children.

2. Purpose and application of Policy

Place2Be believes that it is always unacceptable for a child or young person to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children and young people. We are fully

accountable for ensuring appropriate actions are taken by us in order to safeguard any of our service users. This may also include ensuring our partner agencies have taken appropriate actions.

For the purpose of clarity in this policy, when we refer to Children or Young people, we mean from the ages of 0 (unborn) and anyone who has not yet reached their 18th birthday.

For any concerns relating to a young person aged 18 years old or above (or 16 years in Scotland), please refer to our [Adult Safeguarding Policy](#). The child centred approach is fundamental to safeguarding and promoting the welfare of every child. A child centred approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families.

We recognise that:

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

The purpose and scope of the policy

- to provide protection for the children and young people who receive Place2Be's services, including the children of adult clients.
- to provide all staff and Counsellors on Placement with guidance on procedures they should adopt if they suspect a child or young person may be experiencing, or is at risk of, harm.
- the policy applies to all staff, including senior managers and the board of trustees, paid staff, Counsellors on Placement and sessional workers, agency staff, students or anyone working on behalf of Place2Be.

We will seek to safeguard children and young people by:

- valuing them, listening to and respecting them.
- adopting safeguarding and child protection guidelines.
- recruiting staff and Counsellors on Placement safely, ensuring all necessary checks are made.
- sharing information about child protection and good practice with children, parents, staff and Counsellors on Placement.
- sharing information about concerns with agencies who need to know, and involving parents and children appropriately.
- providing effective management for staff and Counsellors on Placement through supervision, support and training.

It is essential that members of Place2Be's team are aware of their duties concerning safeguarding and ensure that:

- the safety and wellbeing of the child is promoted.

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- the law and statutory guidance concerning child protection and safeguarding is complied with.
- the policies of the school, the Local Authority, Safeguarding Partners / Child Protection Committees in which Place2Be is working are respected.
- all staff and Counsellors on Placement at Place2Be comply with the child protection and safeguarding policy.

It is not the role or responsibility of Place2Be to investigate allegations of harm or risk of harm.

Disclosures or concerns arising out of any of these areas of service delivery will be treated the same and are all covered by this policy.

3. Statutory and legal framework

3.1 England and Wales

The [Children Act 1989](#) and [2004](#) provide the overall framework for safeguarding children and promoting their welfare. The child's welfare is to be the paramount consideration in all decision-making.

The Government's guidance on safeguarding children in England is called [Working Together to Safeguard Children 2018](#) (often shortened to Working Together). Working Together acknowledges the need for all providers of children's services, including those in the voluntary sector, to work in collaboration and to agreed local standards.

[Keeping Children Safe in Education 2021](#) sets out what schools and colleges in England must do to safeguard and promote the welfare of children and young people under the age of 18

The [Wales Safeguarding Procedures & Practice Guides](#) (2019) provide the common standards to guide and inform child protection practice in each of the Local and Regional Safeguarding Children Boards across Wales. [Keeping Learners Safe 2015](#) is the Welsh Assembly statutory guidance setting out the infrastructure and arrangements that need to be in place to ensure that people in the education service have the skills, means and training necessary to ensure children and young people are protected from harm.

Section 157 and 175 of the [Education Act 2002](#), and the [Education and Inspections Act 2006](#), places upon School Governors the duty to ensure that schools safeguard and promote the welfare of children.

3.2 Scotland

The legal duty to investigate and report in relation to child care and child protection issues is derived from two sources: the Police (Scotland) Act 1967 which provides the mandate for police officers; and the [Children \(Scotland\) Act 1995](#), section 53 of which provides the mandate for local authorities and section 56 for Reporters to the Children's Hearing.

The [Social Work \(Scotland\) Act 1968](#) provides the primary mandate for social work intervention in Scotland and section 12 of this legislation requires local authorities to provide services to promote the welfare of children in need.

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In 2014 (now updated for 2021), the Scottish Government launched the [National Guidance for Child Protection in Scotland](#). This guidance provides the context for child protection work in Scotland, outlines the roles and responsibilities of services and organisations, provides a framework for identifying and responding to concerns about children and provides additional information on child protection in specific circumstances. The guidance clearly states how Child Protection is the responsibility of all who work with children and families, regardless of whether that work brings them in to direct contact with children.

[Getting it right for every child \(GIRFEC\)](#) (Scottish Government 2012) stipulates a consistent approach in Scotland for people to work with all children and young people and promotes action to improve well-being in eight areas, taking in to account the UN Convention on the Rights of the Child. These well-being indicators state that children and young people must be: healthy, achieving, nurtured, active, respected, responsible, included and, above all in the context of this policy, safe. The primary indicator for child protection is to keep a child safe and, in doing so, attention is given to other areas of well-being as appropriate.

4. Recognition and reporting

It is essential that those who work with children and families should be alert to the signs of child abuse. There are four main categories of abuse:

Physical Abuse - A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, 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.

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- protect a child from physical and emotional harm or danger.
- ensure adequate supervision (including the use of inadequate care-givers).
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Emotional Abuse - The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve:

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

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- age or developmentally inappropriate expectations being imposed on children.
- interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- seeing or hearing the ill-treatment of another.
- serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone (Working Together, 2018).

As highlighted above, Domestic Abuse is generally treated as falling under emotional abuse. The cross-government definition (2014) of domestic violence and abuse is as follows:

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.

Place2Be considers that domestic abuse is a child protection issue and that if children witness or hear domestic abuse, this must be treated as a child protection matter, even if they are not directly involved in the incidents. The [Adoption and Children Act 2002](#) states that impairment can be caused by seeing or hearing the ill treatment of another.

Sexual Abuse - Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children (Working Together, 2018)

Other safeguarding concerns:

Child Criminal Exploitation - As set out in the [Serious Violence Strategy](#), published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity

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appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Child Sexual Exploitation - Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Contextual safeguarding - Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.

Contextual safeguarding facilitates looking at these areas, when assessing a child / young person's needs, and is used by some of the local authorities that we work in.

The areas considered are:

Home - Domestic abuse, siblings or possible neglect.

Peer group - Peer association, intimate partner violence and peer group sexual offending.

School - Bullying, corridor culture and peer recruitment.

Neighbourhood - Gang affected neighbourhood, robbery, CSE in parks and shopping centres.

County Lines - As set out in the Serious Violence Strategy, published by the Home Office, county lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Extremism and Prevent Duty - Any concerns about radicalisation and extremist views or behaviours in children and young people must be reported as a safeguarding concern. Place2Be works in line with [Prevent Duty 2015](#) guidance and will consult with local Prevent Coordinators where necessary. "Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist" (Working Together 2018).

Female Genital Mutilation (FGM) - Concerns that a child has been, or may be about to be, subjected to FGM, fall under this policy and must also be reported as a safeguarding concern.

Forced Marriage - In forced marriage, one or both spouses do not consent to the marriage and some element of duress is involved. Duress includes both physical and emotional pressure and abuse. Forced marriage is primarily, but not exclusively, an issue of violence against females. Most cases involve young women and girls aged between 13 and 30, although there is evidence to suggest that as many as 15 per cent of victims are male. These procedures are aimed at dealing with forced marriage for a child / young person under 18 years of age.

Online Safety - The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).
- Commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Peer-on-Peer Abuse - Peer on peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Self-harm - Self-harm is a broad term that can be used to describe a variety of behaviours that lead to physical harm. These include self-cutting or scratching the skin, burning/branding with cigarettes/lighters, scalding, overdose of tablets or other toxins, tying ligatures around the neck, punching oneself or other

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surfaces, banging limbs/head and hair pulling (Mental Health Foundation, 2006). It may also include risk taking behaviours where the child / young person is careless for their own safety and there is a risk of physical harm. It also includes neglect of physical health for example young people with insulin dependent diabetes who intentionally miss insulin doses. Self-harm usually occurs in response to emotional distress.

‘So-called’ Honour-Based Violence - The term ‘honour crime’ or ‘honour-based violence’ embraces a variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where their family or their community is punishing the person. They are being punished for (actually or allegedly) undermining what the family or community believes to be the correct code of behaviour. In transgressing this correct code of behaviour, the person shows that they have not been properly controlled to conform by their family and this is to the ‘shame’ or ‘dishonour’ of the family.

Suicide / Suicide Ideation - The term ‘suicide’ means an act that is intended to end one’s life. Suicidal ideations, often called suicidal thoughts or ideas, is a broad term used to describe a range of contemplations, wishes, and preoccupations with death and suicide (PubMed, 2021). These issues can be caused by many factors, including depression and mental illness, stress, financial problems, relationship breakdown, bereavement and abuse.

What to do when you suspect a safeguarding concern

For safeguarding advice / guidance and reporting, staff and Counsellors on Placement should contact their line-managers in the first instance. In cases when they are not available, they should contact the Place2Be Safeguarding team.

At Place2Be, the person designated to take responsibility for child protection is the Head of Safeguarding along with the Deputy Head of Safeguarding and Safeguarding Officers, who are available to all staff for advice and guidance. The Head of Safeguarding reports directly to the Director of Operations.

Head of Safeguarding- Sharon Cole – 07808 639629
Deputy Head of Safeguarding – Daniel Jarrett- 07810 856013
Safeguarding Officer – Verity Coles – 07976 227073
Safeguarding Officer – Chaya Patel – 07976 272663
Safeguarding Officer – Emma Geiringer - 07976 210626

Whistleblowing – If you are concerned of a wrongdoing or that appropriate action has not been taken to deal with a concern, then this is when Whistleblowing should take place. This is sometimes referred to as ‘making a disclosure’ or ‘blowing the whistle’. The wrongdoing will typically (although not necessarily) be something you have witnessed at work. Please see our [Disclosure Policy \(Whistleblowers’ Charter\)](#) on the Intranet.

5. Working Virtually

Safeguarding of those who avail of our services is a fundamental role we all play. This is true when we are working face to face, remotely or virtually. Our policies and procedures remain the same irrespective of how we are delivering our services.

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To read the full guidance on working remotely and virtually, please [click here](#).

6. Confidentiality and Information Sharing

In establishing an initial contract with the child and the parent, the limits of confidentiality must be explained, i.e. that Place2Be staff and Counsellors on Placement will need to inform the designated Child Protection Officer / Designated Safeguarding Lead in the school if there are concerns about the child's safety. This is an important part of the contract with the child at the outset of the work. This is in line with national guidance: 'Working Together 2018', 'Keeping Children Safe in Education 2021' and 'Information Sharing 2018'. It is for the child or parent to choose what is and is not spoken about during counselling sessions or assessments. The duty to safeguard children and share information about child protection concerns takes priority over all other considerations, including the confidential nature of the counselling relationship. Place2Be fully participates in multi-agency working, in line with government guidance, in order to share information and safeguard children.

"The Data Protection Act 2018 and GDPR do not prohibit the collection or sharing of personal information, but rather provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them".

7. Safer Recruitment Practices

The safeguarding and child protection policy must also safeguard children from harm from those placed in positions of trust or care. At Place2Be the following steps are taken:

- a) No direct work with children can begin without receipt of two satisfactory references and enhanced DBS/PVG (Scotland) clearance of staff and Counsellors on Placement working directly and alone with children.
- b) A DBS/PVG (Scotland) check is carried out for all Place2Be staff and will be updated on a three yearly basis or on a 'live' basis for those registered with the DBS/PVG update service.
- c) Safeguarding Induction Training is required to be completed by staff and Counsellors on Placement who work directly with children.
- d) It is a requirement of Place2Be that viewing panels are in place in doors of Place2Be rooms, so that the P2B school-based staff or other staff members can see through the viewing panels.
- e) Place2Be provides supervision for Counsellors on Placement on the day their clinical work takes place.
- f) Place2Be and the school management team maintain an overview of Place2Be involvement with children.
- g) The relationship between the member of the Place2Be team and a child who receives the service must be restricted to the professional forum, where services are delivered in accordance with BACP ethical standards;
- h) If any member of Place2Be's staff in the school has concerns regarding the conduct of another member of Place2Be staff or Counsellor on Placement, they have a duty to report this concern in confidence to their own line manager. This should be referred directly to the Head of Safeguarding

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if more appropriate. Concerns about, or allegations against, members of Place2Be staff or Counsellor on Placement must be referred to your Line Manager, or, if more appropriate, the next manager up. They will then report to the Director of People & Culture, the Head of Safeguarding, and the Head of Legal and Compliance immediately. In these circumstances, it may also be necessary to follow the [Critical Incident Management Policy](#).

- i) If a member of the Place2Be team in the school has concerns regarding the conduct of any member of the school staff, they have a duty to follow this procedure and report to the school's designated child protection officer / designated safeguarding lead, and their Area Manager. We are committed to reviewing our policy and good practice annually.
- j) If working with children or adults via digital means e.g. zoom or via phone, this should be agreed via your Area Manager and be carried out following digital working guidelines (COVID 19 guidance).

8. Managing Allegations against Staff or Volunteers

As a charity working with vulnerable children, Place2Be has a duty to ensure that where an allegation against a member of staff or Counsellor on Placement has been substantiated, steps are taken to investigate the allegation and prevent other children being harmed.

Place2Be equally has a wider duty to ensure that the necessary authorities are informed of concerns about situations where a member of staff or Counsellor on Placement has harmed a child, placed a child at risk of harm, or is unsuitable to work with children.

Place2Be therefore takes responsibility for making the required referrals, to external regulatory bodies such as but not limited to the Disclosure and Barring Service (DBS) and PVG (Scotland) and/or the British Association for Counselling and Psychotherapy (BACP).

We will contact the LADO (Local Authority Designated Officer) immediately and establish if they are happy for Place2Be / School to carry out the investigation and then feed back to them on the outcome. The LADO may also determine that they will carry out the investigation. ***Please see our [Allegations Against Staff and Volunteers Policy and Procedure on the Intranet](#).***