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the267project

Safeguarding & Child Protection Policy



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1. General Policy Statement

1. The 267project has a moral duty to ensure that it functions with a view to safeguarding and promoting the welfare of children and young people. Safeguarding is everyone's responsibility and aims to enable all children and young people to have optimum life chances and to enter adulthood successfully.
2. Safeguarding and promoting the welfare of children and young people refers to:
 - Protecting children from maltreatment
 - Preventing impairment of children's health or development
 - Ensuring children are growing up in circumstances consistent with this provision and effective care.

'Child Protection' refers to the recognised policies and procedures put into practice when a Safeguarding concern is raised to a level where outside agencies are involved to ensure the child's welfare and safety, including the involvement of Social Services or the Police. The term 'child protection' may be used within Safeguarding policies to denote general steps that are taken to ensure a child's welfare.

Throughout these policies and procedures, reference is made to "children", "young people" and/or "children and young people". These terms may be used interchangeably and are used to mean "those under the age of 18". Care should be taken when working with vulnerable young people over the age of 18, who, whilst not considered to be 'children' may require increased safeguarding commitments. A vulnerable young person may be one who:

- Is, or has been, a Looked After or Adopted Child
- A young adult with mental health concerns
- A young adult with additional learning needs



- A young adult with a disability

The trustees are committed to ensuring that the organisation:

- Provides a safe environment for children and young people
- Collaborates with youth and children's leaders as they support any child or young person suffering spiritually, emotionally, mentally or relationally who attends a 267 event or residential.
- Takes appropriate action to see that such children and young people are kept safe from harm

In pursuit of these aims, the trustees will approve and regularly review policies and procedures with the aim of:

- Working with churches, youth leaders, volunteers, relevant statutory and voluntary agencies to promote issues relating to the welfare of children and young people and the promotion of a safe environment for the children and young people.
- Providing procedures for reporting concerns and acting promptly whenever a concern is raised about a child or the behaviour of an adult.
- Ensuring a Designated Safeguarding Lead (DSL) is in place, together with a Nominated Trustee, responsible for safeguarding, with relevant contact details available to all.
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff.
- The safe recruitment of staff. The 267project seeks to liaise with partner churches regarding the safe recruitment and appropriate training of volunteers (equivalent to C1 Anglican training). The 267project only works with partner churches that adhere to safeguarding procedures and carry out DBS checks.

3. The organisation has nominated Mike Palin as Designated Safeguarding Lead person with special responsibility for Safeguarding and Child Protection issues. He will undertake appropriate training.



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4. Staff and volunteers working with children will receive training adequate to familiarise them with Child Protection issues and responsibilities and the organisation's procedures and policies, with refresher training at least every 2 years.
5. The trustees will receive from the Nominated Trustee, with lead responsibility for Safeguarding and Child Protection, Anne Clark, an annual report that reviews how the duties have been discharged.

2. Application of Policy

This policy applies to all members of the 267project team who have any contact with young people in the context of any activity undertaken by, on behalf of, or in association with, the 267project. This will include the Director, Employees, Interns, Volunteers and Trustees.

Each associate church will have its own Safeguarding Policy, which will name a senior member of staff as leading on Safeguarding Issues. They should take action under their policy, according to the flow charts in Section 5 below.

Personal responsibilities are as follows:

The Director will act as the DSL and must ensure that:

- All members of the team to whom the policy applies are issued with a copy of the Safeguarding and Child Protection Policy at their induction and enrolled in a training session.
- Regular training and updates are provided.
- Records are kept in a secure place of all reported incidents, also of any breaches of this policy, all in accordance with Data Protection Policy.
- The Nominated Trustee is in place.

The Trustees must:

- Nominate a trustee as responsible for overseeing operation of the policy.
- Through the Nominated Trustee, satisfy themselves that the policy is properly implemented.



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- Maintain up to date awareness of the legal framework within which this policy operates.
- Arrange for regular review of the policy, usually annually.

All members of the team to whom the policy applies must:

- Maintain personal familiarity with all its requirements
- Be vigilant and promptly implement its procedures as they arise.
- Deal with issues in a confidential and professional manner; information should only be shared with others who are directly related to the processes put into place.

The policy requires 267project members to report all incidents internally to the DSL, in addition to any other actions that may be required. If the DSL cannot be contacted the report should go to the Nominated Trustee.

The details of the reporting procedure depend, to a significant degree, on the context, which is summarised in Section 5.

3. Key Contacts & Contact Details

The following are the key contact persons within the267project for Child Protection issues:

Designated Safeguarding Lead (DSL)	Mike Palin
Work telephone number	07789 815516

Nominated Trustee responsible for Child Protection (267 Safeguarding Officer)	Anne Clark
Home telephone number	01727822072



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Mobile phone number	07767687083
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Chair of Trustees	Sean Ryan
Home telephone number	01727765747
Mobile phone number	07970834226

Project Youthworker	Claire Banham
Mobile phone number	07930676373

4. Defining Abuse

The trustees recognise the following as definitions of abuse:

An abused child is any person under the age of 18 who is suffering, has suffered from, or is believed to be at significant risk of physical injury, neglect, emotional or sexual abuse. This applies regardless of the context of any maltreatment, which might be at the home, school or any other setting. The perpetrator might be an adult or another child (including sibling) or more than one individual. Abuse occurs not only when harm is inflicted, but also by failure to prevent harm.

i Physical Abuse

Physical abuse causes harm to a child's person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately, recklessly, or be the result of a deliberate failure to prevent injury occurring.



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If a member of staff, in the course of their work, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18, the member of staff must report this directly to the police.

Recognising Physical Abuse:

- Injuries or burn that the child tries to cover up, for example insisting on wearing items of clothing not appropriate to the weather or situation.
- Reluctance to discuss injuries or attempting to give implausible explanations.
- Fear of particular people being contacted.
- Fear of physical contact – shrinking away
- Fear of medical help
- Self-destructive tendencies including self-harm (although this does not necessarily indicate abuse, it may indicate mental health issues).
- Aggression
- Extremely aggressive relationship with sibling or excessive fear/avoidance of sibling.

ii Neglect

Neglect is the persistent or severe failure to meet a child or young person's basic physical and/or psychological needs. It will result in serious impairment of the child's health or development.

Recognising Neglect:

- Always being hungry or very tired – may scavenge
- Poor personal hygiene
- Poor state of clothing
- Untreated medical or dental problems
- No social relationships
- Destructive tendencies



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iii Sexual Abuse

Sexual abuse involves a child or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant.

Recognising sexual abuse:

- Being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age.
- Personality change e.g. becoming clingy
- Regressing to younger behaviours
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Trying to be over-good or over-reacting to criticism

iv Emotional Abuse

Emotional abuse occurs where there is persistent emotional ill-treatment or rejection. It causes severe and adverse effects on the child's or young person's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse.

Recognising emotional abuse:

- Sudden speech disorders
- Continual self-deprecation e.g. 'I'm stupid, ugly, worthless'
- Overreaction to mistakes
- Extreme fear in new situations
- Inappropriate response to pain, 'I deserve this'
- Neurotic behaviour e.g. hair-twisting, self-mutilation



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v Cyber Bullying / Abuse

Cyber bullying is using the Internet, cell phones, video game systems, or other technology to send or post text or images intended to hurt or embarrass another person.

Note that the267project has a separate Social Media and Electronic Communication Policy.

vi Peer on Peer Abuse.

Peer on peer abuse is any form of the above abuses being carried out between children under the age of 18. This can include between siblings, as well as between children in friendship groups or as part of gang activity, including gang initiation. Children may sometimes not recognise it as abuse, either thinking it is part of familiar relationships or 'bullying'. All staff should be aware that peer on peer abuse will not be tolerated and will not be accepted as 'banter' or 'just having a laugh' or 'part of growing up'

Recognising Peer on Peer abuse:

- May occur via social media, particularly through use of 'sexting' or use of indecent images.
- Physical abuse including biting, hair pulling, shaking
- Sexual harassment and sexual violence
- Initiation/hazing type rituals



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5. Procedure to be Followed When Concerns Arise

Event	Type	Action	Report & Inform	Ongoing
Fuel	Disclosure	Speak to Claire Banham or Mike Palin.	Report to: Mike Palin.	Follow up with the young person and the linked church. 267 report to be filed appropriately. Ensure that 'Record of Concern' form ¹ is completed.
	Incident	Inform Claire Banham or Mike Palin. Complete 'Record of Concern' form ¹ .	Inform: 267 Safeguarding Officer; document what happened/what was said.	
X:Site	Disclosure	Speak to Claire Banham or Mike Palin. Complete 'Record of Concern' form ¹ .	Report to: Mark Slater and Mike Palin. Inform: the 'sending church' Safeguarding Officer and 267 Safeguarding Officer.	
	Incident	Speak to associated church youth or children's leader if present, if not speak to Claire Banham or Mike Palin. Complete 'Record of Concern' form ¹ .		
Residential	Disclosure	Speak to Claire Banham or Mike Palin. Complete 'Record of Concern' form ¹ .	Report to: Claire Banham, Mike Palin. Inform: the 'sending church' Safeguarding Officer and 267 Safeguarding Officer.	
	Incident	Speak to associated church youth or children's leader if present, if not speak to Claire Banham or Mike Palin. Complete 'Record of Concern' form ¹ .		
Any other 267 Event	Disclosure	Inform Claire Banham or Mike Palin. Complete 'Record of Concern' form ¹ .	Report to: Mike Palin. Inform: the 'sending church' Safeguarding Officer and 267 Safeguarding Officer.	
	Incident			
Any allegation involving Mike Palin or Claire Banham	Any	Contact either 267 Safeguarding Officer and/or 267 Chair of Trustees. Complete 'Record of Concern' form ¹ .	Report to: either 267 Safeguarding Officer and/or 267 Chair of Trustees.	

¹ Refer to Appendix 1 in section 11.



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6. Disclosure of Abuse & Procedure for Reporting Concerns

1. How to respond when someone wants to talk about harm or abuse:
 - Listen – and keep listening.
 - Try to avoid asking leading questions.
 - Avoid passing judgment on what you are told.
 - Never promise confidentiality.
 - Explain what you intend to do and don't delay in taking action.
 - Contact the DSL – or in their absence take action yourself.
 - Write down what is said – details below.

2. What to do when a child talks about harm or abuse.
 - You need to make a careful detailed, accurate, secure written record of what has been observed as follows:
 - Make notes as soon as possible (preferably within one hour of the child talking) including description of any injury, and a drawing of its location and shape on the child's body.
 - Write down exactly what the child has said and when s/he said it, what was said in reply and what was happening immediately beforehand (e.g. a description of the activity).
 - Write down dates and times of these events and when the record was made.
 - Written notes should be signed and dated and kept securely and confidentially in a locked file.
 - Write down any action taken and keep all handwritten notes even if subsequently typed up.

The notes should be recorded on the Safeguarding Observation Record or can be transferred on to this as soon as possible. Copies of this form should be available to staff from the 267project office. These should be given to the DSL or kept securely and confidentially until this is possible.

The DSL and Nominated Trustee will then take the decision whether the incident needs to be referred to Children's Services as a Child Protection issue. Feedback to the member of staff who reported the incident will take place at a later date, in line with advice from Children's Services or the Nominated Trustee.



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7. Reporting & Dealing with Allegations of Abuse against Members of Staff

The procedures apply to all staff, whether trustees, administrative, management or support, as well as to volunteers. The word “staff” is used for ease of description.

- In rare instances, staff of Christian organisations have been found responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations of child abuse made against them. The 267project recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay. In the event of an allegation against a member of staff the Chair of Trustees or the Nominated Trustee with responsibility for Safeguarding should be contacted as soon as possible after the allegation.
- The project recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual’s reputation, confidence and career. Therefore, those dealing with such allegations within the organisation will do so with sensitivity and will act in a careful, measured way.
- All staff should be aware that inappropriate behaviour towards children and young people is unacceptable and that the conduct towards children and young people should be beyond reproach. In addition, it should be noted that, under the Sexual Offences Act 2003, it is an offence for a person aged 18 or over to intentionally behave in certain sexual ways in relation to a child aged under 18, where the adult is in a position of trust in respect of the child, even if the behaviour is consensual.
- On this being brought to the notice of a member of 267project, the person receiving the allegation will take it seriously but not personally seek to determine its validity. The DSL should be informed as soon as possible and a record made as above. No further written or detailed statements, or other investigations, will be taken by the DSL until the Nominated Trustee has been contacted. An assessment will be made of how the matter should be dealt with. If it is decided that action through formal procedures must be taken, a Child Protection referral will be made to Children’s Services and the Director will suspend the 267project member. If not, appropriate action will be agreed and following a briefing from the Nominated Trustee or Children’s Services, the Director will inform the member of staff.



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- A similar process should be followed if a 267project member has concerns about a fellow member. Where this member of staff is the DSL, or they are implicated, the matter should be immediately taken up with the Nominated Trustee or Children's Services.

8. Safer Recruitment & Selection Procedure

The 267project is committed to safe recruitment. The following guidelines should apply to staff who work with children.

- The post or role should be clearly defined.
- The key selection criteria for the post or role should be identified.
- Verify previous employment history and obtain professional and character references for staff.
- Disclosure and Barring Service disclosure checks done for employees and trustees (maintain sensitive and confidential use of the applicant's disclosure).
- Use a variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks).
- Discuss any matter revealed in a disclosure with the person seeking the position, before withdrawing a conditional offer of employment.
- Make the applicant aware of our policy and that any offer is conditional upon satisfactory DBS checks.

Volunteers from partner churches, who work with the Project, are recruited through their own procedures.

Regular volunteers should have a DBS check done. Volunteers who help on a 'one-off' basis, or those who have not yet had their DBS check returned, should not work alone with children. A risk assessment may be completed by the DSL if necessary.

9. Safe Working Practice

267project members must take extreme care not to place themselves in a position where they would have no defence against an allegation of impropriety, other than their own recount of events. Basic precautions include:

- Working in open spaces or in the presence of other adults. Where one-to-one conversations need to be held, these should be within sight and/or sound of others.



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- Keep face to face or online conversations as clear as possible, unambiguous and, where possible, unable to be misinterpreted.
- Avoid close physical contact.
- Where 267 members meet with young people in public spaces such as coffee shops, consideration should be given to how the young person can travel safely to/from the venue. If at all possible they should make their own way; a lift should only be offered where there is no reasonable alternative. A third party should be informed of this, plus time of leaving and arrival for each journey.

Further guidance is available in the Social Media and Communication Policy

10. Document History

Version	Date	Author(s)	Change Description
1.0	June 2019	Anne Clarke Liz Buckley	Rewrite / update of previous policy. Updated to reflect current best practices.
1.1	Jul 2019	Sean Ryan	Formatting amends; added Claire Banham's contact details, amended process flowcharts to ensure that 'Complete Record of Concern' applies to all incidents and disclosures; added Record of Concern as an appendix; added Audit Form as an appendix.



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11. Appendix 1: Record of Concern Form

This form should be used to record any disclosure or safeguarding concern or incident, and any original notes taken should be attached to it. PART 1 is to be completed by you. PART 2 is to be completed by the DSL. There are 4 (four) pages of the form in total.

Note: **CYP** = Child or Young Person, **VA** = Vulnerable Adult, **DSL**=Designated Safeguarding Lead².

PART 1:	To be completed by you.
Event where incident/disclosure took place (e.g. Residential, Xsite, Fuel...)	
Date & Day when incident/disclosure reported	
Time when incident or disclosure reported	
Full name of the CYP/VA concerned	
Date of birth and age of the CYP/VA	
Link church or organisation of the CYP/VA	
Names of any other people involved / witnesses who have come forward voluntarily - do not investigate	
<p>Initial report of the concern: details of what happened, AND/OR the concern AND/OR disclosure of allegations. Do not interpret information – use the same language that was used by the CYP/VA and only use open-ended questions to clarify e.g. who, what, when and how. When did the events reported take place? Are you reporting your own concerns or those reported by somebody else? How is the person feeling? What is their behaviour like right now? Are there any visible signs of injury or pain? - if yes, illustrate this on the body map. Are other children/young people/adults involved? Please use additional paper if required.</p>	

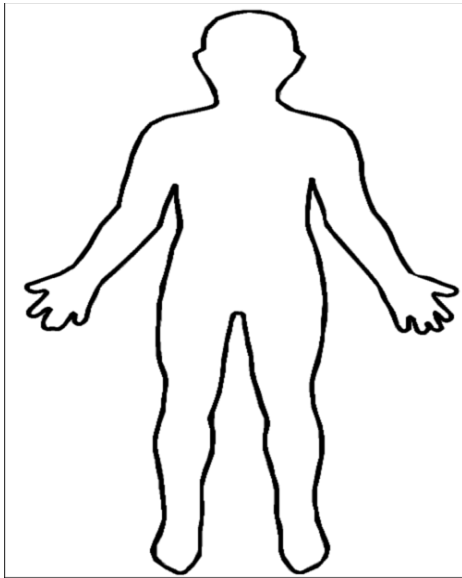
² Refer to section 3.



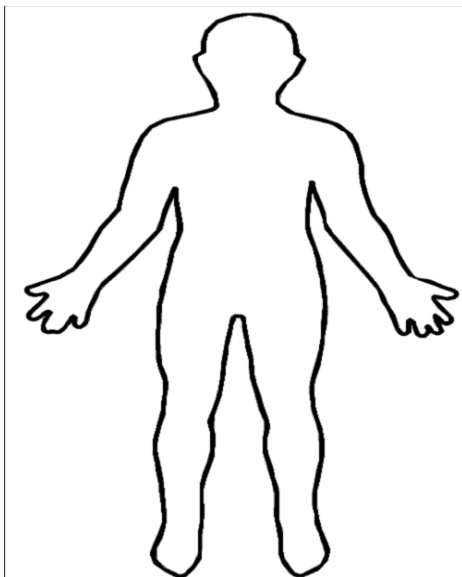
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If there are any visible signs of injury or pain, please indicate the location and shape of injury.

FRONT:



BACK:





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Additional health /developmental needs of the CYP/VA concerned	
Additional information known about the CYP/VA (any previous concerns, personal circumstances, relationships with family & friends, behavioural issues/changes...)	
Name, role and contact details of person completing this form	
Describe your response and actions following the incident/disclosure/concern. What have you done or said to the CYP/VA or agreed to do next?	
Your Name: _____	Date & Day Form Completed: _____
Your Signature: _____	Time Form Completed: _____
<p>PLEASE NOW GIVE THIS FORM TO THE DESIGNATED SAFEGUARDING LEAD AS SOON AS POSSIBLE. THANK YOU.</p>	

THE REMAINDER OF THE FORM TO BE COMPLETED BY THE DSL.	
PART 2:	To be completed by the DSL.
<p>DSL's immediate response and actions taken. Include sharing and gathering information speaking to CYP/VA, parents/carers and gauging their response. This may also include undertaking a professional consultation. Has any immediate risk assessment been carried out and if so, what?</p>	



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Information shared with parents/carers? Are they aware of the concerns/actions carried out to support/safeguard the CYP/VA? Has consent been given for this? If information has not been shared, what is the rationale for this?

--

Information shared with other staff/agencies? Who, what, how and the rationale behind this?

--

Outcome for the CYP/VA. What level of intervention is required to safeguard and promote the CYP/VA's welfare? i.e. where does this level of need fit on the Continuum of Need document?

--

Feedback given to initial concern recorder. This is to be an overview omitting any confidential information (consider a "need to know" basis).

--

DSL Name: _____	Date & Day Form Completed: _____
DSL Signature: _____	Time Form Completed: _____



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Checklist for DSL:

- ✓ CYP/VA clearly identified?
- ✓ Name, designation and signature of the person completing the record populated?
- ✓ Date, day and time of any incidents or when a concern was observed?
- ✓ Date, day and time of written record?
- ✓ If a third party has raised concerns, are details of this person included (name, relationship to the CYP/VA and their contact details if relevant)?
- ✓ Distinction between fact, opinion and hearsay?
- ✓ Concern described in sufficient detail, i.e. no further clarification necessary?
- ✓ CYP/VA's own words used? (Swear words, insults or intimate vocabulary should be written down verbatim.)
- ✓ Are the names of all parties who were involved in the incident, including any witnesses to an event, included? Is it clear what their relationship is to the CYP/VA?
- ✓ Record free of jargon?
- ✓ Written in a professional manner without stereotyping or discrimination?
- ✓ What did the recorder say or do in response to the concern?
- ✓ Record of concern completed in a timely manner?
- ✓ Record of concern passed to DSL in a timely manner?
- ✓ Record includes a completed body map (if relevant) to show any visible injuries?
- ✓ Is any additional paperwork, e.g. original notes, or handwritten notes of conversation with parents, attached securely to this record?
- ✓ Has DSL completed their sections in full, including action taken and outcome, feedback to staff/initial concern recorder and information sharing?
- ✓ If the concerns have not been referred to Children's Services/Police, are the reasons clearly recorded by the DSL?



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12. Appendix 2: Audit Form

Audit date:	Audit completed by:		
Overall 'RAG' rating (see key below):			
Action Needed	Timescale	Name & Position of Person Responsible	Date Completed

RED	Information from the checklist is lacking and deficiencies need to be addressed urgently
AMBER	Key information is included but recording could be further improved
GREEN	Recording meets the above required standards

If you intend to give a copy of the above action plan to the recorder, please ensure they are only given this page and not any pages of any completed forms that contain confidential details.