

CHILD PROTECTION AND SAFEGUARDING POLICY

1. Overriding Principles

YMCA Plymouth recognises that the welfare and safety of children, young people and *vulnerable adults is critically important and strives to provide a safe and secure environment.

**For the purposes of this policy a vulnerable adult is defined as a person who may be unable to take care of themselves or protect themselves against significant harm due to their age, illness, disability or mental health.*

YMCA Plymouth take seriously their responsibility under the Education Act 2002 and 2011 to safeguard and promote the welfare of children and young people and, in line with the Information Sharing Guidance 2008, to work together with other agencies to ensure adequate arrangements to identify, assess, and support those children and young people who are experiencing harm. We also acknowledge our responsibility under the Counter Terrorism and Security Act and Prevent Duty (2015) to protect young people and adults who could be drawn into violent extremist activity. YMCA Plymouth understands its duty in regards to the reporting procedures concerning The Female Genital Mutilation (FGM) Act 2003 as amended by the Serious Crime Act 2015.

In addition, to promote effective safeguarding for everyone, this policy also relates to all other relevant, including statutory, guidance on Safeguarding and Prevent from:

- Care and Support Statutory Guidance
<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>
- Education and Skills Conditions of Funding for Local Authorities 2021-2022 Learner welfare is set out in Conditions of Funding for Local Authorities <https://www.gov.uk/guidance/esfa-education-and-skills-agreements-2021-to-2022>
- www.gov.uk/government/publications/prevent-duty-
- Inspecting safeguarding in early years, education and skills settings', Ofsted, 2015;
www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills-from-september-2015

- 'Keeping children safe in education', Department for Education, from 1st Sep 2022 **New**
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf
- 'Working together to safeguard children', Department for Education, July 2018; www.gov.uk/government/publications/working-together-to-safeguard-children--2
- 'Positive environments where children can flourish: a guide for inspectors about physical intervention and restrictions of liberty', Ofsted, March 2018; www.gov.uk/government/publications/positive-environments-where-children-can-flourish.
- *Ofsted Education Inspection Framework and Handbook*
- *For most recent safeguarding updates please refer to **Annex B***

All children, young people and vulnerable adults, whatever their age, disability, gender (including reassignment), race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity have the right to protection from abuse in line with the Equality Act 2010.

The Association will ensure that all staff, volunteers and board members working with children, young people or vulnerable adults undertake suitable DBS clearances. Additionally, we will ensure they understand their own professional role with regards to Safeguarding, furthermore are fully competent and confident in carrying out their responsibilities and promoting children's welfare.

Key information is contained at Paragraph 11 which covers 'Understanding and Recognising signs of abuse'.

The procedure to follow in the event of an Incident can be found at Annex A and the report form is contained at Annex B

Finally, the Association aims to implement best practice with regards to Safeguarding and Child Protection. The Association has a designated safeguarding team, managed by the Lead Safeguarding Officer. The expectation of the Safeguarding Team is to ensure best practices. They have the responsibility and authority to review procedures, attend regular Safeguarding meetings (monthly and minuted) and undertake annual Safeguarding training. It is the responsibility of the Safeguarding team to

ensure that all the Associations staff receive the necessary levels of training every two years minimum (for good practice this is undertaken annually), whilst operating in a culture where Safeguarding principles are suitably promoted.

2. Purpose

The purpose of this policy is to provide children, young people and vulnerable adults with appropriate safety and protection whilst under the care of YMCA Plymouth.

It provides a framework that enables all staff, volunteers and service users to understand their responsibilities towards the safeguarding of children, young people and vulnerable adults and where applicable to report concerns to the appropriate officer.

The policy seeks to promote the safeguarding of children, young people and vulnerable adults and encourage the prevention of abuse by raising awareness through the activities and services available at the centre and promote principles of best practice within the safeguarding agenda.

3. Definitions of Abuse

YMCA Plymouth recognises that abuse can take different forms:

- **Emotional abuse:** is where repeated verbal threats, criticism, ridicule, shouting or lack of love, affection and warmth, emotionally harms a child, young person or vulnerable adult.
- **Sexual abuse:** involves any contact or interaction whereby a child, young person or vulnerable adult is used for the sexual stimulation of an older, stronger or more influential person.
- **Neglect:** is the persistent failure to meet a child, young person or vulnerable adults basic physical and/or psychological needs causing damage to their health and development.
- **Physical abuse:** is deliberately causing physical harm to a child, young person or vulnerable adult.

For more detail on the definitions of abuse see Paragraph 11.

4. Employment and Recruitment

YMCA Plymouth will ensure safe practice in the recruitment and employment of all paid staff, volunteers and board members. The Association will ensure that strict safeguarding procedures in recruitment

are in place to safeguard and promote the welfare of children, young people or vulnerable adults at every stage of the process. This is achieved by obtaining an enhanced DBS check and 2 written references for every employee who works regularly with children, young people or vulnerable adults. DBS update declarations are also required from staff every 3-years.

Finally, the recruitment team may conduct online searches as part of their due diligence during the recruitment process. The stated aim of this is that it may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.

5. Training of Staff, Volunteers and Board Members

All staff, volunteers and board members who may have regular or close contact with children, young people and vulnerable adults will be required to complete the minimum legislative safeguarding training requirements that enables them to recognise and respond to children, young people or vulnerable adults, welfare concerns and identify signs of abuse. All YMCA staff and leaders to receive regular updates on safeguarding at least annually. Designated Safeguarding Officers will be required to update their accredited training every two years.

6. Named Safeguarding Officer

The named Lead Safeguarding Officer for YMCA Plymouth is:

Tom Lavis – CEO

Designated Safeguarding Officers in YMCA Plymouth's Safeguarding Team across the association are;

Location	Name
YMCA Plymouth	Nicole Jeffery
YMCA Plymouth	Stacey Ferris
YMCA Torpoint	Karl Curtis
Board of Trustees (Link Trustee)	David Bayliss OBE

For details of the role of the Safeguarding Officers see Paragraph 12.

7. Confidentiality and information sharing

YMCA Plymouth is committed to valuing the rights of the child, young person or vulnerable adult whilst recognising the responsibility to use, hold and safeguard information received.

YMCA Plymouth is mindful that it is placed in a position of trust by all stakeholders and there is a general expectation that a professional approach will be used in all matters of confidentiality. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

Information should be stored in a secure place with limited access to designated people only (CPOMs system), in line with data protection laws (See Data Protection policy).

YMCA Plymouth is committed to promoting good practice in communication with other agencies to ensure the welfare and safeguarding of all children, young people and vulnerable adults.

YMCA Plymouth is committed to raising awareness to all staff, volunteers and users of the centre about the importance of good communication to protect children, young people and vulnerable adults. Notices will be displayed to inform children, young people and adults who the Designated Safeguarding Officers are and what they should do if they have any concerns. These arrangements will also be covered as part of all user induction sessions and annual refresher training.

Please see **ANNEX C** for more information on sharing of information.

8. Safeguarding Staff

YMCA Plymouth will ensure that effective communication between management and staff occurs to raise staff and volunteers and board member awareness of the risks.

Staff should ensure that they work in an open environment and avoid unobserved situations.

All YMCA Plymouth staff, volunteers and board members must demonstrate exemplary behaviour in order to protect themselves from false allegations.

YMCA Plymouth will ensure that all staff, volunteers and board members regularly review and evaluate their own practice against established good practice, and when necessary challenge existing practice to ensure their safety and protection against accusations of abuse.

The Association has responsibility to ensure that systems are in place to support staff and volunteers throughout any investigation process and afterwards.

YMCA Plymouth will support and protect those staff, volunteers and board members who report suspicions of abuse or concerns about their colleagues' actions.

For more details on good practice see Paragraph 13.

9. Internal enquiries and suspension

The Lead Safeguarding Officer in conjunction with the Human Resources Consultant will make a decision about whether any individual accused of abuse should be temporarily suspended pending further police and any other enquiries that might be undertaken.

Irrespective of any enquiry findings or police enquiries the YMCA disciplinary process will be followed on all individual cases to decide whether any penalty is appropriate. There might be occasions that no action is taken by the police because of lack of evidence. However, the disciplinary process is based on the balance of probabilities so internal penalties might still be appropriate. The welfare of the child, young person or vulnerable adult should remain of paramount importance throughout.

10. Other users of Association facilities

The Association provides facilities that are used regularly by other groups and clubs. The Lead Safeguarding Officer will ensure that those groups and clubs have appropriate Safeguarding policies and procedures in place.

Allegations of previous abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child or by a member of staff who is still currently working with children). Where such an allegation is made, staff, volunteers and board members should follow the procedures as detailed within this policy.

11. Understanding and Recognising Signs of Abuse

Staff are reminded that children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused.

Not all children receive the love and care they need to grow up as healthy and happy people. Some end up being hurt, neglected or abused as a result of not being treated in a safe and proper manner.

Somebody may abuse or neglect a child, young person or vulnerable adult by inflicting harm or by failing to prevent harm.

Children, young people or vulnerable adults may be abused in a family or in an institutional or community setting, by telephone or on the internet. Abuse can be carried out by people known to the child, young person or vulnerable adult as well as strangers. It is necessary to be alert to the signs of the possibilities of abuse and the responsibility to consult and discuss those concerns.

It can be difficult to recognise abuse and the signs listed in these guidelines are only indicators and many can have reasonable explanations.

Abuse is defined in four categories;

Physical Abuse

Physical abuse is deliberately causing physical harm to a child, young person or vulnerable adult. This might involve punching, kicking, biting, burning, shaking, throwing or beating with objects. Using belts, whips, sticks or other similar objects as a form of administering discipline is also physical abuse. Further physical abuse can include misuse of medication, restraint, drowning or suffocation. It is against the law to discipline a child, young person or vulnerable adult by doing any of these things.

Symptoms that indicate physical abuse can include:

- Bruising in unusual places, such as the face or the back
- Finger mark bruising or grasp marks particularly on the limbs or chest in a child
- Bites
- Burn and scald marks, small round burns that could have been caused by a cigarette
- Fractures to arms, legs or ribs in a child
- Large numbers of scars of different sizes or ages

Emotional Abuse

Emotional abuse can be much more difficult to detect than physical abuse because there are usually no physical signs. It can include intimidation, verbal abuse or conveying that they are worthless, unloved, inadequate or valued only if they meet the needs of another person. Emotional abuse can also include constantly belittling or comparing them unfavourably to others. It may involve causing a child, young person or vulnerable adult to feel frightened or in danger. It can also result from being prevented from social contact with others. Children, young people and vulnerable adults who are living with domestic violence are also affected by the atmosphere of fear and violence within the home.

Symptoms that can indicate emotional abuse include:

- Children being excessively clingy
- Attention seeking behaviour
- Very low self-esteem or excessive self-criticism
- Excessively withdrawn behaviour or fearfulness
- Anxious behaviour such as rocking and/or hair twisting
- Self-harming
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders

Sexual Abuse / Harrassment

Sexual Harassment - If someone behaves in a way which makes you feel distressed, intimidated or offended and the behaviour is of a sexual nature, this is called sexual harassment.

Sexual harassment = unwanted conduct of a sexual nature for adults.

This is sexual ABUSE for anyone under 18, or over 18 who meets the adult safeguarding threshold"

Sexual abuse may involve direct or indirect sexual exploitation, harassment or corruption of children, young people or vulnerable adults by involving them in inappropriate sexual activities. It includes any touching, stimulating, rubbing or patting that is meant to arouse sexual pleasure in the offender. Sexual abuse can also involve sexual contact between a significantly older and younger child. In addition, it includes exposing children to pornography and unsuitable videos and images; i.e. on the internet. Under the Sexual Offences Act 2003 any sexual activity – contact or non-contact – with a child under the age of 18 is a crime.

Symptoms of sexual abuse include:

- Allegations or disclosure
- Genital soreness, injuries or discomfort
- Sexually transmitted infections; urinary tract infections
- Excessive preoccupation with sex; inappropriately sexualised play, words or drawings
- A child who is sexually provocative or seductive with adults

Older children and/or young people or vulnerable adults may additionally exhibit:

- Depression
- Drug and/or alcohol misuse
- Eating disorders
- Obsessive behaviours
- Self-harm/mutilation, suicide attempts
- School/peer relationship problems and difficulties

Neglect

Neglect is the persistent failure to meet a child's, young persons or vulnerable adult's basic physical and/or psychological needs causing damage to their health and development. It may involve a parent or carer failing to provide adequate food, heat shelter or clothing, failure to protect from harm or danger, or failing to access adequate medical care and treatment when necessary. It can exist in isolation or in combination with other forms of abuse.

Symptoms of neglect can include:

- Inadequate supervision of children
- Lack of stimulation, social contact or education
- Inadequate responses to emotional needs
- Inadequate nutrition, leading to ill health
- Constant hunger; stealing or gorging food
- Failure to seek or follow medical advice
- Repeated wearing of inappropriate clothing for the weather

12. Designated Safeguarding Officers Role & Terms of Reference

Within YMCA Plymouth the Designated Safeguarding Officers will:

- Maintain a high profile as the recognised point of contact freely available to all staff, volunteers, board members and members of the public wishing to raise concerns or seek help and guidance on any questions connected with YMCA Plymouth safeguarding policies and procedures;
- Ensure safeguarding is a standing agenda item in all departmental & leadership meetings, ensuring there's a regular culture of continued safeguarding discussions and sharing of good practice
- Will share good practices, update on current Child Protection concerns, or close previous Safeguarding investigations.
- Develop and maintain links with the relevant statutory authorities;
- Representing the key link to statutory agencies (Social Care or Police);
- Implement and promote the Child Protection policy and procedures;
- Ensuring all staff and volunteers are familiar with, and adhere to the YMCA Plymouth's Safeguarding Policy;
- Regularly report to the YMCA Plymouth Board of Trustees;

- Support and raise awareness of the protection of children, young people and vulnerable adults;
- Communicate with staff and volunteers on issues of Safeguarding & Child Protection;
- Keep abreast of developments and understand the latest information on data protection, confidentiality and other legal issues that impact upon the protection of children, young people and vulnerable adults;
- Keeping an up-to-date knowledge and understanding of the area of child protection, including attending appropriate training – as deemed suitable by the Plymouth Safeguarding Board (See Safeguarding Team Training Matrix available on Google Drive);
- Encourage good practice and support of procedures to protect children and young people;
- Maintain confidential records of reported cases and action taken and liaise with statutory agencies and ensure they have access to all necessary information;
- Organise ongoing training for staff, volunteers and board members on a two-year refresher basis;
- Be available out of hours;
- Ensure that when on leave or absent from work for any significant period that the role of Designated Safeguarding Officer is suitably covered by another member of staff.

13. Good practice

Abuse can occur within many situations including the home, school, children's centre, learning and sporting environments. Some individuals will actively seek employment or voluntary work with children, young people and vulnerable adults in order to harm them. A coach, instructor, teacher, official or volunteer will have regular contact with children, young people and vulnerable adults and be an important link in identifying cases where they need protection. All suspicious cases of poor practice must be reported following the guidelines in this policy document.

Good practice means:

- Treating all children, young people and vulnerable adults equally with respect and dignity.

- Always putting the welfare of children, young people and vulnerable adults first.
- Keeping a written record of any injury that occurs, along with the details of any treatment given.
- Displaying the name and contact details of the Designated Safeguarding Officers in places accessible to all children, young people and adults so that they are aware of who to talk to if there are any concerns.
- Contributing to a culture of openness, where everyone (including children and young people) feels free to share their views and concerns.
- Avoiding being left alone with a child, young person or vulnerable adult where you cannot be observed by others.
- Being aware of your language, tone of voice and where you put your body.
- Not letting children, young people or adults involve you in excessive attention seeking that is overtly sexual or physical in nature.

You should not engage in any of the following:

- engage in rough physical or sexually provocative games
- allow or engage in any form of inappropriate touching
- allow children to use inappropriate language unchallenged
- make sexually suggestive comments to a child, young person or adult even in fun
- reduce a child to tears as a form of control
- allow allegations made by a child, young person or vulnerable adult to go unchallenged, unrecorded or not acted upon.

NB: It may sometimes be necessary for staff or volunteers to do things of a personal nature for children, young person or vulnerable adult, particularly if they are young, or are disabled. These tasks should only be carried out with the full understanding and consent of parents and the players involved. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

14. Female Genital Mutilation (FGM)

The UK Government has written advice and guidance on FGM that states; "FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practiced on a child it is a violation of the child's right to life, their right to their bodily integrity, as well as their right to health. The UK Government has signed a number of international human rights laws against FGM, including the Convention on the Rights of the Child." "FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practiced on a child it is a violation of the child's right to life, their right to their bodily integrity, as well as their right to health. The UK Government has signed a number of international human rights laws against FGM, including the Convention on the Rights of the Child." "Girls are at particular risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM.

UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women."

In order to protect our children it is important that key information is known by all of the school community.

Indications that FGM has taken place:

- Prolonged absence from school with noticeable behaviour change – especially after a return from holiday.
- Spend long periods of time away from the class during the day.
- A child who has undergone FGM should be seen as a child protection issue. Medical assessment and therapeutic services to be considered at the Strategy Meeting.

Indications that a child is at risk of FGM:

- The family comes from a community that is known to practice FGM – especially if there are elderly women present.
- In conversation a child may talk about FGM.
- A child may express anxiety about a special ceremony.
- The child may talk or have anxieties about forthcoming holidays to their country of origin.
- Parent/Guardian requests permission for authorised absence for overseas travel or you are aware that absence is required for vaccinations.
- If a woman has already undergone FGM – and it comes to the attention of any professional, consideration needs to be given to any Child Protection implications e.g. for younger siblings, extended

family members and a referral made to Social Care or the Police if appropriate.

If we have concerns that children in our business community are at risk or victims of Female Genital Mutilation then this should be discussed with the Designated Safeguarding Officer immediately who will seek and give further advice. We may;

ASK

Ask children to tell you about their holiday. Sensitive and informally ask the family about their planned extended holiday ask questions like;

- Who is going on the holiday with the child?
- How long they plan to go for and is there a special celebration planned?
- Where are they going?
- Are they aware that the school cannot keep their child on roll if they are away for a long period?
- Are they aware that FGM including Sunna is illegal in the U.K even if performed abroad?

If you suspect that a child is a victim of FGM you may ask the child;

- Your family is originally from a country where girls or women are circumcised – Do you think you have gone through this?
- Has anything been done to you down there or on your bottom?
- Do you want to talk to someone who will understand you better?
- Would you like support in contacting other agencies for support, help or advice?

These questions and advice are guidance and each case should be dealt with sensitively and considered individually and independently. Using this guidance is at the discretion of the Designated Safeguarding Officer.

RECORD

All interventions should be accurately recorded.

REFER

The Designated Safeguarding Officer needs to seek advice about making referrals from the relevant Social Services Department.

15. PREVENTION OF RADICALISATION AND EXTREMISM

a. Introduction and Context

Prevent is part of a Government initiative to develop a robust counter terrorism programme – CONTEST. The UK faces a range of terrorist

threats. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause. The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

1. **Critical** - an attack is expected imminently
2. **Severe** – an attack is highly likely
3. **Substantial** – an attack is a strong possibility
4. **Moderate** – an attack is possible but not likely
5. **Low** – an attack is unlikely

The current threat level from international terrorism in the UK is substantial which means that a terrorist attack is a strong possibility.

Educational establishments are major education and training providers for the 16 – 25 year age group, particularly young people from ethnically diverse, and socially & economically disadvantaged areas. The age and profile of our students and young people make it crucial to be involved in the Prevent strategy. We have a part to play in fostering shared values and promoting cohesion. We should focus on the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within training settings. This strategy has five key objectives:

1. To promote and reinforce shared values; to create space for free and open debate; and to listen and support the learner voice.
2. To break down segregation among different student communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all students in playing a full and active role in wider engagement in society
3. To ensure the safety of young people and that the establishment is free from bullying, harassment and discrimination
4. To provide support for all our young people who may be at risk and appropriate sources of advice and guidance

5. To ensure that all our young people and staff are aware of their roles and responsibilities in preventing violent extremism.

In order to achieve these objectives the strategy will concentrate on four areas;

b. Leadership and Values

To provide an ethos which upholds core values of shared responsibility and wellbeing for all our young people, staff and visitors and promotes respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation
- Building staff and young people's understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies

c. Teaching and Learning

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of young people, by undermining extremist ideology and supporting the learner voice. This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion
- Promoting wider skill development such as social and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights through our 'Engaging young people Building Resilience Project' funded by the Home Office.
- Encouraging active citizenship/participation and learner voice.

d. Support for Young People

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. This will be achieved through:

- Establishing strong and effective support services
- Listening to what is happening in all our activities and the community

- Implementing anti-bullying strategies and challenging discriminatory behaviour
- Helping all young people and staff know how to access support in the Association and or through community partners
- Providing an environment where our young people are able to voice any concerns. This can be through student council meetings, annual student voice questionnaires and confidential one to one sessions with Tutors and Leaders
- Supporting at risk young people through safeguarding and crime prevention processes
- Focussing on narrowing the attainment gap for all young people

e. Managing Risks and Responding to Events

To ensure that the Association monitors risks and is ready to deal appropriately with issues which arise. It will do this through:

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the Association
- Understanding and managing potential risks within the Association and from external influences
- Responding appropriately to events in local, national or international news that may impact on students and communities
- Ensuring measures are in place to minimise the potential for acts of violent extremist within the Association i.e. 'Engaging Young People, Building Resilience 'Prevent' funded Project.
- Ensuring plans are in place to respond appropriately to a threat or incident within the Association
- Developing effective ICT security and responsible user policies
- Staff Training – staff will be given training to understand radicalisation, recognise the signs and what to do
- Safer recruitment – ensure staff we appoint are suitable and that our recruitment procedures are rigorous
- Monitoring visitors to the Association
- Ensuring 'No platform for extremists' – ensuring we do not hire our premises to individuals or organisations that are extremist in their views
- Looking for signs of vulnerability. Signs are;
 - Underachievement
 - Being in possession of extremist literature
 - Poverty
 - Social exclusion
 - Traumatic events
 - Global or national events
 - Religious conversion
 - Change in behaviour
 - Extremist influences

- Conflict with family over lifestyle
- Confused identity
- Victim or witness to race or hate crimes
- Rejection by peers, family, social groups or faith
- Recognising extremism- early indicators are
 - Showing sympathy for extremist causes
 - Glorifying violence, especially to other faiths or cultures
 - Making remarks or comments about being at extremist events or rallies outside school
 - Evidence of possessing illegal or extremist literature
 - Advocating messages similar to illegal organisations or other extremist groups
 - Out of character changes in dress, behaviour and peer relationships (but there are also powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent)
 - Secretive behaviour
 - Online searches or extremist messages or social profiles
 - Intolerance of difference, including faith, culture, gender, race or sexuality
 - Graffiti, art work or writing that displays extremist themes
 - Attempts to impose extremist views or practices on others
 - Verbalising anti-western or anti British views
 - Advocating violence towards others
- Having a referral process – ensuring staff and visitors with concerns know who the Designated Safeguarding Officers are
- Monitoring and reviewing – reviewing this policy annually to ensure it is fit for purpose.

The Department for Education has a dedicated telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly, or in non-emergency situations, they can be e mailed at:

Radicalisation risks related to the impact of COVID-19?

There are three further radicalisation risks YMCA staff must make young people aware of during this pandemic:

- ***Exposed to misleading and hateful content:*** Young people may have been exposed to fake stories or conspiracy theories about COVID-19, which attribute blame to minority groups.

- **Engaged with extremist individuals:** Young people may have become exposed to, or engaged with, extremist organisations or individuals, especially online.
- **Increased vulnerability to radicalisation:** COVID-19 may have increased vulnerability to radicalisation as children and young people may feel isolated, anxious, frustrated and angry. This could increase the resonance of intolerant messaging and the appeal of extremist groups or individuals offering explanations for the crisis.

Example extremist themes during the pandemic for YMCA staff to be mindful of?

During the COVID-19 pandemic, false and misleading narratives about the virus have been spread, particularly online, often to place blame on 'out-groups' and minorities. This can further incite hatred, justify violence and divide communities. While some of this occurs on popular social media platforms, it can also be found on lesser known, unregulated platforms. These sites can include easily available extreme and conspiratorial content.

The Commission for Countering-Extremism (CCE) have highlighted numerous examples of prominent extremist narratives, for example – conspiracies blaming the Jewish community for spreading the virus or suggesting COVID-19 is a 'Jewish plot', claims that British Muslims have flouted social distancing rules and spread COVID-19 and narratives promoting Anti-Chinese hatred.

As a result, all YMCA staff have been informed and British values and Prevent training was updated and will be shared annually with students during PSHE sessions

16. Online Learning / Distance Learning

This section was constructed following the guidance of The South West Grid for Learning Trust, which is an educational trust with an international reputation for supporting schools with online safety.

This online safety policy has been developed by a working group/committee made up of:

- CEO (Lead Safeguarding Officer) and SLT
- Safeguarding Team
- Safeguarding Trustee
- HR Consultant

Discovery College / YMCA Plymouth will regularly monitor the impact of the policy using:

- Logs of reported incidents (Via CPOMs)
- Monitoring logs of Google logs (Drive / Hangouts / Classroom)

Scope of the Policy

This policy applies to all members of the Discovery College / YMCA Plymouth (including staff, students/pupils, volunteers, parents/carers, visitors, community users) who have access to and are users of college digital technology systems, both in and out of the college.

The Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of students/pupils when they are off the college site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of online-bullying or other online safety incidents covered by this policy, which may take place outside of the college, but is linked to membership of Discovery College / YMCA Plymouth. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data (see appendix for template policy). In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

Online Safety Lead

The Lead Safeguarding Officer (LSO) will also take the lead for online safety and it will be his/her responsibility to:

- take day to day responsibility for online safety issues and has a leading role in establishing and reviewing the college online safety policies/documents
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provide training and advice for staff
- liaise with the Local Authority / relevant bodies
- liaise with Discovery College / YMCA Plymouth technical staff
- receives reports of online safety incidents and creates a log of incidents (Utilising CPOMs) to inform future online safety developments.
- meet regularly with safeguarding team to discuss current issues, review incident logs and filtering/change control logs
- attend relevant meetings with Trustees and keeps them fully briefed as appropriate
- report regularly to Senior Leadership Team

Students / Pupils

The education of staff and students in online safety/digital literacy is therefore an essential part of the Discovery College / YMCA Plymouth's online safety provision. Children and young people need the help and support of the college to recognise and avoid online safety risks and build their resilience.

Online safety should focus on:

- Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial/pastoral activities
- Students/pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Students/pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Students/pupils should be helped to understand the need for the student/pupil acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school/academy.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that students/pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where students/pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

Staff

It is essential that all staff receive online safety training and understand their responsibilities, as outlined in this policy:

- Staff should be supportive throughout distance learning interactions and willingly guide students through new technology processes / software
- Conduct themselves in a professional manner as you'd expect from a teacher / TA / staff member
- Undertake online safety training (Annually - EduCare). This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.
- Ensuring staff fully understand the Discovery College / YMCA Plymouth online safety policy and acceptable use agreements.
- Staff take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse
- where personal data is stored or transferred on mobile or other devices (including USBs) these must be encrypted and password protected.
- will not transfer any school/academy personal data to personal devices except as in line with school policy
- Use distance learning resources professionally and in the same regard as classroom-based teaching (i.e. via Google Hangouts / Classroom)

Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see "User Actions" above).

If there is any suspicion that the web site(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the Flowchart (below and appendix) for responding to online safety incidents and report immediately to the police.

17. Informing ESFA about serious safeguarding incidents

Informing ESFA about serious safeguarding incidents

ESFA has included new safeguarding clauses in the funding agreements and contracts. Whilst the local authority and the institution have primary duties in respect of safeguarding, the Secretary of State (SoS) has a general duty to promote the wellbeing of children in England under section 7 of the Children and Young Persons Act 2008. ESFA's role therefore, is to provide assurance to

the SoS, in meeting her general duty, that the right organisations are taking action to keep all pupils and students safe.

For this reason, ESFA want to be made aware when an institution is itself the subject of an investigation by the local authority or the police. ESFA does not require details of all the safeguarding incidents an institution reports to the local authority or to the police, only where the institution itself, or one of its subcontractors, is subject to investigation. In such circumstances, ESFA requires the Chair or Chief Executive of the institution (or senior designated safeguarding lead) to email Enquiries.EFA@education.gov.uk.

ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be investigated by the local authority and/or the police.

The circumstances in which ESFA funded providers should inform ESFA of safeguarding referrals/concerns

The main issues/referrals ESFA want to be notified about, where any funded students are concerned, are those that result in police investigations. ESFA needs to be sighted on these cases and satisfied the right action is in hand by responsible bodies.

How ESFA expect to be informed and level of information required

Please email Enquiries.EFA@education.gov.uk. ESFA will need to know the name of the institution, the nature of the safeguarding incident and confirmation that it is under investigation by the police. ESFA will not ask for, or require any information that could be used to identify individuals or any information that will impact on your data protection duties.

What ESFA will do with the information provided

Once ESFA has been alerted that a serious safeguarding incident has taken place at an ESFA funded institution, ESFA will ensure the SoS is made aware. ESFA will then liaise with the organisations that have the primary duty. ESFA will take the action they deem necessary in accordance with the funding agreement.

The guidance can be accessed through the link below:

https://www.gov.uk/guidance/16-to-19-education-funding-guidance?utm_source=EFA%20e-bulletin&utm_medium=email&utm_campaign=e-bulletin&mxmroi=2305-12782-98111-0#informing-esfa-about-serious-safeguarding-incidents

18. References

This policy statement has been written with particular reference to the following legislation:-

- The Children Act 1989
- The Children Act 2004
- Every Child Matters, Change for Children 2004
- Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Public Interest Disclosure Act 1988
- DfE's Keeping Children Safe in education (whole Doc)

In addition to the above legislation guidance and advice has been sought from the following documents: -

- Plymouth Safeguarding Children Board Inter-Agency Training Literature
- Local Safeguarding Children's Board Guidance
- YMCA England Child Protection Guidelines
- Working together to Safeguard Children 2015
- The Protection of Children in England – A Progress Report – Lord Laming 2009
- Surestart Children's Centres – Practice and Guidance
- Surestart Children's Centres – Statutory Guidance
- Statutory framework for the Early Years Foundation Stage
- Safeguarding Children and Safer Recruitment in Education
- Plymouth City Council Guidance –What to do if you're worried a child is being abused
- Ofsted Guidance

ANNEX A

SAFEGUARDING POLICY

SAFEGUARDING PROCEDURE

Procedure to follow if abuse is disclosed, discovered or suspected

Staff are reminded at this point that children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused.

Therefore, responding appropriately to suspicions of abuse is important. If you receive a disclosure, allegation or suspect abuse you should:

- Act promptly
- Discuss your concerns immediately with the Designated Safeguarding Officer for your department
- If your Designated Safeguarding Officer is unavailable, you should discuss your concerns with any of the other Designated Safeguarding Officers, or the Lead Safeguarding Officer
- If the concern arises out of hours you should contact Tom Lavis Lead Safeguarding Officer on: **07912349499**
- If you have serious suspicions or concerns and are unable to contact anyone you should always take action by contacting:
 - The Plymouth Multi-Agency Hub by telephoning:
 - 01752 **305200** (during working hours), or;
 - 01752 **346984 (out of hours)**.
 - Alternatively, contact via the following email address:
multiagencyhub@plymouth.gcsx.gov.uk

If someone discloses to you:

- Stay calm, avoid showing you are shocked or appalled
- Look at the child, young person or vulnerable adult directly
- Accept what the child, young person or vulnerable adult says
- Do not press for information

- Be aware that the child, young person or vulnerable adult may have been threatened
- Tell the child, young person or vulnerable adult that they are not to blame
- Reassure the child, young person or vulnerable adult that they are right to tell and that you believe them
- If appropriate seek the child's, young persons or adult's permission to share your concern with the Designated Safeguarding Officer. In some circumstances you may need to explain that you are legally bound to do so. If you are concerned about possible abuse in a young child, it may be appropriate to share your concern with the parent. However, you should not do this if you consider this might put the child at further risk.
- Let them know what you are going to do next, who you are going to tell and why.
- As soon as possible afterwards record full details of the discussion with the young person or vulnerable adult via the CPOMS system.
- CPOMS automatically informs the Designated Safeguarding Officer and relevant Safeguarding Leads who will, if suitable, contact the appropriate Advice and Assessment team/police.

Searching, screening and confiscation at School

Staff may lawfully search electronic devices, without consent or parental permission, if there is a suspicion that the pupil has a device prohibited by school rules, or the staff member has good reason to suspect the device may be used to:

- Cause harm,
- Disrupt teaching,
- Break school rules,
- Commit an offence,
- Cause personal injury, or
- Damage property.

Any data, files or images that are believed to be illegal must be passed the Police as soon as practicable, including pornographic images of children, without deleting them. Any data, files or images that are not believed to be unlawful, may be deleted or kept as evidence of a breach of the school's behaviour policy.

What happens next?

The process of professional involvement in cases of sexual abuse of a child, young person or vulnerable adult will usually follow this course:

- A strategy discussion involving Advice and Assessment, Police Safeguarding Team, other significant professionals and the person suspecting abuse or to whom the child, young person or vulnerable adult spoke.
- A decision will be taken as to whether an investigation is warranted. If so, it will then be planned.
- The investigation may include:-
 - An informal talk with the child, young person or vulnerable adult.
 - A formal police recorded interview following disclosure.
 - A medical examination.
 - Preliminary assessment.
- If there is sufficient concern, a Child Protection Conference or similar meeting will be held to decide the best course of action to protect the child, young person or vulnerable adult and help the family.
- There may be criminal prosecution of the abuser.

Where there is a complaint against a member of staff there may be three types of investigation:

- a criminal investigation;
- a child protection investigation;
- a disciplinary or misconduct investigation.

The results of the police and child protection investigation may well influence the disciplinary investigation, but not necessarily.

If, following consideration, the allegation is clearly about poor practice this will be dealt with as a misconduct issue.

ANNEX B – Most recent updates

Sept 2022

1. Updates to Keeping Children Safe in Education effective September 2022

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping children safe in education 2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf)

Part 1

Disclosure

- Staff are reminded that children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused.

Domestic Abuse

- New information has been added to explain the impact of domestic abuse including the potential short-term and long-term detrimental impact on children's health, wellbeing, and ability to learn if they are experiencing domestic abuse at home or within their own intimate relationships.

Part2

Supporting the DSL

- The importance that governors and proprietors properly support the DSL role has been given prominence by adding it to the main body of the guidance and includes an expectation that they should read the full DSL job description in Annex C.

Safeguarding Training

- There is a new requirement for governors and trustees to receive safeguarding training at the point of induction to ensure their understanding of their important strategic role, as well as their legislative responsibilities, and those set out by their local multi-agency safeguarding arrangements, and that this is regularly updated.

Online Safety

- In relation to online safety, there is an expectation that the governors hold this as a central theme in their whole setting approach to safeguarding.

Effective Safeguarding Curriculum

- A focus on preventative education has been added, with a new paragraph about the importance of the setting's role in delivering an effective safeguarding curriculum.

LGBTQ+ Children and Young People

- There is a greater emphasis on risks for LGBTQ+ children and/or those that are perceived to be. Staff are reminded that

LGBTQ+ inclusion is part of the statutory relationships education/relationships and sex education curriculum.

Part 3

Curriculum Vitae and Full Application Forms

- Regarding safer recruitment, the guidance clarifies that a curriculum vitae (CV) should only be accepted alongside a full application form. CVs on their own will not contain all the information required to support safer recruitment.

Online Searches during the Recruitment Process

- The guidance now states that education settings should consider conducting online searches as part of their due diligence during the recruitment process. The stated aim of this is that it “may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at the interview.

Part 4

Lessons Learned from all Allegations

- Learning from all allegations against staff investigations should be incorporated by schools and colleges, not just from those that are concluded and substantiated.

Low-Level Concerns

- The guidance now makes clear that schools and colleges can choose to whom low-level concerns about staff are reported to, so long as it is clear in their policies. All staff should be aware of how to handle low-level concerns, allegations against staff and whistleblowing, with KCSIE 2022 being clear that this information should be contained in the staff behaviour policy (also known as the code of conduct)

Part 5

Child-on-Child Abuse

- Terminology throughout KCSIE 2022 has changed from peer-on-peer abuse to child-on-child abuse. This is a welcome change as the term peer-on-peer abuse suggests the abuse is between children of a similar age which is not always the case.

Preventative Education

- Senior leaders are reminded of the crucial part education settings play in preventative education within the context of a whole-school or college approach that creates a culture that does not tolerate any form of prejudice or discrimination, including sexism and misogyny/misandry. The expectation is that schools/colleges’ values and standards in this area will be underpinned by their behaviour policy, pastoral support system, as well as a planned programme of evidence-based RSHE. The guidance spells out key areas to be included in the latter

Sept 2021

2. Updates to Keeping Children Safe in Education effective September 2021

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

- Partners are required to provide a self-declaration confirming all staff on contract have read & understood
- Board members are required to complete a self-declaration confirming they have read & understood (Annual Google Form sent to YMCA Stakeholders)

July 2021

Revised the new low-level concerns in part 4, section 2 to better align with paragraph 74 "What school and college staff should do if they have safeguarding concerns about another staff member".

18 January 2021

Updated 'Keeping children safe in education - for schools and colleges' to reflect legal changes following EU exit, including guidance on checking the past conduct of individuals who have lived or worked overseas.

2020 Updates

- **Online safety and online learning** – this notes the need to be vigilant regarding home learning online and links to information about safeguarding and remote education. (KCSIE para 94 and page 105)
- **Mental health** – the document now gives equal weight to mental and physical health; notes any diagnosis should be by a trained professional; notes the need to support traumatic experiences and references the Mental Health in Schools Guidance. (KCSIE paras 34,35,36, 115)
- **Whole school safeguarding culture** – there is now the wording including 'all staff' in the understanding of contextual safeguarding. Child sexual exploitation and child criminal exploitation definitions are now included in Annex A. Relationships, Sex Education and Health are referenced for their statutory nature and there is a link to 'Rise Above' from Public Health England (KCSIE para 94). The definition of Child-on-Child Abuse abuse has been expanded, including up-skirting. Annex A also expands on types of abuse with more information about domestic abuse and children as witnesses. It notes a link to Operation Encompass. Also, in Annex A, is a definition of terrorism and reference to the Voyeurism Act.
- **Children with a social worker** - the need to pay particular attention to children with a social worker is noted in paragraphs 110 and 111.

- **Responses to allegations** – this now includes supply teachers and that the school should take the lead in any investigation of an allegation concerning a supply teacher. There is also an extra consideration regarding allegations against any staff; this cites behaviour that does or may indicate a person may not be suitable to work with children, for example: something that has happened beyond school, domestic abuse being a possibility. (KCSIE paras 211-216)
- **The role of the DSL** – the DSL is noted as being expected to 'help promote' the attainment and progress of the cohort of vulnerable children, including those with a social worker. DSLs are noted as being expected to have the time, resources and funding to undertake their role but supervision is not mentioned. A link is provided to the document: 'When to Call the Police; Child Centred Policy'. (KCSIE para 97 and page 100)

ANNEX C – Information sharing

The seven golden rules to sharing information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing

it, is shared only with those individuals who need to have it, is accurate and upto-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose

For more detailed information on sharing information please refer to:

Information sharing

Advice for practitioners providing safeguarding services to children, young people, parents and carers

HM Government publication – July 2018