

Safeguarding Children, Young People & Vulnerable Adults Policy

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Safeguarding children is:

“the action we take to promote the welfare of children and protect them from harm – this is everyone’s responsibility. Everyone who comes into contact with children and families has a role to play”

Working together to Safeguard Children DfE 2018

The government defines Child Protection as:

“a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or likely to suffer, significant harm”

Working together to Safeguard Children DfE 2018

Safeguarding Vulnerable Adults is: *defined as protecting an adult’s right to live in safety free from abuse and neglect. Adult safeguarding is about preventing and responding to concerns of abuse or harm or neglect of adults.*

Effective Safeguarding Working together to Safeguard Children 2018

1. Safeguarding is everyone’s responsibility; for services to be effective each professional and organisation should play their part.
2. A child-centred approach; for services to be effective they should be based on a clear understanding of the needs and views of children.

2. Policy Statement

Snow Camp has a duty of care to safeguard all children, young people and vulnerable adults involved in *Snow Camp* from harm. They all have a right to protection and *Snow Camp* will ensure the safety and protection of all children involved in *Snow Camp* through adherence to the Safeguarding Children, Young People & Vulnerable Adults guidelines adopted by *Snow Camp*.

A child is defined as a person under the age of 18 (The Children Act 1989)

3. Policy aims

The aim of the *Snow Camp* Safeguarding Children, Young People & Vulnerable Adults Policy is to promote good practice and to create a Safeguarding Culture within the organisation:

- Providing children and young people with appropriate safety and protection whilst in the care of the *Snow Camp*.
- Allow all staff/counsellors/volunteers to make informed and confident responses to specific child protection issues.
- Staff are respectful to all employees as well as children.
- Staff are encouraged to be open about discussing good and poor practice.
- Blame only occurs in extreme circumstances.
- Directors and Managers model appropriate behaviours.
- Children are listened to.

- Staff are empowered to challenge poor practice. E.g through team meetings, staff one to ones and reflective practice meetings.
- Youth Workers and Social Workers are encouraged to be involved and are welcomed into the setting.
- Whistle blowing procedures are in place and staff/volunteers/counsellors know how to use them.

Introduction: Snow Camp make provision for children, young people & vulnerable adults to ensure that:

- The welfare of the child is paramount.
- All children, whatever their age, culture, disability, gender, language, racial origin religious beliefs and/or sexual identity have the right to protection from abuse.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- All staff should be aware of their responsibility towards vulnerable adults and to contribute to preventing further abuse if they are made aware of it.
- Staff should work together in partnership with vulnerable adults so that they are:
 - Safe and able to protect themselves from abuse and neglect.
 - Treated fairly with dignity and respect.
 - Protected when they need to be.
 - Able to easily get the support, protection and services they need.
- All staff (whether permanent, fixed-term, temporary, freelance or volunteer) working at Snow Camp have a responsibility to report concerns to the appropriate Lead Safeguarding persons.

4. Legislation

Children's Act 1989 Currently provides the legislative framework for child protection in England. Key principles established by the act include: the paramount nature of the child's welfare.

Children's Act 2004 after Victoria Climbié inquiry. Section 11 places a statutory duty on key people and bodies to make arrangements to safeguard and promote the welfare of children and partnership working.

Equality Act 2010 Which puts a responsibility on public authorities to have due regard to the need to eliminate discrimination and promote equality of opportunity.

The United Nations Conventions on the Rights of the Child (UNCRC) This is an international agreement that protects the rights of children and provides a child centred framework for the development of services to children. The UK Government ratified the UNCRC in 1991 and, by doing so, recognises children's rights to expression and receiving information.

Care Act 2014 – Safeguarding is defined as protecting an adults right to live in safety. There is a focus on people and organisations working together to prevent and stop the risks and experience of abuse and neglect. Safeguarding should promote an adults wellbeing and where appropriate have regards to their views, wishes, feelings and beliefs when deciding on any action. <https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

10 categories in the Care Act 2014 identify the following types of abuse:

1. Physical abuse
2. Domestic violence or abuse
3. Sexual abuse
4. Psychological or emotional abuse
5. Financial or material abuse
6. Modern slavery
7. Discriminatory abuse
8. Organisational or institutional abuse
9. Neglect or acts of omission
10. Self-neglect

6 key principles of Care Act 2014

1. Empowerment–give choice & control on decisions & let people know what’s going on.
2. Accountability – roles and responsibilities must be clear so people can see and check how safeguarding is done.
3. Prevention –it’s better to take action before harm occurs.
4. Partnership-work in partnership with each other and local communities.
5. Proportionality – make responses that are appropriate to the risk presented.
6. Protection – know what to do if there are concerns and how to offer people support.

Mental Capacity Act 2005- This protects and empowers people who may lack mental capacity to make their own decisions about their care and treatment. Its general principle is that everybody has capacity unless it is proved otherwise, that they should be supported to make their own decisions, that anything done for or on behalf of people without capacity must be in their best interests and should be the least restrictive intervention.

Care and Support Statutory Guidance (revised October 2018): Guidance on safeguarding vulnerable adults. <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-supportstatutory-guidance>

*This guidance is the adult equivalent of Working Together to Safeguard Children (Department for Education, 2018) for those seeking to support and protect adults at risk.

5. Promoting good practice

Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about the appropriate action to take.

Abuse can occur within many situations including the home, school and the sporting environment. Some individuals will actively seek employment or voluntary work with young people in order to harm them.

Staff or volunteers will have regular contact with child, young people or vulnerable adults and be an important link in identifying cases where they need protection. All suspicious cases of poor practice should be reported following the guidelines in this document.

When a child, young person or vulnerable adult enters the organisation having been subjected to child abuse outside the environment, sport can play a crucial role in improving the child's self-esteem. In such instances the organisation must work with the appropriate agencies to ensure the child receives the required support.

Good practice guidelines

All personnel should be encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations. The following are common sense examples of how to create a positive culture and climate.

Good practice means:

- Always working in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- Treating all children, young people or vulnerable adults equally, and with respect and dignity.
- Always putting the welfare of each child, young person or vulnerable adult first, before winning or achieving goals.
- Maintaining a safe and appropriate distance with children, young people or vulnerable adults (e.g. it is not appropriate for staff or volunteers to have an intimate relationship with a child, young person or vulnerable adult or to share a room with them).
- Building balanced relationships based on mutual trust which empowers children, young people or vulnerable adults to share in the decision-making process.
- Making sport fun, enjoyable and promoting fair play.
- Keeping up to date with technical skills & qualifications.
- Ensuring that on residential, staff must not enter a child, young person or vulnerable adults room without another staff member with them or invite children into their rooms.
- Being an excellent role model – this includes not smoking or drinking alcohol in the company of children, young people or vulnerable adults.
- Giving enthusiastic and constructive feedback rather than negative criticism.
- Securing parental consent to act *in loco parentis* if the need arises to administer emergency first aid and/or other medical treatment.

- Keeping a written record of any injury that occurs, along with the details of any treatment given.
- Requesting parental consent if staff are required to transport a child, young person or vulnerable adult in their car and must always follow the risk assessment.

6. Practices to be avoided

The following should be avoided except in emergencies. If cases arise where these situations are unavoidable it should be with the full knowledge and consent of someone in charge in the organisation or the child, young person or vulnerable adult's parents. For example, a child, young person or vulnerable adult sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a child up at the end of a session.

- Avoid spending excessive amounts of time alone with a child, young person or vulnerable adult away from others.
- Avoid taking or dropping off a child, young person or vulnerable to a *Snow Camp* session/event/activity.

Practices never to be sanctioned

The following should never be sanctioned. You should never:

- Engage in rough, physical or sexually provocative games, including horseplay.
- Share a room with a child, young person or vulnerable adult.
- Allow or engage in any form of inappropriate touching.
- Allow children, young people or vulnerable adults to use inappropriate language unchallenged.
- Make sexually suggestive comments to a child, young person or vulnerable adult, even in fun.
- Reduce a child, young person or vulnerable adult 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.
- Do things of a personal nature for a child young person or vulnerable adult that they can do for themselves.
- Invite or allow children, young people or vulnerable adults to stay with you at your home.

7. Incidents that must be reported/recorded

If any of the following occur you should report this immediately to another colleague and record the incident. You should also ensure the parents/carers of the child, young person or vulnerable adult are informed along with their youth worker/social worker:

- If you accidentally hurt a child, young person or vulnerable adult.
- If a young person seems distressed in any manner.
- If a child, young person or vulnerable adult appears to be sexually aroused by your actions.

- If a child, young person or vulnerable adult misunderstands or misinterprets something you have done.

8. Use of photographic/filming equipment at Snow Camp sessions

There is evidence that some people have used sporting activities as an opportunity to take inappropriate photographs or film footage of children, young people or vulnerable adults in vulnerable positions. All staff/volunteers/counsellors must be vigilant, and any concerns must be reported to the Designated Person(s).

Videoring as a coaching aid: there is no intention to prevent Programme Managers and external coaches using video equipment as a legitimate coaching aid. However, children, young people or vulnerable adults and their parents/carers should be made aware that this is part of the coaching programme and such films should be stored safely.

9. Recruitment and training of staff and volunteers

Snow Camp recognises that anyone may have the potential to abuse children, young people or vulnerable adults in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children, young people or vulnerable adults.

Pre-selection checks must include the following:

- Job adverts highlight *“Snow Camp is committed to safeguarding and promoting the welfare of children. All posts are subject to pre-employment checks, references will be sought, and successful candidates will need to undertake an enhanced DBS check”*
- All staff/volunteers must consent to Snow Camp seeking enhanced information from the Disclosure and Barring Service (DBS) or Protecting Vulnerable Groups (PVG) in Scotland if they are not on the DBS live update service.
- Two confidential references, including one regarding previous work with children.
- Evidence of identity (passport or driving licence with photo).
- All staff whether paid or a volunteer, will be expected to provide evidence of their qualifications and experience. Copies are retained in their HR file on Staff ology.

Interview and induction

All employees and volunteers will be required to undergo an interview carried out to acceptable protocol and recommendations. All employees and volunteers will receive formal or informal induction, during which:

- Their qualifications should be substantiated.
- The job requirements and responsibilities should be clarified.
- They must all read and sign up to the Snow Camp Staff Behaviour Policy and Code of Conduct.
- Safeguarding Children, Young People & Vulnerable Adults procedures are explained outlining their responsibilities and procedures to be followed if anyone has any concerns about a child’s safety or welfare.

- Training needs are identified as part of their induction and courses are booked for them to attend if needed.
- If they are on the DBS live update service, they must share their Enhanced DBS certificate with their line manager who will perform a status check to allow *Snow Camp* to see if any relevant information that has been identified about the individual since their Enhanced DBS Certificate was last issued.

The outcome of a valid Status check will be one of the following:

- **This Certificate did not reveal any information and remains current as no further information has been identified since its issue.** This means that the individual's Certificate contains no criminality or barring information and no new information is available.
- **This Certificate remains current as no further information has been identified since its issue.** This means that the individual's Certificate did contain criminality or barring information and no new information is available.
- **This Certificate is no longer current. Please apply for a new enhanced DBS check through Snow Camp to get the most up to date information.** This means that the individual's Certificate should not be relied upon as new information is now available and you should request a new DBS check with Snow Camp.

Training

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff and volunteers to:

- Analyse their own practice against established good practice, and to ensure their practice is likely to protect them from false allegations.
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse.
- Respond to concerns expressed by a child, young person or vulnerable adult.
- Work safely effectively with children, young people or vulnerable adults.

Snow Camp requires:

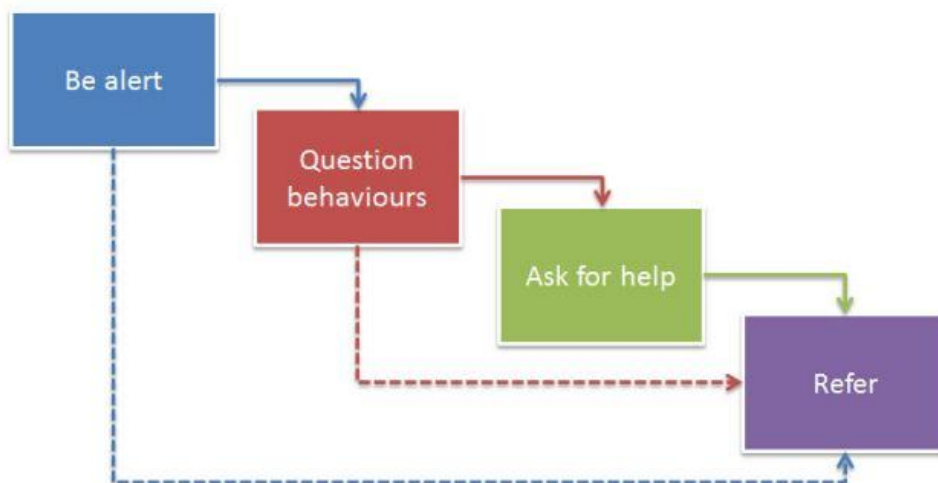
Their paid staff working directly with young people to attend a recognised 3-hour good practice and Safeguarding Child Protection awareness training workshop, to ensure their practice is exemplary and to facilitate the development of a positive culture towards good practice and child protection. Such as the UK Coaching NSPCC Safeguarding and Protecting Children in Sport course or similar.

- Snow Camp Safeguarding Lead and Deputy Lead to undertake Safeguarding Lead Training every 2 years from London Youth or NSPCC.
- Volunteers and other youth staff to complete a recognised Safeguarding and Child Protection training course. As above.
- Relevant personnel to receive advisory information outlining good practice and informing them about what to do if they have concerns about the behaviour of an adult towards a young person.
- All Snow Camp offices to display the Snow Camp Safeguarding Disclosure – How to respond flow chart poster on the wall and this is to be placed into all Programme Folders to be taken on courses.

- Relevant staff working directly with young people to attend a national first aid training course (where necessary).
- Attend update training when necessary. Information about meeting training needs can be obtained from Sports Coach UK, the NSPCC, London Youth, Snowsport England and the Sport Council.
- Snow Camp Safeguarding Lead to be signed up to the NSPCC CASPAR (Current Awareness Service for practice, policy and research) so they receive regular awareness for practice, policy and research which delivers weekly email alerts to keep up to date with all the latest Safeguarding Children, Young People & Vulnerable Adults news.
- Snow Camp Chair of Trustee Board to be DBS checked every 3 years or DBS on live update service.

10. Responding to allegation or suspicions

There are four key steps for Snow Camp staff/ volunteers to follow to help identify and respond appropriately to possible abuse and/or neglect.



It may not always be appropriate to go through all four stages sequentially. If a child is in immediate danger or is at risk of harm, you should refer to Snow Camp Lead Safeguarding team /children's social care and/or the police.

Before doing so, you need to establish the basic facts. However, it will be the role of social workers and the police to investigate cases and make a judgement on whether there should be a statutory intervention and/or a criminal investigation.

It is not the responsibility of anyone working in *Snow Camp*, in a paid or unpaid capacity to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns through contact with the appropriate authorities.

11. Whistleblowing Policy - Action if there are concerns

Whistleblowing is the mechanism by which staff can voice their concerns, without fear of repercussion. Whistleblowing is when someone raises a concern about a dangerous or illegal activity or any wrongdoing within their organisation. Raising a concern is known as “blowing the whistle” and is a vital process for identifying risks to people’s safety. All staff need to raise concerns to Snow Camp Safeguarding Leads Lara Kinnear or Matt Conroy or they can go directly to Ian Brown Chair of the Snow Camp Trustee board.

All Snow Camp staff have a duty to report any behaviour by a colleague which raises concern. Staff should contact Lara Kinnear to raise a concern or email directly Ian Brown Chair of the Snow Camp Trustee board ian@snow-camp.org.uk This is particularly important where the welfare of young people may be at risk.

Snow Camp will assure all staff/volunteers that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child.

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.

1. Concerns about poor practice:

- If, following consideration, the allegation is clearly about poor practice; the Designated Person will deal with it as a misconduct issue.
- If the allegation is about poor practice by the Designated person, or if the matter has been handled inadequately and concerns remain, it should be reported to Chair of the Snow Camp Trustees Ian Brown via ian@snow-camp.org.uk

2. Concerns about suspected abuse

- Any suspicion that a child, young person or vulnerable adult has been abused by either a member of staff or a volunteer should be reported to the Designated Person, who will take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk.
- LADO The Local Authority Designated Officer (LADO) is the person who should be notified when it has been alleged that a professional or volunteer who works with children has, behaved in a way that has harmed a child, or may have harmed a child, possibly committed a criminal offence against or related to a child. Each local authority has a LADO, this link will help you identify the local authority <https://www.gov.uk/find-local-council>
- The Designated Person will speak with the Local Safeguarding Children’s Board (LSCB) in the area the child lives (*See appendix for database of LSCBS in the areas Snow Camp*

operates). This is made up of statutory and voluntary partners, representatives from Health, Children's Services, Police, Probation, the Community and Voluntary Sector as well as Lay Members. Their main role is to coordinate what is done locally to protect and promote the welfare of children and young people in the city and to monitor the effectiveness of those arrangements to ensure better outcomes for children and young people.

- The Designated Person will refer the allegation to the social services department who may involve the police or go directly to the police if out-of-hours.
- If a referral is made direct to Children and Young People's Social Care this link will enable you to find the child or young persons local authority <https://www.gov.uk/find-local-council> completed within 24 hours. And this link will Find a local NHS urgent mental health helpline in England <https://www.nhs.uk/service-search/mental-health/find-an-urgent-mental-health-helpline>
- The parents or carers of the child, young person or vulnerable adult will be contacted as soon as possible following advice from the social services department or the LSCB. unless to do so would place the child at an increased risk of harm.
- The youth/social worker of the child, young person or vulnerable adult will be contacted as soon as possible.
- If the Designated Person is the subject of the suspicion/allegation, the report must be made to the Founder of Snow Camp Dan Charlish or in their absence it should be reported to Chair of the Snow Camp Trustees Ian Brown.

12. 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. This includes the following people:

- The Designated Lead Person.
- The Deputy Designated Person.
- The parents/carers of the person who is alleged to have been abused.
- The person making the allegation.
- Youth Worker/Social Worker/Teacher involved with the child, young person or vulnerable adult.
- Social services/police.
- The alleged abuser (and parents if the alleged abuser is a child). Seek social services advice on who should approach the alleged abuser.

Information will be stored in a secure place with limited access to designated people, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure). The details will be stored on Upshot database on the child, young person or vulnerable adult's profile. This must be restricted access to the Safeguarding leads and Manager involved in the allegation.

Internal Enquires and Suspension

- The *Snow Camp* Designated Lead Person will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries.
- Irrespective of the findings of the social services or police inquiries the *Snow Camp* Directors will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision; particularly where there is insufficient evidence to uphold any action by the police. In such cases, the *Snow Camp* Directors must reach a decision based upon the available information which could suggest that on a balance of probability, it is more likely than not that the allegation is true. The welfare of the child, young person or vulnerable adult should remain of paramount importance throughout.

Support to deal with the aftermath of abuse

- Consideration must be given to the kind of support that children, young people or vulnerable adult's parents and members of staff may need. Use of helplines, support groups and open meetings will maintain an open culture and help the healing process.
- Staff and parents can refer a child, young person or vulnerable adult (up to 21 years) for counselling through a partnership with the Stop.Breathe.Think. charity. They can receive up to 6 one-to-one counselling sessions through this charity. Children, young person or vulnerable adults will always be offered a referral to the Stop.Breathe.Think. charity to support with the aftermath of abuse.
- Consideration should be given to what kind of support may be appropriate for the alleged perpetrator.
- The LSCB gives support for children, parents and staff in the area that is available.

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/counsellor/volunteer who is still currently working with children, young people or vulnerable adult's).

Where such an allegation is made, *Snow Camp* will follow the procedures as detailed above and report the matter to the social services or the police. This is because other children, young people or vulnerable adults at *Snow Camp* may be at risk from this person. Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children. This is reinforced by the details of the Protection of Children Act 1999.

13. Action if bullying is suspected

If bullying is suspected, the same procedure should be followed as set out in 'Responding to suspicions or allegations' above.

Action to help the victim and prevent bullying at *Snow Camp*:

- Take all signs of bullying very seriously.
- Encourage all children, young people or vulnerable adults to speak and share their concerns.

- Investigate all allegations and take action to ensure the victim is safe. Speak with the victim and the bully(ies) separately.
- Reassure the victim that you can be trusted and will help them, although you cannot promise to tell no one else.
- Keep records of what is said (what happened, by whom, when).
- Report any concerns to the Designated Safeguarding Lead Person/s.

Action towards the bully(ies):

- Talk with the bully(ies), explain the situation, and try to get the bully (ies) to understand the consequences of their behaviour. Seek an apology to the victim(s).
- Inform the bully's parents.
- Insist on the return of 'borrowed' items and that the bully(ies) compensate the victim.
- Provide support for the victim's coach.
- Impose sanctions as necessary.
- Encourage and support the bully(ies) to change behaviour.
- Hold meetings with the families to report on progress.
- Inform all organisation members of action taken.
- Keep a written record of action taken.

14. Action if suicide is mentioned by a child, young person or vulnerable adult on Snow Camp programmes

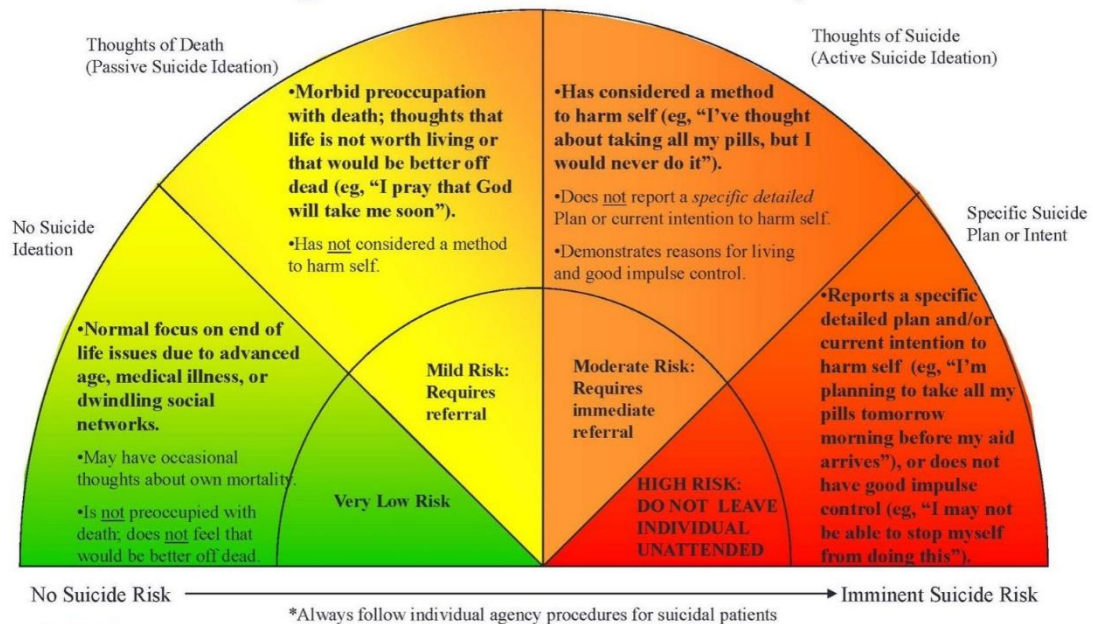
If a child, young person or vulnerable adult mentions they feel suicidal, the same procedure should be followed as set out in 'Responding to suspicions or allegations' above direct to the Safeguarding Leads Lara Kinnear and Matt Conroy. They will organise for the Wellbeing Manager in their region to talk with the young person to assess the level of risk on the spectrum below.

For the staff member, there is no right or wrong way to talk about suicidal feelings – starting the conversation is what's important. Talk to the young person and just listening can help someone work through what's on their mind. When people feel listened to, it can save a life.

If Wellbeing Manager or any Staff members feel the young person is at high risk and there is planning or intent to harm themselves, please either:

1. Take young person straight to A & E at the nearest hospital to admit themselves so they can get immediate help.
2. If young person is not with you and you have been talking over the phone, establish their location details. If they hang up the phone notify their emergency contacts immediately to check on them.
3. If in any doubt ring 999 to report this, so they Police can support.

Assessing Suicide Risk as a Spectrum



It is important to advise them on the support available right now. Tell them they do not need to struggle with difficult feelings alone. Give them the free phone numbers below:

- Offer them a referral to our partnership with Stop.Breathe.Think Charity and have an intake session and be matched to a counsellor who is trained to manage high risk clients.
- Speak to their GP and ask for a confidential appointment
- Call 111 out of hours and they will help find young people support
- Samaritans 116 123 – Open 24/7 days a week
- Campaign against living miserably (CALM) 0800 585858 5pm-midnight everyday
- Papyrus 0800 068 41 41 Mon-Fru 9am-10pm
- Childline young people under 19 - 0800 1111 The number will not show up on your phone bill.

Concerns outside Snow Camp (e.g parent or carer):

Report your concerns to the Designated Safeguarding Lead Person/s, who will contact social services or the police as soon as possible.

- See 4. below for the information social services or the police will need.
- If the Designated or Deputy Designated Person are not available, the person being told of or discovering the abuse should contact social services or the police immediately.

- Social Services and the Designated Safeguarding lead Person/s will decide how to involve the parents/carers.
- Maintain confidentiality on a **need to know** basis only.
- See below regarding information needed for social services.

Information for social services or the police about suspected abuse:

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern, which should include the following: (Please see appendix 2 for a copy of the reporting form)

- Staff name completing the form
- Date and time
- The child's name, age and date of birth of the child.
- The child's home address and telephone number.
- Whether or not the person making the report is expressing their own concerns or those of someone else.
- Details of what happened and where the disclosure took place. The nature of the allegation. Include dates, times, any special factors and other relevant information.
- Write down as much as you can, as precisely as possible, using the disclosure's words.
- Make a clear distinction between what is fact, opinion or hearsay.
- A description of any visible bruising or other injuries. Also any indirect signs, such as behavioural changes. Please use the Non-Accidental Injuries sheet in Appendix 2 to refer to.
- Details of witnesses to the incidents.
- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred.
- Have the parents been contacted?
- If so what has been said?
- Has anyone else been consulted? If so record details.
- If the child was not the person who reported the incident, has the child been spoken to? If so what was said?
- Has anyone been alleged to be the abuser? Record details.
- Where possible referral to the police or social services should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.
- The staff member completing the reporting form should Sign and date it.

15. The Prevent Duty

From July 2015 all providers are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, to have 'due regard to the need to prevent people from being drawn into terrorism'.

This duty is known as the Prevent duty. **The Prevent duty's aim** is to help stop vulnerable people from being exploited and drawn into terrorism.

Key legal definitions for the Preventing extremism duty include British values and extremism.

What are British values?

These are defined as: 'Democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.'

Mutual respect and tolerance includes encouraging students to respect other people with particular regard to the protected characteristics of the Equality Act (2010).

What is extremism?

Extremism as is defined in law as: 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.'

We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.'

From the Counter-terrorism and Security Act 2015 www.legislation.gov.uk

Channel

Individuals who are judged to be vulnerable to exploitation by extremists may be offered tailored support by the Channel Panel. Channel assesses vulnerability in relation to three criteria. The three criteria are:

1. engagement with an extremist group
2. cause or ideology intent to cause harm
3. and capability to cause harm.

The Channel process deals with all forms of extremism and individuals from all backgrounds. Any referral is screened to check that there is a genuine vulnerability around radicalisation and the referral is not malicious or misinformed.

What are British values?

British values have been defined in law as:

Democracy will include encouraging learners to take part in democratic processes and understand how democracy influences all our lives e.g. through laws.

The rule of law will include encouraging learners to research health and safety laws which regulate industry or review the health and safety processes relevant to their work.

Individual liberty will include encouraging learners to discuss the extent that this exists or is limited by regulation.

Mutual respect and tolerance will include encouraging learners to respect other people with particular regard to the protected characteristics of the Equality Act [2010].

They might also discuss their own freedom of choice in terms of future education and career choices. Source: Prevent duty Guidance for Further education, July 2015.

Snow Camp requires:

- All Snow Camp staff working with young people to undertake the Governments free online Prevent Duty Training course 1:
<https://www.elearning.prevent.homeoffice.gov.uk/la2/screen1.html> - designed to raise awareness of the Prevent duty by:

- Providing case studies and activities that help to support this process
- identify why you need to be aware of your Prevent duties
- understand your specific role as an employer

16. FGM

Female Genital Mutilation also known as female circumcision, cutting or sunna. Is the deliberate mutilation of female genitalia. This is often the removal or cutting of the labia and clitoris. The World Health Organization describes **FGM** as any procedure that injures the female genital organs for non-medical reasons.

- Duty to pass any information on in relation to under 18 years. A crime has taken place so Police must be involved. Please let your Safeguard Lead know the details immediately if you have a concern.
- UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean.
- Non-African communities that practice FGM include Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

FGM is illegal in the UK

It is an offence to:

- perform FGM (including taking a child abroad for FGM)
- help a girl perform FGM on herself in or outside the UK
- help anyone perform FGM in the UK
- help anyone perform FGM outside the UK on a UK national or resident
- fail to protect a girl for whom you are responsible from FGM

Anyone who performs FGM can face up to 14 years in prison. Anyone found guilty of failing to protect a girl from FGM can face up to seven years in prison.

If you are in the UK and are concerned that a young person may be taken overseas for the purpose of FGM please call the police by dialling 999.

- If you are abroad and require help or advice please call the Foreign and Commonwealth Office on +44 (0) 20 7008 1500
- You can also access help and support from: NSPCC FGM Helpline: 0800 028 3550
Email: fgmhelp@nspcc.org.uk
- Childline Tel: 0800 1111 www.childline.org
- Equality Now (in Nairobi and London) Tel : +44(0) 20-7304 6902
www.equalitynow.org

17. County Lines

The UK Government defines county lines as: *“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.” Ministry of Justice, County Lines Exploitation Document Oct 2019

County lines drug dealing is a national issue involving organised drug dealing networks exploiting children and vulnerable adults to move, hold and sell Class A drugs across the UK, using dedicated mobile phone lines to take orders. Although Class A drug supply underpins county lines offending, exploitation remains integral to the business model and county lines offenders recruit, transport and exploit children and vulnerable adults to carry out activity including preparing, moving, storing and dealing illegal drugs. The victims are often children, commonly males aged 15 to 17 years, who are groomed with money, gifts or through sexual and violent relationships, and forced to move, store and deal, Class A drugs.

Children as young as 11 years of age have been reported as being exploited. It is important to stress here that child victims can be both male and female. Methods of control include:

- Debt bondage, including staged robberies
- Sexual abuse, particularly against females, including for blackmail and humiliation purposes
- Violence (real and threatened) is used to coerce victims to become dealers, enforce debts, and use victim’s accommodation as an operating base
- Kidnap against victims and their families
- County lines and the associated violence, drug dealing and exploitation has a devastating impact on children, vulnerable adults, families and local communities.
- Signs to look out for a young person’s involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a person’s lifestyle should be discussed with them. Some potential indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:
 - persistently going missing from school/home/care and / or being found out-of-area
 - Children travelling to locations, or being found in area’s they have no obvious connections with, including seaside or market towns
 - Unwillingness to explain their whereabouts
 - Unexplained acquisition of money, clothes, accessories or mobile phones which they are unable to account for
 - Excessive receipt of texts or phone calls
 - Children having multiple mobile phone handsets or sim cards
 - Withdrawal or sudden change in personality, behaviour or language used
 - Relationships with controlling or older individuals and groups
 - leaving home or care without explanation
 - Suspicion of physical assault or unexplained injuries
 - Parental concerns
 - Carrying weapons

- Significant decline in school results or performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

Please note this list is not exhaustive, and you should seek advice from the Snow Camp Safeguarding Leads if you are concerned. These are safeguarding issues and should be reported to your Safeguarding Lead immediately. Snow Camp need to be aware of the prevalence and magnitude of Child Sexual Exploitation (CSE) in county lines activity for both female and male children.

The Government definition of CSE in the Department for Education Child Sexual Exploitation: Definition and a guide for practitioners 2017, local leaders and decision makers working to protect children from child sexual exploitation is:

“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.

Further details can be read in the county lines government guidance document:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839253/moj-county-lines-practical-guidance-frontline-practitionerspdf.pdf

Further information on safeguarding children from extra-familial harms can be found in the Department for Education’s Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf

18. Anti-Slavery Statement

Snow Camp oppose Modern Slavery and Human Trafficking in all its forms.

Snow Camp has a zero-tolerance approach to modern slavery and is committed to preventing acts of slavery and human trafficking from occurring within its business.

19. Review of the Policy

This policy document is to be kept up to date. The policy will be reviewed annually by the Managing Director & Programme Director, who will review the contents and operation of the Safeguarding Children, Young People & Vulnerable Adults policy.

Last Review: 07/08/2026

Appendix 1: Glossary

Definitions of abuse

These definitions are based on those from *Working Together to Safeguard Children* (Department of Health, Home office, Department for Education and Employment, 2018)

ITEM	DESCRIPTION
Children	Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.
Safeguarding and promoting the welfare of children	Defined for the purposes of this guidance as: a. protecting children from maltreatment b. preventing impairment of children's health or development c. ensuring that children are growing up in circumstances consistent with the provision of safe and effective care d. taking action to enable all children to have the best outcomes
Child protection	Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.
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. A person might do this because they enjoy or need the attention they get through having a sick child. Physical abuse, as well as being the result of a deliberate act, can also be caused through omission or the failure to act to protect.
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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious acoso escolar (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.
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. They may also include 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. Boys and girls can be sexually abused by males and or females, by adults and by other young people. This includes people from all different walks of life.
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.
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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: a. provide adequate food, clothing and shelter (including exclusion from home or abandonment) b. protect a child from physical and emotional harm or danger c. ensure adequate supervision (including the use of inadequate caregivers) d. ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. It is accepted that in all forms of abuse there are elements of emotional abuse, and that some children are subjected to more than one form of abuse at any time.
Extremism	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.
Young carer	A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work).
Parent carer	A person aged 18 or over who provides or intends to provide care for a disabled child for whom the person has parental responsibility.
Education, Health and Care Plan	A single plan, which covers the education, health and social care needs of a child or young person with special educational needs and/or a disability (SEND). See the Special Educational Needs and Disability Code of Practice 0-25 (2014).
Local authority designated officer	County level and unitary local authorities should ensure that allegations against people who work with children are not dealt with in isolation. Any action necessary to address corresponding welfare concerns in relation to the child or children involved should be taken without delay and in a coordinated manner. Local authorities should, in addition, have designated a particular officer, or team of officers (either as part of multi-agency arrangements or otherwise), to be involved in the management and oversight of allegations against people who work with children. Any such officer, or team of officers, should be sufficiently qualified and experienced to be able to fulfil this role effectively, for example qualified social workers. Any new appointments to such a role, other than current or former designated officers moving between local authorities, should be qualified social workers. Arrangements should be put in place to ensure that any allegations about those who work with children are passed to the designated officer, or team of officers, without delay.
Safeguarding partners	A safeguarding partner in relation to a local authority area in England is defined under the Children Act 2004 as: (a) the local authority, (b) a clinical commissioning group for an area any

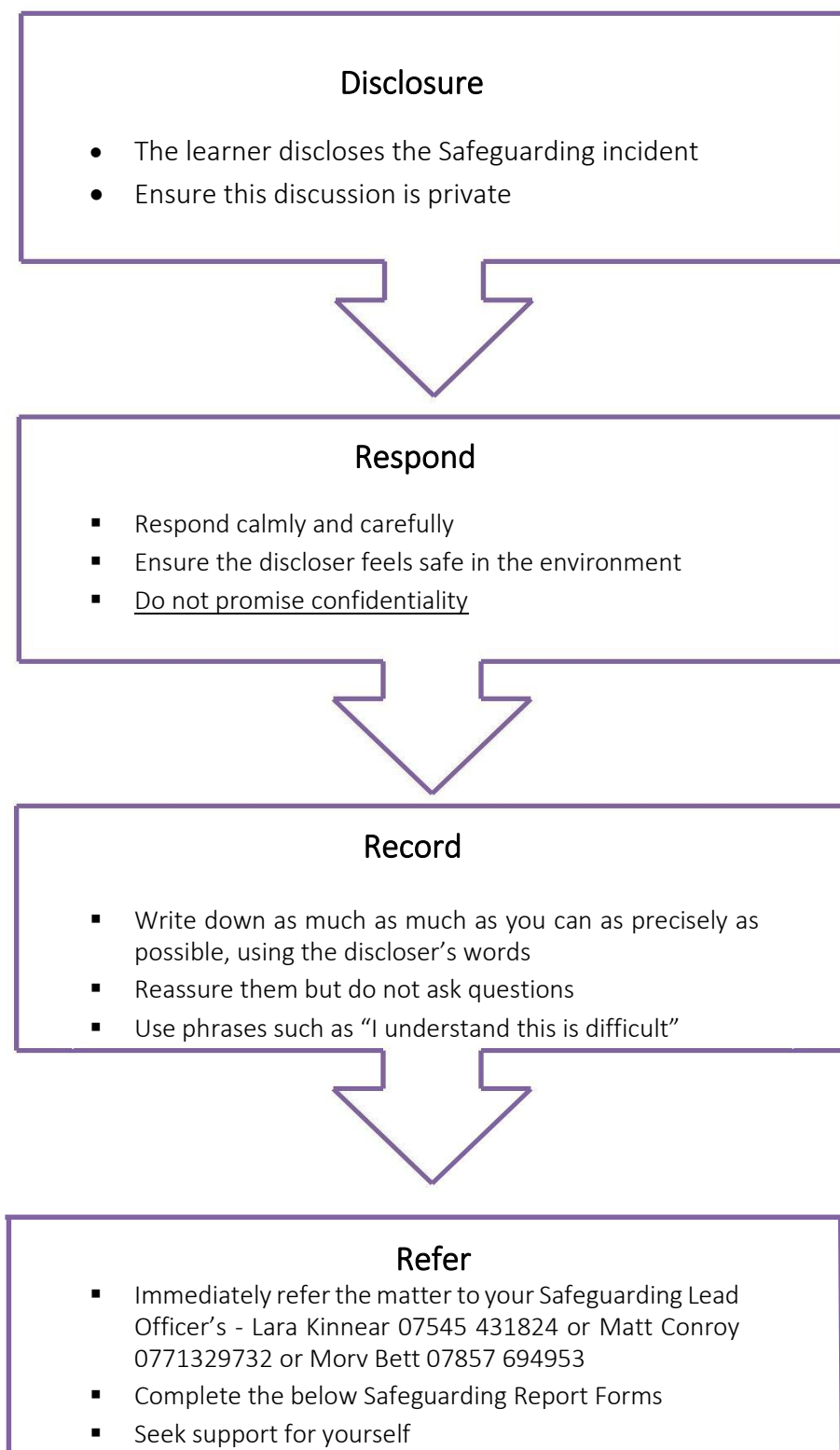
	part of which falls within the local authority area, and (c) the chief officer of police for an area any part of which falls within the local authority area. The three safeguarding partners should agree on ways to co-ordinate their safeguarding services; act as a strategic leadership group in supporting and engaging others; and implement local and national learning including from serious child safeguarding incidents. To fulfil this role, the three safeguarding partners must set out how they will work together and with any relevant agencies as well as arrangements for conducting local reviews.
County Lines	As set out in the Government Serious Violence Strategy, updated June 2018 by the Home Office, 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.
Child criminal exploitation	As set out in the Serious Violence Strategy, published by the Home Office and updated June 2018, 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 appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Appendix 2: Recognising and Responding to Abuse

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered.

Abuse categories	Description
Physical signs of abuse	-Any injuries not consistent with the explanation given for them -Injuries which occur to the body in places which are not normally exposed to falls -Unexplained bruising, marks or injuries on any part of the body -Bruises which reflect hand marks or fingertips (from slapping or pinching) -Cigarette burns / Bite marks / Broken bones / Scalds /Injuries which have not received medical attention -Neglect-under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care -Repeated urinary infections or unexplained stomach pains
Changes in behaviour which can also indicate Physical abuse	-Fear of parents being approached for an explanation -Aggressive behaviour or severe temper outbursts -Flinching when approached or touched -Reluctance to get changed, for example, wearing long sleeves in hot weather -Depression -Withdrawn behaviour -Running away from home
Physical signs of Emotional abuse	-A failure to thrive or grow particularly if a child puts on weight in other circumstances e.g. in hospital or away from their parents' care -Sudden speech disorders -Persistent tiredness -Development delay, either in terms of physical or emotional progress
Changes in behaviour which can also indicate Emotional abuse include	-Obsessions or phobias -Sudden under-achievement or lack of concentration -Inappropriate relationships with peers and/or adults -Being unable to play -Attention seeking behaviour -Fear of making mistakes -Self-harm -Fear of parent being approached regarding their behaviour
Physical signs of Sexual Abuse	-Pain or itching in the genital/anal area -Bruising or bleeding near genital/anal areas -Sexually transmitted disease -Vaginal discharge or infection -Stomach pains -Discomfort when walking or sitting down -Pregnancy
Changes in behaviour which can also indicate sexual abuse	-Sudden or unexplained changes in behaviour e.g. becoming withdrawn or aggressive -Fear of being left with a specific person or group of people -Having nightmares -Running away from home -Sexual knowledge which is beyond their age or developmental level -Sexual drawings or language -Bedwetting

	-Eating problems such as over-eating or anorexia -Self-harm or mutilation, sometimes leading to suicide attempts -Saying they have secrets they cannot tell anyone about -Substance or drug abuse -Suddenly having unexplained sources of money -Not allowed to have friends (particularly in adolescence) -Acting in a sexually explicit way with adults -Frequently staying out late or overnight with no explanation
The physical signs of Neglect	-Constant hunger, sometimes stealing food from other children -Constantly dirty or smelly -Loss of weight or being constantly underweight -Inappropriate dress for the conditions
Changes in behaviour which can also indicate neglect include	-Complaining of being tired all the time -Not requesting medical assistance and/or failing to attend appointments -Having few friends -Mentioning being left alone or unsupervised
Some Signs and Symptoms of Abuse in an Adult	This list is not exhaustive, and it is important to remember that individually they may not give rise to concern but a persistent presentation of a combination of these signs and symptoms may indicate ongoing abuse - Becoming withdrawn - Withdrawing from friends and family - Losing interest in hobbies, job etc. - Low self-esteem/confidence - Depression - Anxiety - Self-harm - Suicidal thoughts - Suicide attempts - Other mental health issues - Slower than normal development - Running away from home - Rapid weight loss or gain - Repeated illnesses - Alcohol misuse - Drug misuse - Sudden changes in behaviour – becoming too withdrawn or erratic - Evident bruising, scratches, cuts or other marks and injuries



Appendix 4 Safeguarding Cause for Concern Form

This form should be completed when there is cause for concern and given to your Designated Safeguarding Lead as soon as possible.

Young person name:
DOB & Age:
Region:
Youth Project:

Details of person reporting concern(s)
--

Do these concerns relate to a specific incident/disclosure?

If YES complete Section A.

If NO, move straight to Section B

Section A:
Date and time of incident/disclosure:
Location of incident/disclosure:
Date this form was completed:
Other persons present:

Section B:
<u>Concern described in sufficient detail</u> ✓Distinguished between fact, opinion, and hearsay? ✓Clients own words used? (Swear words, insults or intimate vocabulary should be written down verbatim - If verbatim cannot be quoted the use the term 'words to the effect of') ✓Jargon free? ✓Free from discrimination/stereotyping or assumptions? <i>Along with using the young person's own words as per the above guidance any questions asked must be recorded verbatim as well as answers given. A prompt that the person receiving the disclosure is NOT an investigator and in the main must not ask questions – however the caveat to that is questions that ensure immediate safety e.g., if the session is over zoom, the client is at home discloses where is the perpetrator now? (To ensure immediate safety) There may be others but that is one that best explains the type of questions to ask e.g., not evidence gathering ones.</i> Details of concern/disclosure/incident: Action taken: Any other relevant information:

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Signed:	Date:
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Note: When a disclosure is made the person to whom the disclosure is made must make the referral to social care/ emergency services etc. as this prevents dilution of the information and “Chinese whispers”

For completion by the Designated Safeguarding Lead (DSL):

DSL Response:
Action taken by DSL:
Rationale for decision making/actions taken:
Outcome of action taken by DSL:
Follow up action by DSL:
Feedback given to person reporting the concerns:.

Checklist for DSL:

- ✓Concern described in sufficient detail?
- ✓Distinguished between fact, opinion, and hearsay?
- ✓Child’s own words used? (Swear words, insults or intimate vocabulary should be written down verbatim)
- ✓Jargon free?
- ✓Free from discrimination/stereotyping or assumptions?
- ✓Concern recorded and passed to DSL in a timely manner?

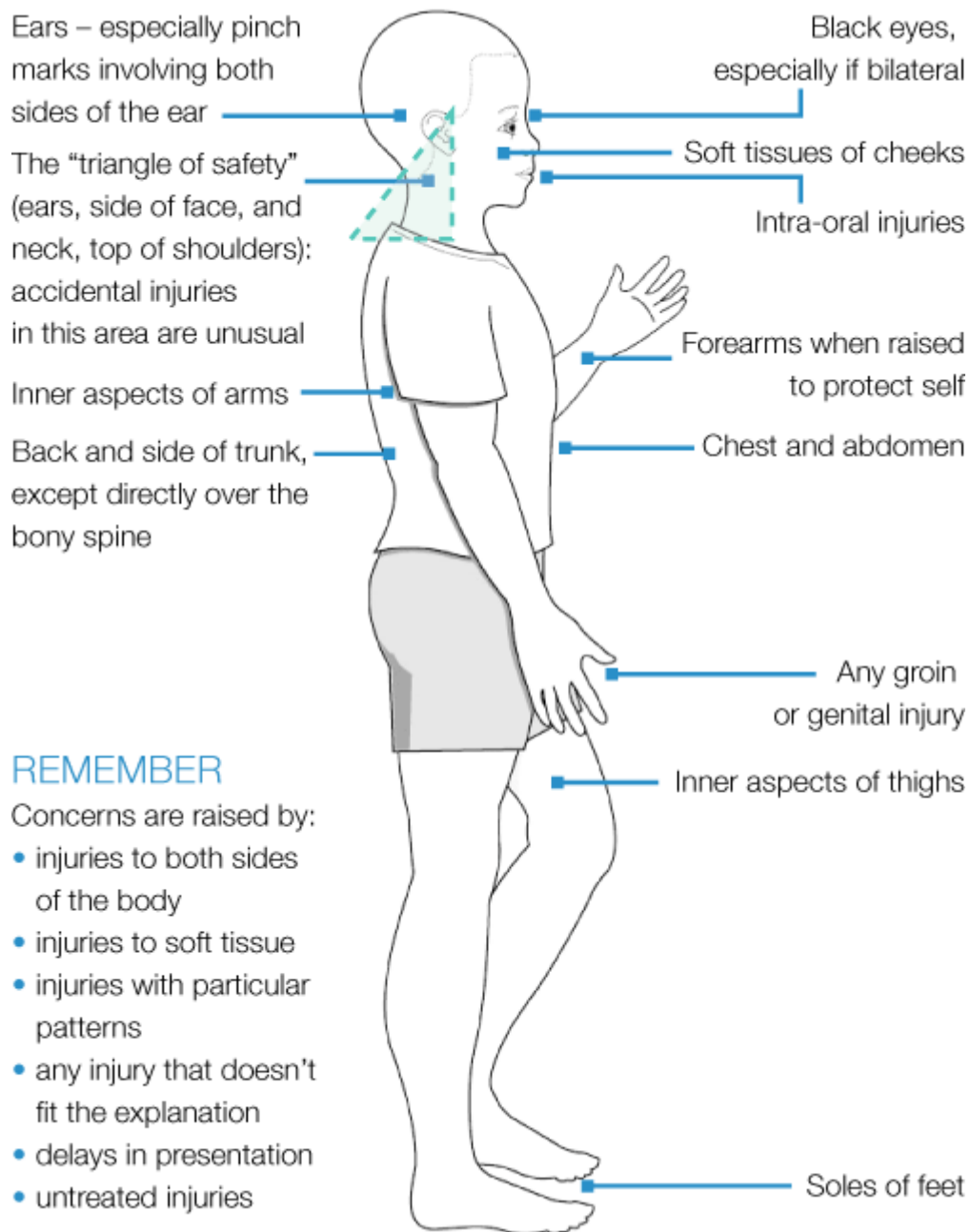
Signed by DSL/Deputy DSL:

Date:

Full Name:



Safeguarding Non-Accidental Injuries



Safeguarding Record Front Sheet

For Safeguarding concerns/incidents where there is a need to keep a Chronology and Record of Actions.

Full Name:	DOB:	SC Region:	Additional needs:	
Gender:	Ethnicity:			
Home Address:		Telephone:		
		E mail:		
Any other child protection records held in setting relating to this child/young person or a child/young person closely connected to him/her?				
YES/NO WHO?				
Members of household: ADD NUMBER HERE				
Name	Relationship to child	DOB/Age	Tel No	
Significant Others (relatives, carers, friends, young person minders, etc.)				
Name	Relationship to child	Address	Tel No	
Other Agency Involvement: ADD NAMES OF AGENCIES/YOUTH PROJECTS ETC HERE				
Name of officer/person	Role and Agency	Status of child/Young person i.e. CAF/CIN/CP/LAC	Tel No	Date

Complete for all incidents of concern with an ongoing open case and ensure you have completed the Safeguarding Record Front sheet to go with this (significant information may also be added).

[illegible]