
Coin Street

*Coin Street Centre
Trust*

*Coin Street
Community Builders*

*Colombo Street
Community & Sports
Centre*

*Coin Street
Secondary Housing
Co-operative*

Dec 22

SAFEGUARDING POLICY & PROCEDURES

**Reviewed and agreed on behalf of Coin Street Centre
Trust**

Chair's signature

(Lenny Goodrich)



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Safeguarding Policy

1. Safeguarding Policy Statement

This document refers throughout to Coin Street. The term 'Coin Street' refers to the following independent organisations that choose to work together in furtherance of shared objectives in the Waterloo and North Southwark area.

These organisations comprise

- Coin Street Centre Trust
- Coin Street Community Builders
- Colombo Street Community and Sports Centre
- Coin Street Secondary Housing Co-operative

Currently, the Coin Street Centre Trust proposes and oversees safeguarding policy, practice and procedures on behalf of the organisations defined above under the term 'Coin Street'. Each organisation is responsible for reviewing proposed policy, practice and procedures and adopting these, should they be considered fit for purpose.

This safeguarding policy and its procedures underpin all activity which involves working with children, families, young people and vulnerable adults. This includes the family and children centre and youth and community programmes operated jointly by Coin Street Centre Trust and Coin Street Community Builders.

The purpose of this policy is to protect children, young people and vulnerable adults and to provide parents, staff and volunteers with the overarching principles that guide our approach to safeguarding. This policy applies to anyone working on behalf of the Coin Street including senior managers and trustees, paid staff, volunteers, sessional workers, agency staff and students.

We believe that

- The welfare of the child, young person or vulnerable adult is paramount, and it is always unacceptable for a person to experience abuse or neglect of any kind
- All children, young people and adults, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse
- We have a responsibility to promote the welfare of all children, young people and vulnerable adults to keep them safe, and to practise in a way which protects them
- Working in partnership with children & young people, their parents, carers and other agencies is key to promoting their welfare
- Adults who work with children, young people and vulnerable adults are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions

We are committed to practice that protects children, young people and vulnerable adults from harm and we recognise our duty to ensure appropriate action is taken where a child, young person or vulnerable adult is experiencing harm or is at risk of harm.

Our approach to supporting safeguarding is underpinned by a suite of policies, which include our staff code of conduct, our Anti-Bullying and Harassment Policy, our E-Safety Policy and others contained or referenced in this document.

2. Definitions:

Children and young people

Throughout this document references are made to 'children' and 'young people'. These terms are interchangeable and refer to children who have not yet reached their 18th birthday.

Vulnerable adults

A vulnerable adult is a person over the age of 18 who is or may be for any reason unable to take care of himself or herself, or unable to protect himself or herself against significant harm or exploitation. Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations.

An adult may be vulnerable if he/she:

- Has a learning or physical disability
- Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs
- Has a reduction in physical or mental capacity
- Is in the receipt of any form of healthcare
- Is detained in custody
- Is receiving community services because of age, health or disability
- Is living in sheltered or residential care home
- Is unable, for any other reason, to protect himself/herself against significant harm or exploitation.

Staff

References to staff refer to any adult who is employed, commissioned or contracted to work with, or on behalf of, children, young people or vulnerable adults, in either a paid or unpaid capacity. It also includes volunteers, students and adults working on behalf of partner agencies who are delivering services on Coin Street premises and satellite sites.

3. Legal framework

Everyone has a right to be safeguarded from abuse or neglect. There is a legislative framework in place to safeguard children and vulnerable adults through The Children Act 1989 (as amended by section 53 of the Children Act 2004) and the Safeguarding Vulnerable Groups Act 2006. This policy reflects the principles established by these acts and related guidance. This includes:

- The Children Act 1989 (and 2004 amendment) which provides a framework for the care and protection of children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Children and Families Act 2014
- Keeping Children Safe in Education 2022
- Working Together to Safeguard Children (Department for Education, 2018)
- Inspecting safeguarding in early years, education and skills (Ofsted, 2022)
- Early Years and Foundation Stage Framework (Department for Education, 2021)
- What to do if you worried a child is being abused? (Department for Education, 2015)
- The Childcare (Disqualification) Regulations 2009 and Childcare Act 2006, which set out who is disqualified from working with children, and the Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Safeguarding Disabled Children (Department for Education, 2009)
- Statutory guidance on the Prevent duty, which explains duties under the Counter- Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Statutory guidance on Female Genital Mutilation (FGM), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM, and the mandatory reporting duty set out by the Home Office in 2015
- Mental Capacity Act 2005
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Care Act 2014

Safeguarding as defined by Working Together to Safeguard Children (2018) is:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

and their Child Protection definition is:

"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"

The aims of adult safeguarding are to

- *stop abuse and neglect where possible*
- *prevent harm and reduce the risk of abuse and neglect*

- *safeguarding people in a way that supports them in making choices and having control about how they want to live*
- *concentrate on improving life for the person concerned*
- *provide accessible information, advice and support about how to stay safe and raise a concern*
- *address the cause of the abuse and neglect*

Our practice is guided by local safeguarding procedures as set out in the London Child Protection Procedures, (updated 2022) and LB Lambeth Safeguarding Adults Board and LB Lambeth Safeguarding Children Partnership guidance which includes the Multi-Agency Escalation Policy Threshold Guidance and Threshold Chart and Young People at Risk Strategy

4. Roles and responsibilities

The role of the board of trustees

By agreement with Coin Street Community Builders, the trustees of Coin Street Centre Trust are the lead body for Coin Street in setting and overseeing safeguarding practice and policy. This board will ensure the Coin Street organisations meet their statutory duties regarding safeguarding and protecting children in line with the provisions set out in the statutory guidance 'Keeping Children Safe in Education', 2022.

The Board will challenge the leadership team on the delivery of this policy and monitor its effectiveness, reviewing this policy every year and amending and adopting it in accordance with any new legislation or guidance.

The Board will ensure that a senior member of staff is appointed Designated Safeguarding Lead (DSL) with responsibilities for carrying out the statutory duties as set out in this policy. They will ensure that the DSL(s) is properly supported in this role with the time and resources needed.

The Board has a nominated trustee for safeguarding. The nominated trustee will take the lead role in ensuring that the Coin Street organisations have an effective policy which interlinks with other related policies; that locally agreed procedures are in place and are being followed; and that the policy and structures supporting safeguarding children are reviewed at least annually.

The role of the Designated Safeguarding Lead (DSL)

The Board has appointed David Hopkins as the Designated Safeguarding Lead (DSL). The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) in the organisation. This includes the following:

- Providing support and advice to staff
- Ensure all staff access appropriate safeguarding training and relevant updates
- Making referrals as appropriate to social care and to OFSTED
- Recording the number and nature of safeguarding concerns and incidents.

In addition, Hommie Beharry, Melanie Davies, Natalie Bell, Jane Christofi, Hayley McGrane and Rehema Essop act as Deputy Designated Safeguarding Leads and part of the Safeguarding Team. The safeguarding role all members of the Safeguarding Team should be inserted specifically in each member's job description.

The DSL's and Safeguarding Team will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. This training will be approved by and meet the standards as required by the Lambeth Children's Safeguarding Partnership.

The DSL's and Safeguarding Team's training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods, including training, local authority bulletins, meetings etc., at regular intervals, at least annually, to keep up with any developments relevant to their role.

During normal working hours, the DSL and or a deputy will be available for staff to discuss any safeguarding concerns. The DSL will ensure adequate cover during holiday periods. A contact details sheet for the Safeguarding team will be displayed where services are delivered.

The role of staff

Coin Street staff are particularly important as they can identify concerns early, provide help for children, young people and vulnerable adults and prevent concerns from escalating.

All members of staff have a responsibility to:

- Provide a safe environment for children, young people and vulnerable adults
- Ensure all children, young people and vulnerable adults can develop appropriate strategies to recognise and respond to risk and build resilience
- Identify and recognise children, young people and vulnerable adults who may need early help, who are suffering, or are likely to suffer significant harm
- Provide help for children, where appropriate and reasonable
- Take appropriate action to prevent safeguarding concerns escalating and work with other services as needed
- Be aware of and take appropriate action to raise concerns regarding poor or unsafe practice or potential failures in the Coin Street safeguarding regime (this may include accessing the whistleblowing policy)
- Maintain an attitude of 'it could happen here' where safeguarding is concerned and to always act in the best interests of the child
- Respond to and refer any concerns about children or other members of the community in accordance with this policy
- Contribute towards, read and adhere to Coin Street policies

All members of staff must know what to do if a child, young person or vulnerable adult tells them he/she is being abused or neglected. Members of staff know to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and other agencies as appropriate. Members of staff know they must never promise a child that they will not tell anyone about a concern or allegation, as this may ultimately not be in the best interests of the child.

If any member of staff has any concerns about a child or vulnerable adult, they must alert the Designated Safeguarding Lead immediately. If the DSL agrees there are grounds for concern, they must take appropriate action to safeguard the child or vulnerable adult.

It is not the responsibility of Coin Street to decide whether abuse has taken place. It is the responsibility of staff at Coin Street to act if there is cause for concern, in order that the appropriate agencies can investigate and take any action necessary to protect the young and/or vulnerable adult.

If a member of staff is concerned that a child or vulnerable adult is in immediate danger, or requires immediate medical treatment, they should call the police and/or emergency medical services on 999 straight away.

5. Types and Effects of Abuse

What is Abuse?

Abuse is a deliberate act of ill-treatment that can harm or is likely to harm a person's safety, wellbeing and development. There are four formal categories of abuse. These are:

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or adult. Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child. Female Genital Mutilation (FGM) also falls under this category as an offence.

Physical abuse indicators	
Physical indicators	Behavioural indicators
Unexplained injuries – bruises / abrasions / lacerations	Withdrawn or aggressive behavioural extremes
The account of the accident may be vague or may vary from one telling to another	Uncomfortable with physical contact
Unexplained burns	Seems afraid to go home
Regular occurrence of unexplained injuries	Complains of soreness or moves uncomfortably
Most accidental injuries occur on parts of the body where the skin passes over a bony protrusion.	Wears clothing inappropriate for the weather, in order to cover body.
	The interaction between the child and its carer

Neglect

The persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born it may involve a parent failing to:

- Provide adequate food, clothing or shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's or vulnerable adult's basic emotional needs.

Neglect indicators	
Physical indicators	Behavioural indicators
Unattended medical need	Poor social relationships
Underweight or obesity	Indiscriminate friendliness
Recurrent infection	Poor concentration
Unkempt dirty appearance	Low self-esteem
Body odour issues	Regularly displays fatigue or lethargic
Inadequate / unwashed clothes	Frequently falls asleep in class
Consistent lack of supervision	Frequent unexplained absences
Consistent hunger	
Inappropriately dressed	

Emotional Abuse

The persistent emotional ill treatment of a child or vulnerable adult. It may involve conveying to a child or young person that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's development 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 (for example in cases of domestic abuse). It may involve serious bullying, causing children or vulnerable adults to 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 or vulnerable adult, though it may occur alone.

Emotional abuse indicators	
Physical indicators	Behavioural indicators
<p>Poor attachment relationship</p> <p>Unresponsive / neglectful behaviour towards the child's emotional needs</p> <p>Persistent negative comments about the child.</p> <p>Inappropriate or inconsistent expectations</p> <p>Self-harm</p>	<p>Low self-esteem</p> <p>Unhappiness, anxiety</p> <p>Withdrawn, insecure</p> <p>Attention seeking</p> <p>Passive or aggressive behavioural extremes</p>

Sexual Abuse

Forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or adult 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 (including via the internet). Sexual abuse can be perpetrated by adult men and women, as well as children against other children.

Sexual abuse indicators	
Physical indicators	Behavioural indicators
<p>Sign of blood / discharge on the child's underclothing.</p> <p>Awkwardness in walking / sitting</p> <p>Pain or itching – genital area</p> <p>Bruising, scratching, bites on the inner thighs / external genitalia.</p> <p>Self-harm</p> <p>Eating disorders</p> <p>Sudden weight loss or gain</p>	<p>Sexually proactive behaviour or knowledge that is incompatible with the child's age & understanding.</p> <p>Drawings & or written work that is sexually explicit</p> <p>Self-harm / Suicide attempts</p> <p>Running away</p> <p>Substance abuse</p> <p>Significant devaluing of self</p> <p>Loss of concentration</p>

Forms of abuse that may affect children and vulnerable adults include:

- Child sexual exploitation
- Child trafficking
- Discriminatory abuse
- Domestic violence or abuse
- Emotional abuse
- Female Genital Mutilation (FGM)
- Child on Child abuse
- County lines
- Financial or material abuse
- Grooming
- Harmful sexual behaviour
- Modern slavery
- Neglect
- Online abuse
- Organisational or institutional abuse
- Physical abuse
- Psychological or emotional abuse
- Radicalisation of children or vulnerable adults
- Self-neglect
- Sexual abuse

These categories can overlap, and an abused child or adult often suffers more than one type of abuse.

6. Responding to abuse

There are several ways in which a concern may be raised that a child, young person or vulnerable adult has been or is being abused:

- Disclosure, a child or vulnerable adult may tell about abuse they have experienced (currently or historically)
- A third party – a parent, relative, carer, another child, neighbour – sharing concerns
- Concern about the conduct of colleagues.

All staff and volunteers must understand common signs that may indicate abuse. These may include:

- Unexplained concerns about health and development
- Concerns about the parent/carer/child relationship
- Mental ill health, substance or alcohol misuse which is adversely affecting parents/carers capacity
- Inappropriate explanation for injuries to the child or vulnerable adult
- Domestic abuse in the home environment
- Concerns about an unborn child where there are previous concerns about an older child
- Information from a third party
- Significant changes in a child or vulnerable adult's behaviour
- Deterioration in the child or vulnerable adult's well being
- Mention of a holiday to a home country where FGM is practiced widely

- Unexplained bruising, marks or signs of possible abuse
- The comments a child or vulnerable adult makes which give cause for concern.

All parents/carers should be advised that, to avoid misunderstandings any injuries/marks sustained outside the provider's hours should be notified to a member of staff on arrival. We will require parents/carers to complete and sign an existing injuries form in this circumstance. Likewise, the setting must tell the parents/carers collecting a child of any injury/mark occurring during the child's time spent at the setting or activity. Staff must ask parents/carers to sign an accident form to say they have been informed of any injury/mark.

7. Responding to abuse or a safeguarding concern

Both recognising and responding to abuse can be a complex matter. Experience has shown that there are many barriers that individuals often must overcome before taking appropriate action. These may include:

- Finding it hard to believe what they are hearing
- Fear of being mistaken
- Anxiety about starting a process which may lead to the break up of a family
- Ignorance about what might happen next
- Anxiety that the matter could be perceived as trivial
- Interpreting abuse of one child or young person by another as "normal" experimentation

It should be recognised that it is rarely easy for a child, young person or vulnerable adult to disclose they are being abused. They also have barriers to overcome before telling about their abuse. Factors which can inhibit an individual from telling include:

- Being scared because they have been threatened
- Belief they will be taken away from home
- Belief they are to blame
- Feelings of embarrassment
- Not wanting the abuser to get into trouble

The effect of abuse on a child or vulnerable adult depends on several factors and is not readily predictable. However, abuse is never trivial. Abuse in all its forms can affect a person at any age. The effect can be so damaging that the consequences are felt throughout their life.

Staff need to be aware that there are many common myths about the child protection system. One of the most common is that reporting child abuse means that a child or young person will be removed from their parents. This is rarely true and, even when it is, most children are returned to parental care. The reality is that many children are protected, and their wellbeing promoted as a consequence of child abuse being reported and investigated.

What to do when a disclosure of abuse is made

Situations where a child, vulnerable adult or parent discloses important information may include:

- A child/young person/ vulnerable adult /parent talking about an incident
- A child/young person/vulnerable adult /parent responding to an adult asking about a mark, bruise or well-being.

Your role:

- **Do not promise confidentiality:** you have a duty to refer
- Listen, and do not interrupt, if the individual is recalling significant events
- Keep calm and be patient. Reassure the individual they are being taken seriously and they will
- 'Let the silence do the heavy lifting'. In cases where a child/young person or vulnerable adult is finding it hard to share, single word prompts such as when, where, how, who can be effective. You should avoid using the prompt 'why' when fielding the initial disclosure.
- Ask questions to clarify what the individual is saying (questions should be framed in an open manner and not lead the child/vulnerable adult/parent/carer in any way) Do not be intimidated or afraid of talking to an individual about safeguarding issues – this may mean the difference in their lives that they are looking for
- Reassure the individual that they have done the right thing by telling you. Let them know they are being taken seriously, and they will be supported and kept safe.
- Tell them what you are going to do next
- Do not ask the individual to repeat it all to another member of staff
- Make a note of the conversation as soon as is reasonably practicable (but within 1 hour)

Record: Name of child/young person /vulnerable adult / parent/ carer
Your name
Date and time
Place of discussion
Other people present
What the individual actually said as far as possible
The facts you need to report
Your signature

Report: to the Designated Safeguarding Lead or deputy or senior member of staff on the same working day. Preferably using the safeguarding concern form on our MyConcern safeguarding system.
Do not hesitate when reporting – remember you may not know all the information about this child/ vulnerable adult or their family

It is important not to write speculative comments but to adhere to the facts. Your opinion may be crucial, but you should ensure that it is recorded as an opinion and that evidence can be stated to support opinions. Records pertaining to issues of safeguarding may be accessible to third parties such as social services, police, the courts and solicitors.

When making a record of the disclosure use the words of the child/young person or adult as much as possible. When doing so, you must use inverted commas to denote direct quotes. This helps to capture the voice of the person making the disclosure.

It is important to be aware that children, young people or vulnerable adults may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, they may feel embarrassed, humiliated, or threatened. Exercising professional curiosity can draw out important information. Do speak to a member of the safeguarding team if you have concerns and they will help you work through how to explore these concerns.

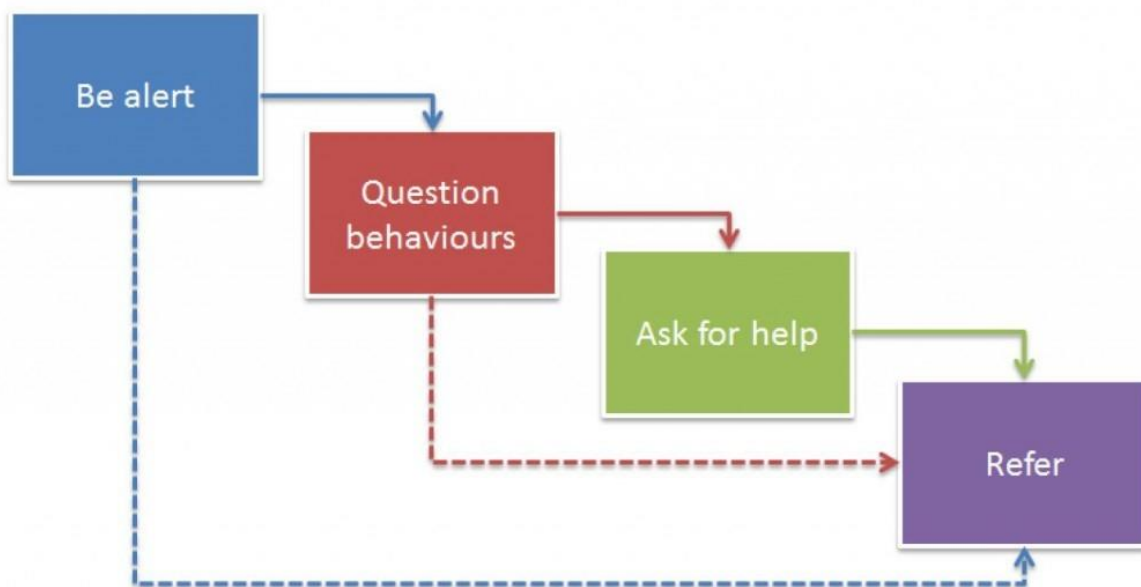
Coin Street is committed to working in partnership with parents and carers and to share with them issues or concerns relating to their children. In general members of staff will notify parents or carers of our intention to make a referral to social care, however if seeking consent is likely to put the child at increased risk of significant harm the consent of the parent or carer is not required. An example would be concern that the parent or carer is responsible for the abuse and may try to silence the child or further abuse him/her. In such cases, Coin Street will work closely with an external agency, e.g. social care or police to ensure that next steps are in the best interests of the affected individual. If in doubt, advice should be sought from social care as to whether and how to inform parents.

8. Referring concerns or disclosures

The Coin Street organisations adhere to Lambeth and Southwark Safeguarding Children Procedures. The full procedures can be found on the LSCP website www.lambethsaferchildren.org.uk and SSCP website <http://www.safeguarding.southwark.gov.uk/southwark-safeguarding-board>

'What to do if you are worried about a child being abused' (DfE 2015) p.12 identifies that there are four key steps for professionals to follow to help identify and respond appropriately to possible abuse and/or neglect.

All members of staff are expected to show "professional curiosity" and be aware of and follow this approach:



It is not always appropriate to go through all four stages sequentially and if a child, young person or vulnerable adult is in immediate risk or danger, a referral should be made immediately to social care and/or the police.

The role of Coin Street in situations where there are child or vulnerable adult protection concerns is NOT to investigate but to recognise and refer.

It is the responsibility of the DSL / Deputy DSL to receive and collate information regarding individual children, young people and vulnerable adults and to make immediate and on-going assessments of potential risk and to decide actions necessary (with parents / carers in most cases).

In the following circumstances, an immediate referral would normally be made:

- the child, young person or vulnerable adult has told someone they have been abused
- the child, young person or vulnerable adult has a suspicious injury for which there is no satisfactory explanation
- there are concerns and the child, young person or vulnerable adult is afraid to return home
- the child (or another child e.g. sibling), young person or vulnerable adult is at immediate risk
- a child has abused another child

Where a child, young person or vulnerable adult might require immediate medical attention due to abuse or neglect, the Designated Safeguarding Lead should arrange medical care and must inform the doctor of their suspicions at the earliest opportunity.

On occasion, staff may pass information about a child or vulnerable adult to the DSL/Deputy DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child or vulnerable adult is safe, and their welfare is being considered. Should a member of staff who has shared a concern with the DSL or Deputy feel the concern has not been acted on appropriately, they should contact the Group Director Iain Tuckett or the Coin Street Safeguarding Trustee Jo-Anna van der Bosch

If after a referral a child or vulnerable adult's situation does not appear to be improving, then the DSL/Deputy DSL (or the person that made the referral) will request reconsideration to ensure that the settings concerns have been addressed and, most importantly, that the situation improves.

The Designated Safeguarding Lead or deputy, to whom the concerns are reported, has responsibility for deciding whether to refer the matter onto the relevant social services and/or the police and for making the referral.

If in doubt, advice on referrals for children and young people can be sought from the following:

- The NSPCC Child Protection Helpline (0808 800 5000)
- The Lambeth Safeguarding Children Board Integrated Referral Hub on 020 7926 3100 or 0207 926 5555 (24 hr)
- Southwark Safeguarding Children Board Multi Agency Safeguarding Hub on 020 7525 1921 or 020 7525 5000 (24 hr)

If in doubt, advice on referrals for vulnerable adults can be sought from the following:

- Hourglass (for older people) Helpline on 080 8808 8141
- Lambeth Adult Social Care Services on 020 7926 5555
- Southwark Adult Social Care on 020 7525 3324 (for adults with a physical or sensory disability or over 65), 020 7525 0088 (for adults with a mental illness) or 020 7525 2333 (for adults with a learning disability)

The Designated Safeguarding Lead should:

- Refer any child /vulnerable adult protection concerns to Lambeth or Southwark Social Care or the Police, where there is:
 - clear evidence of abuse or concern for a child or vulnerable adult's immediate safety,
 - concern that a child or vulnerable adult may be in need, including concerns about significant harm
 - a child has witnessed domestic abuse , has suffered significant harm or is at risk of suffering significant harm through domestic abuse . This includes situations where the child is yet to be born but the mother is at risk of domestic abuse .
- Inform the Local Authority Designated Officer (LADO), Ofsted and, where appropriate, the DBS (Disclosure and Barring Service) without delay of any allegations of serious harm or abuse by any person working or looking after children at the premises
- Maintain accurate and secure child protection records
- Ensure arrangements are in place for Safeguarding training for all setting staff

Referral should be made to the local authority in which the child or vulnerable adult is currently residing.

The Designated Safeguarding Lead must refer all actual or suspected cases of child abuse to:

- The Lambeth Safeguarding Children Board Integrated Referral Hub on 020 7926 3100 or 0207 926 5555 (24 hr)
- Southwark Safeguarding Children Board Multi Agency Safeguarding Hub on 020 7525 1921 or 020 7525 5000 (24 hr)

This includes concerns or allegations directly from children, parent/carer or another staff member. Child protection concerns must be referred regardless of whether the suspected or actual abuse has occurred on the childcare premises or at another location.

The Designated Safeguarding Officer must refer all actual or suspected cases of abuse of vulnerable adults to:

- Lambeth Adult Social Care Services on 020 7926 5555
- Southwark Adult Social Care on 020 7525 3324 (for adults with a physical or sensory disability or over 65), 020 7525 0088 (for adults with a mental illness) or 020 7525 2333 (for adults with a learning disability)

All referrals should be made within the same working day and all notifications made by telephone must be followed up by a written referral on referral form as soon as possible, but within 24 hours. The referral form should be emailed to the referral hub. If acknowledgement is not received from the hub the DSL should follow up to ensure it has been received.

If the child or adult has an allocated Social Worker they or their manager or, in their absence, the Duty Social Worker should be informed immediately.

It is important when reporting any incident that a social worker or social work manager is spoken to directly. Referrals should not be passed to clerical or administrative staff. The Designated Safeguarding Lead or Deputy referring the incident/allegation should note whom they spoke to and the proposed action by social services/police.

9. Consent for making a referral

For children and young people

In all but the most exceptional circumstances, parents /carers will be made aware of the concerns for their child at the earliest possible stage. In the event of a referral to the safeguarding hub being necessary, parents/carers will be informed.

Consent will be sought unless there is a valid reason not to do so; for example, if to do so would put a child at risk of harm and/or would undermine a criminal investigation. A decision by any professional not to seek parental permission before making a referral to Children's Social Care must be recorded and the reasons given. Where a parent has agreed to a referral, this must be recorded and confirmed on the relevant referral form.

Where the parent is consulted and refuses to give permission for the referral, and having taken full account of the parent's wishes, it is still considered that there is a need for a referral:

- The reason for proceeding without parental agreement must be recorded;
- The Children's Social Care team should be told that the parent has withheld her/his permission;
- The parent should be contacted by the referring professional to inform her/him that after considering their wishes, a referral has been made.

A young person aged 16 or over, or a child aged between 12 and 15 who has the capacity to understand and make their own decisions, may give (or refuse) consent to disclosure. Otherwise a person with parental responsibility should consent on their behalf and must give consent where the child is under 12.

For vulnerable adults

Where the DSL wishes to make a referral, they should establish:

- The current level of risk and what immediate steps are needed to ensure safety
- The individual's wishes and views about the safeguarding issue including their views regarding sharing information with other agencies i.e. the local authority or the police
- Wherever possible, safeguarding concerns should be raised with the consent of the adult (*however consent is not required to raise a safeguarding concern*)
- Where there are issues of mental capacity, whether the adult has capacity to make specific decisions regarding their own protection and to understand the safeguarding process.

If the individual lacks the mental capacity to provide consent, further advice should be sought but this should not prevent a referral where there is concern that there is actual or suspected abuse.

The priority in safeguarding is to ensure the safety and well-being of the adult. However, there may be some occasions when the adult at risk does not want to pursue a referral to the Local Authority.

If the decision is to act without the adult's consent, then unless it is unsafe to do so, the adult

should be informed that this is being done and of the reasons why. For example, where you believe there is a threat to someone's life and you believe the person is unable to protect themselves because of their physical or mental health vulnerabilities.

Where such decisions have been taken, staff should keep a careful record of the decision-making process.

There are only a limited number of circumstances where it would be acceptable to not share information pertinent to safeguarding with the local authority. These would be where the person involved has the mental capacity to make the decision about sharing information, does not want their information shared and:

- nobody else is at risk
- no serious crime has been or may be committed
- the alleged abuser has no care and support needs
- no staff are implicated
- no coercion or duress is suspected
- the public interest served by disclosure does not outweigh the public interest served by protecting confidentiality
- the risk is not high enough to warrant a multi-agency risk assessment conference referral
- no other legal authority has requested the information

10. Information sharing and record keeping

Information sharing is vital to safeguarding and promoting the welfare of children and vulnerable adults.

We will ensure any information shared is accurate, up-to-date, and necessary for the purpose we are sharing it, shared only with the people that need to see it and is shared securely. We will always record the reasons for our decisions – whether we share information or not.

Staff should ensure that all concerns and allegations are treated with sensitivity and confidentiality.

Full records must be maintained and securely stored for all child or vulnerable adult protection concerns, referrals to Lambeth or Southwark Social Care, or allegations made against a member of staff. At Coin Street we use the safeguarding MyConcern software to do so. Details of individual concerns, disclosures or incidents should include:

- Full details of concern or allegation, which records where possible the words used by a parent/carer, vulnerable adult or child to describe the incident
- Full name. Date of birth and address of child or vulnerable adult
- Full details of all other parties involved
- Relevant dates, times and locations.
- Details of any witnesses or other relevant evidence
- Decisions and actions that have been taken and why

It is important to take care in distinguishing between fact and opinion when recording suspected incidents of abuse. Written records should be made as near as possible to when the information

was shared, to ensure accuracy. The Designated Safeguarding Lead is responsible for ensuring that written records are dated, signed and kept confidentially.

Staff must ensure that all concerns and allegations are treated with sensitivity and confidentiality.

11. Making a referral to Early Help

All staff should be aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a child may benefit from early help should discuss this with the DSL or Deputy DSL. If early help is appropriate, the DSL will generally lead on liaising with relevant agencies and setting up inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving or is getting worse.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child

Information on the Lambeth Early Help offer and referral process can be found here <https://www.lambeth.gov.uk/children-young-people-and-families/access-support-for-your-family> and information on the Southwark Family Early Help offer and referral process here <https://www.southwark.gov.uk/schools-and-education/information-for-parents/family-early-help-feh>

12. Allegations against members of staff and volunteers

Where it is alleged that a member of staff (including volunteers) has:

- behaved in a way that has harmed a child or vulnerable adult, or may have harmed a child or vulnerable adult;
- possibly committed a criminal offence against or related to a child or vulnerable adult; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children or vulnerable adults

The matter must be brought immediately to the attention of the Designated Safeguarding Lead. If the Designated Safeguarding Lead is the subject of the allegation, then this should be reported to the Group Director Iain Tuckett and/or the Coin Street Safeguarding Trustee Jo-Anna van der Bosch.

The Local Authority Designated Officer (LADO) and Ofsted will then be informed immediately for further advice and guidance. A full investigation will be carried out by the appropriate professionals (LADO, Ofsted) to determine how this will be handled. Coin Street reserves the right to suspend any member of staff during an investigation.

See Appendix 3 for the full detailed procedure to be followed when an allegation is made against a member of staff or a volunteer.

13. Working with the aftermath

What happens after a referral has been made varies from case to case.

In the case of possible child abuse, social care and the police will decide whether to instigate a child protection enquiry (known as a section 47 enquiry) based on the referral and other known information about the child and family. If a child protection enquiry is instigated, some or all of the following processes may follow:

- A strategy discussion to plan the enquiry
- The enquiry itself
- An initial child protection conference – and subsequent review
- Registration of the child on the child protection register
- Assessment of the child using the Assessment Framework
- The forming of a Child Protection Plan
- Services to the child and family
- Care proceedings
- Criminal proceedings.

After an allegation or suspicion about a child protection concern has been investigated, there are likely to be strong feelings among staff, parents and children and possibly among the wider community, which will need to be addressed. There are likely to be issues of:

- Communication – rumour or fact
- Guilt and blame – if suspicions have been around for some time

- Impact – on individuals, of the nature of what occurred and to whom

In the case of abuse by a member of staff, there may be gaps in the organisation in terms of roles and posts held or change to service provision indicated.

The line manager, in conjunction with the Designated Safeguarding Officer, will need to give careful thought to the sharing of information and the provision of appropriate support. The opportunity to “debrief” after the event should be routinely considered and deciding who should be involved in this will clearly be related to the extent of knowledge about the concern and the impact on individuals.

14. Working with partner agencies

Coin Street is committed to working in partnership with local authorities and other agencies. When this involves an agreement for a Coin Street organisation to provide specific services on behalf of a local authority or another agency, there should be a written agreement or protocol which should include the procedure to be followed in the event of concerns about abuse. The purpose of this is to ensure clarity as to which organisation is responsible for acting in specific circumstances.

Where Coin Street is hosting activities being provided by partner agencies or agencies commissioned by a local authority we will seek to set up service level agreements with these agencies, issuing them with our safeguarding procedures and guidance and other key protocols and information within a provider’s information file.

15. Working with agency, temporary and supply staff

The Coin Street work with employment agencies to ensure that they have undertaken the following checks prior to sending a member of agency staff to our centre:

- Interview undertaken to ascertain professional competency and that the agency is content that the candidate shows:
 - Appropriate attitude toward children and young people;
 - Ability to support Coin Street’s practice in safeguarding and promoting the welfare of children;
 - Appropriate explanations for gaps in employment history;
- Receipt of at least two satisfactory references;
- Verification of the candidate’s identity;
- A DBS (Disclosure & Barring Service) Check;
- Verification of qualifications;
- Verification of professional status where required

Where a short-term placement is arranged the agency will issue us, in advance, with the agency staff members’ DBS number and date. All temporary staff are expected to bring agency ID when they arrive at the centre.

Where we seek a longer-term placement, we will arrange with the agency to also give sight of the agency staff members’ references. These will only be shared with the Coin Street People and Teambuilding Team and relevant managers.

When an agency staff member arrives for the first time they will be briefed on safeguarding procedures, alongside the general induction into the centre, for example regarding health and safety, behaviour policy and fire exit protocols.

16. Staff recruitment, support and training

Coin Street is committed to a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with children, young people and adults and have their welfare and protection as the highest priority.

The Board and Leadership Team are responsible for ensuring that safe recruitment processes are followed, including an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role and appropriate pre-appointment checks. Staff working with children, young people and vulnerable adults will be asked to confirm their continued suitability in an annual declaration and are expected to disclose any changes to this status as soon as it occurs.

All managers who are responsible for recruiting staff who will work with children and vulnerable adults will undertake Safer Recruitment training, at least every 3 years.

Coin Street maintains an accurate Single Central Record, which provides verification that key checks have been carried out logging the dates of these checks.

We will ensure that DBS checks are renewed every three years for all staff working with children, young people and vulnerable adults, as a condition of service.

In the rare circumstance that a member of staff or volunteer starts work before the DBS certificate is available, we will ensure that individual is appropriately supervised, and a risk assessment is in place which has looked at the circumstances of employment and other checks which have been undertaken. At no time should they be left in sole charge of children, young people or vulnerable adults or undertake any support with intimate care.

Where there is a disclosure on a DBS certificate for a prospective member of staff a risk assessment will be undertaken to make a judgement on the circumstances of the offence and its relevance to the employment.

We will ensure that under no circumstances a volunteer is allowed to work with children and vulnerable adults unsupervised. All volunteers will be suitably supervised and may be subject to an Enhanced DBS. Volunteers will work under the direct management of a staff member, and all volunteers will be subject to the same code of conduct as paid employees of the Coin Street organisations.

All staff and volunteers working with children, young people and vulnerable adults will be provided with training on safeguarding and child protection. This will include the main indicators of child abuse and how to respond and refer concerns to the appropriate services.

All staff and volunteers must be given a copy of our safeguarding policy (as well as a summary document with the key information highlighted) and informed who the Designated Safeguarding Lead is for the setting and their contact number and names of those deputising in their absence. Safeguarding responsibilities should be clearly explained during the induction process.

Appendix 1 Key safeguarding contacts

Safeguarding Team – report all concerns, disclosures and available for advice				
Designated Safeguarding Lead	David Hopkins	Coin Street Neighbourhood Centre – 2 nd Floor	020 7021 1654 / 07884 655 120	d.hopkins@coinstreet.org
Deputy Designated Safeguarding Leads	Hommie Beharry	Coin Street Neighbourhood Centre – 2 nd Floor	020 7021 1623 / 07894 422 008	h.beharry@coinstreet.org
	Jane Christofi	Coin Street Neighbourhood Centre – 1 st Floor	020 7021 1676 / 07884 667 857	j.christofi@coinstreet.org
	Rehema Essop	Coin Street Neighbourhood Centre – 1 st Floor	020 7021 1676 / 07824 140 880	r.essop@coinstreet.org
	Natalie Bell	Coin Street Neighbourhood Centre – 2 nd Floor	020 7021 1622 / 07375 040 441	n.bell@coinstreet.org
	Hayley McGrane	Coin Street Neighbourhood Centre – 2 nd Floor	020 7021 1634 / 07585 303 059	h.mcgrane@coinstreet.org
	Melanie Davies	Coin Street Neighbourhood Centre – 2 nd Floor	020 7021 1643 / 07827 242 413	m.davies@coinstreet.org
Safeguarding Trustees – report if the allegation is against the Designated Safeguarding Lead				
Safeguarding Trustee	Jo-Anna van der Bosch	Not based in the building		joantvdb@aol.com
Group Director	Iain Tuckett	Coin Street Neighbourhood Centre – 2 nd Floor	020 7021 1608	i.tuckett@coinstreet.org
If a child or vulnerable adult is at immediate risk or needs medical attention			Call 999	

Child Protection	Refer any case where you have reasonable cause to suspect a child or young person is suffering or is likely to suffer significant harm.	<p>The Lambeth Safeguarding Children Board Integrated Referral Hub on 020 7926 3100 or 0207 926 5555 (24 hr)</p> <p>helpandprotection@lambeth.gov.uk</p> <p>helpandprotection@lambeth.cjsm.net</p> <p>https://www.lambethsaferchildren.org.uk</p>
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		<p>Southwark Safeguarding Children Board Multi Agency Safeguarding Hub on 020 7525 1921 or 020 7525 5000 (24 hr)</p> <p>mash@southwark.gov.uk</p> <p>https://safeguarding.southwark.gov.uk/asking-for-help/</p> <p>If you suspect a child or young person is at immediate risk of harm, call the Police on 999.</p>
Safeguarding Vulnerable Adults	<p>There are dedicated teams in both LB Lambeth and Southwark to support with this kind of disclosure / issue.</p>	<p>Lambeth Adult Social Care Services on 020 7926 5555</p> <p>https://www.lambeth.gov.uk/community-safety-and-anti-social-behaviour/abuse-and-violence/report-neglect-or-abuse-of-an-adult</p> <p>Southwark Adult Social Care for adults with a physical or sensory disability or over 65 call 020 7525 3324 or email OPPDContactteam@southwark.gov.uk</p> <p>for adults with a mental illness call 020 7525 0088 / email MHContact@southwark.gov.uk</p> <p>for adults with a learning disability call 020 7525 2333 or email LearningDisabilitiesDuty@southwark.gov.uk</p> <p>https://www.southwark.gov.uk/social-care-and-support/adult-social-care/safeguarding-adults/safeguarding-adults</p>
Allegation against staff	<p>An allegation needs to be referred when any person who works with children (paid or unpaid) has:</p> <ul style="list-style-type: none"> • Behaved in a way that has or may have harmed a child • Possibly committed a criminal offence against a child • Behaved in a way that indicates they are unsuitable to work with children 	<p>Local Authority Designated Officer (LADO)</p> <p>Lambeth LADO - Andrew Zachariades on 020 7926 4679 or 07720 828 700</p> <p>LADO@lambeth.gov.uk</p>

Private Fostering Arrangements	A private fostering arrangement is between families/households without the involvement of the Local Authority, for the care of children under 16, by someone other than a parent, (including step-parent, sibling, grandparents, related Aunt/Uncle) for more than 28 days.	<p>To notify Lambeth Children Social Care of a private fostering arrangement please contact them on 0207 926 3100 or email helpandprotection@lambeth.gov.uk or help.protection@lambeth.cjsm.net</p> <p>To notify Southwark Children Social Care of a private fostering arrangement call the Assessment and Intervention Service on 020 7525 1921 or email MASH@southwark.gov.uk.</p>
Unregistered Childminders	Anyone who looks after someone else's children for more than two hours a day, in their own home, and receives payment for this must be registered with, and inspected by OFSTED.	<p>Lambeth Family Information Service on 020 7926 9558 or email fis@lambeth.gov.uk</p> <p>Southwark Family Information Service on 0800 013 0639 or family.info@southwark.gov.uk</p>
Complaint about Care Standards	<p>Direct general complaints about the standards of care provided by childminders, PVI's and Children's Centres that are not a direct allegation against a named member of staff or a child protection concern.</p> <p>Parent should be advised they can also contact Ofsted directly on 0300 123 1231</p>	<p>Lambeth Family Information Service on 020 7926 9558 or email fis@lambeth.gov.uk</p> <p>Southwark Family Information Service on 0800 013 0639 or family.info@southwark.gov.uk</p>
Domestic Abuse	<p>All cases of domestic abuse where there is a child under 12 months of age must be referred to Social Care.</p> <p>All other cases should be assessed under safeguarding procedures unless the child/ren or parent needs immediate protection.</p>	<p>The Lambeth Safeguarding Children Board Integrated Referral Hub on 020 7926 3100 or 0207 926 5555 (24 hr)</p> <p>helpandprotection@lambeth.gov.uk helpandprotection@lambeth.cjsm.net</p> <p>Southwark Safeguarding Children Board Multi Agency Safeguarding Hub on 020 7525 1921 or 020 7525 5000 (24 hr)</p> <p>mash@southwark.gov.uk</p>

Female Genital Cutting/ Mutilation	If a child under the age of 18 has had FGM, or if you have good reason to suspect they are at risk of FGM (having considered their family history or other relevant factor), they must be referred using standard existing safeguarding procedures, as is the procedure with all other instances of child abuse.	See Child Protection above. If urgent attention required (i.e. the child is about to leave the country and you suspect FGM will be undertaken) telephone 999 or 101 the non-emergency crime number. In addition, a referral should be made via the Lambeth or Southwark Safeguarding Hub.
Extremism and radicalisation	Registered early years providers and schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 of the need to prevent from people from being drawn into terrorism. This duty is known as the Prevent duty.	The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that staff can call to raise concerns about extremism with respect to a child or young person. You can also email counter.extremism@education.gov.uk . Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you think someone is in immediate danger, think someone may be planning to travel to join an extremist group or see or hear something that may be terrorist-related.

**Designated Safeguarding
Deputies**



Rehema Essop and Jane Christofi
Early Years Coach and Nursery Manager
020 7021 1676
r.essop@coinstreet.org
J.Christofi@Coinstreet.org



Natalie Bell
Head of Youth and Community
020 7021 1662 / 07375 040 441
n.bell@coinstreet.org



Hommie Beharry
Family Services Manager
020 7021 1623 / 07894 422 008
h.beharry@coinstreet.org



Melanie Davies
Head of People and Team Building
020 7021 1643 / 07827 242 413
m.davies@coinstreet.org

Safeguarding Children

What to do if you have a safeguarding concern about a child or young person

If you are **CONCERNED** a child is at risk or is suffering from:

If a child **DISCLOSES** that they are at risk or suffering from:

Physical abuse

Emotional abuse

Neglect

Sexual Abuse

Other concerns

In exceptional circumstances, concerns may be referred directly to Children's Social Care.

IMMEDIATELY discuss with a Designated Safeguarding Lead or deputy leads who may ask you to fill in a Yellow Form

LISTEN. REASSURE
DO NOT promise confidentiality.
Establish the basic facts — who, what, where and when? **REPORT IMMEDIATELY** to the Designated Safeguarding Deputies.

Designated Safeguarding Lead David Hopkins or Safeguarding Deputies Hommie Beharry, Jane Christofi, Natalie Bell, Melanie Davies and Rehema Essop.

**Designated Safeguarding Lead
David Hopkins**



Director of Community
020 7021 1654 or 07884 655 120
d.hopkins@coinstreet.org

Coin Street



If a child is at immediate risk, call the Police - 999

Lambeth
020 7926 5555
Southwark
020 7525 1921

Appendix 2 Partner agencies and safeguarding at Coin Street

This statement is to support those staff, volunteers or students working in partnership with Coin Street and potentially having access to children, young people or vulnerable adults whilst at our centre or taking part in service activities.

Coin Street consider it is unacceptable for an individual to experience abuse of any kind and recognise our responsibility to safeguard their welfare and protect them from abuse. All adults within our centre have the responsibility to do all we can to prevent abuse and to act in accordance with the good practice and procedures laid out within our safeguarding policy and procedures.

Our underpinning principles are:

- The welfare of the child is paramount
- All children, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from all types of harm and abuse
- Working in partnership with children, young people, their parents/carers and other agencies is key to promoting their welfare
- It is the responsibility of all adults to safeguard and promote the welfare of children and young people. This responsibility extends to duty of care for those adults employed, commissioned or contracted to work with children and young people.
- Adults who work with children are responsible for their own actions and behaviours and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Adults should work and be seen to work, in an open and transparent way
- The same professional standards should always be applied, regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.
- Adults should continually monitor and review their practice and ensure they follow the guidance contained in the Coin Street Safeguarding policy and procedures.

A vulnerable adult is a person who is, or may be, in need of care services, by reason of poor mental health, learning or other disability, age or illness, and who is, or may be, unable to take care of him or herself or unable to protect him or herself, against significant harm or exploitation.

Abuse is a violation of an individual's human right, by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or an omission to act or it may occur when a vulnerable person is persuaded to enter into a financial, or sexual transaction, to which he or she has not, or cannot, consent.

It is a requirement by Coin Street organisations that all relevant partner agencies should have the following in place when working with our service users / running activities from our premises:

1. An in-date DBS certificate by their current employer – with confirmation of date of DBS Certificate (or most recent status check) and that they are not barred from working in Regulated Activity sent to Coin Street's Designated Safeguarding Lead;
2. Have read and understood the Coin Street Safeguarding policy & procedures as part of their general induction to the centre;
3. Have been given information on who is the Designated Safeguarding Lead within Coin Street and how to contact them or their deputies, in the DSL's absence.

Information held on DBS for partner staff is held electronically in a restricted access folder and stored securely.

Good practice would suggest that training is given to partner staff undertaking work with children and/or vulnerable adults by their employing agency. (Relevant Coin Street staff are referred for refresher training every three years).

Our safeguarding policy and procedures are reviewed regularly to ensure they are in line with good practice and current legislative requirements. When a policy or procedure is updated and ratified by Trustees, copies are distributed to all staff, volunteers, students and partner staff for their personal use and to sign that they have read and understood the contents.

A meeting for clarification on any of the above or to further inform on our policies and procedures is offered to all partner agency staff by the Designated Safeguarding Lead – David Hopkins d.hopkins@coinstreet.org or 020 7021 1654.

Appendix 3 Procedure for allegations against a member of staff

Coin Street aims to provide a place where children/young people, adults and staff are safe. It is therefore important that we ensure we do not leave staff, volunteers, partners or students in vulnerable situations and that every effort should be made to avoid or minimise time when members of staff, students or volunteers are left alone with a child, young person or vulnerable adult. If a staff member is alone with a child or young person, the door of the room should be kept open and another member of staff should be informed.

If a child/young person makes inappropriate physical contact with a member of staff, student or volunteer, this will be recorded fully on an incident/accident record form.

Staff must never carry out a personal task for children that they can do for themselves, staff will need to be mindful of age appropriate needs. Where this is essential, staff will help a child while being accompanied by a colleague. Unless a child has a particular need, staff should not accompany children into the toilet. Staff must be made aware that this and other similar activities could be misconstrued.

Staff must be mindful of how and where they touch children, given their age and emotional understanding. Staff must avoid unnecessary or potentially inappropriate physical contact with children at all times.

Staff must ensure they have read and understood our Code of Conduct and are clear about appropriate ways to handle children/young people and deal with disciplinary matters, in line with our current guidance.

All staff working with children/young people in a paid or voluntary capacity must know what to do if they receive an allegation or if they have concerns about the behaviour of another member of staff. An allegation can be defined as where there is an accusation or suspicion that a person who works with children/young people or vulnerable adults in connection with their employment or voluntary activity have:

- behaved in a way that has harmed or may have harmed an individual
- possibly committed a criminal offence against or related to an individual
- or behaved in a way towards an individual that indicates they are unsuitable to work with children/young people or vulnerable adults.

An allegation may come directly from the individual, from the parent or carer of the individual or from another member of staff or service user.

The person who becomes aware of an allegation should treat the matter seriously and keep an open mind. They should not:

- Investigate or ask leading questions
- Make assumptions
- Promise confidentiality
- Disclose the allegation to the accused person

They should:

- Immediately report the matter to the Designated Safeguarding Lead or a deputy
- Make a written record of the information, signing and dating their record
- Assure the informant that the information will be shared on a 'need to know' basis

Concerns about staff should be treated with the same rigour as other concerns.

Once informed of the allegation the Designated Safeguarding Officer has the responsibility to inform and seek advice from the following organisations at the earliest opportunity:

- The Lambeth Local Authority Designated Officer (LADO) Andrew Zachariades on 020 7926 4679 or 07720 828 700
- Ofsted - Tel: 0300 123 1231 or enquiries@ofsted.gov.uk

The DBS (Disclosure & Barring Service) should be notified if internal investigations and disciplinary processes establish this person to be unsuitable to work with children.

The LADO and Ofsted will provide advice to the setting regarding the investigation and resolution of the allegation. Allegations should be reported to the LADO within one working day. Referrals should not be delayed to gather further information.

The LADO will advise the setting as to whether informing the parent/carer of the child/ren involved will impede the investigative or disciplinary process.

Subject to any restrictions from the LADO, the Designated Safeguarding Lead or deputy handling the allegation will inform the parent/carer of the child or young person involved that an allegation has been made if they are not already aware of the allegation.

They will reassure the parent/carer that the matter is being taken very seriously and will show them a copy of the procedures. They will ask them to keep the matter confidential while the investigation takes place and they will assure them that they will be kept up-to-date with proceedings.

Subject to any restrictions from the LADO, the Designated Safeguarding Lead or deputy handling the allegation will also inform the member of staff against whom the allegation has been made. They will advise the accused employee:

- That an allegation has been lodged against them
- Inform them of the investigation process
- Inform them of the possible outcomes if the allegation is substantiated
- Provide advice on how the employee can be supported until the matter is resolved

Refer to HR and our staffing and employment procedures for further guidance in this.

Suspension is a neutral act and it should not be automatic. It should be considered in any case where:

- There is cause to suspect a child is at risk of significant harm
- The allegation warrants investigation by the police

- The allegation is so serious that it might be grounds for dismissal

Restriction of duties and/or supervision of an employee's duties may be a sufficient response to some allegations. The possible risk of harm to children and vulnerable adults should be evaluated carefully.

The Designated Safeguarding Lead or deputy handling the investigation should record clear details regarding the allegation, advice given, actions taken, decision making process and outcomes of the allegation. The procedures should clearly state the forms and process for recording information at the setting.

The following information should be recorded as a minimum:

- The child's full name and address
- The date and time of the allegation
- Factual details of the concern, for example bruising, what the child said, who was present, etc.
- Details of any previous concerns
- Details of any explanations from the parent/carer
- Any action taken, such as speaking to the parent/carer
- A note of any action taken
- Outcome of the investigation

All records must be signed and dated

Employers must keep a clear and comprehensive summary of the allegation and its outcome on a person's confidential personnel file (held in HR). This should be kept until the person reaches normal retirement age or for ten years, whichever is longer.

Every effort should be made to maintain confidentiality while an allegation is being investigated. Apart from keeping the child, parent/carer and accused person up to date, information should be restricted to those who have a need to know to protect children or manage related employment processes.

At the end of a case in which an allegation is substantiated, a LADO will review with the Designated Safeguarding Officer whether there are any improvements that could be made to the setting to help prevent similar events in the future.

If the allegation is substantiated and the accused person dismissed the LADO should discuss with the Designated Safeguarding Lead whether a referral to the Independent Safeguarding Authority under the Vetting and Barring Act 2006 should be made. Consideration will be given as to whether the individual should be barred from, or have conditions imposed in respect of working with children, young people or vulnerable adults.

It is important that Coin Street staff, volunteers and students feel able to approach their lead officer if they have concerns about a member of staff. Should their concerns be about the lead officer they should approach the Group Director Iain Tuckett, Deputy Designated Safeguarding Lead or the Coin Street Safeguarding Trustee, Jo-Anna van der Bosch, for support and action.

Where an allegation is made against a member of staff they should contact their union or professional association without delay. In line with the Lambeth Local Safeguarding Children's Board guidance the procedures followed are detailed in the London Child Protection Procedures. In some situations, this may result in the suspension of a member of staff. Where this occurs, it must be remembered that suspension is a 'neutral act'. It will be considered where: there is cause to suspect a child or vulnerable adult is at risk of significant harm, the allegation warrants investigation by the police or, the allegation is so serious that it might be grounds for dismissal.

Every effort should be made to maintain confidentiality and guard against unwarranted publicity while an allegation is being investigated or considered.

The procedures will ensure that all parties involved in this very difficult situation will be supported, given appropriate advice and treated fairly.

Appendix 4 Our conduct in working with children and young people

The following is a guide to helping create a safe and protective culture for babies, children, young people, staff and volunteers. The principles outlined form part of the expectation of behaviour of all Coin Street staff and volunteers in all interactions with children and young people.

(For full guidance in relation to child protection procedures please refer to the Coin Street Safeguarding Policy & Procedures or speak to the Coin Street Designated Safeguarding Lead).

Practice to be encouraged:

- Treat all babies, children and young people with respect and dignity
- Positive and mindful use of language
- Involve children and young people in the decisions that affect them
- Always work in an open environment, avoiding private or unobserved situations
- Maintain a safe and appropriate distance with young people (e.g. not sharing tents, shower facilities or having an inappropriate or intimate relationship)
- Adhere to the Intimate Care guidance when working with babies, children or young people with disabilities
- When organising events or sessions for children and young people, or their attendance at events/ sessions, the following documentation should be requested by Coin Street staff in relation to each child or young person attending the activity:
 - A Consent Form for all events or specific activities;
 - Contact details for the family/guardians, including emergency contact numbers;
 - Information relating to any special issues, needs or requirements (e.g. medical, health, diet, language assistance)
 - Use a reporting form to keep a clear note of any incidents or concerns
 - If physical contact is necessary (e.g. in an emergency), tell the young person clearly what you are doing and why, seek their permission and give choices where possible. If possible have another worker present.
- Every activity, event or session should be risk assessed to maintain the safety of babies, children or young people
- When working with a mixed gender group off-site there should be access to staff/volunteers of both genders to manage sensitive activities (e.g. public toilets, intimate care)
- Adhere to Coin Street guidance on use of mobile phones and cameras

Practice to be avoided:

- Workers should not give lifts in their car to individual children or young people or travel alone with young people. Where not doing this would compromise Coin Street's Health and Safety Policy (e.g. leaving a young person alone at a venue) you should attempt to phone the parent/carer of the young person to confirm what you will be doing. You should also ask the young person to sit in the back seat.
- Workers should not take young people to their home or that of another worker
- Workers should avoid situations where they are alone with babies, children or young people. Where a private meeting with a lone child/young person is unavoidable it should be held in an open place in view of others or in a room visible to those outside and where a colleague has agreed to visually monitor the meeting. If a young person participates in a review of their involvement in a programme as a result of disruptive or unacceptable behaviour, it is advisable that this review is witnessed by a second staff member/ volunteer.
- Workers should not use their own 'personal' electronic communications (e.g. mobile phones, social networking sites) for contacting young people, unless agreed by a senior manager or director.

Unacceptable practice:

- Invading the privacy of children and young people when they are toileting or showering, changing or dressing.
- Inappropriate physical or sexually provocative games
- Sharing sleeping accommodation with an individual child or young person
- Making sexually suggestive comments about or to a child or young person, even in fun
- Inappropriate and intrusive touching of any form
- Scapegoating or ridiculing a child or young person
- Allowing inappropriate, foul, sexualised or discriminatory language to remain unchallenged
- Any form of physical punishment
- Illegal use of drugs
- Use of alcohol during an event
- Bullying of any form, including name calling or constant criticism
- 'Picking on' a young person because of their family background, manner of dress or physical characteristic
- Racism or sectarianism of any form
- Favouritism and exclusion - all young people should be equally supported and encouraged
- Abusive language or gestures

Appendix 5 Specific Coin Street policies to create a safe environment

1. Working with those who have special educational needs and disabilities (SEND)

Coin Street acknowledges that children, young people and adults with special educational needs and disabilities (SEND) can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.

Coin Street will ensure that children and adults with SEND, specifically those with communication difficulties, will be supported to ensure that their voice is heard and acted upon.

Members of staff are encouraged to be aware that children and adults with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the disability and be aware that those with SEN and disabilities may not always outwardly display indicators of abuse.

2. Use of mobile phones and cameras

Coin Street is committed to safeguarding the children and families that we work with and we are aware of the risk that mobile phone and other devices with camera functionality pose to the children in our care. It is also recognised that mobile phones can cause an unnecessary distraction during the working day and can be intrusive when used in the company of others.

We balance this risk with the benefits that mobile devices and photographs of children can offer and through observing this policy, all staff and visitors to our setting are contributing to a safe and effective environment.

Where this policy refers to mobile phones, this is also intended to cover any device which may be used to take images, including but not restricted to tablets, smart watches, cameras and recording equipment.

Within our nursery and family and children's centre

- Staff will not take either a personal or work phone, personal tablet, camera or smart phone into the nursery or play spaces within the family and children's centre. These devices will be stored in the locker provided (turned to silent) for nursery staff or in the office for family and children's centre staff.
- Staff are permitted to use their mobile phone in the staff room or in office areas on breaks or outside of working hours, when no children are present.
- Visitors to the nursery and family and children's centre include but are not limited to parents, prospective parents, contractors, early years' partners, students, local authority staff and inspectors. Upon arriving at the Nursery, all visitors will be informed by a member of staff of the policy on mobile phones and cameras and will be asked to observe the restrictions in place. Visitors will be asked to refrain from using their mobile phone whilst in the nursery or play spaces within the family and children's centre. The nursery reserves the right to view

any images that have been taken while on the premises and request that images are deleted if they are deemed inappropriate or unnecessary.

- The nursery and family and children's centre have electronic tablets for use in tracking children's progress in their learning and development within the nursery and family and children's centre. These tablets are kept securely in a locked cupboard when not in use and should not leave the building, other than for the express purpose of trips with the children. The tablets have appropriate filters in place and are used for this purpose alone.
- It is not appropriate to take photographs of bruising or injuries on a child for child protection concerns. In these cases, the body map feature on MyConcern must be used.
- Under no circumstances must a camera of any kind be used in the toilet or nappy changing areas without prior consultation with senior manager in charge of the nursery or family and children's centre.
- Photographs taken for the purpose of staff / student studies, outside agencies or promotional material will require consent by the legal guardian
- In circumstances such as outings and off-site visits, staff will agree with their manager the appropriate use of personal mobile phones in the event of an emergency.
- Where there is a suspicion that the material on a mobile phone may be unsuitable and may constitute evidence relating to a criminal offence, the allegation process will be followed, as outlined in Appendix 3.
- There is a zero-tolerance policy on this issue and any breach will result in disciplinary action being taken. All staff are responsible for the safe and proper implementation of this policy and are expected to challenge any person who is seen using their mobile phone in such a way that breaches this policy. Failure to report a breach of this policy may lead to disciplinary action.

Within our work with young people

- Staff are not permitted to use personal mobiles, at any time, when working with young people; if staff have personal mobiles with them, they must be **switched off** and remain in bags. Staff are encouraged to give their work mobile and office numbers to family members in case of emergency.
- Photographs of young people may only be taken with Coin Street work cameras unless specifically authorised to use a personal camera or phone. Photographs should be uploaded to a computer as soon as possible, and then deleted immediately from the camera.
- Staff and volunteers are not to give out their personal email addresses to young people. If on any occasion staff are required to email children and young people using their personal email address, they should use formal language to avoid any misunderstanding on the part of the recipient and should be carbon copied to the Designated Safeguarding Lead. Staff members who have concerns regarding content of an email that they send or receive from a child/young person should consult the Designated Safeguarding Lead for guidance.
- Staff and volunteers must not give out their personal mobile phone numbers to young people, have numbers from young people stored on their personal phones or text message young people from their personal phones.

3. Baby sitting and out of work hours childcare

At no time should a member of staff working within the family and children's centre or our youth and community programmes undertake babysitting or off site/ home care for any parents whose

children attend Coin Street. This is considered a breach of conduct and will constitute a disciplinary offence.

This is due to:

- A conflict of interest when a member of staff swaps roles
Being a key person is an important role where confidential information is shared. Parents need to understand that the key person role is that of the professional and that you are representing Coin Street. It is likely that this role is forgotten when outside of Coin Street and in a family home.
- Working in someone's home enables you to see a side of a family's life which is not usually accessible in the role as a child development or youth work professional

It's a difficult position to be in if you witness something that would usually cause concern in your role as a professional. We need to safeguard staff against being put into these difficult situations.
- Blurred lines of friendship/professional.
This can create difficulties if, or when, you need to have a difficult conversation with parents or carers concerning their child.
- Who takes overall responsibility for discipline in the home?
What rules do you follow - those in family and children's centre, other community directorate sessions, or the rules used at home? This can confuse the child.
- Safeguarding or accusations of criminal activities can be difficult to manage.
Staff are put in an unsafe situation and we are unable to protect them. Staff are on their own and allegations can be made with no witnesses to support either side.
- Confidentiality and possible alleged confidentiality issues.
In a home situation staff may talk freely about issues or situations in the family and children's centre or other community directorate sessions. Staff may be put in a difficult situation where they are asked something by a parent. Other parents may imply information sharing even if it has not happened.

In general staff should maintain professional boundaries at all times and should seek advice from their line manager when unsure on these issues.

4. Intimate care

The Equality Act 2010 sets out the different ways in which it is unlawful to treat someone. It is not acceptable to refuse a child admission because they are delayed in achieving continence. Children should not be excluded from normal activities solely because of incontinence, neither should they be sent home to be changed, or be required to wait for their parents or carers to arrive at the setting to change them.

Any issues should be dealt with on an individual basis. Practitioners are expected to make reasonable adjustments to meet the needs of each child.

What is intimate care?

Intimate care can be defined as care tasks of an intimate nature, associated with bodily functions, bodily products and personal hygiene. This includes nappy changing, supporting toileting, washing and dressing.

Best practice

- Any intimate care will be carried out with respect and regard to the child's right to dignity and privacy.
- Wherever possible, the child's key person will carry out this care and ensure it is used as a time for *positive shared interaction* rather than just a hurried routine.
- Children are changed/toileted according to their individual need not as a group activity
- Wherever appropriate, encourage and support children to participate in their own care.
- Suitable equipment and facilities are made available.
- Staff who provide intimate care must have completed all suitability checks including a DBS check.
- The mobile phone and camera policy are always adhered to and are forbidden in areas where intimate care is carried out.
- Staff follow procedures that consider good hygiene practice.
- Intimate personal care is discussed with parents to agree on how this is routinely carried out.
- Intimate care is logged and recorded with the date and time and by whom.
- Further consideration and risk assessment will need to be completed before any outing.

Always tell another member of staff when you are going to change or accompany a child to the toilet.

Always ensure that a child's privacy is protected, whilst ensuring that you are visible to other members of staff and follow the agreed procedures.

If a member of staff has any concerns about the behaviour of any adult, they should alert the Designated Safeguarding Lead.

If any allegations of abuse are made against any adult working at the setting the procedures for 'allegations of abuse' will be followed.

If, during intimate care, a member of staff has any concerns about physical or behavioural changes in a child's presentation, e.g. bruises, marks, soreness, bleeding, they must pass their concerns to the Designated Safeguarding Lead.

5. Physical touch

“Physical touch” is an essential part of human relationships. Within the services provided by Coin Street staff may well use touch to prompt, to give reassurance, to provide support in an activity. This guidance is put in place to allow staff to provide appropriate services confidently and safely.

It is unrealistic to suggest that staff should touch a student or service user only in emergencies. For some people touch can provide welcome reassurance or comfort in challenging or distressing circumstances. Equally touching may also be appropriate when congratulating or giving praise.

Staff must, however, bear in mind that even perfectly innocent actions can sometimes be misconstrued and must, therefore, conduct themselves accordingly, using their professional judgement.

Staff will also need to bear in mind that there may be some people for whom touching is particularly unwelcome. This may be due to their cultural background, individual sensitivities or as a consequence of having been abused. It is important that staff are aware of these issues and that the setting/section has a system to ensure staff are informed of these matters.

Coin Street endorses the appropriate and professional use of physical touch and support. However, it does not support inappropriate physical contact between staff and children, young people and adults. Staff need to ensure that any physical contact is not misinterpreted. To use touch/physical support successfully, staff will need to adhere to the following.

It must:

- be non-abusive, with no intention to cause pain or injury;
- be in the best interests of the person;
- have a clear educational or care purpose;
- be sensitive to an individual’s personal history or preferences;
- take account of a range of diversity issues such as gender and disability, culture, religion.

6. Inter-agency working

Coin Street recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance, both to ensure children’s needs are met and to protect them from harm. All staff will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals, in discussion with parents/carers as appropriate. All staff will work with social care, the police, health services, local authority and other services to promote the welfare of children and protect them from harm.

Coin Street is not the investigating agency when there are child protection concerns and we will therefore pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment processes as required and recognise that a crucial part of this may be in supporting the child while these take place.

Coin Street recognises the importance of multi-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help meetings.

Coin Street's leadership team, DSL and Deputy DSL's will work to establish strong and co-operative relationships with relevant professionals in other agencies.

7. Child on child abuse

All members of staff recognise that children, young people and vulnerable adults can abuse their peers. Child on child abuse can take many forms, including (but not limited to) bullying, cyberbullying, gender-based abuse, hazing (initiation type violence), sexually harmful behaviour and violence and YPSI (youth produced sexual imagery) .

Coin Street believes that abuse is abuse and it will never be tolerated, dismissed, minimised, or passed off as "banter" or "part of growing up". Any incidents of child on child abuse will be managed in the same way as any other child protection concern and will follow the same procedures, in accordance with Safeguarding Children Board procedures.

Coin Street is aware of the potential gender issues that can be prevalent when dealing with child on child abuse including but not limited to, being sexually touched/assaulted or being subject to initiation/hazing type violence.

Children who have been experienced child on child abuse will be supported by:

- Offering them an immediate opportunity to discuss the experience with a member of staff of their choice
- Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.
- Providing reassurance and continuous support
- Working with the wider community and local/national organisations to provide further or specialist advice and guidance

Children who are alleged to have abused other children will be helped by:

- Discussing what happened, establishing the specific concern and the need for behaviour to change
- Informing parents/carers to help change the attitude and behaviour of the child
- Providing appropriate education and support
- Taking appropriate disciplinary action.
- Speaking with police or other local services (such as early help or children's specialist services) as appropriate

8. Uncollected children

For children who are dropped off and picked up by a parent or carer if they are not collected, as expected, at the end of a session the child will be supervised by a member of staff. They will be taken to the office, or a place where the parent/carers or other person indicated on the child's emergency form are contacted by phone. Staff will stay with the child until a handover to a

parent or carer can be arranged. If this cannot be arranged, then the Lambeth duty social worker should be called on 020 7926 5555 (for activities at the Coin Street Neighbourhood Centre) or the Southwark duty social worker on 020 7525 5000 (for activities at the Colombo Centre).

For children who are consistently collected late, the appropriate member of staff may write to or invite the parent/carers for a meeting to discuss the problem.

9. Child sexual exploitation

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education

Staff will report any concerns to the DSL/Deputy DSL

Coin Street staff have been made aware of the revised definition of Child Sexual Exploitation, as issued in the Department for Education in February 2017

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Every member of staff at Coin Street recognises that children at risk of CSE need to be identified and issues relating to CSE should be approached in the same way as protecting children from other risks. They are aware that sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation may involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexting, sexual bullying including cyber bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse or recognise this as abusive.

10. Domestic abuse

The definition of domestic abuse (DA) includes, any pattern of controlling or coercive or threatening behaviour, (psychological, physical, sexual, financial or emotional) between those aged 16 or over who are or who have been intimate partners or family members regardless of gender or sexuality.

The definition of harm as amended the Adoption & Children Act 2002:
Impairment suffered from seeing or hearing the ill treatment of another' particularly in the home, even though they themselves have not been directly assaulted or abused

Coin Street recognises that DA will have an impact on aspects of a child or vulnerable adult's life. The harm suffered will vary according to the child's or adult's resilience or otherwise to his or her circumstances. We recognise that the victim's capacity to protect their child/ren is diminished through anxiety about their own circumstances.

We will allow an opportunity for the abused partner (predominantly the woman but not exclusively so) to disclose the harm. We will ensure that all information is dealt with securely and sensitively and refer the matter to children's social care where there is a child/ren at risk of significant harm and/or neglect.

11. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child or vulnerable adult's welfare. The Designated Safeguarding Lead and Deputies will be aware of the contact details and referral routes in to the Local Housing Authority to raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour as well as the family being asked to leave the property.

12. Honour Based Abuse (HBA) / Female Genital Mutilation (FGM)

'Honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and will be handled and escalated as such.

The indicators of HBA and associated factors will be covered with staff within safeguarding training. All members of staff are alert to the possibility of a child being at risk of HBA, or already having suffered HBV. All members of staff are aware that all forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. Staff will speak with DSL if they are concerned about HBA.

FGM is considered child abuse and a grave violation of the human rights of girls and women. It comprises of procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal to subject any child to FGM in the UK and to take a child abroad to undergo FGM.

Any member of staff who has an FGM concern should discuss with the DSL/Deputy DSL's who will involve the children's social care as appropriate.

Typical identifiers / triggers are:

- Family comes from a community known to practice FGM
- Family / child may ask to be excused PE / swimming on return from abroad
- Family / child may confide that she is going to a 'special ceremony' when on holiday
- Female child is known to have a sister that has already undergone FGM
- Family withdraws female child from PSHE / SRE

Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out on a child or young adult (under 18 years). The staff member discusses any such case with the DSL/Deputy DSL and involve children's social care as appropriate.

13. Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage.

If any member of staff receives a disclosure or is aware that a Forced Marriage is about to happen this must be disclosed to the DSL/Deputy DSL without delay for appropriate action to be taken. Where there is a risk that a child may be or has been taken out of the country, the school will contact the Forced Marriage Unit as well as local authority social care.

FMU contact: 020 7008 0151 or email: fm@fcdo.gov.uk

14. Extremism and radicalisation

Protecting children, young people and vulnerable adults from the risk of radicalisation should be seen as part of Coin Street's wider safeguarding duties and is similar in nature to protecting children and vulnerable adults from other forms of harm and abuse. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The internet and the use of social media has become a major factor in the radicalisation of young people.

As with other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation

From 1 July 2015, registered early years providers and schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 of the need to prevent from people from being drawn into terrorism. This duty is known as the Prevent duty.

Coin Street recognises that exposure of children (and adults) to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence. Radicalisation of young people can be compared to grooming for sexual exploitation.

Coin Street will ensure all members of staff working with children, young people and vulnerable adults undertake training which includes guidance on how to identify people who may be vulnerable to being drawn into terrorism, and how to refer them into the Channel process.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that staff can call to raise concerns about extremism with respect to a child or young person. You can also email counter.extremism@education.gov.uk Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you think someone is in immediate danger, think someone may be planning to travel to join an extremist group or see or hear something that may be terrorist-related.

15. Gangs and county lines

A gang is usually considered to be a group of people who spend time in public places that see themselves (and are seen by others) as a noticeable group and engage in a range of criminal activity and violence. They may also identify with or lay a claim over territory, are in conflict with other, similar gangs.

Here are some of the reasons young people might give for being in a gang:

- identity
- a sense of belonging
- they think it will make them safer
- they think they will make money

Bonding and group identity are an important part of social life and growing up. But when a bond is based around crime, violence is usually not far away. Children and young people involved with, or on the edges of, gangs might be victims of violence or they might be pressured into doing things like robbery or carrying drugs or weapons. They might be abused, exploited or put into dangerous situations.

'County lines' is the term used to describe the approach taken by gangs originating from large urban areas, who travel to locations elsewhere such as county or coastal towns to sell class A drugs. Gangs typically recruit and exploit children and vulnerable young people to courier drugs and cash. Typically, users ask for drugs via a mobile phone line used by the gang. Couriers travel between the gang's urban base and the county or coastal locations on a regular basis to collect cash and deliver drugs. Gangs recruit children and young people through deception, intimidation, violence, debt bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of a vulnerable adult who is unable to challenge them.

County lines cuts across several issues including: drug dealing, violence, gangs, exploitation, safeguarding, modern slavery and missing persons. It is critical that practitioners working directly with children and vulnerable adults are aware of what county lines is, how to identify those at risk or involved in county lines exploitation and what action to take. More information is available in the Home Office Guidance about County Lines

<https://www.gov.uk/government/collections/county-lines-criminal-exploitation-of-children-and-vulnerable-adults>

If you are worried about a child, young person or vulnerable adult being criminally exploited or involved in gang activity you should report this to the Designated Safeguarding Lead.

16. Private Fostering

Private fostering is an arrangement between families without the involvement of the Local Authority for the care of a child or children under the age of 16 (18 if disabled) by someone other than a parent or close relative for 28 days or more. Privately fostered children are a diverse and sometimes vulnerable group. They include:

- Children sent from abroad to stay with another family for educational purposes
- Asylum-seeking and refugee children
- Children cared for by another family due to parental ill-health
- Children of prisoners placed with distant relatives

The Designated Safeguarding Lead must notify Lambeth or Southwark Children's Social Care if they become aware of a private fostering arrangement which has not been notified to the local authority by the parents/carers or have doubts about whether a child's carers are their parents and there is evidence to support those doubts.

17. Dealing with allergies

We collect information on dietary requirements and allergies at registration and act on this information. For children with a food allergy appropriate information will be collected about the allergy and any triggers and a Health Care Plan will be written for those with us under our day care. Any change in a child's medical condition should be reported to Coin Street by the parent.

We do not guarantee an allergen free environment but we do act to minimise the risk of exposure, encourage self-responsibility and plan for effective responses to possible emergencies.

In the event of a child suffering an allergic reaction we will contact the child's parent or carer; keep calm, make the child feel comfortable and give them space; if medication is available for that specific child and permission is in place it will be administered; and should the symptoms become serious or the child become distressed we will telephone 999 and accompany the child to hospital, if parents do not arrive before the ambulance.

Further information on allergies is available in our Allergy Policy which is available separately.

Appendix 6 Coin Street E-Safety Policy & Procedures

1 Introduction

This paper has been developed to supplement our Safeguarding policies and procedures and in accordance with the Lambeth Safeguarding Children's Partnership guidance. This policy has been updated to respond to the new opportunities and risks which accompany the unprecedented and rapid change to the use of ICT in the light of COVID-19.

It is to be adopted by all staff, volunteers, students and partner agencies at Coin Street, to safeguard children, young people and vulnerable adults from the potential dangers in the online world.

It can also be used as a point of reference for children and young people, vulnerable adults, their parents/carers and those in a position of trust.

1.1 Definition of e-safety

The term e-safety is specifically defined for the purposes of this document as the process of limiting the risks to children, young people and vulnerable adults when using the internet, digital and mobile technology (IDMTs) through a combined approach to policies and procedures, infrastructures and education/training.

1.2 Statement of purpose

Coin Street's aim to ensure that all children and young people, vulnerable adults, their parents and carers and all those working with children and young people and vulnerable adults recognise the risks and potential dangers that may arise from the use of internet, digital and mobile technologies. We intend to ensure that they understand how to mitigate these risks and can recognise, challenge and respond appropriately to any e-safety concerns, to keep children and young people and vulnerable adults safe.

1.2 Context

Coin Street aim to raise awareness and educate those involved in a child / young person / vulnerable adult's welfare and development about the dangers they face in the digital world. We accept that removal or banning of access to digital technologies is not the answer but rather education around responsible use and potential dangers is the key.

For many children / young people/ vulnerable adults, the online 'virtual' world is as real to them as the 'real' world; however, the digital world needs to be seen in the same context as the real world in that it also has dangerous places which children and others would be unwise to venture into. Children/ young people/ vulnerable adults do not always recognise the inherent dangers of the internet and often do not understand that online behaviour may have offline consequences.

Despite this, digital technologies can offer children/ young people/vulnerable adults opportunities to learn and develop, communicate, be creative and be entertained. The advantages of the internet can and should outweigh the disadvantages.

Day to day dangers the virtual world can pose to children / young people/ vulnerable adults:

- Children / young people have been 'groomed' online by adults (often pretending to be other young people) with the aim of exploiting them sexually;

- Vulnerable adults can be targeted by those seeking to undertake fraud and gain access to their identity or financial details;
- Children / young people/ vulnerable adults have been bullied by others via social networking sites, websites, instant messaging and text messages. This is often known as 'cyberbullying';
- Inappropriate (i.e. threatening, indecent or pornographic) images of children and young people have been taken, uploaded and circulated via social network websites, mobile phones and video broadcasting websites such as YouTube, often by other young people. This is a criminal offence under S45 of the Sexual Offences Act 2003;
- The dangers attached to gang culture can rapidly accelerate online as many gangs 'advertise' or promote themselves via websites or social networking sites. Also threats of violence, threats to an individual's life or threats of retaliation can be posted online by opposing gang members;
- Unsuitable websites and images can be easily accessed online.

Due to the rapid advancement of digital technologies, young people experience the internet and mobile telephones as the 'norm' – in this sense children are often referred to as 'digital natives'.

Common technologies include:

- The internet
- Email
- Instant messaging
- Blogs / Twitter
- Podcasts
- Social networking sites, such as Facebook
- Location based social networking
- Video broadcasting, such as YouTube
- Chat rooms
- Video conferencing such as Zoom and Skype
- Online gaming rooms and platforms
- Music download sites
- Mobile phones with camera and video functionality (including Facetime)
- Applications

Very often children / young people's methods of communication and emotions are relayed to others via digital technology. Adults may not necessarily understand the apparent necessity for children / young people to constantly be online but should appreciate that excessive usage could impair a child's welfare or development by inhibiting real life experiences and social relationships. Parents and carers, therefore, should have some degree of control over the amount of time children / young people have access to information and mobile technology. They may also view this seemingly constant use of the internet/mobile phones as a barrier to communication rather than an aid and seek to address this.

Where children and young people are researching as part of their education, the quality of information available on the internet can be even more difficult to determine than that sourced from other mediums. It is vital that they understand that the information may not always be correct or true and importantly, that the people they encounter on the internet may not always be who they say they are. Researching potentially emotive themes such as the Holocaust, Civil Wars or Religion, etc. provides children / young people the opportunity to develop strong evaluation skills about the conflicting variety of information held on the internet – some which

undoubtedly leads to derogatory or misleading web links which may completely deny or wholly misrepresent these events.

This policy, therefore, recognises the potential dangers and risks children, young people and vulnerable adults can encounter in the online world and provides guidance on how to minimise these risks.

2 Principles and responsibilities

This policy should be cross-referenced with our safeguarding policies, as well as other relevant policies, including Code of Conduct, Acceptable use of IT, Behaviour and Disciplinary policies.

Where an individual has a concern regarding e-safety they should raise these, in line with our safeguarding procedures, with the Designated Safeguarding Team

2.1 Managing ICT Systems

Employees, volunteers, students and service users (including young people) must be aware that abuse of recognised policies and procedures could result in a withdrawal of technology provision and potential legal / disciplinary action being instigated against the perpetrator.

All users should therefore be compliant to the Acceptable Use Policy.

2.2 Filtering

Levels of internet access and supervision must be age appropriate and suitable for the environment the children / young people / vulnerable adults are attending. Filtering systems should be secure but adaptable. Older children and young people may sometimes require temporary access to a normally restricted website to carry out research for a project or study. Providing this can be justified by management, restrictions may be temporarily removed, however access should be strictly monitored.

Management should ensure that regular checks are made to ensure that filtering methods selected are age appropriate, effective and reasonable. Access to inappropriate websites should always be reported to management and any material perceived to be illegal must be reported to the Head of IT.

2.3 Email

Email is now an essential means of communication which can also be accessible via most mobile phones. A degree of responsibility must sit with children and young people since as soon as email access is permitted, it becomes very difficult to control. Restricting both incoming and outgoing email to specific addresses is possible however not always practical as email addresses and websites can easily be changed.

Email should not automatically be considered private and Coin Street reserve the right to monitor email however there will be a balance between maintaining the safety of children / young people and their rights to privacy.

Email content and tone must also be considered. Due to the impersonal nature of email, children and young people may write things or be aggressive or dismissive in tone which may be hurtful to others, even if such content or tone is not intended to be hurtful it may still be considered as cyber-bullying.

The use of common email addresses such as john.smith@lambeth.gov.uk should be avoided for children / young people as this can identify the young person and their general location. Young people should be encouraged to be creative and non-identifiable from their personal email addresses (e.g. groovejet246@yahoo.co.uk etc.).

General guidance includes:

- Children / young people should be advised not to reveal personal information about themselves or other young people via email nor ever arrange to meet strangers by email without specific permission from an adult in authority and this should always be done under supervision and preferably in a public place;
- It is prohibited to forward chain emails;
- Professionals should only communicate with young people by email if this has been agreed in advance with the child / young person, their parent/ carer and management and via equipment owned by their employer;
- Professionals should never disclose their personal email addresses to children / young people / vulnerable adults;
- Children / young people should be encouraged to inform an adult if they receive offensive or threatening email.

2.4 Mobile phones

Most young people now have access to mobile telephones which are generally perceived as essential to their day to day living and communicating. Mobiles now offer access to the internet, instant messaging, email, social networking, a camera and video facilities. They therefore pose one of the biggest online threats to young people, particularly as they can be used virtually anywhere, as a consequence without the scrutiny or supervision of their parent or carer.

Children and young people should be advised to only share mobile numbers with those known to them and ensure that electronic records (call, text and email logs) are kept of any bullying or threatening telephone calls, text messages, emails or images received which may need to be used as evidence in any police investigation. They should also be advised to be careful about accepting invitations to join location based social networking sites, that allow your location to be identified via GPS enabled phones.

For many community sessions at Coin Street, we restrict the use of mobile phones by service users (whether adult or young people) and it is vital that staff, volunteers and students are confident to challenge this if necessary.

Staff, volunteers and students should not communicate with service users by personal mobiles and only Coin Street devices should be used for sessional work or 'on call' duties, unless given specific agreement by management. In such instances, and after agreement by management, any calls made using a personal device should be made by a blocked number, so personal contact details are not visible. Keying 141 before the phone number will block the caller ID on the call you are making.

2.5 Social Networking

The internet provides ready access to online spaces and social networking sites which allow individuals to publish unmoderated content. Social networking sites such as Facebook, Twitter, chat rooms, online gaming and instant messaging can connect individuals to groups of people which may be friends in the 'virtual' world but who may have never met each other in the real world. Users can be invited to join groups and leave comments over which there may be limited or no control.

Children, young people and vulnerable adults should be encouraged to consider the associated risks and dangers related to sending or accepting friend requests and posting personal comments, inappropriate images or videos about themselves or their peers and the subsequent difficulty in removing an inappropriate image or information once published.

Children and young people should be advised against giving out any personal details or images which may identify themselves, their peers, siblings, their location or any groups, schools or organisations they attend or associate with. This includes real names, dates of birth, addresses, phone numbers, email addresses, photographs or videos, etc. This also includes any 'gangs' they may be affiliated with.

Children, young people and vulnerable adults should be advised about security and encouraged to set passwords, set private profiles, deny access to unknown individuals and instructed on how to block unwanted communications. It is also useful to note that, as the person matures they may have a greater understanding of how personal information about them can impact on their later lives (i.e. prospective employers making an online search of their name and sighting inappropriate photographs or content, etc.).

Staff, volunteers and students working in a position of trust with children / young people / vulnerable adults and their families must familiarise themselves with the risks and inappropriateness of sharing personal information via social networking sites with service users. When working for Coin Street, in either a paid or unpaid capacity, any inappropriate material posted could affect their status with the organisation and may lead to disciplinary action.

Coin Street therefore expect that staff, volunteers and students restrict access to their friends and family only and any 'friend requests' by a service user should be politely declined by explaining professional boundaries. We also ask that professionals steer clear of social networking sites that young people are known to frequent.

2.6 Video conferencing, online sessions and online lessons and using web cameras

The lockdown period led to a rapid increase in the use of online video conferencing platforms as a means of staying in touch, delivering group sessions and lessons and general communication. It is likely online sessions and video conferencing are here to stay as an integral element of core delivery and as such it is important that such communication is undertaken safely.

Video conferencing, whether in groups or on at one to one basis enables us all to converse online with each other face to face. Although the benefits include being able to see the other person / people you are conversing with, there are also dangers associated to both viewing and being viewed online by another person. These include:

- Being visibly identifiable to the other person. This can also be if anything in the background helps further identify the child / young person, such as a school badge, a certificate on a wall, a view from a window, etc.
- The child / young person / vulnerable adult does not have an image of the other person they are conversing with. Some people prefer to leave their camera off however this does mean the child / young person / vulnerable adult cannot see the person they are conversing with and the other person may not be who they say they are;

- Inappropriate or indecent images may be exchanged and recorded, and the child / young person/ vulnerable adult blackmailed into performing sexual acts online which may then be published by the perpetrator;
- The child / young person / vulnerable adult may be persuaded to participate in risky behaviours online which could put themselves at risk (i.e. encouraged to remove clothing or attempt suicide online);
- The child / young person / vulnerable adult may witness the other person performing an indecent or upsetting act;
- The child / young person / vulnerable adult can be 'groomed' online and encouraged to meet up with the other person;
- Children / young people have instant access to websites which offer random webcam chat with strangers.

In order to address these risks it is suggested the following is adhered to (in a Coin Street context where we are running online sessions, and as a set of guidelines for other forms of online video conferencing children/ young people and vulnerable adults join in with):

- Any computers used should be in appropriate areas, for example, not in bedrooms; staff need to be mindful that backgrounds do not compromise personal confidentiality;
- Staff and children and young people must wear suitable clothing, as should anyone else in the household;
- Language must be professional and appropriate, including any family members in the background;
- Staff must only use platforms specified by Coin Street to communicate with service users;
- Meeting IDs and passwords should be made available to any meeting participants who are booked to attend only and should not be shared further or published online. This is important to avoid "zoom bombing" and unwanted visitors coming into the space, with the potential of their sharing unwanted images or language;
- Consider activities carefully when planning – online access within Coin Street has internet content filtering systems in place that are unlikely to be replicated in the home environment;
- Be careful that those on the call (whether staff or participants) don't incur surprising costs, e.g. mobile data access charges where video utilises significant amounts of data.

2.7 Staff working offsite and working from home

Whilst staff are interacting with children / young people / vulnerable adults away from the workplace they must continue to adhere to Coin Street policies and procedures. If staff members are accessing contact details of service users at home, they must comply with the Data Protection Act 2018.

2.8 Reporting concerns

Communicating online may allow you a view into a child/ young person/ vulnerable adult's world that you would not have seen before. This may also generate some safeguarding concerns for that person. It is important that all staff who interact with children, young people and vulnerable adults, including online, continue to look out for signs that an individual may be at risk. Any such concerns should be acted on by flagging this up to one of the Safeguarding Team who will act on this in the appropriate manner.

Appendix 7 Coin Street Anti-Bullying and Harassment Policy

"At Coin Street, we value and celebrate our diverse team and community. We are respectful of each other and value our similarities and differences. We want others to do the same and have a zero tolerance towards any behaviour that aims to discriminate, prejudice, bully or harass our staff"

(statement agreed by Coin St staff team in February 2022)

1. Policy overview

1.1 Introduction

- 1.1.1 We believe that having a culture that is diverse, equitable and inclusive is core to everything that we strive to achieve and to the organisational environment we wish to protect. We do a lot to support our inclusive culture and you can read more about this in our Equality, Diversity and Inclusion (EDI) policy.
- 1.1.2 One key to protecting our culture and our people is seeking to eradicate bullying or harassment at work. This policy supports this aim by setting out the steps we will take to investigate and deal with complaints of bullying or harassment, and how we support those affected.
- 1.1.3 The policy accompanies our Equality, Diversity and Inclusion (EDI) policy.

1.2 Scope

- 1.2.1 This policy applies to anyone working for us. This includes employees, workers, contractors, volunteers, interns and apprentices. The policy also relates to job applicants, and is relevant to all stages of the employment relationship. The policy also applies to bullying or harassment by third parties.

1.3 Our commitment to you

- 1.3.1 We believe that a culture of equality, diversity and inclusion not only benefits our organisation but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong.
- 1.3.2 We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying or victimisation.
- 1.3.3 A toxic workplace culture, where bullying or harassment is tolerated, is harmful to the wellbeing of the workforce as well as the wider organisation.
- 1.3.4 We therefore adopt a zero-tolerance approach to instances of bullying or harassment.

1.4 What we expect from you

- 1.4.1 We expect you, and every one of our people, to take personal responsibility for observing, upholding, promoting and applying this policy. Whatever your job is, this is part of your role.
- 1.4.2 Any dealings you have with third parties, including customers, suppliers, contractors, agency staff and consultants, must be free from discrimination, harassment, victimisation or bullying. (For more information on discrimination and victimisation, please refer to our Equality, diversity and inclusion (EDI) policy.)

- 1.4.3 If any of our people is found to have committed, authorised or condoned an act of bullying or harassment, we will take action against them (for those to whom it applies) under our Disciplinary procedure, up to and including dismissal.
- 1.4.4 There is no justifiable reason to bully or harass someone else. For example, observing a particular religion is not a legitimate reason for bullying or harassing a colleague because of their sexual orientation. Even if you do not intend to bully or harass someone else, this does not legitimise your behaviour as it is the impact on the recipient that is important.
- 1.4.5 You should be aware that you can be personally liable for harassment.
- 1.4.6 If you experience bullying or harassment, we encourage you to speak up without delay and to ask for appropriate support (see Section 3).

2. Definitions

2.1 Who is protected from harassment

2.1.1 The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race;
- religion or belief;
- sexual orientation; and
- age.

2.1.2 Although pregnancy and maternity and marriage and civil partnership are not specifically protected under the legal provisions on harassment, we consider harassment on any ground to be unacceptable.

2.2 Meaning of harassment

2.2.1 Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of: violating someone else's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

2.2.2 Harassment can occur where someone perceives another person to have a protected characteristic, for example a perception that someone is transgender even if they are not.

2.2.3 Harassment can also arise by association, where someone is harassed because they are associated with someone with a protected characteristic, for example having a family member of a particular religion.

2.3 Examples of harassment

2.3.1 Harassment can occur in many forms, and can take place either at work or outside work. While this is not an exhaustive list, examples include:

- "banter", jokes, taunts or insults that are sexist, racist, ageist, transphobic, homophobic or derogatory against any other protected characteristic;
- unwanted physical behaviour, for example, pushing or grabbing;

- excluding someone from a conversation or a social event or marginalising them from the group;
- derogatory comments about pregnancy, maternity leave or IVF treatment;
- mimicking or making fun of someone's disability;
- derogatory or offensive comments about religion;
- unwelcome comments about someone's appearance or the way they dress that is related to a protected characteristic;
- "outing" (ie revealing their sexual orientation against their wishes), or threatening to "out", someone;
- consistently using the wrong names and pronouns following the transition of a person's gender identity;
- displaying images that are racially offensive; and
- excluding or making derogatory comments about someone because of a perceived protected characteristic, or because they are associated with someone with a protected characteristic.

2.4 **Meaning of sexual harassment**

2.4.1 Harassment may be sexual in nature. The law defines sexual harassment as:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

2.5 **Examples of sexual harassment**

2.5.1 Sexual harassment can occur in many forms. While this is not an exhaustive list, examples include:

- physical conduct of a sexual nature, unwelcome physical contact or intimidation;
- persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions;
- showing or sending offensive or pornographic material by any means (eg by text, video clip, email or by posting on the internet or social media);
- unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults;
- offensive comments about appearance or dress, innuendo or lewd comments;
- leering, whistling or making sexually suggestive gestures; and
- gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.

2.6 **Bullying**

2.6.1 There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

2.6.2 Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online (cyber-bullying) or on social media. Bullying may occur at work or outside work.

2.6.3 If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful (see Harassment).

2.7 Examples of bullying

2.7.1 While this is not an exhaustive list, bullying may include:

- physical, verbal or psychological threats;
- excessive levels of supervision; and
- inappropriate and derogatory remarks about a person's performance.

2.7.2 It is important to understand that legitimate, reasonable and constructive criticism of a person's performance or behaviour, or reasonable instructions given to people in the course of their employment, will not of themselves amount to bullying.

2.7 Microaggressions

2.8.1 Microaggressions - sometimes called micro-incivilities - are statements, actions, or incidents that are regarded as indirect, subtle, or unintentional discrimination against members of a marginalised group such as a racial or ethnic minority. They are sometimes referred to as "death by a thousand cuts". Microaggressions generally take one of three forms:

- Micro-assaults: Conscious and obvious insults made verbally or non-verbally to a marginalised individual or group, for example directing limp-wristed hand gestures towards a gay colleague and saying "It's just a joke".
- Micro-insults: Unintentionally insensitive remarks or assumptions based on stereotypes, for example saying to a person with a disability "You don't look disabled to me".
- Micro-invalidations: Where a person denies, or seeks to cancel, the feelings and lived experiences of a marginalised individual or group, for example a white person saying "I don't think the UK has a problem with racism - some people are just too sensitive".

2.8.2 Serious microaggressions can amount to unlawful harassment, bullying or discrimination but even less serious microaggressions can negatively impact the health and wellbeing of the person experiencing them.

3. What to do if you are being bullied or harassed

3.1 Informal route

Bully/harasser is a colleague

3.1.1 If you feel able to, you may decide to raise the issue with the individual themselves, to make clear that their behaviour is not welcome and to ask them to stop. They may not be aware that their behaviour is offending you.

3.1.2 Alternatively, if you do not feel up to speaking directly to the individual, you may consider asking your manager, a colleague, or People & Team Building for support

3.1.3 You may or may not want them to talk to the individual on your behalf and, where possible, we will respect your wishes. However, if the welfare or safety of you or others is at risk or where your allegations are particularly serious, we may have to approach the individual and instigate a formal investigation. In such a case we will, where possible, discuss this with you first.

3.1.4 If you would prefer not to discuss the issue with anyone at work, help and support is also available through our employee assistance programme (EAP). You can use our EAP to

Speak to an independent adviser on a confidential basis about any issue that is troubling you. See Section 4.1 for details of how to access our EAP.

Bully/harasser is a third party

If you are experiencing bullying or harassment by a third party, for example a client or a supplier, we encourage you to report this to your manager or the People & Team Building team without delay so that they can advise and support you on the best course of action.

3.2 Formal route

- 3.2.1 If you are not happy with the outcome of an informal process, or if you feel it is not appropriate to approach the issue informally, you may decide to raise it formally.
- 3.2.2 To make a formal complaint, you should discuss this first with your line manager. If your complaint is about your line manager, you should raise this with the Head of People & Team Building.
- 3.2.3 While you can raise a formal complaint of bullying or harassment under our Resolution and Grievance procedure, you may prefer to do so under this policy because it is specifically aimed at dealing with such issues. You should be aware that you cannot raise a complaint under this policy if you have raised a complaint about the same issue already under the Resolution and Grievance procedure.
- 3.2.4 Under the formal procedure within this policy, we will usually:
 - ask you to set out your complaint in writing and include as much detail as possible, for example the alleged bully/harasser's name, the nature of the bullying/harassment, the dates of the alleged acts of bullying/harassment, names of any witnesses, and details of any action taken to address the matter so far;
 - hold a meeting with the alleged bully/harasser to ascertain their response to the allegations;
 - carry out further investigations where necessary, including interviewing potential witnesses who we will instruct to keep the matter confidential;
 - invite you to a meeting to discuss your complaint in full and where you will have the right to be accompanied by a colleague or trade union representative;
 - hold a meeting with you to enable us to ask you further questions in light of any information we have gathered from the alleged bully/harasser and/or witnesses;
 - consider all the evidence in full and make a decision; and
 - inform you of our decision and, if we uphold the complaint, instigate disciplinary action up to and including dismissal against the bully/harasser.
- 3.2.5 We will investigate fully every formal complaint in an objective and confidential way, while also ensuring that we respect your rights as well as the rights of the alleged bully/harasser.
- 3.2.6 We will use every effort to complete an investigation into bullying or harassment as quickly as possible.
- 3.2.7 Where the alleged bully/harasser is a third party, we may need to adjust the procedure under this policy to ensure we conduct appropriate investigations and we will discuss this with you.

3.3 Appeals

- 3.3.1 If you are not satisfied with the outcome of the formal investigation, you have the right to appeal.

- 3.3.2 Should you wish to appeal, you should write to People & Team Building team setting out what aspects of the decision you are unhappy with and the reasons why. Appeals should be submitted without unreasonable delay and usually no longer than five working days after we inform you of the decision.
- 3.3.3 The Head of People & Team Building will arrange a meeting for you with a more senior manager (usually a director) to discuss your appeal in full and to try and reach a satisfactory solution. You must take all reasonable steps to attend this meeting and you may be accompanied by a colleague or trade union representative.
- 3.3.4 The Director will write to you to confirm the outcome of the appeal, which will be final.

4. Additional information

- 4.1 Support for those affected or involved
 - 4.1.1 We understand that anyone affected by, or involved with, a complaint of bullying or harassment may feel anxious or upset and we will do what we can to support you.
 - 4.1.2 If you feel you cannot continue to work in close contact with the alleged bully/harasser, we will consider seriously any requested changes to your working arrangements during our investigation into the matter.
 - 4.1.3 For emotional support, you can access free, confidential counselling from our EAP. To access the EAP website, go to our Benefits Platform (Smart Hive) via the Intranet to be redirected
 - 4.1.4 Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. If you feel you have suffered such victimisation, please inform your Divisional Director or People & Team Building team as soon as possible.
 - 4.1.5 Regardless of the outcome of your complaint, we will consider carefully how to best approach any ongoing working relationship between you and the individual concerned. For example, depending on the specific circumstances, we may consider amending the job duties, location or reporting lines of either you or the other person. Alternatively, we may decide workplace mediation or counselling is appropriate.

4.2 Sensitivity and confidentiality

- 4.2.1 Anyone involved with an informal or formal complaint about bullying or harassment, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties.
- 4.2.2 If you are found to have breached confidentiality or acted without due care or sensitivity in a case of bullying or harassment, we may take disciplinary action against you up to and including dismissal (or other appropriate action for non-employees).
- 4.3 Consequences of breaching this policy
 - 4.3.1 If, following a formal investigation, we find that you have committed, authorised or condoned an act of bullying or harassment, we will deal with the issue as a possible case of misconduct or gross misconduct.
 - 4.3.2 We may take disciplinary action against you, up to and including dismissal (or other appropriate action for non-employees). Please refer to our Disciplinary procedure for further information.
 - 4.3.3 Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. If we find that you have victimised anyone in this way, we will instigate disciplinary action against you up to and including dismissal (or other appropriate action for non-employees) under our Disciplinary procedure.

4.4 Training

- 4.4.1 All new starters must undertake equality, diversity and inclusion training as part of their induction programme.
- 4.4.2 Every current employee must attend regular equality, diversity and inclusion training on at least a three year basis.
- 4.4.3 We expect all our people to proactively support our equality, diversity and inclusion initiatives by attending events and workshops organised Coin Street to educate themselves on the challenges faced by others and how to help alleviate these in the workplace.

4.5 Record-keeping

- 4.5.1 We process personal data collected in relation to bullying or harassment complaints in accordance with our data protection policy. In particular, data collected in relation to the investigation of bullying or harassment complaints is held securely and accessed by, and disclosed to, individuals only for the purposes of responding to the complaints and conducting an investigation. You should immediately report any inappropriate access or disclosure of employee data in accordance with our Data protection policy as this constitutes a data protection breach. It may also constitute a disciplinary offence, which we will deal with under our disciplinary procedure.

4.6 Monitoring and review

- 4.6.1 We analyse data around allegations of bullying or harassment (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our wider equality, diversity, and inclusion strategy.

5. Related Documents

- Equality, Diversity and Inclusion Policy
- Resolution & Grievance Procedures
- Disciplinary Policy & Proced

Appendix 8 Helpline Directory

Addiction & Drugs		
National Association for Children with Alcoholics	www.nacoa.org.uk	0800 358 3456
National Gambling Helpline (run by GamCare)	www.gamcare.org.uk	0808 8020 133
FRANK (information about drugs and addiction)	www.talktofrank.com	0300 123 6600
Bereavement		
Childhood Bereavement Network	www.childhoodbereavementnetwork.org.uk	
Child Death Helpline	www.childdeathhelpline.org.uk	0800 282 986 / 0808 800 6019
Winston's Wish	www.help2makesense.org	08088 020 021
Hope Again	www.hopeagain.org.uk	0808 808 1677
Cruse Bereavement Care	www.cruse.org.uk	0808 808 1677
Grief Encounter	www.griefencounter.org.uk	0808 802 0111
Bullying		
Anti-Bullying Alliance	www.anti-bullyingalliance.org.uk	
Bullying UK	www.bullying.co.uk	0808 800 2222
National Bullying Helpline	www.nationalbullyinghelpline.co.uk	0845 22 55 787
Ditch the Label	www.ditchthelabel.org	01273 201 129
Cancer		
Macmillan Cancer Support	www.macmillan.org.uk	0808 808 00 00
Cancer Research UK	www.cancerresearchuk.org	0808 800 4040
Children of Prisoners		
National Information Centre on Children of Offenders	www.nicco.org.uk	
National Prisoners' Families Helpline	www.prisonersfamilies.org	0808 808 2003
Children (general)		
Childline	www.childline.org.uk	0800 1111
NSPCC	www.nspcc.org.uk	0808 800 5000
Crime		
Crime Stoppers	https://crimestoppers-uk.org	0800 555 111
Victim Support	www.victimsupport.org.uk	0808 1689 111
Domestic Abuse		

National Domestic Violence Helpline	www.nationaldomesticviolencehelpline.org.uk	0808 2000 247
National LGBT+ Domestic Abuse Helpline	www.galop.org.uk	0800 999 5428
Mankind (for male victims of domestic violence)	www.mankind.org.uk	01823 33 4244
Elder Abuse		
Action for Elder Abuse	www.elderabuse.org.uk	080 8808 8141
The National Careline	www.thenationalcareline.org	0800 0699 784
Faith		
Muslim Youth Helpline	www.myh.org.uk	0808 808 2008
Female Genital Mutilation		
Daughters of Eve	www.dofeve.org	
Forward UK	www.forwarduk.org.uk	0208 960 4000
NSPCC FGM Helpline	www.nspcc.org.uk	0800 028 3550
Forced marriage & honour based violence		
Karma Nirvana	www.karmanirvana.org.uk	0800 5999 247
Housing		
Shelter	https://england.shelter.org.uk	0808 800 4444
Human Trafficking		
Salvation Army	www.salvationarmy.org.uk/modern-slavery	0300 3038 151
Modern Day Slavery Foundation	www.modernslaveryhelpline.org	0800 0121 700
LGBTQ		
Switchboard	https://switchboard.lgbt	0300 330 0630
Stonewall	www.stonewall.org.uk	0800 050 2020
LGBT Foundation	https://lgbt.foundation	0345 3 30 30 30
FFLAG (Families and Friends of Lesbians and Gays)	www.fflag.org.uk	0845 652 0311
National Trans 24 Helpline	www.lgbtconsortium.org.uk	0844 358 3204
Mermaids (transgender youth)	www.mermaidsuk.org.uk	0808 801 0400
Looked after young people and care leavers		

Coram Voice	https://coramvoice.org.uk	0808 800 5792
Become (for children in care and young care leavers)	www.becomecharity.org.uk	0800 023 2033
Mental health		
Anna Freud National Centre for Children and Families	www.annafreud.org	
Anxiety UK	www.anxietyuk.org.uk	03444 775 774
Beat Eating Disorders	www.beateatingdisorders.org.uk	0808 801 0677
Bipolar UK	www.bipolaruk.org	0333 323 3880
Campaign Against Living Miserably	https://thecalmzone.net	0800 58 58 58
Kooth (online mental health services)	www.kooth.com	
National Self Harm Network	www.nshn.co.uk	
OCD Action	www.ocdaction.org.uk	0845 390 6232
OCD UK	www.ocduk.org	
Papyrus (prevention of young suicide)	https://papyrus-uk.org	0800 068 4141
Rethink Mental Illness	www.rethink.org	0300 500 0927
Samaritans	www.smaritans.org	116 123
SANEline	www.sane.org.uk	0300 304 7000
Selfharm UK	www.selfharm.co.uk	
Young Minds	https://youngminds.org.uk	0808 802 5544 (parents helpline only)
Migrant children		
Migrant Children's Project (Coram)	www.coram.org.uk	
Online safety		
National Professionals Online Protection Centre	www.saferinternet.org.uk	0345 381 4772
Childnet	www.childnet.com	
Child Exploitation and Online Protection (CEOP)	www.ceop.police.uk	
Young People		
The Mix (across the board for under 25s)	www.themix.org.uk	0808 808 4994