

Pippa's Guardians Safeguarding Policy Academic Year September 2021-22

Key Contacts

Role	Name	Contact number
Pippa's Guardians Designated Safeguarding Lead	Imogen Trevethan	01684 252757 07593 443685
Pippa's Guardians Deputy Designated Safeguarding Lead	Ben Hughes (if the Designated Safeguarding Lead is unavailable)	07714 034749
Emergency Phone cover - Pippa's Guardians Staff Member on a rotational basis	Ann Johnson Sally Tyler Short Kay Adye	24hr Emergency Number is 07721 372865
Worcestershire Safeguarding Children Partnership (WSCP) Board Contact	Worcestershire LADO's (Local Authority Designated Officer) is John Hancock. In his absence there will be a Duty Lado (same contacts)	John Hancock 01905 846221 lado@worcschildrensfirst.org.uk

1 Introduction

This policy is addressed to all Pippa's Guardians (the **Guardianship Organisation**) staff, host family members, parents and students. It is distributed to all new staff members on commencement of their employment and is signposted to all Host Families on completion of their successful application with us. It is also available at any time on our website at www.pippasguardians.co.uk under the UK Guardianship tab.

This policy is in line with the requirements of the Association of Education and Guardianship of International Students ([AEGIS](#)) and [National Minimum Boarding Standards](#).

2 Policy statement

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has a role to play in safeguarding children. In order to fulfil this responsibility effectively, Pippa's Guardians requires all staff and host family members to make sure their approach is always a child-centred one. This means that they should consider, at all times, what is in the best interests of the child.

No individual can have a full picture of a child's needs and circumstances. If children are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy should be used read in conjunction with the following documents which can all be found on the Gov.Uk website under the Safeguarding heading.

- Working Together to Safeguard Children July 2018
- Keeping Children Safe in Education September 2021 - in particular Part One Safeguarding Information for all staff
- What to do if you are worried if a child is being abused March 2015

The Pippa's Guardians Missing Student, E-Safety, Prevent and Whistleblowing Policies can all be found at www.pippasguardians.co.uk under the UK Guardianship tab and it is important that these policies are read carefully and in conjunction with this Safeguarding Policy.

Alternatively, these documents can be provided to you by us in hard copy if preferred and requested;

A glossary of safeguarding terms can be found at the end of this document for your information. Please do contact one of our Safeguarding Team if you require any additional clarification on anything contained within this policy.

Every student should feel safe and protected from any form of abuse which, in this policy, means any kind of neglect, non-accidental physical injury, sexual exploitation or emotional ill-treatment. Pippa's Guardians is committed to safeguarding and promoting the welfare of children and young people and expects all staff and host families to share this commitment

2.1 Pippa's Guardians will:

- 2.1.1 treat all students with care and respect according to their needs and without discrimination of any kind;
- 2.1.2 provide Pippa's Guardians staff members with safeguarding training, which will include clarification of their safeguarding responsibilities. Training will be reviewed and renewed at least every three years or more frequently if required.
- 2.1.3 provide all host families with copies of this Safeguarding Policy and access to an online Safeguarding course from late 2021
- 2.1.4 be alert to signs of abuse within Pippa's Guardians, the host family environment or within the school or college attended by the student;
- 2.1.5 deal in a timely and appropriate manner with every suspicion or complaint of abuse;
- 2.1.6 work closely with all agencies and bodies concerned with the protection and welfare of children and any school or college attended by the student to ensure that all allegations of abuse are dealt with justly and promptly;
- 2.1.7 follow the local procedures for the Safeguarding Partners (previously LSCB's) in the area where the child is resident should this be necessary. Each Safeguarding Partnership and board can differ in the way they work and full information can be found on the Local Authority website. The following [link](#) will take you through to a comprehensive list of all UK Safeguarding Partnerships and their contact details;
- 2.1.8 ensure that, so far as possible, actions taken to protect a student, do not in themselves cause the student unnecessary distress. Such actions may include consultation with the police, which may result in criminal proceedings;
- 2.1.9 ensure that it practises safer recruitment in checking the suitability of staff and host families to work with children and young people in accordance with the guidance given in the current edition of Keeping Children Safe in Education September 2021. Safer Recruitment of Host Families training is delivered to all Pippa's Guardians staff at their induction and on an ongoing basis.

3 Designated Safeguarding Staff

- 3.1 Imogen Trevethan has been appointed the Designated Safeguarding Lead (**DSL**) for Pippa's Guardians. The DSL has overall responsibility for safeguarding at Pippa's Guardians. The Designated Safeguarding Lead can be contacted on 01684 252757 or 07593 443685. In the event that the DSL is not contactable or available the Deputy Designated Safeguarding Lead (**DDSL**) Ben Hughes is on 07714 034749 or 01684 252757 or failing contact with the DDSL the 24hr Emergency Phone number for Pippa's Guardians is 07721 372865. The member of staff holding this Emergency Phone will make contact as soon as is possible with the DSL to inform her of any situation. Parents are welcome to approach the DSL or the DDSL if they have any concerns about the welfare of any child in the care of Pippa's Guardians, whether these concerns relate to their own child or any other. Imogen Trevethan and Ben Hughes are both DSL trained and in line with current guidance undergo DSL training every two years. In addition, Pippa's Guardians have several additional staff members including those on the emergency phone rota that are DSL trained and these staff also undergo refresher DSL training every two years.

- 3.2 The main responsibilities of the Designated Safeguarding Lead (or the Deputy Designated Safeguarding Lead in her absence) are:
- 3.2.1. to advise and act upon all suspicion, belief and evidence of abuse reported to them and to refer cases of suspected abuse to the correct Local Safeguarding Partners as required. Pippa's Guardians maintain an excellent working relationship with John Hancock, the Worcestershire LADO and commit to continuing this partnership.
 - 3.2.2 to support staff who make referrals to Local Safeguarding Partners as in cases where the DSL or DDSL are unavailable. Staff must make direct contact where appropriate with the local Safeguarding Partners as a delay could put a child or young person at further risk of harm. Contact with the local Safeguarding Partners is made via the telephone numbers available on the Local Authority website or contact details through this [link](#)
 - 3.2.3 to be the first point of contact for Pippa's Guardians staff, host families, parents, students, and external agencies in all Safeguarding matters.
 - 3.2.4 act as a source of support, advice and expertise for staff.
 - 3.2.5 liaise with staff on safeguarding matters when deciding whether to make a referral by liaising with relevant agencies.
 - 3.2.6 to co-ordinate Safeguarding procedures within Pippa's Guardians.
 - 3.2.7 to maintain an ongoing training programme for all Pippa's Guardians staff and our approved host families.
 - 3.2.8 to monitor the keeping, confidentiality and storage of records in relation to Safeguarding.
 - 3.2.9 to liaise as necessary with relevant local agencies and the Designated Safeguarding Leads appointed by the schools or colleges attended by our students.
 - 3.2.10 to keep parents/ guardians informed of action to be taken under these procedures in relation to their child in consultation with the school or college and relevant local agencies.
 - 3.2.11 where appropriate, to take part in child protection conferences or reviews.
 - 3.2.12 refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
 - 3.2.13 refer cases where a crime may have been committed to the Police as required.
 - 3.2.14 liaise with the head teacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
 - 3.2.15 refer cases to the Channel programme where there is a radicalisation concern as required.
 - 3.2.16 support staff who make referrals to the Channel programme.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by, identifying individuals at risk, assessing the nature and extent of that risk and developing the most appropriate support plan for the individuals concerned. Channel may be appropriate for anyone who is vulnerable to being drawn into any form of terrorism. Channel is about ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist activity

- 4** Modified Safeguarding information sheets that have been designed to be read by our students are on pages 27-29 inclusive of this policy. These sheets have also been incorporated into the Student Handbook and this is provided to all new students joining Pippa's Guardians. These sheets also detail the 24 hours 7 days a week emergency number should they wish to speak to someone from Head Office and the telephone number and email address of their Area Manager as an alternative means of contacting a member of staff with any concerns or issues they may have.

Duties of staff and host families

- 4.1** Each member of staff and host family members must:
- 4.1.1** Do everything reasonable within the definition of your job role to keep children safe
 - 4.1.2** be aware of Pippa's Guardians Safeguarding Policy and follow advice and procedures contained within this policy.
 - 4.1.3** Report any matters of concern to the Designated Safeguarding Lead as soon as is practically possible. Keep a comprehensive and concise record of any significant complaint, conversation or event and written reports and all correspondence should be shared with the DSL or DDSL so that this information can be filed appropriately.
 - 4.1.4** each staff member must undertake appropriate safeguarding training, including refresher training, at regular intervals. Current AEGIS minimum guidelines suggest this is refreshed every three years.

5 Staff-student and host family-student contact

- 5.1** Staff and host families will endeavour to keep physical contact with the student to a minimum and should consider the following guidelines: These guidelines are covered in the Host Family Handbook which is given to all host families on completion of the successful application to Pippa's Guardians.
- 5.1.1** the physical integrity of the students must be respected at all times. Staff and host family members may not engage in inappropriate physical contact of any kind.
 - 5.1.2** under no circumstances may a staff or host family member give tobacco or drugs to students. Alcohol may only be given, in moderation, at times specified by and with permission from parents or guardians and in accordance with the law restricting the sale, supply and consumption of alcohol.
 - 5.1.3** staff and host family members will prudently avoid situations in which they are alone with students in rooms or areas which are locked or made inaccessible to others.
 - 5.1.4** student's bedroom must always be regarded as private space and staff or host family members may never visit a student in his or her bedroom or dormitory except when exercising specific responsibilities or as a duty of care. In this case, doors should be left ajar or another host family member made aware of the course of action being followed.
 - 5.1.5** staff involved in transporting students will exercise prudence if transporting students individually and where possible, it is sensible to ask the student to travel in the back seat of the car.

6 Abuse

- 6.1 "Abuse" includes any form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. Abuse can include:
- 6.1.1 physical abuse, for example beating or punching;
 - 6.1.2 emotional abuse, for example rejection and denial of affection;
 - 6.1.3 sexual abuse, for example sexual assault or encouraging a child to view pornographic material;
 - 6.1.4 neglect, for example failure to provide appropriate care including warmth or medical attention.

7 Signs of abuse

- 7.1 Government advice *What to do if you're worried a child is being abused* gives the following examples as potential indicators of abuse or neglect:
- 7.1.1 Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
 - 7.1.2 Children with clothes which are ill-fitting and/or dirty and/or with consistently poor hygiene;
 - 7.1.3 Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
 - 7.1.4 Children who don't want to change clothes in front of others or participate in physical activities;
 - 7.1.5 Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
 - 7.1.6 Children who talk about being left home alone, with inappropriate carers or with strangers;
 - 7.1.7 Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
 - 7.1.8 Children who are regularly missing from school or education;
 - 7.1.9 Children who are reluctant to go home after school;
 - 7.1.10 Children with poor school attendance and punctuality, or who are consistently late being picked up;
 - 7.1.11 Parents who are dismissive and non-responsive to practitioners' concerns;
 - 7.1.12 Parents who collect their children from school when drunk, or under the influence of drugs;
 - 7.1.13 Children who drink alcohol regularly from an early age;
 - 7.1.14 Children who are concerned for younger siblings without explaining why;
 - 7.1.15 Children who talk about running away and/or children who shy away from being touched or flinch at sudden movements.

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. N.B: Some situations where children stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

Physical Abuse Indicators may include the following (this is not designed to be used as a checklist)

- Patterns of bruising; inconsistent account of how bruising or injuries occurred
- Finger, hand or nail marks, black eyes
- Bite marks
- Round burn marks, burns and scalds
- Lacerations, wealds
- Fractures
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional Abuse Indicators may include the following (this is not designed to be used as a checklist)

- Over-reaction to mistakes, continual self-deprecation
- Delayed physical, mental, emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Masturbation, Appetite disorders - anorexia nervosa, bulimia
- Soiling, smearing faeces, enuresis

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Sexual Abuse Indicators may include the following (this is not designed to be used as a checklist)

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate.
- Thrush, Persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusually compliant
- Regressive behaviour, Enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises, scratches in genital area

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Indicators of Neglect may include the following (this is not designed to be used as a checklist)

- Hunger, tiredness or listlessness
- Child dirty or unkempt
- Poorly or inappropriately clad for the weather
- Poor school attendance or often late for school with poor concentration
- Affection or attention seeking behaviour
- Untreated illnesses/injuries
- Pallid complexion
- Stealing or scavenging compulsively
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Neurotic behaviour

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power, sexual gratification 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 doesn't 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.

Indicators of Child sexual exploitation may include the following (this is not designed to be used as a checklist)

- 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 don't take part in education

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: Psychological, physical, sexual, financial and emotional.

Where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships.

This definition, which is not a legal definition, includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

Schools and Host Families are ideally placed to offer appropriate support, alongside other agencies, whether families are in crisis, or whether there are early signs of potential abuse.

Helplines: <http://www.nationaldomesticviolencehelpline.org.uk>

Advice: <http://www.nhs.uk/Livewell/abuse/Pages/domestic-violence-help.aspx>

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse>

'Honour' based violence encompasses crimes which have been committed to protect or defend the honour of the family and or the community, including Female Genital Mutilation, forced marriage and practices such as breast ironing. Pippa's Guardians recognises that all cases of honour based violence fall under the safeguarding and child protection umbrella and will be treated accordingly.

Peer on peer abuse can manifest in many different ways, including but not limited to on-line bullying, sexting, banter, initiation rituals and inappropriate or harmful sexualised behaviours. In most instances, the conduct of children and young people towards each other will be covered by the school behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Pippa's Guardians recognise that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'. The forms of peer on peer abuse are outlined below.

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- Serious Youth Violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19 i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.

The term peer-on-peer abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences. There are also different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence). Research indicates that young people rarely disclose peer on peer abuse and that if they do, it is likely to be to their friends. Therefore, we will also look to help educate children and young people that we work with about how to support their friends if they are concerned about them, that they should talk to a trusted adult or someone at their school and what services they can contact for further advice.

Any concerns, disclosures or allegations of peer on peer abuse in any form should be referred to the Designated Safeguarding Lead. Where a concern regarding peer on peer abuse has been disclosed to the DSL, advice and guidance will be sought from Children's Services and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

Sexting is the sending of an indecent image and can be illegal. A person under 16 is committing an offence if they send an indecent image of themselves and someone passing this on is also distributing an indecent image of a child. Pippa's Guardians seeks to protect children from sexting and the significant impact it can have.

Advice for children and young people is available at:

<http://www.thinkuknow.co.uk>

<https://www.childline.org.uk/explore/onlinesafety/pages/sexting.aspx>

Advice for adults involved in the safeguarding of Young People is available at:

<https://www.nspcc.org.uk/keeping-children-safe/>

Radicalisation is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups. The process of radicalisation is different for every individual and is a process, not a one-off event. It can take place over an extended period or within a very short time frame. It is important that staff and volunteers are able to recognise possible signs and indicators of radicalisation.

Children and young people may be vulnerable to exposure or involvement with groups or individuals who advocate violence as a means to a political or ideological end. They can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include family members or friends, direct contact with members' groups and organisations or, increasingly, through the internet, including through social media sites. This can put children and young people at risk of being drawn into criminal activity and has the potential to cause significant harm.

PREVENT is part of the UK's counter terrorism strategy, it focuses on supporting and protecting vulnerable individuals who may be at risk of being exploited by radicalisers and subsequently drawn into terrorist related activity. PREVENT is not about race, religion or ethnicity, the programme is to prevent the exploitation of susceptible people. Schools and Homestays can play an important part in safeguarding children from the risk of radicalisation. Effective early help relies on all staff being vigilant and aware of the nature of the risk for children and young people, and what support may be available. All Pippa's Guardians staff undergo Prevent training at their induction.

Potential indicators of radicalisation include:

- Use of inappropriate language
- Possession of violent extremist literature
- Changes in behavior, language, clothing or appearance
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

If staff are concerned about a change in the behaviour of an individual or see something that concerns them (this could be a colleague too) they should seek advice appropriately with the Designated Safeguarding Lead, Imogen Trevethan who is also the Prevent Lead for Pippa's Guardians and can be contacted on 01684 252757 or 07593 443685 or imogen@pippasguardians.co.uk. Non-urgent advice is available from the Department of Education on 0207 3407264 or via e-mail at counter-extremism@education.gsi.gov.uk

Female genital mutilation (FGM) includes procedures that intentionally alter or injure the female genital organs for non-medical reasons. It is a surprisingly common form of abuse in the UK.

"FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways". (Multiagency statutory guidance on female genital mutilation, April 2016).

The age at which FGM is carried out varies enormously according to the community. The procedure may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy. FGM is extremely harmful and has short and long term effects on physical and psychological health. FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries, including the UK. Pippa's Guardians takes these concerns seriously and possible signs and indicators that may alert staff to the possibility of FGM are detailed below.

There are a number of factors in addition to a girl's or woman's community or country of origin that could increase the risk that she will be subjected to FGM:

- The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM.
- Any girl born to a woman who has been subjected to FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl who has a sister who has already undergone FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl withdrawn from Personal, Social and Health Education or Personal and Social Education may be at risk as a result of her parents wishing to keep her uninformed about her body and rights.

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, at marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

It is believed that FGM happens to British girls in the UK as well as overseas (often in the family's country of origin). Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies. There can also be clearer signs when FGM is imminent:

- It may be possible that families will practice FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.
- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it.
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent.
- Parents seeking to withdraw their children from learning about FGM.

It is important that professionals look out for signs that FGM has already taken place so that:

- the girl or woman affected can be supported to deal with the consequences of FGM
- enquiries can be made about other female family members who may need to be safeguarded from harm.
- criminal investigations into the perpetrators, including those who carry out the procedure, can be considered to prosecute those breaking the law and to protect others from harm.

There are a number of indications that a girl or woman has already been subjected to FGM:

- A girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating. A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from school or college.
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl or woman may be particularly reluctant to undergo normal medical examinations.
- A girl or woman may confide in a professional.
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs.

The Mandatory Reporting Duty for FGM states that from October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Guardians and Host Families should be aware of this duty and whilst it would be rare for them to see visual evidence, and they should not be examining children or young people, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Under the mandatory reporting requirements teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out (either through disclosure by the victim or visual evidence) on a girl under 18. Those failing to report such cases would face disciplinary sanctions. Members of staff, volunteers and host families are asked to either report any FGM concerns immediately to the Designated Safeguarding Lead or if they feel more comfortable, directly to the local police. Where a referral is made directly to the police, the Designated Safeguarding Lead should also be informed as soon as possible.

DISCLOSURES

9 Initial procedure when abuse is suspected or a complaint is made

- 9.1 A staff or host family member suspecting or hearing a complaint of abuse should report all allegations or complaints of abuse to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead (if DSL not available) or, if the complaint involves the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead, please report the complaint to the Worcestershire Safeguarding Children Partnership LADO's (Local Authority Designated Officer) – Jon Hancock or the duty LADO on 01905 846221
- 9.2 Details of procedures for reporting allegations against staff or host family members or other students are given in sections 12 and 13 below
- 9.3 Staff or host family members should:
- 9.3.1 listen carefully to the student and keep an open mind. Staff or host family members should not take a decision as to whether or not the abuse has taken place;
 - 9.3.2 not ask leading questions, (a question which suggests its own answer)
 - 9.3.3 reassure the student but not give a guarantee of absolute confidentiality. The staff or host family member should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken (please note that the giving of information to others, who have an obligation to receive the information for the purpose of protecting a child, is not a breach of confidentiality);
 - 9.3.4 keep a sufficient written record of any conversation regarding the suspected abuse. There is a disclosure form available in this document for this purpose. It is also available as a standalone document which can be provide to you on request. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Safeguarding Lead as soon as possible.
 - 9.3.5 attempt to safeguard and preserve all available evidence, (for example, notes, mobile phones containing text messages, clothing, computers);
 - 9.3.6 as soon as reasonably practicable after making a verbal report to the Designated Safeguarding Lead, ensure the disclosure form is passed to the DSL or DDSL (in her absence);
 - 9.3.7 if deemed necessary and with full support from the DSL or DDSL immediately provide a safe environment for the student.
- 9.4 Once the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead has been informed of the allegations or complaints of abuse, the staff or host family member suspecting or hearing of the abuse should continue to pass on any further information that comes to light but should not carry out any further investigations into the incident as this may prejudice the investigations of external agencies.
- 9.5 Parents and others who suspect abuse by or hear a complaint of abuse involving a Pippa's Guardian student should also inform the Designated Safeguarding Lead straightaway.

10 Allegations against Pippa's Guardians staff, host families or any other adult

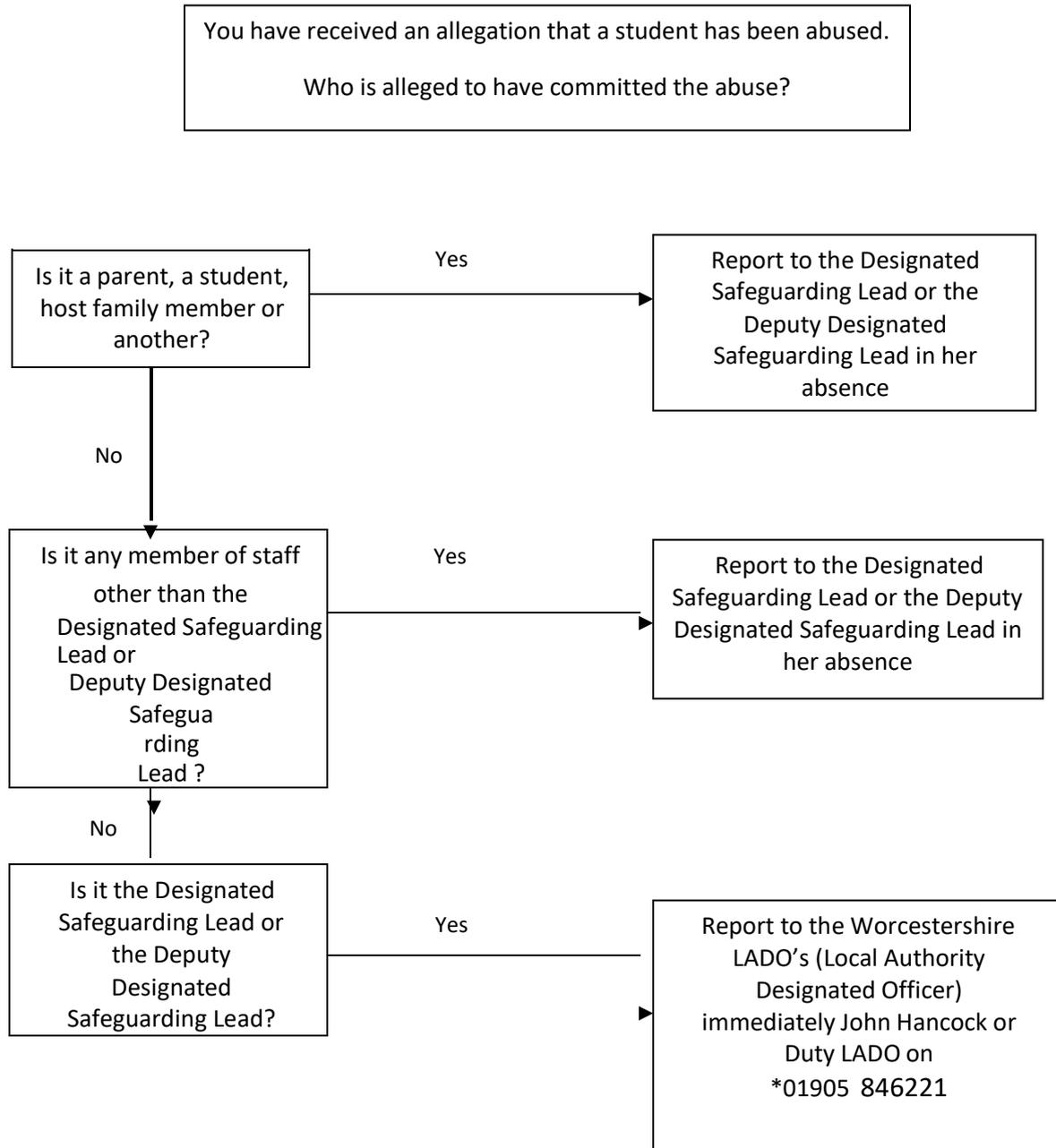
- 10.1** Our procedures for dealing with allegations against Pippa's Guardians staff and host families aim to balance the need to protect students from abuse and the need to protect staff and host families from false and unfounded allegations. Where appropriate, these procedures follow the guidance in the current edition of the Department of Education guidance Keeping Children Safe in Education September 2021.
- 10.2** Suspension of staff will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure the safety and welfare of the student or students concerned; and the need for a full and fair investigation.
- 10.3** If an allegation is made against a member of the student's host family, Pippa's Guardians will provide the student with alternative accommodation while a full investigation takes place.
- 10.4** Detailed guidance is given to staff and host families to ensure that their behaviour and actions do not place students or themselves at risk of harm or allegations of harm to a student. This guidance is contained in Pippa's Guardians Host Family Handbook and in Clause 5 of this policy under the section titled Staff-student and host family-student contact. There is also clear guidance given in the staff Code of Conduct which is handed out to staff at their induction.
- 10.5** All staff are required to report to the Designated Safeguarding Lead any concern or allegations about Pippa's Guardian's practices or the behaviour of colleagues or host family members which they feel are likely to put students at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report, provided that it is done in good faith.
- 10.6** If Pippa's Guardians ceases to use the services of a member of staff because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service (DBS) or other relevant body as determined by future legislation. This report will be made by the DSL. Any such incidents will be followed by a review of the safeguarding procedures within Pippa's Guardians and will be carried out by the DSL.
- 10.7** If a member of staff tenders his or her resignation, or ceases to provide his or her services, any safeguarding allegations will still be followed up by the Guardianship Organisation. Resignation will not prevent a prompt and detailed report being made to the DBS or other relevant body as determined by future legislation, in appropriate circumstances. This report will be made by the DSL.

11 Allegations against students

If a student for whom we have responsibility is accused of abuse against another student for whom we have responsibility, we will take all appropriate action to ensure the safety and welfare of both students, including the student accused of abuse. These procedures will also apply as appropriate if a student for whom we have responsibility is accused of abuse against any other student for whom we do not have responsibility.

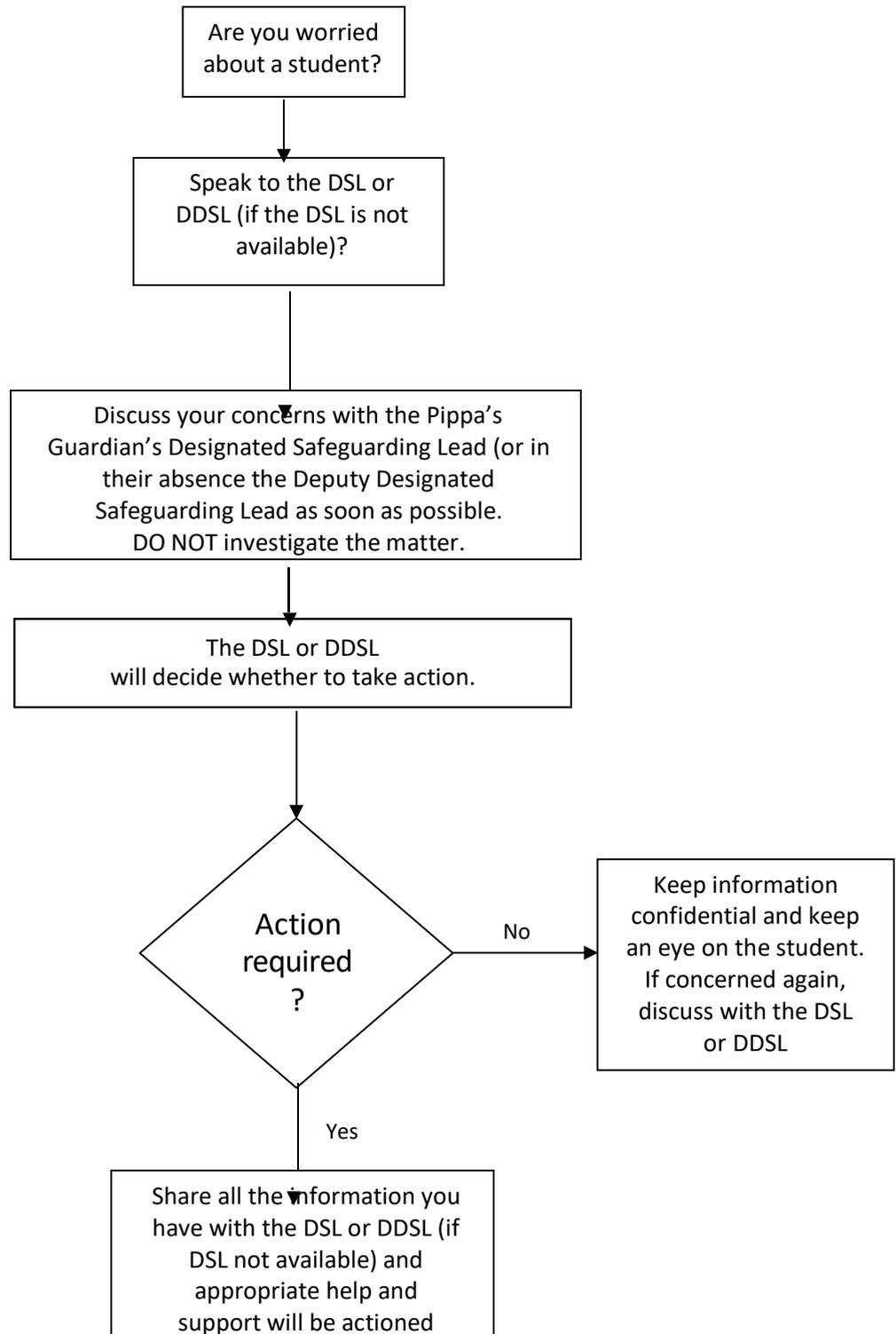
- 11.1** If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, we will ensure that, in consultation with the student's school or college, parents or guardians are informed as soon as possible and that the student is supported during the interview by an appropriate adult.
- 11.2** If the school or college decide that it is necessary to suspend the student during the investigation, we will provide appropriate support, assistance and accommodation wherever possible.

Allegations Flowchart



* The LADO (Local Authority Designated Officer) must be contacted.

Flowchart for a member of staff worried about a student

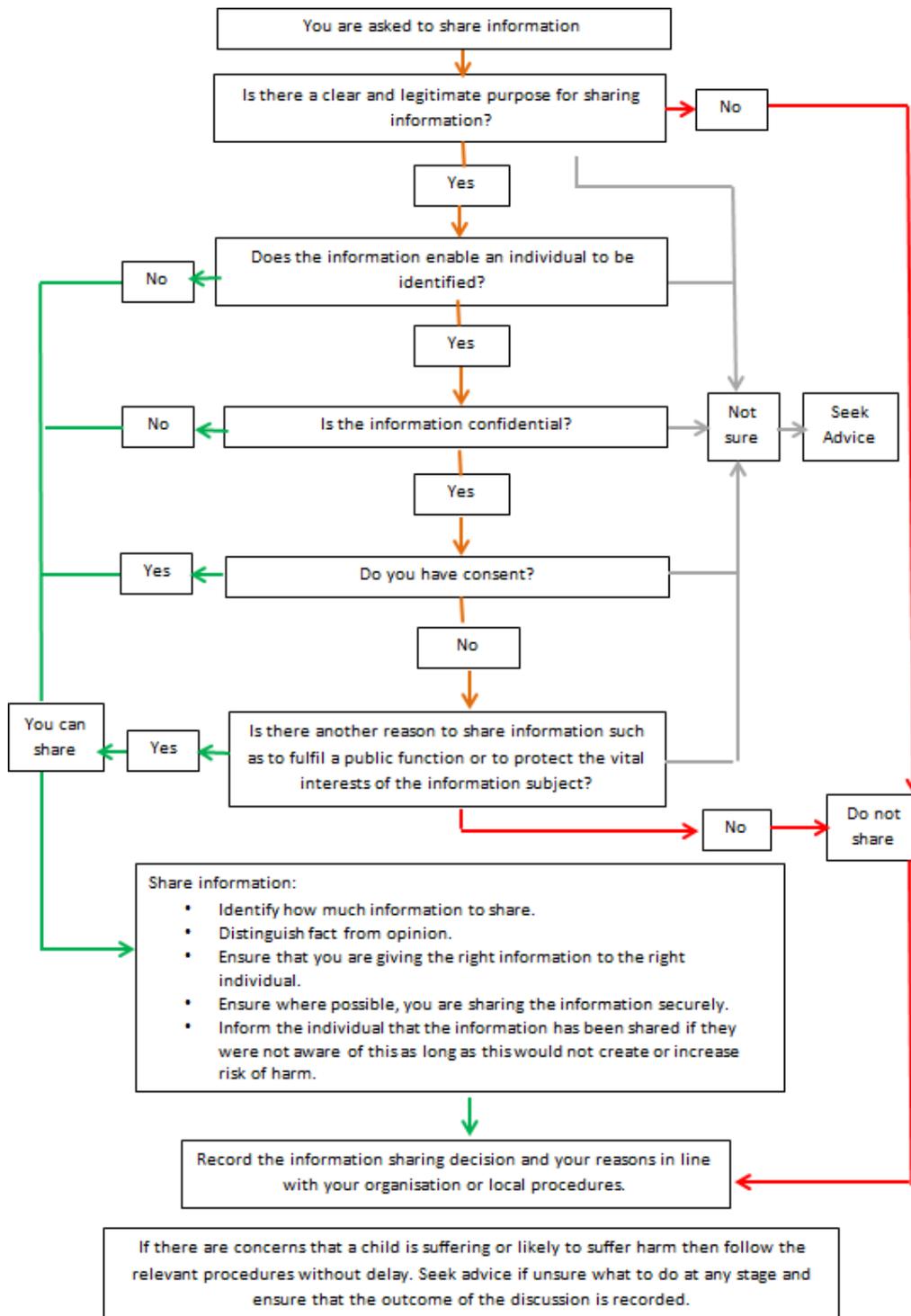


12 Confidentiality and information sharing

- 12.1 Pippa's Guardians will keep all safeguarding records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of the students. We will co-operate with police and childrens services to ensure that all relevant information is shared for the purposes of safeguarding investigations under section 47 of the Children Act 1989 in accordance with the requirements of the current edition of *Working together to safeguard children*.
- 12.2 Except in exceptional circumstances we will always notify the school attended by the student of any concerns relating to a student's safety or welfare.
- 12.1 Following any safeguarding incidents involving students for whom Pippa's Guardians has responsibility, the Designated Safeguarding Lead will review this policy and the procedures and will make a prompt report to Ben Hughes, Managing Director of Pippa's Guardians
- 12.2 In addition, the Designated Safeguarding Lead will monitor the operation of this policy and its procedures and make amendments and improvements where deemed necessary.

The Designated Safeguarding Lead will ensure that any deficiencies or weaknesses in regard to safeguarding arrangements at any time are remedied without delay

13 Flowchart of when and how to share information



Disclosure Reporting Form

1 Introduction

- 1.1 This form comprises part of the Pippa's Guardians Safeguarding Policy and should be read in conjunction with the whole Safeguarding Policy.
- 1.2 This form is designed to be completed by any member of staff or host family member who receives information raising safeguarding concerns either through observation or direct disclosure, from a student or from another source. The purpose of this form is to ensure that an adequate amount of information is recorded at the outset. This form must be completed as soon as possible after the information is received.

Do not allow the completion of the form to delay any verbal notification of the concerns to the Designated Safeguarding Lead but pass the completed form to the Designated Safeguarding Lead, or the Deputy Designated Safeguarding Lead (if the Designated Safeguarding Lead is unavailable) as a matter of urgency.

- 1.3 The Guardianship Organisation's Designated Safeguarding Lead is Imogen Trevethan
Contact - imogen@pippasguardians.co.uk or 01684 252757 or 07593 443685
- 1.4 The Guardianship Organisation's Deputy Designated Safeguarding Lead is Ben Hughes.
Contact - ben@pippasguardians.co.uk or 07714 034749

2 Data Protection

- 2.1 Pippa's Guardians holds personal information about students in order to safeguard and promote their welfare.
- 2.2 The content of this form, when completed, will contain personal information which is subject to the provisions of the General Data Protection Regulation (GDPR) which will apply from 25 May 2018, when it supersedes the UK Data Protection Act 1998. Students, and in certain circumstances their parents or guardians, have the right to request access to personal information about them held by Pippa's Guardians, including the content of this form, although exemptions may apply depending on the circumstances. Legal advice should be sought before any information of this nature is disclosed to students, parents or guardians. This advice will be sought by the DSL or the DDSL.
- 2.3 Pippa's Guardians will keep this record confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. For example, where, in the professional opinion of the Designated Safeguarding Lead, it is deemed necessary we may share this information with children's services or the police for the purpose of safeguarding investigations.

To be completed by a member of staff or host family

Remember:

- ask "open" questions and not leading questions, that is, a question which suggests its own answer
- listen carefully and keep an open mind
- do not take a decision as to whether or not the alleged abuse or neglect has taken place.

Reporting form

Please complete in black pen	
Date	
Time	
Place	
Member of staff present and position	
Name of Host Family making the report	
Full name of student(s)	
Before proceeding have you reassured the student that you are there to help them but you cannot guarantee absolute confidentiality and that you may need to pass the information on to the Designated Safeguarding Lead, Imogen Trevethan who will ensure the correct action is taken?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
Ask the student to explain their concern or allegation and record details of the matter in the space below. Use a separate sheet if necessary and then attach to the form.	

A non-exhaustive list of the details to be included:

- **what was said or done, by whom, to whom and in whose presence when the incident took place and where**
- **whether the student wishes their parents [or legal guardian] to be informed.**

Safeguarding

A copy of the full Pippa's Guardians Safeguarding Policy is available to be viewed on our website: www.pippasguardians.co.uk or if you or your parents would like to see a printed copy of our Safeguarding Policy, please contact us.

These are the details for Pippa's Guardians Head Office;

Pippa's Guardians

5 Grosvenor House, 127 Church Street, Malvern, Worcestershire, WR14 2BA

Tel: +44 (0) 1684 252757

(From the UK dial 01684 252757)

24/7 Emergency line: +44 (0) 7721 372865

(From the UK dial 07721372865)

Email: imogen@pippasguardians.co.uk

Contacting us

Your Area Manager will contact you with his or her phone number and email address – you can contact them by phone, text, email or WhatsApp/WeChat. If you are under the age of 16, you must not use WhatsApp whilst in the EU as they have raised their age limit from 13 to 16 years. For countries outside the EU WhatsApp may continue to be used for those aged 13 years and over. If you are between the ages of 13 and 18 (or the relevant age in your jurisdiction where you are considered a minor), your parent or guardian must agree to these Terms (both for themselves and on your behalf) before you can use WeChat.

Your Area Manager Name:

Your Area Manager Email:

Your Area Manager Telephone:

Glossary of commonly used Safeguarding terms

Abuse - Abuse is any form of maltreatment of a child and covers every form of 'abuse', including sexual, emotional, psychological, material, financial, physical, discriminatory or organisational abuse.

Alert - An alert is a concern that an individual is or may be a victim of exploitation, neglect or abuse.

Assessment - An assessment is a process put in place that identifies the needs of an individual, whether these needs are being met and how their wellbeing and day to day life are being impacted.

Child Protection - Child Protection is a term used to describe the activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm.

Consent - Consent refers to the individual's voluntary and continuing permission for an intervention. The individual must have adequate knowledge of the reason nature, likely consequences and risks of that intervention.

CPS - CPS is short for Crown Prosecution Service. This is a government department that's responsible for prosecuting criminal cases that are investigated by the police in England and Wales.

DBS - DBS is the acronym used for the Disclosure and Barring Service. The DBS is a governmental body.

Designated Safeguarding Lead - The Designated Safeguarding Lead refers to the individual within an organisation who's responsible with management, oversight and coordination where allegations are made or concerns raised about a person.

Domestic abuse - Domestic abuse refers to any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over. This also includes those who are or have been intimate partners or family members.

Enhanced DBS Check - An enhanced DBS check is a form of Disclosure and Barring Service check.

GDPR - GDPR stands for the General Data Protection Regulation. This is an EU regulation and law on data protection and privacy for all individuals within the EU and EEA.

Harm - Harm refers to any ill-treatment including sexual abuse and ill-treatment that isn't physical, the avoidable deterioration and or impairment in physical or mental health. of physical, intellectual, emotional, social or behavioural development.

Hate crime - A hate crime is any crime that is thought to be a crime that's been committed against someone for racist, homophobic, transphobic reasons. This may also be due to a person's religion, belief, gender identity or disability.

Human trafficking - Human trafficking refers to the recruitment, transportation, transfer, and harbouring of someone with the intention of threatening them or using force and or other forms of coercion, and abusing the power or of a position of vulnerability, and achieving coerced consent of a person having control over someone else by giving and receiving of payments or benefits, for the purpose of exploitation.

LSP - LSP stands for the Local Safeguarding Partnerships, which is compiled of a team of key professionals from three sectors: the local authority; the clinical commissioning group for any area that falls under the local authority and the chief officer of police for any area that falls under the local authority

MASH - MASH stands for Multi-Agency Safeguarding Hub. This service is made up of Police, Adult Services, NHS and other organisations. MASH helps agencies to act quickly in a coordinated and consistent way. This means that the person at risk is kept safe.

PREVENT -PREVENT is a Government strategy that was launched in 2007. This strategy aims to stop people from becoming terrorists or supporting terrorism and is part of the government's counter-terrorism strategy

Safeguarding -Safeguarding is the term used to describe any activity that protects a person's right to live in safety, free from abuse and neglect.

Self-neglect -Self-neglect is the intentional or unintentional the inability to maintain a socially and culturally accepted standard of self-care, that results in serious consequences to the health and well-being of the individual.

Significant Harm - Significant harm refers to any ill-treatment (including sexual abuse and forms of ill-treatment which are not physical), that has resulted in the impairment of physical, intellectual, emotional, social or behavioural development.

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Policy Version Number V6

Policy Review Date: 27th August 2022

Responsible for Policy Review: Ben Hughes/Imogen Trevethan