



My Life Support & My Life Opportunities Safeguarding Children & Vulnerable Adults Policy

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Key Contacts

Key Safeguarding Personnel

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If you believe a child or adult is at immediate risk of significant harm, injury or death, contact the Police on 999.

1. Statement of Policy

1.1 Introduction

My Life Legacy is committed to safeguarding and promoting the welfare of all our members and service users, both children and adults. Our members have the right to be safe from harm and should be able to live free from fear of abuse, neglect and exploitation.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

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 and
- Taking action to enable all children to have the best outcomes.

The legal definition of an 'adult at risk' is anyone aged 18 or over who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) and
- Is experiencing, or is at risk of abuse or neglect; and
- As a result of those care and support needs is unable to protect themselves from either the risk, or the experience of abuse or neglect.

This policy has been developed in accordance with the principles established by:

- The Care Act 2014
- The Children and Social Work Act 2017
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2021
- The Mental Health Act 1983 (amended 2007)
- The Human Rights Act 1998

This policy references other key documents such as:

- GDPR and Data Protection Act 2018
- Information Sharing: Advice for Practitioners 2018
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges 2018
- Coronavirus (COVID-19) Safeguarding in Schools, Colleges and Other Providers 2020

- Counter-Terrorism and Security Act 2015
- Prevent Duty Guidance 2015
- Serious Crime Act 2015
- Wigan Safeguarding Children Board Policy
- Wigan Safeguarding Adults Board Policy

1.2 Aims & Objectives

The aim of this policy is to ensure:

- All of our members and learners are safe and protected from harm
- Safeguarding procedures are in place to help members and learners to feel safe and learn to stay safe
- Adults in the education setting community are aware of the expected behaviours and the legal responsibilities in relation to safeguarding and child protection
- All agencies are providing appropriate support to children and adults through the adoption of the early health framework

This will be achieved by:

- Supporting the child/adult's development in ways that promote security, confidence and independence
- Providing a high quality and safe environment in which children and adults feel safe, secure, valued and respected
- Raising awareness of all staff of the need to safeguard children and adults of their responsibilities in identifying and reporting possible cases of abuse and preventing and intervening earlier to address the support and social needs of the individual
- Providing a systematic means of monitoring children and adults known or thoughts to be at risk of harm and ensure My Life contribute to the assessments of need
- Emphasising the need for good levels of communication between all members and staff
- Developing a structured procedure which will be followed by all staff in cases of suspected abuse
- Ensure all staff have access to specific training and awareness including: staff behaviour policy, DSL training, KCSiE Part 1, online safety, Prevent and whistleblowing
- Developing and promoting effective multi-agency cooperation and communication with external agencies including, health, social care and the Police
- Ensuring that all staff working within My Life Learning who have access to children and young people have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check and a central record is kept for audit.
- My Life Learning curriculum – teaching about safeguarding and ensuring learners access a broad and balanced curriculum that promotes their spiritual, moral,

cultural, mental and physical development and prepares them for the opportunities, responsibilities and experiences of life.

1.3 Related Policies

- Equality and Diversity Policy
- Anti-Bullying Policy
- Whistle Blowing Policy
- Code of Conduct Policy
- Data Security & Data Retention Policy
- Spot Checks Policy
- Challenging Behaviour Policy
- Anti-Radicalisation and Extremism Policy

1.4 Scope

This policy applies to everyone who is employed by My Life Legacy, whether in paid employment or not. It also applies to visitors and contractors.

2. Definitions

The following are recognised as abuse as per Care Act 2014, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2021.

2.1 Definitions of Child Abuse

Physical Abuse

A form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. It may also include a parent or carer fabricating an illness or deliberately inducing an illness.

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may involve overprotection and limitation of learning, or preventing the child participating in normal social interaction.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of a child's health or development. Neglect may involve a parent or carer failing to provide adequate food, clothing and shelter. It may involve failing to protect a child from physical and emotional harm or preventing access to appropriate medical care or treatment.

Sexual Abuse

Forcing or enticing a child to take part in sexual activities. This may involve physical contact which includes assault by penetration (rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Non-contact activities such as involving children in looking at or in the production of sexual images. Encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

2.2 Definitions of Adult Abuse

Physical Abuse

Includes assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

Psychological Abuse

Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Financial or Material Abuse

Including theft, fraud, exploitation, pressure in connection with property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Sexual Abuse

Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, sexual acts to which the adult has not consented or was pressured into consenting.

Domestic Abuse

Including psychological, physical, sexual, financial abuse and so called 'Honour' Based Violence.

Neglect and Acts of Omission

Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life such as medication, adequate nutrition and heating.

Modern Slavery

Encompasses slavery, human trafficking, forced labour and domestic servitude, coercion and deceit to force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory Abuse

Including forms of harassment, slurs or similar treatment because of race, gender and gender identify, age, disability, sexual orientation or religion.

Self-Neglect

Neglecting to care for one's personal hygiene, health or surroundings and includes behaviours such as hoarding.

Organisational Abuse

Incidents of poor practice or neglect that are based on the needs of staff/managers that causes significant harm to those subjected to it.

2.3 Other Definitions

Child Sexual Exploitation and Criminal Exploitation/County Lines

A form of abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, often in exchange for something the victim needs or wants. Child Sexual Exploitation and Criminal Exploitation can affect children and adults, both male and female, and can include individuals who are victims of trafficking for the purpose of exploitation as well as county lines.

Staff will ensure that the DSL and other key staff are trained in spotting the possible signs of exploitation.

Peer on Peer Abuse

Peer on Peer abuse is likely to include, but not limited to bullying (including cyberbullying), physical abuse (which includes threats or encouraging physical abuse), sexual violence, sexual harassment, upskirting, youth produced sexual imagery, initiation/hazing type violence and rituals.

All Peer on Peer Abuse is taken seriously and not tolerated or passed off as "banter". Victims, perpetrators and any other child or adult affected by Peer on Peer Abuse will be supported through My Life's pastoral system and the support will be regularly reviewed.

We minimise the risk of Peer on Peer Abuse for learners by providing a relevant curriculum that helps learners develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe. My Life Legacy have established systems in place for members to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issue they raise will be taken seriously.

Female Genital Mutilation (FGM)

A procedure where the female genitals are deliberately cut, injured or changed with no medical reason or justification. Other terms include *sunna*, *gudniin*, *halalays*, *tahur*, *megrez* and *khitan*.

There are four types of FGM procedure:

- Clitoridectomy – partial/total removal of the clitoris
- Excision – partial/total removal of clitoris and labia minora
- Infibulation – entrance to the vagina is narrowed by repositioning the inner/outer labia
- All other procedures – pricking, piercing, incising, cauterising and scraping the genital area

My Life Legacy recognises and adheres to its mandatory duty to report any suspected or known cases of FGM about a female under 18 years old to the Police.

The DSL's will maintain up-to-date knowledge of the Greater Manchester Safeguarding Partnership Protocol on FGM.

Forced Marriage

A human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. The Forced Marriage Unit offers support to victims and should be contacted for advice and support.

Serious Violence

Specific crimes such as homicide, knife crime and gun crime where serious violence or its threat is inherent. All staff should be aware of the indicators which may suggest a child, adult or learner is at risk from, or involved with serious violent crime.

Mental Health

Mental health problems can be an indicator that a person has suffered or is at risk of suffering abuse, neglect or exploitation. Adverse experiences such as abuse or trauma can have a long-lasting impact on a person's childhood, adolescence and adulthood.

Young Carers

A young carer is someone under 18 years-old who is responsible for looking after their family or friend who is ill or disabled. My Life recognises that being a young carer can impact learners and it's important these learners are identified early so that preventative strategies can be implemented to provide appropriate support.

The local Young Carers Strategy is coordinated by Wigan Safeguarding Children Board.

Radicalisation

Radicalisation is the process in which vulnerable individuals are coerced into supporting terrorism and various forms of extremist ideology. There is no specific way of identifying whether someone is vulnerable to extremist ideology, therefore all staff must remain vigilant when assessing changes in member's behaviour.

All staff are required to complete mandatory Prevent training and the DSL will remain as the senior point of contact.

3. Roles & Responsibilities

At My Life Legacy, safeguarding is everybody's responsibility and we ask all staff to maintain the attitude 'it could happen here'. All staff undergo safeguarding training at induction, relevant training for DSL's and will engage in regular development sessions.

3.1 Designated Safeguarding Leads

My Life Legacy have three appointed DSL's to act as a single point of contact in all safeguarding matters for each business area.

DSL for My Life Support: **Scott Cummins**

DSL for Life Opportunities: **Alison Greenhalgh**

Currently there are three Deputy DSL's: **Tracey Tolley** and **Nigel Lyons**

The DSL's and DDSL's are most likely to have the complete picture and be the most appropriate person to advise on responses to safeguarding concerns. The DSL should take lead responsibility for safeguarding and ensure that My Life Legacy's Safeguarding policy is fully implemented. All DSL's and DDSL's will be trained to a minimum of Safeguarding Level 4 and this will be updated every two years as a minimum. The DSL's will also attend multi-agency courses relevant to the needs of the service.

In My Life Learning, during term time, the DSL/DDSL is always available during school hours for staff to discuss any safeguarding concerns. The voice of the individual is central to our safeguarding practice and pupils are encouraged to express and have their views given due weight in all matters affecting them.

The DSL has responsibility for the day-to-day operational implementation of safeguarding practice. This includes:

- Providing advice, support and expertise to all staff on safeguarding matters

- Managing, when required, the referral of cases of suspected abuse or allegations to the relevant agencies
- Liaising with other DSL's in health and education settings
- Maintaining detailed, accurate and secure written records of concerns, allegations and referrals
- Referring cases to the Channel programme where there is a radicalisation concern
- Attending case conferences and review meetings as appropriate
- Communication of this policy and safeguarding arrangements to all relevant parties, including families and carers
- Ensuring that all staff receive safeguarding training appropriate to their roles

The Chief Executive Officer will take the lead responsibility for any safeguarding concerns raised in respect of the DSL.

Chief Executive Officer: **Caroline Tomlinson**

The Board of Trustees has a duty to ensure that My Life Legacy meets its statutory safeguarding responsibilities and that all the members supported by My Life Legacy are safe. The DSL provides quarterly reports to the Board to support their execution of this function. In addition to this there is a designated Lead Trustee for safeguarding who carries out regular safeguarding review with the DSL.

Lead Trustee for Safeguarding: **Amanda McDonough**

3.2 Staff Responsibilities

All staff, volunteers and trustees working on behalf of My Life Legacy have a duty to promote the welfare and safety of all our child, adult members and learners. Staff may receive disclosures of abuse, observe or have suspicions of abuse and any such concerns (whether witnessed or otherwise) should be reported immediately to the DSL, DDSL or the most senior member of staff on duty in their absence.

All staff are:

- To familiarise themselves with this policy
- To be alert to signs and indicators of possible abuse
- To be able to record and report concerns
- To be able to deal with a disclosure of abuse from a member or learner
- To be involved in the implementation of individual education programmes, integrated support plans, child in need plans and inter-agency child protection plans as required

Staff should not assume a colleague or other professional will act and share information that might be critical in keeping a person safe. Early information sharing is vital for risk identification and management.

All staff are required to have completed their safeguarding induction training before working with any members. All staff will have this training and it will be updated every three years as a minimum to ensure staff understand their role in safeguarding. All staff will receive regular updates on safeguarding via email, e-bulletins and staff meetings. All staff are required to complete additional Safeguarding Level 2 training via E-Learning.

All My Life Learning staff are required to read and understand Part 1 of Keeping Children Safe in Education. They should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child, young person or adult.

All staff are required to demonstrate good knowledge of the categories of abuse and associated risk indicators.

All staff are required to undertake Prevent training.

3.3 Responding to Concerns, Allegations and Disclosures of Abuse

My Life Legacy asks all staff to familiarise themselves with The Four R's:

- Recognise
- Respond
- Record
- Refer

The first step is to **recognise** the signs of abuse by staff familiarising themselves with the areas covered in *Section 2* of this policy. If potential abuse, harm or neglect is recognised, staff must **respond** and report the concerns to the DSL immediately or the most senior member of staff in their absence.

All staff must **record** their findings in detail via the relevant recording procedures (CPOMS). It is all staff's responsibility to ensure the DSL receives the record as soon as possible.

If there is an immediate risk of harm to the child or adult, we must **refer** the incident to the Local Authority or the police if a criminal act is suspected.

Staff adhere to the following 'Do's' and 'Don'ts' when responding to a disclosure of abuse.

Do:

- Create a safe environment by offering the individual a private and safe place if possible
- Stay calm and reassure the person and reiterate that he/she is not to blame
- Listen carefully and tell the person what you are going to do next
- Use the tell, explain, describe strategy
- Record in detail without delay

Don't:

- Take photographs of any injuries
- Postpone or delay the opportunity for the person to talk
- Try to investigate the allegation yourself
- Promise confidentiality
- Approach or inform the alleged abuser

4. Information Sharing

My Life Legacy recognises that all information related to safeguarding concerns and child protection must be confidential and stored securely.

Information sharing is vital for risk formulation and management, and is integral for safeguarding and promoting the welfare of children and adults at risk.

Any decisions to share information should be in line with the Data Protection Act 2018 and GDPR, however these are not barriers to sharing information.

All staff have a professional responsibility to share information as a means so safeguard members. Any queries regarding the sharing of confidential information should be discussed with the Caldicott Guardian.

My Life Legacy is committed to working in partnership with families and carers. However, the DSL will not share information where there are concerns that if so doing would:

- Place the individual at increased risk of significant harm
- Prejudice the prevention, detection or prosecution of serious crime
- Lead to unjustified delay in making enquiries about allegations of significant harm

4.1 Information Sharing for Safeguarding Practitioners

The UK Government have issued 'Golden Rules' for information sharing in safeguarding:

- GDPR/Data Protection Act 2018 and Human Rights Act 1998 are not barriers but provide a framework to ensure that personal information is shared appropriately
- Be open and honest with the individual
- Seek advice from other practitioners if you are in any doubt about sharing the information
- Share with informed consent where appropriate
- Consider safety and wellbeing
- Necessary, proportionate, relevant, adequate, accurate, timely and secure
- Keep a record of your decision and the reasons for it

All sharing of information will be necessary to the purpose for which it is shared. Information will only be shared with individuals who need to have it and shared via secure channels.

4.2 CPOMS

CPOMS is My Life Legacy's chosen software solution for monitoring safeguarding across the organisation. CPOMS is a secure, web-based solution that allows staff to feel confident in the knowledge that the information they report is shared instantly with the relevant people, immediately and securely. All our staff can log on to CPOMS and create information on any member they have concerns about. They cannot, however, access member information without the required permissions (managed by the DSL).

The DSL's are able to swiftly assess the information and take necessary action as required.

5. Safe Recruitment & Safe Setting

5.1 Safe Recruitment

My Life Legacy will ensure that:

- There is a safeguarding children and vulnerable adults policy in place as well as a code of conduct which is reviewed on an annual basis
- There is at least one person on every recruitment panel that has completed Safer Recruitment Training which is renewed every three years as a minimum
- All staff are subject to enhanced DBS checks prior to employment
- Procedures are in place for managing allegations of abuse against staff and volunteers
- There is a DSL in post along with DDSL's who have undertaken the relevant training
- All staff have completed the appropriate safeguarding training and updated by the DSL as appropriate
- This policy is available on the My Life website or by other means

- The names of the DSL/DDSL's will be made visible for all staff and members to see
- All staff are trained in e-safety and reporting concerns
- All new staff are provided with this policy, with the DSL's names clearly displayed, as part of their induction
- All parents/carers are made aware of the responsibilities of staff members with regards to safeguarding procedures
- All visitors are required to sign in and wear appropriate visitor ID badges. Visitors of a professional capacity are to provide evidence of their role and employment details upon arrival

5.2 Allegations Against Staff

There are procedures in place for the management of allegations of abuse against staff and volunteers. If an allegation is made or information is received that suggests that a person may be unsuitable to work with vulnerable children or adults, the CEO and DSL must be informed immediately. The DSL will discuss the content of the allegation with the Designated Officer (formally LADO).

All staff are expected to have awareness and knowledge of guidance on behaviour issues, along with My Life Legacy's Behaviour Management Policy and this should be part of induction for all new staff or volunteers.

Under no circumstances will My Life Legacy send a child, young person, adult or learner home pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the DO.

Suspension of a member of staff will be given careful consideration and the DSL will seek advice from HR in order to make a decision and informing the DO at the earliest opportunity.

In the event of an allegation against the DSL, the CEO will take lead responsibility. Within My Life Learning, in the event of an allegation against the Headteacher, the decision to suspend will be made by the Chair of Governors/Trustees.

A referral is made to the DBS and PiPOT if a person working with vulnerable children or adults has been dismissed or removed from post due to safeguarding concerns. Referrals should be made as soon as possible, and ordinarily on conclusion of an investigation. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained within the DBS referral guidance.

Guidance about conduct and safe practice, including safe use of mobile phones, will be provided at induction alongside further safeguarding information.

6. Children with Special Education Needs & Disabilities (SEND)

My Life Learning will use the same considerations for children, young people and adults with SEND.

My Life Legacy recognises that careful consideration needs to be taken in relation to additional barriers that can exist when recognising abuse and neglect in this group. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the individuals SEN or disability without further exploration
- A high risk of vulnerability due to factors such as; learning disability, lack of awareness, social isolation, which may contribute to risks such as online vulnerability
- Being more prone to peer group isolation
- The potential for individuals with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these

Individuals with SEN and disabilities can face a number of challenges to disclosure, which must be recognised and taken into account, including; prejudice, negative responses and low expectations

7. Physical Intervention and the use of reasonable force

Staff must only ever use physical intervention as a last resort, when a child, adult or learner is endangering themselves or others.

The term 'reasonable force' covers a broad range of actions that involve a degree of physical contact to control or restrain children, adults or learners. Any use of force must be reasonable, proportionate and necessary to the risk posed at that time.

All staff who are likely to need to use physical intervention or reasonable force will be adequately trained in Team Teach, an accredited training regime for positive behavioural management.

All events involving physical intervention should be recorded appropriately. Any physical intervention of a nature which causes injury or distress may be considered under child protection or disciplinary procedures.

My Life Legacy recognises that touch may be appropriate in the context of working with children and adults, and all staff are aware of the practice guidance related to clear professional boundaries.

8. Monitoring and Evaluation

My Life Legacy's safeguarding policy and procedures will be monitored and updated by:

- Governing Body visits (Ofsted, CQC)
- SMT drop-ins and discussions with children, adults, learners and staff
- Member surveys and questionnaires
- Scrutiny of exclusion and attendance data
- Records of bullying, racist, behaviour incidents and regular monitoring
- Review of parental concerns and parent/carer questionnaires
- Review of the use of intervention strategies

8.1 Risk Evaluation Management and Monitoring (REMM)

REMM is the process by which My Life Legacy works together across the different business areas on the management of complex risks presented by individual members who access our services.

The whole purpose of identifying and managing complex cases aims to allow effective information sharing between the staff who regularly support those members. This allows for greater understanding of individual need and a more consistent response where necessary, leading to a greater organisational ability to recognise when a member is either in or approaching crisis. The process is managed and monitored holistically by My Life Legacy, rather than responsibility for those tasks remaining within a particular business area.

This process ensures that:

- We have both the capacity and the capability to provide the level of support needed by a member in advance of any agreement to provide services,
- Allows us to monitor and respond to variability once services are being provided and,
- If necessary, enables us to refer back, with a detailed evidence base, to the commissioner for a review of support requirements should difficulties be encountered.

It also enables us to develop individual 'exit' strategies from My Life Legacy when the member moves on, incorporating an 'after care' follow up element to aid transition.

Our aim is that this process increases confidence in My Life Legacy and enhances its reputation among members' parents and carers.

The REMM discussion group is made up of Heads of Services, i.e. Life Opportunities at both Standish and Leigh, My Life Support, My Life Learning, Referrals and Membership Pastoral Care/Support, plus the members of staff who have been identified as key workers and owners of the individual member's Risk Assessment. A fundamental part of the discussion groups is to update and approve those risk assessments.

The length of time spent as part of REMM is dependent on the individual member's specific circumstances, but the ultimate aim is for My Life Legacy to have been able to mitigate risks of concern to the point where the member is discharged from REMM and returns to regular support levels consistent with their individual support plans.

9. Training

All staff and volunteers have read, signed and understood My Life Legacy's behaviour policy for safer working practice.

My Life Legacy ensures that training meets the minimum standards set out by Wigan Safeguarding Partnership.

My Life Legacy has a Training & Development Team in place which the DSL's are a part of to deliver bespoke training sessions on specific areas of safeguarding and child protection

9.1 Induction

The welfare of our members is of paramount importance. All staff, including volunteers, are informed of the safeguarding procedures including online safety, at induction.

All staff are required to undergo face-to-face safeguarding training with the DSL.

9.2 Safeguarding Training

This training is for all staff and is updated every three years as a minimum to ensure consistency with staff's understanding and knowledge of safeguarding.

All staff receive statutory training and safeguarding updates via alternate means (email, staff meetings). All staff are required to completed E-Learning training as well as Prevent.

9.3 Advanced Training

The DSL/DDSL undergo additional training which is to be updated every two years as a minimum. The DSL/DDSL's also attend multi-agency courses relevant to the organisations needs.

9.4 Safer Recruitment

At least one person on any appointment panel has undertaken Safer Recruitment Training. This training is updated every five years as a minimum.

9.5 Preventing Radicalisation

All staff undertake mandatory Prevent training as well as additional workshops delivered by a DSL.

9.6 Staff Support

My Life Legacy supports staff by providing an opportunity to talk through challenging aspects of their role with a senior leader and seek further support as appropriate.

9.7 Governors

Governors undertake the My Life Legacy induction programme. They may also choose to complete face-to-face training provided by Wigan Council.

10. Whistleblowing

All staff have a duty to ensure standards of quality care by raising concerns regarding wrongdoing or malpractice. Staff can confidentially raise genuine concerns of malpractice and/or misconduct through appropriate means at the earliest point without fear of reprisal.

This procedure is intended to provide a safeguard to enable staff to raise concerns about one or more of the following that has occurred, is occurring, or is likely to occur. These qualifying disclosures mean that you can raise a concern about risk, malpractice or wrongdoing that is potentially harming the services My Life Legacy delivers. Examples of these are, but not limited to:

- Unsafe care
- Unsafe working conditions
- Inadequate induction or training for staff
- Lack of response to a Health & Safety incident
- Suspicions of fraud

- Damaging the environment such as disposing of hazardous materials or medication inappropriately
- A bullying culture
- Incidents of unsafe staffing
- Falsification of clinical records
- Failure to investigate claims of abuse
- Breaching the Data Protection Act 2018

My Life Legacy maintains a zero tolerance policy for the ill treatment of others, including bullying or harassment.

My Life Legacy ensures that individuals who raise a concern can do so confidentially in line with the Public Interest Disclosure Act 1998 (PIDA).

My Life Legacy will ensure that any individual who raises a genuine concern under the Whistleblowing Policy will not be at risk of termination of their employment or suffer any form of reprisal which includes, but not limited to, loss or reduction of hours to regular working patterns.

Appendix One

Recognising Signs of Child Abuse

The following non-specific signs may indicate some form of abuse:

- Significant changes in behaviour
- Increased aggression or depressive state
- Care-seeking behaviour
- Suspicious bruising with unsatisfactory explanations
- Lack of self-esteem and confidence
- Self-injury
- Inappropriate sexualised behaviour

The factors described in this section are frequently found in cases of child abuse. Although their presence is not definitive proof that abuse has occurred, they:

- Must be regarded as indicators of the possibility of significant harm
- Justify the need for careful risk assessment and discussion with appropriate professionals
- May require consultation with Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship, the child may appear frightened or act in a way that is inappropriate to their age and development.

Possible indicators of an abusive relationship with parents/carers include:

- Persistently avoiding medical treatment
- Having unrealistic expectations of the child
- Frequently complain about/to the child
- Fail to provide attention or praise to the child
- Misusing substances
- Refusing access to the home
- Involvement in domestic abuse

Staff need to be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Recognising Physical Abuse

The following indicators are often regarded as a physical abuse concern:

- Unsatisfactory explanation of an injury
- Several different explanations for an injury
- Unexplained delay in seeking treatment
- Parents/carers uninterested or undisturbed by an injury
- Repeated presentation of minor injuries
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as a non-accidental unless there is sufficient evidence or adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour, possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints
- Bruising or tears around or behind the earlobe, indicating pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

Medical opinion should be sought where there is any doubt over the origin of a bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds. They will always require experienced medical opinion. Any burn with a clear outline may be suspicious such as:

- Circular burns from cigarettes
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid

- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scars to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between child and parent/carer e.g. anxious, indiscriminate or no attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviours towards others
- Scapegoated within the family
- Frozen watchfulness
- Low self-esteem
- Lack of confidence
- Withdrawn
- Difficulty relating to others

Recognising Sexual Abuse

Both males and females of all ages may be sexually abuse, many of which are scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and a full account should be taken of the cultural sensitivities of any individual child/family.

Recognition of sexual abuse can be difficult, unless the child discloses and is believes. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with sexual abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm, self-mutilation and suicidal ideation
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events.

Some physical indicators associated with sexual abuse are:

- Pain or itching of the genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs
- Sexually transmitted disease
- Presence of semen on vagina, anus, external genitalia or clothing

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutually and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry

and physical damage. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity, included any behaviour involving coercion, threats, aggression, together with secrecy, or where one participant relies on an unequal power base.

In order to fully determine the nature of the incident, the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power, control and authority, passive and assertive tendencies
- **Consent** – agreement including all of the following
 - Understanding that is proposed based on age, maturity, development level, functioning and experience
 - Knowledge of society’s standards for what is being proposed
 - Awareness of potential consequences and alternatives
 - Assumption that agreements or disagreements will be respected equally
 - Voluntary decision
 - Mental competence
- **Coercion** – the younger perpetrator who abuses may use techniques such as bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship etc. Some may use physical force, brutality or the threat of these regardless of victim resistance

When evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs such as adequate food, clothes, warmth, hygiene, medical and dental care
- A child seen to be listless, apathetic and irresponsible with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

Recognising Child Sexual Exploitation (CSE)

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation:

- Underage sexual activity
- Inappropriate sexualised behaviour
- Repeated pregnancy, abortions and miscarriages
- Repeated sexually transmitted infections
- Unexplained gifts from unknown sources
- New, unaffordable material items
- Getting in/out of different vehicles with unknown adults
- Contact with unknown perpetrators
- Involved in abusive relationships
- Intimidated and fearful of certain individuals
- Truancy, exclusion, disengagement with services
- Changes in behaviour (increased aggression, emotional distress, volatile behaviour)
- Self-harm and suicidal ideation
- Drug or alcohol misuse
- Involvement in gangs
- Injuries from physical assault, restraint or sexual assault

Recognising Criminal Exploitation & County Lines

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children, young people and vulnerable adults who may be victims of criminal exploitation/county lines:

- Staying out late or returning home late
- Observed to be found in areas away from home
- Increased drug use or being found with large amounts of drugs on their person
- Secretive around who they are talking to and where they are going
- Unexplained absences
- Unexplained money, gifts or material goods
- Increasingly disruptive behaviour
- Physical injuries and dishevelled appearance

Appendix Two

Online Abuse

Online abuse is any type of abuse that happens on the internet. It can lead to anxiety, self-harm, eating disorders and suicidal thoughts. Online abuse can happen on:

- Social media
- Text messages and messaging apps
- Emails
- Online chats
- Online gaming
- Live-streaming sites

Individuals may experience different forms of online abuse including:

- Cyberbullying
- Emotional abuse
- Grooming
- Sexting
- Sexual abuse
- Sexual exploitation

An individual experiencing online abuse might:

- Spend a lot more or a lot less time than usual online, texting, gaming or using social media
- Seeming distant, upset or angry after using the internet
- Be secretive about who they're talking to and what they're doing online or on their devices
- Have lots of new phone numbers, texts or email addresses on their devices

Female Genital Mutilation (FGM)

FGM is a human rights abuse and there are many circumstances and occurrences that may point to FGM happening such as:

- A child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- A child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities such as Yemeni, Afghani, Kurdistan and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Many cultures believe that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman/rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean/hygienic
- Is cosmetically desirable
- Mistakenly believes to make childbirth easier

Signs that may indicate a child has undergone FGM include:

- Prolonged absences from school and other activities
- Behaviour change on return from holiday (withdrawn, appearing subdued)
- Bladder or menstrual problems
- Difficulty sitting still and appearing uncomfortable
- Complaining about pain in the genital area
- Mentioning something someone did to them but are not permitted to talk about it
- Secretive behaviour, including social isolation
- Reluctance to take part in physical activity
- Repeated urinal tract infection

Similarly to Forced Marriage, My Life recognises the 'One Chance' rule and take action against FGM without delay.

Upskirting

Upskirting is now a criminal offence. It typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Serious Violence

All staff should be aware of indicators, which may signal that individuals are at risk from, or are involved with serious violent crime. These may include:

- Increased absences
- A change in friendships
- Relationships with older individuals or groups
- A significant decline in educational performance
- Signs of self-harm
- Significant changes in wellbeing
- Signs of assault or unexplained injuries

Unexplained gifts or new possessions could also indicate that individuals have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Glossary

A Child	A person who has not yet reached their 18 th birthday.
Abuse	A form of maltreatment. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. Individuals may be abused in a family or community setting by those who know them or by others. They may be abused by an adults or children.
An Adult	A person who is 18 years old or over
Bullying & Cyberbullying	Behaviour that is repeated and intended to hurt someone either physically or emotionally. Bullying is often aimed at certain groups, for example, because of race, religion, gender or sexual orientation.
Child Protection	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer significant harm.
Children with Special Education Needs and/or disabilities	SEN – a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her.

	Disability – a physical or mental impairment which has long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.
Contextual Safeguarding	An approach to understanding, and responding to, individual’s experiences of significant harm beyond their families. It recognises that the different relationships that people form in their neighbourhoods, schools and online can feature violence and abuse.
Early Help	Intervening early and as soon as possible to tackle problems emerging for children, young people and families with a population most at risk of developing problems. Effective intervention may occur at any point in a child or young person’s life
Gangs & Youth Violence	Defining a gang is difficult. They tend to fall into three categories: peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public areas to socialise, and although some peer group gatherings can lead to increased anti-social behaviour and low level youth offending, these activities should not be confused with that of a Street Gang.
Hate	Hostility or prejudice based on one of the following things: <ul style="list-style-type: none"> • Disability • Race • Religion • Transgender identity • Sexual orientation
Honour Based Violence (HBV)	So-called ‘honour based violence’ encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.
Private Fostering	A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18 if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Close family relative is defined as a ‘grandparent, brother, sister, uncle or aunt’ and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins).
Radicalisation & Extremism	Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
Relationship Abuse	Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might

	include some or all of the following; sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.
Safeguarding Adults	Protecting the health, wellbeing and human rights of adults at risk, enabling them to live safely, free from abuse and neglect
Safeguarding Children	<ul style="list-style-type: none"> • 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
Sexting	<p>Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages.</p> <p>They can be sent via any device that allows you to share media and messages.</p>
Trafficking	<p>Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation.</p> <p>Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs</p>

Further Resources

Care Act 2014	Care Act 2014 (legislation.gov.uk)
Children and Social Work Act 2017	Children and Social Work Act 2017 (legislation.gov.uk)
Safeguarding Vulnerable Groups Act 2006	Safeguarding Vulnerable Groups Act 2006 (legislation.gov.uk)
Working Together to Safeguard Children 2018	Working together to safeguard children - GOV.UK (www.gov.uk)
Keeping Children Safe in Education 2021	Keeping children safe in education - GOV.UK (www.gov.uk)
Mental Health Act 1983 (amended 2007)	Mental Health Act 1983 (legislation.gov.uk)
Human Rights Act 1998	Human Rights Act 1998 (legislation.gov.uk)
GDPR and Data Protection Act 2018	Data protection - GOV.UK (www.gov.uk)
Information Sharing: Advice for Practitioners 2018	Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)

Sexual Violence and Sexual Harassment between Children in Schools and Colleges 2018	Sexual violence and sexual harassment between children in schools and colleges - GOV.UK (www.gov.uk)
Criminal Exploitation of Children & Vulnerable Adults: County Lines Guidance	Criminal exploitation of children and vulnerable adults: county lines - GOV.UK (www.gov.uk)
Online Abuse & Bullying Prevention Guidance	Online abuse and bullying prevention guide - GOV.UK (www.gov.uk)
Coronavirus (COVID-19) Safeguarding in Schools, Colleges and Other Providers 2020	Coronavirus (COVID-19): safeguarding in schools, colleges and other providers - GOV.UK (www.gov.uk)
Counter-Terrorism and Security Act 2015	Counter-Terrorism and Security Act - GOV.UK (www.gov.uk)
Prevent Duty Guidance 2015	Prevent duty guidance - GOV.UK (www.gov.uk)
Serious Crime Act 2015	Serious Crime Act 2015 (legislation.gov.uk)
Preventing Youth Violence & Gang Involvement	Preventing youth violence and gang involvement - Practical advice for schools and colleges (publishing.service.gov.uk)
Wigan Safeguarding Children Board Policy	Guidance and policies (wiganlscb.com)
Wigan Safeguarding Adults Board Policy	Wigan policy and procedure (wigansafeguardingadults.org)