



Safeguarding (Child Protection) Policy

Brilliant Play is committed to building a 'culture of safety' in which the children in our care are protected from abuse, harm and radicalisation. Please also refer to the Risk Benefit Assessment, Staff and Volunteer Behaviour and Physical Contact Policies.

Brilliant Play will respond promptly and appropriately to all incidents or concerns regarding the safety of a child that may occur. Child protection procedures comply with all relevant legislation and with guidance issued by the Local Safeguarding Children Board (LSCB). There will be a Designated Safeguarding Lead (DSL) available at all times while sessions are taking place. The DSL coordinates child protection issues and liaises with external agencies (eg Social Care, the LSCB and Ofsted).

Brilliant Play's Designated Safeguarding Leads are; are Claire Chapman, Marble Hill Playcentres Lead (Senior DSL), Scott Greig-Hardie Forest School Lead (Deputy DSL).

Child abuse and neglect

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. An individual may abuse or neglect a child directly, or by failing to protect them from harm. Some forms of child abuse and neglect are listed below.

- **Emotional abuse** is the persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve making the child feel that they are worthless, unloved, or inadequate. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
- **Physical abuse** can involve hitting, shaking, throwing, poisoning, burning, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may be also caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child.
- **Sexual abuse** involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This can involve physical contact, or non-contact activities such as showing children sexual activities or encouraging them to behave in sexually inappropriate ways.
- **Neglect** is the persistent failure to meet a child's basic physical and emotional needs. It can involve a failure to provide adequate food, clothing and shelter, to protect a child from physical and emotional harm, to ensure adequate supervision or to allow access to medical treatment.

Signs of child abuse and neglect

Signs of possible abuse and neglect may include:

- significant changes in a child's behaviour
- deterioration in a child's general well-being
- unexplained bruising or marks
- comments made by a child which give cause for concern
- inappropriate behaviour displayed by a member of staff, or any other person. For example, inappropriate sexual comments, excessive one-to-one attention beyond the requirements of their role, or inappropriate sharing of images.

Some children may be more vulnerable to abuse or neglect. Consider whether the following applies:

- The child has additional needs or a disability
- The child holds immigrant status
- Looked after or previously looked after
- having prior experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- social isolation or social difficulties
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other people involved in gangs
- having mental health or substance misuse issue
- being excluded from mainstream education, in particular attending a Pupil Referral Unit

If abuse is suspected or disclosed

When a child makes a disclosure to a member of staff or volunteer, that member of staff or volunteer will:

- reassure the child that they were not to blame and were right to speak out
- listen to the child but not question them
- give reassurance that the staff member or volunteer will take action
- record the incident as soon as possible (see *Logging an incident* below).

If a member of staff or volunteer witnesses or suspects abuse, they will record the matter straightaway using the **Logging a concern** form. If a third party expresses concern that a child



is being abused, we will encourage them to contact Social Care directly. If they will not do so, we will explain that the Club is obliged to and the incident will be logged accordingly.

If a child makes a direct disclosure to you:

Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down. Accept what is being said without judgement. Take it seriously.

Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now".

Reassure the child that they did nothing wrong and that you take what is said seriously. Don't promise confidentiality - never agree to keep secrets. You have a duty to report your concerns. Tell the child that you will need to tell some people, but only those whose job it is to protect children. Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

Listen quietly, carefully and patiently. Do not assume anything - don't speculate or jump to conclusions.

Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions.

Do ask open questions like "Is there anything else that you want to tell me?"

Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English.

Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to. Refer directly to the designated safeguarding lead in your organisation (as set out in the child protection policy).

Do not discuss the case with anyone else

Make some notes at the time if you can and write them up in detail as soon as possible on a logging a concern form.

Do not destroy your original notes in case they are required in Court.

Record the date, time, place, words used by the child and how the child appeared to you - be specific. Record the actual words used; including any swear words or slang.

Record statements and observable things, not your interpretations or assumptions - keep it factual.

If you have a concern about a colleague

All staff and volunteers have a duty to disclose any concerns they have about the conduct of other staff or adults in contact with children. An allegation of child abuse made against a member of staff or volunteer (within the work environment or outside of work) or other adult in contact with children in the setting may come from a parent, another member of staff, volunteer or from a child's disclosure.

The setting will:

- Treat the matter seriously.
- Avoid asking leading questions.
- Keep an open mind.
- Make a written record of the information that includes: when the alleged incident took place (time and date), who was present, and what was said to have happened.
- Sign and date the written record.
- Report the matter immediately to the Designated Safeguarding and Child Protection person, or named deputy, where the designated person is the subject of an allegation. If your concern is about the DSL contact Single Point of Access (SPA) directly yourself. Please also see the **Whistleblowing Policy**.
- Contact Single Point of Access (SPA) for advice and further guidance, who will contact The Local Authority Designated Officer (LADO), and cooperate fully with the process of the SPA team and with any Police investigations (The LADO will offer advice and guidance in relation to members of staff or volunteers working in Richmond upon Thames regardless where the child lives).
- Follow the settings disciplinary procedure. Due to the serious nature of the concerns, staff may be suspended until a full investigation has taken place. Volunteers will have their placement suspended. The setting will support and treat with respect the member of staff or volunteer whilst suspended.
- Await the outcome of the investigation before taking further disciplinary action.
- Ensure, if it appears from the results of the investigation that the allegations are justified, that disciplinary action will follow, taking legal advice where necessary.
- Where it seems likely that 'on balance of probabilities' abuse may have taken place, be able in law to dismiss the individual and refer them to The Disclosure and Barring Service (DBS).
- If the result of the investigation is that it was a false allegation, give the individual appropriate support.

Support for those involved in a child protection issue

Child neglect and abuse is devastating for the child and can also result in distress and anxiety for staff or volunteers who become involved.

- We will support the children, their families and staff /volunteers by:
- Taking all suspicions and disclosures seriously.

- Responding sympathetically to any request from a member of staff or volunteer for time out to deal with distress or anxiety.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- Storing records securely.
- Offering details of help lines, counselling or other avenues of external support.
- Following the procedures laid down in our whistle blowing, complaints and disciplinary procedures.
- Cooperating fully with relevant statutory agencies.

Peer-on-peer abuse

Children are vulnerable to abuse by their peers. Peer-on-peer abuse is taken seriously by staff and volunteers and will be subject to the same child protection procedures as other forms of abuse. Staff and volunteers may refer to the [Brook Traffic Light system](#) tool to make decisions about appropriate and inappropriate behaviour within age groups. Staff and volunteers are aware of the potential uses of information technology for bullying and abusive behaviour between young people.

Staff and volunteers will not dismiss abusive behaviour as normal between young people. The presence of one or more of the following in relationships between children should always trigger concern about the possibility of peer-on-peer abuse:

- Sexual activity (in primary school-aged children) of any kind, including sexting
- One of the children is significantly more dominant than the other (eg much older)
- One of the children is significantly more vulnerable than the other (eg in terms of disability, confidence, physical strength)
- There has been some use of threats, bribes or coercion to ensure compliance or secrecy.

If peer-on-peer abuse is suspected or disclosed

We will follow the same procedures as set out above for responding to child abuse.

Child sexual exploitation (CSE)

Brilliant Play follows the London Child Protection Procedures for safeguarding children from sexual exploitation. Safeguarding Children from Sexual Exploitation

In February 2017, the government updated the working definition of child sexual exploitation.

Child sexual exploitation definition and guide

“Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.”

Child sexual exploitation is a form of child sexual abuse affecting boys and girls. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

Child sexual exploitation may occur without the child being aware of events or understanding that these constitute abuse.

Child sexual exploitation is never the victim’s fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

Child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex
- can still be abuse even if the sexual activity appears consensual
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- can take place in person or via technology, or a combination of both
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- may occur without the child’s or young person’s immediate knowledge (through others copying videos or images they have created and posting on social media, for example)
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other



factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources

Consent

Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation) consent cannot legally be given whatever the age of the child.

Key factor in child sexual exploitation

Child sexual exploitation involves some form of exchange (sexual activity in return for something) between the victim and/or perpetrator or facilitator. Where there is no such exchange, for example, where the gain for the perpetrator is sexual gratification (or the exercise of power or control), this is described as sexual abuse (and not exploitation).

The exchange can include both tangible (such as money, drugs or alcohol) and intangible rewards (such as status, protection or perceived receipt of love or affection). The receipt of something by a child/young person does not make them any less of a victim.

It is also important to note that the prevention of something negative can also fulfil the definition of exchange, for example a child who engages in sexual activity to stop someone carrying out a threat to harm his/her family.

Links to other kinds of crime

- child trafficking
- domestic abuse
- sexual violence in intimate relationships
- grooming (including online grooming)
- abusive images of children and their distribution • drugs-related offences
- gang-related activity
- immigration-related offences
- domestic servitude

Potential vulnerabilities.

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- having a prior experience of neglect, physical and/or sexual abuse
- lack of a safe or stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- recent bereavement or loss
- social isolation or social difficulties
- absence of a safe environment to explore sexuality
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other children and young people who are being sexually exploited
- family members or other connections involved in adult sex work
- having a physical or learning disability
- being in care (particularly those in residential care and those with interrupted care histories).
- sexual identity

Possible indicators of child sexual exploitation

- acquisition of money, clothes, mobile phones, etc, without plausible explanation.
- gang association and/or isolation from peers and social networks.
- exclusion or unexplained absences from school, college or work.
- leaving home or care without explanation and persistently going missing or returning late.
- excessive receipt of texts or phone calls.
- returning home under the influence of drugs or alcohol.
- inappropriate sexualised behaviour for age or sexually transmitted infections.
- evidence of or suspicions of physical or sexual assault.
- relationships with controlling or significantly older individuals or groups.
- multiple callers (unknown adults or peers).
- frequenting areas known for sex work.
- concerning use of the internet or other social media.
- increasing secretiveness around behaviours.
- self-harm or significant changes in emotional wellbeing.
- online exploitation.

All young people are at risk from online exploitation and can be unaware that this is happening. Online exploitation includes the exchange of sexual communication or images and can be particularly challenging to identify and respond to. Children, young people and perpetrators are frequently more familiar with, and spend more time in, these environments than their parents and carers.

Online child sexual exploitation allows perpetrators to initiate contact with multiple potential victims and offers a perception of anonymity. Where exploitation does occur online, the



transfer of images can be quickly and easily shared with others which makes it difficult to contain the potential for further abuse.

Children may be perpetrators of abuse

It must be recognised that children may also be perpetrators of abuse, sometimes at the same time as being abused themselves.

Child Criminal Exploitation

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. [Serious Violence Strategy 2018, Home Office](#).

Defining a gang

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 places to socialise. Although some peer group gatherings can lead to increased antisocial behaviour and youth offending, these activities should not be confused with the serious violence of a street gang.

A street gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity. A street gang will engage in criminal activity and violence and may lay claim over territory (not necessarily geographical but it can include an illegal economy territory). They have some form of identifying structure featuring a hierarchy usually based on age, physical strength, and propensity to violence or older sibling rank. There may be certain rites involving antisocial or criminal behaviour or sex acts in order to become part of the gang. They are in conflict with other similar gangs.

While there is a distinction between organised crime groups and street gangs based on the level of criminality, organisation, planning and control, there may be significant links between different levels of gangs. For example street gangs can be involved in drug dealing on behalf of organised criminal groups. Young men and women may be at risk of sexual exploitation in these groups.

Children may be involved in more than one 'gang', with some cross-border movement, and may not stay in a 'gang' for significant periods of time. Children rarely use the term 'gang', instead they used terms such as 'family', 'breddrin', 'crews', 'cuz' (cousins), 'my boys' or simply 'the people I grew up with'.

An Organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise). This involves serious and organised criminality by a core of violent gang members who exploit vulnerable young people and adults. This may also involve the movement and selling of drugs and money across the country, known as county lines.

County Lines

This is so called because it extends across county boundaries and is coordinated by the use of dedicated mobile phone lines. It is a tactic used by groups or gangs to facilitate the selling of drugs in an area outside of the area in which they live, which reduces their risk of detection. Selling drugs across county lines often involves the criminal exploitation of children and young people. Child criminal exploitation, like other forms of abuse and exploitation, is a safeguarding concern and constitutes abuse even if the young person appears to have readily become involved. Child criminal exploitation is typified by some form of power imbalance in favour of those perpetrating the exploitation and usually involves some form of exchange (e.g. carrying drugs in return for something). The exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection). Young people who are criminally exploited are at a high risk of experiencing violence and intimidation and threats to family members may also be made. Gangs may also target vulnerable adults and take over their premises to distribute Class A drugs in a practice referred to as 'cuckooing'.

Children and young people can become indebted to gangs/groups and exploited in order to pay off debts. Those who are criminally exploited often go missing travelling to other towns often by rail but sometimes car or coach (some of which can be great distances from their home addresses). They may have unexplained increases in money or possessions, be in receipt of additional mobile phone and receive excessive texts or phone calls.

White British children are often targeted because gangs perceive they are more likely to evade police detection and some children may be as young as 12 although 15 to 16 years old is the most common age range. The young people involved may not recognise themselves as victims of any abuse, and can be used to recruit other young people.

It is important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person or vulnerable adult does not make them any less of a victim. If a young person is

arrested for drugs offences a long way from home in an area where they have no local connections and no obvious means of getting home, this should trigger questions about their welfare and they should potentially be considered as victims of child criminal exploitation and trafficking rather than as an offender. Agencies also need to be proactive and make contact with statutory services in the young person's home area to share information.

- Child withdrawn from family;
- Sudden loss of interest in school or change in behaviour. Decline in attendance or academic achievement (although it should be noted that some gang members will maintain a good attendance record to avoid coming to notice);
- Being emotionally 'switched off', but also containing frustration / rage;
- Starting to use new or unknown slang words;
- Holding unexplained money or possessions;
- Staying out unusually late without reason, or breaking parental rules consistently;
- Sudden change in appearance - dressing in a particular style or 'uniform' similar to that of other young people they hang around with, including a particular colour;
- New tattoos with gang style symbols
- Dropping out of positive activities;
- New nickname;
- Unexplained physical injuries, and/or refusal to seek / receive medical treatment for injuries;
- Graffiti style 'tags' on possessions, school books, walls;
- Constantly talking about another young person who seems to have a lot of influence over them;
- Breaking off with old friends and hanging around with one group of people;
- Associating with known or suspected gang members, closeness to siblings or adults in the family who are gang members;
- Starting to adopt certain codes of group behaviour e.g. ways of talking and hand signs;
- Going missing;
- Being found by Police in towns or cities many miles from their home;
- Expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past;
- Being scared when entering certain areas; and
- Concerned by the presence of unknown youths in their neighbourhoods.

A referral must be made as soon as possible when any concern of Significant Harm as a consequence of gang activity including child criminal exploitation becomes known. Any agency or practitioner who has concerns that a child may be at risk of harm



should contact the Single Point of Access or the police for the area in which the child is currently located. If there is concern about a child's immediate safety, the Police should be contacted on 999.

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without their permission or knowledge, with the intention of viewing parts of their body or clothing, not otherwise visible, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery. Incidences of upskirting are a safeguarding matter under child protection procedures. All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sexting.

Honour based violence

Honour based violence' (HBV) is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community. HBV can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. It is a violation of human rights and may be a form of domestic and/or sexual violence. There is no, and cannot be, honour or justification for abusing the human rights of others.

Forced Marriage (FM)

A Forced Marriage (FM) is a marriage conducted without the valid consent of one or both parties and where duress is a factor. FM is now a specific offence under s121 of

the Anti-Social Behaviour, Crime and Policing Act 2014 and came into force on 16 June 2014.

The factors outlined below, collectively or individually, may be an indication that a young person fears they may be forced to marry, or that a forced marriage has already taken place. (It should not however be assumed that a young person is facing forced marriage simply on the basis that they present with one or more of these factors).

- **Family History;**
 - Siblings forced to marry;
 - Family disputes;
 - Domestic violence and abuse;
 - Running away from home;
 - Unreasonable restrictions e.g. house arrest;
- **Education;**
 - Truancy;
 - Low Motivation/changes in motivation;
 - Poor exam results;
 - Withdrawal from school life;
- **Health;**
 - Self-harm;
 - Attempted suicide;
 - Eating disorders;
 - Depression;
 - Isolation;
- **Employment;**
 - Poor performance;
 - Poor attendance;
 - Limited career choices;

Not allowed to work;

Unreasonable financial control e.g. confiscation of wages/income.

Reports of forced marriage, including reports from victims who fear they may be forced to marry, must be taken seriously. For young people under the age of 18 years, it will be appropriate to deal with the situation as a child protection issue and refer to the DSL or SPA.

Domestic abuse

Domestic abuse is sometimes also referred to as domestic violence and can be defined as:

'An incident or a pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse. It concerns people aged 16 or over who are or have been intimate partners or family members and it can happen regardless of your gender or sexuality'.

Domestic abuse can include, but is not limited to, the following types of abuse: psychological, emotional, physical, sexual and financial. It also includes what is known as 'honour' based violence, female genital mutilation (FGM) and forced marriage.

Domestic violence affects people of every class, gender, level of wealth, geography, age, race, disability and sexuality. The violence can begin at any stage of the relationship and may continue after the relationship has ended. It is a pattern of controlling and aggressive behaviour that is intentional and calculated to exercise power and control within a relationship.

Domestic abuse can be emotional, physical, sexual, financial or psychological, such as:

- kicking, hitting, punching or cutting
- rape (including in a relationship)

- controlling someone's finances by withholding money or stopping someone earning
- controlling behaviour, like telling someone where they can go and what they can wear
- not letting someone leave the house
- reading emails, text messages or letters
- threatening to kill someone or harm them
- threatening another family member or pet.

Signs of domestic abuse

It can be difficult to tell if domestic abuse is happening and those carrying out the abuse can act very different when other people are around. Children and young people might also feel frightened and confused, keeping the abuse to themselves.

Signs that a child has witnessed domestic abuse can include:

- aggression or [bullying](#)
- anti-social behaviour, like vandalism
- [anxiety, depression or suicidal thoughts](#)
- attention seeking
- bed-wetting, nightmares or insomnia
- constant or regular sickness, like colds, headaches and mouth ulcers
- [drug or alcohol use](#)
- eating disorders
- problems in school or trouble learning
- tantrums
- withdrawal.



Witnessing domestic abuse can have a serious and long lasting impact on a child's physical and emotional well being. If a child discloses to you that this is happening it is important to listen carefully and follow the procedure outlined in this policy for disclosures. You should NOT confront the abuser but make an immediate referral to SPA. If you believe the child to be in imminent danger you should call 999.

Female genital mutilation (FGM)

Female genital mutilation (FGM) is a form of child abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

- FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so staff and volunteers should be aware of risk indicators. These risk indicators may include:
 - children talking about getting ready for a special ceremony
 - family taking a long trip abroad
 - child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Gambia, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia 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 such procedures are carried out abroad and staff and volunteers will be particularly alert to suspicions or concerns expressed by a female about going on a long holiday during the summer holiday period. Staff and volunteers should be aware that it is also possible for these procedures to be undertaken in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both. (See Female Genital Mutilation Statutory Guidance and Kingston and Richmond Safeguarding Children Partnership FGM Policy for further information).

[https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/media/upload/fck/file/Kingston%20and%20Richmond%20LSCB%20FGM%20Policy%20Updated%202019%20F%20June%202019\(1\).pdf](https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/media/upload/fck/file/Kingston%20and%20Richmond%20LSCB%20FGM%20Policy%20Updated%202019%20F%20June%202019(1).pdf)



If staff or volunteers have a concern that a girl may be at risk of FGM, they will record their concern and inform the Designated Safeguarding and Child Protection Officer immediately.

Signs that may indicate a child has undergone FGM:

- prolonged absence from school and other activities
- behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- bladder or menstrual problems
- finding it difficult to sit still and looking uncomfortable
- complaining about pain between the legs
- mentioning something somebody did to them that they are not allowed to talk about
- secretive behaviour, including isolating themselves from the group
- reluctance to take part in physical activity
- repeated urinary tract infection

The individual who becomes aware of a case of FGM will record their concerns on the safeguarding reporting form and inform the Designated Safeguarding Lead and Child Protection Officer who will support staff and volunteers in making a direct report to the police. If staff members or volunteers have reason to believe that a girl is at imminent risk of FGM due to an upcoming trip out of the country they must make an immediate urgent referral via 101. Social care and the Police will decide on the course of action which may take the form of an FGM protection order or Emergency Protection Order.

There are no circumstances in which a member of staff or volunteer will examine a girl.

Extremism and radicalisation

All childcare settings have a legal duty to protect children from the risk of radicalisation and being drawn into extremism. There are many reasons why a child might be vulnerable to radicalisation, eg:

- feeling alienated or alone
- seeking a sense of identity or individuality
- suffering from mental health issues such as depression
- desire for adventure or wanting to be part of a larger cause
- associating with others who hold extremist beliefs

Signs of radicalisation

Signs that a child might be at risk of radicalisation include:

- changes in behaviour, for example becoming withdrawn or aggressive
- claiming that terrorist attacks and violence are justified

- viewing violent extremist material online
- possessing or sharing violent extremist material
- Becoming increasingly argumentative
- Refusing to listen to different points of view
- Unwilling to engage with children who are different
- Becoming abusive to children who are different
- Embracing conspiracy theories
- Feeling persecuted
- Changing friends and appearance
- Distancing themselves from old friends
- No longer doing things they used to enjoy
- Converting to a new religion
- Being secretive and reluctant to discuss their whereabouts
- Sympathetic to extremist ideologies and groups

Online behaviour

- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Accessing extremist online content
- Joining or trying to join an extremist organisation

Staff and volunteers should be vigilant that parents, carers, staff, volunteers and visitors can radicalise children any concerns must be reported immediately to the DSL who will refer to LADO.

If a member of staff or volunteer suspects that a child is at risk of becoming radicalised, they will record any relevant information or observations on a **Logging a concern** form, and refer the matter to the DSL.

Logging a concern

All information about the suspected abuse or disclosure, or concern about radicalisation, will be recorded on the **Logging a concern** form as soon as possible after the event. The record should include:

- date of the disclosure, or the incident, or the observation causing concern
- date and time at which the record was made
- name and date of birth of the child involved



- a factual report of what happened. If recording a disclosure, you must use the child's own words
- name, signature and job title of the person making the record.

The record will be given to the DSL who will decide on the appropriate course of action. If the DSL is unavailable you should contact the Richmond Single Point of Access for further advice as soon as possible.

For concerns about **child abuse**, the DSL will contact Social Care. The DSL will follow up all referrals to Social Care in writing within 48 hours. If a member of staff or volunteer thinks that the incident has not been dealt with properly, they may contact Social Care directly.

For concerns regarding **radicalisation**, the DSL will contact the Local Safeguarding Children Board (LSCB). For more serious concerns the DSL will contact the Police on the non-emergency number (101), or the anti-terrorist hotline on 0800 789 321 or by filling out their contact form found here: <https://www.mi5.gov.uk/contact-us>. For urgent concerns where life is in danger the DSL will contact the Police using 999.

Conflicts of interest

A conflict of interest is a situation in which an individual has competing interests or loyalties. A conflict of interest can exist in several kinds of situations: with a public official whose personal interests conflict with his/her professional position with an employee who works for one company but who may have personal interests that compete with his/her employment, with a person who has a position of authority in one organisation that conflicts with his or her interests in another organisation with a person who has conflicting responsibilities.

Examples:

A member of staff or volunteer is related to a child within the provision, the Manager of the provision has a close friendship with one of the families, a member of staff or volunteer holds a second employment, member of staff or volunteers has connection with families within their workplace through social networking, a member of staff provides baby sitting services for a family of the provision.

A close relationship is defined as such by virtue of association, which is a family relationship, personal partnership, civil partnership or marriage. This may also apply to close friendships, guardianships (Godparent) or business partners.

Employees have a duty to disclose any potential or apparent conflict of interest, which may affect their ability to carry out their role. Any member of staff or volunteer who believes that they

may have a conflict of interest should consult their Line Manager and complete a declaration of conflict of interest form.

Professional Boundaries

We expect a staff and volunteers to maintain robust professional boundaries. As such:

- Staff and volunteers should understand their responsibilities to safeguard and promote the welfare of children
- Staff and volunteers are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Staff and volunteers should work, and be seen to work, in an open and transparent way
- Staff and volunteers should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded
- Staff and volunteers should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern
- Staff and volunteers should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation
- Staff and volunteers should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children
- Staff and volunteers should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity
- Staff and managers should continually monitor and review practice to ensure this guidance is followed
- Staff and volunteers should be aware of and understand their establishment's child protection policy, arrangements for managing allegations against staff, staff behaviour policy, whistle blowing procedure and the procedures of the Single Point of Access

Sharing information with parents and carers

It is good practice that we work in partnership with parents and carers. This means that in general we should share information with other agencies with the parents' knowledge and consent. When we feel that a referral should be made to social care, they should seek the consent of the parent. However, the duty to refer overrides this, as the safety of the child is paramount.

Seeking consent is not required, if to do so would:

- place a person at increased risk of harm (usually the child, but also a family member or another person);



- prejudice the prevention, detection or prosecution of a serious crime; or lead to an unjustifiable delay in making enquiries.

Brilliant Play must record the request for consent and the outcome. Where the parent refuses consent or is not asked, we must record the decision to share information without consent and give the reasons.

Allegations against staff and volunteers

If anyone makes an allegation of child abuse against a member of staff or volunteers:

- The allegation will be recorded on an **Incident record** form. Any witnesses to the incident should sign and date the entry to confirm it.
- The allegation must be reported to the Local Authority Designated Officer (LADO) and to Ofsted. The LADO will advise if other agencies (e.g. police) should be informed, and Brilliant Play will act upon their advice. Any telephone reports to the LADO will be followed up in writing within 48 hours.
- Following advice from the LADO, it may be necessary to suspend the member of staff or volunteer pending full investigation of the allegation.
- If appropriate Brilliant Play will make a referral to the Disclosure and Barring Service.

Promoting awareness among staff and volunteers

Brilliant Play promotes awareness of child abuse and the risk of radicalisation through its staff and volunteers training.

Brilliant Play ensures that:

- the designated DSL has relevant experience and receives appropriate training in safeguarding and the Prevent Duty, and is aware of the Channel Programme and how to access it
- designated person training is refreshed every two years.
- safe recruitment practices are followed for all new staff and volunteers
- all staff and volunteers have a copy of this **Safeguarding (Child Protection) policy**, understand its contents and are vigilant to signs of abuse, neglect or radicalisation
- all staff and volunteers are aware of their statutory duties with regard to the disclosure or discovery of child abuse, and concerns about radicalisation
- all staff and volunteers receive basic safeguarding training, and safeguarding is a permanent agenda item at all staff meetings
- Staff will revisit basic training annually
- all staff and volunteers receive basic training in the Prevent Duty



- staff and volunteers are familiar with the Safeguarding File and its location online and know how to report concerns about their line manager confidently
- Brilliant Play procedures are in line with the guidance in [‘Working Together to Safeguard Children \(2018\)’](#) and staff and volunteers are familiar with the guidance in [‘What To Do If You’re Worried A Child Is Being Abused \(2015\)’](#).

Related Policies.

Please see the following policies which should be read in conjunction with the Safeguarding (Child Protection) policy.

- Administering Medication
- Behaviour Management
- Confidentiality
- Equalities
- Health & Safety
- Illness & Accidents
- Physical Contact
- Safer Recruitment
- Staff Behaviour
- Whistleblowing

Contact numbers

Richmond Single Point of Access

From 8am to 5.15pm, Monday to Thursday, and 8am to 5pm on Friday call **020 8547 5008**.

Out of hours, phone **020 8770 5000**

Social Care: **020 8891 7969**

Social Care out of hours contact: **020 8770 5000**

LADO (Local Authority Designated Officer): **020 8891 7969**

Kingston and Richmond Safeguarding Children Partnership: 07834 386459

Police: 101 (non-emergency) or 999 (emergency)

Anti-terrorist hotline: **0800 789 321**

NSPCC: **0808 800 500**

Ofsted: **0300 123 1231**

This policy was adopted by: Brilliant Play CiC	Date: 29 Nov 2020
To be reviewed: Nov 2021	Signed: C.Chapman Signed: S.Hardie

