

Safeguarding Policy

DESIGNATED SAFEGUARDING LEADS

YMCA Campus Stage 1, 2 & 3 & Move-On Accommodation

Supported Housing Manager

Derngate Stage 1, 2 & 3

Supported Housing Manager

Youth & Community

Youth & Community Manager

Trustee Safeguarding Lead



**Here for young people
Here for communities
Here for you**

YMCA enables people to develop their full potential in mind, body and spirit. Inspired by, and faithful to, our Christian values, we create supportive, inclusive and energising communities, where young people can truly belong, contribute and thrive.

FAMILY & YOUTH WORK

HEALTH & WELLBEING

HOUSING

TRAINING & EDUCATION

SUPPORT & ADVICE

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INTRODUCTION

At YMCA Milton Keynes and Northamptonshire (YMCA MK & N), young people are at the heart of everything that we do, and we follow a clear vision and mission to ensure that we always put young people first.

Our mission is to provide young people in Milton Keynes & Northamptonshire with a safe place they can stay, people they can trust, and support to fulfil their potential.

We are committed to ensuring that all staff understand the types of abuse that may occur and what they should do if they suspect abuse is integral to delivering our mission. This policy applies to both adults and children. It sets out YMCA MK & N's duties, responsibilities, and approach to abuse, including what staff should do if they suspect abuse and how YMCA MK & N can enable and empower the young people that they serve.

OUR SAFEGUARDING PRINCIPLES

To effectively safeguard our young people, all YMCA staff that interact with young people in any way must understand the forms of abuse and the correct action to take if they suspect abuse.

Empowerment: YMCA MK & N does all it can to support and encourage our young people to make their own decisions, and consider their own well-being, safety and security.

Prevention: The services that YMCA MK & N provides are designed and managed in a way that promotes well-being, safety and security, takes a proportionate approach to minimise the opportunity for abuse to occur and ensures that where possible action is taken before harm is done.

Proportionality: Any safeguarding action taken will be the least intrusive response appropriate to the risk.

Protection: If abuse is suspected or reported, YMCA MK & N will act effectively and ensure that all actions are in the best interests of that young person. For adults this includes finding out what safe means to the individual affected, and how best to achieve it.

Partnership: YMCA MK & N staff work with other professionals and the individual. Confidentiality will always be respected and any information relating to abuse will only be shared with relevant staff members and/or the relevant authority.

Accountability: YMCA MK & N is transparent in its processes to deliver safeguarding. The Board of Trustees (the Board) is responsible for oversight and good governance of YMCA MK & N. The Board appoints one of its members as Safeguarding Lead to ensure the safeguarding policy is reviewed annually and all changes approved by the Board for implementation. The Trustee lead on safeguarding will meet regularly with the staff safeguarding

lead and ensure that reports on safeguarding are regularly provided to the Board.

In addition, the principles underlying safeguarding of children are:

- protecting children from abuse and maltreatment
- preventing impairment to children's health or development ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcome.

This safeguarding policy is in place to protect children, young people, and staff.

1. POLICY STATEMENT AND PRINCIPLES

The organisation's safeguarding arrangements are annually reviewed by the Trustees.

This policy is available on our website and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work with us. This policy is audited quarterly and renewed annually. This policy, and others, are available on PeopleLog.

a. Safeguarding Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all young people with utmost importance. We endeavour to provide a safe and welcoming environment where young people are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that young people receive effective support, protection and justice.

b. Policy Principles

YMCA MK & N has a responsibility and is committed to safeguarding and promoting the welfare of young people and expects all staff and volunteers to share this commitment.

All young people, regardless of age, gender, ability, culture, race, language, faith, sexual identity or socio-economic status have equal rights to protection. Young people who are safe and feel safe are better equipped to get involved in activities.

All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or when participating in an activity.

All staff members, in relation to safeguarding, will maintain an attitude of 'It could happen here'. When concerned about the welfare of a child or young person, staff members should always act in the best interests of the individual.

Young people and staff involved in safeguarding issues will receive appropriate support.

In summary, the aims of this policy are to provide all staff with the necessary information to enable them to meet their safeguarding responsibilities whilst also safeguarding themselves and the organisation.

This policy will be reviewed at least annually unless an incident, new legislation or guidance suggests the need for an interim review.

2. SAFEGUARDING LEGISLATION AND GUIDANCE

Safeguarding and promoting the welfare of young people refers to the process of protecting young people from maltreatment, preventing the impairment of health or development, ensuring that young people grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all young people to have the best outcomes.

Child protection refers to the processes undertaken to protect young people who have been identified as suffering or being at risk of suffering significant harm.

Adult Safeguarding refers to the processes undertaken to protect those over the age of 18 who have been identified as suffering or being at risk of suffering significant harm.

Staff refers to all those working for or on our behalf, full-time or part-time, temporary or permanent, in either a paid or voluntary capacity.

Young people includes everyone under the age of 35.

Parent refers to birth parents and other adults who are in a parenting role; for example, step-parents, foster carers and adoptive parents.

- Services provided by YMCA MK are diverse in their nature and setting, as such, a few different legislative documents apply:
- **Working to Safeguard Children (2023)**
- **Keeping Young People Safe in Education (DfE 2023)** issued under Section 175 of the Education Act 2002.
- **What to do if you're worried a child is being abused (2015) - Advice for practitioners** is non-statutory advice which helps everyone who works with young people to identify abuse and neglect and take appropriate action. A copy can be found with the operations team or via link in Appendix 1.
- **The Care Act 2014**
- **Contextual Safeguarding** is an approach to understanding and responding to children's experiences of significant harm beyond their family and home. This approach recognises the different relationships children have in their schools, peer groups, online and in their community. Developed by Dr Firmin at the University of Bedfordshire's Contextual Safeguarding Network, Contextual Safeguarding, as a framework for child protection, was built to meet the needs of children harmed outside of the family context, something that the current systems of child protection, and the system of safeguarding children overall, is unable to do effectively. Whilst much more detailed information can be found at www.contextualsafeguarding.org.uk, Contextual Safeguarding, and safeguarding against extra-familial harms more widely, are now written into both **Working Together to Safeguard Children 2023 (p34)** and **Keeping Children Safe in Education 2023 (p17)**.

Practices within Contextual Safeguarding guidance can be used more broadly, across YMCA's cohort.

- As such, information about contexts in which children and young people experience harm needs to be recorded and reported where appropriate.

3. ROLES AND RESPONSIBILITIES

a. The Designated Safeguarding Lead (DSL) *:

The role of the Designated Safeguarding Lead(s) is to deal with all instances involving children, young people and adult protection that may arise within the organisation. They or their Deputy will respond to all safeguarding concerns and enquiries. In the extreme circumstance that the relevant Designated Safeguarding Lead is not available, the Director of Youth & Community can be contacted as their Deputy. Their responsibilities are monitoring and recording concerns, making referrals to social care, or police as relevant, liaison with other agencies and arranging training for all staff. The Designated Safeguarding Leads and Deputies are recorded at Appendix A.

b. The Board of Trustees

As the Board of Trustees are legally responsible for the charity it is of the utmost importance that all members of the Board are aware of the importance of safeguarding, and their personal and collective responsibility to ensure that YMCA MK & N is operating to the highest of standards. All Trustees are required to attend annual safeguarding training, and the topic of Safeguarding must be a standing item at every Board meeting. The Board of Trustees will work closely with the staff safeguarding lead to ensure that all DSL/DDSL are fully equipped to complete their duties.

It is the responsibility of the Board of Trustees to ensure that our safeguarding, recruitment and managing allegations procedures take into account the procedures and practice of national guidance.

c. The Chief Executive Officer (CEO):

As the leader of the charity, the CEO is to provide full backing and support to the Designated Safeguarding Lead(s) ensuring that Safeguarding policy and procedures are understood and implemented by all staff and volunteers. It is the CEO's responsibility to keep the Board of Trustees informed of any concerns relating to safeguarding that may affect the credibility of the charity.

4. GOOD PRACTICE GUIDELINES

Young people may turn to a trusted adult when they are in distress or at risk. In order to meet and maintain our responsibilities towards young people we need to demonstrate standards of good practice which form a code of conduct for all staff.

Our practice principles are:

- Asset based
- Trauma informed
- Person centred
- Holistic

Good practice includes:

- Treating all young people with respect.
- Setting a good example by conducting ourselves appropriately.
- Involving young people in decisions that affect them.
- Encouraging positive, respectful and safe behaviour among young people.

Being a good listener:

- Being alert to changes in young people's behaviour and outward signs of abuse, neglect, exploitation and radicalisation.
- Being open and honest with young people and their carers/parents so they are aware that if you identify a safeguarding concern, you have a duty to report it, in accordance with organisational and local policy and procedures.
- Recognising that our Safeguarding Policy, Professional Boundaries Policy and other guidance documents are challenged by wider safeguarding issues. Examples include issues of bullying, physical contact, sexual exploitation, extremism, e-safety, and information-sharing.
- Asking the young person's permission before initiating physical contact, such as assisting with physical support or administering first aid whilst simultaneously ensuring that we adhere to our practice and policy guidelines.
- Maintaining appropriate standards of conversation and interaction with and between young people and avoiding the use of sexualised or derogatory language.
- Being aware that the personal and family circumstances and experiences of some young people lead to an increased risk of abuse.
- Applying the use of reasonable force and physical intervention only as a last resort and in compliance with our procedures and guidance.
- Referring all concerns about a young person's safety and welfare to the DSL or, if necessary, directly to the Multi-Agency Safeguarding Hub, Adult Social Services, or the Police. In the case of those young people with an allocated Personal Adviser (PA) or Social Worker (SW) this contact can be made directly to them or in their absence the duty PA/SW or relevant team manager.
- Following our rules with regard to communication and relationships with young people, including via social media in line with our Social Media Policy.
- Wherever possible, not to enter a room alone with a young person. If there is no other option, then to leave the door open with clear line of

sight to other staff and call for assistance. Be in staffing groups of two if the young person is under the age of 18, unless visible by another staff member, such as through an open or glass door.

5. ABUSE AND POSITION OF TRUST

- a) All staff are aware that inappropriate behaviour towards young people is unacceptable and that their conduct towards young persons must be beyond reproach, irrelevant of age of staff or young person
- b) In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of our staff and a young person under 18 may be a criminal offence, even if that young person is over the age of consent.

6. CONFIDENTIALITY AND INFORMATION SHARING

- a) All staff will understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the young person, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.
- b) Staff will ensure they maintain confidentiality and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, or outside agency as required (e.g Multi-Agency Safeguarding Hub, Adult Social Care).
- c) It is reasonable for staff to discuss day-to-day concerns about young people with colleagues in order to ensure that young people's general needs are met. However, it is not acceptable to do so without due cause, and staff should report all safeguarding concerns to the DSL or – in the case of concerns about the DSL – to their line manager. The person receiving the referral will then decide who else, if anyone, needs the information and they will disseminate it on a 'need-to-know' basis.
- d) With regard to informing parents and carers, if working with under 18s, we aim to work transparently and in the best interests of our young people. Normally we would look to keep parents and carers involved but this must be done with great care as involving parents/carers prematurely without consideration of the young person's right to privacy will most likely undermine the positive work done by staff to cultivate trusting relationships with the young person. We strongly recommend that if a worker feels the need to inform or involve a parent this must be first run through their direct line manager who may wish to seek advice from the DSL.
- e) The Care Act (2014) For the purposes of this policy, is the relevant act of parliament. The local authority is obliged to comply with the Care Act 2014 which also places a requirement on housing associations to assist local

authorities in their safeguarding obligations. The local authority has a duty to liaise with housing associations in this respect. YMCA MK & N will work in partnership with social services, the police and other agencies to achieve the best outcome for those affected.

- f) Our safeguarding duties under this policy apply to all residents and visitors to any of our premises. Any contractor, organisation or individual employed by, or using, YMCA MK & N premises or working directly with our young people will be required to have their own safeguarding policies and procedures or be willing to adhere to our policies and procedures.
- g) Working Together to Safeguard Children (2023) states, 'Fears about sharing information must not be allowed to stand in the way of the need to promote welfare and protect the safety of children'. This relates to any work, whether in the community, in school or in hospital work, where the young person is under the age of 18. Further guidance can be found on this subject by referring to the link in the appendix.
- h) 'The Information Sharing Agreement' recognises that the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018 (together, the "Data Protection Legislation") are not barriers to justified information sharing but rather ensure that information sharing is necessary, proportionate, relevant, adequate, accurate, timely and secure'.
- i) Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers, tablets or portable media such as a flash drive will be password protected or encrypted and kept in locked storage.

7. SAFEGUARDING PROCEDURES

a. Recognising Abuse

To ensure that our young people are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a young person by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other young people on young people ('peer on peer abuse'). The prevalence of peer-on-peer abuse is increasing. In relation to CSAE specifically, "52% of all Child Sexual Abuse and Exploitation (CSAE) cases involved reports of children (aged 10 to 17) offending against other children with 14 being the most common age" (VKPP, 2024)

There are four primary categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

An adult at risk is anyone aged 18 years and over who is, or may be, in need of community care services by reason of mental or other disability, age or

illness, and who is, or may be, unable to take care of himself or herself, or unable to protect himself or herself against significant harm of exploitation. Law commission (1995)

a. Physical Abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person known as 'Fabricated or Induced Illness' – FII (formerly known as 'Munchausen's Syndrome by Proxy').

b. Emotional Abuse

Emotional abuse is the **persistent** emotional maltreatment of a young person such as to cause severe and persistent adverse effects on the young person's emotional development. It may involve conveying to a young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on young people. These may include interactions that are beyond a young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another e.g. young person living in a domestic abusive environment. It may involve serious bullying (including cyber bullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people.

Some level of emotional abuse is involved in all types of maltreatment of a young person, although it may occur alone.

c. Sexual Abuse (Contact; Non-Contact)

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

e. Neglect

Neglect is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- Provide suitable education

Definitions taken from **Working together to Safeguard Children (2023)**

Adults may also show signs of self-neglect such as:

- Significant weight loss or gain;
- Lack of ability to maintain health & hygiene, room & personal;
- Lack of access to appropriate clothing;
- Malnutrition and/or dehydration;
- Lack of household maintenance;
- Hoarding and/or clutter;
- Inability to take medication or treat illness or injury.

In addition, adults may physically self-harm. This physical self-harm could be minor or could be life threatening. Each incident will therefore need to be assessed independently, and all incidents should be reported on MyConcern.

f. Indicators of Abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a young person has been inadequately supervised. The identification of physical signs is complicated, as young people may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of

certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a young person has been abused.

A young person who is being abused or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries
- Show signs of pain or discomfort
- Keep arms and legs covered, even in warm weather
- Be concerned about changing for PE or swimming
- Look unkempt and uncared for
- Change their eating habits
- Have difficulty in making or sustaining friendships
- Appear fearful
- Be reckless with regard to their own or other's safety
- Self-harm
- Frequently miss school or work, or arrive late
- Show signs of not wanting to go home
- Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- Challenge authority, possibly involved in criminal activity
- Become disinterested in their school work or work
- Be constantly tired or preoccupied
- Be wary of physical contact
- Be involved in, or particularly knowledgeable about drugs or alcohol (consider risk of County Lines/gang activity); and/or
- Display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development
- Acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the young person's family (consider risk of young person sexual or criminal exploitation)

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

g. Extra-familial harms

Extra familial harms, that is, harms that happen outside of the family/home context, are a significant concern for any safeguarding professional and have seen significant and alarming upward trends in recorded incidents. A recent study, **The YEF Children, Violence and Vulnerability Report (YEF, 2023)**, highlighted that, of children surveyed:

- 39% had been directly affected by violence in the last twelve months

- 55% had seen real life violence on social media in the last twelve months
- 65% had changed their behaviour as result of exposure to violence
- 14% had been absent from school for fear of violence

Extra-familial harms can include:

- Peer on peer abuse such as domestic abuse between young people, harmful sexual behaviour, sexual abuse, interpersonal violence and bullying.
- Online abuse - whether by peers or adults.
- Child Sexual Exploitation and abuse, whether involving peers or adults
- Child Criminal Exploitation, whether involving peers or adults, such as coerced drug distribution.
- Coerced fraudulent activities such as "squares" or "money muling."
- Missing episodes.
- Radicalisation
- Group based conflicts such as those involving "urban street gangs"
- Discrimination-based harms such as homophobia, transphobia, racism and sexism.
- Trafficking
- "Bullying"

h. Bullying

While bullying between young people is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a young person's well-being and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be treated as any other safeguarding concern.

If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective the DSL will consider making a referral to Children's or Adults services or the Police if it is deemed an offence has been committed.

Below is an image to help better understand the environments, or 'contexts' in which young people traverse, and therefore where potential risks, including harmful social norms may exist. Clearly, YMCA staff, due to the very nature of the work they undertake, and the relationships they are able to foster, places them at the forefront of being able to contextually safeguard children and young people.

i. Contextual Safeguarding

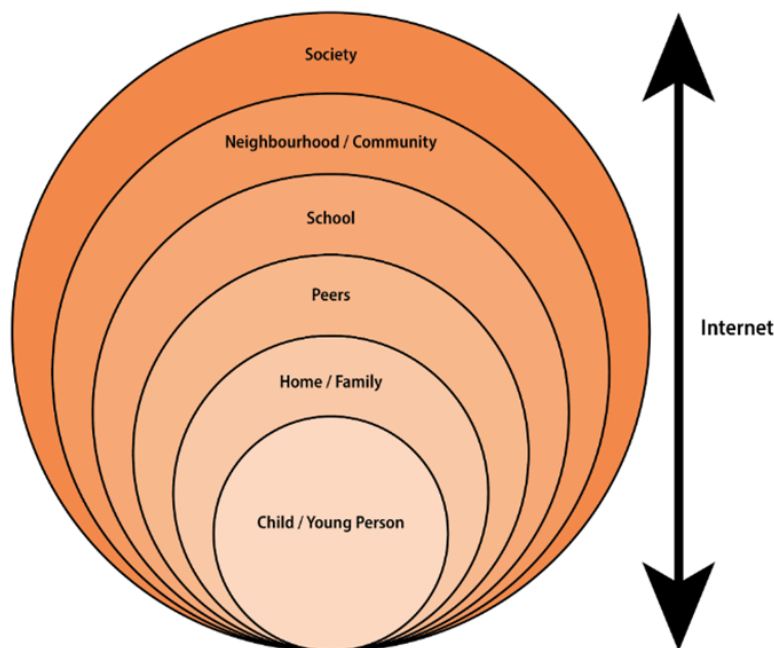


Image Source: SaferNow Training and Consultancy

Given the nature of YMCA MK & N's work activities, contextual information may be more readily available than to other services, as such, it is imperative that staff pass on such concerning information relating to place and space, (including online spaces,) trends and behaviours, risky adults, harmful social norms and exploitation risks. Such information or intelligence should be captured, recorded and passed onto relevant authorities whenever that is in the best interests of children, young people, and the local community or indeed is required by law. Given the nature of such information, careful consideration and defensible decision-making should be paramount here. Staff are to pass on any such information to their DSL for decision-making.

It is worth noting that YMCA staff, whilst potentially best placed to obtain such information, do need to consider the rights of those whose confidence they may be breaching by passing on such information, and should not be conducting their own investigations to deliberately obtain such information, especially if that increases risks posed to young people or staff. There is a difference between safeguarding and surveillance, a line that must be considered at all times.

Information pertaining to identifiable evidence or intelligence should be passed on to trusted contacts within the appropriate authorities, whether Community Safety, Children's or Adult's Social Services, or Police. Such relationships between YMCA MK & N staff and agency leads should be fostered to ensure transparency of actions and support towards young people and their lives.

All information that does not include identifiable features regarding young people, pertaining to contextual information or intelligence, should be passed to the Police via an intelligence form, as well as highlighted to any relevant professionals or agencies.

It is very important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the young person is at risk. **Remember you may be that missing piece of the 'jigsaw'.**

8. CONCERN, DISCLOSURE, ALLEGATIONS AND COMPLAINTS

a. Concern about a Child or Young Person

A concern is when there is reasonable cause to suggest that a child or young person is experiencing some form of abuse or may be at risk of harm or neglect.

Any child or young person in any setting could become a victim of abuse. Staff should always maintain an attitude of, "It could happen here".

In the case of a concern, do not start your own investigation, and share information on a strictly need-to-know basis i.e. do not discuss the issue with colleagues, friends or family etc.

Please report the concern following the reporting procedure outlined below.

b. Disclosure

A disclosure is when another child/young person tells someone else about the behaviour of another person(s) which makes that individual feel that they have experienced some form of abuse and may be at risk of harm.

If a young person discloses to a member of staff or volunteer

It takes a lot of courage for a child to disclose that they are being abused. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a young person talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the young person know that they must pass the information on** – staff are not

allowed to keep secrets. The point at which they tell the young person this is a matter for professional judgement. If they jump in immediately the young person may think that they do not want to listen but if left until the very end of the conversation, the young person may feel that they have been misled into revealing more than they would have otherwise.

When a disclosure is made it is important to remember to take what you are being told seriously, stay calm and reassure, do not investigate (i.e. listen rather than asking questions, because questions could be leading), do not delay and seek advice from the DSL if you are unsure. Make a careful record of anything you are told or observe including date and sign. Record this on MyConcern immediately, or no later than the end of your shift.

During their conversations with young people, staff will:

- allow them to speak freely;
- remain calm and not overreact – the young person may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me';
- not be afraid of silence – staff must remember how hard this must be for the young person;
- accept what is being said without passing judgment;
- be mindful of body language, as this may stop free recall if demonstrating shock or disgust
- when receiving a disclosure, it is important not to steer the conversation by asking leading questions that might influence the young person's responses. Instead, the staff member should let the young person express themselves freely without adding their own ideas or words into the discussion. Staff members can ask simple and clarifying questions to better understand the details provided by the young person;
- at an appropriate time tell the young person that in order to help them, the member of staff must pass the information on;
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child or young person who has been abused;
- avoid admonishing the child or young person for not disclosing earlier. This may be interpreted by the child or young person to mean that they have done something wrong;
- tell the young person what will happen next;
- let them know that someone (either you or another named person, e.g., the DSL) will contact them as soon as possible;
- follow the reporting procedure outlined below.

c. Reporting Procedure

Our reporting procedure for all concerns and/or disclosures is as follows:

- In an emergency take the action necessary to help the child or young person - for example, call 999;
- report your concern to the relevant Designated Safeguarding Lead (DSL) verbally, and complete a factual record on MyConcern – immediately wherever possible and no later than the end of your shift*;
- follow the DSL's direction via completing MyConcern actions in the time frame expressed;
- seek support for yourself where necessary;
- confirm actions are in line with the flow chart **Timeline** on page 20 of this document.

**In rare instances where you cannot report to the DSL for any reason, please pass the concern on to a manager on the incoming shift outlining why you have been unable to contact the relevant DSL.*

Any safeguarding referrals must be logged both internally on the inhouse system MyConcern and with the relevant Local Authority. The referrer must upload proof of any referrals or submissions made onto MyConcern using the 'Upload Documents' function and use the same function to upload any email exchange or outcome letters pertinent to the referral made. This is so we can provide an accurate record of actions taken and decisions made should the referral in question proceed to court.

The referrer has the responsibility to follow up on the outcome of all referrals made if they do not get a written response. The DSL should ensure the referrer follows up wherever necessary.

Under 18's

If it is someone under the age of 18 who the concerns relate to, the DSL will ensure a referral is made to the Multi-Agency Safeguarding Team if it is believed that a young person is suffering or is at risk of suffering significant harm.

If the child or young person is under 18, the parents/carers will be told that a referral is being made, unless to do so would increase the risk to the child or create undue delay.

A key point to consider for anyone concerned about a child's welfare is within '**Keeping Young People Safe in Education 2018**', which emphasises that 'any member of staff may make a direct referral to young people's Social Care' (Multi-Agency Safeguarding Hub) if they genuinely believe independent action is necessary.

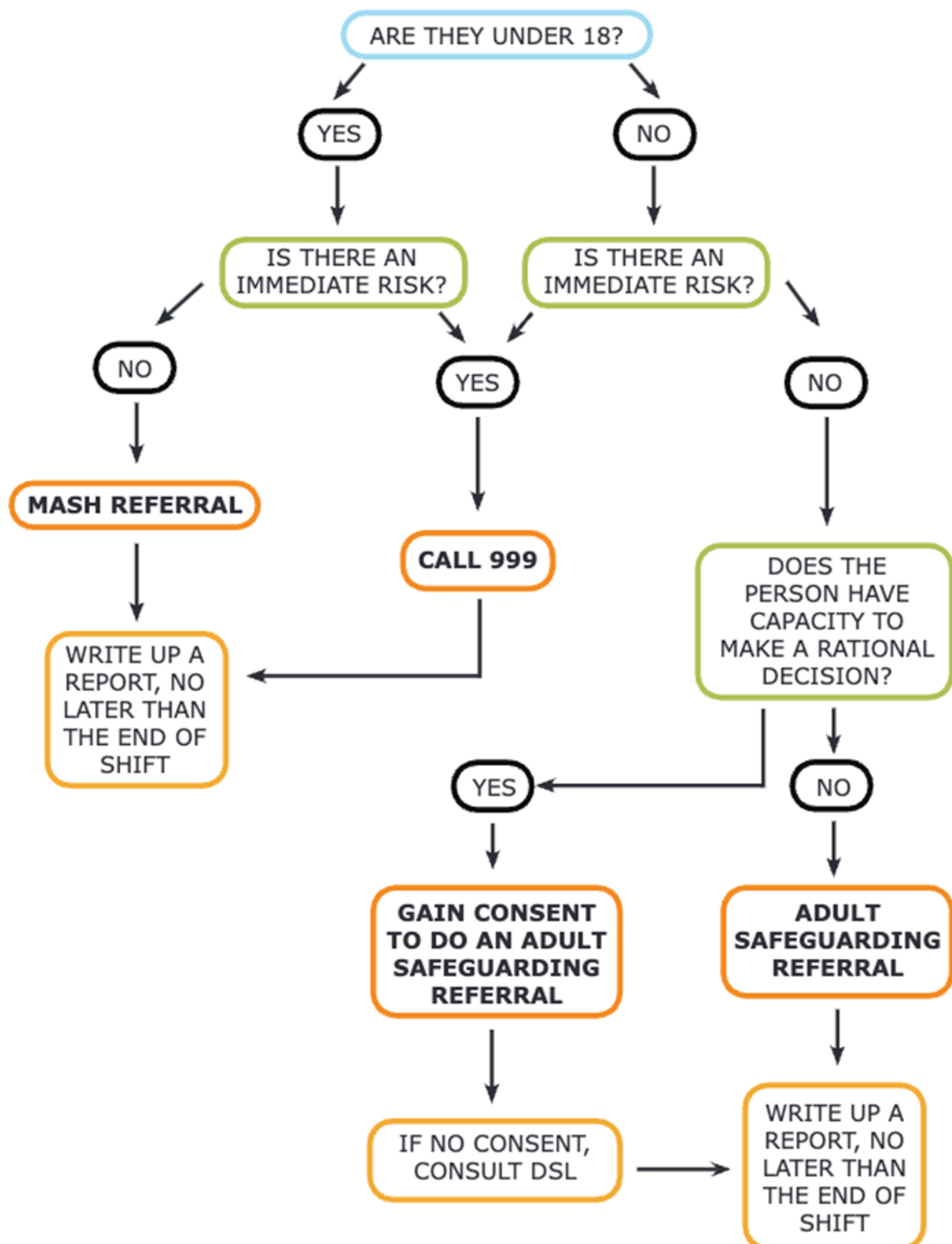
Over 18's

If over the age of 18, the young person is to be consulted unless unsafe to do so, and Adult Social Services contacted.

Monitoring

Safeguarding incidents are monitored by the DSL for each work area and reported monthly to the Senior Leadership Team. The Director of Youth & Community will report relevant information to the Board of Trustees at every meeting. Any significant Safeguarding incident is to be brought to the attention of the Senior Leadership Team immediately.

YMCA Milton Keynes Safeguarding Procedure



d. Defensible Decision Making

Defensible decision-making is defined by Kemshall (2009) and Cooper (2011) respectively as:

- 'Decisions that will withstand the harsh scrutiny of hindsight bias in the event of a risk failure ...informed, balanced, proportionate and just risk decisions'.
- 'Critical, reflexive and careful judgements...with the fully considered evidence of incomplete knowledge so that you can defend and justify your assessments, plans and interventions'.

When presented with any information pertaining to a safeguarding concern, due process must be followed as ascribed in this policy. That being said, all decisions of risk regarding nature need to be, in good practice, defensible. Not only is this a creative process of problem-solving, but this is also a case recording process.

In circumstances where nuance is required, defensible decision-making is a must. For example, a staff member may well receive information regarding a young person that, if passed on to relevant authorities, may increase contextual risks posed to that young person. Such decisions within complex circumstances must always be made by DSL and, if significant risk is involved, risk that cannot be reduced or mitigated, the Deputy CEO or CEO should be consulted due to any potential reputational risk posed to YMCA MK & N, as reputational risk is always a possibility in such matters. They will escalate to the Board of Trustees as and where appropriate.

e. Allegations

An allegation may be made against a member of staff or trustee. An allegation is when someone in the group or organisation is informed that there is reasonable cause to believe that a person who works with children or young people may have harmed a child or young person, committed a criminal offence against a child or young person, or has behaved in such a way that indicates they pose a risk of harm to such individuals.

When an allegation is made, set procedures must be followed. It is rare for a young person to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. We must, however, be aware that some people working with children and young people do pose a serious risk to them and we must respond appropriately to every allegation.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

Our policies and procedures are in line with the statutory guidance, the relevant Regulatory Authority guidelines, our disciplinary, complaints and grievance procedures and are available to everyone. Where a complaint or allegation has been made with regards to any inappropriate behaviour or poor practice relating to safeguarding, the DSL will, in all cases, discuss the situation with the relevant Local Authority Designated Officer and / or the Police before making a joint decision about the best way forward. In the case where the DSL is implicated, their line manager should be informed. In the exceptional circumstances that both are involved, the person concerned will inform the relevant member of the Senior Leadership Team. If there is a belief that the concern has not been taken seriously or acted upon, then anyone can "whistle blow".

With regards to disciplinary and grievance procedures, we will take no steps until we have fully discussed and agreed a strategy with the relevant authorities. Any investigation will override the need to implement any such procedures. Our management are responsible for making referrals to the relevant criminal records service, Regulatory Authority or professional body

If an individual has breached duty of care and/or organisational policy; referral to Charity Commission if it is deemed that a serious incident has occurred.

All allegations against staff should also be reported to the Senior Leadership Team. Allegations against the Senior Leadership team should be reported to the Chief Executive Officer. Allegations against the Chief Executive Officer should be reported to the chair of trustees.

Staff may also report their concerns directly to the police or social care if they believe direct reporting is necessary to secure action.

Staff, parents and trustees are reminded that publication of material that may lead to the identification of a member of staff, who is the subject of an allegation, is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Allegations concerning staff who no longer work here, or historical allegations will be reported to the Police.

f. Complaint about the Organisation

A safeguarding complaint about practice in the group/organisation which means that children or young people are put at risk.

g. Complaints Procedure

Our complaints procedure will be followed when a young person or parent raises a concern about poor practice towards an individual that initially does not reach the threshold for safeguarding action. Poor practice examples include unfairly singling out a young person or attempting to humiliate them, bullying or belittling a young person or

discriminating against them in some way. Complaints against staff are managed by the relevant member of the Senior Leadership Team.

Complaints from staff are dealt with under our complaints and disciplinary and grievance procedures.

Complaints which escalate into a child protection concern will automatically be managed under our child protection procedures.

9. WHISTLE BLOWING IF STAFF HAVE CONCERNS ABOUT A COLLEAGUE

Staff who are concerned about the conduct of a colleague - including visiting professionals and volunteers - towards a young person are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation, and they will wonder whether a report could jeopardise a colleague's career. All staff must remember, however, that the welfare of the young person is paramount.

Our whistleblowing policy enables staff to raise concerns or allegations, initially in confidence, and for a sensitive enquiry to take place.

Staff are expected to report all concerns about poor practice or possible abuse by colleagues - including what may seem minor contraventions of Staff Code of Conduct policy - first to their line manager, or if needed, the Senior Leadership Team; to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protect young people and reduce the risk of serious abuse.

Concerns or complaints about the Senior Leadership Team should be reported to the Chief Executive officer, and concerns of complaints about the Chief Executive Officer should be reported to the chair of trustees. Staff may also report concerns about suspected abuse or neglect directly to the Police if they believe direct reporting is necessary to secure action.

10. HOLDING MEDICATION

YMCA MK & N does not hold or administer medication for young people under any circumstances. In the rare instance that a young person asks us to hold medication i.e. in the incidence of a planned suicide attempt, a DSL may advise a staff member to take possession of medication which will be disposed of via a local pharmacy within 3 working days. For clarity, YMCA MK & N staff members must not administer and/or return medication to a young person under any circumstances.

11. STAFF TRAINING

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff and volunteers will receive detailed training during their induction which will include:

- Our child protection and safeguarding policy
- Signs and symptoms of abuse and neglect
- Responding to disclosure of abuse or neglect by a child
- Extra-familial harms training
- Reporting and recording arrangements
- Staff Code of Conduct policy
- Details of the DSL

N.B. all of the above will be explained **before** a new member of staff or volunteer has direct contact with young people. Our Safeguarding Policy and Professional Boundaries policy will be shared via PeopleLog and each individual will sign to confirm that they have read and understood both policies and undertake to comply with them before they begin any direct work with young people. The individual will be given an opportunity to clarify any issues during their induction.

All staff, volunteers, and trustees will receive appropriate and regularly updated safeguarding and child protection training and thematic updates as required (at least annually), and partake in regular discussions at staff meetings. This will enable staff to be equipped with the requisite skills and knowledge to safeguard young people effectively in line with statutory guidance and any requirements of YMCA MK & N.

The DSLs/DDSLs will attend training for newly appointed DSL/DDSLs and refresher training every two years. That training will include up-to-date information about inter-agency procedures. In addition, the DSL/DDSL will update their knowledge and skills at least annually to keep up with any developments relevant to their role and will be supported to access inter-agency training as part of their continuing professional development.

All staff will be made aware of the increased risk of abuse to certain groups, including young people with special educational needs and disabilities, looked after young people, young carers and risks associated with specific safeguarding issues including child sexual/criminal exploitation, extremism, County Lines, female genital mutilation and forced marriage.

In addition, the Senior Leadership Team and at least one trustee will attend safer recruitment training. YMCA MK will maintain a log of training for all.

12. SAFER RECRUITMENT

Safer Recruitment is a process to ensure that everyone who works or volunteers with children is safe to do so.

We endeavour to ensure that we do our utmost to employ 'safe' staff and allow 'safe' volunteers to work with young people by following the guidance in ***Keeping young people Safe in Education 2023 (p52)***, **Safer Recruitment Consortium**

(<https://www.saferrecruitmentconsortium.org/>)

- Interviews, references and checks on gaps in work history
- Check right to work in UK if from overseas
- Criminal records checks where required – use of DBS eligibility checker*
- All trustees will be subject to standard checks as defined in **Keeping Young People Safe in Education 2023**.
- Volunteers will undergo checks commensurate with their work and contact with young people. Under no circumstance will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in regulated activity.
- The identity of all contractors on site is checked, and DBS checks requested where appropriate. Contractors who have not undergone checks will not be allowed to work unsupervised or in any regulated activity.

13. RECORD KEEPING

We will maintain safeguarding records in accordance with our guidance.

We will:

- keep clear detailed written records of concerns about young people (noting the date, time, event and action taken), even where there is no need to refer the matter to young people's Social Care immediately; this is in line with The Management Framework for Retention and Transfer (2019) which states that record and reports on safeguarding incidents and allegations relating to children and vulnerable adults must be retained for six years.
- store records securely using our cloud-based database, InForm and/or MyConcern, which is password protected.
- ensure records will only be accessible to the DSL and staff who need to be aware.
- Case notes and other recorded information regarding young people will be in a format that is *written to that young person*.

Such records will include, in addition to the name, address and age of the young person, timed and dated observations describing the young person's behaviour, appearance, statements/remarks made to staff or

other young people and observations of interactions between the young person, other young people, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, exact words spoken by the young person or parent/carer will be recorded. Records will be signed, dated and timed by the member of staff making the record.

Remember GDPR and Data Protection Act (2018) Data Protection Act are not barriers to justified information sharing.

14. PHOTOGRAPHY AND IMAGES

The vast majority of people who take or view photographs or videos of young people do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse young people by taking or using images, so we must ensure that we have some safeguards in place.

To protect young people, we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications);
- seek parental consent if under 18;
- If names are required, only use first names.
- ensure young persons are appropriately dressed; and
- encourage young people to tell us if they are worried about any photographs that are taken of them.

15. ONLINE SAFETY

Young people commonly use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share and receive content and images via social networking sites. The ever-changing landscape of the online space creates ongoing challenges for young people and those who aim to safeguard against online harms. As such, YMCA MK & N staff should regularly review their understanding of such spaces through training.

Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm young people. That harm might range from sending hurtful or abusive texts and emails to grooming young people to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Young people may also be distressed or harmed by accessing inappropriate websites that promote harmful views, extremist behaviour and criminal activity.

The majority of young people own or have access to handheld devices and parents are encouraged to consider measures to keep their young people safe when using the internet and social media at home and in the community.

Cyberbullying and sexting by young persons will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

a. Online/electronic communication between staff and young persons

Staff also receive advice regarding personal online activity, use of social networking and electronic communication with young people, about which there are strict rules. Staff found to be in breach of these rules may be subject to disciplinary action.

Safe practice comprises of:

- Caution with whom professionals accept as friends on work based social media only
- Copying in another adult into the communication e.g., parent or another staff member
- Using appropriate language
- Avoiding jargon/abbreviations which could be mis interpreted e.g., LOL, not putting a 'X' at end of communication
- Communicating at appropriate times of the day i.e., not late at night or early morning and never during school time. If required workers must use school reception.

END