Title of Policy:	**Safeguarding**
Section:	**Operations**

Purpose

The purpose of this policy is to provide all employees and anyone who uses our service with an understanding of the importance we place on the safeguarding of young people whom we support and the actions we will take in response to any reports of concerns.

All staff have a responsibility to ensure that they have read and signed the safeguarding policy.

Statement

Legislation, Guidance, Reference

This Safeguarding policy and procedures have been developed with reference (but not restricted) to the following:

- The Children Act (1989; 2004)
- The Supported Accommodation (England) Regulations 2023
- Guide to the supported accommodation regulations including quality standards March 2023
- Working Together to Safeguard Children 2023
- Care Standards Act 2000
- Human Rights Act 1998

Active 8 Support Services understands and fully accepts its responsibility towards protecting the safety and wellbeing of young people in our supported accommodation. All young people have a right to experience a childhood free from abuse, neglect, or exploitation.

The safeguarding of young people is everyone's responsibility, and we have a policy of zero tolerance towards abuse, maltreatment, or neglect of any kind. Anyone

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation, or emotional abuse.

Child trafficking and modern slavery

Child trafficking and modern slavery are child abuse. Children are recruited, moved, or transported and then exploited, forced to work, or sold.

Children are trafficked for:

- child sexual exploitation
- benefit fraud
- forced marriage
- domestic servitude such as cleaning, childcare, cooking, etc.
- forced labour in factories or agriculture
- criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft

Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another. It is highly likely that any young people that we support have experienced trafficking of some description as part of their journey to the UK and may remain at risk of modern slavery gangs on arrival.

Child sexual exploitation

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money, or affection as a result of performing sexual activities or others performing sexual activities on them. It can occur in person or online.

Gang related activity including 'County Lines' and criminal exploitation

County Lines is where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by young people or vulnerable adults who are groomed and coerced into doing so by gangs. The 'County Line' is the mobile phone line used to take the orders of drugs. This may also be linked with 'cuckooing,' where gang members may effectively take control of a flat or other living space to further their control of a young person.

Female genital mutilation

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision or cutting. There is a mandatory duty for staff to report this to the police for girls under the age of 18.

Harmful sexual behaviour

Harmful sexual behaviour includes:

- using sexually explicit words and phrases
- inappropriate touching
- using sexual violence or threats
- full penetrative sex with other children or adults

Self-neglect

This covers a wide range of behaviour which shows that someone is not caring for their own personal hygiene, health, or surroundings. It includes behaviour such as hoarding. This may be a symptom of mental health issues or be a symptom of other underlying safeguarding concerns.

Safeguarding concerns associated with emotional and mental health needs

This may include concerns around young people who may self-harm or express suicidal behaviour.

Radicalisation and extremism

Young people may also be at risk of radicalisation and extremism. This is dealt with in more detail in our Radicalisation and Extremism policy, but Active 8 Support Services recognises that risk associated with radical or extreme beliefs and/or behaviours are a serious safeguarding concern.

Extremist ideas oppose or defy our fundamental British Values; often disagreeing with democracy; UK law; and equality. Commonly, extremist ideas include a distinct prejudice towards a particular race and/or religion. This can include supporting a call for death or harm to be carried out on particular groups.

There may or may not be direct contact with the person who perpetrates radicalisation. The internet is a major tool used to promote extremist ideas and to contact vulnerable young people.

Risk factors

All young people that we support at Active 8 may be more vulnerable to a range of forms of abuse, grooming and exploitation due to their status of being unaccompanied asylum-seeking children. They may have already experienced abuse during their journey, are unlikely to have pre-existing protective and supportive networks on arrival and may have limited English language to communicate their experiences. Some may have been trafficked with the intent of being abused via modern slavery and be at risk of abduction. Presented with an alien culture, they may not have the skills to recognise risks presented to them by potential groomers and abusers.

Preventative Measures

Active 8 Support Services have a range of practices to reflect an organisational culture to reduce safeguarding risks to young people, including the following measures:

The measures taken as part of our prevention culture include:

- Implementing robust safer recruitment practices
- Carrying out a clear induction process in which safeguarding responsibilities, policies and procedures are clearly explained to all staff and training is undertaken
- Ensuring that safeguarding, whistleblowing, and other related training is updated regularly to ensure that staff can recognise any signs or symptoms of abuse, understand, and follow the procedures if concerns arise
- Ensuring that adequate staffing levels are in place, with procedures in place to deal rapidly and appropriately with any shortages
- Ensuring that staff receive regular supervision to monitor staff welfare and resilience, safe working practices and identify any additional training and personal support needs
- Ensuring any staff who leave the organisation have a thorough exit interview, giving them the opportunity to highlight any factors which may impact upon safeguarding
- Developing a culture of professional curiosity
- Creating robust risk assessments from the point of referral that capture young people's known past and current vulnerabilities, are kept under regular review and amended in response to changing or emerging safeguarding concerns

- Having clear reporting and recording procedures in place to ensure a prompt response to any safeguarding concerns
- Helping young people to keep themselves safe through advice and guidance and via drop-in sessions on subjects like keeping themselves safe online
- Ensuring use of CCTV in communal areas of shared buildings is used only as a security measure in compliance with the policy in place
- Ensuring that properties where young people live are safe and secure, and that any known risks in the local area are assessed and mitigated against
- Ensuring that staff understand and maintain professional boundaries with young people
- Ensuring that staff and young people understand the complaints procedure
- Ensuring that independent interpreters are available

Steps to be taken in response to disclosures, allegations, and concerns regarding abuse

Safeguarding concerns about young people supported by Active 8 may arise or from a range of sources:

- From contact with people that they know in the community
- From contact with professionals involved in their support and education
- From contact with other young people with whom they live

Concerns can arise either through a direct disclosure by the young person or through an allegation/disclosure or observation by a third party.

All employees have a duty to report concerns or reported abuse of any kind and will be fully supported when doing so. Any concerns of abuse should be immediately reported to a manager. The Registered Service Manager/Designated Safeguarding Officer and Nominated Individual must be notified if the concern is raised with another manager.

Staff should not:

- directly challenge the person accused of abuse
- promise to keep abuse a secret
- pass comment or opinion when a person discloses an allegation of abuse
- undertake their own investigation, which could harm evidence or alert the abuser

If a member of staff resigns during the process, the investigation will be continued to its conclusion.

In some cases, and following disclosure and barring service guidelines, a referral will be required following any disciplinary action taken.

Active 8 Support Services' insurer will be informed about the investigation at an early stage.

In cases where the police are involved, they may wish to conduct a criminal investigation and require a provider not to pursue internal investigations which may hamper the evidence. Active 8 Support Services will always follow the police advice.

Record keeping

A record must be made of any disclosure or evidence, providing as much details as possible on the safeguarding form. A direct disclosure should be recorded using the wording used by the young person, without 'sanitisation' or interpretation. Where an interpreter is required, it will be made clear that the record must be recorded in the young person's words.

Active 8 Support Services will ensure that all allegations and safeguarding incidents are recorded both in-house and on the personal file of the young person. This will include all actions taken in response to the allegation or disclosure, any investigations undertaken and outcomes.

All details relating to safeguarding will be retained in line with data protection legislation and stored securely.

Active 8 Support Services will follow the guidance of "Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers"

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf

A lesson-learned process will always be conducted to continually improve the actions of the service that we provide.

The young person's risk assessment will be updated in response to the emerging concerns.

Keeping the young person informed

Active 8 Support Services will keep the young person informed of what is happening throughout any investigation and support them to understand the actions being taken. The young person will be informed of the outcome of investigations and the complaints procedure should they be unhappy with the outcome.

Supporting young people in response to disclosure or allegations

Young people will always be offered reassurance following making a disclosure or allegation. It is important for them to understand that they will not be in any trouble for sharing their concerns. If concerns are raised by a third party, this will be explained to the young person where additional safeguards may need to be put in place.

Active 8 staff will offer non-judgemental support throughout any processes or investigations to the young person in a way that does not undermine the integrity of the process. They will also refer the young person to external services of support as appropriate.

Dealing with allegations of peer abuse

If two young people make conflicting safeguarding allegations against one another, or if information is received from a third-party regarding abuse, this will be taken seriously. Dependent on circumstances, this may be dealt with in line with bullying procedures or exploitation procedures.

A risk assessment will take place to determine whether, as a last resort, young people need to be separated if they live in the same property. If potential conflict between the two young people could also adversely affect the safeguarding of other young people living there, this should also be risk assessed and acted upon accordingly.

If young people have made conflicting allegations, they should be investigated equally. Young people will be informed of the outcome of any investigation.

Disclosures of historical abuse

Most young people that we support have recently arrived in the UK, although some will have lived in other foster care placements or residential settings. Therefore, for most it is likely that little will be known of their history prior to their arrival. It is only as they being to develop trusting relationships with their case worker, that young people may feel safe enough to make disclosures of abuse that they have experienced previously or during or after their journey to the UK. Any historical disclosures will be reported to children's

social care and/or police according to procedures, and Active 8 staff will comply with any resulting actions including attending strategy discussions and meetings.

Issues regarding trafficking risks are considered on arrival, however, Active 8 will further assess any immediate risk to the young person making a disclosure of historical abuse to consider any further actions.

Whistleblowing

Where the concern or allegation has come from a member of staff, the whistleblowing procedures apply in respect of the concern being raised in accordance with the whistleblowing policy.

Staff Training

All staff receive training in safeguarding and related areas. This is completed during their induction and refreshed at regular intervals to ensure that their knowledge remains up to date. Safeguarding training is delivered online through iHasco. Designated Safeguarding Lead training can also be provided to Staff to broaden their knowledge of safeguarding. Staff are also expected to read relevant policies. IHasco training expires every two years and progress on training is reviewed in every staff supervision every 6-8 weeks. Staff must prioritise completing and refreshing their training when this is required and Active8 always promote and encourage training.

Safeguarding issues are also discussed in supervision and at weekly team meetings.

The referral and placing process

Active 8 has a comprehensive referral process in place. During this process, we will gather as much information about the young person as possible, including any known needs and vulnerabilities, considering that they may not be known to the accommodating authority if they have very recently arrived in the UK.

An initial risk assessment is completed to determine whether the service is suitable to meet the young person's needs prior to the offer of a placement. This will consider the young person's individual needs, including their cultural background and language so that we can provide the most appropriate accommodation.

Dynamic risk assessment

All young people are assessed in response to their individual vulnerabilities. The initial risk assessment is reviewed following the initial 14-day period of assessment (unless

additional concerns arise during that period). They are then updated in response to any changes or emerging safeguarding concerns.

Locality risk assessments are completed for each property to help ensure that all registered properties that accommodate our young people are safe and that we have assessed and reviewed the area including, crime statistics, drug issues, terrorism concerns etc to prevent our young people from facing safeguarding concerns.

People without capacity:

People must be assumed to have capacity to make their own decisions and be given all practicable help to do so before anyone treats them as not being able to make their own decisions. Where a young person is found to lack capacity to decide then any action taken, or any decision made for them, or on their behalf, must be made in their best interests.

An assessment would need to be made for any young person in crisis to determine what support would need to be sourced, i.e. contacting emergency services.

Out of hours issues:

Our on-call service operates between the hours of 5pm-9am. This consists of being responsible for a duty phone, answering and responding to all calls received to this number. All staff are encouraged to give this number to their Young People and should not answer calls after 5pm. This service needs to be utilized.

The competent member of staff operating on duty will be responsible for dealing with the safeguarding concern appropriately and following the Safeguarding procedure.

Managers will be available to answer any calls/queries you have whilst operating on call. Please do not feel that you cannot ring for advice and support as we would rather you seek guidance and assistance if you're unsure than responding to a call out when it may not be necessary.

Initial training and guidance can be provided, further training in safeguarding and Appropriate Adult training can be sourced if you are willing and resilient enough to operate as an on-call worker. The managers available 24hours for support are:

Laura Winstanley – 07885896147
Idris Ali – 07515796661

All safeguarding incidents must be reported straight away to your line manager, a safeguarding form completed, and the details of the incident fully recorded onto people planner. It is also vital to inform EDT with the EDT numbers that are provided to all staff. It is important to be apart of the discussions with management as to whether the incident meets the threshold for OFSTED to be notified and whether a reg 27 is needed to be submitted with 24 hours. All on call staff are familiar with the process of reporting notifiable offences to OFSTED within timescales.

Please see below for reporting notifiable offences to OFSTED:

As a registered provider you are required to notify Ofsted of all serious events that occur from the date of your registration certificate, see Regulation 27. These notifications should be submitted to Ofsted through the following link:

https://www.gov.uk/guidance/tell-ofsted-about-an-incident-childrens-social-care-notification

OFSTED Standard(s) directly linked to this Policy	**The leadership and management standard** **The protection standard** **The support standard**
Regulation(s) relevant to this Policy	**20: Safeguarding policy** **27: Notification of a serious event**

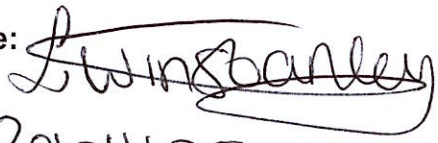
Policy Reviewed on Date of Implementation by the Following Company Officer:

Full name:

Laura Winstanley

Job Title:

General Manager

Signature: 

Date: 30/04/25

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| Telephone: 01517031860 | Email: admin@active8supportservices.co.uk |
| On-Call: 01517031860 |

Local Safeguarding Team Contact Information

Name of Local Authority	Office Address, Phone Number and Email Address of Children's Safeguarding Team
Liverpool	*Office Address:* *Cunard Building* *Water Street* *Liverpool* *L3 1JR* *LADO & Risk Manager: Catherine Ballans* *Tel: 0771 6702034* *LADO: Pauline Trubshaw* *Tel: 0784 1727309* *Email: lado@liverpool.gov.uk* lado_referral_form_january_2022_.docx (live.com)
Knowsley	*Office Address:* *2nd Floor,* *Nutgrove Villa,* *Westmorland Road,* *Huyton,* *L36 6GA* *LADO: Diane Kitcher* *Email: diane.kitcher@knowsley.gov.uk* Notification, Recording (knowsleyscp.org.uk)

Company Designated Safeguarding Officer (DSO)

Name of Safeguarding Lead	Job Title of Safeguarding Lead	Office Address, Phone Number and Email Address of Safeguarding Lead
Anna Geggie		*Office Address:*

	Registered Service Manager	*125-127 High Street, Wavertree, Liverpool, L15 8JS* *Phone Number: 0151 703 1860* *Email Address: anna@active8supportservices.co.uk*
Laura Winstanley	*Nominated Individual*	**Office address: 125-127 High Street, Wavertree, Liverpool, L15 8JS** **Phone number: 0151 703 1860 07885896147** **Email address: laura.winstanley@active8supportservices.co.uk**
Laura Crockett	*Senior Coordinator*	**Office address: 125-127 High Street, Wavertree, Liverpool, L15 8JS** **Phone number: 0151 703 1860** **Email address: laura.crockett@active8supportservices.co.uk**