



*Making the difference*

# Child Protection & Safeguarding Policy



## CHILD PROTECTION & SAFEGUARDING POLICY

### GUIDING PRINCIPLES

Vranch House employs qualified and dedicated people to deliver educational and clinical services to disabled children in locations throughout Devon but principally at Vranch House in Exeter and at the Barnstaple Families Health Centre in North Devon.

The care, protection and correct treatment of children whilst in the charge of Vranch House personnel, whether employees or volunteers, is the first concern of the Trustees of the charity and of the employed members of the Management Team (The Chief Executive, Head of Education and Head of Therapies). No policy for the protection of a child's rights can cover every eventuality but the following broad principles are the foundation of good practice:

- Children, like adults, have inalienable rights under the Human Rights Act of 1998. As children are, by definition, less able to protect themselves than adults they deserve to be treated with greater sensitivity particularly in any and all matters relating to their rights as individual Human Beings. These include the rights to privacy, dignity, respect and freedom from any form of physical, psychological or emotional abuse.
- **All staff employed by Vranch House School must use the online 'Child Protection Online Management System' (CPOMS) as the primary recording method for all Safeguarding and Child Protection concerns.**
- Disabled children are even less able to protect themselves than able-bodied children and this is particularly true when the disability includes either or any combination of physical disability, inability to communicate or learning difficulty. Adults employed or engaged by the Charity to work with such children are placed in a unique and privileged position of trust *and it is their constant duty to ensure that the children in their charge are free from abuse of any kind and from any source.*
- All employees and volunteers are charged with the constant duty of reporting any evidence or suspicion of abuse to the relevant Head of Department via CPOMS (the Head of Education in the case of school children and the designated clinical safeguarding lead in the case of outpatients).
- **Safeguarding of pupils' wellbeing is not isolated to being alert to signs of abuse. Any indication or observation that cause concern around a child's physical, emotional or mental wellbeing are to be recorded on CPOMS.**
- Any member of staff or volunteer who wishes to raise any matter bearing on safeguarding the wellbeing of a child or young person referred to the charity, at any time, must do so by reporting such matters via CPOMS in the immediate and to the designated clinical safeguarding lead in the case of outpatients. If the situation remains unchanged then the member of staff or volunteer should ask for the matter to be re-considered.
- In addition, if at any point, there is a risk of immediate serious harm to a child, a referral should be made to the Multi-Agency Support Hub (MASH). Anybody can make a referral, though Parents/Carers must be informed unless doing so would further endanger the child(ren) in question.
- If a member of staff has concerns about another staff member, then this should be logged on CPOMS and referred, in person, to the Head of Education. If there are concerns about the Head of Education then this should be referred to the Chair of Trustees or Chief Executive of the Charity.
- The procedures detailed in [www.devonsafeguarding.org](http://www.devonsafeguarding.org) are to be followed in the event of a reported or suspected incident of child abuse. The MASH flow chart "*What to do if you are worried that a child is being abused*", is on display in all classrooms and the staffroom.



- All new staff will be expected to complete Level 1 'Introduction to Safeguarding' before commencing their employment. In addition to this, **all staff** must attend the annual 'Safeguarding & Child Protection Refresher' Level 3 INSET training.

We perform the following **safeguarding checks** on each level of staff directly involved with any operations involving children and young people at Vbranch House:

- All new teaching/therapist staff:
  - Three-route Identity check (as per Disclosure & Barring Service guidelines – 2018)
  - Enhanced DBS check
  - Barring list check
  - Prohibition from teaching check (teachers only)
  - Home Office (or other country equivalent) checks for all staff having worked overseas
  - Professional qualifications check
  - Right to work in the UK
- All staff with leadership and/or management responsibilities:
  - All of the above **plus** Section 128 list check
- Trustees and Governors:
  - Three-route Identity check (as per Disclosure & Barring Service guidelines – 2018)
  - Enhanced DBS check
  - Section 128 list check
  - Home Office (or other country equivalent) checks for all staff having worked overseas
  - Professional qualifications check
  - Right to work in the UK
- Volunteers:
  - Three-route Identity check (as per Disclosure & Barring Service guidelines – 2018)
  - Enhanced DBS check
  - Barring list check
  - Home Office (or other country equivalent) checks for all volunteers having worked overseas

### Senior Designated Person

The senior designated person is the Head of Education (Mrs Kayleigh Price) in the case of Vbranch House School pupils and the designated Clinical Lead for Safeguarding for outpatients (Mrs Kate Moss). They are each other's deputies.

### Children's Complaints

A school pupil would normally report any complaints to his or her class teacher, school nurse, teaching assistant or lunchtime assistant. Any Outpatient, or their Parent/Carer, can make a complaint directly to his or her therapist, the duty School Nurse or another member of the Therapy Team.

Any member of staff or volunteer might find that they are confided in by a child and it is their duty to bring that information to the attention of the Head of Education or, in the case of an outpatient, to the Clinical Safeguarding Lead.

### Types of Abuse and Neglect

Abuse is a form of maltreatment of a child and can be physical, emotional, sexual or neglect.



Specific safeguarding issues have been identified in *Keeping Children Safe In Education (KCSIE)2023* (Sept 2023, Department of Education). They are:

- child missing from education
- child missing from home or care
- child sexual exploitation
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender based violence/ violence against women and girls (VAWG)
- mental health
- private fostering
- preventing radicalisation
- sexting (texting sexually explicit text or images)
- teenage relationship abuse
- trafficking

Although some of these issues are unlikely to affect nursery and primary aged children with special needs directly, they all may have an effect within families (i.e., siblings and parents) which can lead to a child experiencing emotional abuse by being aware of abuse within the family. All staff need to be aware of these situations and how they can affect children.

In particular, with regard to Female Genital Mutilation, teachers and healthcare workers have a statutory duty to report concerns to the police if they discover that FGM appears to have been carried out on a girl under 18. This can be reported or observed (for example when changing children's nappies) but children must not be examined specifically for FGM.

### **Preventing Radicalism**

All schools are now to have "due regard to the need to prevent people from being drawn into terrorism" this is known as the Prevent duty (Counter-Terrorism and Security Act 2015). VrancheHouseSchool is committed to following the Prevent guidance, including these key four areas:

- Risk assessment of children and their parents/carers being drawn into terrorism.
- Ensure safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children's Board.
- Ensuring Prevent awareness training for staff, with annual update.
- Ensure internet access within school is safe from terrorist and extremist material.

### **Other Possible Signs of Abuse**

Staff employed or engaged as volunteers by the Charity should be aware of distress and unusual behaviour in children. This is particularly important in the case of children with communication difficulties. Any verbal comments or remarks made by a child which give cause for concern should be noted and reported immediately.

### Child-on-Child Abuse

Vranch House has a 'zero-tolerance' approach to child-on-child violence or other forms of child-on-child abuse. An environment of mutual respect between pupils and the adults supporting them is fostered across the school.

A caring and considerate attitude towards other pupils is promoted in the classroom and pupils are encouraged to tell staff if anything is worrying or upsetting them. Staff are trained to record any such disclosures and concerns raised on CPOMS under 'Child Contact' or 'Verbal & Aggressive Incidents'. All such Incidents will be reviewed by the Designated Safeguarding Lead and any appropriate action will be taken in accordance with the school's 'Positive Behaviour and Intervention Policy'.

Pupils are supervised at all times when using the internet and multimedia devices. Staff are aware of the necessary steps to take if inappropriate contact was made or cyber bullying was observed.

### E Safety at Vranch House School

The vast majority of pupils at Vranch House cannot independently access computers or other devices capable of establishing a connection to the internet. Those pupils who have their own devices or can make independent use of the internet have their online activity closely monitored by class-based staff.

Through our PSHE and RSE outcomes in the VIEW Curriculum, we aim to protect and educate our pupils in their use of technology in all its forms; be that the internet, mobile phones, television and even debit/credit technologies.

In line with KCSIE 2023, we will tackle the three main areas of risk presented by our pupils' use of technology in the following ways:

**Content:** our internet filters and server firewall are set, monitored and maintained on site, by our Engineering Project Manager, to eliminate as far as is practicable the risk of pupils being exposed to illegal, inappropriate or harmful materials.

**Contact:** the use of personal email accounts using Vranch House equipment is an infringement of our Data Governance Policy and may result in disciplinary action for staff or pupils engaged in this activity. No individual pupil is contactable via Vranch House email.

**Conduct:** we take care to raise awareness among our pupils *and staff* in the inherent dangers, as well as the positives, associated with sharing information, images and opinions on social media sites. Awareness of illegal online conduct such as 'sexting' and 'upskirting' are covered, at an appropriate level, within our VIEW Curriculum.

## SAFEGUARDING – SAFER RECRUITMENT PRACTICES

### First Employment



**The following are mandatory conditions not to be breached under any circumstances**

### **APPLICATIONS, INTERVIEWS & REFERENCES**

The **Job Description** must;

- Describe the main duties and responsibilities of the post.
- State the individual's responsibility for promoting and safeguarding the welfare of the children and young people for whom the applicant would be responsible or with whom the applicant will have regular professional contact.
- Include a person specification describing the qualifications, experience and other requirements needed to perform the role in relation to working with children and young people. It should also describe the qualities and competencies the candidate should be able to demonstrate and explain how these requirements will be tested and assessed at interview by using the following phrase:

"In addition to the candidate's ability to perform the duties of the post, the interview will also explore issues relating to safeguarding and promoting the welfare of children including:

- Motivation to work with children and young people.
- Ability to form and maintain appropriate relationships and personal boundaries with children and young people.
- Emotional resilience in working with challenging behaviours and attitudes to the use of authority and to the maintenance of discipline."

The **Application Form** approved by the Chief Executive annually is the only form to be used for all posts advertised by the Charity. This form is a legal document as it contains binding self-certification and will form part of the contract of employment of the successful applicant. The original (not a photocopy) is to be passed to the Chief Executive and kept in the successful applicant's Personnel File.

The **Interview Panel** must include at least one member who has successfully completed the Safer Recruitment Course (and is in-date). The issues to "be tested and assessed" as identified in the Job Description **must** be tested and assessed as part of the interview. The interview process should expose the candidate to the working environment of the advertised post and to the scrutiny of fellow employees, parents and children.

The successful candidate will be appointed subject to satisfactory references and DBS checks. In **requesting a Reference**, we must ensure that the current or last employer is one of the two referees we consult and we must ask both referees to comment on:

- The applicant's sickness record during the employment.
- Whether there have been any concerns about safeguarding issues in regard to the applicant or any disciplinary issues relating to children.
- Whether the employment record given by the applicant is accurate.

### **DBS CHECKS**

The **Single Central Register** is kept by the Chief Executive which will show against each employee's name:

- Confirmation that identity has been proven in accordance with Disclosure & Barring Service guidelines – 2018.
- The date of the Enhanced DBS check.





- The date of the Barring list check (as appropriate).
- The date of the Section 128 listcheck (as appropriate).
- Confirmation that all stated qualifications have been certified (originals to be inspected by the Chief Executive and photocopied for the personal file).
- Confirmation that the employment history has been checked through references.
- Confirmation that the health record has been checked (by certification on the application form and confirmation through the reference process).
- Confirmation that the applicant has the Right to Work in the United Kingdom (passport, registration, RTW documents listed at the end of this policy).

The 2006 Safeguarding Vulnerable Groups Act as amended by the 2012 Protection of Freedoms Act defines relevant employment activities as “Regulated” or “Controlled”. Vbranch House provides a regulated activity. The Management Team must note the following:

- It will be a criminal offence, punishable by up to five years in prison, for a barred individual to take part in a regulated activity for any length of time.
- It will be a criminal offence for an employer to take on an individual in regulated activity if they fail to check that person's status.
- It will be a criminal offence for an employer to allow a barred individual to work for any length of time in any regulated activity.
- The Protection of Freedoms Act of 2012 amalgamated the Criminal Records Bureau with the Independent Safeguarding Agency to become the Disclosure and Barring Service (DBS).

As a result of these points **all employees – and any volunteer or other person who could have unaccompanied access to a child at Vbranch House or in the community must have an Enhanced DBS clearance.**

## EMPLOYMENT PRACTICES

For the protection of children and staff the following practices are mandatory:

- Employees and volunteers (including students on placement) should not have on their person in the place of work mobile phones or cameras. Mobile phones, if brought to the premises, may be used in offices or the staff room but elsewhere **must be switched off.**
- Cameras may be used by clinical or school staff for clinical or educational purposes but the use of such equipment for this purpose must be explained to the parents or carers of the children concerned. **Images must be taken in the presence of another member of staff and images no longer required for the original purpose must be destroyed.**
- Use of the internet and mobile phones is governed by the “Electronics Communications Guidelines” (Policy number 14).
- Staff must be accompanied, or work in visual proximity of at least one other employee, when providing personal hygiene services to a child or young person.
- There will be many occasions in which a member of staff will be alone with a child at Vbranch House. In these circumstances, doors must be left OPEN (unless the room, like the Speech Therapy room, has clear glass windows on to the internal corridor).
- As part of Continuous Personal Development, Staff will be rotated and are obliged to attend the mandatory Safeguarding and Child Protection Training.
- Entry will be controlled by Reception and the inner powered door will not be left on automatic from the external side during school hours. All visitors must sign in and out.
- Recording video camera surveillance will be maintained.



- Any employed person or volunteer found to have breached the duty to safeguard the children and young people in our care, depending on the circumstances, must be reported to the Police, the LADO and/or the DBS.
- A copy of this policy will be provided to each employee when updated and is to be read and signed by each employee **every** year. Every school employee must also read Point 1 of "Keeping Children Safe in Education" (Department for Education Safeguarding Policy). By signing to say you have read this policy you are also stating you have read the latest version of "Keeping Children Safe in Education". The copies will be held centrally under the control of the Chief Executive.

## WHISTLEBLOWING AT VRANCH HOUSE

Whistleblowing has been defined as:

*'the disclosure by an employee or professional of confidential information which relates to some danger, fraud or other illegal or unethical conduct connected with the work place, be it of the employee or his/her fellow employees'*

(Public Concern at Work Guidelines 1997)

Statutory protection for employees who whistleblow is provided by **the Public Interest Disclosure Act 1998 ("PIDA")**. The PIDA protects employees against victimisation if they make a protected disclosure within the meaning of the PIDA and speak out about concerns about conduct or practice within the school which is potentially illegal, corrupt, improper, unsafe or unethical or which amounts to malpractice.

For further details, see the 'Whistleblowing Policy for employees and professionals working at Vranch House', which is annex (b) to this policy in all Essential Policies and Procedures folders at Vranch House. This additional sub-policy applies to all school staff including full and part time, casual, temporary or substitute staff and to individuals undertaking work experience in the school.

## OTHER RELEVANT POLICIES

### Encouraging Positive Behaviour at School

This school policy document details the school's approach to:

- Promoting Positive Behaviour
- Causes for Concern
- Early Intervention
- Sanctions
- Involving Outside Agencies
- Monitoring and Review
- Changes of Placement
- Bullying

The document is contained within the Vranch House School Curriculum Policies folder and on the school Hub under 'Curriculum Policies'

### Home School Communication Policy

The aim of this policy is to make communication between home and school simple, informative and relevant. This policy lists the ways in which we communicate with parents and carers including message books/diaries, newsletters and telephone calls.





The document is contained within the Vbranch House Curriculum Policies folder and on the school Hub under 'Curriculum Policies'.

### **Intimate Care Policy**

This policy gives full details of guidelines and good practice for intimate care.

The document is contained within the Essential Policies and Procedures folder.

### **Feeding Protocols**

This document gives full details of the procedure for ensuring vulnerable children are safely given food and drink.

The document is contained within the Essential Policies and Procedures folder.

### **Suction Policy**

This document gives a full description of procedures regarding suctioning.

The document is contained within the Essential Policies and Procedures folder.

### **Policy for Intermittent Catheterisation**

This document gives a full description of procedures regarding intermittent catheterisation.

The document is contained within the Essential Policies and Procedures folder.

### **Positioning Children in Supportive Equipment**

This document ensures the safe positioning of children to support their functional development. Unless for a safety reason and with prior parental agreement, straps are not to be used to restrain a child for behavioural purposes.

The document is contained within the Essential Policies and Procedures folder.

### **Moving and Handling Policy**

This policy includes details of moving and handling aims and procedures and states that children's dignity and their right to privacy is protected at all times.

The document is contained within the Essential Policies and Procedures folder.

### **References**

Keeping Children Safe in Education – Statutory Guidance for Schools and Colleges, Department for Education, September 2023

Working Together to Safeguard Children, Department for Education, July 2018

ID checking guidelines for standard/enhanced DBS check applications from 3 September 202 ([www.gov.uk](http://www.gov.uk))

What to do if you are worried a child is being abused: advice for practitioners, Department for Education, March 2015.

Counter-Terrorism and Security Act 2015.

The Prevent Duty, The Department of Education, June 2015.



## ADDENDUM 1

# RIGHT TO WORK DOCUMENTS – ADVICE TO PROSPECTIVE EMPLOYEES

### Why are you being asked to bring evidence of your right to work to interview?

The new Immigration, Asylum and Nationality Act 2006 came into effect on 29 February 2008. This strengthened the requirement for employers to check documents to establish a person's eligibility to work in the UK and compliance with any restrictions. New civil penalties were introduced with fines up to £10,000 for each illegally employed worker and unlimited fines and imprisonment of up to 2 years for knowingly employing illegal workers.

Under the Act we are required to check your eligibility to work in the UK **before** you start work. We are therefore asking all candidates to bring proof of their right to work to interview and a copy will be taken. If you do not currently have the right to work, and need to apply for a work permit (before Nov 08) or a certificate of sponsorship (after Nov 08) please note this on your application form and raise at interview.

If you are successful at interview this documentation will be kept on your personnel file. If you are not successful the documentation will be shredded and securely disposed of. If you forget to bring this documentation you will be asked to show the original to the Chief Executive before an offer can be made and contract sent.

### What is Proof?

#### Official Documentation

For further advice on approved documentation, contact the Chief Executive.

#### LIST A

Single documentation:

- A passport showing that the holder is a British citizen or a citizen of the United Kingdom and Colonies having the right of abode in the United Kingdom.
- A passport or national identity card showing that the holder is a European Economic Area (EEA) or Swiss national.
- Residence permit, registration certificate or Home Office or Border Agency document indicating rights of permanent residence to an EEA or Swiss national or family member
- A passport, biometric ID card or other travel documents indicating the holder is exempt from immigration control, is allowed to stay indefinitely in the country or has no time limit on their stay.

Combination documentation:

1. P45, P60, NI number card or letter from an approved Government agency. (Please note that a National Insurance number does not automatically indicate that the individual is eligible to work, and is not sufficient evidence), plus:
  - Immigration Status Document (ISD) with indefinite leave to remain, or
  - Full UK, Channel Islands, Isle of Man or Irish birth certificate, or
  - Full UK, Channel Islands, Isle of Man or Irish adoption certificate, or
  - Certificate of registration or naturalisation as a British citizen, or
  - Letter issued by the Home Office or UK Border Agency indicating indefinite leave to remain.

#### LIST B

Single documentation:

- Passport or travel document endorsed for specific types of work, provided a CoS is not required.



- Biometric Immigration document indicating the person is permitted to stay in the UK and do the work in question.
- A residence card or document issued to a family member of an EEA or Swiss national.

### Combination documentation:

(you must provide one of the following three combination options)

1. \*\*A certificate of sponsorship plus passport, ISD or other travel document indicating entry clearance / leave to remain.
2. Certificate of application for a family member of a national of an EEA country or Switzerland stating that the holder is permitted to take employment which is less than 6 months old (this must be checked by the Border Agency Employer checking service). **or**

An Application Registration Card issued by the Home Office or the Border Agency stating that the holder is permitted to take employment (applies to a limited number of asylum seekers). This must be checked by the Border Agency Employer checking service.

3. P45, P60, NI number card or letter from an approved Government agency **plus** ISD giving limited leave to remain or Letter from the Home Office or Border Agency confirming limited leave to remain.

\*\* This cannot be checked at interview. If you need a work permit / certificate of sponsorship please flag this up on your application form and at interview. See below

### **CERTIFICATES OF SPONSORSHIP (Previously WORK PERMITS)**

If you do not have automatic permission to work in the UK you may still be able to apply for a certificate of sponsorship under the new points based immigration system. This replaces the previous system of applying for a work permit from November 2008.

If you meet the following criteria, Vbranch House may offer you a certificate of sponsorship (CoS). This, along with confirmation of your competence in English and maintenance requirements will be considered by the UK Border Agency when considering your entry clearance / leave to remain in the UK.

Criteria for issuing a CoS:

- The job is in a 'designated shortage' occupation
- It passes the Resident Labour Market Test (RLMT)
- The job is at S/NVQ3 level or above
- Minimum salary levels

For more detailed information about working in the UK please go to the UK Border Agency website <http://www.ind.homeoffice.gov.uk/workingintheuk/>.

### **Workers from EU Accession States**

You can move and live freely in any European Union (EU) member state as a European Economic Area (EEA) national. You do not need permission to enter or remain to live in the United Kingdom.



For further information, including any exemptions go to the website <http://www.ukba.homeoffice.gov.uk/workingintheuk/eea/wrs/>



**ADDENDUM 2****Safeguarding Literature Available at Vranck House**

**New Guidance available, downloadable from [www.gov.uk](https://www.gov.uk) website - <https://www.gov.uk/government/publications/>**

- Keeping Children Safe in Education – Statutory Guidance for Schools and Colleges, Department for Education 2022.
- Working Together to Safeguard Children, Department for Education, July 2018.
- What to do if you are worried a child is being abused: advice for practitioners, Department for Education, March 2015.
- Counter-Terrorism and Security Act 2015.
- The Prevent Duty, The Department of Education, July 2015. [www.devonsafeguarding.org](http://www.devonsafeguarding.org)

**In the Nurse's Clinic:**

"We Can Say No! A Child's Guide" - David Pithers & Sarah Greene

"Who Would Hurt a Child?" - Childwatch

**In the Head of Education's Office and Intranet HUB:**

"Working Together to Safeguard Children" HM Government July 2022

"Keeping Children Safe in Education" DfE 2023

[www.devonsafeguarding.org](http://www.devonsafeguarding.org)

**In the Staff Library:**

What to do if you are worried a child is being abused. HM Government 2015.

DSCB Document "The Golden Rules"

Contact details for MASH

"Are you worried about someone's safety?" document from MASH

**ADDENDUM 3****What to do if you have concerns****Definition**

**Your concern might be directly related to a child or young person seen by you as a pupil at Vranck House or as a clinical referral (outpatient) but it may also arise from adults or siblings associated with that child or young person.**

**What to do**

- 1) If you have any concerns about a child then you should report this to the designated safeguarding lead (i.e. the Head of Education in the case of school children and the designated clinical safeguarding lead in the case of outpatients). The Head of Education (in the case of a school pupil) will decide whether this is a safeguarding issue and if so, will refer the matter to children's social care.
- 2) If the situation remains unchanged and the member of staff should ask for the matter to be re-considered.
- 3) In addition if at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral directly.
- 4) If a member of staff has concerns about another staff member then this should be referred to the head of education. If there are concerns about the head of education then this should be referred to the chair of governors or chair of trustees (or Chief Executive of the Charity).