

GENTLES GUIDANCE LTD

Safeguarding (child protection) Policy

This policy sets out Gentles Guidance's approach to safeguarding and promoting the welfare of children and vulnerable young people. It applies to all aspects of our work and to everyone working for Gentles Guidance.

We believe everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them. We will give equal priority to keeping all children and young people safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

Policy aims

The purpose of this policy is to:

- Identify the names of responsible persons within Gentles Guidance and explain the purpose of their role
- Describe what should be done if anyone within Gentles Guidance has a concern about the safety and welfare of a child/young person whom they are working with
- Identify the particular attention that should be paid to those children/young people who fall into a category that might be deemed "vulnerable"
- Set out expectations in respect of training
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff

- Outline how complaints against staff will be handled
- Set out expectations regarding record keeping
- Outline how the implementation of this policy will be monitored.

COVID-19

We are aware that pupils may be experiencing a variety of emotions in response to the coronavirus (COVID-19) outbreak such as anxiety, stress or low mood. This may particularly be the case for vulnerable children, including those with a social worker and young carers.

All Gentles Guidance employees will be vigilant about the possible impacts of the pandemic on pupils' mental wellbeing and act immediately on any safeguarding concerns, including new concerns where pupils are returning; and share these concerns. We are familiar with the Government's COVID-19: Guidance on supporting children and young people's mental health and wellbeing.

We are aware of the continued importance for all Gentles Guidance employees to liaise with children's social workers and any other relevant safeguarding and welfare partners. We will continuously ensure that arrangements are in place to keep children and young people not physically attending the school setting safe, especially online.

All Gentles Guidance employees who interact with children/young people, will continuously look out for signs that they may be at risk. Any such concerns will be dealt with as per this policy and where appropriate, referrals will be made to relevant agencies and their school setting informed immediately.

1. Definitions

1a. Safeguarding

Gentles Guidance uses definitions of the term 'safeguarding' from statutory guidance.

Safeguarding children is defined in Working together to safeguard children as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

1b. Child

In English law, a child is "anyone who has not reached his or her 18th birthday". The School extends the same level of pastoral care to pupils over 18, but recognises that they have a different legal status.

2. Recruitment

Gentles Guidance carries out safe recruitment checks on everyone who works for us. All roles require a Disclosure and Barring Service (DBS) or Disclosure Scotland check and references before the individual joins us. Many individuals, including those working with Gentles Guidance will be subject to an enhanced DBS check and a check of social media, as their role may bring them into regular contact with children and young people.

Anyone interviewed for a post with Gentles Guidance, will need to show an understanding of safeguarding that is relevant to the role that they are applying for.

3. Expectations of Gentles Guidance employees

The named Designated Safeguarding Leads within Gentles Guidance are as follows;

Marie Gentles (OBE) - Director and Designated Safeguarding Lead

Everyone working for Gentles Guidance has a responsibility to familiarise themselves with this safeguarding policy and the procedures that go with it. They must maintain a proper focus on the safety and welfare of children and young people in all aspects of their work. All employees must have up to date and relevant safeguarding training.

Anyone who works for Gentles Guidance must inform the directors if they or any adult living in their household become(s) the subject of an allegation involving a safeguarding concern or abuse, against a child or vulnerable adult. If anyone is in doubt whether the situation or allegation is relevant they should:

- refer to the [definitions of safeguarding and protection of vulnerable adults](#)
- seek advice from the HR Case Work team or one of the directors

Any allegations of misconduct towards children/young people by those working for Gentles Guidance will be managed using the complaints procedure (see section 12).

4. Safeguarding training

Gentles Guidance is committed to ensuring that all individuals understand their safeguarding responsibilities and that their knowledge is up to date. All staff must complete safeguarding training, inclusive of annual refresher training, including on specific areas of risk and safeguarding practice. In addition, all Gentles Guidance employees will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) as required, to provide them with relevant skills and knowledge to safeguard children and young people effectively. All Gentles Guidance employees receive

annual safeguarding training and all Designated Safeguarding Leads hold up to date Level 3 safeguarding certificates.

5. Learning and improving

We are determined to keep improving our knowledge and understanding of how best to protect children and young people. Gentles Guidance will review its practice regularly to check that it is placing the right emphasis on safeguarding in our work.

6. Acting on safeguarding concerns

Gentles Guidance should not investigate concerns about a child/young person who may be being abused or who are at risk. Gentles Guidance have a responsibility to make sure that concerns about a child/young person are communicated via the correct channels, in line with a school settings policies and procedures, or passed to the relevant agency.

Concerns about children/young people should be referred to the children's social care department of the local authority where the child lives and the child/young persons current place of education.

If anyone is concerned that a child/young person is at risk of being abused or neglected, they should not ignore their suspicions and should not assume that someone else will take action to protect that person.

If anyone working for Gentles Guidance is in any doubt about what to do, they should consult the with the Designated Safeguarding Leads. Anyone working for Gentles Guidance who has concerns about the behaviour of a colleague or another professional must always raise this with the Designated Safeguarding Lead immediately.

All safeguarding concerns are to be shared in writing with the child/young person's school and confirmation from the recipient that this information has been received and understood, must be obtained.

7. Contextual safeguarding

Gentles Guidance acknowledges that abuse can happen in any organisation and in many different contexts. As such, Gentles Guidance also understands the value of Contextual Safeguarding. Contextual Safeguarding is an approach to understanding and responding to, children's experiences of significant harm beyond their families. It recognises that the different relationships that children and young people form in their communities, neighbourhood, schools and online can feature violence and abuse. Parents and carers sometimes have little influence over these contexts and children's experiences of extra-familial abuse can undermine parent-child relationships. Therefore we recognise that we need to engage with individuals and sectors who do have influence over or within extra-familial contexts and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Therefore, we seek to expand the objectives of child protection systems in recognition that children and young people are vulnerable to abuse in a range of social contexts.

8. Responsibilities and immediate action

Safeguarding and promoting the welfare of children and young people is the responsibility of everyone at Gentles Guidance. All employees of Gentles Guidance are required to report instances of actual or suspected child abuse or neglect to their school settings Designated Safeguarding Lead and the director of Gentles Guidance. The name of the Designated Safeguarding Lead for each child or young person with whom Gentles Guidance are currently supporting is noted in the the contract signed by their school and parent or carer. The Designated Safeguarding Lead within Gentles Guidance is Marie Gentles, of whom is the companies director. The named Designated Safeguarding Lead is

the first point of contact when there is a safeguarding concern for a child or young person. When an individual concern/incident is brought to the notice of the Designated Safeguarding Lead, they will be responsible for deciding upon whether or not this should be reported to other agencies as a safeguarding issue. The Designated Safeguarding Lead within the child or young persons school setting must be informed also. Where there is any doubt as to the seriousness of this concern, or disagreement between the Designated Safeguarding Lead and the person reporting the concern, advice will be sought from the Local Authorities Strategic Lead Officer for safeguarding in education services, from the borough in which the child or young person resides.

If a child is in immediate danger or is at risk of harm, Gentles Guidance will work with the child or young persons school and a referral will be made to the Multi Agency Safeguarding Hub (MASH) (or its equivalent in another Local Authority) and/or the police immediately. Gentles Guidance Designated Safeguarding Lead will always be available to discuss safeguarding concerns. If in exceptional circumstances, the Designated Safeguarding Lead of a child or young persons school setting is not available, this should not delay appropriate action being taken. Gentles Guidance employees should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the schools Designated Safeguarding Lead as soon as is practically possible.

9. Types of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child 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 children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child 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 children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child'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.

In addition to these types of abuse and neglect, Gentles Guidance employees will also be alert to following specific safeguarding issues:

Mental Health: We are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Gentles Guidance employees however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that Gentles Guidance employees are aware of how these children's experiences can impact on their mental health, behaviour and education. If a Gentles Guidance employee has a mental health concern about a child, this will be shared with the Designated Safeguarding Lead with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on Mental Health and Behaviour in Schools.

Child Criminal Exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity

appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the indicators of CCE are: children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education. Any possible CCE case will be shared with the Designated Safeguarding Lead with a view to referring to appropriate agencies following the referral procedures.

Child Sexual Exploitation (CSE): CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17 year old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they can not be considered to have given true consent and therefore offences may have been committed.

Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18. Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this school, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in conjunction with the young persons school setting. This will determine how and when information will be shared with parents and the investigating agencies.

'Sexting': Creating and sharing sexual photos and videos of under-18s is illegal. Sharing youth produced sexual imagery, which is commonly known as 'sexting' covers the incidents where

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

When such an incident involving youth produced sexual imagery comes to a an employee of Gentles Guidance attention, this will be shared with the Designated Safeguarding Lead of the child or young persons school setting with a view to referring to appropriate agencies following the referral procedures. Further information and advice on youth produced sexual imagery is available in the non-statutory guidance produced by the UK Council for Child Internet Safety (UKCCIS) 'Sexting in schools and colleges'.

Serious violence: All Gentles Guidance employees will be made aware of indicators, which may signal that children currently receiving our support are at risk from, or are

involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All Gentles Guidance employees will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the Designated Safeguarding Lead. Further advice on these is available in the Home Office documents Preventing youth violence and gang involvement and Criminal exploitation of children and vulnerable adults: county lines.

Child criminal exploitation and county lines: Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation can affect any child or young person (male or female) under the age of 18 years; can still be exploitation even if the activity appears consensual; can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence; can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. If a Gentles Guidance employee suspects the child or young person they are working with to be involved in any form of criminal exploitation, they will inform the Designated Safeguarding Lead and their school setting immediately.

Peer on peer abuse: Children are capable of abusing their peers. This can take different forms, such as bullying (including cyberbullying), physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; violence, particularly pre-planned, forcing other children to use drugs or alcohol, initiation/hazing type violence and rituals), emotional abuse (blackmail or extortion, threats and intimidation), sexual violence, such as rape, assault by penetration and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, sexting, sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting) and sexual exploitation (encouraging other children to engage in inappropriate sexual behaviour, having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts) and upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Upskirting is now a criminal offence. Although it is more likely that girls will be victims and boys perpetrators, all peer on peer abuse is unacceptable and will be taken seriously. We do not tolerate these or pass them off as "banter", "just having a laugh" or "part of growing up". Gentles Guidance has a strong commitment to an anti-bullying policy and will consider all coercive acts and peer on peer abuse within a Child Protection context. Any possible peer on peer abuse case will be shared with the Designated Safeguarding Lead and the child or young persons school setting with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on Preventing and Tackling Bullying.

Sexual violence and sexual harassment between children: Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be

perpetrated by boys. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. Gentles Guidance employees will share any concerns about or knowledge of such incidents immediately with the child or young persons school settings Designated Safeguarding Lead with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. Further information is available in 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "Keeping children and young people in education".

Domestic abuse: Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. If a Gentles Guidance employee has a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the child or young persons school settings Designated Safeguarding Lead with a view to referring to appropriate agencies.

Violence Against Women and Girls (VAWG): VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings

together multiple forms of serious violence such as crimes committed in the name of “honour”; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If a Gentles Guidance employee has a concern about or knowledge of any VAWG incidents, they will share it immediately with the child or young persons school settings Designated Safeguarding Lead with a view to referring to appropriate agencies.

So-called ‘honour-based’ abuse (HBA) (including Female Genital Mutilation and

Forced Marriage): HBA includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. If a Gentles Guidance employee has a concern about or knowledge of a child that might be at risk of HBA or who has suffered from HBA, they will share it immediately with the child or young persons school settings Designated Safeguarding Lead with a view to referring to appropriate agencies.

Female Genital Mutilation (FGM): FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death. FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. The practice is not required by any religion. FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of

violence against women and girls. FGM is prevalent in 30 countries and is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, The Occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia. FGM is illegal in the UK. It is estimated that approximately 60,000 girls aged 0-14 were born in England and Wales to mothers who had undergone FGM and approximately 103,000 women aged 15-49 and approximately 24,000 women aged 50 and over who have migrated to England and Wales are living with the consequences of FGM. In addition, approximately 10,000 girls aged under 15 who have migrated to England and Wales are likely to have undergone FGM. We note a new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions to report 'known' cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children's homes in England. The duty does not apply in relation to suspected cases – it is limited to 'known' cases' (i.e. those which are visually identified or disclosed to a professional by the victim). It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document "Mandatory Reporting of Female Genital Mutilation – procedural information"

All Gentles Guidance employees will personally report to the police cases where they discover that an act of FGM appears to have been carried out.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We note The Forced Marriage Unit's statutory guidance and especially Chapter 7 on page 32 of the Multiagency guidelines, which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities. Any possible forced marriage case will be shared with the child or young persons school settings Designated Safeguarding Lead with a view to referring to appropriate agencies.

Preventing Radicalisation: The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). Examples of the ways in which people can be vulnerable to radicalisation and the indicators that might suggest that an individual might be vulnerable:

- Example indicators that an individual is engaged with an extremist group, cause or ideology include: spending increasing time in the company of other suspected extremists; changing their style of dress or personal appearance to accord with the group; their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause; loss of interest in other friends and activities not associated with the extremist ideology, group or cause; possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups); attempts to

recruit others to the group/cause/ideology; or communications with others that suggest identification with a group/cause/ideology.

- Example indicators that an individual has an intention to use violence or other illegal means include: clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills; using insulting or derogatory names or labels for another group; speaking about the imminence of harm from the other group and the importance of action now; expressing attitudes that justify offending on behalf of the group, cause or ideology; condoning or supporting violence or harm towards others; or plotting or conspiring with others.
- Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include: having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

Private Fostering: Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great

uncles and cousins are not regarded as close relatives. The law requires that the local Council should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity. If a Gentles Guidance employee becomes aware of a child in a private fostering arrangement, they will notify the child or young persons school setting.

10. Referrals

We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or other children. Ultimately, all our systems and processes operate with the best interests of the child at heart. Referrals to services regarding concerns about a child or family typically fall into three categories:

- Early Help Services
- Child in need - Section 17 (Young peopleAct 1989) referrals
- Child protection - Section 47 (Young peopleAct 1989) referrals

Each boroughs Safeguarding Board Multi Agency Threshold Guide sets out the different levels of need and detailed guidance about how concerns within these different levels should be responded to by various agencies. Prior to any written form being sent as a referral to social care, Gentles Guidance would discuss any concerns with the child or young persons school setting and where appropriate, have a verbal consultation with the MASH social worker or manager, to ensure that making a referral is an appropriate action. The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual

abuse, Honour Based Abuse, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral.

If Gentles Guidance were to make a referral, the local authority should make a decision within one working day of a referral being made about the type of response that is required and should let us, as the referrer, know the outcome. We will follow up if this information is not forthcoming.

If after a referral, the child's situation does not appear to be improving, we will consider following local escalation procedures to ensure that the concerns have been addressed and most importantly, that the child's situation improves. The Early Help Referral Form will be used to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services. If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention will be requested. Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation.

11. Vulnerable pupils

Particular vigilance will be exercised in respect of pupils who are subject to Child Protection Plan and any incidents or concerns involving these children/young people will be reported immediately to the allocated Social Worker. If the pupil in question is a Looked-After child, this will also be brought to the notice of the Designated Person with responsibility for children/young people in public care. Schools settings who have commissioned the services of Gentles Guidance should share with us the fact a child has a

social worker before our work begins. This will be considered as a matter of routine.

Where children and young people require a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

We acknowledge that children and young people with special educational needs (SEN) and disabilities can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

Gentles Guidance also acknowledges the additional need for support and protection of children who are vulnerable by virtue of homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions, pupils who are excluded from school and pupils where English is an additional language, particularly for very young children, using the translation service if necessary.

12. Complaints/allegations made against a Gentles Guidance employee

Gentles Guidance takes all complaints made against an employee very seriously. All such complaints will be brought immediately to the attention of the director. In cases where one or both of the director is the subject of the allegation or concern, they will be reported to the schools Designated Safeguarding Lead(s)/school's governors in order that they may activate the appropriate procedures. These procedures are used in respect of all cases in which it is alleged that any Gentles Guidance employee that provides consultation and/or support for young people under 18 years of age has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or young person in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Gentles Guidance has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child and who has been removed from working in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals will be made as soon as possible after the resignation or removal of the individual.

13. Allegations made against a child or young person

There are many ways that a child may be abusive towards others. A child who is displaying abusive behaviour may not realise they are doing so. When a child abuses another child, it is sometimes called 'peer on peer abuse' or 'peer abuse' (Department for Education, 2020; Department of Health, 2017). Allegations may involve but are not inclusive of:

- Bullying or cyberbullying
- Online abuse
- Physical abuse
- Sexting

- Harmful sexual behaviour
- Sexual abuse

There are a range of ways concerns might be raised.

- A child or adult might make a direct allegation of abuse by a child or young person.
- A child or adult might tell you they're uncomfortable with a child or young person's behaviour. They may not realise the behaviour is abusive.
- A member of staff or volunteer might observe behaviour that gives cause for concern and make a report following your organisation's safeguarding procedures.
- Gentles Guidance may be informed that a child or young person is the subject of an investigation.
- A child or young person might tell you they have harmed someone else or are at risk of doing so.
- A child or adult might make a direct allegation of abuse by a child or young person.
- A child or adult might tell you they're uncomfortable with a child or young person's behaviour. They may not realise the behaviour is abusive.
- A member of staff or volunteer might observe behaviour that gives cause for concern and make a report following your organisation's safeguarding procedures.

When an allegation is made by a pupil against another student, Gentles Guidance employees should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the Designated Safeguarding Lead and Director should be

informed. A factual record should be made of the allegation and the child or young persons school setting should be informed immediately. The Designated Safeguarding Lead will follow through the outcomes of the discussion and make a social services referral where appropriate. The Designated Safeguarding Lead will make a record of the concern, the discussion and any outcome and keep a copy on file where appropriate. If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the student being complained about and the alleged victim). Where neither social services nor the police accept the complaint, Gentles Guidance will support the child or young persons school to conduct an investigation into the matter using the school's usual disciplinary procedures. In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan. The plan should be monitored and a date set for a follow-up evaluation with everyone concerned. All information gathered or received by Gentles Guidance will be shared with the child or young persons school settings Designated Safeguarding Lead, with a view to referring to appropriate agencies.

14. Records

Brief and accurate written notes will be kept of all incidents and child protection or child in need concerns relating to individual pupils. These notes are significant especially if the incident or the concern does not lead to a referral to other agencies. This information may be shared directly with other agencies as appropriate. All contact with parents and external agencies will be logged. Gentles Guidance will take into account the views and wishes of the child who is the subject of the concern but will be alert to the dangers of colluding with dangerous "secrets". Child protection records are not open to pupils or parents. All child protection records or concerns are kept securely and separately from educational records. They may only be accessed by the Designated Safeguarding Lead and the senior managers of the child or young persons school setting.

15. Working in partnership with parents

It is our policy to work in partnership with parents or carers to secure the best outcomes for the children and young people we work with. We will therefore communicate as clearly as possible about the aims and intended outcomes when working with individual children and young people

- We will use clear statements in our emails and correspondence.
- We will liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families.
- We will make available a copy of this policy to any parent who requests it. The policy will also be available through our website www.gentlesguidance.com
- We will keep parents informed as and when appropriate.

Whole company training	Date undertaken	Date to renew
Designated Safeguarding training (Level 3)	March 2023	March 2025

Policy to be reviewed in March 2024. For more information or to discuss anything within this policy further please contact us via info@gentlesguidance.com. www.gentlesguidance.com



GENTLES GUIDANCE LTD

Privacy Policy

1. GDPR

When you enter into a contract with us there will be personal information about you relating to that contract such as your name, the child in question's name, contract details, delivery details, and correspondence with us about the contract. We need certain information to carry out our contract with you and you must provide this in order to enter into a contract with us (or as required under that contract). This information generally includes:

- Your name
- Your email address
- Your phone number
- Your address
- The child's name
- The child's date of birth

- The name and contact details of your child's school/provision

Other correspondence or interaction (for example by email, telephone, post, SMS or via our website) between you and us, may include personal information (such as names and contact details) in that correspondence. This may include enquiries, reviews, follow-up comments or complaints lodged by or against you and disputes with you or your organisation. We may also collect details of phone numbers used to call our organisation and the date, time and duration of any calls. We will keep and use that information to carry out our contract with you (if applicable), to comply with any legal requirements for us to maintain certain records or carry out certain verifications, and/or for our legitimate interests in dealing with a complaint or enquiry and administering any services we offer, as well as to review and improve our offerings, including troubleshooting, data analysis, research, statistical and survey purposes. Where your information relates to a contract, it is kept for a period of up to seven years after our support has concluded to enable us to deal with any after enquiries or claims and as required for tax purposes. Any other information is kept for seven years.

We may collect your name and contact details (such as your email address, phone number or address) in order to send you information about our products and services which you might be interested in. We may collect this directly from you, or through a third party. You always have the right to "opt out" of receiving our training or support offers. If we send you any marketing emails, we will always provide an unsubscribe option to allow you to opt out of any further marketing emails. If you "opt-out" of our marketing materials you will be removed from our marketing list.

Gentles Guidance Ltd. is committed to compliance in respect of personal data, and the protection of the "rights and freedoms" of individuals whose information Gentles Guidance collects and processes in accordance with the General Data Protection Regulation (GDPR). Compliance with the GDPR is described by this policy and other relevant company policies, along with connected processes and procedures. Partners and

any third parties working with Magic Behaviour Management, and who have or may have access to personal data, will be expected to have read, understood and to comply with this policy.

If you have any questions about this notice or how we collect and use personal information about you please email info@gentlesguidance.com

2. Legal Claims

Where we consider there to be a risk that we may need to respond to a legal claim, we may retain your personal information as necessary for our legitimate interests in ensuring that we can properly respond to such legal claims. We may also need to share this information with our insurers or legal advisers. How long we keep this information for will depend on the nature of the claim and how long we consider there to be a risk that we will need to respond to a claim.

We may share your personal information with third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our agreements with you or to protect the rights, property, or safety of us, or our customers.

3. Data Security

Gentles Guidance have put in place appropriate internal security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where necessary.

4. Your rights

Data protection law gives you a number of rights when it comes to personal information we hold about you. The key rights are set out below. More information about your rights can be obtained from the Information Commissioner's Office (ICO). Under certain circumstances, by law you have the right to:

- Be informed in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why we are providing you with the information in this notice. If you require any further information about how we use your personal information, please let us know.
- Request access to your personal information (commonly known as a "data subject access request").
- Request correction of the personal information that we hold about you.
- Request erasure of your personal information in circumstances where there is no good reason for us continuing to process it.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and you are refuting the existence of a valid legitimate interest.
- Request the transfer of your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.

- Withdraw your consent. In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate interest in doing so.
- Lodge a complaint. If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority (if you are in the UK, this will be the ICO).
- To exercise your rights as defined under GDPR and highlighted in this section, please contact us at info@gentlesguidance.com

5. Changes to this privacy notice

Any changes we make to our privacy notice in the future will be posted on our website and where appropriate, notified to you by e-mail or otherwise. Please check back frequently to see any updates or changes to our privacy notice.

To be reviewed - March 2025. For more information or to discuss anything within this policy further please contact us via info@gentlesguidance.com. www.gentlesguidance.com