



Feeling safe, staying safe

Safeguarding Children and Young People Policy and Procedure

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Policy Implemented:	April 2016
Last Reviewed:	August 2018
Significant Changes:	No
Next Review Due:	August 2019

Summary

Safeguarding and protecting customers effectively is central to all of Ambito's work and supports Ambito's strategy to maximise the life opportunities and the health and wellbeing of disabled people. All staff and volunteers recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for our customers or not.

This is the latest revised version of Ambito Safeguarding Children and Young People Policy and Procedures. There is Guidance available as a separate document to help operationalise this. This policy is issued in accordance with the statutory safeguarding responsibilities, set out in the Children Act 1989, Children Act 2004 and, in England the associated statutory guidance, Working Together to Safeguarding Children (DfE, 2018) and Keeping Children Safe in Education (DfE, 2018). And in Wales, the associated statutory guidance Safeguarding Children; Working Together under the Children Act (Welsh Government, 2006) Social Services and Wellbeing Act 2014 Codes of Practice and Statutory Guidance (Welsh Government, 2017), Keeping Learners Safe (Welsh Government, 2015) and Safeguarding Children in Education: handling allegations of abuse against teachers and other staff (Welsh Government, 2014).

Ambito takes its safeguarding responsibilities very seriously and has a zero-tolerance approach to abuse. The policy, procedure and accompanying guidance detailed applies to all children and young people regardless of their age, ethnicity, disability, religion or gender.

Ambito provides services and support to both children and adults. Throughout the course of Ambito work, a 'think-family' approach should be taken when following this procedure. This means that where there is a concern that an adult is also at risk from abuse and/or neglect Ambito's Safeguarding Adults Procedure should also be followed.

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In addition to this Ambito policy, local authorities and other commissioners may have their own policies, procedures and guidance which Services must comply with. These policies should complement this Ambito policy. However, there may be additional requirements put in place by local authorities and other commissioners and these must be adhered to. Changes must not be made to Ambito’s corporate policies and procedures without corporate approval but, where needed, local procedures should be developed to accompany these, where required.

Safeguarding Children and Young People Policy

This is a mandatory policy for all Ambito Services to adhere to and may not be changed unless it has been through the corporate quality assurance process

1. Policy

1.1. Policy statement

- 1.1.1. The purpose of this policy and procedure is to provide all staff and volunteers in Ambito with a framework to prevent and minimise the risk of harm to children and young people who use Ambito's Services. All staff and volunteers in Ambito share this responsibility and must use this document when dealing with concerns of abuse or neglect. The procedure details the steps that individuals are expected to take when presented with concerns of abuse or neglect.
- 1.1.2. This procedure must not be read in isolation, but be read alongside the relevant Local Safeguarding Partners Policy and Procedures (such as local authorities, the police and health organisations). It is also advisable to read and have access to Ambito's Safeguarding Adults at Risk Policy and Procedure, this is to ensure these documents are familiar to staff in line with the 'think family' approach.
- 1.1.3. In addition to this central policy, each school must have a local policy in line with the Keeping Children Safe in Education (2018). The local policy should support the implementation of this policy at a local level and must not conflict with the central policy in any way. The local policy must outline local procedures and the requirements of local multi-agency teams and authorities.

1.2 Definitions used in procedure and what is abuse?

Child Protection - is one part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect children specifically suffering, or likely to suffer significant harm.

Children - as in the Children Acts 1989 and 2004, a child is anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital, in prison or in a Young Offenders' Institution, does not change his or her status or entitlement to services or protection under the Children Act 1989.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

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- taking action to enable all children to have the best outcomes. (DfE, 2018)

Significant harm - The Children Act 1989 introduced the concept of Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

There are no absolute criteria when judging what constitutes Significant Harm. Sometimes, a single traumatic event may constitute Significant Harm. In other circumstances Significant Harm is caused by the cumulative effect of significant events, both acute and long-standing, or the damaging impact of neglect which interrupts, and changes or damages the child's physical and psychological development.

Where the question of whether harm suffered by a child is significant turns to the child's health and development; his health or development shall be compared with that which could reasonably be expected of a similar child. It is important always to take into account the child's reactions, and his or her perceptions, according to the child's age and understanding.

Harm -The **Children Act 1989** defines '**harm**' as "ill-treatment or the impairment of health or development". Whereby a threshold of significant harm is necessary for statutory intervention, for the purpose of Ambito procedures a threshold of significant harm is not necessary in order for staff and volunteers to act. Where there is a concern that **any level of harm** has occurred, or is likely to occur then actions must be taken and/or measures put in place to secure the safety and welfare of the child /children to prevent the risk of further and more significant harm. In this instance, other processes such as risk management or early help assessment maybe more appropriate. (Please refer to guidance on thresholds for intervention)

Categories of Abuse- in accordance with Working Together to Safeguard Children (DfE, 2018) there are 4 recognised categories of abuse when safeguarding children and young people:

- Physical abuse
- Sexual abuse and exploitation
- Emotional abuse
- Neglect

Abuse can be carried out in different forms, and there are a number of specific safeguarding issues or issues that interface with abuse that children and young people can experience that we must be particularly aware of (in alphabetical order; this is not an exhaustive list):

- Abuse linked to witchcraft and other faith and spiritual beliefs
- Children missing from home, care or education
- Cyber-bullying / abuse online, including use of mobile phones and sexting
- Domestic violence
- Extremism and Radicalisation
- Fabricated or Induced Illness
- Female Genital Mutilation
- Forced Marriage
- Honour-based violence
- Modern slavery

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- Peer on peer abuse
- Private fostering arrangements
- Restraint and Physical Intervention

Please see separate guidance documents on signs and indicators of abuse and other safeguarding issues which contains electronic hyperlinks to statutory guidance Keeping Children Safe in Education (DfE, 2018) and Keeping Learners Safe (Welsh Government, 2015) for further information about these specific issues.

E-Safety

Ambito recognises that advances in technology and the use of mobile phones, the web and social media in everyday life, means a greater risk of abuse and exploitation via this technology and online, unless there are appropriate measures and monitoring in place. Youth produced sexual imagery, otherwise known as sexting, is becoming a widespread problem. Where it is discovered that children and young people are sharing sexual images online or on their phones this must be reported in accordance with this Safeguarding Children Policy and Procedure. (Please see Ambito's position statement and separate guidelines on '[E-Safety](#),' '[The Use of Mobile Technology](#)' and local policies and guidance where required)

Peer on peer abuse

The conduct of children and young people towards other children will predominantly be dealt with via local behaviour policies however Ambito recognises that more serious incidents can occur, which amounts to the abuse of children and young people by their peers. School settings are where the risk of peer on peer abuse is greatest. It is a requirement in line with this policy that all schools assess the risk of this type of abuse and have their own policy and procedure. (Please see Ambito's position statement and separate guidelines on [Peer on Peer abuse](#), and local policies where required)

Child Sexual Exploitation

Ambito recognises the seriousness of sexual exploitation and that it is everybody's business to take steps to safeguard and protect children and young people from this type of abuse. (see Ambito's position statement and separate guidelines on '[Child Sexual Exploitation](#)' and local policies, where required.)

Radicalisation and Extremism

Ambito recognises that the issue of radicalisation is a growing safeguarding concern that can affect children and young people. Please refer to Ambito's position statement and additional guidelines on '[preventing radicalisation and extremism](#)' and your own local authority's policies on this subject. Any concerns that someone you come into contact with through your work is being radicalised this procedure must be followed, and your concern raised with your Designated Safeguarding Advisor.

Children missing from home, care or education

Ambito recognises that when children run away or go missing that they are at increased risk of all forms of abuse and exploitation, and that we have responsibilities in reporting this to the authorities so that a multi-agency approach can be taken where there are concerns. All Ambito

services (in social care and education) are required to have local procedures on what to do when a child or young person goes missing. (Please see separate Ambito statement and guidance on this issue, and local procedures as required)

Female Genital Mutilation (FGM)

FGM is an internationally recognised violation of the human rights of girls and women. Ambito recognises the seriousness of FGM and that staff have a mandatory duty to report. Teachers and regulated health and social care professionals have a direct duty to report incidences of reported FGM to the police; other staff should liaise with their DSA. (See separate guidance document with electronic link to government guidance on mandatory reporting of [female genital mutilation](#) (DfE and Home Office, 2018).

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the service and/or can occur between children offsite. All staff must consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that services provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

1.3 Principles

- 1.3.1 When following this procedure and when working within the local multi-agency safeguarding children procedures this should be guided by the following key principles:
- children have a right to be safe and should be protected from all forms of abuse and neglect, **and any level of harm**;
 - safeguarding children is everyone's responsibility;
 - it is better to help children as early as possible, before issues escalate and become more damaging; and
 - children and families are best supported and protected when there is a co-ordinated response from all relevant agencies.

1.3.2 Safeguarding is everyone's responsibility

Everyone who works with children has a responsibility for keeping children safe. No single professional can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with children has a role to play in identifying concerns, sharing information and taking prompt action.

1.3.3 A child-centred approach

A child-centred approach should underpin all safeguarding practice. Failings in safeguarding systems are too often the result of losing sight of the needs and views of

the children within them, or placing the interests of adults ahead of the needs of children.

1.3.4 Children want to be respected, their views to be heard, to have stable relationships with professionals built on trust and to have consistent support provided for their individual needs. This should guide the behaviour of all staff and volunteers in Ambito. Anyone working with children should see and speak to the child; listen to what they say; take their views seriously; and work with them collaboratively when deciding how to support their needs. Children should be empowered to know how to protect themselves from abuse.

1.3.5 **Older Children and Capacity to Make Decisions**

Whilst the law states that a child is such until they reach 18 years of age it is widely recognised that, as a child gets older, they do attain some rights over making decisions. 'Gillick competency' and 'Fraser guidelines' are used to help assess whether a child has the maturity to make their own decisions and to understand the implications of those decisions.

In the high court Mr. Justice Woolf ruled

"...whether or not a child is capable of giving the necessary consent will depend on the child's maturity and understanding and the nature of the consent required. The child must be capable of making a reasonable assessment of the advantages and disadvantages of the treatment proposed, so the consent, if given, can be properly and fairly described as true consent."

Lord Scarman's comments in his judgement of this case in the House of Lords (1985) are often referred to as the test of "Gillick competency":

"...it is not enough that she should understand the nature of the advice which is being given: she must also have a sufficient maturity to understand what is involved."

He also commented more generally on parents' versus children's rights:

"Parental right yields to the child's right to make his own decisions when he reaches a sufficient understanding and intelligence to be capable of making up his own mind on the matter requiring decision."

Service Managers must seek appropriate advice if there is any doubt in these matters.

1.3.6 **Preventing abuse**

Prevention of abuse is the primary goal. Ambito is committed to ensuring it has systems in place that minimise the risk of abuse.

Prevention starts with ensuring we recruit the right staff, that are suitable to work with children and young people. (See Ambito's Safer Recruitment Policy and Procedure)

Prevention involves promoting awareness and understanding and supporting children to safeguard themselves from the risk of abuse. It is about having effective systems and

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procedures in place for the provision of care and support, education, training and supervision, and open learning cultures. This principle must be applied when following this procedure. (Please refer to separate guidance on 'Prevention in Safeguarding')

1.3.7 Safeguarding Disabled Children

As a Pan Disability Organisation Ambito recognises the increased vulnerability of disabled children. The **Safeguarding Disabled Children Practice Guidance** (DSCF 2009) suggests that disabled children are at an increased risk of abuse and the presence of multiple disability increases the risk of both abuse and neglect. A disabled child may be more vulnerable due to:

- The need for practical assistance in daily living, including intimate care from what may be a number of carers;
- An inability to communicate concerns;
- Carers working with a disabled child in isolation or the child is socially isolated;
- Professionals identifying with parents/carers and losing focus on the impact of familial stresses on the child;
- Bullying and intimidation due to disability and the disproportionate impact of this
- Low self-esteem/negative views of themselves;
- Lack of access to "Keep Safe materials";
- Targeting by some sex offenders in the belief that they are less likely to be detected.

1.3.8 Safeguards for disabled children are essentially the same as for non-disabled children and should include, enabling them to:

- Make their wishes and feelings known;
- Receive appropriate personal, social and health education;
- Raise concerns;
- Have a means of communication and range of adults with whom they can communicate;

1.3.9 All Ambito Services for children must have:

- An understanding that the welfare of a child is paramount.
- An understanding behaviour, mood, injury may relate to possible abuse not just the child's SEN or disability.
- An explicit commitment to understand disabled childrens' safety and a culture of openness;
- An absolute focus upon the child and the child's need for protection from harm, whilst being committed to working in partnership with parents/carers;
Policies, procedures, local protocols and training for staff on good practice in intimate care, working with children of the opposite sex, handling difficult or challenging behaviour, anti-bullying strategies and sexual behaviour among young people, especially those living away from home.

1.3.10 Information sharing

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Early sharing of information is key to providing effective support where there are emerging concerns. The safety and welfare is likely to be more important than concerns about sharing information.

No-one should assume that someone else will pass on information which they think may be critical to the safety and welfare of a child or young person at risk of abuse or neglect. If anyone has concerns about a child's welfare and believes they are suffering abuse or neglect, they should immediately share their concerns with their line manager.

Ambito is committed to working with its safeguarding partners, cooperating and sharing information when there are concerns about the safety or welfare of a child and when we know other children and/or adults could also be at risk. All services must be fully informed and signed up to their local authority sharing information protocols. (See separate guidance on '[Information Sharing and Safeguarding Children](#)')

1.3.11 Record keeping

Ambito recognises that good records and record keeping is integral to effective safeguarding practice and prevention. Records must be kept to evidence any developments in response to a concern and the communication and sharing and exchange of information with relevant professionals and agencies. All services must ensure there are confidential safeguarding files held for individual children and young people, which are in a safe, secure, central location. This is so that relevant managers have access to this information to ensure concerns are acted on appropriately and risks are being effectively managed.

1.4 Who is covered by this policy?

- 1.4.1 The application of this policy is mandatory for all Ambito services staff, volunteers, agency/bank staff and all other Ambito representatives. This policy applies to our services in Social Care and Education, and must be used alongside the requirements of each respective local authority and their local multi-agency safeguarding children procedures.
- 1.4.2 This policy and procedure will be communicated/disseminated across the workforce through its promotion by Safeguarding Officers, Educational/Regional and Senior Management Teams, email communication by the Safeguarding Manager and online via the Quality team newsletter.
- 1.4.3 Staff understanding of this policy will be assured through training, assessment of competency and supervision.

1.5 Areas of Governance

- 1.5.1 This policy has been written with expert contribution from appropriate stakeholders within Ambito. The Ambito Services Quality Group will monitor, reflect on and gain

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organisational learning from Safeguarding Children data relating to customers who are using Ambito services.

- 1.5.2 This policy will be reviewed and updated annually from implementation by Ambito's Safeguarding Manager unless legal changes demand a more timely amendment.

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This procedure has been developed in the context of best practice. Services will need to review local processes to operationalise this procedure in the most effective way to suit the service.

2 Procedure

Step 1 – Raising a concern (previously known as the alert)

Step 2 – Reporting a concern (the safeguarding referral)

Step 3 – Initial Enquiries (by the Local Authority to make decisions on further action)

Step 4 - The Response

- Issue resolved during initial enquiries / single agency response (actions to be taken by Ambito or another agency)
- Early Help Assessment / Common Assessment Framework
- Statutory multi-agency assessment via Section 17 The Children Act 1989
- Section 47 child protection enquiries

Step 5 –Planning Meeting (strategy meeting)

Step 6 - Child Protection Enquiries

Step 7 –Case Conference

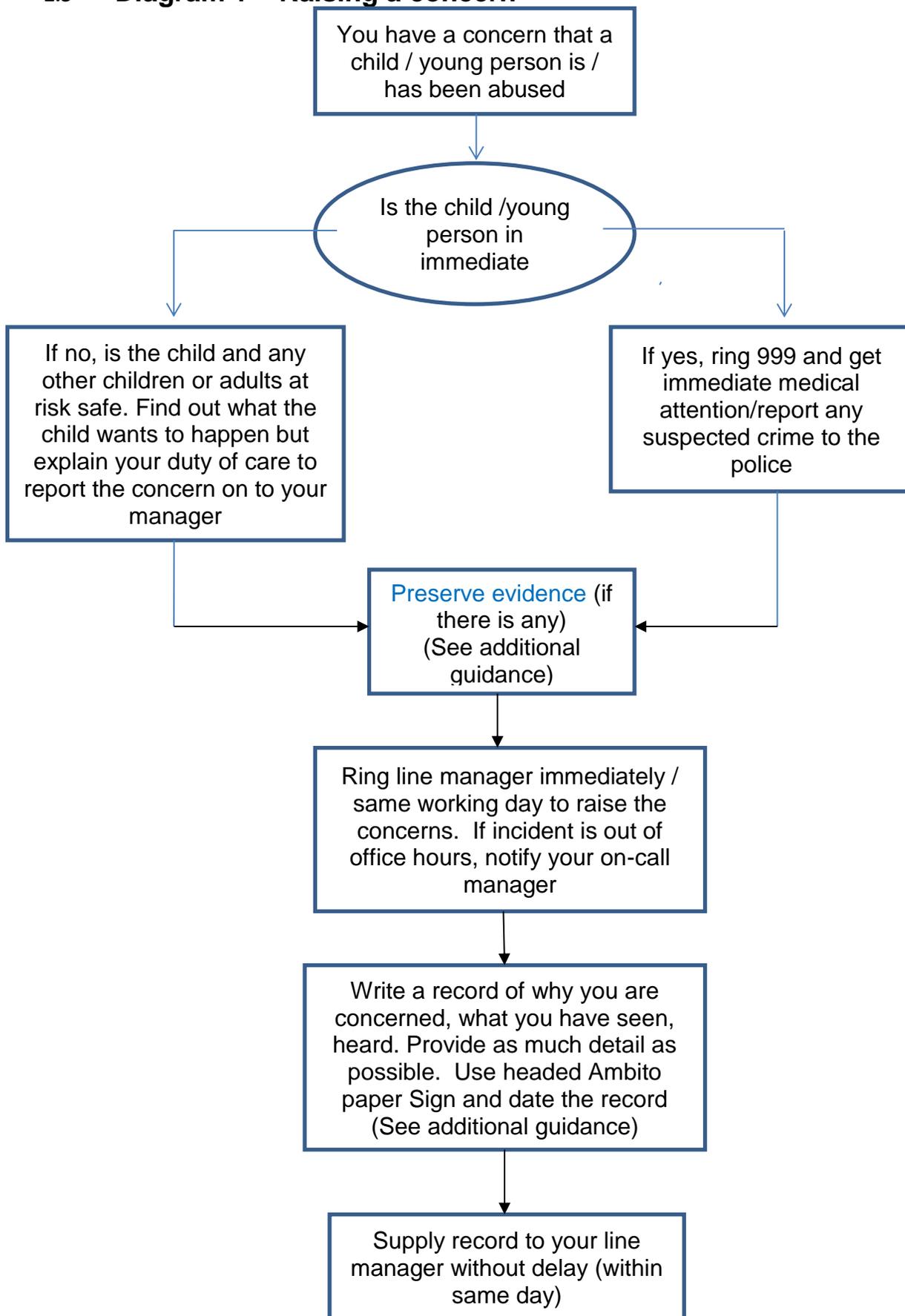
Step 8 - Closure

The Flowcharts

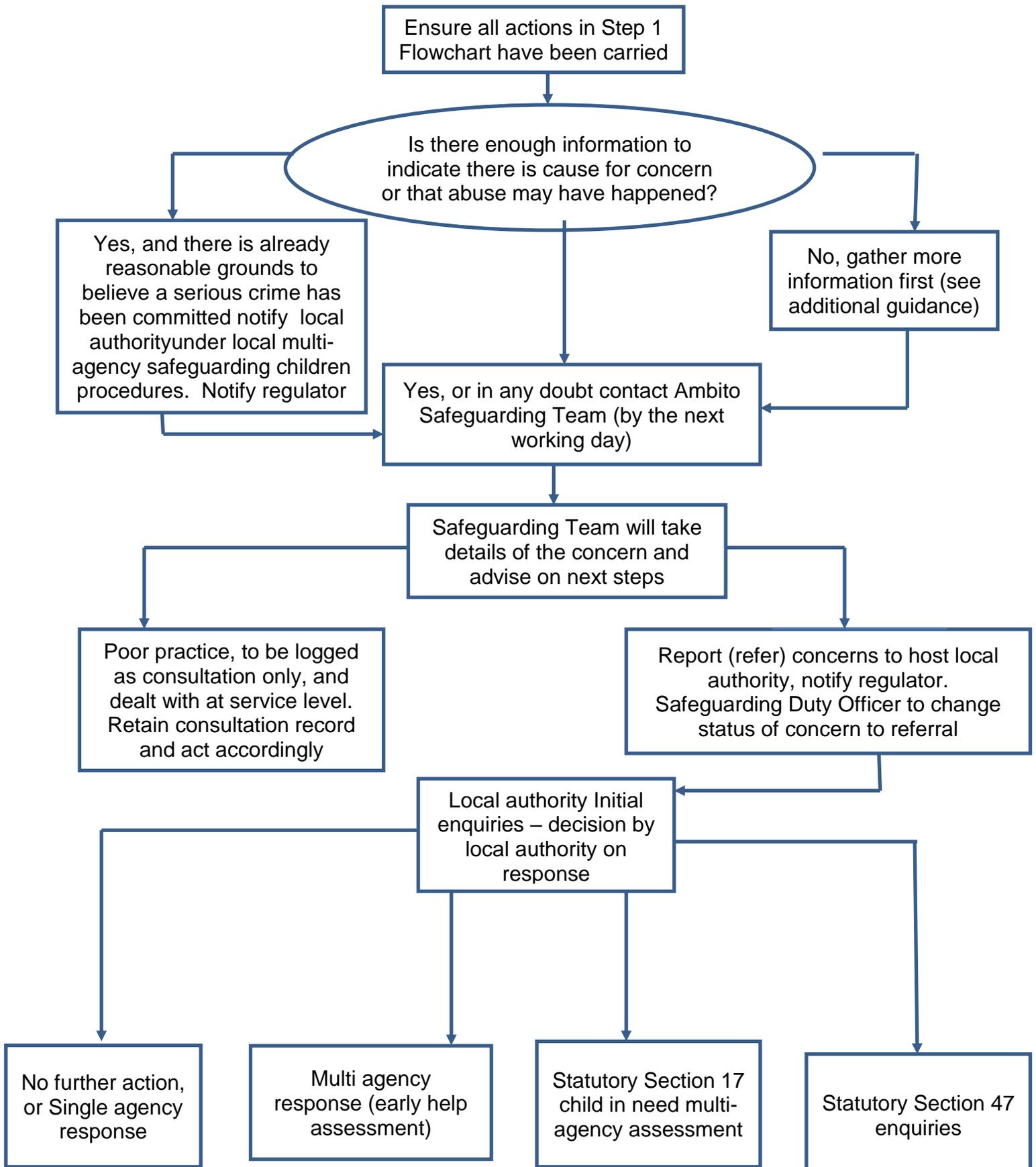
Diagram 1 – Raising a concern

Diagram 2– Reporting a concern (the safeguarding referral)

2.3 Diagram 1 – Raising a concern



2.4 Diagram 2 Reporting (referring) a Concern – Flowchart for DSAs and Managers



Step 1-Raising concerns (immediately/same working day, previously known as the alert).

This step of the procedure is relevant to all Staff and Volunteers. Staff and Volunteers should familiarise themselves with this and raise any training needs with their line manager.

2.5 Step 1: Raising Concerns

2.5.1 All staff (paid and volunteers) **have a duty** to act immediately (or on the same working day at a minimum), and raise concerns to their Designated Safeguarding Advisor (DSA) or a line manager (alternatively an on-call manager). A safeguarding concern can be about an individual or a group and the concern itself can be that the individual or group:

- **Is being** abused or neglected; **or**
- **Has been** abused or neglected; **or**
- **Is at risk** of being abused or neglected.

2.5.2 The suspected abuse can happen **anywhere**;

- in one of our services,
- where the customer lives,
- in a hospital,
- school, sports or holiday club,
- or out in the community (this is not an exhaustive list)

2.5.3 The safeguarding concern can be as a result of:

- What you have **witnessed**
- What you **suspect** (as long as there is reasonable cause to suspect that abuse could be happening)
- What a child or a third party (e.g. staff member, member of the public, another external professional) has told you.
-

2.5.4 The person who has or may have caused harm to a child could be any of the following (this is not exhaustive):

- A paid staff member, at any level of the Organisation
- A volunteer
- Another child or adult
- A member of the public
- A relative
- Another professional / external Organisation

Acting in an emergency / taking immediate action

2.5.5 The first priority is making sure that the child is safe. In a situation where there is immediate risk of harm or need for treatment, all staff ~~must be~~ **are** authorised to call the

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police and/or ambulance service without seeking permission by a line manager, if not doing so would cause unnecessary delay in safeguarding the child's health and welfare.

- 2.5.6 Failing to act immediately in such cases may later be construed as negligent or failing in duty of care.

Preserving evidence

- 2.5.7 In cases where a serious sexual assault or physical assault may have taken place, evidence at the scene will need to be preserved. (See separate guidance on ['Preserving Evidence'](#))

Responding to a child that is directly disclosing abuse

- 2.5.8 Do not make promises about keeping information shared secret. You must explain to the child that you have a duty of care to raise concerns with your manager and that you cannot keep secrets when there is a concern that someone is being harmed. (See separate guidance on ['How to Respond to a Disclosure'](#).) Failing to act is abusive in itself and can unnecessarily prolong abuse.

When abuse is witnessed

- 2.5.9 Take care when intervening to stop abuse; you are not required to take certain actions that if by doing so you are placing yourself or the child at further risk of harm. When the abuse has stopped follow the above steps **'acting in an emergency / taking immediate action'** and **'preserving evidence'**.
Do not approach or question the person who has allegedly harmed the child/children.

When you suspect abuse?

- 2.5.10 When you suspect abuse, there must be grounds for and substance to this. Think about the reasons why you suspect abuse; is this because of something you have seen, something you have been told? Are there a series of signs and indicators that you are concerned about? ([See separate guidance on Signs and Indicators.](#))

Raising concerns with your line manager and record keeping

- 2.5.11 Anyone can make a referral to Children's Social Care. So that the appropriate managers and senior leadership teams can fulfil their responsibilities in safeguarding it is best and Ambito procedure that you report your concerns immediately with a DSA, line manager or on-call manager; **do not** share or discuss your concerns with anyone else in the service. Write a record of your concern as soon as possible after the incident / disclosure and provide to your line manager or other relevant manager. Written records must be as detailed as possible, and include what you saw, what you heard, and who was present. (See separate guidance on ['Writing a record and record keeping'](#).)

Outside normal office hours

2.5.12 In the event that you suspect a child or young person has been abused or been placed at serious risk in an evening, bank holiday or a weekend, you must follow your local on call arrangements and speak with an appropriate line manager without delay. Do not wait until the next day. (Refer to duty poster for necessary contact details and telephone numbers)

Whistleblowing

2.5.13 Whistleblowing is when you raise concerns about unsafe or illegal practice, which can include concerns about abuse and neglect. Your line manager should be your first port of call, but if you feel unable to share information with them because you believe they are implicated or involved then you need to be able to speak to someone else instead. You should be able to raise your concern with your manager's line manager. Or you can follow Ambito's Speak Up Policy and Procedure, which will guide you on what steps to take and, in accordance with the Public Disclosure Act 1998, provide some protection from victimization if you have raised concerns about malpractice, in good faith.

2.5.14 If you have grounds to believe that managers in Ambito are ignoring your concerns and not taking appropriate action then you have the right to go directly to your local authority and/or regulator. Your manager must make sure that these numbers are available to you and displayed somewhere you can access them.

Confidentiality

2.5.15 You must respect and adhere to confidentiality at all times during a safeguarding process. Your line manager will provide feedback to you on what actions are being taken to respond to the concern, but this information must be treated confidentially. Any discussion with other team members will be dealt with as a disciplinary offence. (Please see Ambito Code of Conduct)

2.5.16 If, however the child chooses to discuss their concern further with you do not stop them, but do not probe or ask questions; write a record of what the child has told / communicated to you and tell your line manager immediately after.

Step 2. Reporting concerns (the referral – by the next working day) (Note that steps 2-8 are relevant to Service Managers, DSA's and Safeguarding Officers only)

2.6 Step 2: Reporting Concerns

2.6.1 This stage is relevant to all Managers, Designated Safeguarding Advisors (DSA's) and Ambito Safeguarding Officers. Managers, DSA's and Ambito Safeguarding Officers

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should familiarise themselves with this and raise any training needs with their line manager.

Making a decision to report on the concern

2.6.2 When a manager receives a concern they must decide if harm has occurred, or if there is an allegation or reasonable grounds to suspect that harm has happened or is likely to occur. Consideration must be given on the impact of the alleged incident on the child, any previous incidents, the pattern of abuse or whether this is a one-off? (See additional guidance on [‘patterns and signs and indicators’](#).) Consideration must also be given to the views and wishes of the child, in accordance with principles specified in Section 3 of this procedure “Older Children and Capacity to Make Decisions” and “child-centred practice”.

Information gathering

2.6.3 It may be necessary to gather more information before deciding if there is reasonable cause to believe that abuse may have occurred. This could include checking rotas, daily records, and on occasion may require some **very broad** discussion with staff or children. (See separate guidance on [‘What is Information Gathering?’](#)). Ensure the staff member who raised the concern has written a formal record, and that body maps for bruising and other marks have been completed (see appendix 4 for [body maps](#)).

Contacting Ambito Safeguarding Service for a Consultation

2.6.4 When you are certain (or in any doubt) that there is an allegation of abuse Ambito Safeguarding Service must be contacted using the S1 Form. **This must take place by one working day** of the concern being raised. The line manager (e.g. Principal or Area Manager) should, wherever practicable, be aware of the concern. The Safeguarding Team will discuss the nature and details of the concern, and ask for specific details so that the concern can be added to Ambito’s Safeguarding Database. (See Appendix 1 – [consultation and referral information checklist](#))

2.6.5 The Safeguarding Team will advise on whether this concern needs reporting on to the local authority in accordance with local multi-agency safeguarding children procedures. There may also be other important and immediate actions recommended in order to secure the safety and welfare of the child.

2.6.6 There will be times when it is appropriate to follow local multi-agency safeguarding children procedures before contacting Ambito Safeguarding Service (e.g. if the concern is an emergency situation, is outside normal office hours or when there has already been delay incurred). Where a concern is raised at a weekend and there is an immediate risk of harm to a customer then the local authority must be contacted using their Emergency Duty Number. Ambito Safeguarding Service must then be contacted for a consultation by the next working day

Consultation only – alternative pathways for action

- 2.6.7 The Safeguarding Team may advise that the concern can be dealt with internally at service level; this will be logged as a consultation only, and the Safeguarding Officer will advise of what alternative pathways and actions are required to secure the safety and welfare of the child, and potentially other children. This could be updating risk assessments, seeking advice from HR due to poor practice concern, contacting GP. The Safeguarding Team may advise that in order to be open and transparent the concern and actions taken are shared without delay to the placing authority. The Safeguarding Team will send out an email containing a summary of the concern and the recommended actions to take. This email will be copied to the relevant Area Manager and Regional Director.
- 2.6.8 The service will be responsible for making contact with all other relevant managers, consultants and key staff in Ambito (e.g. HR Consultant, Finance Department, Health and Safety Manager) to follow up the concern.

When a consultation becomes a referral

- 2.6.9 When a child has suffered or is likely to suffer harm the Safeguarding Team will advise the caller to report the concern to the host local authority in accordance with local multi-agency safeguarding children procedures.
- 2.6.10 At this point the concern will become an open referral with Ambito Safeguarding Service. The Safeguarding Team will send out an email containing a summary of the concerns, the recommended actions and confirmation of the referral status. This email will be copied to the relevant Area Manager and Operations Director. The caller will be responsible for ensuring all other key managers and consultants (e.g. HR, Regulation and Compliance Manager) are contacted to in order to follow up the concern.

In the event of professional disagreement

- 2.6.11 Where a DSA or service manager is uncomfortable with the advice and instruction being given by the Safeguarding Team (or with the Allocated Safeguarding Officer at any point of the process) this advice cannot simply be ignored. Any differences in opinion must be escalated and addressed in accordance with the Safeguarding Professional Differences Procedure.

Reporting concern with or without consent of the child

- 2.6.12 For children or young people that have an understanding of the concern and have the maturity to give consent it is good practice to discuss what actions are being taken with the child. However, regardless of whether the child has consented or not, if the concern is that a child has suffered or is likely to suffer harm there remains the duty to report the concern to the local authority.

Managing allegations against staff, considering suspension or redeployment

- 2.6.13 In Educational settings due regard must be given to, in England the statutory guidance 'Keeping Children Safe in Education (DfE, 2018) and in Wales, 'Safeguarding Children in Education: handling allegations of abuse against teachers and other staff (Welsh Government, 2014)
- 2.6.14 All allegations against staff must be notified to the Designated Officer in the local authority, in accordance with local multi-agency safeguarding children procedures.
- 2.6.15 In accordance with Ambito's Disciplinary Procedure and Suspension Procedure, all safeguarding concerns in which a Ambito employee is alleged to have caused harm must be referred to and discussed with a Human Resources Manager or Consultant. A decision must be made as to whether suspension without prejudice is required in order to safeguard the child and other children from harm. It may be appropriate to redeploy an employee if this measure eliminates risk.
- 2.6.16 At the point of suspension the employee can be informed in broad terms and what the nature of the concern is, but not specific details. This is particularly important if the allegations are a possible crime, which may lead to a full police investigation.
- 2.6.17 (See separate guidance on the '[Assessment for the Need for Suspension](#)', and Ambito's Disciplinary Procedure and Suspension Procedure for guidelines on how to support staff during a process)

When reporting / referring the concern to the Local Authority

- 2.6.18 The local authority will require detailed information about the child, the person alleged to have caused harm, and details of the concern. The local authority will want to know what actions have been taken to assess and manage risk against the child to ensure they are safe.
- 2.6.19 The local authority will want copies of body maps, disclosure records, and any other records that have already been gathered to establish if there is a concern. The Service Management are responsible for ensuring that a copy of any completed referral forms is supplied to the Allocated Safeguarding Officer and that a copy is retained on the child / young person's central and secure safeguarding file.

When to report the concern to the police

- 2.6.20 When a serious crime or robbery has just taken place then there is a duty to call the Police via 999, as an emergency situation.
- 2.6.21 With non-emergency situations, where a safeguarding concern involves a possible crime, the number 101 should be used to contact the police. The Duty Safeguarding

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Officer and/or the local authority will be able to advise on whether the police should be contacted.

Notifications to regulators

2.6.22 In England any allegation of abuse that occurs in a domiciliary regulated care setting must be notified to CQC in accordance with Regulation 18 of the Care Quality Commission (Registration) Regulations 2009. In Wales allegations of abuse in residential settings are required to be notified to CSSIW Regulation 33(1) the Children's Homes (Wales) Regulation 2002 and Schedule 6 'Matters to be monitored and reviewed by the Registered Person.' The Service Manager is responsible for liaising with Ambito's Head of Quality and/or Quality Managers for advice and guidance when a notification is required. (please see separate guidelines on notifications and sharing information with regulators)

2.6.23 The Service Management is responsible for ensuring a copy of the regulatory notification form is supplied to the Allocated Safeguarding Officer and that a copy is retained on the child / young person's central and secure safeguarding file.

Who else needs to be notified?

- **The placing authority**, if different to the host authority will also need to be notified of the concern, and of the actions that have been taken.
- The relevant **Clinical Commissioning Group** will need to be notified if Health funds the child's placement.
- **The child's parents / guardians** will need to be informed of the concern and of the actions being taken to secure the safety and welfare of their child, and who else the concern is being reported to. If the concern is about the parents / guardians, they will be told following the concern being reported to the local authority and/or Police and it is agreed that this is appropriate. It is best practice to be transparent, explaining what are the concerns and reasons, and the duty of care to report, however, the safety and welfare of the child concerned has to be of paramount importance.

2.6.24 **Do not** share the concerns with the parents/guardians if by doing so increases the risk of harm to the child or any other children, and/or the concern is about serious physical abuse or sexual abuse. In this instance seek advice prior to any discussion about the concerns with the parents/guardians.

When a concern is a whole-service concern (an allegation of institutional abuse)

2.6.25 Although safeguarding children legislation and statutory guidance does not recognise institutional / organisational abuse, Ambito recognises that a lack of leadership and poor care and support in a service, can lead to organisational abuse happening. Where

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there is a whole-service concern, before this is reported to the relevant local authority and regulator, the Duty Safeguarding Officer must discuss with the Safeguarding Manager (or their line manager if not available), to ensure that all relevant senior and executive managers are fully aware of the concern, and the need to report externally to the relevant local agencies.

2.6.26 If it comes to light at any point of the safeguarding process that this is a whole-service concern, the [protocol on escalating serious safeguarding incidents and whole-service concerns](#) must be followed.

Providing support and keeping the child central to the process

2.6.27 In the event that a child has the maturity and understanding to consent or not consent to the concern being reported to the local authority, it is important that, unless by doing so causes distress, it is explained to the child what actions have been taken so far. The child should be advised who they can approach if they have a question or need some form of support.

Step 3. Initial Enquiries – Information gathering and decision making by the Local Authority

2.7 Step 3: Initial Enquiries

2.7.1 The local authority will review the information that has been shared at the point of reporting the concerns (referral).

2.7.2 Initial enquiries may be conducted by:

- Gathering further information
- Conversation with child or representative
- Confirming causes for concern
- Applying their local authority thresholds for the most appropriate and proportionate response to the concern

2.7.3 In accordance with a local authority's thresholds for intervention how a local authority may respond to a concern has been divided into 4 main strands:

- Single-agency response
This will be when the threshold for **significant harm** has not been met, or there are early signs of abuse and neglect; it is deemed proportionate that the Service acts and deals with the concern.
- Early Help Assessment (Common Assessment Framework)
This will be when children and families may need support from a wide range of local agencies. Where a child and family would benefit from a coordinated support from more than one agency (e.g. education, health, housing, police) there should be an inter-agency assessment. These early help assessments, such as the Common Assessment Framework, should identify what help the child and family require to prevent needs, including early signs of abuse and neglect, escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.
- Statutory assessment under Section 17 (child in need)
- Strategy discussion / meeting to discuss if there is substance to the allegation or concern and to decide on the need to initiate assessment under Section 47 (child protection enquiries, when threshold of significant harm has been reached) or any other actions to safeguard

(Please see separate guidance on [‘Thresholds for Intervention’](#))

2.7.4 The Service Management is responsible for informing all key people in Ambito including their line management, the Allocated Safeguarding Officer, relevant HR consultant, of the outcome of the initial enquiry, and what level of response is required and documented on the child / young person's central and secure safeguarding file.

Step 4. The Response

2.8 Step 4: The Response

No Further Action or Single Agency Response

- 2.8.1 This is when the local authority decides that the concern does not reach the threshold for significant harm, and therefore does not require a statutory assessment. When we report a concern and inform the local authority what actions we have already taken the local authority may already be satisfied that the concern has been dealt with and that there is no further risk to the child. Or the local authority may instruct that the Service still has to deal with the concern and report back the outcomes and subsequent action plan. The Service Management is responsible for ensuring that the Allocated Safeguarding Officer, line manager and all other key managers and consultants are kept updated and informed on what the local authority requires.
- 2.8.2 This could be through implementing improvements to policy, procedures and systems for education, care and support.
- 2.8.3 Or it could be through undertaking staffing processes such as disciplinary investigations, when the concern is about an allegation against an employee or volunteer. (Please refer to Step 6, Section 47 child protection enquiries and paragraph '[when Ambito has been asked to undertake an investigation](#)') If at any point during an investigation findings indicate the child has suffered, or is likely to have suffered significant harm then the local authority must be notified without delay so they can consider convening a strategy meeting, to decide whether Section 47 enquiries are necessary.
- 2.8.4 Once the local authority has been notified of the actions taken and outcomes and once the local authority has satisfied itself that all the necessary safeguards have been or are being put in place and close the case, Service Management are responsible for ensuring that this outcome is recorded on the child's confidential file, with the detail of when, and who, including their professional title, has advised this. Wherever possible, this confirmation should be obtained in writing. Any agreed actions that Ambito is responsible for should also be recorded on the child's confidential file / care plan and implemented. (Please refer to separate guidance on '[Record Keeping](#)')
- 2.8.5 It could be that the concerns we have referred to the local authority are all about another agency and therefore it is the other agency that has to take appropriate actions. Where the local authority has confirmed there is no further action for Ambito to take, this is recorded on the child's confidential file. At this point the case can progress to closure.
- 2.8.6 Please go to Step 8 'closure discussion'

The response – Early Help Assessment

- 2.8.7 This level of response is unlikely to be applicable to children and young people already with high care and support needs due to their level of disability, as they are more likely to already be provided with support as a ‘child in need’ in accordance with Section 17 of the Children Act 1989.
- 2.8.8 An early help assessment is when the local authority decides that the concern does not reach the threshold for significant harm, and therefore does not require a statutory assessment. The local authority may instead instruct that an Early Help Assessment is required because the child and family would benefit from coordinated support from more than one agency (e.g. education, health, housing, police). The Service Management is responsible for ensuring that the Allocated Safeguarding Officer, line manager and all other key managers and consultants are kept updated and informed on what the local authority requires.
- 2.8.9 Early help means providing support as soon as a problem (including early signs of abuse and neglect) emerges. These early help assessments, such as the Common Assessment Framework (CAF), should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989 (see separate guidance on thresholds of intervention for Children’s Social Care).
- 2.8.10 As part of local multi-agency safeguarding arrangements there will be processes in place for the assessment of children who may benefit from early help. Service Management may be asked to be the ‘lead professional’ undertaking the early help assessment (CAF) or may be asked to contribute to the process and to possible meetings e.g. ‘Team around the Child/Family (TAC/F)’ meetings as part of early help assessment and provision.
- 2.8.11 The assessment should be undertaken with the agreement of the child and their parents or carers. It should involve the child and family as well as all the professionals who are working with them. If parents and/or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral into local authority children’s social care may be necessary. The Allocated Safeguarding Officer will be able to advise on this.
- 2.8.12 Once early help provision is in place, and all agencies are satisfied that risks are being managed Service Management are responsible for ensuring that this is recorded on the child’s confidential file, with the details of when, and who, including their professional titles, has agreed this. Wherever possible, this confirmation should be obtained in writing. Any agreed actions that Ambito is responsible for should also be recorded on the child’s confidential file / care plan and implemented. (Please refer to Guidance on Safeguarding Concerns and Record Keeping)

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2.8.13 Please go to Step 8 'closure discussion'.

2.8.14 If at any time during an early help assessment (or when early help provision is in place) there is a concern that a child has suffered or is likely to suffer significant harm, then within one working day of the concern being raised there must be a discussion with Ambito Safeguarding Service and a referral should be made immediately to the local authority so they can consider convening a strategy meeting, to decide whether Section 47 enquiries are necessary.

The response – Statutory Assessment under Section 17 (Child in Need)

2.8.15 This is when the local authority decides that the concern does not reach the threshold for significant harm but the child is most likely a 'child in need' and requires an assessment under Section 17 of the Children Act 1989. The majority (but not all) children that Ambito provide a service to have complex and multiple disabilities, which therefore will result in, at the very least, a response at this level. A social worker should lead this multi-agency assessment, which should be completed within 45 days of the referral being accepted by the local authority. Service Management must contribute to the assessment as requested by the social worker. The child and family's needs and wishes must be reflected within the assessment. The Service Management is responsible for ensuring that the Allocated Safeguarding Officer, line manager and all other key managers and consultants are kept updated and informed on what the local authority requires.

2.8.16 The assessment may result in the social worker deciding no further involvement from the Local Authority Children's Social Care is required, but may refer to another agency for an early help assessment.

2.8.17 Where the outcome of the Section 17 assessment is to provide statutory services, a multi-agency Child in need Plan should be developed which sets out which agencies will provide which services to the child and family. When this Child in Need Plan includes a Ambito service, Service Management must ensure that this is documented on the child's confidential file.

2.8.18 Where the Child in Need Plan includes the Ambito service and is a 'high end' plan where concerns are at the cusp of significant harm (this should be discussed with the social worker and the Allocated Safeguarding Officer) the case will remain as an open referral with Ambito Safeguarding Service until Ambito is no longer named on the plan and/or when the risk of significant harm is removed.

2.8.19 Where information gathered during an assessment results in the social worker suspecting that the child is suffering or likely to suffer significant harm, the local authority should hold a strategy discussion to enable it to decide, with other agencies, whether to initiate enquiries under section 47 of the Children Act 1989. Service Management may be required to be part of this discussion / attend a strategy discussion. (See [Step 5](#) of this procedure) Service management must ensure they

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inform all key managers and consultants in Ambito, including the Allocated Safeguarding Officer of this development.

2.8.20 Where the social worker is satisfied that risks to the child are now being managed through the Child in Need plan, Service Management are responsible for ensuring that this outcome is recorded on the child's confidential file, with the detail of when, and who, including their professional title, has advised this. Wherever possible, this confirmation should be obtained in writing. Any outstanding actions that Ambito is responsible for, outside of the Child in Need Plan, should also be recorded on the child's confidential file / care plan and implemented.

2.8.21 Where the Local Authority has taken the decision to keep the child subject to a child in need plan due to the child's level of disability but risks are now being appropriately managed please go to Step 8 'closure discussion'.

The Response- Section 47 Enquiries

2.8.22 A section 47 enquiry is initiated to decide whether and what type of action is required to safeguard and promote the welfare of a child who is suspected of, or likely to be, suffering significant harm. It is carried out by undertaking an investigation; local authority social workers have a statutory duty to lead this, at times in conjunction with the police, in accordance with Section 47 of the Children Act 1989. A strategy meeting or discussion will be convened first to establish whether a section 47 response is required. The investigation should be concluded within 15 working days of the strategy discussion, though local policy may dictate a tighter framework. If deemed necessary, the investigation will form the basis of information provided at a multi-agency child protection conference, (see step 7). All relevant agencies and professionals (including Ambito Service Management) are required to help the local authority in undertaking its enquiries. (See Step 5 below)

Step 5 Strategy Meeting

2.9 Step 5: Strategy Meeting

2.9.1 The Local Authority Children's Social Care will convene a strategy discussion to determine the child's welfare and plan rapid future action if there is reasonable cause to suspect the child is suffering, or is likely to suffer, significant harm. Where Ambito has reported the concern or when a serious concern involves a child that we provide a service to the Service Management will very likely be invited to attend a strategy meeting. It is important that the person representing Ambito is sufficiently senior to make decisions on behalf of the service. The Service Management is responsible for ensuring that the Allocated Safeguarding Officer, line manager and all other key managers and consultants are kept updated and informed on what the local authority requires.

2.9.2 Where a service is not aware of concerns relating to a child they provide support to, but then receive an invitation to a strategy meeting the Service Management must notify their line manager and the Duty Safeguarding Officer within one working day. This will then be opened as a referral to Ambito Safeguarding Team so that further actions can be tracked.

2.9.3 The purpose of the strategy discussion is for agencies to:

- share available information;
- agree the conduct and timing of any criminal investigation; and
- decide whether enquiries under section 47 of the Children Act 1989 should be undertaken.

Step 6 Statutory Section 47 Enquiries

2.10 Step 6: Statutory Section 47 Enquiries

When police undertake a criminal investigation

2.10.1 The strategy meeting will agree the conduct and timing of any criminal investigation. The police investigation will take precedence over any other enquiries. If the police investigation is regarding an allegation against an employee, unless that employee has admitted to the offence, normal practice is to **not** commence an internal investigation until the criminal justice process has ended. This is so to avoid contaminating police evidence. In **exceptional** cases however, when there is a significant delay in the police completing their investigations and the case going to court, in consultation with HR and the Allocated Safeguarding Officer consideration will be given on whether the police and the local authority are approached about Ambito undertaking a parallel disciplinary investigation into the concerns.

When a Section 47 enquiry relates to a Ambito employee

2.10.2 When a concern is about a Ambito employee or volunteer, and it is suspected that the child has suffered, or likely to suffer significant harm then the local authority may also convene Section 47 enquiries. The local authority may have a specific protocol for dealing with these types of enquiries and a Designated Officer will be involved. Decisions will be made at the strategy meeting on whether a parallel disciplinary investigation can take place while the Section 47 enquiries are underway.

2.10.3 If this is not agreed, it is recommended that where their enquiries involve allegations against Ambito employees a discussion takes place with the local authority and Designated Officer about joint interviews to avoid undertaking further disciplinary interviews at a later stage and duplicating process.

When Ambito has been authorised to undertake an investigation during Section 47 enquiries or when a single-agency response has been advised due to level of significant harm not being met

2.10.4 The Service Management are responsible for ensuring line managers, the Allocated Safeguarding Officer and all other key people have been informed of this, so that a Terms of Reference can be drawn up. This decision should be confirmed in writing, however where this is not possible then a clear written record must be made of when and who was spoken with, their professional title and what they advised. The investigation will be carried out in accordance with this procedure, and Ambito's Disciplinary Procedure. This will avoid duplication of process, and will mean that the case can go to a Disciplinary Hearing if there are facts established that support a reasonable belief that the allegation has happened.

Devising a Terms of Reference

2.10.5 The Terms of Reference is commissioned by the Area Manager. The Service Manager, unless implicated in the concern, will usually draft the Terms of Reference, as they will have knowledge / background to the concern, and knowledge of the support needs of the child and person alleged to have caused harm. The Service Manager must use the Terms of Reference template to do this (See Ambito's Disciplinary Policy and Procedure).

2.10.6 The first draft is then shared with the following key people:-

- Allocated Safeguarding Officer
- Safeguarding Manager
- Area Manager
- Regional Director
- HR Manager / Consultant
- Any other key person that can support the planning stage and enquiry e.g. Health and Safety Manager, Quality Manager, Audit Department

2.10.7 All the above people have responsibilities in ensuring the Terms of Reference clearly identifies the concerns, and what the specific issues are to be addressed. This should include questions that focus on the actions of the person that has or may have caused harm, questions that focus on systems and practice in the Service, in order to identify service improvements, and what other actions are necessary to ensure the safety and welfare of the child (children) concerned. Once all the above people have suggested amendments and additions then a final version can be agreed, then signed off by the Regional Director. **From the point of confirmation by the local authority that Ambito will investigate, a Terms of Reference should be signed off by the commissioning Area Manager or Operational Director within 5 working days.**

Identifying an Investigating Officer

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2.10.8 The Area Manager (with support of the Regional Director when required) will identify an Investigating Officer. To be certain that an objective investigation will be carried out the Investigation Officer should not be linked to the Service. This person must also be trained in conducting safeguarding investigations, and wherever possible, have experience and skills specific to the nature of the concern.

2.10.9 A note taker should also be identified for the investigation and in cases of complex investigations two Investigation Officers is best practice. A Safeguarding Officer may investigate under the following criteria:-

- Where the allegation is about Organisational abuse / a whole-service concern and/or
- Where the allegation is about sexual abuse or serious physical abuse
- Where the threshold of significant harm has been reached and the investigation is being conducted parallel with the local authority's section 47 enquiries
- When the Service Manager is implicated

The Investigation

2.10.10 The Investigating Officer alongside the Service Management will be responsible for ensuring that where an older child has the competency and maturity to understand the concerns and what has happened to them, then their wishes regarding their involvement and contribution to the investigation must be obtained and considered. Consideration must also be given on whether the child has already been interviewed by a social worker or as part of a police process. Where interviews have been undertaken by other agencies it must be considered whether it is necessary to re-interview, considering whether the information required can be obtained from minutes from the Police/ local authority interviews. It must also be considered the emotional impact of interviewing for the child and whether this information is integral to the investigation.

2.10.11 When a Ambito Safeguarding Officer is not investigating the concern, the Allocated Safeguarding Officer will offer guidance and support throughout and oversee the investigation process. This support will include (but not be limited to) investigation and interview planning, analysis of findings and the writing of the report.

Teleconference after the Investigation (chaired by Regional Director / Area Manager)

2.10.12 When an investigation report has been written a teleconference is convened to discuss the outcomes of the investigation and next steps. The teleconference is usually arranged by the Regional Coordinator, on behalf of the Regional Director.

2.10.13 Key people, including the Allocated Safeguarding Officer, Service Management, Area Manager and HR Consultant should attend the teleconference.

2.10.14 The purpose of the teleconference is to discuss the following:-

- Investigating officer's feedback
- The report- group feedback on any factual inaccuracies / necessary amendments
- Staff member subject to allegations- is there a case to answer?

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- Additional findings?
- Recommendations and action plan, agree timescales
- How will the outcomes of investigation and report be shared with the local authority?
- How will the outcomes of investigation and report be shared with the child and/or his representative?

2.10.15 For the purpose of an audit trail, the Allocated Safeguarding Officer will write a summary of the teleconference, send out to all attendees by email and save to the open referral on the safeguarding database.

2.10.16 Following agreement at the teleconference the report and other documentation relevant to the concern will be shared with the local authority.

Disciplinary hearing

2.10.17 The investigator will identify whether there are findings to support a reasonable belief that the allegation of abuse has happened; that there is a case to answer to. Where this is the case a disciplinary hearing will most likely be convened. (Refer to Ambito Disciplinary Procedure for further guidelines).

DBS referral

2.10.18 If following a Disciplinary Hearing the employee is dismissed (or in cases where the employee has resigned before a hearing, and the findings of the investigation would have most likely resulted in dismissal) and the employee works in regulated activity (see DBS guidance) and the harm test is satisfied then we have a duty to refer to the Disclosure and Barring Service.

2.10.19 The Service Manager will complete the DBS referral form, then send on to the Area Manager / Principal, HR and Operational Director for checking. The DBS referral is then sent to Disclosure and Barring Service. The Allocated Safeguarding Officer will also require a copy of the form to add to the Safeguarding Database. (Please follow Ambito Procedure for DBS referral)

2.10.20 The employee's professional association will also need to be notified.

The Designated Officer for the Local Authority

2.10.21 The Designated Officer must be kept informed of developments and progress with the investigation including the outcomes of any disciplinary hearing and whether a DBS referral has been made. When the concern is also being dealt with as a Section 47 enquiry the social worker leading the case must also be kept informed throughout.

Where concerns of significant harm are not substantiated

- 2.10.22 If, following a section 47 enquiry, concerns of significant harm are not substantiated then the Local Authority Social Worker may decide not to convene a Child Protection conference. Instead, the case will be discussed with the child, family and professionals, including the Service Management to determine whether support from any other services may be helpful and help secure it; and to consider whether the child's health and development should be re-assessed regularly, in accordance with Section 17, and a Child in Need plan put in place. (See [Step 4 Response- Multi-agency assessment via Section 17 Children Act 1989](#)) for process to then be followed)
- 2.10.23 Where an investigation has been undertaken by Ambito, into allegations against an employee or volunteer, it is the responsibility of the Service Management to ensure feedback on the outcomes of the investigation and of any learning is fed back to the child and family.

Step 7. Child Protection Conference, Core Groups and the Protection Plan

Step 7: Child Protection Conference

- 2.10.24 Where concerns of significant harm are substantiated and the child is judged to be suffering, or likely to suffer, significant harm then the local authority social worker will convene an initial Child Protection conference. The purpose of the conference is to bring together and analyse, in an inter-agency setting, all relevant information and plan how best to safeguard and promote the welfare of the child. It is the responsibility of the conference to make recommendations on how agencies work together to safeguard the child in future. If invited to the conference the Service Manager or Area Manager will be required to contribute to this process and work with fellow agencies and professionals on how to safeguard the child from harm in the future, taking timely, effective action according to the plan agreed. Where a Ambito investigation has taken place into allegations against an employee or volunteer the service manager and area manager will be required to feed back to the conference the findings of the investigation and what actions have been put in place to secure the child's safety and to improve practice in the service.
- 2.10.25 Conference tasks include, identifying membership of the core group of professionals and family members who will develop and implement the child protection plan; establishing timescales for meetings of the core group, production of a Child Protection plan and for Child Protection review meetings; and agreeing an outline Child Protection plan, with clear actions and timescales, including a clear sense of how much improvement is needed, by when, so that success can be judged clearly.

The child protection plan, core group meetings and review conferences

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- 2.10.26 If the service is named on the Child Protection plan and/or part of the identified core group, then the case will remain open with the Safeguarding Service, while the risk of significant harm continues / the child protection plan remains in place.
- 2.10.27 When a service is made aware that a child it has just started to support is subject to a Child Protection plan the Service Management must call the Ambito Safeguarding Service via the duty number **by one working day**. If the service provided is not a one-off but ongoing and provides 2 hours or more support per week, then the case will be opened as a referral to Ambito Safeguarding Team and allocated to a Safeguarding Officer. This is so that expert advice can be offered on the service's role and responsibilities within the protection plan, and how to present and contribute at conference meetings and core groups.
- 2.10.28 The Service Management are responsible for ensuring that their line management and the Allocated Safeguarding Officer is kept up to date with progress and when child protection conferences and core group meetings are taking place. All copies of minutes and other relevant documentation must be supplied to the Allocated Safeguarding Officer on a regular basis.
- 2.10.29 Only when a local authority and the Child Protection conference members agree that there is no longer risk of significant harm (and the child is removed from a Child Protection plan) can consideration be given to closing the case. Where there are still some risks, that it is felt can be managed via a Child in Need plan some discussion with the Allocated Safeguarding Officer will be required on whether the case should still remain open.
- 2.10.30 The only exception to the above is when the child has left the Ambito service, and therefore is no longer in the care of Ambito. In this instance, and there are no concerns relating to the care and support Ambito has provided, the case can be closed.

Step 8. Case Closure

2.11 Case Closure

- 2.11.1 This end process can happen at any of the steps of the process as long as the local authority are satisfied that there is no further risk of significant harm to the child or that risks are being appropriately assessed and managed.
- 2.11.2 Service Management must aim to get the local authority to confirm closure of case in writing. If not, then a detailed record must be made of when, and who was spoken with, including their professional title and what was advised. Service Management must ensure that all documentation relevant to the case, including regulatory notification form, local authority referral form (for reporting the concern), meeting minute records, terms of reference, investigation report, completed action plan, has been forwarded to the Allocated Safeguarding Officer.

Closure discussion

- 2.11.3 Once Service Management is confident that the case has been closed by the local authority and that all the relevant documentation has been forwarded to the Allocated Safeguarding Officer then in order for the case to be closed Service Management must request a closure discussion.
- 2.11.4 In cases where the safeguarding response has ended at a straightforward single-agency response, or early help assessment, this discussion can take place between the Allocated Safeguarding Officer and Service Management. When the safeguarding response has been considered complex or when a Section 47 enquiry has been required, a teleconference can be convened, so that all key people involved in the concern e.g. Area Manager, HR Consultant, Regional Director, Investigating Officer are included. The Closure Discussion will address the following (but is not limited to):-
- Has the child and/or family received feedback on the outcomes of the process?
 - If not, why not and what further actions are necessary to achieve this?
 - If an employee or volunteer has been dismissed as a result of the concern, has a DBS referral, if appropriate been completed?
 - If measures have been recommended against the employee, have those measures been put in place?
 - Has the action plan into service improvements been completed?
 - If not, what is outstanding and how will these improvements be achieved?
 - Are there any further risks to the child and to and other children or adults at risk?
 - If so, what further actions are required?
- 2.11.5 Once this discussion has taken place and all people involved in the Closure Discussion are satisfied that the concern has been appropriately dealt with, and that there is no further risk of harm to the child and any other children the Allocated Safeguarding Officer will complete a closure record, summarising the discussion then refer this to the Safeguarding Manager for sign off.

2.11.6 Once the Safeguarding Manager has signed off the case, the closure record is then forwarded to Service Management confirming closure of the case.

2.12 Progress reports and updates for an open referral –

2.12.1 For an ongoing open referral or a case where there are delays e.g. there has been a criminal investigation and the case is now waiting to go to court or where a disciplinary hearing has resulted in an ongoing appeal situation, it is imperative that the Service Management keeps the Allocated Safeguarding Officer and all other key people informed of any developments, and reasons for any delay in progress. Regular case discussion should take place and where there is little progress **bi-monthly case discussion** is the required minimum between the Service Management and the Allocated Safeguarding Officer. This discussion should include, but not be limited to what actions are outstanding and is the child / family and staff member subject to the allegations aware of the delay?

2.13 When a concern has media interest / reputational risk / financial risk

2.13.1 The [protocol for the escalation of serious incidents](#) must be followed in all cases where there is media interest / reputational risk and financial risk.

2.14 When the concern is via Ambito Helpline / one-off support e.g. Ambito Response

2.14.1 The procedure for raising and reporting concerns is still applicable. If, however contact is one-off and no further Ambito service is on offer to the child and family, once the local authority has provided feedback on how they are following up the concern this is then shared with the Allocated Safeguarding Officer Case who will then close the referral on Ambito's database as No Further Action required.

2.15 Medication Errors

2.15.1 See diagram 3 for the flowchart for responding to medication errors.

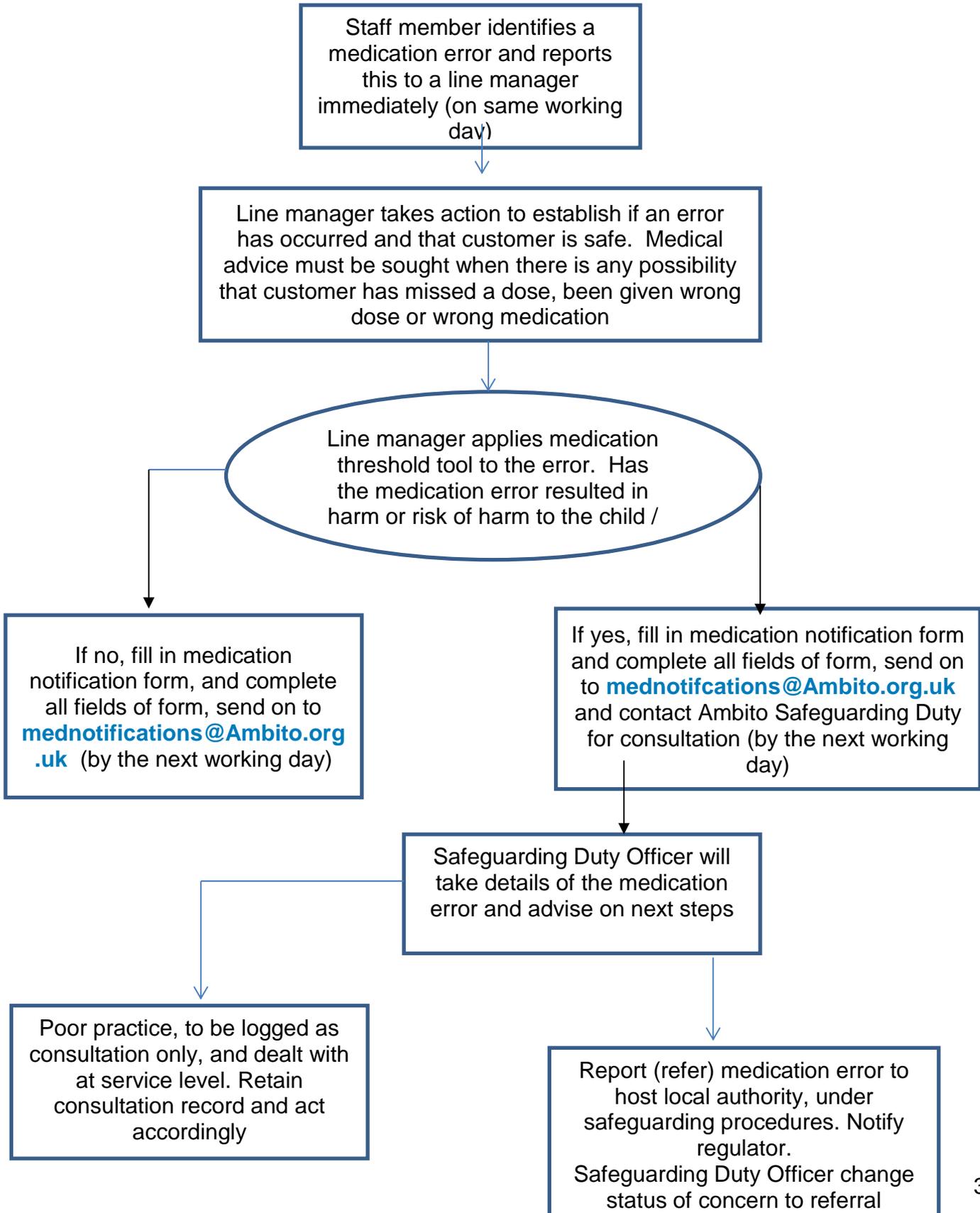
2.15.2 All services that provide support to customers with the safe storage and administration of medicines must do so, in accordance with Ambito's Medication Policy and Procedure. Where errors and omissions have occurred then these must be notified via **mednotifications@Ambito.org.uk** within 1 working day.

2.15.3 The Ambito Duty Safeguarding Officer screens all medication errors then records these on Ambito's Safeguarding Database. All fields on the notification form must be completed otherwise the form will be returned to the Service for further information. The Duty Safeguarding Officer will check the information on the form to ensure that appropriate actions have been taken in response to the error, and that all risks have been assessed and managed.

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- 2.15.4 Prior to the completion of the notification form Service Management are required to refer to the medication error threshold tool and consideration log. If harm has been caused to a child due to a medication error, in addition to the completion of the notification form a consultation call to Safeguarding Service via the Safeguarding Duty number is also required.
- 2.15.5 In cases where through the screening of a notification form the Duty Safeguarding Officer is concerned about the level of risk at a service and/or the risk of harm to that customer the Duty Safeguarding Officer will seek further information from the Service Management.

2.16 Diagram 3: Medication Error Flow Chart



3 Areas of Responsibility

3.3 Chief Executive Officer (CEO) and Executive Board

- 3.3.1 Ensure that effective safeguarding policies and practices are approved, implemented and monitored throughout Ambito. Take steps to ensure that any safeguarding risks arising from Ambito's activities and operations involving children and adults at risk are assessed and measures are put in place to reduce these risks to acceptable levels.
- 3.3.2 Ensure that Ambito has appropriate and effective safeguarding policies and procedures in place and that the Executive Leadership Team is able to implement fully the Corporate Safeguarding Policy across all areas of Ambito's work.
- 3.3.3 Ensure that the Board are immediately advised of any major causes of safeguarding concern. Ensure that the Executive Leadership Team routinely evaluates the quality and impact of Ambito's safeguarding activities, ensuring transparency and a learning culture across the organisation in securing any improvements to safeguarding policies, procedures and practices.

3.4 Operational Directors:

- 3.4.1 Development and effective implementation of Ambito's Corporate Safeguarding Policy based on national guidance and recognised best practice.
- 3.4.2 Ensure that the Chief Executive are immediately advised of any major causes of safeguarding concern. Delivery of effective corporate governance arrangements for safeguarding, primarily in the form of regular, relevant and rigorous reports about the quality, consistency and effectiveness of safeguarding practice across all of Ambito's operations. Appropriate resourcing of safeguarding support and training throughout Ambito. Establish appropriate risk management strategies in relation to children and adults at risk throughout Ambito's Services.

3.5 School and College Governors

- 3.5.1 Establish safeguarding as a standing item at each Governor's meeting and ensure that the Head Teacher/Principal provides routine reports on any reported Safeguarding issues. Ensure that the requirements of the Corporate Safeguarding Policy and Procedures are being met. Ensure that any safeguarding action plans arising from Ofsted/CIW/CQC inspections findings and recommendations are discussed in advance of approval with the Head of Quality and thereafter submitted to the Operational Director.

3.6 Ambito Directors and Area Managers:

- 3.6.1 Oversee effective delivery, management and monitoring of safeguarding within their area of responsibility and promote best practice throughout Ambito.
- 3.6.2 Ensure availability of resources to ensure the implementation of this policy, completion of training and systems to ratify, communicate and review this policy.
- 3.6.3 Ensure there are clear disciplinary and other measures for staff who do not adhere to this policy.

3.7 Head of Quality and Safeguarding:

- 3.7.1 Ensure Ambito's corporate safeguarding practices, training and procedures comply with national legislation and guidance.
- 3.7.2 Ensure that the Operational Director/Director of Quality/Chief Executive is immediately advised of any major causes of safeguarding concern.
- 3.7.3 Lead the annual programme of safeguarding audits
- 3.7.4 Ensure the development and delivering of safeguarding training across of Ambito's areas of work is high quality and up to date.
- 3.7.5 Manage and develop Ambito's Safeguarding Service and ensure the delivery of high quality, legally sound advice and guidance by the Safeguarding Officers.
- 3.7.6 Ensure the policy is monitored and organisational learning is enabled by systems of data collection and analysis as appropriate.

3.8 Safeguarding Officers:

- 3.8.1 Ensure all appropriate steps are taken in cases that have been referred to the Safeguarding Service. Ensure the safeguarding procedures are followed. Ensure advice, guidance and training is provided consistently and supports the full implementation of the policy and associated procedures.

3.9 Service Managers & Designated Safeguarding Advisers (DSAs):

- 3.9.1 With reference to the Safeguarding Competency Framework ensure all staff and volunteers within their Service have the relevant competencies in safeguarding, in particular being aware of how to identify and respond to concerns and/or allegations of abuse and neglect. Ensure that staff and volunteers in their Service receive annual safeguarding training. Ensure the Local Authority Safeguarding Children and Young People procedure and Ambito's Safeguarding Children and Young People procedure are accessible to all staff members and volunteers. Ensure their Local Multi-Agency Safeguarding Children and Young People procedure and Ambito's Safeguarding Children and Young People procedures are accessible to all staff members and volunteers.
- 3.9.2 Responsible for ensuring their Local Authority out of hours, and the relevant regulator's contact details, and the Ambito on-call managers contact details are available to staff and volunteers within the Service at all times. And that all staff and volunteers have contact details for line managers and the Speak Up number. (See separate guidance on 'Role and Responsibilities of the DSA')
- 3.9.3 Responsible for own learning and development in accordance with Safeguarding Competency Framework. Use the resources available to meet development needs including undertaking safeguarding training provided by the local authority and other safeguarding partners (such as LSCBs, Police, Health organisation) where this is offered and/or is a requirement in accordance with local contract and commissioning arrangements.

3.10 Individual Staff and Volunteers:

3.10.1 Ensure concerns regarding the safety and wellbeing of a child or young person are raised with their line manager immediately or without delay. Identify and take steps to safeguard and protect children and adults at risk when concerns arise. Take responsibility for learning in safeguarding, to contribute to discussions about this policy and safeguarding in general.

3.11 Other departments:

3.11.1 Recognise that safeguarding is everybody's responsibility and follows this policy and procedure if they have reasonable cause to believe that a child or adult at risk is being harmed or is at risk of harm from abuse and/or neglect.

4 Learning and Development

- 4.3** Ambito is committed to ensuring that all staff and volunteers know what is expected of them regarding their safeguarding responsibilities so that customers are safe and appropriately supported. Ambito's Safeguarding Competency Framework must be used to identify and meet any training or development needs with staff. Staff should speak to their line manager in relation to their learning needs using supervision and the Performance and Development Process (PDP). (Please see separate document Ambito Safeguarding Training Strategy on training requirements and details on other courses and workshops available)
- 4.4** The Safeguarding Service train all Designated Safeguarding Advisors (DSA) on how to fulfill the role of DSA, this includes providing them with up to date knowledge on the legal context, best practice in safeguarding, as well as how to apply this procedure when there are concerns. The Safeguarding Service offer ongoing support to enable DSAs to continually develop their skills and knowledge as well as provide formal updates training to DSAs every three years (every two years for DSAs in Educational settings). The requirements regarding Ambito DSA training for DSAs in educational settings is currently being reviewed to take into account the requirement that training provided by local authorities is also attended.
- 4.5** All new staff and volunteers must attend the online E-Learning course provided by eLfY as part of their induction and within the first six months of their employment.
- 4.6** All staff within schools must also read Part 1 and Annex A of Keeping Children Safe in Education (2018).
- 4.7** There is an expectation that DSAs and Service Managers are responsible for providing at the very minimum annual safeguarding refresher training to all staff and volunteers within their service. An in-house four-hour training module has been developed by Ambito Safeguarding Service and is available on InAmbito for DSAs and Service Managers to use. The Safeguarding Link Worker for each region will support services in

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the delivery of the refresher training where this is identified by the Regional Management Team as a priority need. There are also additional modules and refresher training available through Virtual College.

- 4.8** Ambito encourages continual and ongoing learning and development in safeguarding; this can be achieved through discussion in team meetings and supervision. This helps embed safeguarding in day to day practice and develop an open, learning culture. The Safeguarding Service also offers short refresher modules and other resources to be used for this purpose if necessary.
- 4.9** Services must also look at what their Local Authority offers in respect of Safeguarding training and ensure they fulfil any requirements set out in their contract and commissioning arrangements.

5 Supporting Guidance and Additional Resources

5.3 Guidance Documents

There is separate mandatory guidance to help operationalise this procedure:

- G1. Making Safeguarding Personal
- G2. Physical Restrictive Interventions
- G3. Role and responsibilities of Designated Safeguarding Advisor
- G4. Guidance on the assessment for the need for suspension
- G5. Medication thresholds tool and consideration log
- G6. Record Keeping
- G7. What is information gathering?
- G8. Preserving or Protecting Evidence
- G9. Tackling Extremism and Radicalisation Guidelines

- GC1. Categories of Child Abuse and Signs and Indicators
- GC2. Other Issues that Interface with Child Abuse
- GC3. How to respond to a disclosure
- GC4. Child Sexual Exploitation Ambito Guidelines
- GC5. Sharing information and safeguarding children
- GC6. E-safety Guidelines
- GC7. Female Genital Mutilation
- GC8. Peer on peer abuse
- GC7. Thresholds for Intervention for Children's Social Care

Missing Persons including children missing from home, care and education
Ambito Safeguarding Competency Framework
Ambito Safeguarding Training Strategy

5.4 Links to other Ambito policies and procedures

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- Confidentiality
- Deprivation of Liberty
- Disciplinary
- Suspension
- Recruitment and Selection (for policy on safer recruitment)
- Mental Capacity Act
- Customers Finances
- Personalisation and self-directed support
- Privacy and Dignity
- Restricted Practice
- Ambito Code of Conduct and Behaviour Framework
- Safeguarding Adults
- Sexuality and Personal Relationships
- Speak up (whistleblowing)

This is not exhaustive.

5.5 Glossary of Terms

- 5.5.1 **Allocated Safeguarding Officer** – the Safeguarding Officer that has been allocated the open referral and is holding the case, this is when a safeguarding process is being followed and Ambito’s Safeguarding Service provides advice and guidance throughout.
- 5.5.2 **Concern-** this term is used for all information that is initially reported to the Ambito Safeguarding Team, this could be a medication error, a consultation due to poor practice, or a concern that leads to an open referral because there is an allegation of abuse.
- 5.5.3 **Consideration Log-** a decision making tool to support service management in making a professional judgement on whether a medication error also warrants a call to Ambito Safeguarding Service or to their local safeguarding authority, in addition to reporting the concern on the medication error reporting form.
- 5.5.4 **Duty Safeguarding Officer** – the Safeguarding Officer on duty for that day, the person responsible for responding to concerns.
- 5.5.5 **Medication error-** there has been a mistake, omission, or inaccuracy in the administration or storage of a customer’s medication.
- 5.5.6 **Medication threshold tool-** a management tool to determine the level of risk to a customer as a result of a medication error
- 5.5.7 **Open referral** – this is when a concern reported to Ambito Safeguarding Service is reported to the relevant local authority. Some open referrals will be immediately closed, when a local authority feels that there is not an allegation of abuse or the safeguarding

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concern has already been resolved, when other referrals will remain open while risk management actions or a Section 42 Formal Enquiry is undertaken.

- 5.5.8 **Raising a concern** – this is when any member of staff or volunteer in Ambito has a concern and raises this concern with their manager. This is a duty of care under this procedure.
- 5.5.9 **Reporting a concern** – this is also known as the referral. This is when the manager / DSA of the service notifies line management and reports the concern to Ambito Safeguarding Service, this could then result in a referral to the Local Authority.
- 5.5.10 **Ambito Safeguarding Officer** – this is the individual members of Ambito’s Safeguarding Team
- 5.5.11 **Ambito Safeguarding Service** – the Safeguarding Team, consisting of Safeguarding Officers and the Safeguarding Manager; all are registered social workers.
- 5.5.12 **Service Management** – includes DSA’s, Team Leaders, Coordinators and the Service Manager
- 5.5.13 **Whole service concern** – replaces the term ‘whole service alert’. A service in which there is evidence of persisting major concerns on the basis of compliance or safeguarding customers which impact so severely that customers cannot be protected against the abuse or receive an acceptable quality of care

The Safeguarding Service can be contacted for further information that relates to this procedure, see Appendix 5 for contact details

6 Appendices

- 6.3 **Safeguarding Consultation and Referral Checklist**
- 6.4 **Open Referral Checklist and Tracking Sheet (CYP)**
- 6.5 **Closure Discussion Checklist**
- 6.6 **Body Map**
- 6.7 **Safeguarding Contacts**
- 6.8 **Safeguarding Duty Number Poster**

Document Control

Who has agreed the initial purpose and Scope of the new policy/procedure together with the process to be used for technical review and stakeholder consultation?	Director of Quality
Technical review carried out - Who? When?	Safeguarding Manager Sep-Oct 2015
Stakeholder consultation carried out – Who? When?	Safeguarding Officers Sept-Oct 2015 Anthony Collins Solicitors
Final quality check carried out – Who? When?	Planning Performance and Policy Manager, Dec 15
Policy/procedure signed off – Who? When?	Board of Trustees, February 2016
When was this policy and procedure issued?	April 2016
What is the version number?	1.2
What is the date of the next review? (Maximum of two years from last approval date)	December 2017-Reviewed, no significant changes January 2019-New Review due
Which department does this policy and procedure originate from?	Services
What is the job title of the lead manager?	Safeguarding Manager
Who is the author/contact person, including their job title (if different from above)?	-

Change Record Form

Version	Date of change	Date of release	Changed by	Reason for change
1.0	1 January 2016	1 April 2016	JK	New policy. Significant updates and changes made.
1.1.	1 May 2016	1 May 2016	NR	Minor changes formatting following release of policy.
1.2.	19 December 2016	3 January 2016	JK / NR	Minor changes following six-month review: <ul style="list-style-type: none"> • Changes to responsibilities following Quality team restructure • Addition of medication error consideration log to the glossary of terms in the procedure. • Update to Appendix 5: Safeguarding Contacts
1.3	10 January 2018	10 January 2018	JK / NR / ND	Minor changes and additions to body of text <ul style="list-style-type: none"> • More references to Keeping Children Safe in Education • Incorporation of relevant Welsh legislation and guidance • Additional statements included on Female Genital Mutilation, Peer on Peer abuse and children missing from home, care or education, with new associated guidance being introduced • New paragraph 1.2.11 in Policy on record keeping and a new emphasis on the need to retain documents and communication logs on the relevant child / young person's central and secure safeguarding file. • Paragraph 2.3.3 'reasonable ground to believe' changed to 'reasonable cause to suspect' • Paragraph 2.3.11 now includes statement 'anyone can make a referral to Children's Social Care. So that the appropriate managers and senior leadership teams

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				<p>can fulfil their responsibilities in safeguarding it is best and Ambito procedure...'</p> <ul style="list-style-type: none"> • A new paragraph 2.3.12 under stage 1 raising a concern on 'outside normal office hours' • Step 2 Word raising replaced with reporting • Reference to Professional Differences Procedure in the event service management do not agree with the advice of the Duty or Allocated Safeguarding Officer • Paragraph 2.6.22 on Section 47 enquiries timescales amended for accuracy • Sections 3 and 4 now include references to Safeguarding Training Strategy and Safeguarding Competency Framework • Greater emphasis on accessing local authority / Local Safeguarding Children Board (LSCB) training in particular Designated Safeguarding Advisors in Educational settings • Restricted Practice, Ambito Code of Conduct and Behaviour Framework and Safeguarding Adults Policy and Procedure referred to in Section 5 Links to Other Policies • Timescale 'within one working day' changed to 'by one working day' throughout document
1.4	21 August 2018	1 September 2018	NR	<p>Updates for new Keeping Children Safe in Education (2018).</p> <ul style="list-style-type: none"> • Add in requirement for local policy in schools • Add in paragraph about contextual safeguarding • Additional bullet under 1.3.9. • Update references to Keeping children safe in education legislation and Working together to Safeguard Children (2018) • Addition of need for school safe to read relevant sections of Keeping Children Safe in Education. • Change reference to LSCBs to Safeguarding Partners.

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