Safeguarding Policy

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Important contacts

JEREMIAH'S JOURNEY	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Corinne Picton	corinne@jeremiahsjourney.org.uk
Chief Executive Officer (CEO)	Tanya Woodland	tanya@jeremiahsjourney.org.uk
Local authority designated officer (LADO)	LADO@plymouth.gov.uk	01752 306340 or email LADO@plymouth.gov.uk
Safeguarding Trustee	Helen Taylor	Helen@jeremiahsjourney.org.uk

Executive Summary:

Our Commitments

We will:

- Treat all children and young people with respect.
- Listen to and take concerns seriously.
- Provide a safe environment.
- Follow safeguarding procedures.
- Share concerns promptly with appropriate agencies.
- Keep accurate and secure records.
- Train staff and volunteers regularly.
- Recruit staff and volunteers safely.

What is Safeguarding?

Safeguarding means:

- Protecting children from abuse and neglect.
- Supporting their physical and mental wellbeing.
- Helping them grow up safely.

- Taking action when concerns arise.

Children are anyone under the age of 18.

Everyone's Responsibility

Safeguarding is the responsibility of:

- Staff
- Volunteers
- Trustees
- Managers

Anyone who has a concern must act on it.

What Should Staff and Volunteers Do?

All staff and volunteers must:

- Attend safeguarding training.
- Know the signs of abuse.
- Report concerns immediately.
- Keep information confidential where appropriate.
- Record concerns accurately.

Never assume someone else will report a concern.

Types of Abuse

Staff should be aware of:

Physical Abuse

Deliberately causing physical harm.

Emotional Abuse

Repeated behaviour that damages a child's emotional wellbeing.

Sexual Abuse

Forcing or persuading a child to take part in sexual activities.

Neglect

Failing to meet a child's basic physical or emotional needs.

Additional Safeguarding Concerns

These may include:

- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- County lines activity
- Domestic abuse
- Female genital mutilation (FGM)
- Forced marriage
- Radicalisation and extremism
- Child-on-child abuse
- Online abuse
- Serious violence

If a Child is in Immediate Danger

- Call **999** immediately.
- Contact Children's Social Care.
- Inform the DSL as soon as possible.

For urgent safeguarding concerns:

- **MASH:** 01752 668000
- **Out of Hours:** 01752 346984

If a Child Tells You Something

You should: ✅ Listen carefully.
✅ Stay calm.

✅ take what the child is saying seriously
✅ Reassure them they did the right thing.
✅ Explain you may need to share the information to keep them safe.
✅ Write down exactly what was said.
✅ Tell the DSL immediately.

You should not: ❌ Promise to keep it secret.
❌ Ask leading questions.
❌ Investigate yourself.

Confidentiality

Information should only be shared on a need-to-know basis.

However:

- Keeping children safe comes before confidentiality.
- Concerns must be shared with safeguarding professionals when necessary.
- Staff must never promise complete secrecy.

Concerns About Staff or Volunteers

If you are concerned about the behaviour of a staff member or volunteer:

- Report it immediately to the CEO.
- If the concern is about the CEO, report it to the Chair of Trustees.
- Allegations will be handled fairly, confidentially, and in line with safeguarding procedures.

Children with Additional Vulnerabilities

Extra attention should be given to children who:

- Have SEND or disabilities.
- Are young carers.
- Experience discrimination.
- Have mental health difficulties.
- Are looked after or previously looked after.
- Are living in difficult family circumstances.

Record Keeping

All safeguarding concerns must be:

- Recorded promptly.
- Accurate and factual.
- Stored securely on Beacon.
- Shared only with those who need the information.

Training

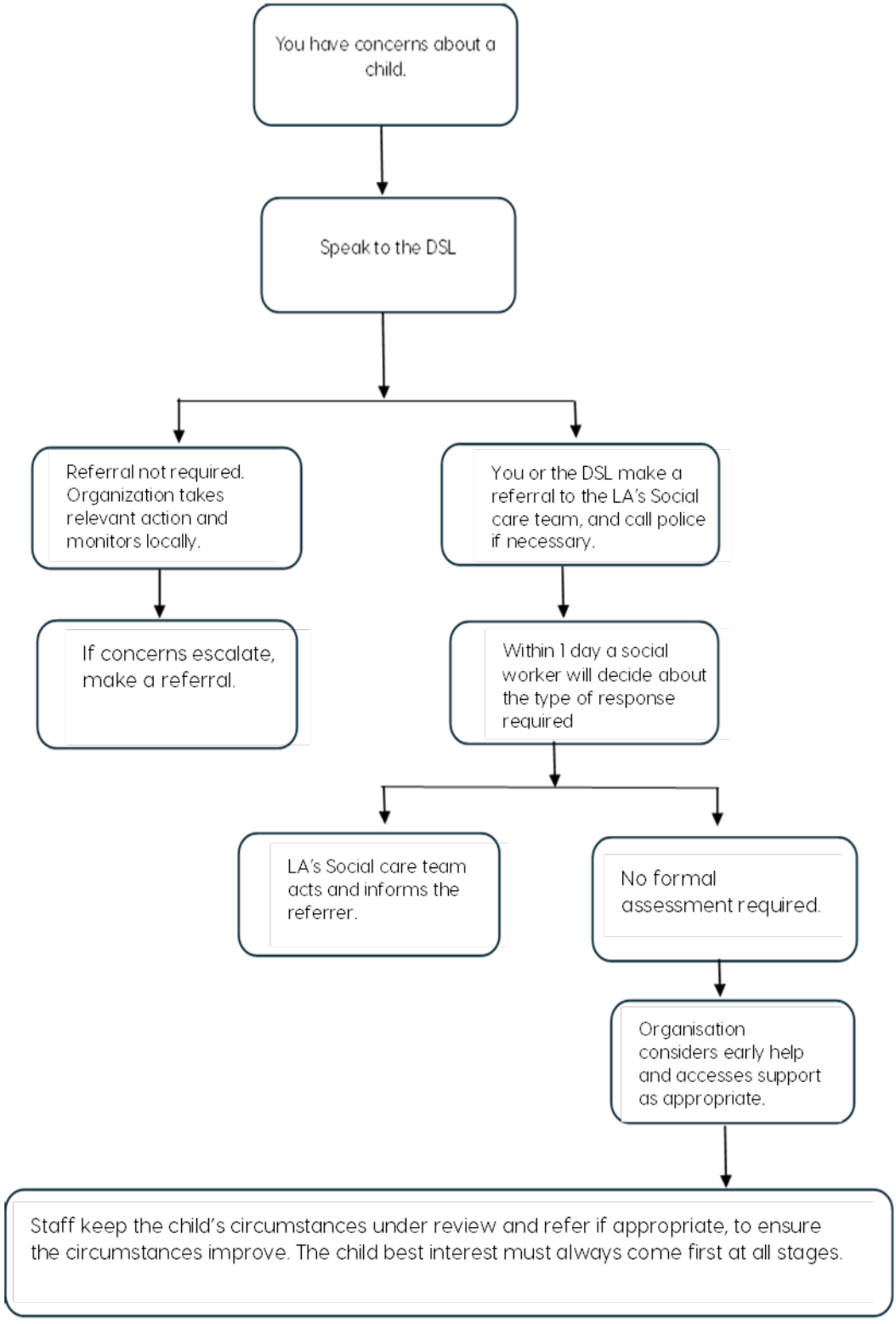
- All staff receive safeguarding training when they start and annually thereafter.
- Volunteers receive safeguarding awareness training.
- The DSL receives advanced safeguarding training and regular updates.
- Trustees receive safeguarding training appropriate to their role.

Policy Review

This policy is reviewed every year and approved by the Board of Trustees.

Key Message **If you see something that worries you, hear something concerning, or simply have a gut feeling that a child may be at risk, report it immediately. It is always better to raise a concern than to do nothing.**

summary:


You have concerns about a child.
Speak to the DSL
Referral not required. Organization takes relevant action and monitors locally.
You or the DSL make a referral to the LA's Social care team, and call police if necessary.
If concerns escalate, make a referral.
Within 1 day a social worker will decide about the type of response required
LA's Social care team acts and informs the referrer.
No formal assessment required.
Organisation considers early help and accesses support as appropriate.
Staff keep the child's circumstances under review and refer if appropriate, to ensure the circumstances improve. The child best interest must always come first at all stages.

1. Aims

We recognise that:

- the welfare of the child/young person is paramount
- working in partnership with children, young people, parents, carers and other agencies is essential in promoting young people's welfare
- safeguarding is everybody's responsibility

We believe every child and young person has the right to feel safe, valued, listened to and respected.

We recognise that children who have experienced trauma, grief, loss or adversity may need support that is compassionate, consistent and informed by an understanding of their experiences.

We are committed to:

- seeing the child behind the behaviour
- listening to children's voices and experiences
- building trusting relationships
- promoting safety, wellbeing and resilience
- ensuring children feel respected and included
- taking concerns seriously and responding promptly
- working alongside families and partner agencies to achieve the best outcomes for children
- recognising strengths as well as vulnerabilities
- creating inclusive and accessible services for all children and young people

We will seek to safeguard children and young people by:

- valuing them, listening to, and respecting them;
- adopting child protection guidelines through our procedures and a code of conduct for staff and volunteers;
- sharing information about child protection and good practice with children, parents, staff and volunteers;
- sharing information about concerns with agencies who need to know, and involving parents and children appropriately;
- providing effective management to staff and volunteers through supervision, support and training;
- ensuring appropriate action is taken in the event of incidents/concerns of abuse and that support is provided to the individual/s who raise or disclose the concern;
- ensuring that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;
- preventing the employment/deployment of unsuitable individuals via safer recruitment;
- ensuring robust safeguarding arrangements and procedures are in operation.

2. Legislation and Statutory Guidance

This policy is based on the following legislation:

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Working together to safeguard children 2026, an updated guide to multi-agency safeguarding.
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Prevent duty guidance - GOV.UK (updated in 2024), which explains duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any, or all, of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment, religion and race).
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Children includes everyone under the age of 18.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with e.g. child who has been harmed/child impacted by harm.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

4. Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to disclosing abuse or professionals assessing it as such. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

5. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and Trustees in the charity. Our policy and procedures also apply to off-site activities.

5.1 All staff and grief services volunteers/placement students

All staff, grief services volunteers and placement students will:

- Read and understand our safeguarding policy and procedures annually as well as attend safeguarding training led by the DSL (designated safeguarding lead) and members of the grief services team.
- Sign a declaration each year to say that they have reviewed the policy and attended the training.

All staff and grief services volunteers will be aware of:

- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported.
- The fact that children can be at risk of harm inside and outside of their home (contextual safeguarding), including online
- What to look for to identify children who need help or protection

5.2 The designated safeguarding lead (DSL)

The DSL is the manager of Grief Services. Our DSL is Corinne Picton. The DSL takes lead responsibility for child protection and wider safeguarding in the charity.

The DSL will be available during normal working hours for staff to discuss any safeguarding concerns but can also be contacted by email outside of working hours. This will be monitored outside of working hours periodically.

The DSL will be given the training and resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Refer concerns, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

The DSL will also:

- Keep the CEO informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate

5.3 The Board of Trustees

The Board of Trustees are responsible for ensuring that those benefiting from, or working with, our charity, are not harmed in any way through contact with it. The Charity Commission for England and Wales provides guidance on charity compliance which should be followed.

The Board of Trustees will:

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the CEO to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements Welcome to the Plymouth Safeguarding Children Partnership...
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training and that such training is regularly updated and is in line with advice from the safeguarding partners
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - The charity has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including volunteers). Appendix 3 of this policy covers this procedure

5.4 The CEO

The CEO is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction

    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 1)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

6. Confidentiality

Beacon is our secure online case management system. It is used by staff and volunteers that work with families to record details about them and any work undertaken with them. Access to Beacon is secured using a password that is individual to each user.

Staff and grief services volunteers are aware that:

- Timely and accurate recording is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. If staff are in any doubt about sharing information, they should speak to the DSL (or other staff, if DSL is unavailable)

7. Recognising Abuse and Taking Action

Updated information and definitions of types of abuse can be found on the NSPCC website Types of child abuse | NSPCC

If you have any concerns that a child has been, or is, at risk of significant harm, or have any concerns about their welfare, or that of another child or vulnerable adult you must:

- Speak to the DSL or nominated staff member as soon as is reasonably practicable
- Record your safeguarding concerns using our Beacon Secure system

The DSL will advise actions and next steps based on the agreed local Plymouth Safeguarding Children's Partnership procedures

Staff, volunteers, and trustees must be aware of these procedures which can be found at Welcome to the Plymouth Safeguarding Children Partnership... These are summarised as follows

If you are worried about a child or young person and believe that the involvement of statutory services (Children's Social Care) might be appropriate, please complete a MASH Contact Form. If you have an urgent child protection concern, then please call Plymouth Multi-Agency Safeguarding Hub on ***01752 668000 (or***

01752 346984 out of hours). *You will be asked to follow up your call by submitting a MASH Contact form the same day.*

If you are a professional you can call the MASH Consultation Line for Professionals where you can call for advice and guidance around those situations where you're unclear or unsure about the appropriate support, or if a referral into children's social care is needed.

You can speak to the MASH Consultation Line about a range of hypothetical issues or concerns.

To speak about a specific child you should have consent from the parents or carers providing it is safe to do so. The only time this isn't applicable is when seeking consent might place a child at risk of further harm.

The number to call is ***01752 304339*** *and is open 9am to 4pm, Monday to Friday (excluding Bank Holidays) and will not be available during hours that are covered by the Out of Hours Team.*

The consultation line does not replace the right of partner agencies to make a referral directly into Children's Social Care when the concerns may constitute significant harm.

Online Professional Enquiry Form

If you want to speak to the allocated social worker for a child already receiving children's social care support, and it's not an urgent safeguarding concern, you can request a call back by completing the online Professionals Enquiry Form below.

Online Professionals Enquiry Form - Plymouth City Council - How to Contact Us if you are Working with a Child

For staff working with families:

https://www.plymouth.gov.uk/professionals-how-contact-us-if-you-are-working-child

7.1 When a child tells you about safeguarding concerns

If a child tells you about a safeguarding issue, you should:

- Listen to them and take their account seriously. Allow them time to talk freely and do not ask leading questions
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation in the safeguarding section of Beacon as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to the CEO or take advice from local authority children's social care. **You can also seek advice at any time from the NSPCC helpline on 0808 800 5000**. Share details of any actions you take with the DSL as soon as practically possible.

7.2 Resolving professional differences of opinion

Usually, considering the safeguarding of children and young people, any differences of opinion regarding provision from Plymouth Child and Social Care (CSC), can be resolved between their staff and those of Jeremiah's Journey. Should there be a disagreement that cannot be resolved directly between individuals, the DSL or CEO will follow the procedures set out below

PSCP-Resolving-Professional-Differences-v1-April-2025.pdf

7.3 Safeguarding concerns related to someone in a professional capacity (paid or unpaid)

If you are told about, or have concerns relating to someone who is involved with a child in a professional capacity (in both paid and unpaid roles), you should speak with the team's DSL (Corinne Picton) who will follow the advice and guidance set out by the LADO (Local Authority Designated Officer) LADO Advice & Guidance for Managing Allegations Regarding Professionals and Volunteers - Plymouth Safeguarding Children Partnership

7.4 Concerns about a staff member or volunteer within Jeremiah's Journey

If you have concerns about a member of staff (including a volunteer), or an allegation is made about a member of staff (including a volunteer) posing a risk of harm to children, speak to the CEO as soon as possible. If the concerns/allegations are about the CEO, speak to the Chair of Trustees.

The CEO or Chair of Trustees will then follow the procedures set out in appendix 1, and follow the PSCP (Plymouth Safeguarding Children's Partnership) LADO procedure

LADO Advice & Guidance for Managing Allegations Regarding Professionals and Volunteers - Plymouth Safeguarding Children Partnership

7.5 Allegations of abuse made against other young people

We recognise that children are capable of causing harm to their peers. Our bereavement sessions are designed to ensure all feel able to be open, vulnerable and able to share their experiences, which can only be achieved through an environment of respect.

Procedures for dealing with allegations of child-on-child or peer-to-peer harm

If a child makes you aware of harm against another child:

- You must record what the child has said on Beacon and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required).

8. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers, unless doing so would increase risk to that child. Decisions regarding this will be made in consultation with the DSL.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. These decisions should be made in consultation with the DSL. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

9. Children with special educational needs, disabilities, or health issues

We recognise that children with SEND, or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Increases in opportunities to harm (e.g. provision of personal care)
- Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- Communication barriers and difficulties in managing or reporting these challenges.

10. Looked-after and previously looked-after children

We will ensure that staff (and volunteers where appropriate) have the knowledge and understanding to keep looked-after children and previously looked-after children safe. This is relevant as we work with young people up to the age of 25. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked-after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements, and named social workers. These are to be recorded on our Beacon system

11. Complaints and concerns regarding safeguarding procedures

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 1). Contact the DSL with any other complaints that relate to safeguarding, and they can be considered individually.

12. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded securely using our Beacon case management system. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

In addition:

- Appendix 1 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

13. Training

All staff members and grief services volunteers will undertake safeguarding and child protection training at induction, which will be updated annually, to ensure they understand the charity's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the organisation safeguarding approach and wider staff training.
- Be in line with advice from The Plymouth Safeguarding Children's Partnership (PSCP) and other agencies.

13.1 The DSL

The DSL will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, or taking time to read and digest safeguarding developments).

13.2 Trustees

All trustees receive training about safeguarding and child protection. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the charity to deliver a robust approach to safeguarding

14. Monitoring arrangements

This policy will be reviewed **annually** by Corinne Picton, DSL. At every review, it will be approved by the full board of trustees.

Appendix 1: allegations of abuse made against staff and volunteers (including low-level concerns)

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that those working in a position of trust with children (regardless of whether their role is paid or unpaid) has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of the organisation.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our Local Authority Designated Officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the CEO, or the chair of trustees where the bereavement services manager is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the subject of the allegation until the case is resolved

Suspension of the subject of the allegation will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the organisation so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children

If in doubt, the case manager will seek views from the CEO and the LADO, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the subject of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree, and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the charity and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against staff or volunteers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a staff member will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific Actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed, or the individual resigns or otherwise ceases to provide their services, the charity will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation.

Unsubstantiated, Unfounded, False, or Malicious Allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false, or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, a referral to children's social care may be appropriate.

Confidentiality and Information Sharing

The organisation will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police, and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, or when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration about whether the information will be referred to in any future reference

In these cases, the organisation will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated, or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the Local Authority's Designated Officer to determine whether there are any improvements that we can make to the organisation's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension

- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent Allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the bereavement team that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: Concerns that do not Meet the Harm Threshold

This section applies to all concerns (including allegations) about members of staff, including volunteers, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside of the organisation.
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of Low-level Concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in, or on behalf of, Jeremiah's Journey may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating children.

Sharing Low-level Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer concerns about their own conduct or behaviour
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the organisation's safeguarding system

Responding to Low-level Concerns

If the concern is raised via a third party, the CEO will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The CEO will use the information collected to categorise the type of behaviour and determine any further action, in line with the organisation's staff code of conduct. The CEO will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record Keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely, and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold we will refer it to the LADO.
- Retained at least until the individual leaves employment at the organisation.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.