



# Oasis Restore

## Safeguarding Policy

### January 2024

<u>Version</u>	<u>Signed and agreed by</u>	<u>Date</u>	<u>Review by</u>
1.	Responsible Individual, Registered Manager and Directors	15 <sup>th</sup> January 2024	January 2025 (or when needed)

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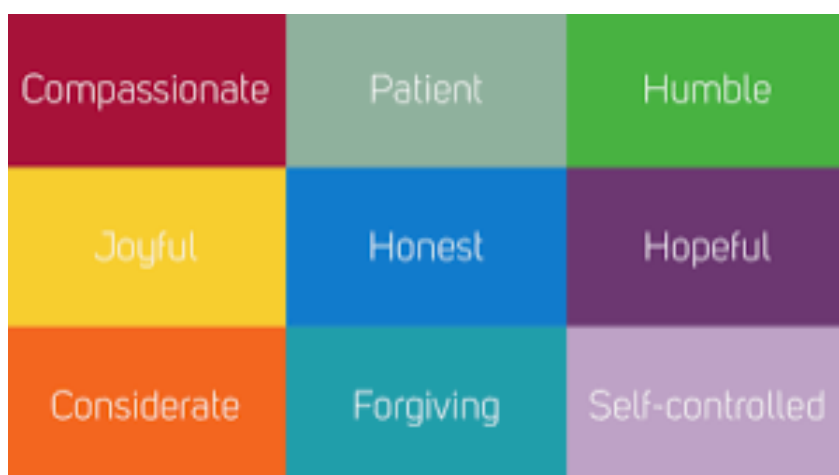
## Introduction

The Oasis vision provides the foundation for our commitment to safeguarding and child protection. Our vision is for community: a place where everyone is included, making a contribution and reaching their God-given potential. Our ethos is a statement of who we are, and it is an expression of our character. Rooted in the story and beliefs of Oasis, we describe our ethos through a particular set of values that inform and provide the lens on everything we do:

- A passion to include everyone.
- A desire to treat people equally respecting differences.
- A commitment to healthy, open relationships.
- A deep sense of hope that things can change and be transformed.
- A sense of perseverance to keep going for the long haul.

It is these ethos values that we want to be known for and live by, and which shape our policies. They are the organisational values we aspire to. We are committed to a model of inclusion, equality, healthy relationships, hope, and perseverance throughout all the aspects of life. Everyone who is part of Oasis needs to align themselves to these ethos values. We recognise and celebrate the richness that spiritual and cultural diversity brings to our communities. We respect the beliefs and practices of all faiths and will provide a welcoming environment for people of all faiths and those with none.

We also believe that this process of continually developing our character and being transformed to become the best version of ourselves is important for every staff member and child. Therefore, we actively promote and practice the Oasis 9 Habits which are an invitation to a way of life characterised by being compassionate, patient, humble, joyful, honest, hopeful, considerate, forgiving, and self-controlled. We believe that by becoming people who live this way, by becoming the best version of ourselves, we are transformed, and we are also able to play our part in bringing transformation locally, nationally and globally.



In line with the Oasis ethos and 9 Habits, Oasis Restore fully recognises its responsibilities to safeguard children, and aligning to the principle that safeguarding must be central to everything we do.

At Oasis Restore safeguarding is central to our practice and all behaviour, challenges and experiences of staff, children and visitors will be seen through the lens of safeguarding first and foremost. Welfare and safety of children is at the heart of Oasis Restore's vision for providing 'Excellent Education, Care and Wellbeing at the Heart of our Communities'. In this policy, a 'child' means all children under 18 years of age. Oasis Restore will also be home to 18-year-olds supporting their transition either into the community or onto the adult secure estate, for the purpose of

our safeguarding arrangements we will respond to this cohort in the same way as our children and have not differentiated between them within the majority of this policy.

Oasis Restore is the first secure school in the UK. The secure school is a custodial placement option for children aged 12-18. Oasis Restore registered as both a secure children's home, and a 16-19 Academy, regulated by Ofsted in line with the Secure Children's Home Regulation 2015, and inspected by Ofsted for Education. Through our cornerstones of Relationships, Community and Discovery, our offer to children is driven by their individual needs and safety. All children living with us at Oasis Restore will be sentenced, or remanded into youth custody by the courts and therefore cannot leave until completion of sentence or following decisions from the court. Each child will have up to a 12-week induction with us giving them the opportunity to get to know staff, routines, and our offer, as well as allowing us to get to know them and the people most important to them. This induction period will include several assessments, helping us to understand their holistic needs and developing with them a plan that meets all their needs and starts where they are to ensure that we are setting achievable goals. During this time, we aim to provide children with a foundation of safety and develop with them individual strategies and plans for when they need support or if they are not feeling safe, this includes a shared understanding to our incident responses.

This policy aims to set out our response to safeguarding our children, their families, staff and visitors.

### What is this policy about?

Oasis Restore realises the safeguarding and protection of its children is fundamental to this purpose. In accordance with the relevant law and guidance, this policy sets out our procedures for safeguarding and child protection. It applies to all Oasis Restore staff and volunteers working Oasis Restore in:

- Education
- Enrichment
- Residential
- Health
- The Lodge
- Facilities and Estates

At Restore, aligned with Child First principles, we are guided by the truth that children are different from adults, and not yet ready for the responsibilities and power that adults hold. Each child's voice is listened to, valued and celebrated, and we create opportunities for them to practice agency and autonomy, to contribute and to shape how we work, within what is ultimately a hierarchical community where adults make the final decisions.

We aim for children to love and value their time at the school, and to leave ready to contribute to a safer community, enriched by the relationships and opportunities we have created with them. In this, we acknowledge the impact of traumatic early life experiences, abuse, oppression, and many forms of adversity, on these children and on those around them, and the magnitude and importance of the task of beginning to address this and to influence wider system change. Our capacity to do this rests on this founding framework of care, that draws on our guiding principles and values and operationalises them in terms of our commitments to the children, the staff within Oasis Restore, and the wider systems in which we work. Some of our children may need additional support to overcome their experiences and trauma in order to keep them safe. Our children are also more likely to have additional needs and SEN such as ADHD, autism. Please see additional policy on SEND and inclusion.

At Oasis Restore, our integrated framework of care is about:

- Relationship (with us, with each other, with professionals, peers and loved ones)
- Community (within and outside and beyond Restore)
- Discovery (of themselves, others, their world, their opportunities and offering an education for life)

It is vital that we understand when and how to keep children in our care safe, particularly given that many of them will have been chronically unsafe in their lives until now. Our framework supports our decision-making, and, in its development, we have agreed principles that underpin our work and practice. We are committed to:

- **RELATIONSHIPS** through building trust.
- **EMPOWERMENT** through providing choices and nurturing responsibility.
- **SAFETY** through providing consistency, a secure base and a supportive and reflective community.
- **TRAUMA-RESPONSIVE** practice through creating psychologically informed culture and systems.
- **OWNERSHIP** through providing life affirming opportunities within and beyond the school, and within it, a sense of belonging and community.
- **RESTORATION** of hope and dignity...through offering support, challenge, and opportunities to repair damaged relationships.
- **ENQUIRY** through encouraging openness and reflection

Safeguarding and promoting the mental, emotional and physical welfare of children is the responsibility of everyone who works or volunteers at Oasis Restore. Consequently, everyone who comes into contact with our children has a role to play in safeguarding and child protection. In doing so, all staff and volunteers should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

Oasis Restore is situated in Medway and the Director of Children's Services is therefore responsible for all children who are living with us at Restore. We will therefore notify and where appropriate involve Medway in our safeguarding processes with respect to our children in line with Medway's multi-agency safeguarding arrangements. For the majority of our children Medway will act as the host Local Authority. Whilst placed with us in Oasis Restore. Children's Ordinary residence will not change and therefore each child will also have a home Local Authority. This will be the Local Authority where the children resided before living in Oasis Restore. For children in care (S31, S38A, S20 CA89) the home Local Authority will be the Local Authority responsible for their care. We will therefore also work within each Local Authority's multi-agency Safeguarding arrangements to ensure a robust plan and safeguarding response around every child and their family.

The Head of Safeguarding and Transitions will also be the Designated Safeguarding Lead (DSL) and they will ensure that all staff are confident in their safeguarding knowledge, processes, systems, and practice. This will include bespoke safeguarding training, local safeguarding updates, and support, which will be championed via the Restore Networkers and Deputy DSLs. The DSL will manage and escalate all proportionate matters to the Principal Director and Registered Manager as well as celebrate good practice and address when practice is not meeting our standards.

### Who is this Policy for?

This policy applies to the whole of Oasis Restore, all staff and volunteers. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone has a role to play in child protection and safeguarding our children i.e. Principal Director, Senior Leadership, Designated Safeguarding Leads, Staff, Suppliers, Volunteers, Board members, etc.

Raising concerns for the safety of our children is not always easy for staff, partners, families, and children, and we recognise this, but we will ensure that the processes and arrangements around this feel safe, appropriate and are fully understood. Relationships and how we manage these incidents are extremely important and we devote considerable resource to establishing and sustaining these.

### Policy Statement

This safeguarding and child protection policy is intended for use across Oasis Restore. It is about 'keeping our children safe'.

This policy should be followed and adhered to in all situations and circumstances when the safeguarding of our children is at stake. If unclear, there are staff with safeguarding responsibilities and senior leadership are available to talk through for advice and guidance.

This policy will be updated in line with changes within a national arrangement.

### Legislation and policy guidance underpinning this policy

This policy has been developed in line with the following key documents:

- Children's Home Regulations (2015)
- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (2023), DfE
- Working Together to Safeguard Children, July 2023, HM Government
- Inspecting safeguarding in maintained schools and academies, September 2019, Ofsted.
- Inspecting safeguarding in safeguarding in early years, education and skills settings, September 2019, Ofsted
- Education for a Connected World, UKCCIS 2018
- Multi-agency Statutory Guidance on Female Genital Mutilation, July 2020, HM Government.
- Protecting Children from Radicalisation: the prevent duty, August 2015, DfE
- The Independent School Standards, 2015, DfE
- Competence Still Matters: Safeguarding training for all employees and volunteers 2014, LSCB
- Mental Health and Behaviour in Schools: Departmental Advice, 2014
- The Children Act 1989 and 2004 and The Education Act 2002.
- Guide to Children's homes regulations, including quality standards (2015)
- The Oasis Restore Framework
- The Oasis Restore Restorative Policy (behaviour management)
- The Oasis Restore Critical Response Framework
- The Oasis Restore Missing Policy
- The Oasis E-Safety Policy
- The ROTL Policy
- The Restore guidance and Policy for Transition Arrangements

This policy is in place to:


- Provide a framework and give clear responsibilities.
- Support need and provide help (assess/ plan/ review)
- Understand organisational responsibilities (referrals) Internal and external arrangements.

- Facilitate multi agency arrangements (come together to talk)
- Create responsibility (and allow best practice to thrive)
- Constantly improve child protection and safeguarding practice (learning and improvement- example from child death reviews)
- Apply Threat to Life Notification (highest risk children when there is a threat to life)

## Oasis Restore Responsibilities

At Oasis Restore, we recognise that because of the day-to-day contact with children, staff and volunteers, we are well placed to observe signs of harm, abuse, neglect, victimisation and /or exploitation. Oasis Restore recognises that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation, and some sense of blame. Oasis Restore may be the first stable, secure, and predictable element in their lives. Oasis Restore will support all children through:

- Maintaining an environment where all children feel safe, secure, are encouraged to talk, and are listened to.
- Ensure all children know the adults at Restore who they can approach if they have worries.
- Increase children's awareness to safety and how they can identify risk and navigate situations where they may feel or be unsafe. This will include awareness of grooming, exploitation, extremism, radicalisation, and peer on peer abuse.
- Create access and promote the voice of children through to leadership.
- Appropriate staff conduct, in line with our integrated framework of care.
- Access to therapeutic support and intervention
- Each child will have a safety plan built into their Restore Plan that meets their individual needs and allows children to communicate when struggling to adjust, manage or regulate.
- Relevant curriculum design and implementation to teach pupils about staying safe, including when they are online, through PHSCE.
- A robust induction process into the school creating a foundation to supporting each child to settle into the school.
- Weekly Core Team meetings with and around each child. The Core Team includes the staff who are permanently allocated to the child's team, from the residential care, health and education parts of the system, the child's Networker and the House Manager. This provides a safe and containing group with frequent oversight over the child, any concerns s/he raises, and over the plans around them.
- A bespoke learning and enrichment offer for each child that starts where they are and is driven by children's aspirations, routine and high aspirations relative to their starting point.
- Transition planning that begins from day 1 and is child-led. This will include the Core Team around the child, and their family.
- Daily practice underpinned by the Oasis ethos, vision, values and 9 Habits.
- Consistent implementation of Restore Health & Safety, Anti-bullying, Safer recruitment, Restorative (behaviour management) and online safety policies and related practice.



Safety through  
connection

We will support our staff by:

- Providing effective, ongoing training and development for all staff.
- Addressing concerns and making robust referrals to other agencies, at the earliest possible stage.
- Develop formulation for group and case discussions and learning.
- Effective line management and coaching to support the wellbeing and development of staff.

- Require all staff to attend clinical supervision and reflective practice, which acknowledges the complex work of keeping children safe and maintaining relationships and provides a source of oversight and practice development. This space also allows a safe space for staff to process the complex emotions of working in this setting with our children.
- Open access to leadership and management for escalation concerns.
- Creating a culture of care, empowerment, and trust with staff.

We will work with our partners in safeguarding our children and young adults:

- Developing effective links with relevant agencies in all matters regarding safeguarding and child protection
- Keeping meticulous, written records of concerns about children, even where there is no need to refer the matter immediately (dates, times, person/s responsible and actions) ensuring all records are kept securely.
- Ensuring the suitability of all staff through safe recruitment practice.
- Ensuring all Oasis Restore staff and volunteers understand their responsibilities regarding safeguarding and child protection.
- Ensuring that parents and carers understand the responsibility placed on the Oasis Restore and its staff for safeguarding and child protection.
- Maintaining clear procedures for reporting allegations against staff members (through LADO)
- Close liaison with other agencies such as but not limited to social services, Youth Offending Teams, Child and Adult Mental Health Services, and Psychology Services.

We will ensure that Restore is a safe space for children, staff and visitors:

- Our Restore Framework holds our practice in a way that promotes safety both physically but also emotionally for all.
- We will ensure that the environment is well maintained, and anything broken is quickly repaired or replaced to prevent injury but also promote a culture of care.
- There is equality in our approach to safety on arrival at Oasis Restore, and therefore everyone will experience the same process of searching as they arrive on site (children, staff and children).
- We close-circuit television across the school acting as an addition measure of safeguarding, in line with our CCTV policy.
- We map trends and hotspots so we can proactively manage and prevent risks.
- We have high end searching equipment enabling us to prevent unauthorised items entering the site.
- We have risk assessments for the site which inform our operational arrangements.

## Procedures with respect to Child Abuse

Oasis Restore is committed to safeguarding all child, staff and visitors who come to us. Our approach to safeguarding is embedded throughout our practice and is held at the forefront of our care, learning and planning for our children.

Child abuse exists where children have been physically, sexually or emotionally abused and/or exploited or neglected prior to arriving at Oasis Restore. It is important to note that children may not only suffer abuse from within their home and family and that child abuse also exists outside the home in the community and online from peers, and adults known to children as well as by strangers and trusted adults. Child exploitation, trafficking, radicalisation, gangs and online abuse are all forms of child abuse. Its therefore important that all those who come into contact with our children and their families know the signs of abuse and the relevant procedures.

Oasis Restore has a responsibility in identifying and responding to all forms of child abuse. We have a duty to respond to these concerns through support for the child and anyone else impacted or involved in the abuse. To do this close multi-agency working is required with partner agencies both within Oasis Restore and externally, those who have a statutory responsibility for the children. All staff will access training to support them to identify safeguarding concerns and risks and well as ensure staffs confidence in acting on these concerns in line with our safeguarding processes. This includes reading our safeguarding policies and a record confirming staff's reading and understanding of this policy.

The Qualified Designated Safeguarding Lead (DSL) is responsible for ensuring that children are identified, and the appropriate agency involved. The DSL or a member of the safeguarding team will attend all reviews called by the Local Authority and may call on appropriate members of staff for report in the absence of their attendance. The DSL will ensure that the Registered Manager and Principal Director are aware of safeguarding incidents to enable them to complete statutory notifications to Ofsted where required.

Oasis Restore will also have 3 Deputy Designated Safeguarding Leads (DDSLs) as outlined above. This is to ensure that staff have access to safeguarding advice and support as easily as possible as well as adding resilience and support across the schools and homes. The Designated Safeguarding Lead will ensure that the Deputy Safeguarding Leads are fully supported in their role. All DDSL's will have access to ad hoc 1-1 consultation and support with the DSL, and monthly reflective meetings to ensure that there is consistency in application of thresholds and advice.

When there are concerns (known or suspected, current and historical) about child abuse these will be reported to the Deputy/Designated Safeguarding Lead as soon as possible. This is inclusive of times when children are overheard talking about child abuse in any form, and intelligence about abuse or potential abuse. Where there are immediate safeguarding concerns, staff must first discuss their concerns directly with the DSL/DDSL, then record their concern on the Child Protection System. This ensures that there is a lead person managing the concerns and ensuring that there is a consistent capture all the information required.

The DSL and DDSLs are based on site at Oasis Restore and will be present to support and manage safeguarding incidents or concerns. Out of school hours the senior leadership team will be rota-ed to support in managing safeguarding incidents.

Oasis Restore has a Transitions policy which outlines the processes in place to ensure that safeguarding and child protection concerns are considered and managed as part of planning for children's transition on from Oasis Restore. This is inclusive of any off-site or residential visits through ROTL or part of resettlement planning.

## Safeguarding

Safeguarding our children means we aim to:

- Protect them from maltreatment in our care but also as part of their transition.
- Preventing impairment of their health and/or development whilst in our care and in preparation for transition.
- Ensure they grow up in circumstances consistent with the provision of safe and effective care.
- Undertake a caring role to enable children to have optimum life chances, so they can enter adulthood successfully.
- Protecting children from those whose aim is to exploit them, both whilst they are in our care and as part of their transition.

Safeguarding is a concept that not only relates to our children but also covers a wider range of issues:

- Staff conduct
- Staff Safety



- Health and safety
- Bullying
- Online safety for our staff and our children
- Arrangements for meeting medical needs, providing first aid and/or intimate care.
- Building security
- Alcohol, drugs and substance misuse
- Therapeutic care
- Physical intervention and restrictive practice (reasonable force).

To ensure robust safeguarding approaches within Oasis Restore it is important that we recognise the role of sharing information with our multi-agency partners to enable us to prevent and tackle all forms of child abuse both within and beyond Oasis Restore.

We keep clear records of who holds parental responsibility (PR) for our children and details as to who we should and should not be sharing information with within the child's family network. We will have at least two contact numbers for each child ensuring clear recording on whether they have PR.

As part of the induction, we will work with the network around the child to create an emergency plan as part of their Restore Plan should the child require urgent care or medical intervention. This will include details as to who needs to be contacted, and what should happen if those key contacts cannot be contacted. It is important to note that within this the child's immediate safety and protection will be prioritised.

All children will be supported to develop a personal safety plan as part of their Restore Plan this will be developed organically with children during their induction this will follow the common structure of *safety person/s, safety place and safety word/phase although we may not use this language within the plan itself*. This structure is not intended to suggest that the alternative is unsafe rather ensuring that we have simple and transferable process for day-to-day safety planning that is transferable between children's worlds both in and out of Restore. Children will have different relationships with adults at Restore and naturally will build stronger relationships with some staff more than others, understanding who these staff are is aimed at ensuring where possible those staff can be utilised to support the child in times of dysregulation, stress or restoration. We hope to also identify areas of the school that the child feels most comfortable in and places they would want (if possible) to go to support with regulation or cooling down, this may be areas such as their bedroom, sensory room, gardens library etc. We also want to understand how the child may share with us that they are feeling unsafe, anxious or require time away from class/peers etc this may be through behaviour, action, word etc. Understanding a child's communication in this way is critical to reducing risk and escalation and supporting children to think about this with us and identify communication strategies empowers them to communicate with us without in the moment having to talk about what is going on unless they are ready. This will be used as part of their transition and resettlement planning when thinking about safety planning as well as support for the family carers around children.

Where safeguarding concerns are identified and/or disclosed by a child we will ensure that the staff caring for them understand the child's experiences and needs. Staff will understand the assessments of risk and the plans in place to safeguard them. The plans will be developed with those who know the child the best and where possible with the child. The plans are in place to reduce actual harm or the risk of harm and reviewed to monitor safety and minimisation of risk.

Oasis Restore have clear safeguarding policies that are accessible for staff / parents and guardians. We will record staff having been given the policy to read and sign to state they understand the policy and its expectations. Support for this will be provided via line management.

In Oasis Restore we will be caring for children who are each at differing stages of their development. We will support children to take age-appropriate risks as part of their development of independent living skills.

Responding safely to the behaviour of children will be essential to the safeguarding of all children and staff at Oasis Restore. Therefore, we acknowledge that there will be times when restraint, single separation and managing children away from others may be necessary. However, our policy is clear that these strategies are used only in strict accordance with our framework of care to protect the child or young person and those around them.

## Safeguarding and Security

Children cannot leave Oasis Restore until their sentences or remand ends, or under special arrangements such as Release under Temporary Licence (ROTL). Therefore, security is an essential part of maintaining a safe environment for our children, and ensuring we can carry out our duty of care to safeguard children, staff, and visitors. When reviewing processes, security arrangements and responses it is essential that we do so through the lens of safeguarding to understand the broader context, risk and impact on staff, children, and families within the context of both security and safeguarding.

There are clear processes in place to ensure that the environment is safe for children including searching, perimeter checks, risk assessments etc. There are clear plans regarding movement of children between school and home and around the site. Each space has its own operational security arrangements with respect to location specific risks. This includes things such as fabric checks, evacuation processes, search of children and spaces, counting in and out processes for items such as cutlery.

Any photographs taken of children the school, homes or site cannot be shared without the review and permission of the senior leadership team, in consultation with the Head of Safeguarding and Transition, and Head of Site and Operations.

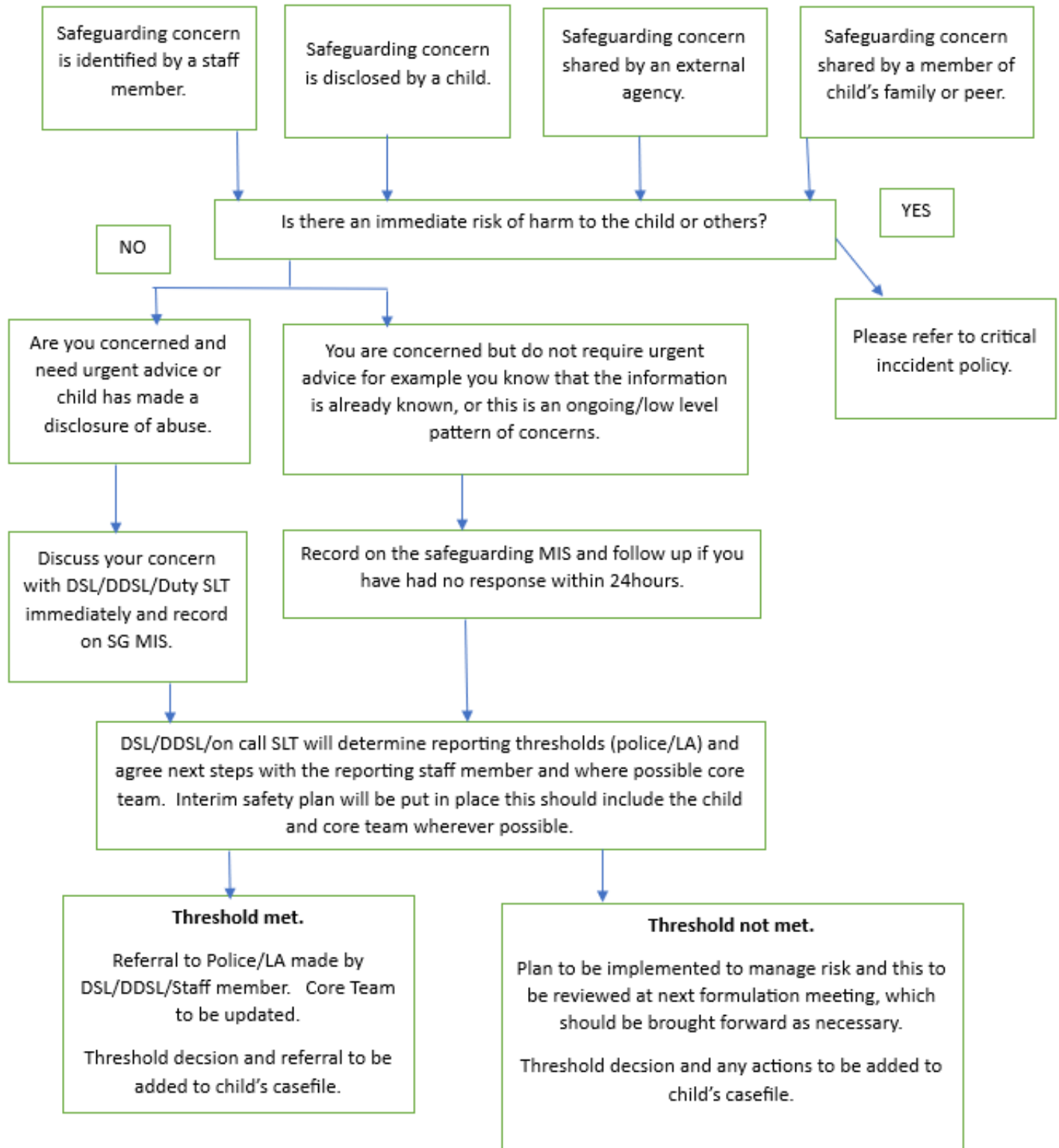
## Staff Responses to Safeguarding

All staff at Oasis Restore have a responsibility to safeguarding children. Where possible we want staff to see through the safeguarding processes and not just report concerns that are then managed by the DSL/DDSL. It is important that all staff are confident in identifying and responding to safeguarding concerns to ensure children are supported during and beyond the initial identification. Often children tell their story to staff they trust, which will often be staff that children see the most and our frontline staff. Therefore, there are no end points or handovers outlined within the processes as staff will be supported (where appropriate) to be actively involved in each safeguarding response with the support and guidance of the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead or Duty SLT, along with the core team around the child.

In this section we outline Oasis's Restore for managing safeguarding concerns.

- Safeguarding concern relating to a child at Oasis Restore,
- Managing a Safeguarding concern for a young person (18+) who is resident at Oasis Restore.
- Safeguarding concern for a child who has left Oasis Restore.
- Safeguarding concern relating to a peer or sibling or any other child outside of Oasis Restore
- Managing safeguarding concerns out of hours.
- Making a safeguarding referral to a Local Authority – how do we do this and what happens next.

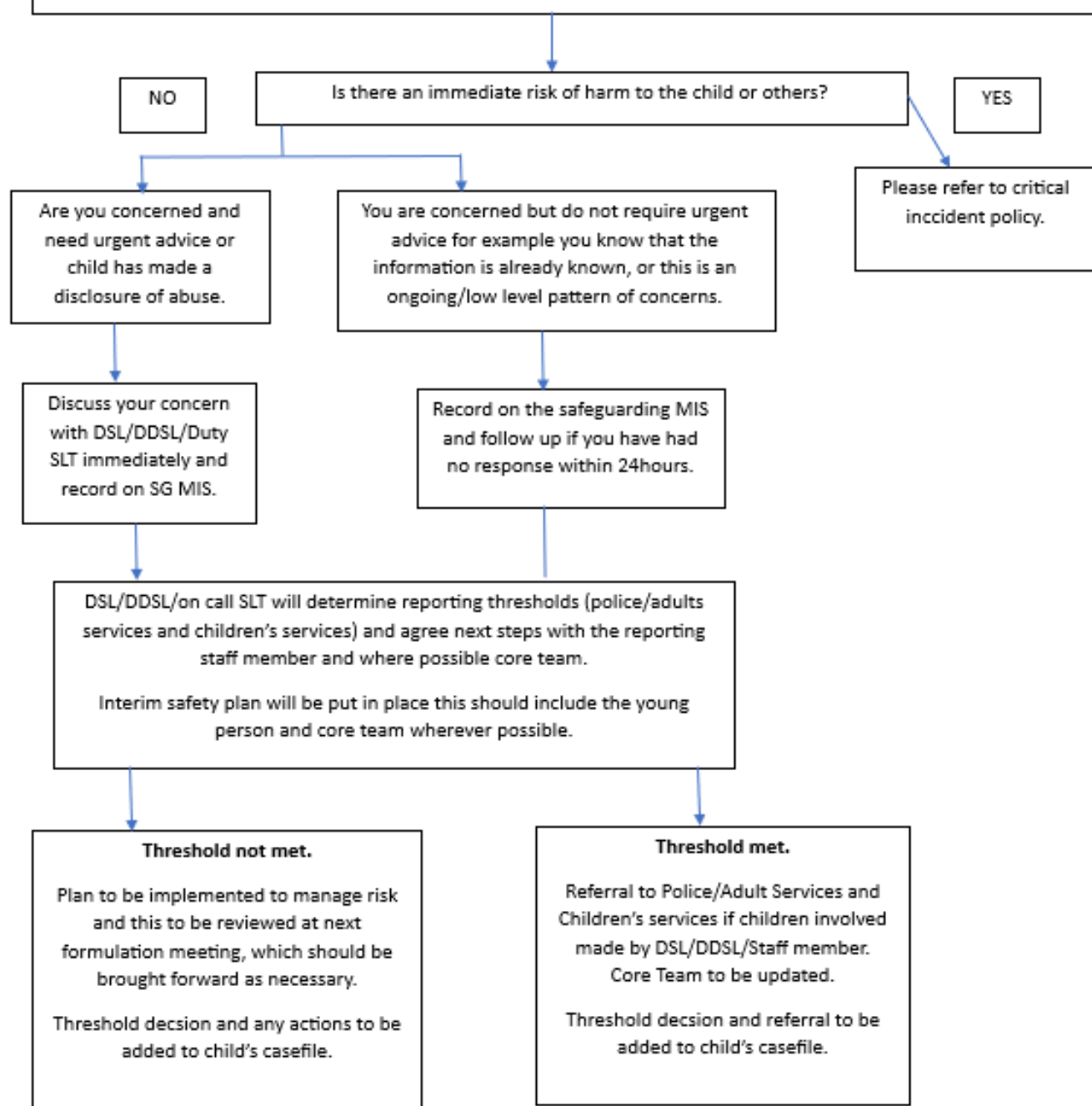
## Managing Safeguarding concerns for a Resident Child at Oasis Restore



## Managing a Safeguarding Concern for young people (18+) who are resident at Oasis Restore

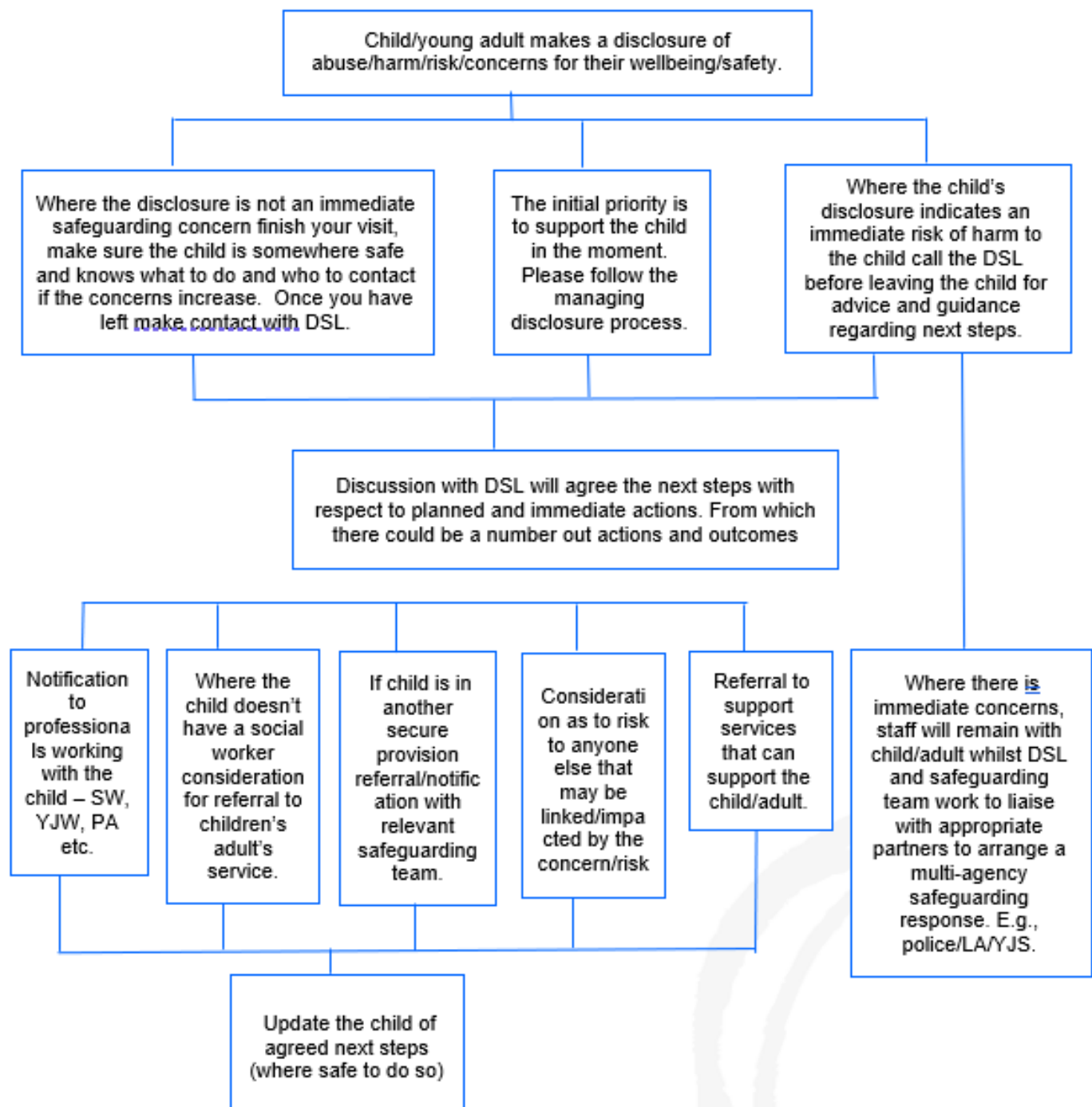
Safeguarding concern raised in relation to an 18-year-old young person.

Whilst in Restore we will our 18-year-olds will receive the same response to safeguarding concerns we are aware of the differences in legislation surrounding adults.



## Safeguarding concern for a child who has left Oasis Restore.

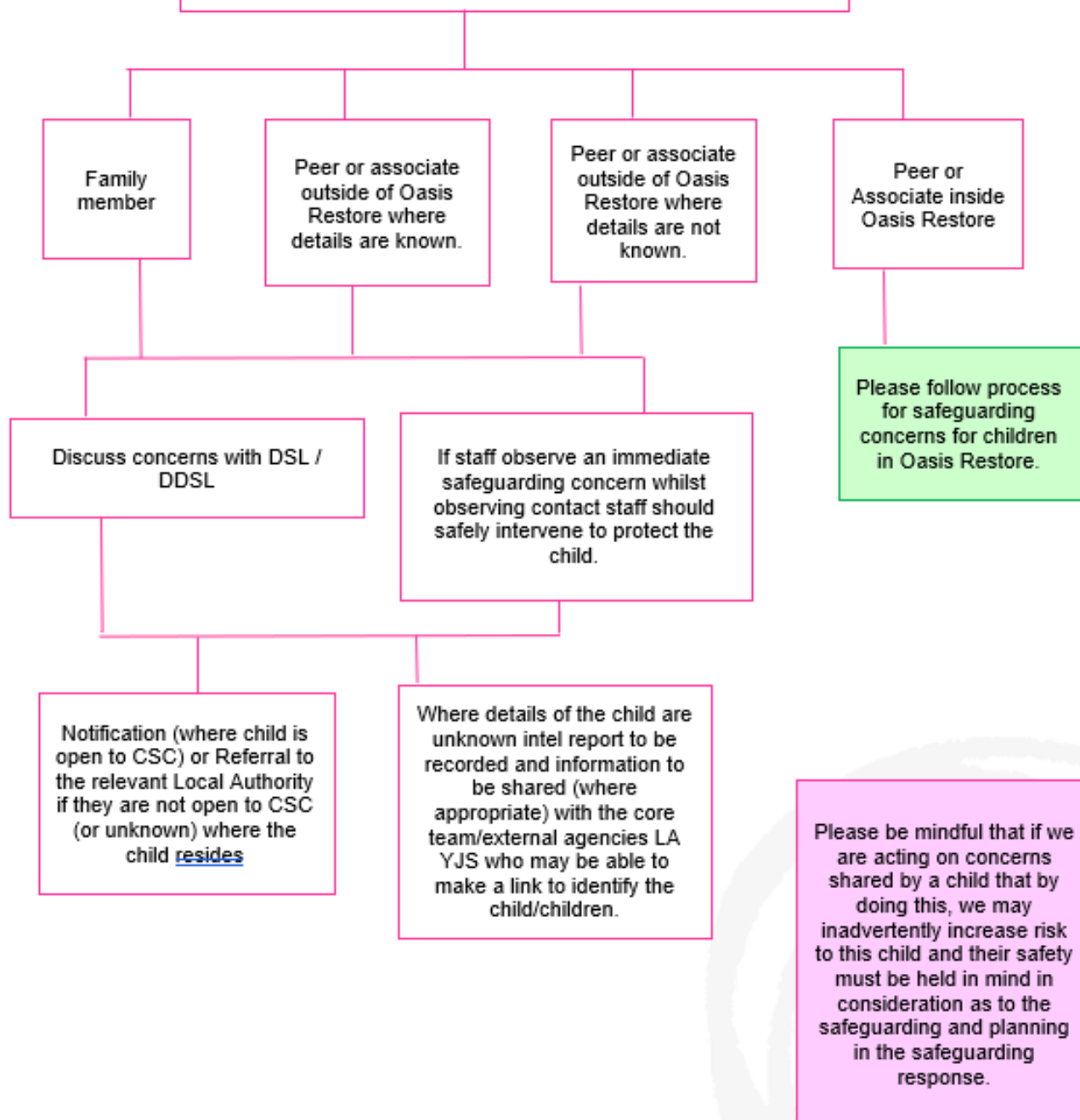
It is our vision that we will maintain contact with our children as they transition onto the next steps of their lives. It is hoped that all children and young people will have built relationships with staff that may be maintained as part of their transition and after care support. As a result of this it is possible that child may choose our staff to disclose to when they are no longer in our care. This response is to support staff in these circumstances.



**Safeguarding concern relating to a peer or sibling or any other child outside of Oasis Restore**

When we are dealing with safeguarding concerns for our children in Oasis Restore it is important that we consider wider risk to siblings/family, friends and associates, and act on this.

Concerns raised by child directly/indirectly in relation to another child. OR concerns identified during contact between child and family/friends.



Out of Hours is considered.  
Evening/Nights (Mon-Fri) 7pm – 7am  
Weekends (5pm-9am)

### Managing Safeguarding Concerns Out of Hours

Incident leading to  
immediate risk to a child or  
others.

High Risk Safeguarding  
Concern raised about a child  
either in or out of Restore.

Allegation made against staff.

Respond to the incident in line  
with the Critical Response  
Framework. Notify Duty SLT as  
soon as is safe to do so, (or  
request a colleague contacts duty  
SLT.

Duty SLT will decision making and  
next steps.

Contact Duty SLT to seek advice and guidance on next steps to  
safeguard child/staff/visitors.

Please note all members of SLT who will  
be on call will receive designated  
safeguarding training and will be deputy  
designated safeguarding leads.





## Making a Safeguarding Referral to the Local Authority

**NOTE:** We will be referring to the Children's Services in the home Local Authority responsible for the child and notifying Medway Children's Services as the host Local Authority.

You have safeguarding concerns for a child, and it is agreed with the DSL that a referral to Children's Social Care is required. Referral to be made by you alongside DSL or Restore Networker.

If there are multiple children involved, please ensure that each Local Authority are aware of who Local Authority's to ensure a coordinated response.

If the child does not have an allocated social worker a referral sent to children's services in the child/ren's home Local Authority. This process will be in line with the respective referral process. **If the concern is urgent, we need to call alongside making an online/email referral.**

If the child has an allocated social worker a referral should be sent to the allocated social worker and team manager. This process will be in line with the respective referral process. **If the concern is urgent, we need to call alongside making an online/email referral.**

Threshold Decision is made by the Local Authority. Outcome/update of your referral should be received within 24hour.

Team manager and social worker will review the referral and make a threshold decision.

Threshold not met.

Threshold met.

Advice and signposting provided. Support to be put in place by Oasis Restore. We would then consider this at next formulation meeting which may be brought forward.

Strategy meeting to determine threshold for S47 enquiry.

S47 threshold met, and investigation undertaken lead by CSC and police.

S17 assessment

LADO referral


## Managing Disclosures from Children

Staff will know how to respond to the child appropriately when they make disclosures and know they in turn will be supported to process any challenges they may have. It is important to remember that a child has chosen to confide in you and want you to help them. Sensitive management of this will be one of the best opportunities to obtain more information to safeguard the child, but also shape their experience of making a disclosure and therefore support them to make further disclosure or not.

When making the initial risk assessment it is essential that we consider who is at risk, this may be the child making the disclosure or another child in or out of Oasis Restore. Considering our children are living at Oasis Restore and there maybe no immediate risk to our child in the case of a historical disclosure, they may have siblings or other children in the community who continue to be at risk.

If you overhear or see something that worries you, you should:

- Not ignore it.
- Intervene as outlined in the Critical Response Framework.
- Not feel silly – if it worries you, someone else needs to know. Safeguarding can be like a jigsaw puzzle: your little piece may be what brings together the whole picture.
- Speak to the DSL, or Deputy DSL immediately if the child is at risk
- Upload all information to Child Protection System and seek advice immediately from your DSL.
- Complete a report on Child Protection System if it is related to safeguarding, but not a child whose safety is immediately at risk inform your line manager
- Raise concerns directly with Children's Services if you feel an incident is not being dealt with appropriately, or if you are unable to locate relevant staff.



Every interaction  
matters

Concerns about staff in Oasis Restore should be made directly to the Principal Director/Registered Manager/DSL (or in their absence a Director (Care & Wellbeing or Learning/ Enrichment) and LADO processes will then take over.

If a child chooses to disclose something to you:

- Always listen carefully and quietly – do not press for information.
- Remain calm and reassuring.
- Thank the child for telling you and reinforce they have done the right thing by coming forward with the information.
- Show that you care through open and reassuring facial and body language.
- Do not interrogate or ask leading questions (it could later undermine a case). This does not mean that you should not ask any questions; rather that you ask questions that gently support the child to share their story (such as, how did that make you/others feel, can you show me (where/how/facial expressions, what happened next, who else was there etc).
- Ensure you take a written account (verbatim) of what the child has said. It may not always be possible to take notes as the child is sharing their account, but it is essential that as much as is possible we record:
  - An accurate record of the context surrounding the conversation (for example, was the child triggered in a PHSCE lesson or did they approach you randomly?)

- Their specific words used by the child to describe the body parts, any implements.
- Their specific words used to describe the alleged perpetrators.
- What questions you asked.
- The location and timeline of the alleged abuse (where children cannot remember try to narrow down by daytime/nighttime, school holidays, key life events, indoor/outdoor/smells – the smallest memory can sometimes really help)
- Frequency, it is really critical that we are mindful of the grammar used by children e.g. passive or active language.

Actions following concern or disclosure:

With the child:

- Explain that you must report what they have told you to ensure that they and others are kept safe.
- Reassure the child how brave they are and thank them for telling you.
- Do not accidentally blame a child in anyway such as 'I wish you had told me sooner'.
- Ensure the child is in a place they feel safe and with staff they feel safe with before leaving the child. Without sharing the details, let staff caring for the child that they may require additional support.

Procedurally:

- Immediately inform the DSL or DDSL verbally
- Complete a detailed report outlining what the child said and actions taken on Child Protection System. It is important that you are clear what the child has said as outlined above and then separately your analysis of risk that informs the actions/decisions.

Do not discuss details of what the child has told to anyone else before talking to the DSL/DDSL or another member of SLT.

Next steps will follow the safeguarding processes outlined in this policy.

It is important that both the child and staff member are supported through this process. Once initial actions have been agreed with the DSL, a plan will be implemented to support the child through the next steps including support through access to one-one therapeutic support, access to the sensory garden or activities that support the child regulate. Any staff member will be supported initially through debriefing and then via the DSL, clinical supervision, and their line manager.

## Allegations against staff

All allegations of abuse made against a member of staff in relation to a student must be brought to the attention of the Principal Director/Registered Manager and Designated Safeguarding Lead immediately. If the allegation meets any of the following criteria, the Principal Director (or other lead person) must report it to the Local Authority Designated Officer the same day.

Threshold is met for a referral to LADO in the following circumstances a member of staff (including a volunteer) has:

- *Behaved in a way that has harmed a child or may have harmed a child.*
- *Possibly committed a criminal offence against or related to a child.*
- *Behaved towards a child or children in a way that indicates he/she is unsuitable to work with children.*
- *Behaved or may have behaved in a way that indicates they may not be suitable to work with children.*

For other allegations or lower level concerns the Principal Director, Registered Manager and DSL will decide if further enquiries are required prior to referral to the Local Authority Designated Officer. These decisions will be made and recorded along with any actions take to make further enquiries including any advice from a LADO consultation. These decisions will be recorded and remain on a staff's file to identify trends or themes in low level concerns to enable support to be put in place and/or to inform a referral to LADO or disciplinary action.

Once reported to the Local Authority's Designated Officer they will determine if the criteria met and determine the next steps so that he/she can consult police and social care colleagues as appropriate. All alleged physical injuries must be investigated by the appropriate external agencies.

In some cases, allegations may be so serious, they will require immediate response by the police and or children's social care services. If this is the case the LADO team will also be informed.

Any allegations against staff that meet the threshold for LADO must also be referred to Ofsted which will be completed by the registered manager.

LADO referral process applies to all workers at Oasis Restore:

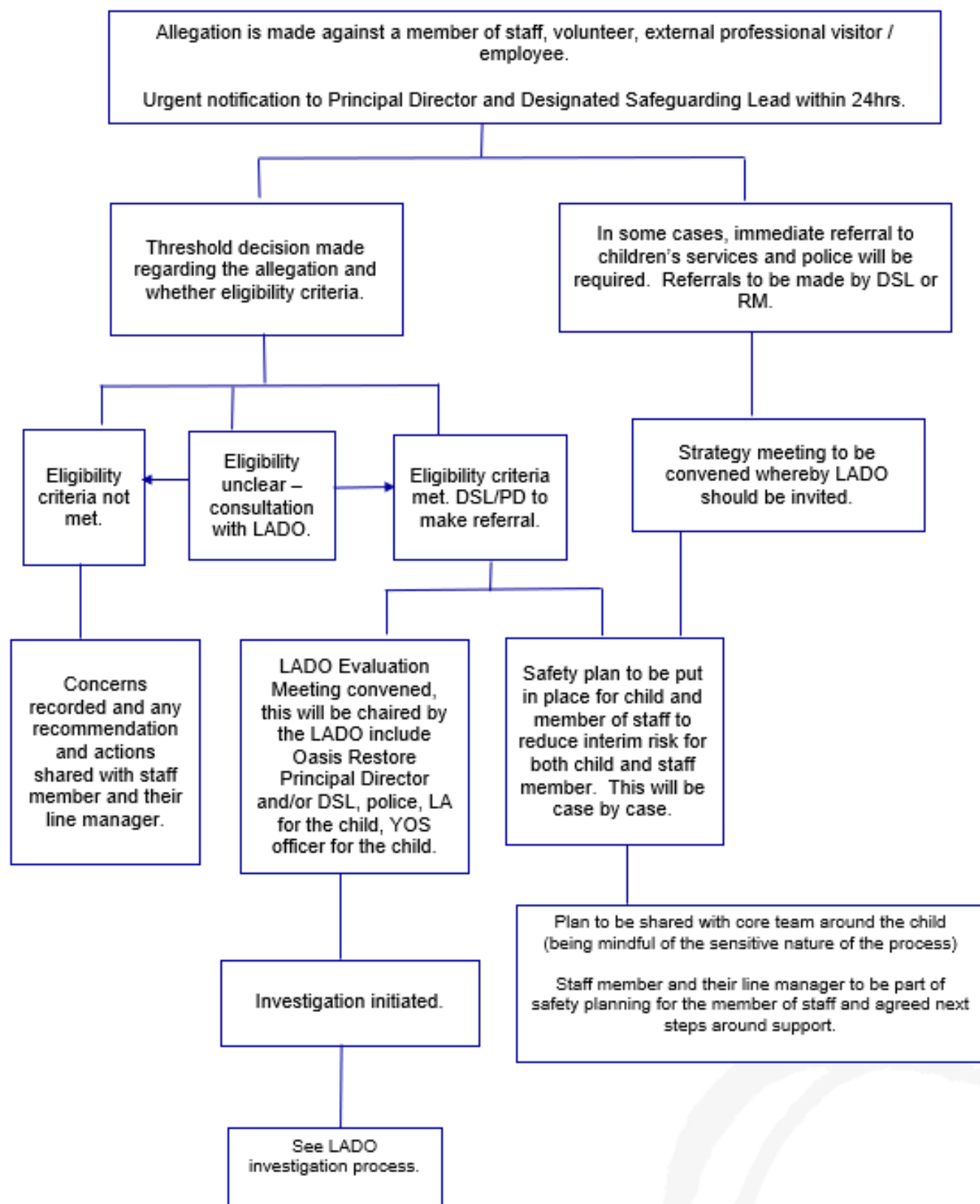
- Paid or unpaid
- Volunteers
- From an agency
- Commissioned Services.
- Casual or self-employed.
- Partner agencies coming into Oasis Restore to work with our children.

Historical allegations against staff that come to light after children who have left Oasis Restore will be investigated in the same way via the LADO process. Where the staff member has left Oasis Restore, we will support police in their investigation.

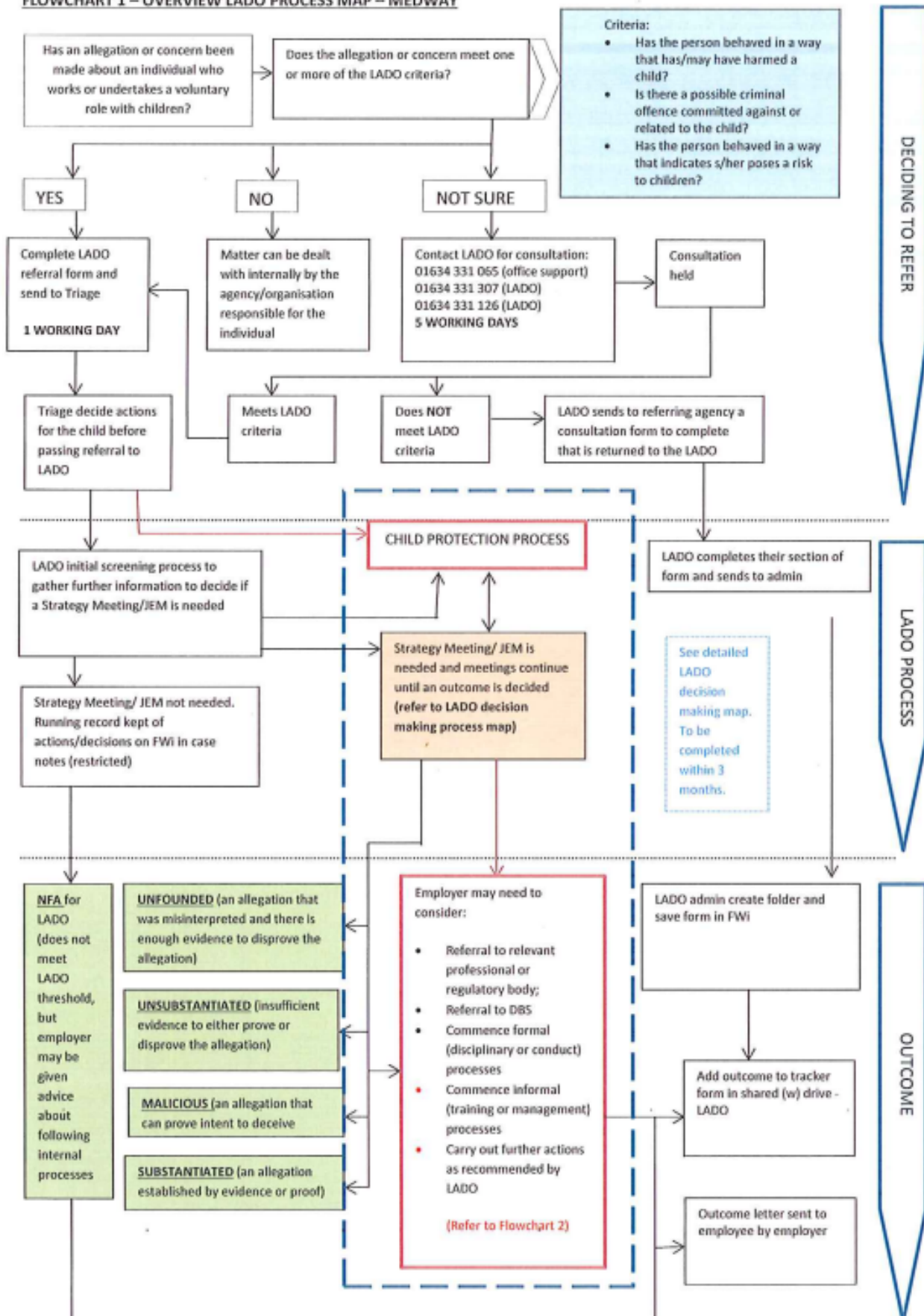
Where an investigation is required either to address lower-level concerns or as an outcome or as part of the LADO investigation this will be completed by a member of leadership who does not manage the staff member.

- Frontline staff – investigations will be led by a middle manager (House Managers, Heads of Department, Facilities Manager)
- Middle Manager – investigations will be led by a Senior Leader (RM, Directors, SENDCO, HoSO, HoST)
- Senior Leadership – Principal Director
- Principal Director – Chief Operating Officer.

## LADO Referral Process



**FLOWCHART 1 – OVERVIEW LADO PROCESS MAP – MEDWAY**



Alongside the LADO within the working day, all concerns and allegations should be raised with:

The Principal Director, Registered Manager, and Head of Safeguarding and Transitions (DSL) only - for allegations about a member of staff, including supply staff.

The Regional Director/ COO - for allegations about the Principal/Executive Principal.

The Chief Executive's Office - for allegations about the Regional Director/ COO.

Ofsted by the Registered Manager.

All LADO referrals will be recorded so that progress and outcomes can be followed.

Referrals to the Local Authority Designated Officer must be made within 24 hours of the incident. Once the referral has been received the Local Authority Designated Officer will have 3 to 5 working days to contact Oasis Restore. If a Local Authority Designation Officer agrees that the eligibility criteria is met a joint evaluation meeting is appropriate, they will arrange the initial meeting which will include the employer and all relevant multi-agency partners. Allegations should be resolved within 3 months. But in more exceptional cases they should be completed within 12 months.

Local Authority Designated Officer Admin - 01634 331 065

Local Authority Designated Officer - 01634 331 307

Local Authority Designated Officer - 01634 336 204

Download the following LADO resources:

[Local Authority Designated Officer Information Leaflet](#)

[A Guide to Managing Allegations Against Members of Staff](#)

[Flowchart to LADO Process](#)

[LADO Annual Report 2017-18](#)

Where the allegation or concern does not meet the criteria for LADO an internal investigation will be undertaken. It may also be that an internal investigation is the outcome of a consultation or referral to LADO. When internal investigations are required, they will be completed by a member of leadership that is not the line manager for the staff member, with the support from the DSL and/or RM. See below structure for investigations.

For frontline staff (teachers, Restore Practitioners, Deputy House Managers, Restore Networkers, Facilities team) investigations to be completed by middle management (House Managers, Head of Department, Facilities Manager).

For middle management (House Managers, Head of Department, Facilities Manager) investigations to be completed by senior leadership (Directors, RM, HoST, HoSO SENDco).

For Senior Leadership (Directors, RM, HoST, HoSO SENDco) investigations to be completed by the Principal Director.

For Principal Director investigations to be completed by COO.

## **Out of Hours**

If allegations about staff are made outside of LA working hours (5pm – 9am Monday-Friday, weekends and bank holidays) duty SLT should be notified. They will make any immediate safeguarding decisions with respect to safety for child and member of staff. This may include medical intervention, separation processes or suspension of staff member or alternative duty's (with OOH HR advise). Referrals should be made to LADO as outlined above (within 24hours) if SLT are unclear about the threshold for LADO they can seek further advise from Kent and Medway's Out of Hours Team on 03000 419 191.

Principal Director, Registered Manager and Head of Safeguarding and Transitions (DSL) should also be notified via email. Registered Manager will complete notification to Ofsted on the nearest working day to the incident.



### Multi-agency Working

Within Oasis Restore every child will have an integrated Core Team around them who will include a member of staff from education, health, their Lead Restore Practitioner and a further Restore Practitioner, their allocated Restore Networker, as well as their allocated workers from the community, youth justice worker and social worker.

We are committed to ensuring the positive relationships with partner agencies both within the school and externally. We will need to have a relationship through each local authority/ Council safeguarding team and partnerships/ boards. Within these arrangements, each authority will have its own arrangements for the front door (first point of contact for a referral). We will need to adhere to each process in place.

There may be safeguarding issues that are specific to the local area or population (where the child has been placed from) that need to be identified in partnership with the Multi-Agency Safeguarding Arrangements (MASA) and or other agencies such as gang membership, FGM, exploitation, extremism, and the safeguarding of vulnerable people. This is again a greater challenge for Oasis Restore as most of the children are from London, but also will arrive from the South East and other locations throughout the UK meaning we have a number of challenges across a wider footprint. The Restore Networkers will lead on building and maintaining relationships with our partners in particular contextual safeguarding leads in order to understand the localized knowledge and supporting to assess contextual risk for children as they arrive to and transition from Oasis Restore.

The standards for safeguarding need always to remain high. The Head of Safeguarding and Transitions (DSL) (or deputy DSL) is responsible for the whole school and home approach and is point of contact for all raised concerns, so we have a single point of contact. The Restore Networkers will operate a duty system and contact point for

professionals' partners and families during working hours to an accessible pathway for professionals to raise concerns, alongside contact directly with the Head of Safeguarding Lead (DSL).

Where multi-agency working is not successful, we will utilise escalation processes initially within the appropriate establishment and then with the Local safeguarding Partnership Board.

There will be a professional password agreed with the network to ensure that information is only shared with the agreed professional network to ensure safety of information about our children.

## Care of Children

### Legal status

All children living at Oasis Restore will be subject to an order from the courts that sanctions the restriction of their liberty and placement at Oasis Restore (or another alternative custodial setting).

Child's legal status also pertains to their care status and who holds parental responsibility for them. It is vital that we understand this to ensure that we are engaging with the relevant parties involved with respect to the care and transition planning for children's care.

See Appendix A for more details.

### Induction planning and prevention

All children arriving at Oasis Restore will initially stay in one of our Welcome flats for up to 12 weeks. This time allows us to get to know each child, complete assessments of their needs and understand their story and experiences. In this time the child's Core Team will come together and begin building relationships with the child. This team will consist of two Restore Practitioners, Restore Networker, a member of staff from health and education. This Core Team will remain allocated to the child throughout their journey in Oasis Restore. We will work with our external partners who know and have worked with each child prior to coming to Oasis Restore. This time, and the assessments will inform plan with respect to their care, health, education and transition, and create of one version of the truth of the child's journey. During this time, we will begin to understand the risks around each child not only in relation to any offending or alleged offending, but also begin to understand risk on a much wider spectrum. During this time, we will begin to understand each child's emotional wellbeing, mental health, childhood and parenting experiences, community tensions/risk, exploitation, and connected risk such as debt bondage, experiences of loss and trauma. This will inform the formulation and planning for the child's care and transitions. The allocated Restore Networker will complete safety planning work with the child during this time helping them in thinking about who at the school they feel most comfortable talking to, where they feel most comfortable and areas they feel may support them to re-regulate in times of distress and how might they communicate they need this with us through behaviour, safety word, action etc. (these may change as the child builds relationships and settles into the school and home and will be updated during formulation with the Core Team). During this time the Restore Networker will also work with the professional network and the friends and family for each child to ensure they also know how to tell us about any concerns they have for the child.

Most importantly, this induction period is the opportunity for the child to get to know and understand Oasis Restore. Some of our children may have been in the secure estate before, some may know others in or with experience of the secure estate and some with no knowledge at all. Each however, will likely arrive with a preconceived idea about the time they are with us but also their safety. Alongside this many of our children will arrive at Oasis Restore

experiencing high levels of stress, hypervigilance and in a state of fight or flight, in addition to mistrust of professionals and unsure about what their future holds. This time in induction allows us to create a culture of safety, bringing children along on the journey to understand the model of care, experience parts of the school day whilst they make choices about their education and enrichment pathways, build relationships with staff meet other children in safe ways. This will allow children to begin to see our model in practice and in turn slowly start to feel safe and trusted within the environment and in turn reducing the need to remain in a high stress and reactive state of functioning.

The Assessment and Formulation policy and the Restore Framework set out in detail the processes around initial assessments, formulation, and planning. This solid foundation aims to enable us to get to know the children, their strengths, and where they need support, and inform the children's plans. This knowledge and planning will support us to prevent incidents and escalation of risk by understanding children's experiences, behaviours, communication styles and triggers. Equally when there are incidents this in-depth knowledge of our children along with relationships with staff will support in the de-escalation of risk.

The knowledge and relationships built during this period will support in the placement of children into flats across the homes. Careful consideration will be given to a range of factors such as, age, maturity, sentence type and length. Where there are assessed to be increased risks for or from a child in relation to behaviours displayed these will be managed and considered within their placement into homes. For example, if a child is known to expose themselves, they will be placed in a first floor flat to reduce risks associated with a ground floor room.

## Health Care

All children will have access to a GP, dentist, and wider healthcare services such as sexual health throughout their stay at Oasis Restore. Understanding children's medical history and physical health is essential to their ongoing care and wellbeing as well as their safety. We will work with the child, their professional networks and family to understand children's medical history and how we can meet their ongoing medical needs. This knowledge is essential to ensure that we are safely meeting children's health needs and ensuring that we can respond in times of medical crisis. We have an accessible bedroom for children who may require this due to their physical health needs or for those who may have injuries requiring this additional support. For those children who have specific medical needs they will have a healthcare plan to support in administration of medication, review and an emergency response plan in the event of a medical emergency.

All children will be engaged in a discussion regarding their sexual health and where appropriate offered health advice and testing. This will be voluntary. This will include offering a pregnancy test to female children as appropriate allowing us to safeguard both the children in our care and any unborn baby to support with their care and wider planning, including access to therapeutic support, anti-natal care, and physical health needs surrounding pregnancy or decisions around continuing their pregnancy. Whilst all children will reside in single sex flats testing on arrival also allows us to determine conception prior to arrival at Oasis Restore. Should a child become pregnant during their time at Oasis Restore, this would initiate an immediate safeguarding response.

It may be that children enter Oasis Restore with substance misuse challenges. Children will be given the opportunity to talk to staff regarding this during their induction and beyond. Where any issues arise support via our health team, and therapeutic offer will be implemented to support the child's immediate health and emotional wellbeing needs. Wider concerns pertaining to substance misuse issues will also be considered by the allocated Restore Networker such as risk of children attempting to access substances in the school through attempting to get substances brought into school or trying to find alternatives. Alongside potential community risks such as debts.



No one size fits all

Internal secretion (swallowed, anally or vaginally secreted) of unauthorised items can be a common way for drugs, phones, and weapons to be conveyed into custody. This carry's a significant health risk for anyone secreting items in this way. Where we suspect this an immediate discussion with duty SLT, DSL, and health is required to ensure the appropriate support is in place to reduce risk and prevent physical health complications. In addition, a safeguarding response is required to ensure that we are protecting children, families involved and considering the wider risks surrounding this.

## Mental Health

Oasis Restore has an important role to play in supporting the mental health and wellbeing of our children and it is anticipated that the process leading up to the child coming to Oasis Restore, and their adjustment to being there, will cause some level of distress for all children that may be displayed in their behaviour, attitude, or wellbeing. Our induction process allows children up to 12 weeks to adjust to this life-changing experience, build relationships and begin to feel safe in our care. Our assessment and formulation process will enable us to begin to understand one version of the truth with respect to the child's life experiences, any previous concerns about mental health, and previous and current strategies used by the child in times of stress or upset. This will support us to plan and work closely with each child the Core Team and their family to manage their care safely.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We will have clear systems for identifying and reporting possible mental health problems. All children will have an allocated Core Team who will work closely with the children and each other to identify changes in children's emotional wellbeing at the earliest opportunity and offer support.

It is important that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, all our staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing an emotional or mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, grief, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children's experiences, and their high prevalence of special educational needs and mental health needs, can impact on their behaviour and education.

Within the context of the secure estate, we are conscious that self-harm is prevalent and robust support and assessment is required to ensure that all children are safe. Our Restorative Policy outlines the response to self-harm whilst acknowledging the complex reasoning and risks surrounding it and sets out how we aim to work with and safeguard children displaying these behaviours. We are aware of the vast variation in how self-ham is displayed and staff will be trained and supported to identify risk of and self-harm behaviours.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by reporting via our child protection systems their concerns and speaking to the DSL or Deputy DSL straight away. Where we have concerns about a child's mental health this should be immediately shared with the DDSL/DSL, and the Core Team for the child to ensure there is a support plan in place to assess and manage any risks as well as support for the child. This is outlined in detail within the Restorative policy. Where there is assessed to be an immediate risk to a child as a result of their mental health, such as self-harm or suicidal ideation we will have access to support onsite from our health team. Plans to safeguard the child will be put in place immediately. This may include increased levels of observation and therapeutic activity. Where there are concerns that the child may need hospitalisation as a result of their mental health, we will work with partners to arrange this assessment.

## Working with Families

All children will have family and friends that are important to them, where safe we are committed to promoting and supporting this contact time for all children. On arrival at Oasis Restore we will prioritise working with the child and the professional network to establish who these people are and any potential risks. The allocated Restore Networker will contact each family member / friend and where possible will aim to meet each person who is important to the child with a view of beginning our relationship with them. The Restore Networker will discuss who we are, what life will be like for their loved one in Oasis Restore how they can contact us if they have any worries or questions, what to expect on contact (phone/video and in person) including what they can/can't bring with them, and should there be any concerns/risks there will be an honest conversation so we can manage these together. There will be a family password agreed with the family to ensure that information is only shared with the agreed family/friends to ensure safety of information about our children.

Oasis Restore has 4 designated family rooms, one which has a living dining and kitchen area, two that are designed to mirror living and dining areas, and share a kitchen area, and one which is a more controlled setting for higher risk contact. These areas are designed to support the relationships between children and those that are important to them to be safely maintained, and for children to be able to showcase their progress and make positive memories with their loved ones. Family therapy, offered flexibly and responsively, is a key part of our offer.



It takes a village

Children will be able to have contact through their media panels with their friends and family. We will have the facility to record phone communication between children and their family and friends, the decision to record any communication will need to be agreed with senior leadership. Recordings can be accessed by police under the legislation set under Regulation of Investigatory Powers Act 2000 (RIPA).

All children will have an agreed contact and visitors list authorised by the allocated youth justice worker as per the case management guidance. Oasis Restore will work to support all contact so long as this is safe and in the child's best interest. There may be circumstances where contact is directed by family courts or pre-existing court orders, where safe this will be adhered to. All contact will be supported by our Restore Practitioners/Networkers who will provide support and where required supervision to ensure the safety of all in attendance. It is envisioned that this time can be used as an opportunity for children to maintain, build and where needed repair relationships with those they care about.


It is understood that visiting can be a high-risk time for unauthorised items to be brought onto site, mostly commonly drugs and phones. Unauthorised items being brought onto site can be a significant risk for children and staff and can mean the continuation of risk and exploitation of our children and others. To reduce this risk to our children and their

visitors Restore Networkers will contact and explain the expectation around visiting our children to their visitors. We will also be undertaking a search as visitors arrive alongside intelligence led swab drug testing.

Family contact will often be a highly emotive time for children and their family. Core Teams will closely monitor the children's emotional presentation, behaviour and wellbeing leading up to during and after visits to understand the impact of this on each child. We will look to identify patterns both positive and challenging surrounding visits to enable support to be in place to enable visiting to be as positive as possible.

## Education

All children who come to Oasis Restore will have a bespoke curriculum designed to meet children where they are and support them to meet personalised goals and targets. Class numbers are small with a teacher and a higher learning teaching assistant, along with Restore Practitioners in the corridor and available to the classrooms if needed. This is in place to enhance each child's experience and ability to engage in education. The information gathered during the induction period will support the engagement of children in their learning journeys, including the completion of risk assessments, and updating these frequently with the child and the Core Team.



Start where the  
child is

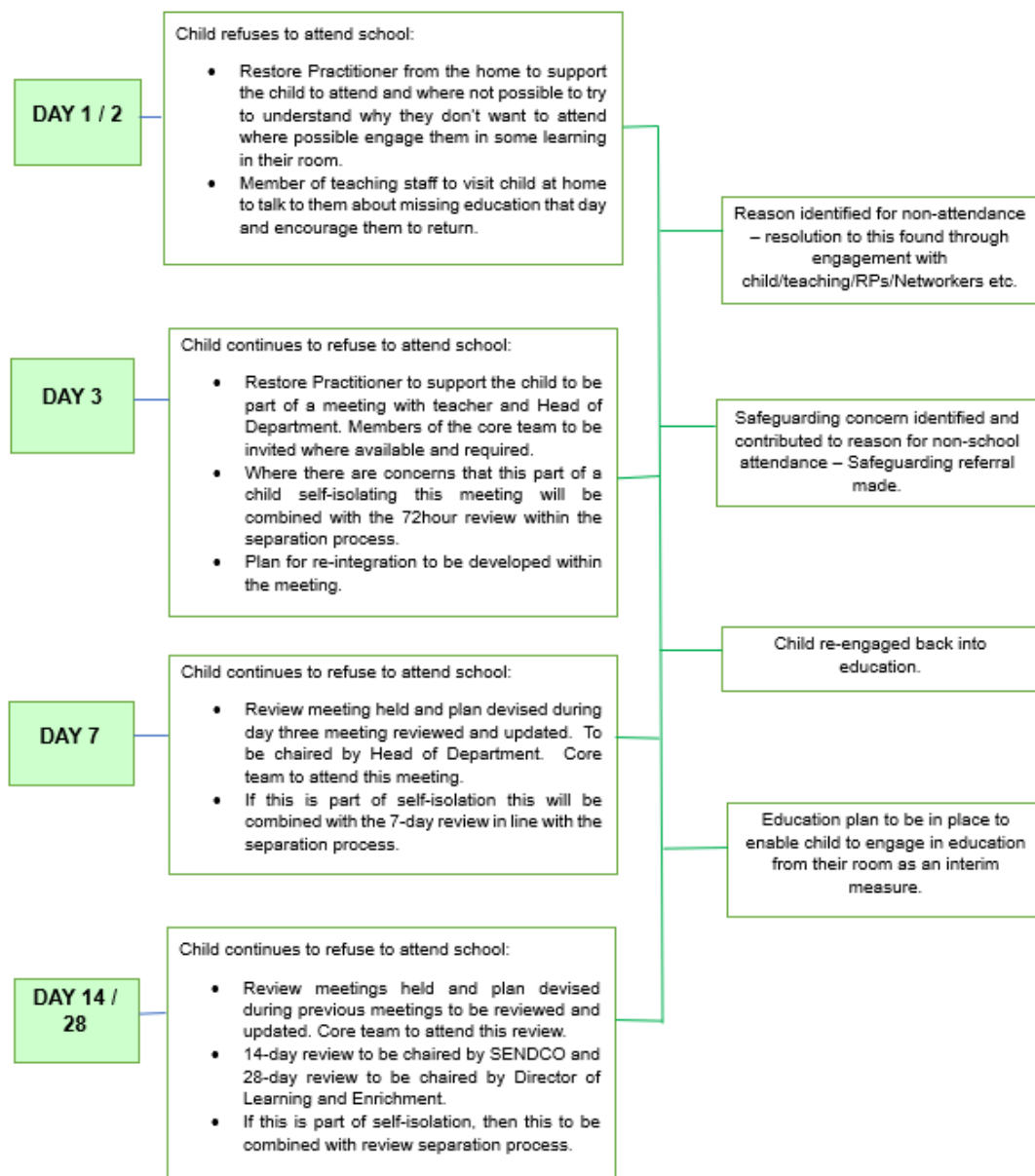
Children will have access in classrooms to items which are or have the potential to be dangerous. There is likely to be a higher risk in the vocational subjects and children will be risk assessed as part of admission onto this pathway. Each classroom will have a risk assessment with processes in place to mitigate risk as much as possible such as shadow boards, counting in and out of items. Each school building will have a searching wand if searching is deemed necessary.

## Missing from Education

When children start their journey at Oasis Restore, they will have had a varied range of educational experiences. In Oasis Restore we have high aspirations for our children to thrive in every aspect of their lives, our learning and enrichment offer is key to achieving this, and their attendance and engagement in their chosen pathways is vital. We understand that there will of course be times where children cannot engage due to attendance at court or sickness which will be managed and supported by the formulation plans and health care team. There will also be times where due to a behavioural incident in school a child may not be able to participate in a class until a participation review has taken place to ensure a child and others safety in a classroom. Should this exceed three school days a separation review should take place with the child and their Core Team as outlined in the Separation section of this policy. Where children are missing from education, and this is not due to court or sickness we firstly need to try to understand why the child does not wish to be in education. Refusal to attend school will trigger the missing from education process.

## Missing from Education

The aim of this process is always to get the child safely back to education as quickly as possible, but we understand that there may be many things that are acting as a barrier for children to access school. This process allows for opportunities for children to express what may be going on for them whilst also maintaining our high aspirations for our children.





## Care of Young Adults

Once children reach 18, they are currently remaining in the youth secure estate until their 19<sup>th</sup> birthday unless there are exceptional circumstances to expedite a transition to the adult custody estate. Therefore, children who have received a sentence and are due to release before their 19<sup>th</sup> birthday or due to the length of their sentence will be transitioning to the adult estate will remain at Oasis Restore until their 19<sup>th</sup> birthday. Either to be released if their sentence ends before they are 19 or they will be transitioned to the adult custody estate as per the Transitions policy. As a result of this arrangement, we will have children residing with our young adults at the school.

When our children turn 18, they will legally be an adult. It is important however to acknowledge that the mixing of adolescent children and young adults very much mirrors our community where adults and children normally mix in schools, homes and communities. Therefore, the care of our 18-year-old young adults will not differ from when they were 17; they will still access the same education offer, care and enrichment. In readiness for our children's transition to adulthood we will initiate an updated assessment at 17 and 6 months to 17 and 9 months. This assessment will include consideration of any risks that relate specifically to the transition from 17 to 18 and risk to children as a result, as well as work with the child to help them understand the legal changes in becoming an adult, what this means for them and others, both within Oasis Restore and in the community.

Should any risks arise from ongoing formulation or risk assessment around a child's transition from 17 to 18 other for them or others, consideration to transition them to the adult estate in line with the exceptional circumstance pathway will be given.

## Care of younger children

Along with our older children we may also have 12- and 13-year-olds in our care. We are mindful about the significant differences in the needs for a 12- or 13-year-old to a 16- or 17-year-old and we are mindful of the challenges in mixing this broad range of children. Whilst this cohort of child is likely to be in the minority, we consider the additional safeguards required to safeguard our younger cohort. The first step in safeguarding the younger cohort of children within the youth secure estate is through placements who will initially assess whether the school is best places to look after each child.

Our statement of purpose sets out our care arrangements for all children including our younger cohort. Our induction and formulation process will inform our decision for each child and how they are matched appropriately to a home and their educational pathway to ensure they are safeguarded within an environment of predominantly older children. Any safeguarding concerns or risks identified through this process will be included within the planning for them and reviewed in line with the formulation process. Where possible our younger children may benefit from a peer mentor as a network of support through a programme of community guardianship within the homes.

Our Restore Framework and focus on Relationships, Discovery and Community aims to integrate all children regardless of age, creating a culture where children learn to live alongside each other. Challenges within the home that may come through competing needs, differing levels of maturity and behaviour will be addressed through Community Meetings and a shared learning about each other and shared consequence. This process will support all children living in the home to find their way of living together.



## Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate communications and online material. As such, Oasis Restore ensures appropriate procedures, filters and monitoring systems are in place in accordance with the following policies:

- Oasis E-Safety,
- Web Filtering and Smooth wall Device Monitoring.

All children will have access to the internet in their rooms and school. To ensure their safety our firewall will block all content unless added to an approved list. This significantly reduces the risk of online engagement. However online safety will be explored as part of their enrichment offer and transitioning planning. Filtering will be provided to the extent that is possible within the technological constraints. Where Oasis Restore is providing Wi-Fi this will also have the desired security settings. Children will be reminded of Internet Safety rules. Staff delivering teaching online should listen for any cues that indicate a safeguarding concern and report these to the DSL as soon as possible.

All staff devices will remain on the school site. Those staff with allocated devices will keep these outside the secure perimeter unless permission is given by Principal Director or Registered Manager. Staff will not be allowed mobile phones, laptops, smart watches etc onto site to reduce the risk of authorised contact, harm, or communications.

It is however important that children are supported and equipped with the skills and knowledge of technology and online safety as when they leave us, they will be entering a world that is ever changing and technology is central to day-to-day life.

## Care of Girls

Oasis Restore is a mixed provision and therefore we will have both boys and girls in our care. Our flats will be single sex and the care arrangements are set out in our statement of purpose. Whilst all bedroom windows will have privacy film, and curtains used to increase privacy for children in their bedrooms, girls will be placed in first floor flats to increase privacy.

We are mindful that whilst caring for girls, most of our children will be boys and therefore girls will be outnumbered. The impact of this will likely depend on each child, their experiences, and relationships with boys. As with all children their identify and needs will be individually considered as part of the placement decision made by the Youth Custody Service, and once placed within the induction period we will consider the impact, timetable, enrichment activities etc to ensure that our children are cared for and feel safe.

We will work to understand their needs in relation to menstruation and their experiences, patterns and needs around this time. We are aware of the increased levels of self-harm within the female population in custody and have a robust care package for all our children should this be identified as a concern.

## Care of children with additional health needs and physical disabilities

As children are placed at Oasis Restore the placements team will consider the needs of each child and whether we can safely meet their health needs including physical disabilities. Oasis Restore has a fully commissioned health team on site including an on-call GP, school nurse and mobile dentist who will work as part of the Core Teams for children to ensure their health needs are met. This team will be responsive to the needs of our children.

During the induction period we will gather all information from universal and, if appropriate, specialist health services, as well as consult the child, family and professionals who know the child best to understand the child's health needs. Where children have a medical condition requiring treatment and/or medication this will be managed

on an individual basis. These plans will consider the needs of the child but also the potential risk to other children for example access and disposal of medication or sharps.

For children who have physical disabilities the placement team will determine if their needs can be met at Oasis Restore based on our offer outlined via our statement of purpose. Any child with a physical disability will have as part of their induction a plan in place considering any reasonable adjustments that may be required to ensure they can fully engage in life at Oasis Restore. Our health team and SENCO & Head of Inclusion will be crucial in supporting with the development of this plan and support. We have one bedroom that is DDA compliant to accommodate a child with physical disabilities or health conditions that require greater space and accessibility.

## Care of children with special educational needs

Children with disabilities, particularly those with a history of displaying distressed behaviours, face a higher risk of abuse. Other vulnerable groups include children with learning differences, speech and language difficulties and those with health-related conditions. (Miller and Brown, 2014).

Several factors contribute to the increased risk of abuse for children with SEND; Communication barriers may pose challenges for children with speech, language, or communication needs, making it more difficult for them to share concerns with adults. Misunderstanding signs of abuse is also common, as adults may mistake indicators for signs of the child's disability or needs. Lack of education on staying safe, especially in personal safety and relationships and sex education, further complicates matters for children with SEND. (Garbutt et al, 2010). Lack of appropriate support, both in terms of understanding and responding to safeguarding needs, adds to the difficulties faced by abused disabled children, who are less likely to disclose abuse and may experience delayed reporting compared to their non-disabled peers (Hershkowitz, Lamb, and Horowitz, 2007).

We specifically work to safeguard children with SEND by:

- Ensuring the Restore Plan and formulation processes provide detail on the child's disability/needs and detailed guidance around their preferred method of communication.
- Staff safeguarding training includes specific factors that increase vulnerability to harm relating to children with SEND and ensures staff avoid explaining away potential indicators or abuse because of the child's area of need or disability.
- When making a referral or communicating with external partners about children with SEND; we ensure the child's needs are evidenced, clear and acknowledged by everyone involved.
- Providing flexibility in the way children communicate with staff and how we communicate with them, to ensure that they feel heard throughout any potential disclosure and subsequent support.

## Care of children who identify as transgender.

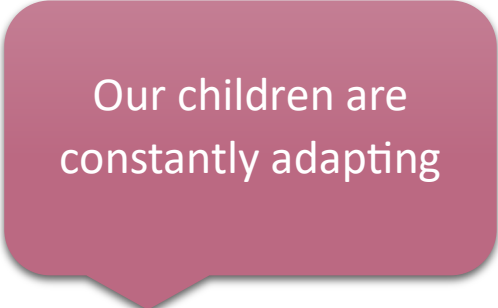
Oasis Restore is committed to caring for and meeting the needs of all children in our care. Should we have a child/children placed with us who identify as transgender we will manage this on a case-by-case basis. We will use our 12-week induction period and formulation process to consider the best way to provide safe and inclusive care for them. This will include where they should live with respect to the flat, and home they are placed in, safeguarding themselves and other children, and any additional support they may require whilst they are living at Oasis Restore.

## Care of children who are parents

It is likely that we may have children in our care who are not only children but who may also be parents. Oasis Restore does not have a provision that allows for children to be housed with their parents, nor does any provision within the youth custody estate.

Consequently, we are aware of the significant impact this separation may have on our children and their families. All children will have access to emotional and therapeutic support whilst living at Oasis Restore.

The Core Team will work closely with the professional network around both the child (parent) who is living at Oasis Restore and any professionals for their child in relation to safely promoting contact. Where safe contact will be promoted and encouraged through letterbox contact, phone/video calls as well as in person contact. During family visiting our visiting rooms will be set up like living areas allowing parents to as much as is possible be a part of learning their child's routines, such as feeding, changing etc and play, in readiness for future transition and care.



Our children are  
constantly adapting

It may be that in addition to criminal proceedings, our children are also undergoing family court proceedings either private or public with respect of themselves or their children. This is a highly challenging and stressful time for any parents and is significantly exacerbated considering them being children and either subject to remand or a sentence. All children will be supported both in attendance at court with a member of staff from Oasis Restore as well as a clear plan of therapeutic and emotional support during this process. Oasis Restore of course is committed to supporting the legal process and will support with enabling family contact, court directed assessments etc.

## Separation and Isolation

In most circumstances, risk will be managed through an urgent formulation meeting with the child's Core Team from which an updated safety plan and support will be implemented. Community Meetings will, where appropriate, explore reparation and reintegration. Guidance and support around these plans and support will be available via the Head of Safeguarding and Transitions and Registered Manager. The key principle will be to restore them to full integration with peers and the wider school community as soon as is safe and manageable.

Whilst children in our care will be deprived of their liberty by virtue of the court order sentencing or remanding them into our care this does not mean that we can without further legal provisions restrict their liberty further and indefinitely. Whilst the child's and others safety are our priority, we also need to ensure that all actions to safeguard them are done within a legal framework and are proportionate to the assessed risk. We therefore will consider at each review along with all aspects of the child's care any need for legal orders to ensure a child's safety in line with the support and guidance from the child's home authority.


Definitions:

- Separation:
  - Where risk is assessed as so high that we cannot keep a child either with another child or children
  - Where risk is assessed as so high that a child cannot engage safely in all or part of the school day including enrichment and daily routines in the home.
- Self-Isolation
  - When a child isolates themselves from other children, activities, or their routine altogether.
- Additional Liberty Restrictions
  - Any additional restrictions that impact on a child's freedom and liberty within the context of the school. For example, constant watch or increased observations.

In circumstances where a higher level of risk management and intervention is required that could be deemed as a further restriction on a child's liberty, or whereby we are deciding to maintain separation of a child or children from each other and/or their daily/school routine we will follow a formal review process. We will also follow this process when a child is self-isolating. Every review should consider whether the restrictions can cease or reduce.

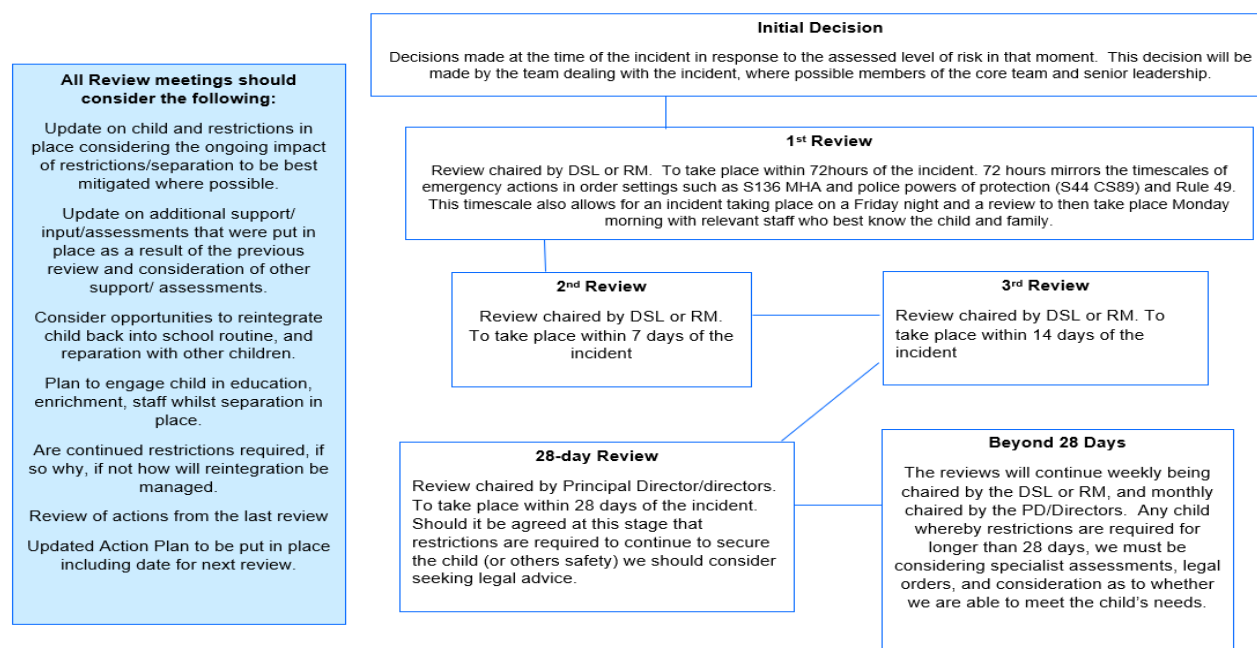
Whilst reviews are scheduled in line with the below process a review can be requested at any stage to ensure timely decisions in a child's best interests. However, these formal review timescales are in place to ensure that effective oversight is in place to maintain a child's safety but also maintains a child's right to liberty within the context of the school.

At each review point a defensible decision form will need to be completed/updated to ensure a clear evidence base to the decisions is held. This should include the views of the child, family, Core Team for the child, senior management, and Principal Director. This will ensure a clear line of accountability and responsibility of decision making.



Safety through  
connection

## Separation, self-isolation and additional Liberty Restrictions Review Process.



## Threat to Life Notifications

Threat to life notifications are also known as an Osman warning, named after a 1998 legal case of Osman vs United Kingdom which was heard by the European Court of Human Rights. However, the term in some areas is now known as a threat to life warning.

A threat to life warning is:

- A warning of a death threat or risk of murder, issued by the British police or authorities to the prospective victim.
- They are used when there is intelligence of the threat, but there is not enough evidence to justify the police arresting the potential perpetrator.

This is a risk at Oasis Restore. The Principal Director and Senior Leadership Team will manage and plan for all children falling under the threat to life warning. This will be treated as a high-risk incident as outlined within the Critical Response Framework. Our ability to work with the Police, Social Care and the Youth Custody Service will be critical and will also need to be considered as part of any transition planning.

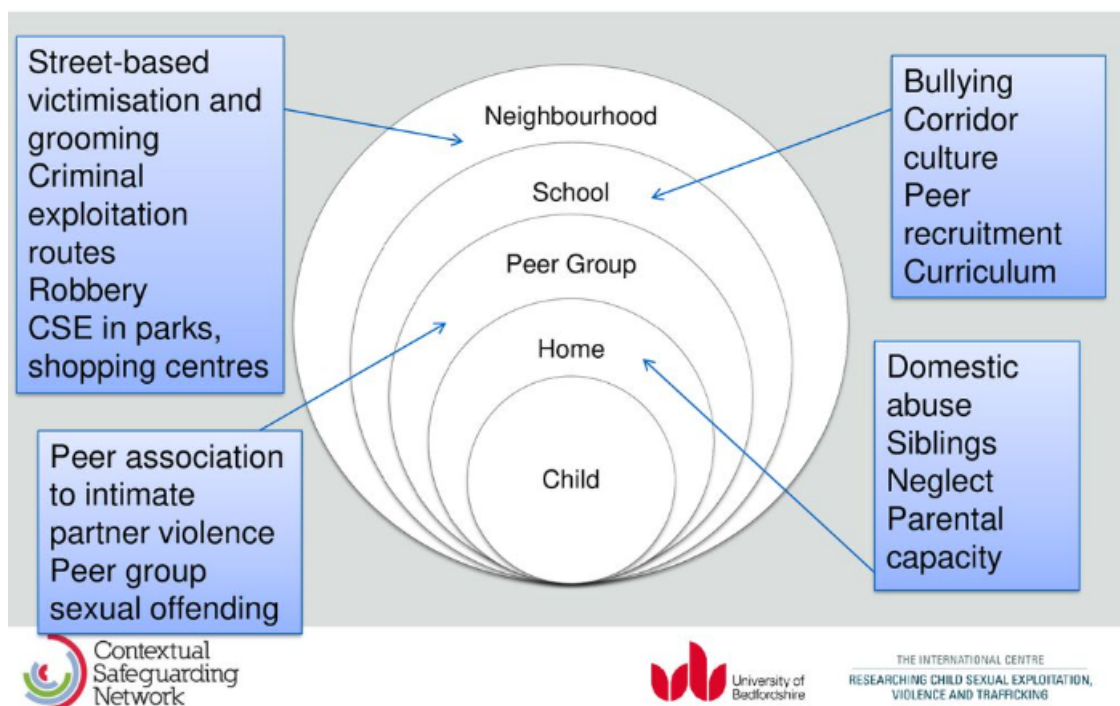
## Co-defendants

It is anticipated that co-defendants are likely not to be placed together at Oasis Restore in light of our model of care and intentions to mix children in education and enrichment. If co-defendants are placed at Oasis Restore and orders are in place that prevent co-defendants mixing, the induction period will be utilised to design bespoke timetables that enable each child to engage in all aspects of the school.

## Contextual Safeguarding

Contextual Safeguarding has been developed by Dr Carlene Firmin at the university of Bedfordshire's Contextual Safeguarding Network. Contextual Safeguarding looks beyond the child/ren to consider the context and systems in which abuse takes place. To achieve this, we need to not just focus the safeguarding on the child who has experienced abuse but target the context in which the abuse took place. We need to assess what happened in the location and the relationship between the location and the child. This must be done through the lens of safeguarding not through reduction of incidents and crime.

In Oasis Restore we will assess risk not only in relation to our individual children, and their experiences, behaviours etc but also the school as a community, applying the principles of contextual safeguarding within Oasis Restore. During the induction process the Restore Networkers will work with children to around their own safety, but also around developing a commitment to community guardianship. Each child will be supported to take on their part in creating a safe community, considering how they can tell staff if they are worried about another child, or see something that worries them or even just have an instinctual feeling, as well as proactive steps to create a safe community. This will be mirrored within staff training and induction and our work with children's families and professional networkers.



## Exploitation

Exploitation in all forms is abuse, exploitation occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child (or adult) into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may be accompanied by violence or threats of

violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Exploitation comes in many forms and is commonly categorised into 4 key elements outlined below. It is essential that we remember that each element does not only exist in isolation and often there can be multiple forms of exploitation taking place simultaneously.

### **Criminal Exploitation**

Criminal Exploitation is a broad term used for any form of exploitation that involved victims being involved in criminality. It is commonly associated with gang affiliation and county lines, it is however also linked to a much wider range of criminal behaviours: financial crime such as “squares”, robbery, youth violence, burglary, forced labour etc.

Criminal Exploitation is often seen as children making “bad choices” or children being seen as “in with a bad crowd” and the exploitation is often missed consequently. There is also often a significant gender bias in relation to criminal exploitation and it is often associated to boys, which has an impact on us missing other forms of abuse for boys but also missing this form of exploitation for girls.

### **Sexual Exploitation**

Sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Child Sexual Exploitation does not always involve physical contact as it can occur through the use of technology. This can affect any child or young person (male or female) under the age of 18 years. The age of consent is immaterial in CSE – it is child abuse.

Like with criminal exploitation this is complex and often children are described as being “sexually active” when in fact they are being exploited. Sexual exploitation is never consensual, even if the child never said no. The power and control over them supersedes the perceived consent and means that their capacity to say no is greatly impacted and comes with huge consequences for the child. Whilst sexual activity is common through adolescence it is vital that we remain alert to indicators of sexual exploitation and that we support children to understand healthy relationships and signs of exploitative behaviours from potential exploiters. As with criminal exploitation there is commonly a gender bias of sexual exploitation being an issue for girls, and often this leads to us not identifying this abuse for boys.

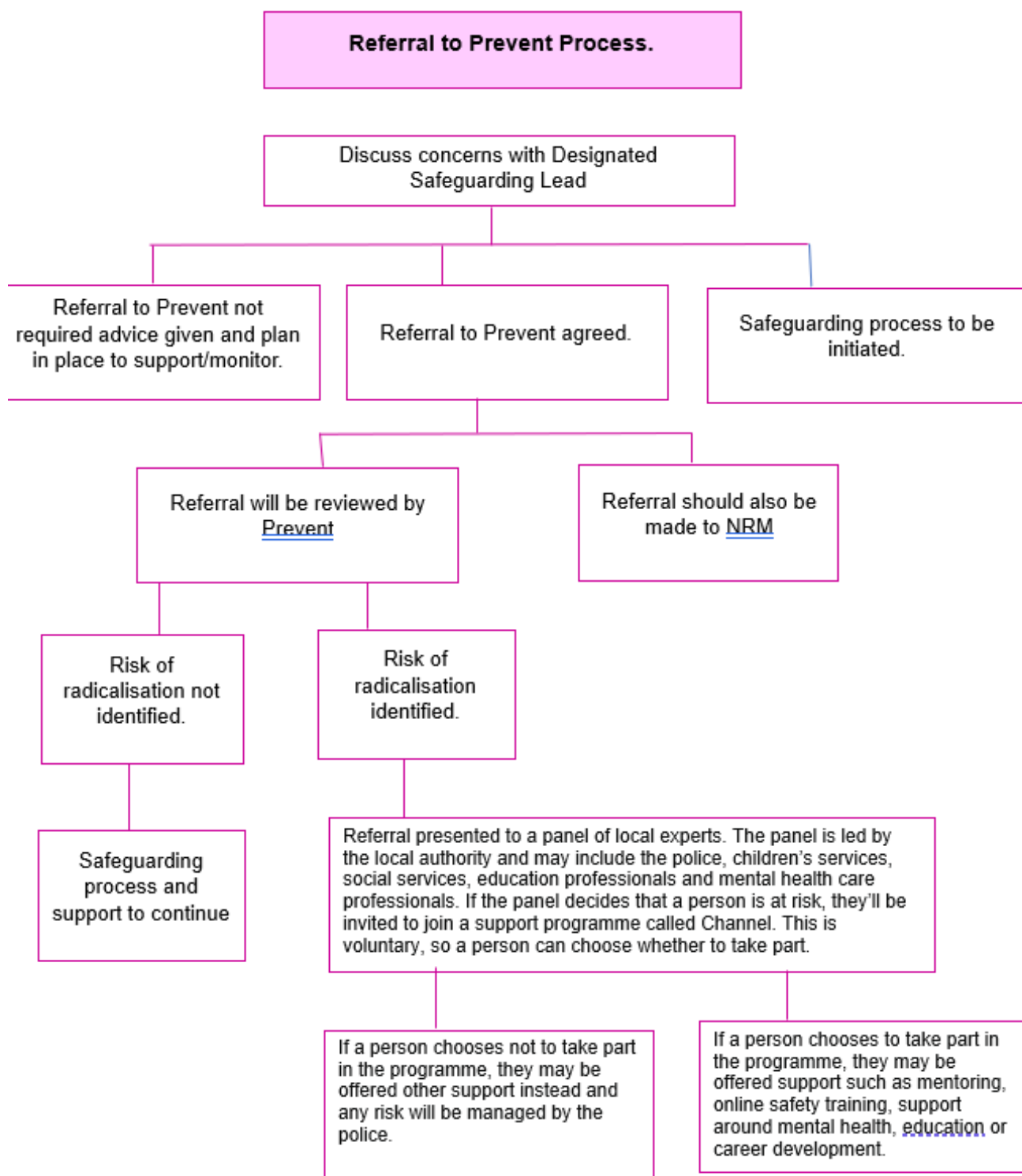
### **Human Trafficking and Modern-Day Slavery**

Human Trafficking is the movement of a person from one place to another for the purpose of exploitation. This movement can be locally, nationally, or internationally. Trafficking is often used for movement of children and adults for criminal and sexual exploitation, forced labour, and organ harvesting.

### **Radicalisation**

Radicalisation is the process in which a child or adult is coerced into adopting radical positions on political or social issues and comes to support terrorism and extremist ideologies. In the UK the most common forms of terrorism are extreme right-wing terrorism (inspired by groups such as National Action and Atomwaffen Division) and Islamist terrorism (inspired by groups such as Daesh or Al Qa’ida). Where we have concerns about radicalisation we must refer to Prevent as part of our safeguarding response.





## Mechanisms used to Exploit Children

Debt bondage is a significant risk for children and their families and is a strategy to. Debt bondage is used to tie children into a cycle of exploitation. A debt is accrued, that the child is then expected to pay off through any form of exploitation: criminal activity, sexual abuse, forced labour etc. This debt can be accrued in a number of ways some of which are outlined below:



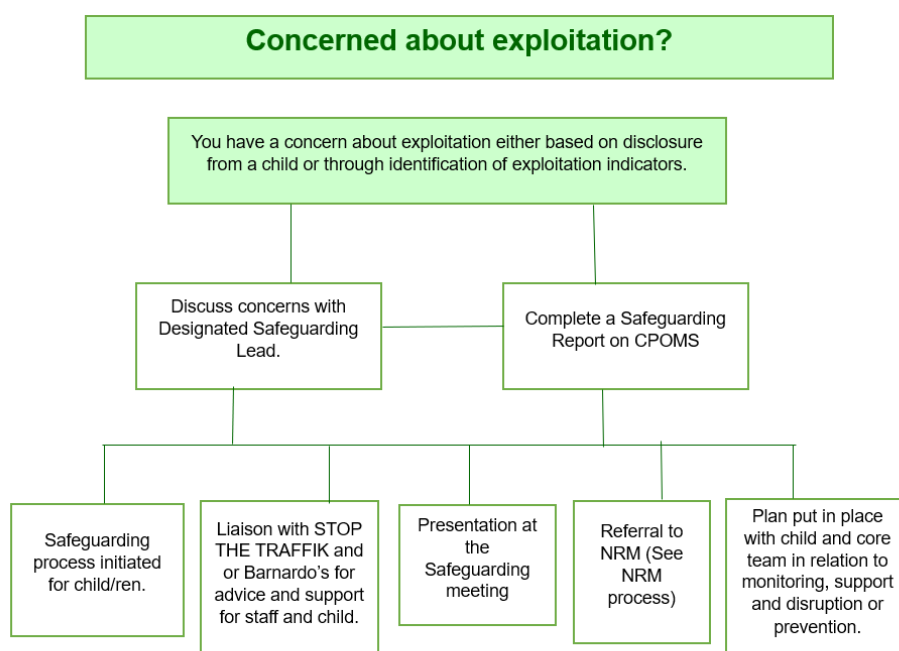
- Children are addicted to a substance (often part of the reason they are exploited) and then use the drugs/spend the cash.
- Children are set up to be robbed by those exploiting them leading to the debt.
- Children are robbed.
- Paying back debt accrued from trafficking – commonly seen with international trafficking victims who are exploited by those who facilitate them arriving in the UK and are forced to “pay back” an undefined debt.
- Confiscation of drugs/money by police as part of an arrest can often lead to children being in significant debt. Whilst professionals around them feel there is safety due to police intervention and removal of drugs sadly the risk has increased as children now owe their exploiter for the loss. This may be a common issue for children entering into custody where they may now have significant debts that they are expected to pay off either whilst they are in custody or upon release.

Push and pull factors are often relied upon by adults wishing to exploit children.

- PUSH Factors are things that push them away from the home increasing risks and opportunity for exploitation, for example abuse, poverty, poor relationship, low self-esteem, unmet needs.
- PULL Factors – factors outside of the home that pulls children further into exploitation and away from the home, attention, love, gifts, money, promises of change in life circumstances.

These can often intertwine, and factors can act both as push and pull, for example poverty, push being a sense of responsibility to provide for self or their family. Pull being the ability or opportunity to have access to money, provide for self, family, fit into social norms within peer’s groups etc. These factors are often used as part of the grooming process. CEOP 2022 define grooming as involving *“the offender building a relationship with a child, and sometimes with their wider family, gaining their trust and a position of power over the child, in preparation for abuse.”* Grooming often leads children to develop a deep sense of loyalty for those that exploit them. This can also be borne out of shared (or believed to be shared) experiences and trauma, children believing that no one else would understand or they were there for the child when it felt like no one else was.

### What do we do when we are concerned about exploitation?



The Registered Manager will determine if an Ofsted notification is required for any safeguarding concerns linked to exploitation.

### **National Referral Mechanism (NRM)**

The NRM is a framework for identifying potential victims of human trafficking and modern slavery, ensuring that they receive appropriate multi-agency support (Established in 2009). Child trafficking and modern-day slavery is child abuse. When an agency encounters a child who may have been trafficked or victim of modern-day slavery, Children's Services and Police should be notified immediately. All children, irrespective of their immigration status, are entitled to protection, from the exploitation itself as well as legal protection from prosecution for offenses committed under duress.

There is a mandatory reporting duty with respect to trafficking and modern-day slavery through the NRM process. The NRM recognises the risks of exploitation and the impact of control and coercion that forms part of this. It should be considered in all cases of exploitation, as all can be considered a form of modern-day slavery and often involve trafficking. It is important to remember is that the threshold for reporting is suspected exploitation you do not need to prove the exploitation.

Consent is not required to make an NRM given the mandatory reporting duty. Whilst openness with children is best practice consent should not be a barrier to the referral being made.

First Responders are authorised as professionals who can make NRM referrals these organisations are;

- Police forces
- certain parts of the Home Office:
  - UK Visas and Immigration • Border Force
  - Immigration Enforcement • National Crime Agency
- Local authorities
- Gangmasters and Labour Abuse Authority (GLAA)
- Salvation Army
- Migrant Help
- Medaille Trust
- Kalayaan
- Barnardo's
- Unseen
- NSPCC (CTAC)
- BAWSO
- New Pathways
- Refugee Council.

Oasis Restore will not be considered as first responder and therefore rely on Local Authorities, youth justice teams and Barnardo's to complete these referrals. Oasis Restore will be able to access support through Barnardo's Independent Child Trafficking Guardians Service. The guardians support children who have been trafficked, exploited, or used for modern slavery. 24-hour help line 0800 043 4303.

## Making a Referral to the National Referral Mechanism.

Children must be safeguarded first and then referred to the NRM. If a child is at immediate risk of harm, contact the Police and then Children's Services.

Ongoing/known risks around exploitation, risk is not immediate.

Identification of the most appropriate first responder for the child.  
First Responder can then complete the online referral for those aged under 18 years: <https://www.modernslavery.gov.uk/start>

Once submitted the NRM referral will be allocated to a The Single Competent Authority (SCA) within the Home Office or The UK Human Trafficking Centre (UKHTC) who will acknowledge receipt of the case with the first responder. This competent authority is now the first responder's first point of contact in relation to the NRM referral and should be kept abreast of any developments and supplied with any information that is of relevance to the trafficking consideration.

First Responder to share reference number for NRM with core team for the child. Reference number to be clearly recorded on child's CPOMS record.

Members of core team to ensure any updates or new information is shared with the first responder so application can be kept up to date.

The expectation is that this decision will be made within 5 working days of referral. If the single competent authority (SCA) finds there are reasonable grounds to believe someone is a potential victim of trafficking, they will be granted a minimum of 45 calendar days for recovery and reflection. The SCA then make a final conclusive grounds decision, which is either positive or negative. Once the decision has been reached, the single competent authority will notify the First Responder.

Restore Networker to update family and child of NRM process and reference details.

Restore Networker to share reference number of the NRM referral with investigating police team and defence solicitor (if child is on remand)

First responder to share outcome with child's core team. Restore Networker to update decision on CPOMS.

Restore Networker to update child and their family.

Restore Networker to share decision with investigating police team and defence solicitor (if child is on remand)

## Referrals for over 18s

Up until a child's 18 birthday a referral must be made. Once 18 there are two pathways depending on consent.

- If the adult is consenting and would like further assistance an NRM referral can be made by a First Responder at: <https://www.modernslavery.gov.uk/start>.
- If an adult does not consent to enter the NRM, a Duty to Notify should be completed - a Duty to Notify Form (MS1 Form). This can be found at the link above and select "Duty to Notify".

From 1st November 2015 specified public authorities are required to notify the Home Office about any potential victims of modern slavery they encounter in England and Wales. If you are not a First Responder, you can still report. Please go to: <https://www.modernslaveryhelpline.org/report>.

The Salvation Army provide specialist support for those adults trafficked, exploited, or used for modern slavery. Their confidential free helpline is open 24/7 0800 808 373.

## Community themes and understanding

It is essential that we maintain connected to the communities from which are children are coming from, we need to understand their worlds, community tensions and challenges, services, trend's themes and what makes their community home. By doing this we begin to understand our children, what they bring with them as well as where they may be returning too. We are committed to continuously updating our practice and models for contextual safeguarding and how these interlink with the communities our children live/d. We are also committed to sharing knowledge an insight that we gain from children whilst they are living with us as well as sharing the themes and trends within the secure estate.

To do this we aim to be connected via our trusted adults in the children's communities, the local services and statutory agencies in those areas, as well as our restore networkers directly linking with the geographical areas where our children come from, taking time to understand the community cultures, challenges, tensions, strengths and resources to support in mapping out and planning for children's transition in and out of Oasis Restore. We will have connections with the

- London and Southeast Youth Justice Heads of Service (quarterly)
- Metropolitan, Kent Police and National Police forces (National Forum quarterly)
- Community Safety Partnerships and Violent Reduction Units (London- quarterly)
- Local Childrens Safeguarding Partnerships, Serious Case Reviews and Lesson Learnt seminars.

## Mapping

Mapping can be an excellent tool in understanding networks of children, how they interconnect and relationships. As part of children's time in induction and during their stay at Restore we will work with children their family and Core Team to create peer and network maps to support in assessing and identifying risk as well as learning about and understanding children's networks how these networks can support a child but also how they may impact on transition planning and create worries or challenges.

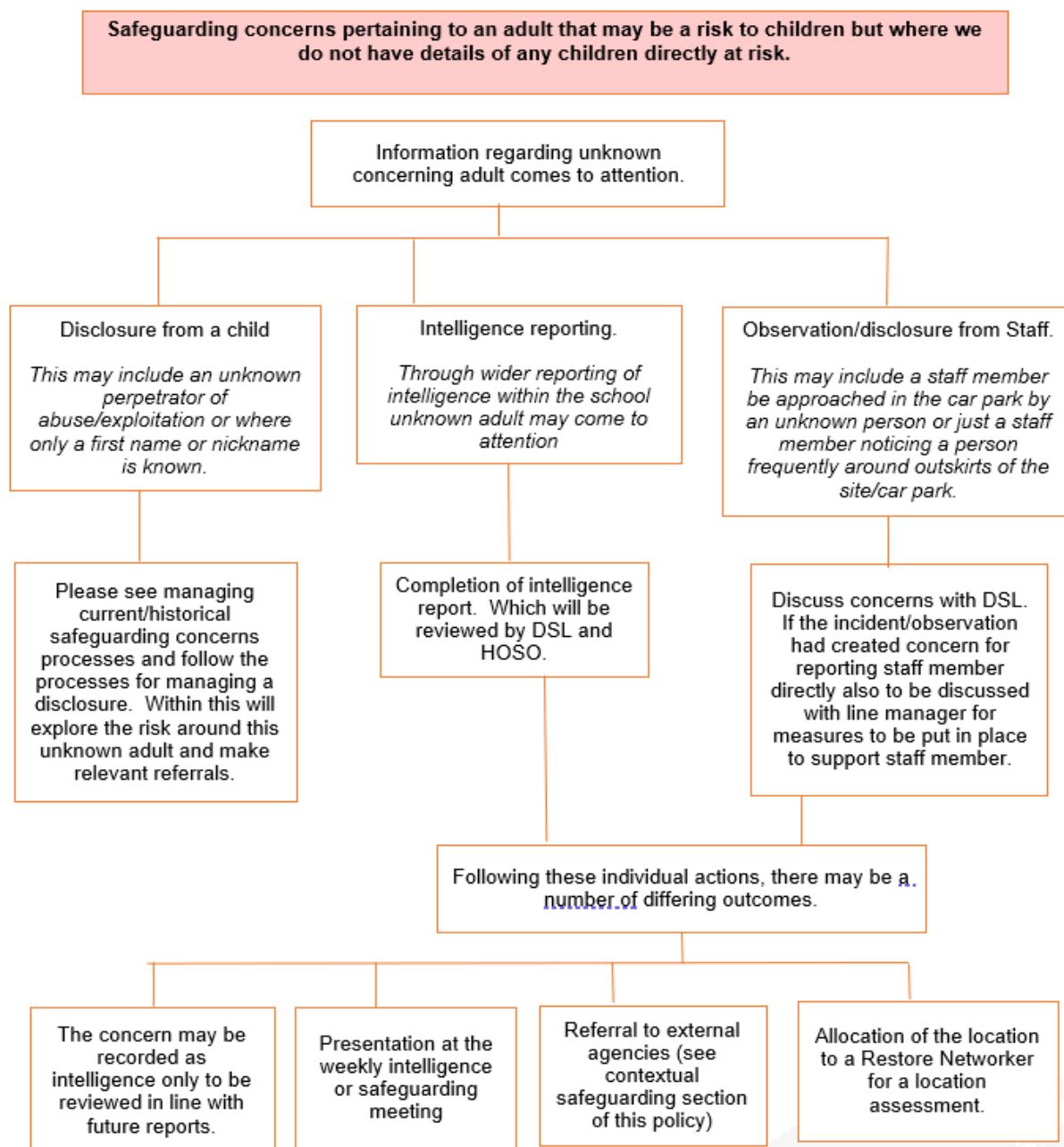
What is particularly important is that clear records of mapping are held along with how this information is known, kept up to date and contextualised, and that this is only used as a way to support with planning and safeguarding of a child.

## Managing Risk from Unknown Adults

There may be times whereby we are concerned about an adult that we cannot identify, which causes us concerns both for our child/ren or staff or contextually for other children and community. For example:

- An adult who used be in a certain park and sold drugs or offer children alcohol etc.
- A child may disclose an assault or abuse from an adult they do not know or do not feel able to tell us who this person is.
- An adult seen walking around the school grounds frequently with no clear purpose or someone taking pictures of the school.
- An adult who has approached staff/visitors or family enquiring about the school/a child or staff member at the school.

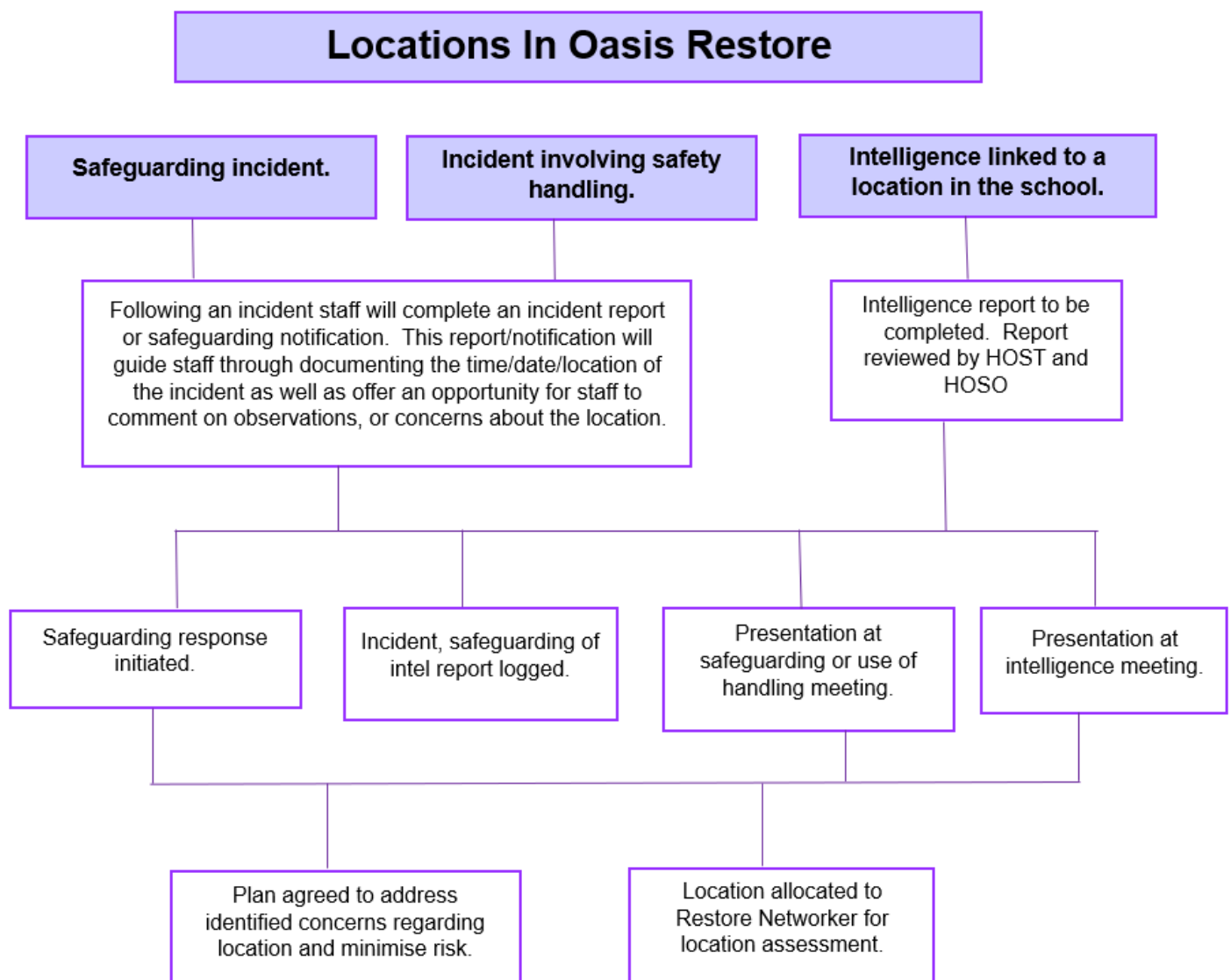
Not being able to identify the adult/s does not mean we do not take any action. These concerns must be reported in the same way as any others.



## Locations

Safeguarding children in Oasis Restore goes beyond the child/children involved. We need to consider the wider context of an incident or concern to fully understand and prevent risk. One of the most significant elements of this is the spaces and places in which an incident or risk occurs. By considering the context in which harm takes place we have a better understanding as to the cause, how to manage the current risk and provides better opportunities to disrupt future harm.

In Oasis Restore every child will have an allocated Core Team who will collectively be responsible for the care, safety and wellbeing of the child. Each Core Team will need to consider not only the child, but the context, spaces and places surround that child when assessing and considering risk. Where there are concerns about a location in the school that has come to light through incident reporting, thematic review, intel or the voice of children and staff these locations will be allocated to a Restore Networker to complete an assessment of the location developing a plan to disrupt/reduce any identified risks. Where concerns are raised about locations external to Oasis Restore the safeguarding team will refer these concerns to the relevant Local Authority and Community Safety Team for the area.



## Location Assessment

In order to create an environment where safeguarding and safety is at the centre of our care we need to look beyond just our children, their families, staff and our visitors, and beyond the incidents that take place in our school. We must also consider the wider context, spaces and places in which harm takes place, we must understand these factors and unpick what it is about them that may have contributed or prevent harm occurring. As a result we will consider the context (time, day, season, weather, child's personal context) as well as the spaces and place in which concerns arise during every incident. Where concerns arise specifically about a location in or around the school or we identify emerging patterns/trends we will complete a location assessment.

This assessment will:

- Review incidents
- Listen to children's views
- Listen to staff's views
- Consider and environmental factors
- Identify elements of commonality and difference
- Identify areas of risk and mitigation
- Take into consideration any intel that can be shared and relates to the location.

From which an analysis will be drawn, and an action plan developed. Action Plans may include things such as:

- Increased staffing or viability of staff
- Change in movement routine.
- Restorative practice between children/staff etc
- Better lighting, CCTV coverage etc.

These assessments and plans will be completed by the Restore Networkers and authorised by the Head of Safeguarding and Transitions.

These location assessments will feed into an annual contextual risk assessment completed by the Head of Safeguarding and Transitions. This will consider the context of the school and homes as a community, creating a thematic review of contextual data, reviewing the success of action planning, diversion and disruption of risk. It will importantly gain an understanding from children, staff and visitors about safety in Oasis Restore, and listen to ideas about how to continue, improve and learn. This will inform a contextual safeguarding plan for the year ahead.

## Language

Your words matter. How we talk about children with them, with each other, in conversations with professionals and in our reports, assessments and case notes impact on how children and others view our children as well as how children view themselves. This in turn can significantly impact on how children are safeguarded, the opportunities they are offered and how they are supported.

In many cases, children have been targeted, groomed, and exploited. We must be mindful that when children have been exploited, they will find it difficult to trust adults. There is likely to be a distrust of authorities and fear of reprisals. Be non-judgemental, attempt to build a rapport and gain their confidence. We must avoid blaming language such as 'putting themselves at risk' or 'lifestyle choice' or "sexually active" all contribute to victim-blaming and imply a child is responsible for abuse they have experienced. This guide allows support you to re-think your language.

- [Child Exploitation Appropriate Language Guide 2022.pdf \(childrenssociety.org.uk\)](https://www.childrenssociety.org.uk/what-we-do/our-work/child-exploitation-appropriate-language-guide-2022)



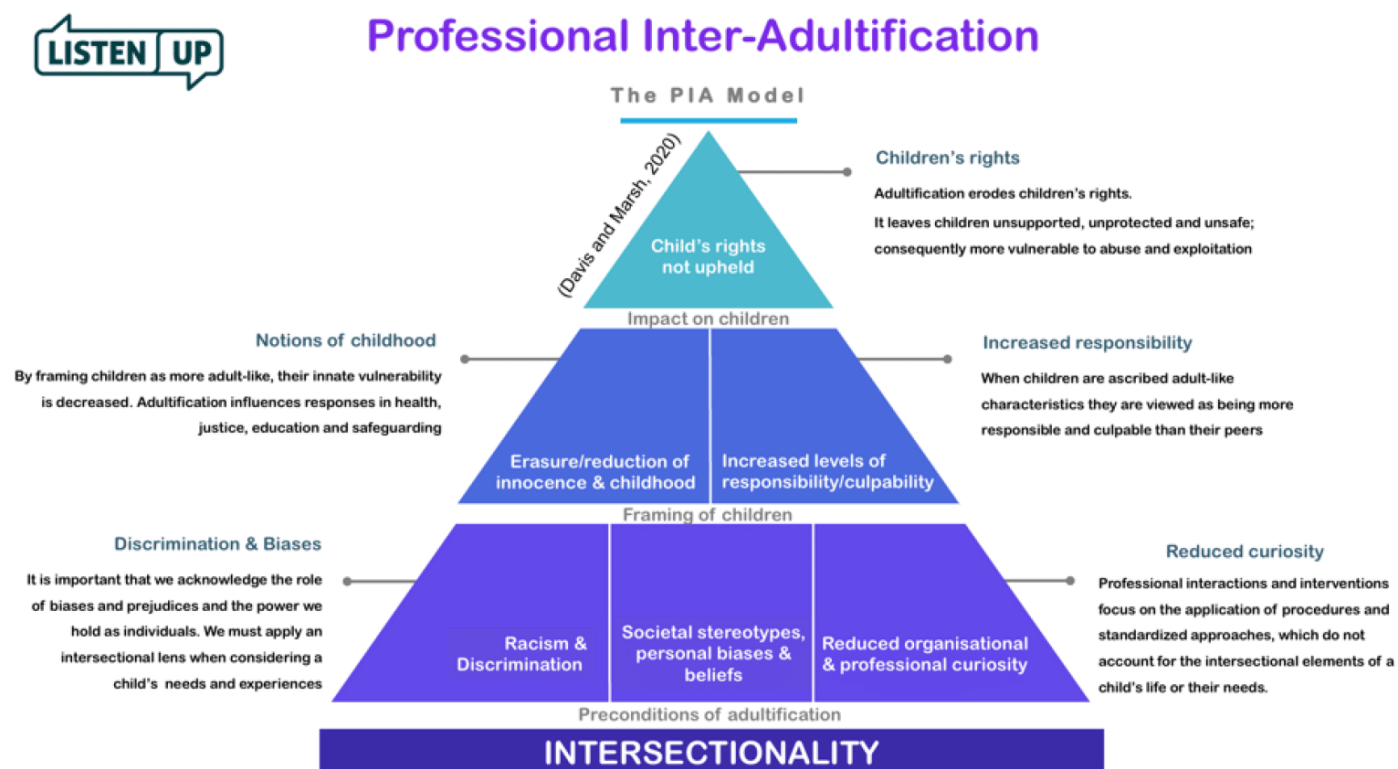
Some children may not have been exploited but have become involved in criminality due to several factors and experiences in their lives, and during their time with us they will be supported to understand their offending, impact, and consequence. It is important that through everything we do we use language with kindness and remember that every child or young adults in our care were children at the time of the offence with their own story, version of events and experiences and our language is crucial in shaping who they are in our care and who they want to be when they transition into the next step of their journey.

In Oasis Restore we are committed in all interaction with children, families, each other and professions to use language that is not blaming or hurtful. We are committed to using the child's words wherever possible and where we use language that could lead to assumptions being made, we will quantify this with evidence, examples etc. We commit to using description about behaviour instead of labelling behaviour with our interpretation for example describing a child as angry or aggressive unless the child expresses that is how they are feeling.

## Adultification

Adultification is a bias through which children are perceived as more "grown up", mature or adult like than their peers of the same age. As a result, opportunities are often missed to appropriately safeguard these children, and they are less likely to be seen or assessed as vulnerable or a victim of exploitation. This form of bias disproportionately impacts on children from Black, Asian and ethnic minority backgrounds, and exacerbates these children experience of discrimination.

Sadly, the numbers of children from these backgrounds are significantly overrepresented within the youth custody estate and we anticipate that this will be mirrored within the cohort of children at Oasis Restore. It is essential that we do not continue this discrimination in our care and approach to our children, their needs and how we talk with and about them. We will actively challenge the narrative around our children where we are concerned about any form of discrimination including adultification, directly and via escalation pathways both internally and externally.



[Adultification bias within child protection and safeguarding \(justiceinspectorates.gov.uk\)](https://justiceinspectorates.gov.uk)



## Internal Safeguarding Meetings

There will be several meetings held internally to support robust decision making and planning. These meetings will be multi-agency and act as an additional level of internal scrutiny where challenge is invited, and learning is shared.

### Safeguarding Meeting

There will be a weekly safeguarding meeting, chaired by the Head of Safeguarding and Transitions. Registered Manager to attend and in the absence of HoST to chair. This meeting will be multi-agency, inclusive staff from children's home, school, and health. This forum will be used for the following matters:

- All children presented within their induction period.
- Child's Core Team request to present a child they are worried about, or where concerns/incidents are repeated and/or ongoing.
- Review of safeguarding report/s or concern for a child/ren.
- Concerns raised about a location within the school.
- Safeguarding practice updates and learning.

### Use of Restrictive Practices Review meeting

This will be a weekly meeting. This will be chaired by the Registered Manager. The HoST will attend and chair in their absence. Relevant House Managers or Deputy House Managers may also be in attendance. Head of Inclusion/SENCO to be invited when incidents involve any child with diagnosed or suspected additional needs. This meeting is in place to review all incidents of safety handling each week through watching CCTV and body worn footage as well as the incident report and experience of child.

This meeting is aimed to identify good practice and to identify any learning or additional training needs. Learning will be shared with staff through a reflective session with a member of the panel. This meeting will also review wider themes surrounding safety handling and consider these within the learning about our operational practices and processes. Where safeguarding concerns are raised in relation to an incident of safety handling or through thematic review referrals to LADO will be made in line with the LADO referral processes.

### Managing Intelligence Meeting

This meeting will be held fortnightly and chaired by Head of Safeguarding and Transitions. The Head of Site and Operations and a Director will attend, including the Registered Manager. Whilst intelligence will be considered where deemed credible, risks will be acted on at the time of the report. This meeting is a space to analysis and map intelligence shared via intel reports helping to gather a wider contextually picture of the intelligence received. From this if there are actions required a plan will be agreed and taken forward.



Every interaction  
matters

### Contextual Safeguarding Review

This monthly meeting will be attended by the Directors, Registered Manager Head of Site and Operations, Data Analyst and Head of Safeguarding and Transitions. This will map out incidents in relation to the spaces, places and context surrounding incidents, from this we will identify any themes, trends, hotspots and create action plans to mitigate and disrupt any identified concerns. These meetings will also feed into an annual contextual risk assessment.

### Student Safeguarding Panel

The voice of children in Oasis Restore is crucial in how we operate and keep children safe. Each month we would like to bring together children as representatives from each home to share the children's sense of safety at Oasis Restore.

This is designed as a way for children to have a voice and influence within the space of safeguarding, sharing the views of other children but also holding us to account where they do not feel safe and supporting plans designed to create safety where risks are identified. This panel will be designed by children and attended by DSL, Registered Manager and Head of Site and Operations.

### Staff Safeguarding Meetings

Staff safeguarding meetings will take place in response to reports of risk to staff. This will be chaired by the Registered Manager, and include the staff member, their manager, DSL, Head of Site and Operations, and a representative from the child's Core Team to share circumstances for the child that may contextualise the risk and also to ensure that any concerns for the child are shared with the Core Team. This meeting will consider the risk to the staff member and devise a safety plan to ensure they are safeguarded which may include external referrals to police.

### Staff Safeguarding

Supporting and looking after our staff is essential to enabling them to provide high quality care to our children. We have worked to create staff environments within the school that encourage an integrated and supportive environment, with shared offices, staff room, time away from the school site for meetings and supervision. All staff support is factored into the rota for staff ensuring that their wellbeing is prioritised within their working time. In order to do this, we will have a broad range of support available to staff:

- Individual clinical supervision (fortnightly)
- Group reflective supervision (fortnightly)
- Individual line management (fortnightly)
- Team meetings
- Staff Handovers
- Debriefing following incidents
- Restorative sessions between staff and children or each other
- Employee assistance programme
- Occupational Health
- Extensive training offer for all staff.



Culture of benign enquiry

### Staff misconduct

Staff whose conduct is compromised in any way, in some settings and circumstances regarded as 'corruption', creates a significant risk to all involved: children, staff and visitors at Restore, the staff member directly involved and at times their loved ones and others connected. As a result, all concerns or reports regarding misconduct and corruption will be taken seriously, explored fully, and may lead to some form of disciplinary process, LADO process and potentially criminal charges. This is outlined within our Code of Conduct and Disciplinary policy.

Alongside the above, however, we must also assess this through a safeguarding lens, considering the risks to each party both directly and contextually. While committed to ensuring the safety of our children and the integrity of the school, we are also aware of the difficulties that arise in this work and the impact it can have on staff, and take a curious and empathic position to this as well as being clear about maintaining safe practice and boundaries. We want to ensure that we understand the source and nature of the emotional pressure the staff member has been experiencing, their decision-making processes in these positions, how they reached this point, what is the risk for them or those around them and whether that risk is now heightened as a consequence of them being caught; for

example, are they now in debt linked to a confiscation of an item meant to be conveyed. It may be that external safeguards may need to be put in place in order to manage risk to this staff member their family etc.

## Prevention

Whilst we will not be able to eliminate this risk completely, we will be aiming to prevent this as much as possible. We will be delivering safeguarding training for all staff that includes staff safeguarding. We will directly support staff with practical ways to stay safe such as.

- Managing how, what and who they share personal information.
- How to manage their social media presence and output as well as security and privacy settings.
- Clear expectations and guidelines about what staff can and cannot bring on site, consequences of corruption and support available.
- All staff will go through a security arch on arrival for each shift. Should the arch alarm staff will be offered an opportunity to check pockets etc and then asked to walk through the arch again or a wand search will be conducted, should this continue to raise a potential concern a rub down search will be completed
- Staff will have regular line management and clinical supervision, where they can have access to support and discuss any concerns they may have.
- Clear reporting and easy access to support will enable quick resolution and prevent any escalation.
- We will promote a culture of looking after and supporting each other, with clear processes to report concerns about colleagues when staff are concerned.

## Threats to Staff

There is a risk that staff could face threats to themselves or their loved ones by children or those exploiting children externally. The reasons and context around these threats may be multi-faceted for example may be said in the heat of the moment or as part of a strategy to corrupt or further exploit staff.

Any threats to staff will be taken seriously and must be reported immediately to a staff members line manager and escalated to SLT and DSL to ensure a robust safeguarding response for children and staff. All threats to staff will be taken seriously and acted on immediately via a staff safeguarding meeting. Staff safeguarding meetings will be chaired by the registered manager, and include the staff member, their manager, DSL, Head of Site and Operations, and a representative from the child's Core Team (where appropriate). This meeting will consider the risk to the staff member and devise a safety plan to ensure they are safeguarded which may include external referrals to police.

## Lived Experience

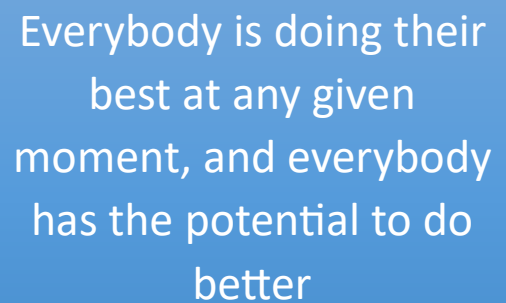
We acknowledge that all staff will come to work with us with their own life experiences which will vary greatly in nature and impact. We appreciate this may include staff who they themselves or loved ones may have been children in care or experience of the custody system but also staff who have experienced trauma and loss in their professional and personal lives. We are committed to creating an environment where staff are supported to manage the complex emotions which this work can evoke through reflective practice and supervision.

## Staff Training and Development

The ongoing development and training for our staff at Oasis Restore is critical to the care and wellbeing of our children and staff. Therefore, all staff will complete safeguarding and child protection training as part of their induction. This is inclusive of both staff and volunteers. All staff will have access to appropriate safeguarding training that is inclusive of indicators of abuse, ACSE, contextual safeguarding, exploitation and extremism, this will be bespoke to Oasis Restore and representative of our children.

All staff and volunteers will be required to attend updating safeguarding training and engage with safeguarding briefings annually. This will be organised by the Designated Safeguarding Lead. Staff will be given time to ensure that this training is undertaken. Updates throughout the year will be shared by the DSL, leadership team and safeguarding team.

The Designated Safeguarding Lead, Deputy Safeguarding Leads and Restore Networkers will be appropriately trained and be in virtual attendance at Multi-Agency Safeguarding meetings. Training will be in line with the requirements of KCSIE 2020. *The principal will attend advanced training with a designated provider identified by Oasis Community Learning.*



Everybody is doing their best at any given moment, and everybody has the potential to do better

## Quality Assurance

Oasis Restore's Quality Assurance Framework outlines the full details relating to the way in which we Quality Assure our practice across Oasis Restore.

Safeguarding will be subject to internal scrutiny, learning and review through our quality assurance and audit processes. The safeguarding meeting, children's safeguarding panel and contextual safeguarding review meetings will also act as a mechanism for internal scrutiny and challenge.

External scrutiny will come through the monthly independent visitor visits, and we are part of the Medway Safeguarding Partnership Board Secure Estate Scrutiny Panel. Oasis Restore will be inspected by Ofsted in relation to our quality of care and education, and we will be inspected by Care Quality Commission, in relation to health.

## Confidentiality and records

Oasis Restore we will take any disclosure very seriously. Staff have the professional responsibility to share relevant information about the protection of children with the DSL and Principal Director and potentially external investigating agencies.

If a child confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tell the child sensitively that they have a responsibility to refer the matter to the Designated Safeguarding Lead (DSL) to make sure they and others are safe. We will seek to reassure our children that the matter will only be disclosed to the Designated Safeguarding Lead (DSL), who will then decide on appropriate action, but also be clear about the possible next steps. Children will be included and supported through each step of the process following on from any information they share, unless to do so increases risk to themselves or another.

Accurate written notes will be kept of all incidents or Child Protection concerns relating to children. This will be held on Oasis Restore's Child Protection System's. Staff must also inform the DSL, DDSL or Principal Director.

As part of their contractual arrangements any external individual or organisation with Oasis Restore will be required to work in accordance with Oasis Restore child protection and safeguarding policy. Any external individual or organisation contracted by Oasis Restore to work with students must report any child protection incidents or disclosures from students to the Principal Director or DSL at the earliest opportunity.

Working in partnership with parents is important, Oasis Restore will endeavour to always do this. To do so safely we must also be aware of any legal order's surrounding care and family contact, who holds parental responsibility, the child's views and previous safeguarding concerns that may impact on how and when we engage and involve all or parts of a child's family. In addition, it is recognised that there are occasions when it is in the child's best interest for work to be undertaken and referrals made without the parent's initial consent to ensure the welfare and safety of our children.

In order to work with families effectively in this regard, we will:

- Aim to help parents understand Oasis Restore, our model of practice in relation to care and education for children.
- Aim to support parents to understand our safeguarding policies including our responsibility to safeguarding all children which can mean referrals to the Local Authority in the best interests of our children and others that may be impacted.
- Staff will first liaise with the DSL/DDSL before contacting families regarding a safeguarding concern.
- All our policies will be available online or on request.
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers.
- All children will be allocated a Restore Networker who will also act as a point of contact for professionals and families when they are worried about their child. They will also provide advice and signpost parents and carers to other services where they may need extra support.

Child Protection records must be kept secure and arrangements will comply with the Data Protection Policy. The DSL will ensure that all Child Protection records are kept separately from pupil records and stored securely, and access is restricted where required. Information from these files will only be shared with relevant staff when it is necessary to do so and in a manner consistent with data protection legislation.

Upon receipt of any request regarding direct access to academy documentation on a Child Protection file, the Principal and DSL will be informed, and a decision taken on the appropriate way forward in accordance with the Data Protection Policy. *See Subject Access Requests (below)*

When a child transitions from RESTORE to community and maybe back into school, child protection and safeguarding information will be shared with the relevant agencies supporting the child most likely the Local Authority, Youth Justice Team, School, and health services. This will ensure safe and consistent support for that child. This will also include transferring to the adult estate or another secure setting (YOI/ STC/ secure children's home

## **Data Protection and GDPR**

At Oasis Restore the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 will not prohibit information about children being shared with specific authorities if it is for the purposes of safeguarding children and individuals at risk. Information that could be relevant to keeping a child safe will be shared so that informed decisions can be made about a child's welfare. We recognise that we have a duty of care for our students and safeguarding is of upmost importance to us. GDPR does not 'trump' safeguarding. Processing safeguarding data is necessary for compliance with our legal obligation to which Oasis Restore is subject. Therefore, consent is not needed for the effective sharing of safeguarding information between Oasis Restore and relevant authorities.

Photographs and films represent keyways of making memories of events and Oasis Restore recognises its legal obligations to Data Protection in the processing of personal data. Oasis Restore requires that in general, for the

protection of children, where photographs of pupils are used in school publications, including the website, the pupils should not be named. Conversely, if a pupil's name appears, the pupil's image should not.

Oasis Restore will file all our reports on BROMCOM/Clearcare and our safeguarding portal CHILD PROTECTION SYSTEM. They will be set up with appropriate safeguard and arrangements to keep information safe and accessible to this that need it. The right of access, commonly referred to as subject access, gives individuals the right to obtain a copy of their personal data, as well as other supplementary information. It helps individuals to understand how and why you are using their data, and check you are doing it lawfully.

## Media Interest

Any requests for information about Oasis Restore or our children by the media should be re-directed to the national press office for Oasis. Staff should not engage in discussion with the media via phone or in person. Any contact or suspected contact from the media should be reported directly to duty SLT.

Staff should be mindful that calls from the press may come directly to the school or office phones. Staff should verify who they are talking to before giving any information over the phone. Children's family and professional networks will have passwords in place to prevent information being shared and to more easily support information sharing and verifying of information.

It is important to note that there may be times where a child's criminal court hearing may attract media attention, for example trial dates, sentencing etc. We should understand this and apply additional caution around higher risk times for each child. Where this risk is known upon arrival at Oasis Restore, we will consider this during their induction to ensure a risk management plan is in place.

## Safer Recruitment

Safe recruitment practices are an essential part of creating a safe environment for children and young people. In Oasis Restore we will ensure that staff and volunteers working with us are suitable to do so.

We will follow the specific procedures are outlined in:

- Recruitment & Selection Policy
- Recruitment Toolkit.

Keeping Children Safe in Education 2020 states that schools will be required to complete a risk assessment for each volunteer. Where the volunteer is undertaking or supporting any activity with children, an enhanced DBS and barred list check will be undertaken. 'Due Diligence' checks will be made on any speaker invited to host an assembly or speak to students during lessons and cannot be left alone at any time with children.

The Single Central Record (SCR) is an important part of Oasis Restore commitment to Safeguarding and will be maintained by a member of the office management team. It will then be audited on a regular basis. In our school the SCR will be overseen and directly managed by the principal and reviewed:

- Every half term by the Principal Director
- By the COO as part of their regular visit schedule
- By the National Safeguarding Lead as part of a systems and practice review
- Oasis Restore Board

This will allow us to sustain effective safeguarding at Oasis Restore.

## **Appendix A - Key information for Staff**

Through the Oasis' ethos, values and Restorative Framework and policies, Oasis Restore provides a platform to ensure children and young people are given the support to respect themselves and others and understand their role as a local and global citizen, being aware of the potential issues they face.

We need to be mindful that although living in Oasis Restore may therefore be protected from harm in the community or at home it is important to remember that this risk does not disappear and can increase. There may be risks in

coming to Oasis Restore and on transition as a result of the risks and tensions within the community. During our induction we will be assessing risk for each child, considering risk too them but also any risk they may pose to others.

All staff at Oasis Restore should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults or another child or children (peer on peer abuse). In a situation where abuse is alleged to have been carried out by another child/peer, the child protection procedures outlined in this policy should be adhered to for both the victim and the alleged abuser; that is, it should be considered a childcare and protection issue for both children.

All abusers must be held accountable for their behaviour and work must be done to ensure that abusers take responsibility for their behaviour and acknowledge that the behaviour is unacceptable. If there is any conflict of interest between the welfare of the alleged abuser and the victim, the victim's welfare is of paramount importance.

Abusive behaviour, which is perpetrated by peers, must be taken seriously. It is important to note that abuse or another can also be part of exploitation. Peer on peer abuse can manifest itself in many ways. This could for example include sexual assault, inappropriate sexual touch, initiation/hazing, violence, robbery, bullying, sharing/circulating indecent images or other peers. It could be through 'sexting' using online communications, text or image messaging. Please refer to the online safety policy for further information, Child Exploitation Online Protection Centre (CEOP) for further guidance on sexting at <http://www.ceop.police.uk/>

## **Risk Indicators**

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- must be regarded as indicators of the possibility of significant harm.
- justifies the need for careful assessment and discussion with designated safeguarding lead and may require consultation with and/or referral to Children's Services.

The absence of such indicators does not mean that abuse or neglect has not occurred.

## **Signs of abuse in children**

### **Neglect**

Neglect 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. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Ensure access to appropriate medical care or treatment.
- Being neglectful, or unresponsive to, a child's basic emotional needs.



The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather.
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school.
- The child is left at home alone or with inappropriate carers.

Behaviour is  
communication

### Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or a belt
- Injuries involved in domestic abuse situations where the child is a direct victim.
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks.
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred.
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted.
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers.

### Sexual Abuse

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

inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family. Recognition can be difficult unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age.
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts.
- Regressive behaviour, enuresis, soiling
- Exploited and forced into working within the sex industry both in person or via online methods, and social media.
- An anxious unwillingness to remove clothes e.g., for sports events (but this may be related to cultural norms or physical difficulties).

**Some** physical indicators associated with this form of abuse are:

- Pain or itching of genital area (anal, vaginal or penile)
- Blood on underclothes
- Pregnancy where the identity of the father is not disclosed.
- Thrush, persistent complaints of stomach disorders or pains
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia, or clothing.

### Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate, or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers, or children.

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate sexual behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed.

See link to NSPCC harmful sexual behaviour framework - [Harmful sexual behaviour framework: an evidence-informed operational framework for children and young people displaying harmful sexual behaviours \(nspcc.org.uk\)](https://www.nspcc.org.uk/what-we-do/our-frameworks/harmful-sexual-behaviour-framework/)

If an act appears to have been inappropriate, there may be a need for some form of therapeutic intervention and attention to the care and safeguarding of all those involved or affected. Abusive sexual activity including any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

To more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

**Equality** – Consider differentials of physical, cognitive, and emotional development, power, control and authority including passive and assertive tendencies.

**Consent** – agreement including all of the following:

- Understanding what is proposed; based on age, maturity, developmental level, functioning and experience.
- Knowledge of society's standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence
- A clear understanding that children under the age of 13 cannot consent to sexual activity.

**Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide and should be discussed with the DSL. It is also worth reviewing concerns against the 'Brook Traffic Light System' (Brook 2012):

<https://legacy.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool>

Sexual abuse, including suspected abuse by peers will always be investigated and will not pass it off as "banter", "just having a laugh" or "part of growing up".

## Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child/young person such as to cause severe and persistent adverse effects on the child/young person's emotional development. It may involve conveying to children/young people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child/young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child/young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child/young person participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person including domestic abuse (violence) situations where the child is witness either in person or being in the same building as the victim. It may involve serious bullying (including cyber bullying), causing children/young people frequently to feel frightened or in danger, or the exploitation or corruption of children/young people. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

### Responses from Parents/Carers

Research and experience indicate that the following responses from parents may suggest a cause for concern across all five categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home; or
- Violence between adults in the household
- Evidence of coercion and control.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

### Children with a Disability

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise on a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child.
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child's means of communication.
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting

- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

There is a concern sometimes that, for children with SEN and disabilities, their SEN or disability needs are seen first, and the potential for abuse second. If children are behaving in particular ways or they're looking distressed or their behaviour or demeanour is different from in the past, maybe staff should think about that being a sign of the potential for abuse, and not simply see it as part of their disability or their special educational needs. Children with SEND have a higher risk of being left out, of being isolated from their peers, and they are disproportionately affected by bullying.

## Homelessness

Being homeless or at risk of being homeless presents a real risk to a child's welfare. Indicators that a family is at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour. The Homelessness Reduction Act 2017 places a legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment for their needs and circumstances. Further information that summarises the new duties is available at:

- [www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets](https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets)

For children living with us in Oasis Restore risk of homelessness is a concern upon release see guidance within the transition process relating to our planning and prevention around this.

## Children and the court system

When children are required to be a witness in a criminal court, either for crimes committed against them, or for crimes that they have witnessed. Court is a time of heightened risk and vulnerability for our children for a multitude of reasons; the unknown nature of the outcomes, re-living of the trauma they have witnessed, facing and seeing the impact on the victim and/or their families, alongside risk created through media coverage.

It is important they are supported. KCSIE 2020 provides two age-appropriate support guides:

- Advice for 5-11yr olds:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/708114/yw-p-5-11-eng.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/708114/yw-p-5-11-eng.pdf)
- Advice for 12-17yr olds:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/708093/yw-p-12-17-eng.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/708093/yw-p-12-17-eng.pdf)

## Children in Care and Children Previously in Care

All staff should have awareness of issues around safeguarding looked after and previously child in care ren. Leaders should ensure that staff have the skills, knowledge and understanding necessary to keep children in care safe. A previously child in care remains vulnerable and it is important that all agencies work together to ensure that prompt action is taken on concerns to safeguard this particularly vulnerable group.

The Designated Lead for Children in Care is a staff member who promotes the care and educational achievement of children who are looked after and previously looked after. This person must have the appropriate training. The designated lead is also responsible for promoting the educational achievement of children who have left care.

Staff need to be aware of the legal status of a child in care's care arrangements. In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

### **Liaison with the virtual head**

It will be important for Designated Lead for children in care and the Director for Learning and Enrichment to have a relationship with virtual school heads from each home authority. They will receive pupil premium plus additional funding for children looked after in the authority.

The Designated Lead for children in care and children previously in care will work with the virtual school head to monitor the child's welfare and discuss how funding can be best used to support the progress of the child and meet the needs identified in the child's personal education plan.

### **Legal Status**

Legal status is also relevant to the care arrangements for our children prior to their coming to live at Oasis Restore.

- **Parental Responsibility** – Parental responsibility is defined and explained fully under [S2 Children Act 1989](#) (CA89). Parental responsibility is the legal right to make decisions in the best interests of a child.
- **Living at home** with parents or immediate family.
  - In Oasis Restore we will strongly advocate for children to remain children in care to ensure they continue to be supported during their time with us and during their transition.
- See guidance There is no legal order in place surrounding the care of the child. PR is utilised as defined in S2 CA89.
- **Children in Care -**
  - **Care Order** ([S31 CA89](#))
    - This order means that a child on the whole no longer lives with their parents or family and the named Local Authority becomes a corporate parent for a child until they are 18, sharing parental responsibility with the parent/s or carer/s.
    - Whilst parents should where safe be contacted and kept fully up to date and apart of all decision making, the Local Authority remain the main decision marker for the child.
    - Children living at Oasis Restore who are subject to a Care Order will remain children in care throughout both their remand and where relevant any sentence they receive.
  - **Interim Care Order** ([S38A CA89](#))
    - This order is very similar to the Care Order with respect to the child no longer lives with their parents or family and the named Local Authority becomes a corporate parent for a child and shares parental responsibility with the parent/s or carer/s. However, this order is only temporary (renewed 8 weekly) usually for the durations of care proceedings to determine care planning for a child.

- Whilst parents should where safe be contacted and kept fully up to date and apart of all decision making, the Local Authority remain the main decision maker for the child.
- Children living at Oasis Restore who are subject to an Interim Care Order are children in care however their status may change based on the care proceedings status. This will also create an additional instability factor for our child.
- **Accommodated by the Local Authority - [S20 \(CA89\)](#)**
  - S20 allows the Local Authority to accommodate children either with parental consent or in incidents whereby parental responsibility cannot be established (child is lost/abandoned) or no one holds parental responsibility for the child.
  - In these arrangements the Local Authority do not hold parental responsibility for the child but do have a corporate parent duty.
  - For children in the care of the Local Authority under S20 at the point of sentencing (not remand) into youth custody the Local Authority can discharge their duty as the placement decision is now managed by the courts. The practice surrounding this is changeable across differing Local Authority's, for some children may have their care status discharged. [The Children Act 1989 Guidance and Regulations \(publishing.service.gov.uk\)](#)
- **Unaccompanied Asylum-seeking children**
  - Children who are deemed as unaccompanied asylum seeking are most accommodated via S20 arrangements and therefore face the same potential challenge with respect to discharge of duty upon sentencing. Oasis Restore will strongly advocate against any decision to discharge their duty.
- **Remand**
  - Children who are remanded into custody are now children in care for the period they remain on remand. This child in care status end upon release or sentencing. Unless the child was already a child in care prior to their remand. (See above)
- **Special Guardianship Order ([S14 A-G CA89](#))**
  - This order places a child in the care of a family member or close connected person. It is often used during care proceedings as an alternative for children who cannot live with their parents. It can also be used in private family proceedings for a child to live with a family member in circumstances when PR is required by that carer, for example a parental death.
  - Special Guardian's share PR with the parents for the child, however they maintain the majority share and are the key decision makers for the child.
- **Adoption and Placement Order**
  - This order means that the adoptive parents have parental responsibility for the child. Birth parents have had all parental rights rescinded and are no longer apart of the decision making for the child.
  - Adopted child however may in some circumstance still have contact with birth parents most commonly via letterbox.
  - Adopted child are no longer considered as children in care.
- **Private Fostering ([S66/67 CA89](#))**
  - Private fostering is where a child under 16 (18 if child has a disability) is cared for by someone who is not their parent, relative or any other person who holds parental responsibility. This caring responsibility must exceed 28 days and an assessment by the Local Authority must have been completed to ensure the child is safe cared for.
  - For children who are privately fostered it is important that we establish who holds parental responsibility for the child to support with decision making.

## Leaving Care Status and Support

For children who have been in the care of the local authority at some point during their minority they may be entitled to a package of support via their leaving care service. The entitlement can be complex and at times differ

from each Local Authority. We will ensure that all children who are entitled to this support receive this and advocate for them as part of their care and transition planning in and from Oasis Restore.

If you are unsure about a child's legal status with respect to support from the leaving care, you can do this short eligibility tool. [Am I a care leaver? - Coram Voice](#)

The below table outline's levels of eligibility and support that can be offered as a result.

Categories of eligibility	What are the criteria?	What does this mean?
<b>Eligible Child</b>	<p>Child is aged 16 or 17.</p> <p>Child has been a child in care of children's services for a period of 13 weeks since the age of 14.</p> <p>And</p> <p>Child is currently a child in care.</p>	<p>Children's services to allocate a personal advisor when child reaches 17 and a half. Personal advisor is like a social worker, but they focus their work on helping young people develop their independence and readiness for transition to adulthood.</p> <p>The PA should do a need assessment and create a pathway plan based on that assessment outlining plan around transition and independence.</p> <p>In Oasis Restore where this is happening whilst children are in our care we will be a significant part of that assessment and planning and should form part of the formulation process to reduce duplication for the child and professionals.</p> <p>When the child turns 18 they will become a former relevant child and entitled to access support as outlined below.</p>
<b>Relevant Child</b>	<p>Child is aged 16 or 17.</p> <p>Child was a child in care of the children's services for a period of 13 weeks since the age of 14.</p> <p>Or</p> <p>Child was a child in care for a period of time after their 16th birthday.</p> <p>And</p> <p>Child is no longer a child in care.</p>	<p>Children's services to allocate a personal advisor when child reaches 17 and a half. Personal advisor is like a social worker, but they focus their work on helping young people develop their independence and readiness for transition to adulthood.</p> <p>If the child is no longer a child in care and does not have a SW we will need to refer into children's services to request this support. If the child leaves us before they are 17 and a half we need to ensure that the child, their parent, carer and network are aware of this support that is available to them.</p> <p>The PA should do a need assessment and create a pathway plan based on that assessment outlining plan around transition and independence.</p> <p>In Oasis Restore where this is happening whilst children are in our care we will be a significant part of that assessment and planning and should form part of the formulation</p>



		<p>process to reduce duplication for the child and professionals.</p> <p>When the child turns 18 they will become a former relevant child and entitled to access support as outlined below.</p>
<b>Former Relevant Child</b>	<p>Young person is aged between 18 and 25.</p> <p>And</p> <p>Young person was previously an eligible child and/or a relevant child</p>	<p>The law states that former relevant/eligible are entitled to the following support through Children's Service.</p> <ul style="list-style-type: none"> <li>○ Allocate a personal advisor.</li> <li>○ Support up to age 25.</li> <li>○ Help with money for your work, education, or training.</li> <li>○ Visit and stay in regular contact.</li> <li>○ Provide or pay for accommodation during college or university holidays if the child is studying away from home.</li> <li>○ Contribute towards living expenses near to the child's job, education, or training.</li> <li>○ Give the child a £2,000 grant if they are in higher education.</li> </ul> <p>Children's Services may:</p> <ul style="list-style-type: none"> <li>○ Consider contributing to post-graduate courses.</li> <li>○ Help to find financial support and resources to help to undertake post graduate study.</li> </ul>
<b>Qualifying Care Leaver</b>	<p>Child is aged between 16 and 25</p> <p>Child was a child in care by children's services on, or after, their 16th birthday and no longer looked after.</p> <p>And</p> <p>Spent less than 13 weeks in care since 14th birthday, i.e. do not fulfil criteria for eligible or relevant child</p>	<p>Children's services must:</p> <ul style="list-style-type: none"> <li>○ Give advice and support.</li> <li>○ Stay in contact.</li> <li>○ Provide or pay for accommodation during college or university holidays, if the young person is studying full-time away from home, up to age 25.</li> </ul> <p>Children's Services might also:</p> <ul style="list-style-type: none"> <li>○ Find the young person somewhere to live in exceptional circumstances.</li> <li>○ Support by buying the items they need or, in exceptional circumstances, giving financial support for your education or health.</li> <li>○ Provide a grant to pay for expenses related to education, training and work needs up to age 25.</li> <li>○ Contribute to living expenses related with education and training, up to age 25.</li> </ul>

[Services for children leaving care - childlawadvice.org.uk](http://childlawadvice.org.uk)

[My rights when I am leaving care - Coram Voice](#)

## Appendix B - The Statutory Duty

This policy sets out how Oasis Restore will meet its statutory duty under:

- Section 175 of the Education Act 2002, to safeguard and promote the welfare of our students. It has been developed in accordance with the law and guidance found at <https://www.gov.uk/> that seeks to protect children.
- Children Act 2004 Section 11 places duties on a range of organisations and individuals to make arrangements for ensuring that their functions, and any services that they contract out to others, are discharged with regard to the need to safeguard and promote the welfare of children

### Related policies

Safeguarding covers more than the contribution made to child protection in relation to individual children. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting the medical needs, providing first aid and/or intimate care, building security, drugs and substance misuse, positive behaviour management and the use of physical intervention and restraint (reasonable force).

This document must therefore be read, used and applied alongside Oasis policies.

There may be safeguarding issues that are specific to the local area or population that need to be identified in partnership with the **Local Multi-Agency Safeguarding Arrangements** and or other agencies e.g., gang membership, FGM, CSE, extremism and the safeguarding of vulnerable adults. See page 2 for our LASB contact details. **All staff** will be made aware of specific issues relating to locality that could impact the safety of children at the academy.

The Single Central Record (SCR) is an important part of the academy's commitment to Safeguarding and will be monitored locally by the Principal Director on a termly basis and by Regional Directors in their work to challenge and review the impact of leaders to sustain effective safeguarding at the academy, by MST and by the National Safeguarding Lead during a visit. The SCR will be overseen and directly managed by the Principal Director who is responsible for safeguarding in Oasis Restore, and the safeguarding leadership team

## Appendix C – Roles & responsibilities within Oasis

Safeguarding and promoting the welfare of children is **everyone's responsibility**. Everyone who comes into contact with children and their parents or carers has a role to play in safeguarding children.

Knowing what to look for is vital to the early identification of abuse and neglect and if staff are unsure, they should always speak to the designated safeguarding lead or deputy – if in exceptional circumstances, the designated safeguarding lead (or deputy lead) is not available, staff should consider speaking to a member of the ALT and/or take advice from your local Children's Social Care Team. All actions that are completed in the absence of a designated safeguarding person should be shared with them at the very earliest opportunity.

The Board of Trustees will determine and keep under review safeguarding policy and practice in Oasis Restore.

**The Chief Operations Officer**, as delegated by the Board of Trustees, is accountable for safeguarding children through Oasis Professional Governance and the Safeguarding Steering Group. The CEO reports to the Board on all Safeguarding issues.

**The Principal Director** is accountable for the effective safeguarding of children.

**The Oasis National Safeguarding Steering Group** forms a fundamental part of OCL's approach to ensuring our children have the right to protection from all types of harm and abuse and the promotion of their welfare, in line with the OCL vision. Head of Safeguarding and Transitions forms part of this group. The steering group's core purpose is to provide clear guidance so that each individual Academy can implement effective, best policy and local procedures to safeguard children. It brings together (each term):

### All staff working (including visiting staff) must:

- Observe and comply with the staff code of conduct.
- Attend all relevant training and development opportunities.
- Induction training must now include the school's behaviour policy and the school's procedures for managing children who are missing in education, as well as the staff code of conduct, and the child safeguarding and child protection policy.
- Keeping Children Safe in Education Part 1 has to be read by all members of the staff; and for everyone working directly with children, they also need to read Annex A
- Know how to deal with a disclosure; if a pupil discloses to a member of staff that they are being abused, the staff member should refer to the flowchart and follow guidance set out in this policy.
- Report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead, or in their absence, the Deputy DSL. This is in line with the Child Protection Procedures and legal duty for reporting FGM.
- Be alert to the signs of harm and abuse, including issues that can manifest themselves due to peer-on-peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. Further information can be found in APPENDIX A.
- Know the Designated and Deputy Safeguarding Lead's name and contact details including telephone numbers and email.
- All staff must be aware of the early help process; this includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. All early help cases should be reviewed regularly and if the situation is not improving then consideration should



It takes a village

be given to a referral to children's social care.

#### **The Principal Director (and Responsible Individual) will:**

- Be responsible for the effective safeguarding of children at Oasis Restore and for developing a culture of safeguarding in all aspects of the school, home, health and central services.
- Be responsible for the implementation of this and all related policies and procedures, ensuring that the outcomes are monitored.
- Undertake the OCL annual safeguarding audit, and report outcomes to their RD through the academy action plan for safeguarding.
- Ensure that whilst the activities of the designated safeguarding lead (DSL) can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out below, remains with the designated safeguarding lead.
- Meet each week with the DSL and regularly with the safeguarding team.
- Attend advanced training with an accredited provider identified in liaison with their RD.
- Through the DSL team ensure that:
  - All staff are vigilant to harm and abuse, are able to identify those students for whom there are child protection concerns and can make appropriate referrals, including to early help services.
  - Promote the educational outcomes and track the progress and attainment of all the vulnerable children, but specifically 'those in need of a social worker'.
  - All staff and volunteers are trained sufficiently so they have the skills, knowledge and understanding necessary to always keep children safe, including on site, when attending alternative provision, educational visits off site or work-related learning
- Ensure that the KCSiE guidelines for effectively managing SEND and safeguarding are in place including the 2020 updates to this area.
- Appoint a designated teacher to promote the educational achievement and welfare of children in care or were previously children in care and to ensure that this person has appropriate training.
- Communicate clearly to visitors, parents and students so everyone understands Oasis Restore safeguarding policy and procedures.
- Ensure that there is a deputy DSL in place to add capacity and ensure sustainable provision.
- Ensure consideration to the range of responsibilities the DSL undertakes e.g., the DSL needs to have the flexibility to act immediately on a referral that requires an urgent response and time to attend lengthy meetings or case conferences.
- Ensure that contact and role details of the DSL and Deputy DSL are clearly displayed in staff areas, the staff handbook and website (along with this policy).
- Bring to the attention the Regional Director safeguarding matters and report on a termly basis at the specific safeguarding governance meetings (see national calendar) and through regular C+R meetings. Any specific incidents must be reported directly to the RD as they occur.
- Ensure safe recruitment practice is followed when recruiting to posts, and ensure appropriate action is taken when an allegation is made against a member of staff.
- Ensure the academy offers a safe environment through effective implementation of the Oasis health and safety policy to meet the statutory responsibilities for the safety of students and staff.

#### **The Designated Safeguarding Lead is responsible for:**

- Being available (or the deputy DSL in their absence) for staff or volunteers to discuss any safeguarding concerns.
- Ensuring that all cases of suspected or actual problems associated with child protection are referred to the appropriate agencies in line with procedures set out in this policy, keeping the Principal Director apprised.
- Ensuring the academy's safeguarding policy and practice is relevant and consistent with the most recent statutory guidance.
- Being aware of the latest national and local guidance and requirements and keeping the Principal Director and staff informed as appropriate.

- Attend accredited, enhanced training as defined by the local Multi-Agency Safeguarding Arrangements to fulfil the role.
- Ensuring that appropriate training for staff is organised according to the agreed programme with the Principal Director and renewed through ongoing professional development.
- Ensuring families are fully aware of the academy safeguarding policies and procedures and are kept informed and involved.
- Keeping Children Safe in Education 2020 says that schools should have at least two emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at home. The DSL is responsible for ensuring this is in place.
- Ensuring that effective communication and liaison takes place between the Academy and the Local Authority, and any other relevant agencies, where there is a Safeguarding concern in relation to an academy student.
- Ensuring that all staff have an understanding of child abuse, neglect and exploitation and their main indicators, including for children in care and additional vulnerabilities of children with special educational needs (SEN) and disabilities.
- Maintaining details of any child in care's social worker and the name of the virtual school head (in the authority that looks after the child)
- Working with the relevant Virtual School Head to discuss how funding can be best used to support the progress of children in care at the academy and meet the needs identified in the child's personal education plan.
- Dealing with allegations of abuse in accordance with local and statutory procedures.
- supporting the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate if early help is appropriate.
- Ensuring that adequate reporting and recording systems are in place.
- Ensuring relevant records are passed on appropriately when students transfer to other schools or are being educated at alternative provision or off-site education.
- Being aware of children who are or who may be living in a private fostering arrangement. The Local Authority Private Fostering Officer is known to the Academy and ensures liaison to support the welfare and safety of the child.
- Undertaking the OCL annual safeguarding audit with the Principal and Deputy DSL.

The Designated and Deputy Safeguarding Lead will meet regularly with the Principal Director and safeguarding leadership team to discuss safeguarding issues including outcomes and implementation of actions relating to case conferences and core groups and all current case work. These meetings must be evidenced by minutes and/or on CHILD PROTECTION SYSTEM. Other key staff will be invited as appropriate.

Safeguarding matters arising will be discussed routinely at each staff meeting and each RD visit (all safeguarding issues will be flagged immediately to the RD by the Principal Director).

### Independent Visitor

Independent person (visits and reports):

- We are waiting to appoint our IV.

### Regulation 44

The registered person must ensure that an independent person visits the children's home at least once each month. When the independent person is carrying out a visit, the registered person must help the independent person:

- a) If they consent, to interview in private such of the children, their parents, relatives and persons working at the home as the independent person requires; and

b) To inspect the premises of the home and such of the home's records (except for a child's case records, unless the child and the child's placing authority consent) as the independent person requires.

A visit by the independent person to the home may be unannounced.

The independent person must produce a report about a visit ("the independent person's report") which sets out, in particular, the independent person's opinion as to whether.

a) children are effectively safeguarded; and

b) the conduct of the home promotes children's well-being.

The independent person's report may recommend actions that the registered person may take in relation to the home and timescales within which the registered person must consider whether or not to take those actions.

If the independent person becomes aware of a potential conflict of interest (whether under regulation 43 or otherwise) after a visit to the home, the independent person must include in the independent person's report:

a) details of the conflict of interest; and

b) the reasons why the independent person did not notify the registered provider of the conflict of interest before the visit.

The independent person must provide a copy of the independent person's report to:

a) OFSTED

b) upon request, the local authority for the area in which the home is located

c) the placing authorities of children

d) the registered provider and, if applicable- the registered manager

e) the responsible individual (if one is nominated) - Principal Director

### **Regulation 45 - Review of quality of care**

The registered person must complete a review of the quality of care provided for children ("a quality of care review") at least once every 6 months. In order to complete a quality of care review the registered person must establish and maintain a system for monitoring, reviewing and evaluating:

a) the quality of care provided for children

b) the feedback and opinions of children about the children's home, its facilities and the quality of care they receive in it

c) any actions that the registered person considers necessary in order to improve or maintain the quality of care provided for children.

After completing a quality of care review, the registered person must produce a written report about the quality of care review and the actions which the registered person intends to take as a result of the quality of care review ("the quality of care review report").

The registered person must:

a) supply to Ofsted a copy of the quality of care review report within 28 days of the date on which the quality of care review is completed

b) make a copy of the quality of care review report available on request to a placing authority, if the placing authority is not the parent of a child accommodated in the home.

The system referred to must provide for ascertaining and considering the opinions of children, their parents, placing authorities and staff



## Document Control

### Policy Tier

☒ Tier 1

☐ Tier 2

☐ Tier 3

☐ Tier 4

### Owner

[Sara.corlett@oasisrestore.org](mailto:Sara.corlett@oasisrestore.org)

### Contact in case of query

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### Approvals

This document requires the following approvals.

Organisation	Date Approved
Oasis Restore Board	January 2024
Executive – COO, CPO, CFO	February 2024
Oasis Director for Safeguarding	October 2023
Ministry of Justice/ Youth Custody Service (safeguarding leads)	December 2023
NHS (safeguarding leads)	September 2023
Safeguarding Childrens Partnership	October 2023

### Position with the Unions

Does the policy or changes to the policy require consultation with the National Unions under our recognition agreement?

☐ Yes

☒ No

If yes, the policy status is:

- ☐ Consulted with Unions and Approved
- ☐ Fully consulted (completed) but not agreed with Unions but Approved by OCL
- ☐ Currently under Consultation with Unions
- ☐ Awaiting Consultation with Unions

Date & Record of Next Union Review

### Location

Tick all that apply:

- ☒ Oasis Restore website
- ☒ Policy portal
- ☐ Other: state

### Customisation

- ☐ Oasis Restore policy
  - ☐ Policy is included in Principals' annual compliance declaration
- Completed in line with the local authority Section 11 audit.

### Distribution

This document has been distributed to:

Name	Position	Date	Version

# How to guide

## Effectively manage a child missing from education

### Overview

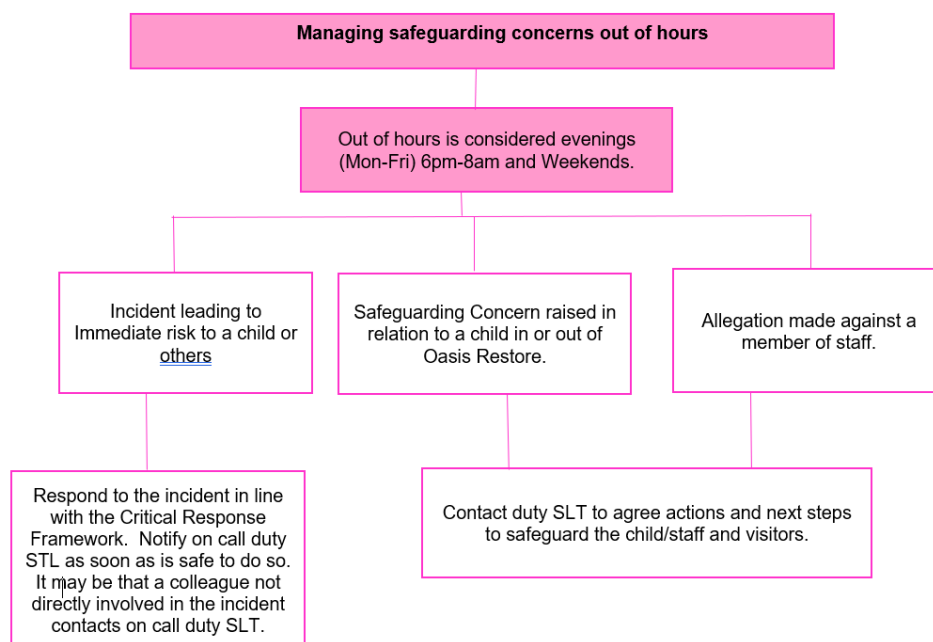
When children start their journey at Oasis Restore, they will all have had a range of educational experience some positive and some negative and some children may have been out of education for a number of years/months.

In Oasis Restore we have high aspirations for our children to thrive in every aspect of their lives, our education offer is key to achieving this, and their attendance and engagement in education is vital. We understand that there will of course be times where children cannot engage due to attendance at court or sickness which will be managed and supported by the formulation plans and health care team.

There will also be times where due to a behavioural incident in school a child may not be able to participate in a class until a participation review has taken place to ensure a child and others safety in a classroom.

**Should this exceed 3 school days** a separation review should take place as outlined in the separation section of this policy. Where children are missing from education, and this is not due to court or sickness we firstly need to try to understand why the child does not wish to be in education. Refusal to attend school will trigger the missing from education process.

### Step by Step guidance.



# How to guide

## Effectively manage a safeguarding disclosure for a resident child at Oasis Restore who is 18+

### Overview

Whilst we recognise the external safeguarding systems and legislation are different for adults, we are aware that the safeguarding risks and concerns for children 18 and over are no different to those of younger students. We are committed to ensuring we respond in the same way.

The below outlines guidance and system-based advice on how we should manage safeguarding concerns regarding **resident** children at Oasis Restore who are **18+**

### Non-direct disclosure: Have you witnessed or overheard something that has worried you about a child within Oasis Restore who is 18+?

- Don't Ignore it – safeguarding is like a puzzle; one small piece of information could be the missing part of a bigger picture.
- If you see something that you feel places a child or others at immediate risk alert DSL/DDSL straight away and make sure the child, is supervised and safe. They may need to refer to the critical incident framework if they agree there is immediate risk.
- Once the above steps have been taken. If the concern was urgent, upload all information to the Child Protection System within 1 hour.
- If it is something related to safeguarding, but not a child whose safety is immediately at risk, inform your line manager/DSL/DDSL and complete a report on the Child Protection System within 6 hours.

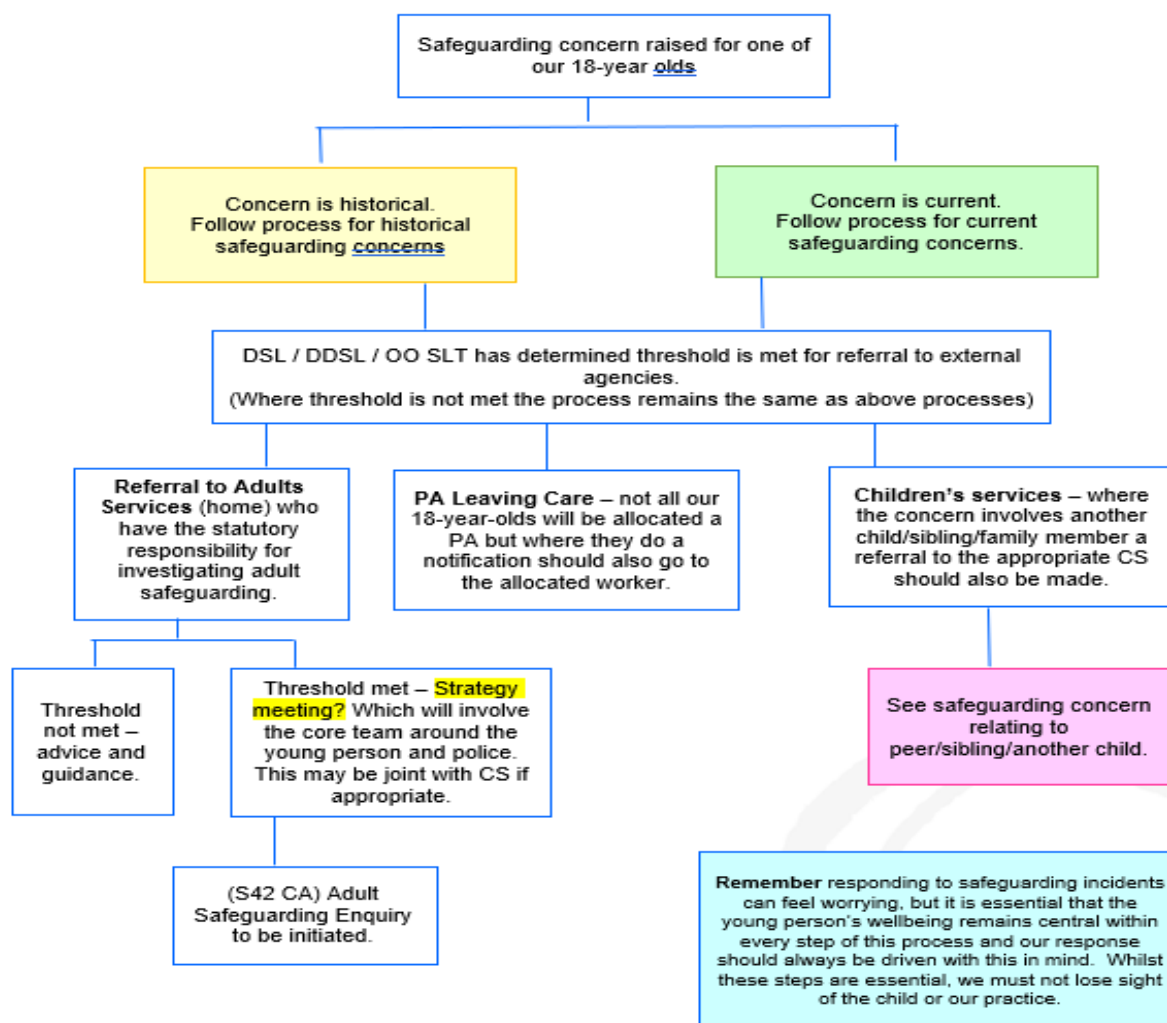
### Direct disclosure: Is someone disclosing something directly to you about an 18+ child?

- Always listen carefully and quietly – do not press for information, let the child give their account without asking leading questions.
- Remain calm and reassuring – do not dismiss the disclosure – do not show emotional distress or concern but also remain human in this interaction.
- Show that you care through open and reassuring facial and body language/do not interrogate or ask leading questions. Use gentle questions such as “how did you feel/who was there/can you show me where/facial expressions).
- Take a detailed written account (verbatim) of what the child has said, make this as comprehensive as possible – what tense was used? What specific words did the child use? Where did the disclosure happen and when? What questions did you ask?
- Explain that you **must** report what they have told you to ensure that they and others are kept safe – use the reporting time frames above.
- Ensure the child is in a place they feel safe and with staff they feel safe with before leaving the child.

## Step by Step guidance.

### Managing a Safeguarding concern for a young person (18+) who is resident at Oasis Restore.

Whilst the external process for safeguarding adults externally is somewhat different due to the legislation in place for safeguarding children and adults. In Oasis Restore we recognise that the risk for our 18-year-olds is no significant that for our 12–17-year-olds. Therefore, our response to managing safeguarding concerns will mirror the processes and timescales set out above for children.



### What is next?

- Ensure that if you feel a child is in immediate danger you have followed the above advice and have not left the child alone before doing so.
- Ensure you have recorded the event in as much detail as possible and in a timely manner on the child protection system.
- Ensure that you keep the disclosure confidential until you have discussed with

### Key Reminders

- DSL/SLT and a plan has been agreed.
- If you need more support refer to the safeguarding policy or DSL/DDSL.
- Never promise a child confidentiality.
- Do not place blame on the child and reassure them they have done the right thing by telling you.
- If you feel you need support for your wellbeing after a disclosure please speak to

the DSL/DDSL - all staff will also be able to discuss disclosures in debriefs, through

supervision

# How to guide

## Effectively manage a current safeguarding disclosure for a resident child at Oasis Restore

### Overview

All staff and volunteers at Oasis Restore should be able to confidently manage a safeguarding disclosure. The guidance and systems ensure that we manage disclosures thoroughly but using a trauma informed approach.

The below outlines guidance and system-based advice on how we should manage **current** safeguarding concerns regarding **resident** children at Oasis Restore.

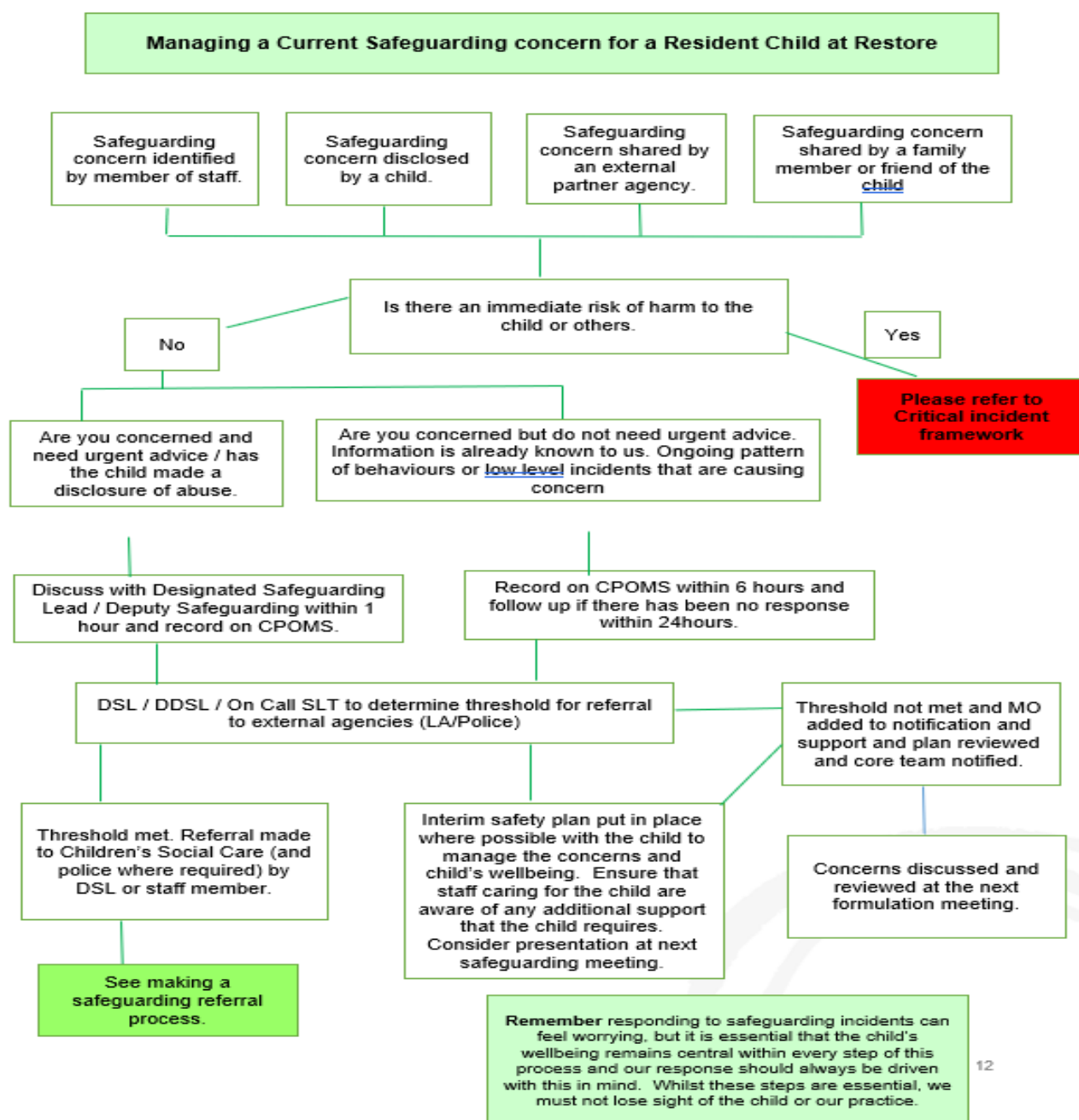
### Non-direct disclosure: Have you witnessed or overheard something that has worried you about a child within Oasis Restore?

- Don't Ignore it – safeguarding is like a puzzle; one small piece of information could be the missing part of a bigger picture.
- If you see something that you feel places a child or others at immediate risk alert DSL/DDSL straight away and make sure the child, is supervised and safe. They may need to refer to the critical incident framework if they agree there is immediate risk.
- Once the above steps have been taken. If the concern was urgent, upload all information to the Child Protection System within 1 hour.
- If it is something related to safeguarding, but not a child whose safety is immediately at risk, inform your line manager/DSL/DDSL and complete a report on the Child Protection System within 6 hours.

### Direct disclosure: Is someone disclosing something directly to you?

- Always listen carefully and quietly – do not press for information, let the child give their account without asking leading questions.
- Remain calm and reassuring – do not dismiss the disclosure – do not show emotional distress or concern but also remain human in this interaction.
- Show that you care through open and reassuring facial and body language/do not interrogate or ask leading questions. Use gentle questions such as “how did you feel/who was there/can you show me where/facial expressions).
- Take a detailed written account (verbatim) of what the child has said, make this as comprehensive as possible – what tense was used? What specific words did the child use? Where did the disclosure happen and when? What questions did you ask?
- Explain that you **must** report what they have told you to ensure that they and others are kept safe – use the reporting time frames above.
- Ensure the child is in a place they feel safe and with staff they feel safe with before leaving the child.

## Step by Step guidance.



### What is next?

### Key Reminders

- Ensure that if you feel a child is in immediate danger you have followed the above advice and have not left the child alone before doing so.
- Ensure you have recorded the event in as much detail as possible and in a timely manner on the child protection system.
- Ensure that you keep the disclosure confidential until you have discussed with

DSL/SLT and a plan has been agreed.

- If you need more support refer to the safeguarding policy or DSL/DDSL.
- Never promise a child confidentiality.
- Do not place blame on the child and reassure them they have done the right thing by telling you.
- If you feel you need support for your



wellbeing after a disclosure please speak to the DSL/DDSL - all staff will also be able to discuss disclosures in debriefs, through supervision

# How to guide

## Effectively manage a historical safeguarding disclosure for a resident child at Oasis Restore

### Overview

All staff and volunteers at Oasis Restore should be able to confidently manage a safeguarding disclosure. The guidance and systems ensure that we manage disclosures thoroughly but using a trauma informed approach.

The below outlines guidance and system-based advice on how we should manage **historical** safeguarding concerns regarding **resident** children at Oasis Restore.

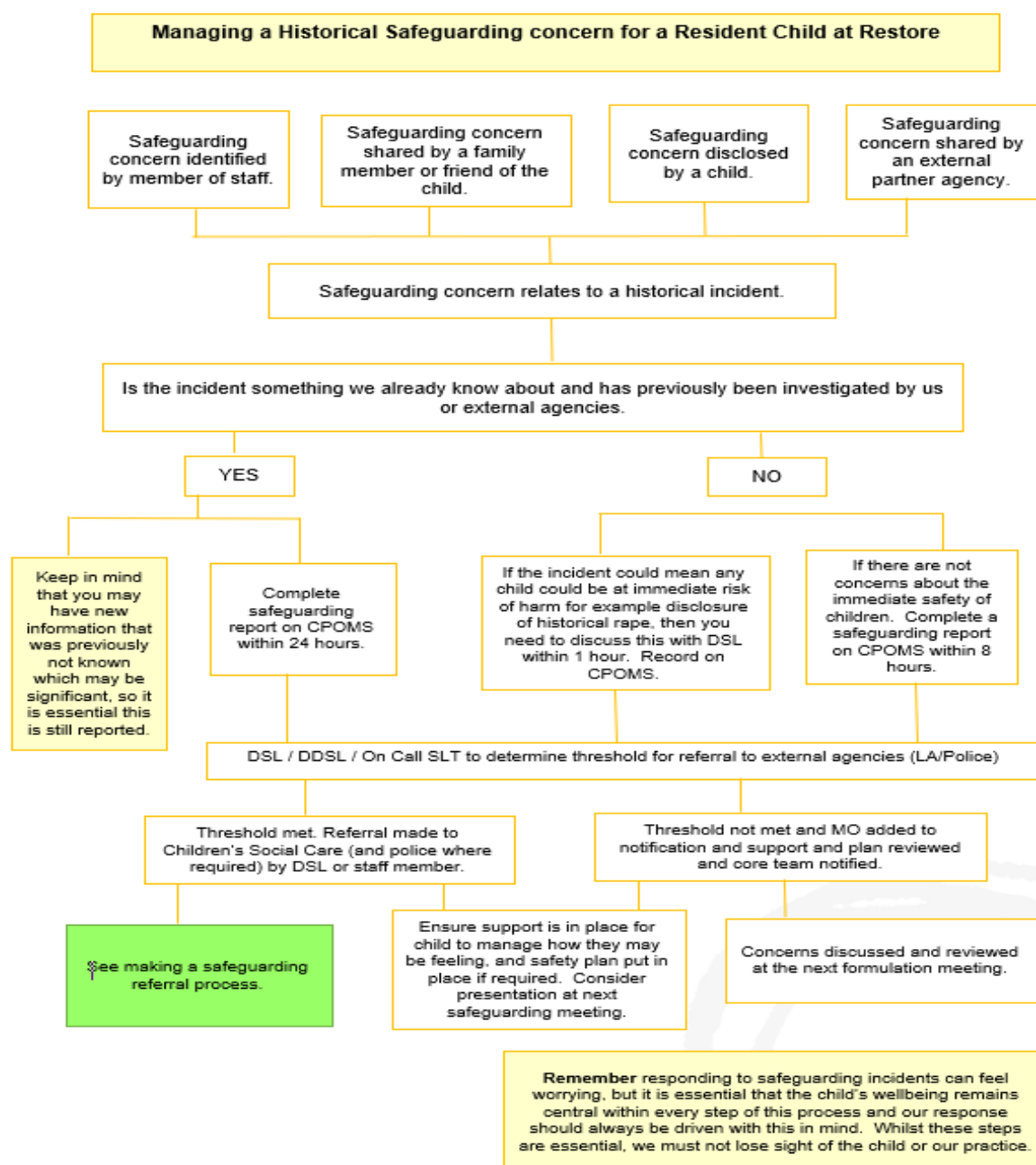
### Non-direct disclosure: Have you witnessed or overheard something that has alerted you to a historical safeguarding concern?

- |  |   |
|--|---|
| <ul style="list-style-type: none"><li>• Don't Ignore it – safeguarding is like a puzzle; one small piece of information could be the missing part of a bigger picture.</li></ul>   | child was at or is at immediate risk – discuss with DSL and log on safeguarding system within 1 hour.   |
| <ul style="list-style-type: none"><li>• If you feel sure the information is regarding something we are already aware of log this on the safeguarding system within 24 hours.</li><li>• If you feel this is new information means the</li></ul> | <ul style="list-style-type: none"><li>• If it is new information but there is no immediate risk log this on the safeguarding system within 8 hours.</li></ul> |

### Direct disclosure: Is someone disclosing something directly to you?

- |   |  |
|---|--|
| <ul style="list-style-type: none"><li>• Always listen carefully and quietly – do not press for information, let the child give their account without asking leading questions.</li><li>• Remain calm and reassuring – do not dismiss the disclosure – do not show emotional distress or concern but also remain human in this interaction.</li><li>• Show that you care through open and reassuring facial and body language/do not interrogate or ask leading questions. Use gentle questions such as “how did you feel/who was there/can you show me where/facial expressions).</li></ul> | <ul style="list-style-type: none"><li>• Take a detailed written account (verbatim) of what the child has said, make this as comprehensive as possible – what tense was used? What specific words did the child use? Where did the disclosure happen and when? What questions did you ask?</li><li>• Explain that you <b>must</b> report what they have told you to ensure that they and others are kept safe – use the reporting time frames above.</li><li>• Ensure the child is in a place they feel safe and with staff they feel safe with before leaving the child.</li></ul> |
|---|--|

## Step by Step guidance.



### What is next?

### Key Reminders

- Ensure that if you feel a child is in immediate danger you have followed the above advice and have not left the child alone before doing so.
- Ensure you have recorded the event in as much detail as possible and in a timely manner on the child protection system.
- Ensure that you keep the disclosure confidential until you have discussed with DSL/SLT and a plan has been agreed.
- If you need more support refer to the safeguarding policy or DSL/DDSL.
- Never promise a child confidentiality.
- Do not place blame on the child and reassure them they have done the right thing by telling you.
- If you feel you need support for your wellbeing after a disclosure please speak to the DSL/DDSL - all staff will also be able to discuss disclosures in debriefs, through supervision

# How to guide

## Effectively manage a safeguarding concern for a child outside of Oasis Restore

### Overview

When working with children in Oasis Restore it is vital, we consider whether any children outside of Oasis Restore could be at risk. This could be siblings, children, cousins, or any other young person outside of the Oasis Restore community.

The below outlines guidance and system-based advice on how we should manage safeguarding concerns regarding **children outside of Oasis Restore**.

#### **Non-direct disclosure: Have you witnessed or overheard something that has worried you about a child outside of Oasis Restore.**

- Don't Ignore it – safeguarding is like a puzzle; one small piece of information could be the missing part of a bigger picture.
- If you see something that you feel places a child at immediate risk alert DSL/DDSL straight away and make sure the child, is supervised and safe.
- Consider the wider risk to the child, what do we need to consider to keep them safe?
- Intervene to protect the child if the risk is immediate and severe.

#### **Direct disclosure: Is someone disclosing something directly to you?**

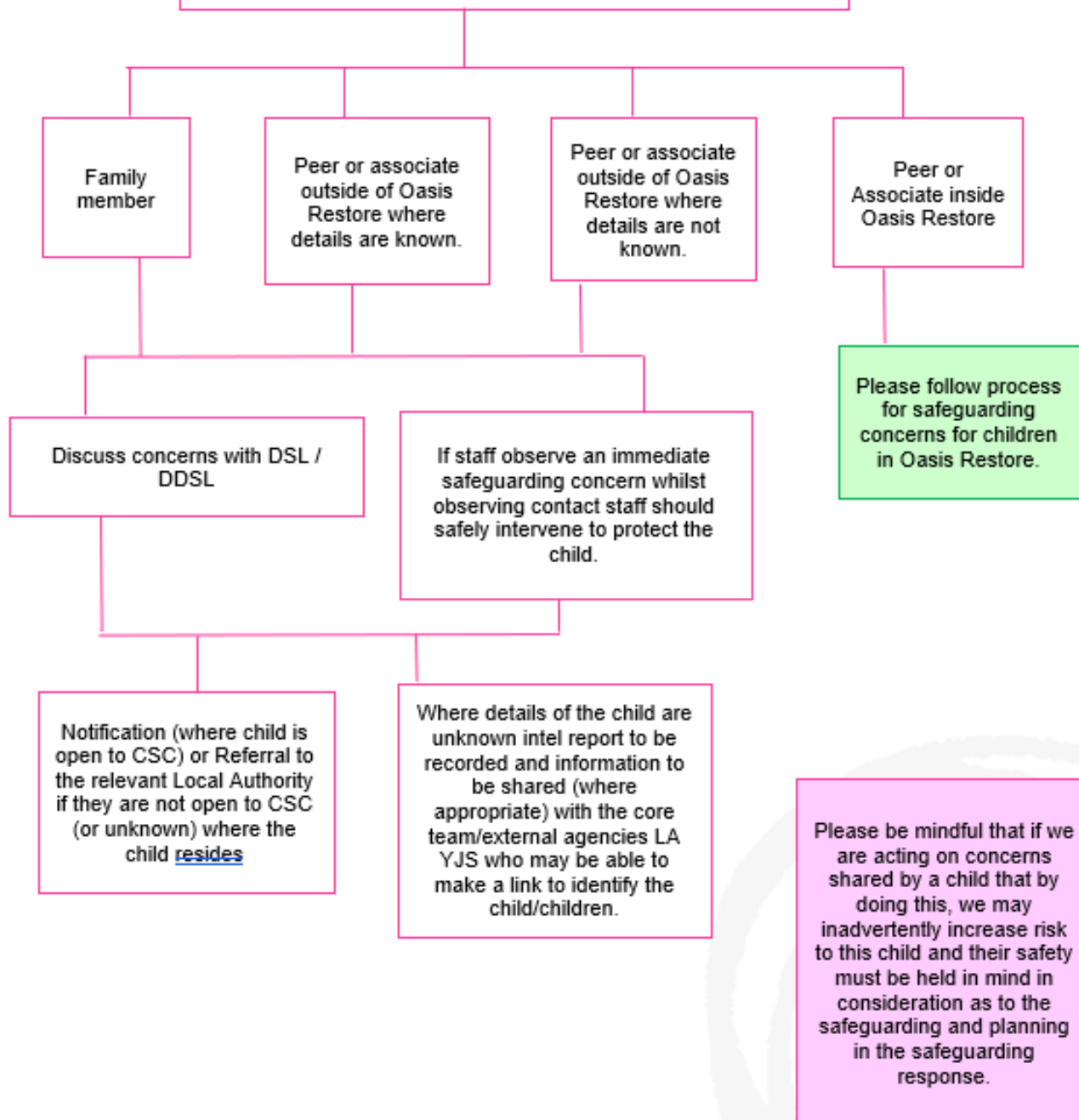
- Always listen carefully and quietly – do not press for information, let the child give their account without asking leading questions.
- Remain calm and reassuring – do not dismiss the disclosure – do not show emotional distress or concern but also remain human in this interaction.
- Show that you care through open and reassuring facial and body language/do not interrogate or ask leading questions. Use gentle questions such as “how did you feel/who was there/can you show me where/facial expressions).
- Take a detailed written account (verbatim) of what the child has said, make this as comprehensive as possible – what tense was used? What specific words did the child use? Where did the disclosure happen and when? What questions did you ask?
- Explain that you **must** report what they have told you to ensure that they and others are kept safe – use the reporting time frames above.
- Ensure the child is in a place they feel safe and with staff they feel safe with before leaving the child.

## Step by step guidance

### Safeguarding concern relating to a peer or sibling or any other child outside of Oasis Restore

When we are dealing with safeguarding concerns for our children in Oasis Restore it is important that we consider wider risk to siblings/family, friends and associates, and act on this.

Concerns raised by child directly/indirectly in relation to another child. OR concerns identified during contact between child and family/friends.



# How to guide

## Effectively manage a safeguarding concern for a child who has left Oasis Restore

### Overview

It is our vision that we will maintain contact with children as they transition on to the next stages of their lives. It is our hope that we will continue to nurture positive relationships and see them in the community. As such it is possible that a disclosure may be made or something may be witnessed by staff once a child has left Oasis Restore.

The below outlines guidance and system-based advice on how we should manage safeguarding concerns regarding **nonresident** children at Oasis Restore.

### Non-direct disclosure: Have you witnessed or overheard something that has worried you about within Oasis Restore.

- Don't Ignore it – safeguarding is like a puzzle; one small piece of information could be the missing part of a bigger picture.
- If you see something that you feel places a child at immediate risk alert DSL/DDSL straight away and make sure the child, is supervised and safe.
- If advised to leave the child or you do not deem an immediate risk ensure they know who to contact in an emergency or if they are worried. Then alert the DSL.
- Where possible ensure you complete your visit as normal.

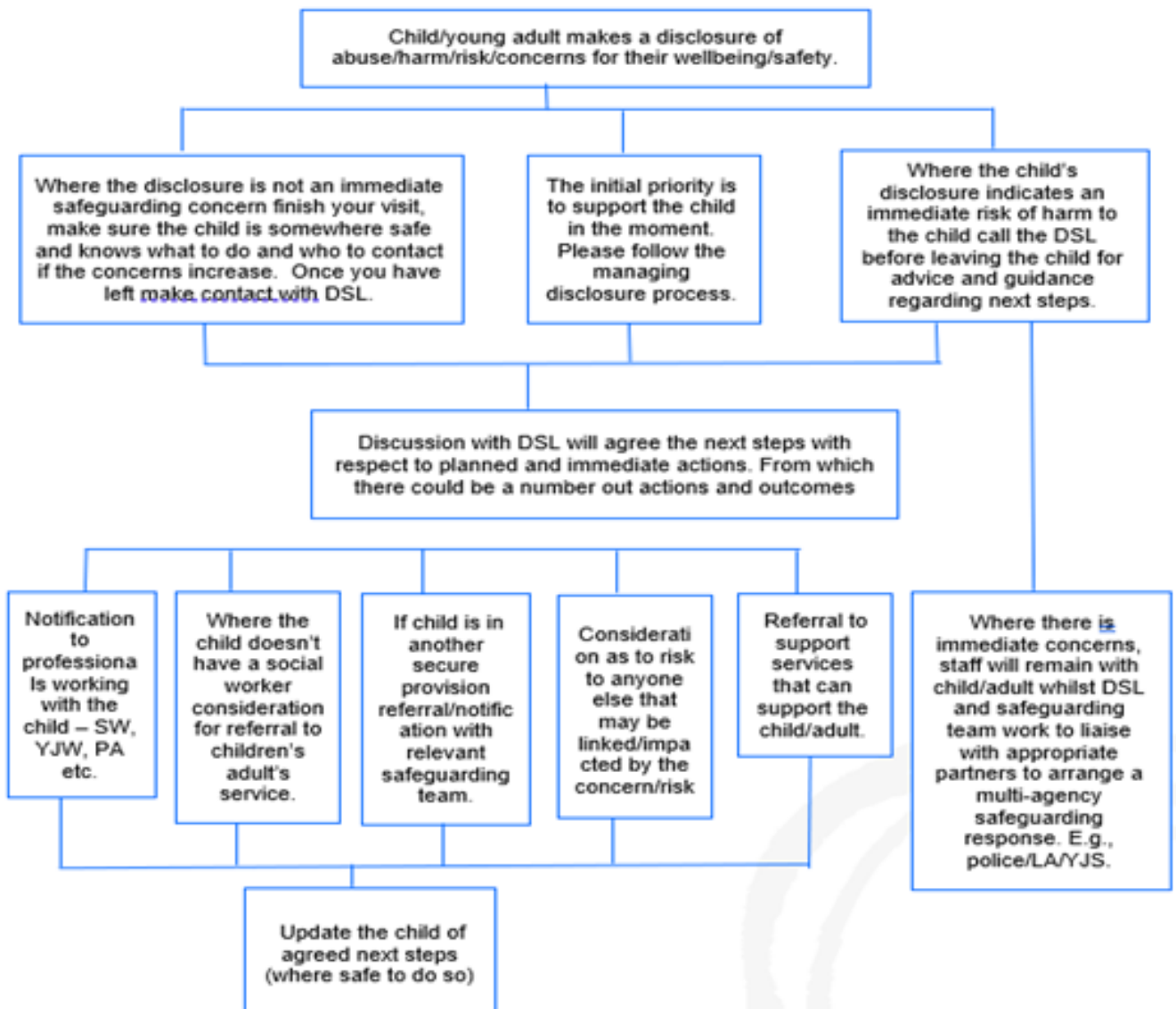
### Direct disclosure: Is someone disclosing something directly to you?

- Always listen carefully and quietly – do not press for information, let the child give their account without asking leading questions.
- Remain calm and reassuring – do not dismiss the disclosure – do not show emotional distress or concern but also remain human in this interaction.
- Show that you care through open and reassuring facial and body language/do not interrogate or ask leading questions. Use gentle questions such as “how did you feel/who was there/can you show me where/facial expressions).
- Take a detailed written account (verbatim) of what the child has said, make this as comprehensive as possible – what tense was used? What specific words did the child use? Where did the disclosure happen and when? What questions did you ask?
- Explain that you **must** report what they have told you to ensure that they and others are kept safe – use the reporting time frames above.
- Ensure the child is in a place they feel safe and with staff they feel safe with before leaving the child.

## Step by step guidance

### Safeguarding concern for a child who has left Oasis Restore.

It is our vision that we will maintain contact with our children as they transition onto the next steps of their lives. It is hoped that all children and young people will have built relationships with staff that may be maintained as part of their transition and after care support. As a result of this it is possible that child may choose our staff to disclose to when they are no longer in our care. This response is to support staff in these circumstances.



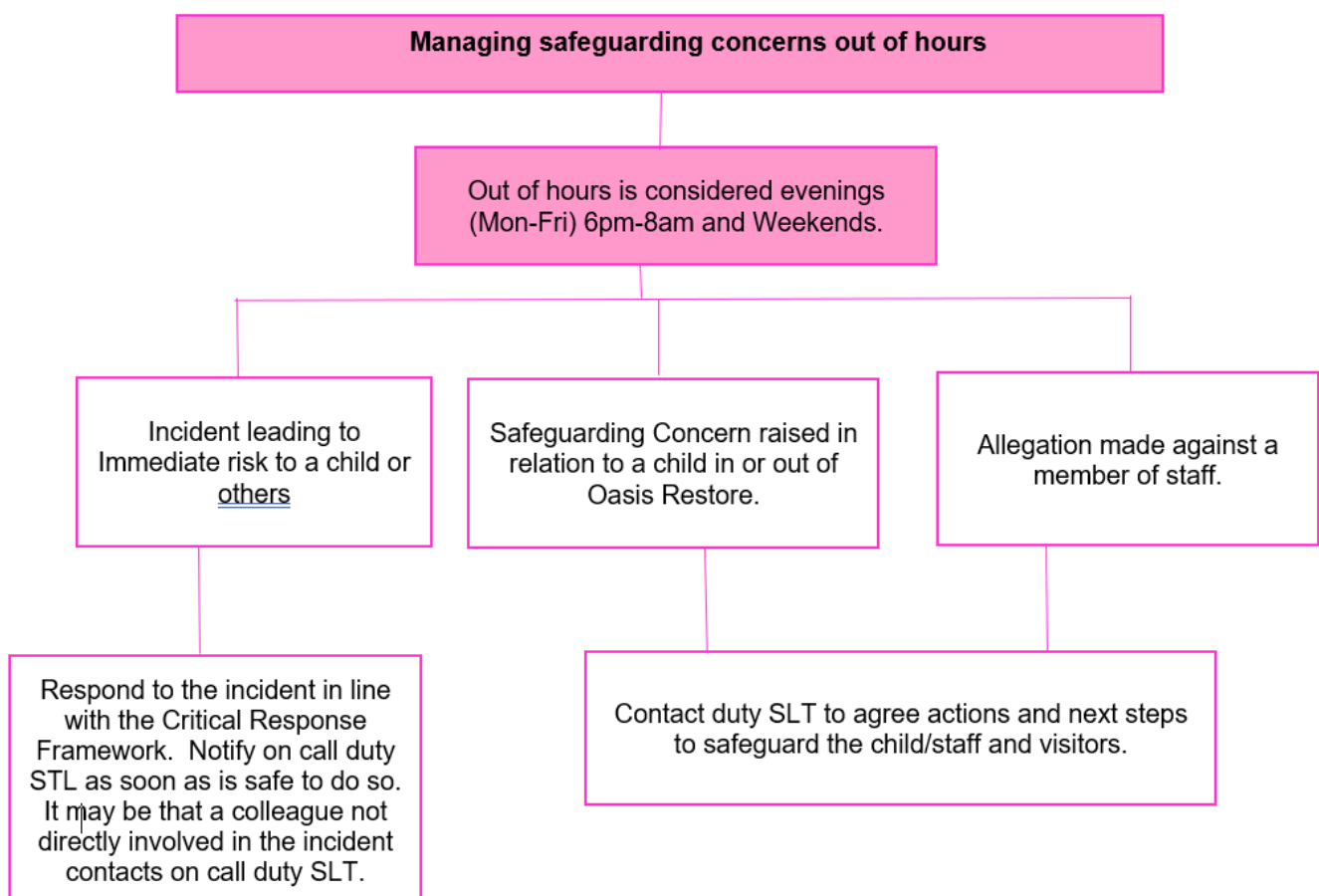
# How to guide

## Effectively manage a safeguarding disclosure out of hours

### Overview

Out of hours is considered to be 6pm – 8am, Monday to Friday and weekends. During this time the below should be followed.

### Step by step guidance





# How to guide

## Effectively manage concerns regarding a location at Oasis Restore

### Overview

Safeguarding children in Oasis Restore goes beyond the child/children involved, we need to consider the wider context of an incident or concern to fully understand and prevent risk. One of the most significant elements of this is the spaces and places in which an incident or risk occurs.

By considering the context in which harm takes place we have a better understanding as to the cause, how to manage the current risk and provides better opportunities to disrupt future harm.

In Oasis Restore every child will have an allocated core team who will collectively be responsible for the care, safety and wellbeing of the child. Each core team will need to consider not only the child, but the context, spaces and places surround that child when assessing and considering risk.

Where there are concerns about a location in the school that has come to light through incident reporting, thematic review, intel or the voice of children and staff these locations will be allocated to a Restore Networker to complete an assessment of the location developing a plan to disrupt/reduce any identified risks.

Where concerns are raised about locations external to Oasis Restore the safeguarding team will refer these concerns to the relevant Local Authority and Community Safety Team for the area.

### Location Assessment

We must also consider the wider context, spaces and places in which harm takes place, we must understand these factors and unpick what it is about them that may have contributed or prevent harm occurring.

As a result we will consider the context (time, day, season, weather, child's personal context) as well as the spaces and place in which concerns arise during every incident. Where concerns arises specifically about a location in or around the school or we identify emerging patterns/trends we will complete a location assessment.

This assessment will:

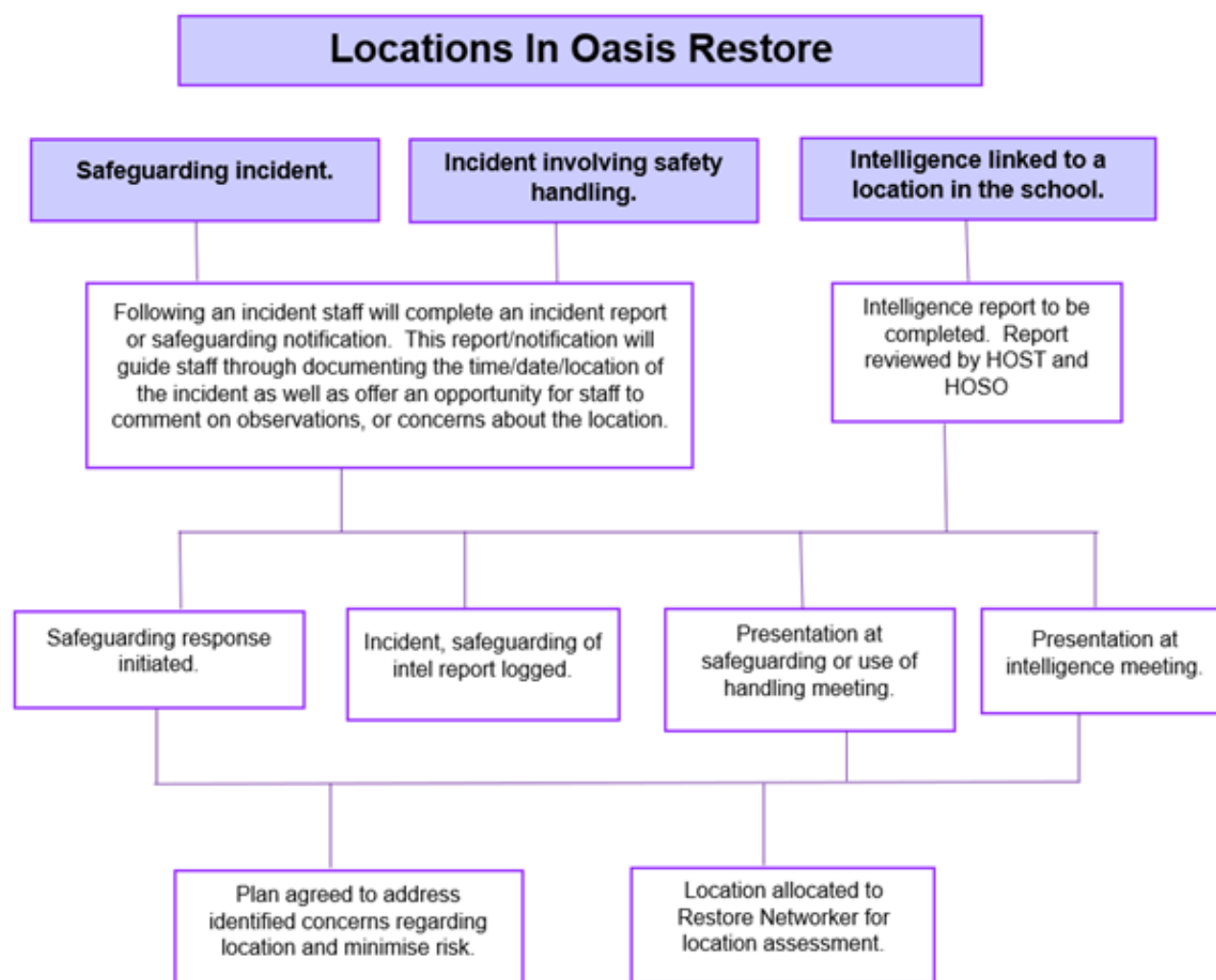
- Review incidents.
- Listen to children's views.
- Listen to staff's views.
- Consider and environmental factors.
- Identify elements of commonality and difference.
- Identify areas of risk and mitigation.
- Take into consideration any intel that can be shared and relates to the location.

From which an analysis will be drawn, and an action plan developed. Action Plans may include things such as:

- Increased staffing or viability of staff
- Change in movement routine.
- Restorative practice between children/staff etc
- Better lighting, CCTV coverage etc.

These assessments and plans will be completed by the Restore Networkers and authorised by the Head of Safeguarding and Transitions. These location assessments will feed into an annual contextual risk assessment completed by the Head of Safeguarding and Transitions.

This will consider the context of the school and homes as a community, creating a thematic review of contextual data, reviewing the success of action planning, diversion and disruption of risk. It will importantly gain an understanding from children, staff and visitors about safety in Oasis Restore, and listen to ideas about how to continue, improve and learn. This will inform a contextual safeguarding plan for the year ahead.



## How to guide

# Understand and manage concerns around exploitation

## Overview

Exploitation in all forms is abuse, exploitation occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child (or adult) into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Exploitation comes in many forms and is commonly categorised in to 4 key elements outlined below. It is essential that we remember that each element does not only exist in isolation and often there can be multiple forms of exploitation taking place simultaneously.

### **Criminal Exploitation**

Criminal Exploitation is a broad term used for any form of exploitation that involved victims being involved in criminality. It is commonly associated with gang affiliation and county lines, it is however also linked to a much wider range of criminal behaviours: financial crime such as “squares”, robbery, youth violence, burglary, forced labour etc.

Criminal Exploitation is often seen as children making “bad choices” or children being seen as “in with a bad crowd” and the exploitation is often missed consequently. There is also often a significant gender bias in relation to criminal exploitation and it is often associated to boys, which has an impact on us missing other forms of abuse for boys but also missing this form of exploitation for girls.

### **Human Trafficking and modern slavery**

Human Trafficking is the movement of a person from one place to another for the purpose of exploitation. This movement can be locally, nationally, or internationally. Trafficking is often used for movement of children and adults for criminal and sexual exploitation, forced labour, and organ harvesting.

### **Radicalisation**

Radicalisation is the process in which a child or adult is coerced into adopting radical positions on political or social issues and comes to support terrorism and extremist ideologies. In the UK the most common forms of terrorism are extreme right-wing terrorism (inspired by groups such as National Action and Atomwaffen Division) and Islamist terrorism (inspired by groups such as Daesh or Al Qa’ida). Where we have concerns about radicalisation we must refer to Prevent as part of our safeguarding response.

### **Sexual Exploitation**

Sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Child Sexual Exploitation does not always involve physical contact as it can occur through the use of technology. This can affect any child or young person (male or female) under the age of 18 years. The age of consent is immaterial in CSE – it is child abuse.

Like with criminal exploitation this is complex and often children are described as being “sexually active” when in fact they are being exploited. Sexual exploitation is never consensual, even if the child never said no, the power and control over them supersedes the perceived consent and means that their capacity to say no is greatly impacted and comes with huge consequences for the child. Whilst sexual activity is common through adolescence it is vital that we remain alert to indicators of sexual exploitation and that we support children to understand healthy relationships and signs of exploitative behaviours from potential exploiters. As with criminal exploitation there is commonly a gender bias of sexual exploitation being an issue for girls, and often this leads to us not identifying this abuse for boys.

### **Mechanisms used to exploit children**

Debt bondage is a significant risk for children and their families and is a strategy to. Debt bondage is used to tie children into a cycle of exploitation.

- A debt is accrued, that the child is then expected to pay off through any form of exploitation: criminal activity, sexual abuse, forced labour etc. This debt can be accrued in a number of ways some of which are outlined below:
- Children are addicted to a substance (often part of the reason they are exploited) and then use the drugs/spend the cash.
- Children are set up to be robbed by those exploiting them leading to the debt.
- Children are robbed.
- Paying back debt accrued from trafficking – commonly seen with international trafficking victims who are exploited by those who facilitate them arriving in the UK and are forced to “pay back” an undefined debt.

Confiscation of drugs/money by police as part of an arrest can often lead to children being in significant debt. Whilst professionals around them feel there is safety due to police intervention and removal of drugs sadly the risk has increased as children now owe their exploiter for the loss.

This may be a common issue for children entering into custody where they may now have significant debts that they are expected to pay off either whilst they are in custody or upon release.

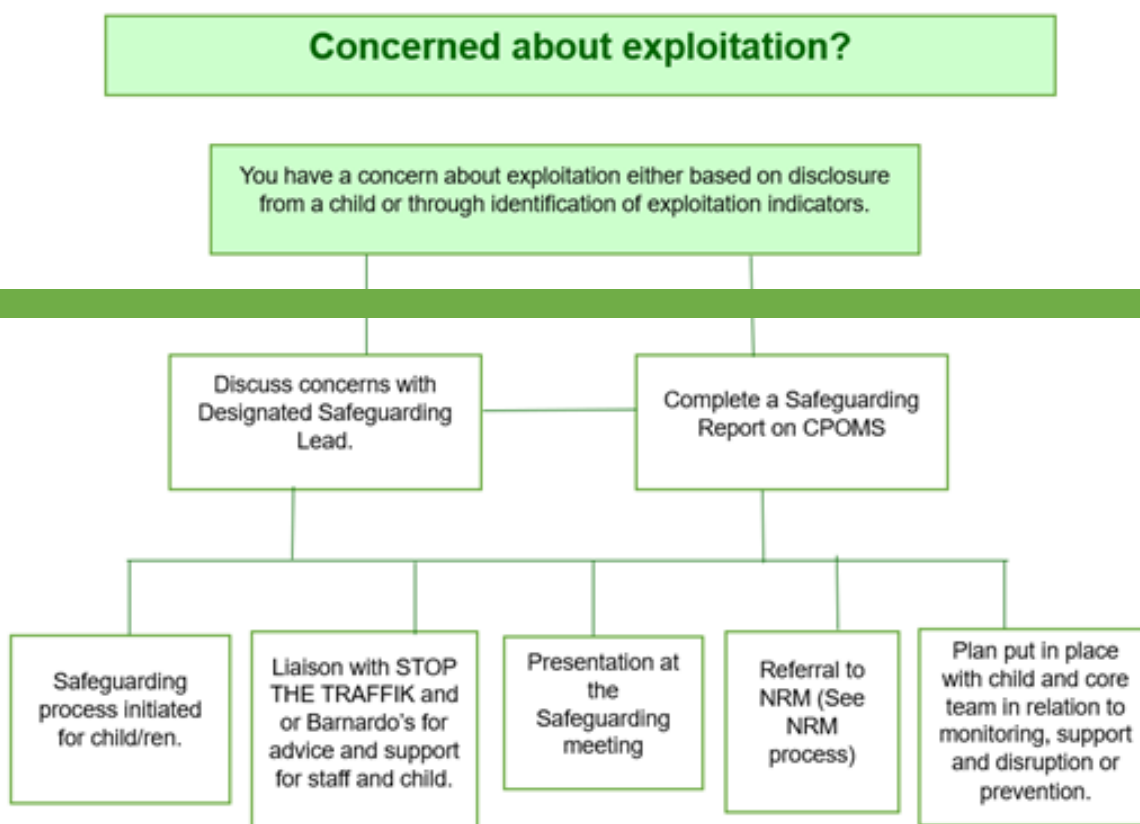
Push and pull factors are often relied upon by adults wishing to exploit children.

- PUSH Factors are things that push them away from the home increasing risks and opportunity for exploitation, for example abuse, poverty, poor relationship, low self-esteem, unmet needs.
- PULL Factors – factors outside of the home that pulls children further into exploitation and away from the home, attention, love, gifts, money, promises of change in life circumstances. These can often intertwine, and factors can act both as push and pull.

These factors are often used as part of the grooming process. CEOP 2022 define grooming as involving “the offender building a relationship with a child, and sometimes with their wider family, gaining their trust and a position of power over the child, in preparation for abuse.”

Grooming often leads children to develop a deep sense of loyalty for those that exploit them. This can also be borne out of shared (or believed to be shared) experiences and trauma, children believing that no one else would understand or they were there for the child when it felt like no one else was.

### What to do if you are worried about exploitation?



### Key Reminders

- The best people to understand the environments that children and young people live in, and the challenges they face, are the young people themselves. Create a safe space and start conversations with them about their experiences.
- There are many crossovers between contextual safeguarding and exploitation – there are also crossovers between the push and pull factors for children, we must keep an open and non judgmental mind.
- Read the research by Durham University/Contextual safeguarding here for more information and strategies to support children (<https://www.contextualsafeguarding>)

