



## **Safeguarding Policy**

*“Safeguarding is everyone’s responsibility”*

*Working Together to Safeguard Children 2018* (DfE July 2018) and *The Children Act 1989* define the safeguarding and promoting of children and young people’s welfare as:

- Protecting children from maltreatment;
- Preventing impairment of children’s health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- Positive action to enable all children to achieve the best outcomes.

AFA recognises that the welfare of children and young people is paramount, and our duty is to:

- Protect children and young people who receive a service from AFA.
- Educate and support Foster Carers and their families to safeguard themselves, their family and the children in placement.
- Ensure that everyone is aware of their safeguarding responsibilities and that staff, independent workers and Foster Carers are familiar with relevant policies and procedures, reporting, whistleblowing and best practice.

AFA are mindful that people who are directly supporting carers and children, or caring for children, should be alert to the heightened vulnerability of a child who:

- Is disabled and has specific additional needs.
- Has special educational needs, regardless of whether or not they have a statutory Education, Health and Care Plan.
- Is a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour, including involvement with gangs and association with organised crime.
- Is frequently missing/goes missing from care or from home.
- Is at risk of modern slavery, trafficking or exploitation.
- Is at risk of being radicalised or exploited.
- Has lived in family circumstances which have created challenges and risks for the child, such as exposure to drug and alcohol misuse, adult mental health issues and domestic violence.
- Has returned home to their family from care.
- Is misusing drugs or alcohol themselves.

### **AFA Fostering's aims are:**

- A commitment to provide safe, caring and professional foster care for every child placed with AFA, recognising the particular vulnerability of children with disabilities;
- To ensure that children feel safe and protected and that they are safe;
- To celebrate the diversity of gender, ability, language, sexuality, ethnic origin, faith and culture. AFA believes that every adult and child should be respected and valued;
- To offer placement choice to ensure that children are matched to carers who can meet their needs;
- To work closely with colleagues and other professionals to ensure that every child placed is provided with a care experience that gives them the opportunity to succeed;
- To support carers to provide care which improves the life chances of children and young people and helps them to be healthy, stay safe and make a positive contribution to society.

### **AFA will achieve these aims:**

- By children and young people being facilitated to communicate their wishes and feelings about decisions that affect them and, where these cannot be acted on, to be given a clear and honest explanation;
- By supporting children and young people to develop their self-care and independence skills, commensurate with their age and understanding;
- To help them to take appropriate risks as a normal part of growing up and to reach their full potential, playing an active role in society;
- By supporting children to recognise risk and develop the ability to protect themselves from harm or abuse.
- By ensuring that all staff working with Foster Carers and the children living with them, are qualified and experienced and prioritise safeguarding for every child in our care;
- By considering staff, Foster Carers and independent workers as 'people in positions of trust' and to manage safeguarding arrangements, including Safer Recruitment practices;
- By Foster Carers being supported to care for children to the best of their ability by Placement Managers providing a high standard of supervision, regularly discussing issues relating to risk and safeguarding;
- By supervising staff who are supporting Foster Carers, to ensure they routinely discuss safeguarding practice. This should include reviewing those young people seen as 'at risk' by their inclusion on the AFA Risk Register;
- Commitment to ongoing training for all staff, independent workers and Foster Carers to ensure awareness of their responsibilities and promote best practice;
- The Safeguarding Lead and other Senior Managers to ensure they have an awareness of the key safeguarding partners within each Authority, as well as the arrangements for individual Agencies working together;
- The Safeguarding Lead to ensure best practice and learning is regularly shared with the staff group, particularly those cases relating to Child Death Reviews and Serious Case Reviews.
- By ensuring that children, young people and Foster Carers who are dissatisfied with the service or support provided, will be given advice and information on the complaints procedures for AFA and regulatory authorities. In addition, information regarding advocacy services will be routinely given to all children placed, in a format they can understand and easily use.

## **Risk Assessment of Children and Young People**

*AFA will implement a proportionate approach to risk assessment.*

It is anticipated that all children and young people referred to AFA will have a current risk assessment, completed by their referring Agency. This should clarify the child's needs and provide information that will enable the best match to be made. If a risk assessment has not been forwarded, the Duty Coordinator will request this from the Local Authority Placement Team.

After a child had been placed with an AFA carer, the Agency's Placement Manager (Supervising Social Worker) for that family will update the Safer Caring policy to consider any specific needs or risks identified at the point of the initial referral. The Placement Manager will consult with the child's Social Worker where this is considered necessary, and the Safer Caring policy should be discussed at the Placement Planning Meeting.

It is important to ensure that any risk assessment allows scope for risk taking and consequential learning for children, to support them in their development and learning how to keep themselves safe.

AFA recognises the importance of continuing to consider safeguarding issues for the children in our care, and their respective foster families, throughout the duration of the placement. Therefore, the risk assessment will be reviewed at each Looked After Review. The setting should facilitate contributions from other professionals and ensure the risk assessment includes the most recent information available.

Any amendments to a risk assessment will be documented on the Agency's risk assessment form and entered on the child's electronic record (CHARMS). A copy will be sent to the Local Authority Social Worker and anyone else who, it has been agreed, can have access to the information. Any proposed changes will be considered with the carer before updating takes place. Safer caring and safeguarding will always be discussed at each carer's monthly supervision meeting.

The risk assessment may also be reviewed if any of the following have occurred:

- Where a child has placed themselves or others at significant risk.
- Where a change in a child's health needs has increased an existing risk.
- Where a criminal offence has been committed.
- Where there is reasonable cause to suspect that a child has suffered or is likely to suffer significant harm, and/or a criminal offence may have been committed.
- Where a young person meets the criteria for a Schedule 7 notification.
- Where there is a serious threat to a child's life.

In all such situations, the child's Social Worker, based in the Local Authority, must be informed in a timely manner that the level of perceived risk has changed, and a new assessment is to be completed. If the risk is manageable within the family, considering any additional support or training that can be offered, the Safer Caring policy for the carers must be amended to reflect any concerns. However, if there is a significant risk and the placement is no longer felt to be manageable, AFA will attempt to put interim measures in place that will maintain the placement so that a planned move can take place. In such a situation, liaison with the Local Authority Social Worker and Placement Team is vital.

In addition, the details of those seen at significant risk will be included on the AFA Risk Register. This is to ensure adequate monitoring of children who could be seen to be at risk or considered to be risky in their behaviour.

## **Criteria for inclusion on the Risk Register**

The following children or young people will be included on the Risk Register:

- Any child who is identified at risk of or subject to CSE either via the completion of CSE toolkit, assessment by external professionals, meeting or at the point of referral
- Any child who has been known to self-harm on more than 2 occasions in the last 6 months.
- Any child who has threatened suicide in the last 12 months
- Any child who has made an allegation against a carer (current or former), or other significant person in their lives in the last 6 months
- Any child who has been absent or missing from placement on more than one occasion in the last 6 months
- Any child who is seen to be at significant risk from people in their family or network, such as risk from parents. This risk must be significant.
- Any child who is seen to engage in significantly risk-taking behaviour, e.g. criminal behaviour, drug or solvent use, eating disorders etc
- Any child who has been charged with a criminal offence over the 12 months
- Any child involved in a child protection investigation at the current time
- Any child who has experienced significant harm as a result of the actions of others within their network (e.g. at school, in the community)

## **Safer caring**

### **Statutory framework**

Regulation 12 (1) of the Fostering Services (England) Regulations 2011 requires Fostering Service Providers to prepare and implement a written policy which is intended to safeguard children placed with Foster Carers from abuse or neglect.

### **Aims and objectives of Safer Caring Policies**

Safer Caring Policies contribute towards:

- Keeping children safe from abuse by adults in the household.
- Keeping children safe from abuse by other children in the household.
- Keeping children safe from accessing inappropriate material in print, television, video, games or online.
- Minimising to an acceptable everyday level the risk of accident and injury within the household.
- Keeping members of the foster family safe from allegations of neglect and/or abuse.

### **Application of Safer Caring Policies**

A Safer Caring Policy must be completed and kept up to date by AFA for every Looked after Child in placement. A generic policy will be completed with carers during their assessment and an individual policy for each child placed will be written during, or immediately following, a placement planning meeting. At this point, there is an expectation that the needs of the individual child have been considered and a risk assessment completed by the Local Authority has been received.

A copy of the carer's policy in respect of each Looked after Child will be placed on both the child and the carer's electronic file by the Placement Manager. If the child is of sufficient age and understanding, the policy should be shared with the child.

## **Review of Safer Caring Policies**

The Safer Caring Policy will need to be revised as the circumstances of the household and the children in placement change. The risk assessment for each child or young person should be updated alongside the Safer Caring Policy (see 'Risk Assessment of Children and Young People Policy').

The policy should be amended and circulated as soon as practical:

- Whenever there are significant changes.
- At the time of the child's Looked After Review or
- The Foster Carer's annual review.

There are no definitive criteria as to what constitutes significant harm. However, CoramBAAF identify the following as key indicators:

- The degree and extent of physical harm;
- The duration and frequency of abuse or neglect;
- The extent of premeditation;
- The degree of threats and coercion;
- Evidence of sadism, and bizarre or unusual elements relating to child sexual abuse.

## **Thinking about the uniqueness of each family**

The strategies that families have in place to make sure that everyone stays safe in the home will vary from family to family. In most families, these strategies are unwritten and frequently unspoken. Children learn how the family operates as part of their day-to-day development and generally accept this as the 'norm', as they may have limited experience of any other households.

However, Foster Carers need to be aware of the strategies they use for two reasons:

- Firstly, carers need to consider the potential impact of the way the family functions on a child joining the household. Adjustments are likely to be needed, but carers will need to think of ways to minimise the disruption to family routines whilst being responsive to the needs of the child coming into the family.

The child to be placed will have previous experience of family life, and the strategies used in their own homes may be very different to those agreed in the foster home. Some children will come from chaotic households where there are few boundaries and adjusting to a more formal setting may be difficult for them. Others may come from a very rigid and structured background where they have had little control over their own lives. In such circumstances adjusting to new-found freedoms can be problematic.

- Secondly, carers will need to identify behaviour or practices within their own household that might be acceptable to them but could increase risk in a foster home – some accepted behaviours, which are perfectly acceptable in families could put both children and carers at risk in a foster home.

## **Developing Safer Caring Policies**

A Safer Caring Policy does not mean changing everything that carers are currently doing. The policy provides an opportunity to reflect on how the household operates and what needs to change to ensure that children and household members are protected. Where there is a possibility of loss, danger or injury, carers need to work with the Placement Manager to develop strategies to minimise identified risks.

The aim of the Safer Caring Policy is not to create a complicated or rigid set of rules for all those living in the fostering household. The policy should be as concise and clear as possible, aiming to give a child the experience of living in a family whilst ensuring ‘... they are growing up in circumstances consistent with the provision of safe and effective care’ (CoramBAAF). For further information see the Foster Carer Handbook and Placement Manager’s Process Guide.

## **Recording**

One of the most effective ways that carers can protect themselves from allegations is to ensure they record regularly with sufficient level of detail. AFA uses a system (Charms) to record, which is available to all Foster Carers. This is regularly checked and discussed during supervision with the carer’s Placement Manager. Carers need to record on either a daily or weekly basis based on several factors, such as the stability of the placement or the length of time the child has been placed. Good records can provide a valuable resource as they:

- Provide a history of work undertaken with the child
- Record decisions made and the child or young person’s views
- Protect the child and the fostering household
- Provide continuity if the child’s Social Worker or carer’s Placement Manager leaves
- Help carers and other professionals review the work carried out, aiming for best practice and consistency

## **E-safety and Safe use of Images**

AFA strongly believe that children and young people should have access to the Internet and technology, but we also recognise the importance of safeguarding children from potential risk when using the Internet. This policy aims to identify how carers can keep children and young people in the home safe.

**Parental control software** - Adequate parental control software must be installed on the Internet service provider and/or on any computers children have access to, along with up to date anti-virus software and recognised Internet security software. There is further guidance on parental controls in the Foster Carer’s handbook.

**Monitoring a child’s use of the Internet** – There should be a discussion at the placement planning meeting on how Foster Carers can manage the frequency and duration of Internet use by children. (For further information see the Placement with Foster Carer’s Policy).

AFA run regular training on Internet safety, which is facilitated by a CEOP ambassador (Child Exploitation and Online Protection). The course provides additional information and practical advice on all areas covered in the safeguarding section of the Foster Carer’s Handbook.

AFA recognise that children can be more vulnerable if they are using electronic equipment in their own personal space, such as a bedroom. If this is the case there needs to be robust safeguards in place to limit access to the Internet, both duration and content. Mobile phones should be set up with the aim of protecting young people as, for example, they can be used to facilitate contact with family members, including those who pose a serious risk to a child.

This is a very challenging topic for carers and needs to be discussed at the placement planning meeting and reviewed throughout the placement. The most effective protection is for carers to help children and young people understand the risks associated with accessing the Internet. This is best done through open discussion and trusting relationships, with carers ensuring everyone in the home uses IT responsibly.

**Use of Images** - Carers should discuss the taking of photographs and videos with the child's Social Worker when the child is first placed. If the child is of sufficient age and understanding their consent should be sought before any photos or recordings are made. No child should be photographed or filmed in the bath, in their night-clothes or underwear, or undressed.

The Placement Plan must state who can give agreement for any recording and should be discussed using the delegated authority decision making toolkit. No images or information relating to a child or young person or their family should be placed on any social media site at any time. Should it come to AFAs attention that images have been circulated online a standard of care enquiry may be initiated.

## **Child protection and Safeguarding referrals**

The welfare and safety of children is a shared responsibility and AFA believe it is unacceptable for a child or young person to experience abuse or neglect at any time in any setting. AFA recognises its legal and ethical duty to safeguard the welfare of children, to protect them from harm and respond quickly where there are concerns that a child is, or may be, suffering significant harm. AFA works in partnership with Local Authority Children's Services, Police and other relevant agencies to ensure that child protection concerns are handled sensitively and professionally with the best interests of the child at the forefront of any decision making.

The key principles of safeguarding are that:

- Children have a right to be safe and should be protected from all forms of abuse and neglect
- Safeguarding children is everyone's responsibility
- Children are best protected when there is a coordinated response from all relevant agencies

Further information can be obtained from the Department of Education website (see below for links).

This policy is also relevant to the recruitment and employment of staff and Foster Carers, employee and carer conduct and disciplinary procedures, health and safety policies and confidentiality. Where there are concerns that a child in an AFA placement has suffered, or is likely to suffer, significant harm because of actions, committed or omitted, by a Foster Carer or member of staff, the Managing Allegations against Staff and Foster Carers procedures must be followed.

This policy addresses concerns regarding Child Protection, which must be robustly addressed regardless of the status of the alleged abuser, including the child's family or friends, carers, known or unknown adults, AFA or other Agency employees or unrelated children and young people.

## **Reporting concerns or allegations**

For concerns or allegations relating to AFA Foster Carers, independent workers or members of staff, see the 'Managing Allegations against staff and Foster Carers' and 'Whistleblowing' Policies. These outline our responsibilities relating to safeguarding for those who are in positions of trust.

All concerns or allegations regarding a child placed with an AFA Foster Carer must be reported at the earliest opportunity to the Designated Safeguarding Lead or, if outside of office hours, the On-Call Manager. This includes concerns or allegations about another child, a visitor to the foster home, the child's family, a teacher, Social Worker or any other persons. The Designated Safeguarding Lead is the Manager available to support staff members raising a concern. This may be the Line Manager for the staff member or another Manager from within the Agency.

Where the concern or allegation relates to historical abuse a referral should still be made. It should not be assumed that the allegation has been previously raised or addressed.

The Designated Safeguarding Lead will complete a notification to Ofsted as per Schedule 7 of the Fostering Regulations 2011. Please see separate policy for further information.

## **Recording**

Recording relating to any concerns, allegations or action taken by the Agency must be entered on the Agency database (Charms) within 12 hours of the information first being raised. The Placement Manager for the Foster Carer, where the child or young person is placed, is responsible for making a clear record, specifying the name and status of those spoken to. If this is not possible the Placement Manager must speak with their Manager or the Designated Safeguarding Lead giving reasons as to why they cannot meet the recording deadline.

Foster Carers also need to complete recordings relating to any concerns or allegations within the above timescale. If they are unable to do so, they should contact the Placement Manager in the first instance, or subsequently the Designated Safeguarding Lead.

Please refer to the Record Keeping and Confidentiality policy for further information and guidance.

## **Immediate Risk**

If a child needs urgent medical attention or protection, the Foster Carer must act immediately. This may include calling the emergency services and informing them that a child has experienced or is at risk of experiencing significant harm.

The Foster Carer should contact the Placement Manager, or whoever is on duty as soon as they become aware of the need to take emergency action. This should not take precedent over responding to a child's safety and welfare but contact with the Placement Manager should be made as soon as practical.

The Designated Safeguarding Lead, or in their absence another Manager in the Agency, must be contacted by the Placement Manager to whom the Foster Carer has spoken.

Once the immediate risk to the child is addressed the following procedures must be followed:

## **Referring Concerns to Children's Social Care and Safeguarding Partners**

When contacted by a Foster Carer or Placement Manager regarding a concern or allegation, the Designated Safeguarding Lead or on-call Manager must decide if a referral should be made to Children's Social Care. The referral must be made to the Local Authority where the child is placed, in line with Local Safeguarding Procedures. The Designated Safeguarding Lead will have information on how to contact Safeguarding Partners.

A verbal referral to Children's Social Care must subsequently be made in writing, and feedback given on any action taken within 48 hours of the Local Authority being contacted. If no feedback is received within this timescale, the Designated Safeguarding Lead should contact Children's Social Care to establish what action has or will be taken.

If there are concerns regarding the response to the referral made to Children's Social Care, the Designated Safeguarding Lead should contact the relevant Manager of the Children's Social Care team who is dealing with the referral. Contact between everyone involved in making the referral, including those who initially expressed concern, must be comprehensively recorded.

The following should also be notified when a referral has been made:

- The child(ren)'s Social Worker has the responsibility to notify the child's parents and carry out any actions required to protect the child(ren) e.g. deciding whether it is necessary for the child to change placement.
- The Regulatory Authority, if a Section 47 Enquiry is initiated;
- AFA Decision Maker

Under no circumstances should information about the concerns or allegations be shared with anyone to whom the referral relates. As and when this is felt to be necessary, it is the responsibility of the Local Authority to liaise with relevant agencies and decide what information will be shared.

Information about any action taken should be shared with the child's carers and other relevant members of staff within AFA on a need to know the basis. All those who are aware of the allegations or concerns should be reminded of the AFA policy relating to confidentiality.

Where there are concerns relating to significant harm to a child, which leads to an Initial or Core Assessment by Children's Social Care, any information held by AFA about the child will be openly shared with Children's Social Care.

### **Section 47 Enquiries**

AFA will cooperate fully with Children's Social Care should a decision be made to undertake a Section 47 Enquiry (Children Act 1989). This will include attending Strategy Meetings as required and sharing information from case records.

AFA and the relevant Local Authority must identify who will be responsible for liaising with the Regulatory Authority.

### **For further information see:**

- Fostering Services (England) Regulations 2011
- Children Act 1989: Guidance and Regulations Volume 4
- Children Act 2004
- National Minimum Standards 2011
- Care Standards Act 2000
- Working Together to Safeguard Children 2018 (<https://www.gov.uk>):
  - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729914/Working\\_Together\\_to\\_Safeguard\\_Children-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf)  
Working Together to Safeguard Children: a guide to inter Agency working to safeguard and promote the welfare of children 2018
  - Working Together: transitional guidance: for Local Safeguarding Children Boards, Local Authorities, safeguarding partners, child death review partners, and the Child Safeguarding Practice Review Panel
  - Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers
- NSPCC Core-Info leaflets - Evidence Based Resource relating to abuse and neglect.
- See also NSPCC 'Knowledge and Information Service' for the key changes in the Working Together to Safeguard Children (2018) guidance ([nspcc.org.uk/research](http://nspcc.org.uk/research)).
- [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk) for information on Internet safety and other identified risks.
- Children and Social Work Act 2017

### Connected Policies or guidance

<b>Name of Policy / Guidance</b>	<b>Relevant for</b>
Record Keeping and Confidentiality Policy	All staff and Foster Carers
Foster Carer Handbook	Foster Carers, Placement Managers
Placement Managers Guidance	Placement Managers, Senior Managers
Whistleblowing Policy	All staff and Foster Carers
Equal Opportunities Policy	All staff and Foster Carers
Assessment and Approval of Foster Carers	All staff and Foster Carers
Changes in Fostering Households and Policy on Changes in Relationships	Foster Carers, Placement Managers and Senior Managers
Expectations of Foster Carer's Behavior	All staff and Foster Carers
Participation Policy	Children and young people, Foster Carers and all staff
Behaviour Management Policy	All staff and Foster Carers
Safeguarding Children Against Bullying	All staff and Foster Carers
Safeguarding Children Against Radicalisation	All staff and Foster Carers
Safeguarding Children against Trafficking	All staff and Foster Carers
Safeguarding Children against Child Sexual Exploitation	All staff and Foster Carers
Safeguarding Children Against Female Genital Mutilation	All staff and Foster Carers
Safeguarding children against Gang Activity	All staff and Foster Carers
Children Missing from Care	All staff and Foster Carers
Managing Allegations Against Staff and Foster Carers	All staff and Foster Carers
Notification of Significant Events	Placement Managers and Senior Managers
Placement with Foster Carers Policy	Foster Carers, Placement Managers
Delegated Authority Policy	Foster Carers, Placement Manager

**This policy was amended in January 2020 and will be reviewed in January 2021. Additional amendments will be made as and when required.**