

Independence Project Safeguarding Children and Young People Policy and Procedures

Independence Project Safeguarding Statement:

Independence Project is committed to safeguarding and promoting the welfare of Children, Young People and Vulnerable Adults and expects all staff, volunteers and partners to share this commitment. All post holders are subject to a satisfactory enhanced check with the Disclosure and Barring Service. Staff are also required to register with the DBS Update Service to enable regular follow-up checks.

The policy and procedures apply throughout Independence Project:

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

Working Together to Safeguard Children, HM Government, July 2018, page 10.

[n.b. the term child/children refers here to all young people under 18 years of age]

This policy applies to all staff, including senior managers, paid staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of Independence Project.

This policy should be used in conjunction with current version of the *Southend, Essex and Thurrock Safeguarding and Child Protection Procedures* (usually known as the SET Procedures), downloadable from the Essex Safeguarding Children Board website: www.escb.co.uk

The purpose of this policy:

- To protect children and young people who receive Independence Project services. This includes volunteers under 18 years old, and children of adults using our services.
- To provide staff and volunteers with the overarching principles which guide our approach to safeguarding children and young people.
- To ensure that everyone working with Independence Project, and anyone receiving support from us, is aware of the responsibilities they and others have and knows what to do if harm or injury is suspected or is discovered.

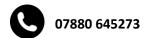
Independence Project believes that a child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children & young people and to keep them safe. We are committed to practice in a way that protects them.

We recognise that:



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- The welfare of the child/young person is paramount.
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

Concept of significant harm:

Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children, and gives local authorities a duty to make enquiries (section 47) to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

In addition, harm is defined as the ill treatment or impairment of health and development. This definition was clarified in section 120 of the Adoption and Children Act 2002 (implemented on 31 January 2005) so that it may include "impairment suffered from seeing or hearing the ill treatment of another" for example, where there are concerns of domestic abuse.

"There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements." [From SET Procedures May 2019, 1.1.2]

Descriptions/types of abuse:

Child abuse is the term used when an adult (or another child/young person) harms a child or a young person under the age of 18. There are four main kinds of abuse, all of which can cause long term damage to a child. The main types of abuse are:

1. Physical abuse

This is when a child is hurt or injured by a child or an adult. Physical abuse includes hitting, kicking, punching and other ways of inflicting pain or injury such as poisoning, drowning or smothering. It also includes giving a child harmful drugs or alcohol.

2. Emotional abuse

This is when adults deny children love or affection, or constantly threaten or humiliate them. Sarcasm, degrading punishments and ignoring a child are also forms of emotional abuse and undermine a child's confidence and sense of self-worth.

3. Neglect

This is when a child's basic need for love, food, warmth, safety, education and medical attention is not met by parents or carers.

4. Sexual abuse

This is when a child is used sexually by one or more adults or young person(s). Sexual abuse



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can include kissing, touching the child's genitals or breasts, vaginal or anal intercourse and oral sex.

Sexual abuse may not involve physical contact. Sexual abuse also includes encouraging a child to look at pornographic magazines, videos or sexual material on the internet, and other forms of sexual activity online or via mobile phone, including sending or sharing sexual images of children, or encouraging children to share them – photos/videos, 'sexting'.

Bullying, racism and other types of discrimination are also forms of child abuse. Like other kinds of abuse they can harm a child physically and emotionally.

[Descriptions were originally adapted from Safe Network (NSPCC). Full descriptions and definitions are given in *Keeping Children Safe in Education*, DfE, 2018 pp.14-15: https://www.gov.uk/government/publications/keeping-children-safe-in-education--2]

Independence Project has a separate e-safety policy to help protect the children and young people who use our services and who make use of information technology.

Other types of abuse

For **full descriptions** on types of abuse/significant harm and how to recognise them, please also refer to Section A.1.3 and Part B3 of the current *SET Procedures*.

Further details about types of abuse/significant harm are also included within the training provided to frontline staff, (beginning with ESCB Level 1 online training during induction), and volunteer induction training (safeguarding awareness training, developed from ESCB training materials). If in doubt, staff or volunteers should contact the Designated Lead for Safeguarding, or Deputy.

Violent Extremism, Radicalisation and the PREVENT Duty are discussed in Part B3: 28.10 of the current *SET Procedures*, and in the SET PREVENT Policy & Guidance: http://www.escb.co.uk/media/2008/set-prevent-policy-guidance-v7.pdf Please also refer to:

- Prevent Duty Statement: http://www.interact.org.uk/about-us/safeguarding
- The Counter-Terrorism Strategy (CONTEST) 2018. This supersedes the Prevent Strategy (2011): https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018

Independence Project seeks to keep children & young people safe from harm by:

- Valuing them, listening to and respecting them.
- Adopting safeguarding children practices through procedures and codes of conduct for staff and volunteers.
- Developing and implementing an effective e-safety policy and related procedures.
- Providing effective management for staff and volunteers through supervision, support and training.
- Recruiting staff and volunteers safely, ensuring all necessary checks are made.
- Sharing information about safeguarding children and good practice with children, parents, staff and volunteers



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- Ensure that safeguarding information is available for people that use services and family members, setting out what to do if they have a concern
- Sharing concerns with agencies who need to know, and involving parents and children appropriately.

Independence Project safeguarding priorities:

Independence Project exists to support and benefit disadvantaged people, including those with disabilities and additional needs. The very first priority of the organisation is to ensure that the young/vulnerable people who use our services are safe and well cared for – and that we fulfil our duty of care to **all** young people, both clients and volunteers.

- We will always seek to work in a positive partnership with parents/carers, staff, volunteers and all other interested parties in a way that ensures that this priority is maintained in accordance with statutory guidance and the Southend, Essex and Thurrock Child Protection Procedures, usually known as the 'SET Procedures'.
- We will work to ensure that a safe and caring environment is provided and to ensure, so far as possible, that the young people are given the knowledge and skills with which to protect themselves, or obtain support and protection to safeguard their welfare.
- Independence Project will appoint a 'Designated Manager for Safeguarding and Child Protection Matters' (referred to in this document as 'Designated Lead Safeguarding')
- In addition to this Policy, and the procedures, guidelines and code of conduct within it, Independence Project has specific 'Professional Boundaries & Relationships' policies.

The Policy also includes a 'Code of Conduct', which aims to protect staff and volunteers from undue suspicion by ensuring good practice at all levels.

 All staff and volunteers working for Independence Project, who may have the possibility of unsupervised access to children, will be appropriately reference checked, and checked with the Disclosure and Barring Service.

Safeguarding children and young people with disabilities

Independence Project works with children and young people with Special Educational Needs and Disabilities and their families in many of its programmes and services. Evidence on the extent of abuse among disabled children suggests that disabled children are at increased risk of harm or abuse, and that the presence of multiple disabilities appears to increase the risk of both abuse and neglect.

Where there are concerns about the welfare of a disabled child or young person, they should be acted upon in the same way as with any other child. Knowledge and skills in safeguarding, and in working with children and young people with disability, have to be brought together to ensure that disabled children receive the same levels of protection from harm as other children.

Particular attention should be paid to promoting a high level of awareness of the risks of harm and high standards of practice, and strengthening the capacity of children and families to help themselves. Measures should include:



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- Making it common practice to help disabled children make their wishes and feelings known in respect of their care and treatment
- Making sure that all disabled children and young people know how to raise concerns, and
 giving them access to a range of adults with whom they can communicate. Those with
 communication impairments should have at all times a means of being heard
- An explicit commitment to, and understanding of disabled children's safety
- Close contact with families, and a culture of openness
- Guidelines and training for staff on good practice in working with children of the opposite sex; handling difficult behaviour; anti-bullying strategies; and sexuality and sexual behaviour among young people
- Guidelines and training for staff working with disabled children aged 16 and over to ensure that decisions about disabled children who lack capacity will be governed by the Mental Health Capacity Act once they reach the age of 16

For more detailed guidance, please refer to Part B3; Chapter 18 (pp.381-383) of the current SET Procedures, and to Safeguarding Disabled Children, Practice Guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment data/file/190544/00374-2009DOM-EN.pdf

What to do: Safeguarding and Child Protection Procedures Accidental Injuries

Young people do have accidental injuries, so when you are working with a young person for Independence Project, it is important for you to be extra careful and to help guard that young person against injury or harm.

Prevention is better than cure: awareness of potential risks and how to minimise them is vital. Risk assessments should be completed and signed off prior to the activity, as appropriate.

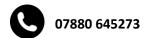
What you should do if an injury or accident occurs:

- (i) If the parent/carer is present, call the injury/accident to their attention immediately.
- (ii) Where the parent/carer is not present, administer basic first-aid if necessary, and where the resources are to hand.
- (iii) Make a written note of the injury, preferably on an Accident and Incident Report form (or you may be asked to complete this later). You should do this even where there is no visible mark. If the young person bangs into something it can be some time before the bruise comes out. This should be submitted to the Independence Project Lead Worker as soon as possible, and stored securely.
- (iv) Always advise parents/carers of any minor accident or injury immediately they return.



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- (v) If the injury is not a simple graze, bump or bruise you must inform the parent/carers or the emergency contact person immediately.
- (vi) If you suspect additionally that urgent medical attention may be necessary, do obtain this by ringing the child's GP or emergency services. Wherever possible, parent/carers or the young person's emergency contact should be involved first, and any action taken should then be in consultation with them.

Existing or previous injuries

Any existing injury or hurt to a young person should be advised to you by parent/carers when you meet them. If you are looking after a child or young person and you notice an injury that you have not been told about you should:

- (i) If required, administer first-aid or obtain medical attention as above.
- (ii) Complete an Accident and Incident Report, and a Body Map (if appropriate) to show what and where the injury is. If you need help with this, or you are unsure, please discuss it with the Independence Project Lead Worker.
- (iii) Advise the Independence Project Lead Worker or Designated Lead Safeguarding if the injury is serious, or if you are at all concerned.

Injuries you suspect may be non-accidental or a result of physical abuse.

If you notice an injury which you think may be non-accidental, or if you are not happy with the explanation that you have been given about an injury, you should:

(i) Listen to the young person and make a written record of what the young person has told you, and what you or others (e.g. parents) have asked or said.

If possible, complete an Accident and Incident Report, and a Body Map, showing the site of the injury, with a diagram of its size, shape and colour (or you may be asked to do this later). Independence Project staff should store all written records securely.

- (ii) **Avoid asking any leading questions** about any injury or abuse. It is not your role to investigate, and this may prejudice any subsequent investigation.
- (iii) Contact the Independence Project Lead Worker or Designated Lead Safeguarding as soon as possible. If no-one is available immediately, leave messages on their answerphones, outlining the concern, but avoiding confidential details where possible, and they will get back to you as soon as they can.

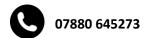
Designated Lead – Safeguarding:	07880645273
Andrew Denny	

If you have concerns about the young person's immediate safety, you should notify the



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Independence Project Lead Worker, Manager or Designated Lead – Safeguarding. They will then take appropriate action, which may necessitate contacting Social Care and/or the Police:

If Independence Project staff are concerned that an injury is non-accidental, we are required to inform Social Care and the Police. The decision as to whether to involve Social Care and Police rests with the Independence Project Lead Worker, and Designated Lead - Safeguarding. If they believe it necessary, they will ask, the same day as they are made aware of such concerns, for an investigation under local Child Protection Procedures.

Other forms of abuse, including emotional or sexual abuse

There are other forms of abuse which children all too often suffer and which can damage their lives enormously, and which may be hard to identify. These may include verbal bullying of a sustained or aggressive nature, neglect or chronic overprotection, and various forms of sexual abuse and/or exploitation. [Please refer back to 'Descriptions/types of abuse' on pages 2 & 3 in this Policy]

Abuse may occur face-to-face or online. All abuse can damage the child's development and emotional wellbeing. If you observe or suspect abuse of any kind, you should:

- (i) Make a confidential written note of why you are concerned, and of any other relevant information, as soon as possible, following the same procedures as for a non-accidental injury (see above).
- (ii) Contact the Independence Project Lead Worker, or Designated Lead Safeguarding as soon as possible, using the same procedures as for a non-accidental injury.

It is important to say again that Independence Project seeks to support families caring for young people with Special Educational Needs and Disabilities. They often do this under enormous personal pressure. It is not our aim to be intrusive, nor is it our role actively to look to uncover situations of harm or abuse.

In the unlikely event that such a situation is suspected, you should <u>not</u> share your concerns about any possible non-accidental injury or abuse with the child's parent(s)/carer(s), or with anyone other than the Independence Project Lead Worker, or Designated Lead - Safeguarding. To do so may complicate any investigation, or cause unnecessary distress.

If Independence Project staff have concerns that a child may have suffered significant harm, or is at risk of this, we are required to inform Social Care.

Where required, a Risk Assessment will be completed, e.g. using the CSE Toolbox for cases of suspected Child Sexual Exploitation: http://www.cse-toolbox.uk/; or the DASH Risk Assessment Checklist, for Domestic Abuse, Stalking and Harassment: http://www.escb.co.uk/working-with-children/domestic-abuse-marac/

The decision as to whether to involve Social Care will rest with the Independence Project Lead



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Worker and Designated Lead - Safeguarding. If they believe it is necessary they will ask, the same day as they are made aware of such concerns, for an investigation under the local Child Protection Procedures.

Confidentiality and Information Sharing

If a young person discloses any information to you relating to possible harm or abuse in any form, you should:

- **Listen** carefully to what the young person tells you. **Tell** him/her that you must pass that information on to those responsible for Safeguarding and Child Protection Procedures within Independence Project, so that they can decide what further action is needed. That may then include a duty to inform Social Care and/or the Police.
- (ii) Reassure the young person that you will respond in a way which is intended to safeguard their welfare, and protect him/her and others from further harm.
- (iii) Do not share anything disclosed to you, or any other concerns about possible nonaccidental injury or abuse, or any written records of this, with the child's parent(s)/carer(s), or with anyone other than the Independence Project Lead Worker or the Designated Lead - Safeguarding. To do so may complicate any investigation, or cause unnecessary distress.
- (iv) Where possible, and if it is safe and appropriate to do so, offer to go back to the young person, preferably with the Independence Project Lead Worker or Designated Lead -Safeguarding, to **let him/her know what action is being taken**.

Independence Project staff should also ensure that:

- They contact an appropriate Manager/Safeguarding Lead as soon as possible to agree who will need to be made aware of the concern/incident which is being reported, and the timescales for doing so
- That any sensitive information sent electronically is password protected
- All written reports records are stored securely

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Code of Conduct for staff and volunteers

You must:

- treat all children and young people with respect
- provide an example of good conduct you wish others to follow
- ensure that, whenever possible, there is more than one adult and/or peer volunteer present during activities with children and young people, or at least that you are within sight or hearing of others
- respect a young person's right to personal privacy/encourage young people and adults to feel comfortable and caring enough to point out attitudes or behaviour they do not like
- remember that someone else might misinterpret your actions, no matter how wellintentioned
- be aware that any physical contact with a child or young person may be misinterpreted
- recognise that special caution is required when you are discussing sensitive issues with children or young people
- operate within Independence Project principles, guidance and Safeguarding Children and Young People Policy and Procedures
- operate within Independence Project e-Safety Policy, always using ICT, the internet, mobile phones and other electronic communication devices appropriately
- challenge unacceptable behaviour and report all allegations/suspicions of abuse

You should also:

give guidance and support to less experienced staff and volunteers.

Incidents that must be reported/recorded:

If any of the following occur you should report this immediately to another colleague and record the incident. You should also ensure the parents/carers of the child are informed:

- If you accidentally hurt a child or young person
- If he/she seems distressed in any manner
- If a child or young person appears to be sexually aroused by your actions
- If a child or young person misunderstands or misinterprets something you have done

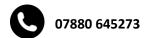
You must not:

- have inappropriate physical, verbal, phone, text or online contact with children or young people
- allow yourself to be drawn into inappropriate attention-seeking behaviour
- make suggestive, inappropriate or derogatory remarks or gestures in front of children or young people, or their parents/carers
- jump to conclusions about others without checking facts
- show favouritism to any individual
- either exaggerate or trivialise child abuse issues⁽¹⁾
- rely on your good name or that of Independence Project to protect you



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- believe "it could never happen to me"
- take a chance when common sense, policy or practice suggests another more prudent approach.

(1) Effective Support for Children and Families in Essex (ESCB, July 2017) provides clear guidance on appropriate responses to concerns over the welfare of Children/Young People

Whistleblowing

It is good practice and you have a duty of care to draw attention to bad/poor practice in the workplace. This includes practice which may be abusive and/or neglectful, including online. Staff or volunteers who work with children have individual responsibility to raise concerns with someone who has the responsibility to take action.

Sometimes it may be necessary to go outside the immediate work environment, or the immediate organisation. Essex Safeguarding Children Board supports those who raise concerns about practices which may be abusive to children. It is the responsibility of all organisations, including Independence Project, to promote a culture which values good practice and encourages whistleblowing.

A whistleblower is a person who reveals information with the intention of calling attention to bad practice, which may include abuse or negligence, in the workplace. Staff who work with children have an individual responsibility to raise concerns about bad practice, and a right to know that they will be supported by their employer as they are acting in good faith.

Review of Policy and Procedures

We are committed to reviewing our policy, procedures and good practice annually, or following any significant changes in local ESCB safeguarding procedures (SET Procedures), and/or statutory guidance.

This version (reviewed in May 2019), refers to the May 2019 version of the *SET Procedures*, but a further revision of the *SET Procedures* is due to be published in October 2019, so further amendments to this policy may be required after that.

The Policy, Procedures and Appendices will be updated and checked by the Designated Lead for Safeguarding, trained to ESCB Level 3, with reference to local and national guidance. These may also be subject to scrutiny ('Section 11 Audit') if required under ESCB procedures, using their Safeguarding Audit Tools, and/or the NSPCC Standards for the Voluntary and Community Sector Self-Assessment Tool.

Acknowledgements:

Some of the wording for this policy originated from: *Example of a child protection policy - Adapted from Firstcheck, NSPCC 2006.* This was downloaded in April 2013, from the Safe Network website, which has since been closed down.



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Independence Project

Safeguarding Children and Young People Policy and Procedures

Appendix A: Additional Information for Parents

This Appendix is for parents/carers of young people using our services.

What if you suspect an injury is not accidental or that your child has been harmed or abused in some way?

If, following an arrangement made through Independence Project, your child has an injury that you think may not be accidental, or you are not happy with the explanation given, or should you suspect your child has been harmed or abused in some way:

- (i) Make a written note of why you are concerned and what your child said about the incident, and about any subsequent conversations with Independence Project staff or volunteers on the matter. If you are unhappy or not satisfied with explanations or information given to you, you should also note the reasons why.
- (ii) Contact the Independence Project Lead Worker (07880645273), at the Independence Project office.

You can also contact the Children & Families Hub directly (0345 603 7627).

If you contact Social Care via the Children & Families Hub, they will decide whether to carry out an investigation under their Safeguarding/Child Protection Procedures. The form of this investigation will depend upon the seriousness and nature of the injury or concern. It is likely that it will include the appointment of a key worker by Social Care, who will have overall responsibility for co-ordinating the investigation.

If you contact Independence Project, the Lead Worker, in consultation with the Designated Lead - Safeguarding, will contact Children's Social Care, who will then decide what further action is required.

What to do if you have a complaint or concern of any other kind relating to services or support provided by Independence Project to young people, or any suggestions as to how Independence Project might improve its services.

Independence Project welcomes feedback and comments from our clients and their parents/carers, and we aim to ensure that any concerns or difficulties raised are resolved effectively.

Informal feedback and suggestions are welcome at all times - please speak or write to your usual contact at Independence Project, or use one of the project evaluation forms.

If you have any concerns or comments about our services, which Independence Project needs to address more formally, you should contact the Lead Worker, or the Designated Lead - Safeguarding (07880645273) to discuss your concerns.



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If there are concerns or difficulties which cannot be resolved quickly to the satisfaction of all those involved, the Comments, Compliments & Complaints Policy should then be followed. Copies of this policy are available from the office.



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Independence Project Safeguarding Children and Young People Policy and Procedures

Appendix B: Independence Project response to allegations or concern against a staff member or volunteer

If Independence Project has concerns or receives a complaint or allegation that a worker/volunteer has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against, or related to a child, or
- behaved towards a child or children in a way that indicates s/he may be unsuitable to work with children

The Designated Lead - Safeguarding or another appropriate member of staff must **immediately** telephone the Essex Local Authority Designated Officer (LADO) on 03330 139 797. The Essex LADO will advise Independence Project on what action to take next. [In Southend or Thurrock, we will contact their Local Authority Designated Officer: Southend: (01702) 534539, Thurrock: (01375) 652535/652921]

If a concern is raised outside office hours, and a referral to Social Care is required, the Designated Lead - Safeguarding, or another appropriate member of staff, will contact Essex/Southend Social Care 0345 606 1212 (or Thurrock 01375-372468), and inform either the Children's Safeguarding Service or the Local Authority Designated Officer at the first available opportunity during working hours.

Should the child's parent(s)/carer(s) contact Social Care directly, they will make a decision as to whether or not to carry out an investigation under their Child Protection Procedures.

If it then proves necessary to suspend the staff member or volunteer from any further contact with clients or volunteers under the age of 18yrs, whilst any further action is taken, the managing director will implement this decision. Independence Project will offer support during this time, without prejudice to the investigation, to the volunteer or staff member.

After the investigation, the Designated Lead - Safeguarding will meet with the staff member or volunteer concerned to clarify the outcome of the investigation and any recommendations made. A support person may attend with the staff member or volunteer concerned.

A report will then be prepared by the lead worker, in consultation with the Designated Lead - Safeguarding. Part of that report will be a decision as to the staff member or volunteer's future with the organisation.

Should the person concerned be a member of permanent staff, that report will constitute a recommendation in accordance with our discipline policy and procedures. They will then make the final decision in such a case. If the staff member or volunteer is unhappy with the decision reached by the organisation they may appeal using Independence Project complaints and Grievance Procedures.



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Independence Project

Safeguarding Children and Young People Policy and Procedures

Appendix C: Sources of Further Information/Contact Details

Essex Safeguarding Children Board - website: www.escb.org.uk Telephone: 0333 013

8936 - Email: escb@essex.gov.uk

The ESCB website has a wide range of information relating to Safeguarding Children and Child Protection, and types of abuse/significant harm, particularly:

SET Child Protection Procedures should be downloaded from: www.escb.co.uk*

*Independence Project staff are advised to download and save a copy of the pdf file of the current version of the SET Procedures onto their computer's desktop screen, for reference at any time. Please be aware that an updated version is due in October 2019

Essex County Council Protection of Children and Vulnerable Adults -

Making a referral/enquiry by telephone: 0345 603 7627

Where there are concerns about the *immediate* safety of a child/young person (in working hours): 0345 603 7627 and ask for the Priority Line

Out of hours: 5.30pm – 8.45am Monday - Thursday, 4.30pm Friday – 8.45am Monday (inc. Bank Holidays) Tel: 0345 606 1212, (and/or Essex Police: 999 or 112)

[All contact details, referral forms etc. are on the ESCB website: www.escb.org.uk]

Practitioners, managers and safeguarding leads can also access information and guidance about the thresholds of need and most appropriate level of intervention via the *Essex Effective Support Portal*: https://www.essexeffectivesupport.org.uk/

This portal includes an online Request for Support Form, and a Directory of agencies and services across Essex who offer targeted support to children and their families. These services can be accessed directly by families and involved professionals.

SET PREVENT Policy and Guidance:

http://www.escb.co.uk/media/2008/set-prevent-policy-guidance-v7.pdf

Working Together to Safeguard Children, HM Government, July 2018

A guide to inter-agency working to safeguard and promote the welfare of children. Please contact the Designated Manager if you wish to see Independence Project's office copy. This can also be downloaded from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment data/file/779401/Working Together to Safeguard-Children.pdf

Independence Project Policies and Guidelines:

<u>Comment, Compliments and Complaints Policy / Confidentiality Policy / Disciplinary</u> Procedure / E Safety Policy / Employment of Ex-offenders Policy / Equality and Diversity Policy



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/ Grievance Procedure / Prevent Duty Statement / Privacy Policy / Safeguarding Adults Policy / Social Media Policy / Whistleblowing Policy / Professional Boundaries and Relationships Policy / Code of Conduct

This policy and those which are underlined above can be downloaded from: https://www.independenceproject.co.uk/policies

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