

BANKS HOUSE AND SCHOOL SAFEGUARDING POLICY INCORPORATING CHILD PROTECTION

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(...not label)



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Last Updated: September 2023 - Next Review Due: September 2024

Policy Consultation & Review

This policy is available on our school and home website and is available on request from the school/home's office. We also inform parents and carers about this policy when their children join our home and the school..

The policy is provided to all staff prior to interview, alongside our Staff Code of Conduct, Positive Management of Behaviour policy and the safeguarding response to those pupils who are missing from education. In addition, all staff are provided with Part One of the statutory guidance ['Keeping Children Safe in Education'](#), DfE (2023).

This policy will be reviewed in full by the School Advisory Board on an annual basis. This policy was last reviewed and agreed by the School Advisory Board September 2023. It is due for review September 2024.

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Important roles and named people

Throughout this policy, the following roles may be mentioned. It is important to know who these people are;

Role	Name	Contact details
Registered Manager	Helen Baker	01603 441497
Deputy Manager	Sarah Barrett	01603 441497
Designated Safeguarding Lead (DSL)	Dawn Wale/Helen Baker	01603 441497
Responsible Individual	Peter Stillings	01603 441497
Deputy DSL	Sarah Barrett	01603 441497
Head of School	Dawn Wale	01603 441497
Named Safeguarding School Advisory Board member	Rachel Quick	01603 629440
School Advisory Board Chair	Rachel Quick	01603 629440
Compliance Director	Sonnie Rozenbroek	01482 620988

Note: Where it says 'school' we refer to school and college

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OUR HOME/SCHOOL'S CONTEXT

At Banks House School we provide care and education for children and young people with Learning Disabilities and Autism. This is significant in terms of this document as we recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

We work to address these additional challenges alongside external professionals including, but not limited to social workers and Starfish+ (specialist learning disability service), along with ensuring any appropriate support for communication is in place.

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1. PURPOSE & AIMS

1.1 The purpose of Banks House Homes and School's safeguarding policy is to ensure every child/young person at Banks House and Banks House School, is safe and protected from harm. This means we will always work to:

- Protect children and young people at our home/school from maltreatment;
- Prevent impairment of our children's and young people's mental and physical health or development;
- Ensure that children and young people at our home/school grow up in circumstances consistent with the provision of safe and effective care;
- Undertake that role so as to enable children and young people at our home/school to have the best outcomes.
- To ensure a consistent good practice across the company
- To demonstrate the company's commitment with regards to safeguarding children.

1.2 This policy will give clear direction to all staff including, agency staff, volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at Banks House and Banks House school.

1.3 Our home/school fully recognises the contribution it can make to protect children from harm and supporting and promoting the welfare of all children who reside at Banks House or attend our school. The elements of our policy are prevention, protection and support.

1.4 We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for children who are absent from school or who go missing from education, particularly on repeat occasions. The Attendance Lead will regularly liaise with the Designated Safeguarding Leads (DSLs) to discuss all persistently absent pupils and those who go missing to identify the risk of abuse and neglect including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm.

1.5 This policy applies to all pupils, staff, parents, board members, volunteers and visitors.

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2. OUR ETHOS

2.1 The child's welfare is of paramount importance. Our home/school will establish and maintain an ethos where pupils feel secure, are encouraged to communicate, are listened to and are safe. Children at our home/school will be supported to communicate to any member of staff at our home/school, during their weekly Young Person meeting, if they are worried or concerned about something or someone. All staff will reassure children that their concerns are being taken seriously and that they will be supported and kept safe. Children will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

2.2 Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that staff at our home/school play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. **All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.** When concerned about the welfare of a child, staff members must always act in the **best interests** of the child and always **act without delay**.

2.3 At Banks House Home/School we ensure that safeguarding and child protection is at the forefront and underpin all relevant aspects of process and policy development. We operate with the best interests of the child at heart.

2.4 Where there is a safeguarding concern, the child and their advocate's wishes and feelings are taken into account when determining what action to take and what services to provide. The systems we have in place support children to report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. Where the child's capacity is restricted, the child's advocate will be reassured that they can safely express their views and give feedback.

2.5 All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets. Every child and their advocates will know what the adult will have to do with any information they have chosen to disclose. All staff will be trained to recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware of the behavioural changes that may be displayed by the children as a way of communicating distress. These behaviours will be detailed in the children's Star Support Plans and PBS plans.

2.6 Throughout our broad and balanced curriculum and our 24/7 learning, we will provide activities and opportunities for children to develop the knowledge, values and skills they need to identify risks, including knowing when and how to ask for help for themselves and others to stay safe (this includes online). The Relationships Education, Relationships and Sex Education and Health Education will cover relevant topics in an age and stage appropriate way, enabling pupils to learn about their rights and responsibilities to behave and stay safe in a variety of contexts on and offline. This will provide further reinforcement to help children identify risks, know when to seek support and develop the skills to ask for help from trustworthy, reliable sources (where possible). We achieve this by:

- inviting external providers into the school to provide workshops teaching and encouraging our pupils to stay safe. These include: Local police, fire service and healthcare professionals. Our young people receive E-safety lessons throughout the year.
- Our outdoor area meets the specific needs of our pupils as detailed in their EHCPs e.g. trampoline and agility ladder to release excessive energy. Our outdoor area also enhances creative play and learning e.g. raised garden beds, swing, sensory area.
- Our pupils regularly engage with the community, going to the library, park, swim lessons, horse riding lessons, gym and other provisions. The provision when outside of the learning centre is in accordance with the needs of the child as detailed in their EHCP and/or placement plans

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Further information can be found in the DfE guidance '[Teaching online safety in school.](#)' and '[Relationships Education, Relationships and Sex Education and Health Education.](#)' This education is underpinned by the school's Positive Management of Behaviour policy and pastoral support system.

2.7 At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers, social workers and colleagues from other agencies in line with [Working Together to Safeguard Children](#) (2018) and the [Norfolk Multi Agency Safeguarding Partnership arrangements.](#)

2.8 As part of our responsibilities for safeguarding and promoting the welfare of children, we will provide a coordinated offer of early help when additional needs of children are identified. This would be via the child's social worker.

2.9 At Banks House Home/School we understand the importance of working in a way that adheres to the following legislation:

- The Human Rights Act 1998
- Equality Act 2010
- Public Sector Equality Duty

This means we do not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics)

3. ROLES AND RESPONSIBILITIES

Role	Name	Contact details
Registered Manager	Helen Baker	01603 441497
Deputy Manager	Sarah Barrett	01603 441497
Designated Safeguarding Lead (DSL)	Dawn Wale/Helen Baker	01603 441497
Responsible Individual	Peter Stillings	01603 441497
Deputy DSL	Sarah Barrett	01603 441497
Head of School	Dawn Wale	01603 441497
Named Safeguarding School Advisory Board member	Rachel Quick	01603 629440
School Advisory Board Chair	Rachel Quick	01603 629440
Compliance Director	Sonnie Rozenbroek	01482 620988

3.1 It is the responsibility of *every* member of staff (agency staff) volunteer and regular visitor to our home/school to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all children. This includes the responsibility to provide a safe environment in which children can live and learn.

The School Advisory Board

3.2 The School Advisory Board of Banks House School is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our School Advisory Board takes collective responsibility to safeguard and promote the welfare of our pupils, we also have a named member who champions safeguarding within the school.

3.3 The School Advisory Board will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our school website and has been written in line with Local Authority guidance and the requirements of the Norfolk Safeguarding Children Partnership policies and procedures;
- The school contributes to inter-agency working in line with Working Together to Safeguard Children (2018);
- A senior member of staff from the leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL who is an appropriately trained member to deal with any issues in the absence of the DSLs. There will always be cover for this role. The role will be evidenced explicitly in the role holder's job description.

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- All staff receive a safeguarding induction and are provided with a copy of this policy, the staff code of conduct, the Positive Management of Behaviour policy and the school's safeguarding response for those pupils who go missing from education.
- All staff undertake appropriate child protection training that is updated annually and on-line safety training;
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance;
- Safer recruitment practices are followed in accordance with the requirements of ['Keeping Children Safe in Education'](#) DfE (2023);
- They remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.

3.4 The School Advisory Board will receive a safeguarding report at each meeting that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the school. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual pupils.

The Registered Manager/Head of School

3.5 At Banks House Home/School the Registered Manager is the DSL outside of school hours, the Head of School is the DSL during school opening times for the children who are registered at Banks House School. The DSLs are responsible for:

- Identifying a senior member of staff from the leadership team to be the Designated Safeguarding Lead (DSL);
- Identifying alternate members of staff to act as the Designated Safeguarding Lead (DSL) in his/her absence to ensure there is always cover for the role;
- Ensuring that the policies and procedures adopted by the schools advisory board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff;
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures;
- Liaise with the LADO in the event of an allegation of abuse being made against a member of staff or volunteer.

The Designated Safeguarding Lead (DSL)

3.6 The Designated Safeguarding Leads are members of staff, including from the leadership team who take lead responsibility for safeguarding and child protection within our home/school. The DSLs will carry out their role in accordance with the responsibilities outlined in Annex C of ['Keeping Children Safe in Education'](#) (2023) and [the Children's Homes Quality Standards \(2015\)](#)

3.7 The DSLs will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare must be reported **without delay** to the relevant DSL in writing or verbally as appropriate.

3.8 The Designated Safeguarding Lead and or a deputy will always be available for staff in the school/home to discuss any safeguarding concerns. If a DSL is not available on the home/school site in person (e.g. during the night), we will ensure that they are available via telephone.

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3.9 The DSLs at Banks House Home/School will represent our home/school at child protection conferences and core group meetings. Through appropriate training, knowledge and experience our DSLs will liaise with Children's Services and other agencies where necessary, and make referrals of suspected abuse to Children's Services, take part in strategy discussions and other interagency meetings and contribute to the assessment of children.

3.10 The DSLs will maintain records and child protection files ensuring that they are kept confidential and stored securely (see section 8 for more information.)

3.11 The DSLs are responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction and have been trained within the home/school to the agreed home/school's safeguarding training.

3.12 The DSLs will obtain details of the Local Authority Personal Advisor appointed to guide and support a child who is a care leaver.

3.13 The DSLs will take the lead responsibility for promoting outcomes for children by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement.

3.14 This will include understanding their progress and attainment and maintaining a culture of high aspirations for this cohort and supporting all staff to provide additional support or bespoke interventions to help children reach their potential.

3.15 We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm. The DSLs will use the information that they hold about children to make decisions in the best interests of the child's safety, welfare and help promote outcomes.

4. TRAINING & INDUCTION

4.1 When new staff join our home/school they will be informed of the safeguarding arrangements in place. They will be given a copy of our safeguarding policy along with the staff code of conduct, Part one and Annex F of *'Keeping Children Safe in Education'* and told who our DSLs and Deputy DSL are. They will also receive a copy of the Positive Management of Behaviour Policy and the school's response to children who go missing from education – this information is included in section 7 of this policy. All staff are expected to read these key documents. They will also be provided with information about how to record and report safeguarding concerns. If they are newly appointed members of staff this will form part of their induction process.

4.2 Every new member of staff or volunteer will receive safeguarding training during their induction period within two weeks of joining the school. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child (including reassuring victims that they are being taken seriously and that they will be supported and kept safe), how to record, the processes for referral to Children's Services and the statutory assessments under Section 17 and Section 47 as well as the remit of the role of the DSL. The training will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children. Staff will also receive on-line safety training as this is part of the overarching safeguarding approach of our school.

4.3 In addition to safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of *'Keeping Children Safe in Education'*. In order to achieve this, we will ensure that:

- all members of staff will undertake appropriate safeguarding training on an annual basis and revisited within supervisions and meetings
- all staff members receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively;
- The DSLs offer an open door policy to discuss concerns.
- The use of paper safeguarding forms or concerns reports is monitored weekly by the DSLs, where no concerns have been logged or large numbers of concerns are logged, this is followed up to ensure all staff are highly competent at recognising and logging concerns appropriately.

4.4 All visitors, temporary staff and volunteers to our home/school are advised of our safeguarding procedures; they will be informed of who our DSL and alternate staff members are and what the recording and reporting system is. All visitors and volunteers will need to sign into our signing in system. Here they will find information regarding who the DSLs are and how to contact them during their visit. On leaving the site, as they sign out, they will be asked if they have any concerns which need to be reported.

4.5 The DSLs, the alternate designated member(s) of staff and any other senior member of staff who may be in a position of making referrals or attending child protection conferences or core groups will attend one of the multi-agency training courses organised by Norfolk Safeguarding Children's Partnership at least once every three years. The DSL and alternate will attend Designated Safeguarding Lead (DSL) training provided by the Local Authority every two years. In addition to formal training, DSLs will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role (through safeguarding focused conversations, DSL meetings, e-courier updates, emails/updates from external bodies).

4.6 Our Schools Advisory Board will also undertake appropriate training to equip them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. This training is updated

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regularly. Training for Board members to support them in their safeguarding role is available from Norfolk Governor Services.

4.7 We actively encourage our staff to keep up to date with the most recent local and national safeguarding advice and guidance, Annex B of *'Keeping Children Safe in Education'* (2023) provides links to guidance on specific safeguarding issues such as Child Exploitation and Female Genital Mutilation. In addition, local guidance can be accessed via Norfolk Safeguarding Children Partnership and within the [Safeguarding Section](#) of the [Norfolk Schools and Learning Providers website](#).

5. PROCEDURES FOR MANAGING CONCERNS

5.1 Banks House Home/School adheres to child protection procedures that have been agreed locally through the Norfolk Safeguarding Children Partnership. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with [Norfolk Local Assessment Protocol](#) and the [Norfolk Threshold Guidance](#).

5.2 Every member of staff including volunteers working with our children must maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy.

5.3 All staff must report any concerns that they have and not see these as insignificant. A referral may be a single incident such as an injury or disclosure of abuse or may accumulate over a period of time and is evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy immediately to allow the DSLs to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and current records of concern could lead to a failure to protect. Please see Appendix 3 - Reporting Safeguarding Concerns Flowchart for clear guidance of the process

5.4 It is not the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy. Please see Appendix 4 for staff guidance on how to respond to a safeguarding concern

5.5 The DSLs should be used as a first point of contact for concerns and queries regarding any safeguarding concern. Any member of staff or visitor who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSLs or, if unavailable, to the alternate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

5.6 During school hours, all concerns about a child or young person should be reported without delay and recorded in the daily progress notes using the 'concern' blue tab. This does not include concerns about a member of staff, which should be reported in the usual way (to the DSLs or most senior member of staff). Records should include:

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

5.7 During home hours, all concerns about a child or young person must be reported to the Registered Manager, Deputy Manager or Team Leader.

5.8 Following receipt of any information raising concern, the DSLs will consider what action to take and inform social workers. All information and actions taken, including the reasons for any decisions made, will be fully documented.

5.9 All referrals will be made in line with Norfolk Children's Services procedures.

5.10 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Responsible Individual.

6. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS

Allegations that may meet the harms threshold

6.1 Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at our school. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

6.2 Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. We work to the thresholds for harm as set out in *'Working Together to Safeguard Children'* (2018) and *'Keeping Children Safe in Education'*, DfE (2023) below. An allegation may relate to a person who works / volunteers with children who has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The 4th bullet point above recognises circumstances where a member of staff (including agency staff) or volunteer is involved in an incident outside of the home/school which did not involve children but could have an impact on their suitability to work with children; this is known as transferable risk.

6.3 At Banks House Home/School we recognise our responsibility to report/refer allegations or behaviours of concern and/or harm to children by adults in positions of trust who are not employed by Banks House to the LADO service directly at lado@norfolk.gov.uk. These are adults such as those in the voluntary sector, taxi drivers, escorts, and foster carers and any other adult the children may come into contact with within in a position of trust.

6.4 We will take all possible steps to safeguard our children and to ensure that the adults in our home/school are safe to work with children. When concerns arise, we will always ensure that the procedures outlined in the local protocol [Allegations Against Persons who Work with Children](#) and Part 4 of *'Keeping Children Safe in Education'*, DfE (2023) are adhered to and will seek appropriate advice. The first point of contact for schools regarding concerns and/or allegation issues (including for agency staff) is via the Local Authority Education Duty Desk on 01603 307797/submit a LADO referral, as appropriate. DSLs will advise which route. If the Local Authority Education Duty Desk is contacted a Duty Advisor (not a LADO) will give advice and guidance on next steps. If the advice is to make a referral to the LADO service then the [LADO referral form](#) should be completed. The completed LADO referral form is then sent via email to: LADO@norfolk.gov.uk within one working day.

6.5 If an allegation is made or information is received about *any* adult who works/volunteer in our setting which indicates that they may be unsuitable to work/volunteer with children, the member of staff receiving the information should inform the Registered Manager/Head of School immediately. This includes concerns relating to agency staff and volunteers. Should an allegation be made against the Registered Manager/Head of School, this will be reported to the [Responsible Individual](#). In the event that neither the Registered Manager/Head of School nor Responsible Individual is not contactable on that day, the information must be passed to and dealt with by the [Compliance Director](#).

6.6 No member of staff or the schools advisory board will undertake further investigations before receiving advice from the LADO.

6.7 When using agency, we inform the agency of our process for managing allegations against staff and keep them up to date with any policy developments. Where concerns are raised about an individual and the home/school is not their employer, we recognise that we still have responsibility to ensure allegations are dealt with properly. In order to achieve this, we will liaise with relevant parties including the LADO to determine a suitable outcome. Whilst the agency should be fully involved and co-operate with any enquiries from the LADO, police and/or children's services, we recognise that the home/school will usually take the lead in conducting an investigation as we have direct access to any affected children and other staff to collect the facts.

6.8 Any member of staff or volunteer who does not feel confident to raise their concerns with the Registered Manager/Head of School or Responsible Individual should contact the LADO directly via email to lado@norfolk.gov.uk

6.9 Further [information and guidance documents in relation to the LADO process](#), forms, [leaflets](#) and the Allegations against Persons who Work/Volunteer with Children Procedures are found on the Norfolk Safeguarding Children Partnership website. Further national guidance can be found at: [Advice on whistleblowing](#). The [NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or via email: help@nspcc.org.uk.

6.10 The Home/School has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our home/school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The school must also consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency) if a teacher is dismissed or the setting ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first.

Concerns that do not meet the harm threshold

6.11 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the thresholds as stated above. For schools, In Norfolk the 'low level' concern process is to consult with the Local Authority Education Duty Desk on 01603 307797. At Banks House School we recognise a low-level concern to be something which is

- inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

For the home, a referral to LADO will be made for any concern of harm or concern that an adult has behaved in a way that may indicate they are unsuitable to work with children. It is the duty of the DSLs to decide which path needs to be taken.

6.12 At Banks House Home/School we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the home/school (including agency staff, volunteers and contractors) are dealt with promptly and appropriately. Through training, staff are made aware of what low level concerns are and understand the importance of reporting these types of concerns.

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16.13 At Banks House Home/School staff report all low level concerns to the Registered Manager/Head of School who are the DSLs. The Registered Manager/Head of School will always be the ultimate decision makers in respect of all low-level concerns.

16.14 Through training and induction, we ensure that all staff understand the importance of self-referring, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

6.15 At Banks House Home/School we understand the importance of recording low-level concerns and the actions taken in light of these being reported. The records are kept confidential and stored securely. We will review the records we hold to identify potential patterns and take action. This could be through a disciplinary process but also by referring to the Local Authority Education Duty Desk on 01603 307797. Please note, where a child, parent/carer or staff member makes an allegation of harm, this will not be considered as a 'low level' concern without consultation with the Local Authority Education Duty Desk or the LADO service directly.

6.16 We recognise that low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

7. SPECIFIC SAFEGUARDING ISSUES

Contextual safeguarding

7.1 At Banks House Home/School we recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the school environment and/or can occur between children outside of the school. This is known as contextual safeguarding. It is key that all staff understand the definition of contextual safeguarding and consider whether children are at risk of abuse or exploitation in situations outside their families. Through training we will ensure that staff and volunteers are aware that extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. When reporting concerns, staff should include as much information and background detail as possible so the DSLs can make a referral with a holistic view of the child. This will allow any assessment to consider all the available evidence and the full context of any abuse.

7.2 We recognise that children with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE): County Lines and serious violence

7.3 At Banks House home/school we train staff to recognise that both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator. Child sexual exploitation does not always include physical contact, it can also occur through the use of technology. We understand that some children may not realise they

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are being exploited e.g. they may believe they are in a genuine romantic relationship. 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. 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. We recognise that due to the Learning Disabilities and communication barriers that our young people have, they are at risk of CSE and CCE both within and outside the home. Safer recruitment procedures help protect the young people however all adults must be professionally curious and have a culture of **“it could happen here.”**

7.4 At Banks House Home/School we understand that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Due to the nature of our young people who reside and learn at Banks House, they are unlikely to have unsupervised time outside of the home and therefore this risk is greatly reduced however all adults must be professionally curious and have a culture of **“it could happen here.”**

7.5 We understand that children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. We will treat these children as victims understanding that they have been criminally exploited even if the activity appears to be something they have agreed or consented to. We recognise the experience of girls who are criminally exploited can be very different to that of boys and that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. Due to the nature of our young people who reside and learn at Banks House, they are unlikely to have unsupervised time outside of the home and therefore this risk is greatly reduced however all adults must be professionally curious and have a culture of **“it could happen here.”**

7.6 At Banks House Home/School staff are aware of the indicators and risk factors which may signal a child is vulnerable to or involved with serious violent crime. We make reference to the Home Office’s [Preventing youth violence and gang involvement](#) and [Criminal exploitation of children and vulnerable adults: county lines](#) guidance for more information.

7.7 If a child is suspected to be at risk of or involved in county lines, a referral to the Child’s Social Worker will be made.

So-called ‘honour’-based abuse (including Female Genital Mutilation and Forced Marriage)

7.8 At Banks House Home/School we recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called ‘honour-based’ abuse (HBA) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBA, they should inform the DSLs who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care.

7.9 Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. [Section 5B of the Female Genital Mutilation Act 2003](#) (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl

under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: [Mandatory Reporting of Female Genital Mutilation- procedural information](#) Home Office (January 2020)

7.10 At Banks House Home/School we recognise that forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. The Forced Marriage Unit has [statutory guidance](#) and [Multi-agency guidelines](#) and can be contacted for advice or more information: Contact 020 7008 0151 or email fmufco.gov.uk

Preventing radicalisation and extremism

7.11 We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. At Banks House Home/School, we will ensure that:

- Through training, staff, volunteers and Board members have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- The DSLs have received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism.
- The DSLs will make referrals in accordance with [Norfolk Channel Procedures](#) and will represent our school at Channel meetings as required.
- Through our curriculum and our informal 24/7 learning, we will promote the spiritual, moral, social and cultural development of pupils and British Values.

Child on child sexual violence and sexual harassment

7.12 At Banks House Home/School all staff are trained so that they are aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- upskirting;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

7.13 We recognise that children (especially children with Learning Disabilities) are vulnerable to physical, sexual and emotional abuse by other children or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important that all staff and volunteers remember the impact on both the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. We understand that abuse can occur in intimate personal relationships between children; and that consensual and non-consensual sharing of nudes and semi nude images and or videos¹ (also known as sexting or youth produced sexual imagery) is a form of child on child abuse.

7.14 We understand that even if there are no reports in our setting it does not mean it is not happening, it may be the case that it is just not being reported. We recognise that children may not find it easy or have the capacity, due to their learning disabilities, to tell staff about their abuse and can show signs or act in ways that they hope adults will

¹ UKCIS guidance: [Sharing nudes and semi-nudes advice for education settings](#)

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notice and react to. Usually, the victim will not make a direct report, and this may come from a family member or member of staff working with the child. Staff will be responsive to changes in behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating to child on child abuse and they will always challenge this. It must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Doing this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

7.15 At Banks House Home/School we regularly review decisions and actions and relevant policies are updated to reflect any lessons learnt. We look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we decide upon an appropriate course of action.

7.16 At Banks House Home/School all staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report. We will also offer appropriate support to the perpetrator and any other children involved.

7.17 All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about child on child abuse. The DSLs will respond to any concerns related to child on child abuse in line with guidance outlined in [Part five of 'Keeping Children Safe in Education' Child-on-child sexual violence and sexual harassment \(2022\)](#). We will ensure that all concerns, discussions and decisions reached are clearly recorded and any identified actions are followed up.

7.18 We will work with other agencies including the police and Children's Social Care, as required to respond to concerns about sexual violence and harassment. We will seek consultations where there are concerns or worries about developmentally inappropriate or harmful sexual behaviour from the Harmful Sexual Behaviour (HSB) Team as required so that we ensure we are offering the right support to the child(ren). At Banks House we have a named Police Liaison Officer who we can call on or consult with if the need arises.

7.19 Support will depend on the circumstances of each case and the needs of the child, it may include completion of risk assessments to support children to remain in home/school whilst safeguarding other children and the victim, delivery of early intervention in respect of HSB and/or referral to [The Harbour Centre Sexual Assault Referral Centre \(SARC\)](#) where a child discloses a rape, an attempted rape or a serious sexual assault whether this has happened recently or in the past. The assault does not have to have taken place in Norfolk but the victim must live in Norfolk to access support. The SARC also has a 24/7 helpline 01603 276381 if a child(ren), their advocate or staff need to speak to a Crisis Worker for help & advice. Referral forms can be found on [The Harbour Centre website](#).

Modern Slavery

7.20 At Banks House Home/School we understand that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance [Modern slavery: how to identify and support victims](#) for concerns of this nature.

Safeguarding responses to children who go missing

7.21 At Banks House Home/School all staff should be aware of the safeguarding responsibilities for children who are missing education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

7.22 At Banks House School we adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who are missing:

- An attendance register is taken at the start of the first session of each school day and once during the second session;
- The school and the home work closely together to ensure that the children receive a full entitlement to their education
- Staff will alert DSLs to any concerns raised regarding children who are absent from school
- A DSL will meet regularly with the Attendance Lead and SENCo to ensure that each response is thorough and takes into account all the relevant information about individual children
- We will follow the procedures outlined in our attendance policy to ensure we intervene early in cases of poor attendance and/or unexplained absences.
- When removing a child from roll at the standard and non-standard transition points, we will inform the Local Authority in accordance with statutory requirements and pass on all safeguarding files.

Whilst it is unlikely that our children will become missing in education due to the fact that they reside in our care and are 1:1/ 2:1 in the community, there are times when they visit family outside of school times. In the event that our pupils do not return to school, the homes Missing Child policy will be followed, this includes informing the Local Authority, home visits and if necessary completing the CME form and sending it to the [CME team at Norfolk County Council](#).

7.23 At Banks House Home, if a young person goes missing, procedures will be followed according to their individual risk assessment, support plans, Missing Child policy and Herbert protocol document. This will include, as appropriate;

- Informing parents
- Informing social workers
- Physically looking for the young person
- Informing the police

Mental Health

7.24 At Banks House Home/School all staff are made aware, through training, that 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. Our staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

7.25 We understand that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Therefore, through training, staff are aware of how children's experiences can impact on their mental health, behaviour and education. All staff are aware that if they have a mental health concern about a child that is *also* a safeguarding concern, they should take immediate action by passing the information on to a Designated Safeguarding Lead.

7.26 At Banks House Home/School there are clear systems and processes in place for identifying possible mental health problems and working with other agencies as required to respond to these concerns include recognising and reporting concerns on daily progress notes and informing relevant external professionals such as social workers or

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community LD/MH teams (Starfish+). Designated Safeguarding Leads make reference to the [‘Mental Health and Behaviour in Schools’](#) see DfE guidance for further support.

Online Safety

7.27 At Banks House Home/School all staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. We understand that in many cases abuse will take place concurrently via online channels and in daily life. We know that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

7.28 As part of the requirement for staff to undergo regular updated safeguarding training, online safety training is also delivered. We will ensure online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement. More details can be found in our Online safety policy.

7.29 At Banks House Home/School we recognise that technology, and risks and harms related to the internet evolve and change rapidly. Therefore, we carry out an annual review of our approach to online safety, supported by a risk assessment (on at least an annual basis) that considers and reflects the risks that children face in our setting. We also communicate with parents and carers to reinforce the importance of children being safe online.

Filtering and monitoring

7.30 During the staff induction period, staff receive online safety training including filtering and monitoring. Filtering and monitoring is regulated by BT Business Content Filtering Service. This ensures that staff and pupils cannot access unsuitable content. If they do this will be logged as a concern and investigated promptly. The Head of school is the DSL. Any monitoring and filtering concerns are reported via our concerns tab. Once a month, our (Matt what is your job title?) reports that there has been no issues to the DSL. If a concern has been raised, this will be emailed to the Head of School and the schools Responsible Individual. This will be reviewed promptly and discussed in the regular DSL meetings.

Cybercrime

7.31 We understand that cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer).

7.31 If there are concerns about a child in this area, the designated safeguarding leads will consider a referral to the [Cyber Choices programme](#) which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Domestic Abuse

7.32 Children referred to Banks House/school may have experienced (directly or indirectly) domestic abuse in previous family or care settings. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. At Banks House Home/School all staff are aware that domestic abuse can encompass a wide range of behaviours and may be a

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single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. We understand that children can be victims of domestic abuse, and this can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Any concerns regarding the effects of domestic abuse is discussed and appropriate support offered in consultation with children's services and external professionals (Starfish+).

Children who are LGBTQIA+

7.33 LGBTQIA+ is an inclusive term that includes people of all genders and sexualities, such as lesbian, gay, bisexual, transgender, questioning, queer, intersex, asexual, pansexual, and allies. While each letter in LGBTQIA+ stands for a specific group of people, the term encompasses the entire spectrum of gender fluidity and sexual identities.

7.34 The fact that a child or a young person may be LGBTQIA+ is not in itself an inherent risk factor for harm. However, in line with 'Keeping Children Safe in Education', we recognise that children who are LGBTQIA+ or those perceived by other children to be LGBTQIA+ could potentially be more vulnerable and therefore we work to reduce any additional barriers faced. We provide a safe space for these children to speak out or share their concerns with members of staff. Our curriculum explores the effects of bullying and abuse.

8. RECORDS AND INFORMATION SHARING

8.1 If staff are concerned about the welfare or safety of any child at our home/school, they will inform the DSLs in the first instance who will advise them on the next steps to be taken. This may be by recording their concern on the agreed 'concerns blue tab' which is on the progress notes - within school hours only or in some circumstances a verbal report or a log on progress notes. Any concerns should be passed to the DSLs without delay.

8.2 Any information recorded will be kept in a separate named file, in a secure cabinet and not with the child's academic file. These files will be the responsibility of the DSLs. Child protection information will only be shared on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential.

8.3 Child protection information will be kept up to date. Each concern logged will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored on the child's file.

8.4 When a child leaves our home/school, (including in year transfers) the DSLs will make contact with the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school. This will be within 5 days for an in-year transfer or within the first 5 days of the start of a new term. We recognise that not providing information as per the timescales can impact on the child's safety, welfare and educational outcomes.

8.5 We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery.

8.6 Prior to a child leaving we will consider if it would be appropriate to share any additional information with the new school, college or home in advance to help them put in place the right support to safeguard this child.

8.7 Where a parent elects to remove their child from the school roll to home educate, the school will discuss this with the child's social worker. We will also be contacting the Local Authority as this goes against the contract set up between the parents, LA and the home.

9. WORKING WITH PARENTS & CARERS

9.1 Banks House Home/School is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

9.2 When new children join our home/school, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the school website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries.

9.3 We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to safeguard a child from harm.

9.4 We will seek to share with parents any concerns we may have about their child unless doing so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSLs making a referral to social workers, LADO or the Duty Desk in those circumstances where it is appropriate to do so.

9.5 In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults who is significant to the child;
- Full names and contact details of all persons with parental responsibility (if different from above);
- Emergency contact details (if different from above);
- Full details of any other adult authorised by the parent to collect the child (if different from the above).

The home/school will retain this information on the pupil file. The school will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the school has been supplied with the adult's full details.

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10. CHILD PROTECTION CONFERENCES

10.1 Children's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a Child Protection Plan in order to monitor the safety of the child and the required reduction in risk.

10.2 Staff members may be asked to attend a child protection conference or core group meetings on behalf of the home/school in respect of individual children. Usually the person representing the home/school at these meetings will be the Registered Manager/Head of School or a DSL. In any event, the person attending will need to have as much relevant up to date information about the child as possible; any member of staff may be required to contribute to this process.

10.3 All reports for child protection conferences will be prepared in advance. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation. In order to complete such reports, all relevant information will be sought from staff working with the child.

10.4 Clearly child protection conferences can be upsetting for parents. We will work in an open and honest way with any parent. Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with our parents.

11. SAFER RECRUITMENT

11.1 We will ensure that the appointing manager and at least one member of the panel will have completed appropriate safer recruitment training. At all times the panel will ensure that safer recruitment practices are followed in accordance with the requirements of 'Keeping Children Safe in Education', DfE (2023) [Working Together to Safeguard Children](#) DfE (July 2018).

11.2 At Banks House Home/School we will use the recruitment and selection process to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities.

11.3 We require details of a candidate's present (or last) employment and reason for leaving; full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment and evidence of original academic certificates. We do not accept testimonials. For school appointments only, prior to the interview, references will be sought (where possible). We will question the contents of application forms if we are unclear about them, and shortlisted educational candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

11.4 At Banks House Home/School we use a range of selection techniques to identify the most suitable person for the post. Structured questions are agreed by the interview panel and any potential areas of concern are explored to determine the applicant's suitability to work with children.

11.5 We will undertake Disclosure and Barring Service checks and other pre-employment checks as outlined in 'Keeping Children Safe in Education' to ensure we are recruiting and selecting the most suitable people to work with our children.

11.6 We will maintain a Single Central Record (SCR) of all safer recruitment checks carried out in line with statutory requirements. A senior member of staff will check the SCR regularly to ensure that it meets statutory requirements.

11.7 At Banks House Home/School we recognise that safer recruitment is not just about carrying out the right DBS checks and is not limited to recruitment procedures. Therefore, we understand the importance of completing the Safer Recruitment Checklist, continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. Further information about all of these processes can be found in our Recruitment and Selection policy.

12. SAFER WORKING PRACTICE

12.1 All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

12.2 All staff will be provided with a copy of our code of conduct at induction. They will be expected to know our Code of Conduct and policy for Positive Management of Behaviour and carry out their duties in accordance with this advice. A list of staff that have accessed Team Teach training will be kept by the Registered Manager and Head of School.

12.3 Physical contact - Staff must provide a level of care, including physical contact, which is designed to demonstrate warmth, respect, and positive regard for children. Physical contact should be given in a manner that is safe and protective and promotes appropriate positive relationships between children and adults. A child's preferences for physical contact will be documented in their Star support plan.

12.4 Planned 1:1 time between care staff and children will be documented on the daily handover. Where 1:1 work is delivered as part of a specialist service or direct work programme this should be identified in the Placement Plan provided by the local authority. Managers will, where it is deemed necessary, ensure a risk assessment is carried out for the delivery of any piece of work that is consistent with the Placement Plan. Staff should always try to keep doors open unless this constitutes a breach of privacy for the child. In these instances it may be necessary to undertake a risk assessment of the situation. No volunteer working in the home should ever be in a 1:1 situation with a child. If an accident happens whilst in this situation as with any other situation make sure an accident report form is filled in, which staff will be trained in how to complete during their induction. All staff receive Lone Working training during their induction, which is refreshed every two years.

12.5 Giving personal care (where deemed necessary on the Placement Plan), should be recorded on the daily progress notes. Children must be supported and encouraged to undertake bathing, showers and other intimate care for themselves without relying on staff, however some young people at Banks House may not be able to complete such tasks without prompting and will therefore require personal care from staff. This will be documented in the young person's 'Star Support Plan' and should be recorded in 'Progress Notes' by staff assisting. If a child needs help with intimate care, arrangements must emphasise the child's dignity.

12.6 Young women should be supported and encouraged to keep their own supply of sanitary protection without having to request it from staff, however a supply will be kept within the home. Some residents at Banks House may not be capable of managing this and this will be clearly documented in the young person's Star support plan. There should also be adequate provision for the private disposal of used sanitary protection within the home.

12.7 If it is known or suspected that a child is likely to experience enuresis (involuntary urination) and/or, encopresis (soiling) or may be prone to smearing, it should be discussed openly, with the child if possible, and strategies adopted for managing it. These strategies should be outlined in the child's Placement Plan, care plan, Star support plan and risk assessment. It may be appropriate to consult a Continence Nurse or other specialist, who will provide advice on the most appropriate strategy to adopt. In the absence of such advice, the following should be adopted:

- Talk to the child in private, openly but sympathetically if the child has the capacity to engage in this conversation. If the child does not have capacity refer to the Star support plan for guidance on communication.
- Do not treat it as the fault of the child, or apply any form of sanction;
- Do not require the child to clear up; arrange for the child to be supported and if necessary assist the young person to wash then wash any soiled bedding and clothes, according to the infection control guidance .
- Keep a record in the daily progress notes;
- Consider using mattresses or bedding that can withstand being soiled or wet.

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13 RELEVANT POLICIES

13.1 To underpin the values and ethos of our home/school and our intent to ensure that children are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Staff Code of Conduct
- Anti-Bullying
- Recruitment & Selection which adheres to Part 3 of [Keeping Children Safe in Education](#)'.
- Whistleblowing
- Attendance
- Online Safety
- Health and Safety including site security
- Harassment and discrimination including racial abuse
- Meeting the needs of pupils with medical conditions
- Intimate Care
- First aid
- Educational visits including overnight stays
- RSHE
- Missing Child Policy

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14. STATUTORY FRAMEWORK

This policy has been devised in accordance with the following legislation and guidance:

- [Working Together to Safeguard Children](#) DfE (July 2018)
- [Keeping Children Safe in Education](#) DfE (2023)
- [Working Together to Improve School Attendance. DfE \(2022\)](#)
- [Norfolk Safeguarding Children Partnership procedures](#)
- [Norfolk Safeguarding Children Partnership Protocol: Allegations Against Persons Who Work with Children](#)
- [Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings](#) (Feb 2022)
- [What to do if you're worried a child is being abused](#) DfE (March 2015)
- [Information sharing: advice for practitioners providing safeguarding services](#) DfE (July 2018)
- [The Prevent duty: Departmental advice for schools and childcare providers](#) DfE (June 2015)
- [Mandatory Reporting of Female Genital Mutilation- procedural information](#) Home Office (December 2015)
- [Sexual violence and sexual harassment between children in schools and colleges](#) DfE (July 2021)
- [Child sexual exploitation: guide for practitioners](#) DfE (February 2017)
- [Teaching online safety in school](#) DfE (June 2019)
- [Mental Health and Behaviour in Schools](#) DfE (November 2018)
- [Data protection: toolkit for schools](#) DfE (September 2018)
- [Promoting the education of children with a social worker](#) (June 2021)
- [Preventing youth violence and gang involvement](#)
- [Criminal exploitation of children and vulnerable adults: county lines](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)

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Appendices 1 - Types of abuse

Neglect

Neglect is a form of Significant Harm which involves 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/involve:

- During pregnancy as a result of maternal substance abuse;
- Parent/carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment;
- Failing to protect a child from physical and emotional harm or danger;
- Failure to ensure adequate supervision including the use of inappropriate carers;
- Failure to ensure access to appropriate medical care or treatment;
- May also include neglect of, or unresponsiveness to a child's basic emotional needs.

Warning signs include:

- Non-organic failure to thrive, i.e. where there is poor growth for which no medical cause is found, especially with a dramatic improvement in growth on a nutritious diet away from home;
- A consistently unkempt, dirty appearance;
- Unmet medical needs, e.g. failure to seek medical advice or attend appointments for illness, severe untreated nappy rash, missed immunisations where they have not been refused on other grounds;
- Developmental delay without any other clear cause;
- Lack of social responsiveness;
- Self-stimulating behaviours such as head banging or rocking (note that some children with special needs may exhibit this behaviour due to their disability but this should also be evaluated for context);
- Repeated failure by parents/carers to prevent injury;
- Consistently inappropriately clothed for the weather;
- Hazardous living conditions.

Physical abuse

Physical abuse is a form of Significant Harm which may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child, including fabricating the symptoms of, or deliberately causes, ill health, to a child.

Harm may be caused to children both by the abuse itself, and by the abuse taking place in a wider family or institutional context of conflict and aggression, including inappropriate or inexperienced use of physical restraint. Physical abuse has been linked to aggressive behaviour in children, emotional and behavioural problems, and educational difficulties. Violence is pervasive and the physical abuse of children frequently coexists with domestic violence and abuse. It may involve hitting, shaking, scolding, suffocating or poisoning and it may cause the following injuries:

Bruises

Symmetrically bruised eyes are rarely accidental, although they may occur where there is a fracture of the head or nose and blood seeps from the injury site to settle in the loose tissue around the eye. A single bruised eye may be

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the result of an accident or abuse. Careful consideration is required whenever there is an injury around the eye. It should be noted whether the lids are swollen and tender and if there is damage to the eye itself.

- Bruising in or around the mouth (especially in small babies);
- Grasp marks on legs and arms or chest of a small child;
- Finger marks (e.g. you may see three or four small bruises on one side of the face and one on the other);
- Symmetrical bruising (especially on the ears);
- Bruising behind the ears;
- Outline bruising (e.g. belt marks, hand prints);
- Linear bruising (particularly on the buttocks or back);
- Bruising on soft tissue with no obvious explanation, e.g. inner aspect of thigh;
- Bruising of different ages.

The following are uncommon sites for accidental bruising:

- Back of legs, buttocks, except occasionally along the bony protuberances of the spine
- Mouth, cheeks, behind the ear;
- Stomach, chest;
- Under the arm;
- Genital, rectal area;
- Neck

Babies or others who are not yet mobile, i.e. are developmentally unable to move on their own, should not get bruises or other injuries. If they have bruises or other injuries, these must be adequately explained before they are accepted as accidental.

Note

Seemingly trivial injuries should not be ignored. Abuse can and does sometimes escalate against a child if it goes unchecked. All injuries should be noted and collated in the child's records.

Most falls or accidents produce one bruise on a single surface - usually on a bony area. A child who falls downstairs generally has only one or two bruises. Children usually fall forwards and therefore, bruising is most often found on the front of the body. In addition, there may be marks on their hands if they have tried to break their fall.

Bruising may be difficult to see on a child who is black. Mongolian blue spots are natural pigmentation on the skin which may be mistaken for bruising. These purplish-blue skin markings are most commonly found on the backs of children.

Scars

Children may have scars, but notice should be taken if a child has a large number of scars of different ages (especially if coupled with current bruising), unusual shaped scars (e.g. round ones from possible cigarette burns) or of large scars that are from burns or lacerations that did not receive medical treatment.

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Fractures

These should be suspected if there is pain, swelling and discolouration over a bone or joint. Fractures should be suspected if the child is not using a limb, especially in younger children. The most common non-accidental fractures are to the long bones in the arms and legs, and to the ribs. It is very rare for a child under one year to sustain a fracture accidentally. Fractures also cause pain and it is very difficult for a parent to be unaware that a child has been hurt.

Burns/Scalds

It can be very difficult to distinguish between accidental and non-accidental burns; however, burns or scalds with clear outlines are suspicious as are burns of uniform depth over a larger area.

Bites

These can leave clear impressions of the teeth. Human bites are oval or crescent shaped. If the impression of the bites is more than 3 cm across its width, they must have been caused by an adult or older child with permanent teeth.

Other injuries which may be deliberately caused

- Poisoning;
- Ingestion or other application of damaging substances, e.g. bleach;
- Administration of drugs to children where they are not medically indicated or prescribed;
- Female Genital Mutilation (FGM) or Breast Ironing is Physical Abuse and an offence regardless of cultural or other reasons. The only exception is if surgery takes place for medical reasons.

Injuries may also be caused as a result of a parent fabricating or inducing illness in a child.

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 or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Sexual abuse can have a long-term impact on emotional, social and educational development and is linked to the development of mental health issues in later life.

Most child victims are sexually abused by someone they know - either a member of their family or someone well known to them or their family. It can be the most secretive and difficult type of abuse for children and young people to disclose.

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Both boys and girls of all ages are abused and the abuse may carry on for many years before it comes to light.

Initially children and young people may not recognise themselves as victims of sexual abuse - a child may not understand what is happening and may not even understand that it is wrong especially as the perpetrator will seek to reduce the risk of disclosure by threatening them, telling them they will not be believed or holding them responsible for their own abuse.

Recognition of sexual abuse generally follows either a direct statement from the child (or very occasionally from the abuser), or more often, as a result of concerns about the child's behaviour, or because of physical symptoms or signs.

Indicators that a child has been sexually abused include:

- Changes in behaviour, including becoming more aggressive, withdrawn, clingy;
- Problems in school, difficulty concentrating, drop off in academic performance;
- Sleep problems or regressed behaviours i.e. bed wetting;
- Frightened of or seeking to avoid spending time with a particular person;
- Knowledge of sexual behaviour/language that seems inappropriate for their age;
- Physical symptoms including pregnancy in adolescents where the identity of the father is vague or secret, STIs, discharge or unexplained bleeding;
- Poor hygiene, which often leads to social isolation in school;
- Injuries and bruises on parts of the body where other explanations are not available especially bruises, bite marks or other injuries to breasts, buttocks, lower abdomen or thighs; and
- Injuries to the mouth, which may be noted by dental practitioners.

Child sexual exploitation is also a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Emotional abuse

Emotional abuse is a form of Significant Harm which involves the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 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's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including on-line/ Cyberbullying*) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

*Cyberbullying means when the internet, mobile phones or other devices are used to hurt or bully another person, this can include text messaging, emails, instant messaging and use of social networking sites such as Facebook.

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It is not usually indicated by a specific incident, but is observed in the interaction with the child. One child may be scapegoated or treated completely differently to their siblings.

Parental behaviours associated with Emotional Abuse

The following may identify parental behaviours which, if persistent, may be emotionally abusive. What is inappropriate will often depend on the child's developmental stage:

- A persistently negative view of the child, particularly as inherently bad, often combined with "deserved" harsh punishment;
- Inconsistent and unpredictable responses particularly where there is a threat to or rejection of the child;
- Expectations which are inappropriate for the developmental stage of the child, either too high or too low, over protective or under protective;
- A lack of emotional availability or responsiveness to the child;
- No respect for personal boundaries of the child; not seeing the child as an individual;
- Promoting mis-socialisation or poor social adaptation;
- Contradictory, confusing or misleading messages in communicating with the child which seriously distort reality for the child or promote confusion;
- Serious physical or psychiatric illness of a parent including periods of hospitalisation;
- Induction of a child into bizarre parental beliefs;
- Breakdown in parental relationship with chronic, bitter conflict over contact or residence (this would also include situations where there is domestic violence);
- Major emotional rejection of the child and parental inability to perceive his/her needs with any objectivity;
- Major and repeated familial change, e.g. separations, reconstitution of families;
- Parental drug and/or alcohol misuse;
- Entrenched offending behaviour which may be criminal and which might also lead to a term of imprisonment.

Behavioural signs in children

Behaviour in a child which may indicate emotional abuse includes:

- Very low self esteem, often with an inability to accept praise or to trust;
- Lack of any sense of fun, over-serious or apathetic;
- Excessive clingy or attention seeking behaviour;
- Over-anxiety, either watchful and constantly checking or over-anxious to please;
- Developmental delay, especially in speech;
- Substantial failure to reach potential in learning, linked with lack of confidence, poor concentration and lack of pride in achievement;
- Self harming; compulsive rituals; stereotypical repetitive behaviour;
- Unusual pattern of response to others showing emotions.

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Appendix 2: Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers.

We all have a statutory duty to safeguard and promote the welfare of children, and at our school we take this responsibility seriously.

If you have any concerns about a child or young person in our school, you must share this information immediately with our Designated Safeguarding Lead (DSL) or one of the alternate post holders.

Do not think that your worry is insignificant if it is about hygiene, appearance or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the designated professionals detailed below and provide them with a written record of your concern. A copy of the form to complete is attached to this and others can be obtained from the office/Dawn Wale. Please ensure you complete all sections as described.

If you are unable to locate them, ask a member of the school office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.

Any allegation or low-level concern about a member of staff, a child's carer or a volunteer should be reported immediately to the Head of School. If an allegation is made about the Head of School you should pass this information to the Chair of the Schools Advisory Board. Alternatively, you can contact the Local Authority Duty Desk on 01603 307797. [NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or via email: help@nspcc.org.uk.

The people you should talk to in school are:
Designated Safeguarding Lead (DSL): Dawn Wale
Location of office: Banks House School
Contact Number: 01603 441497

Deputy Designated Lead: Helen Baker
Location of office: Banks House
Contact Number: 01603 441497

Chair of Schools Advisory Board: Rachel Quick
Contact Number: 01603 629440

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Appendix 3: Reporting Safeguarding Concerns Flowchart

BANKS HOUSE & SCHOOL

REPORTING SAFEGUARDING CONCERNS FLOWCHART - STAFF GUIDANCE

1

Report to Helen Baker
(RM) or Dawn Wale
(Head of school)

If Helen Baker or Dawn Wale are implicated in the allegation then report to Peter Stillings (Operations director)
OR
The Local Authority (0344 800 8020)
OR
Social Worker (Tel number in young persons file)
OR
Police (999)

2

In an emergency
(immediate risk to child) take necessary action

This may include asking for police assistance or emergency medical assistance. If the child is taken to hospital or the Police are called, staff must inform them that there is a suspicion of abuse or harm

3

Once notified, the DSLs will be responsible for following the Multi-Agency Safeguarding Children Procedures

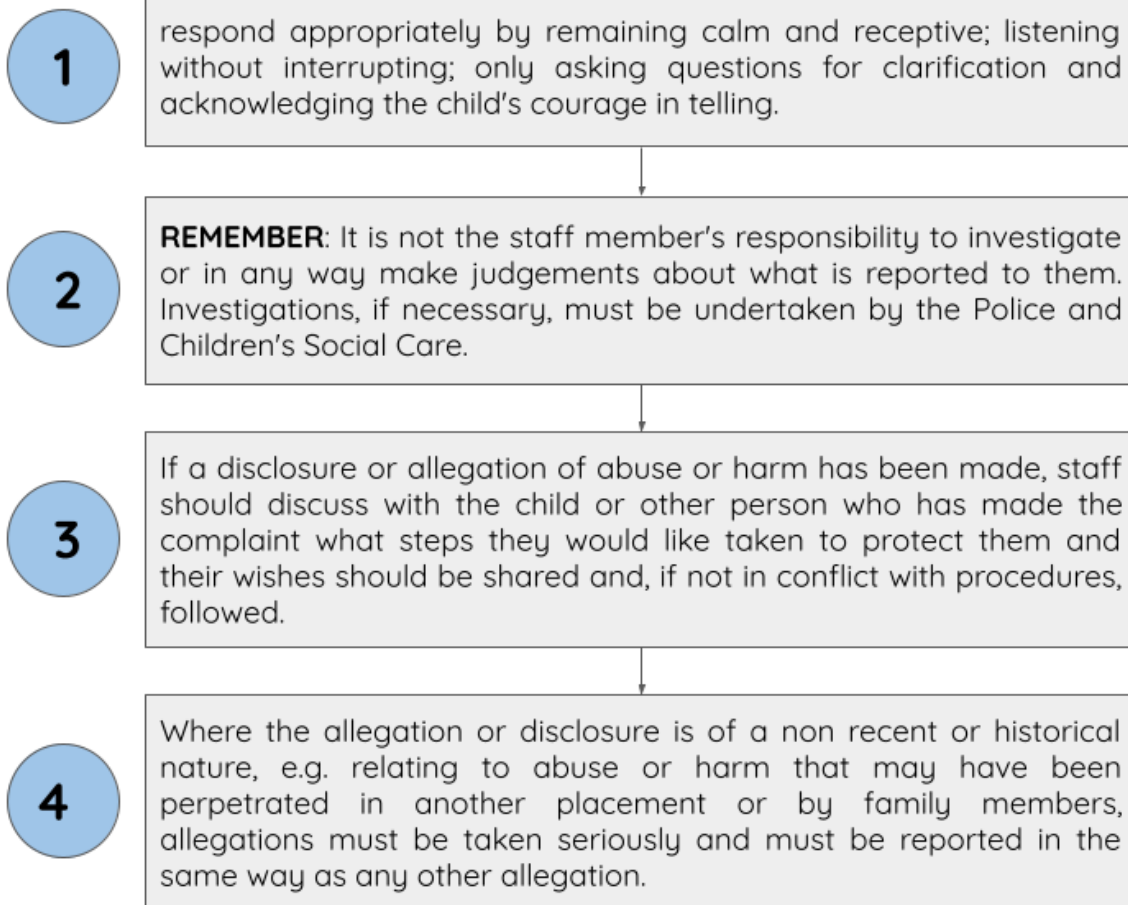
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Appendix 4: Receiving Concerns from a Child in Relation to Abuse and Harm Flowchart

BANKS HOUSE

RECEIVING CONCERNS FROM A CHILD IN RELATION TO ABUSE AND HARM FLOWCHART - STAFF GUIDANCE

"Children will sometimes disclose abuse to an adult who they have come to feel they can trust. If a child discloses abuse it is important that staff....."



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BANKS HOUSE

RECEIVING CONCERNS IN RELATION TO ABUSE AND HARM FLOWCHART - STAFF GUIDANCE

5

Staff must not give absolute guarantees of confidentiality to those who report possible abuse or harm, but they should guarantee that they will take steps to ensure that appropriate action is taken and the child or young person protected.

6

If an allegation or any suspicion is about the behaviour, past or present of another member of staff, including managers, which may in any way put children at risk, staff must follow the Allegations Against Staff and Volunteers Procedure (See flowchart)

7

Staff must make a **written record** as soon as possible of what they have been told, any questions they asked and the replies given and the actions taken and by whom. They must then give the report to the Registered manager of Banks house or head of school.

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Appendix 5: Reporting Safeguarding Concerns Flowchart

BANKS HOUSE

Appendix 5

ALLEGATIONS AGAINST STAFF - RESPONDING TO CONCERNS OR ALLEGATIONS FLOWCHART

The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind. They should:

1

The staff member makes a written record of the information in the child / adult's own words, including the time, date and place of incident/s, persons present and what was said. Sign and date the written record

2

Staff must immediately report the matter to the Registered manager (Helen Baker) or Dawn Wale (Head of school), or the deputy in their absence or; where the Registered manager is the subject of the allegation report to the deputy (Sarah Barrett) or other appropriate senior manager (Sarah Durrell or Peter Stillings)

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Appendix 6 - Confidential reporting (Whistleblowing)

9.1 - Purpose of this procedure

Confidential Reporting is also referred to as 'Whistleblowing'.

Staff have the right and the responsibility to raise genuinely held concerns about abuses of power and trust by colleagues towards:

1. Children using our services;
2. Any other children;
3. Adult Service Users (i.e. Social Workers);
4. Other employees/managers

Any concerns that a colleague might have or has been mistreating or abusing a child must always be reported without delay.

No one exercising their responsibilities under this procedure and in good faith will be penalised for doing so. Any attempt to victimise employees for raising genuine concerns or to prevent such concerns being raised will be regarded as a disciplinary matter.

Any attempt to abuse this procedure by maliciously raising unfounded allegations will also be regarded as a disciplinary matter.

9.2 - Using the confidential reporting/whistleblowing procedure

NOTE: Any concerns relating to possible mistreatment or abuse of a child must be reported via the Referring Safeguarding Concerns Procedure (please appendix 3). This also includes the reporting of practice not in line with the policies of Banks House/school or general concerns about the quality of care or education procedures ongoing within Banks House/school.

9.2.1 How do I raise concerns?

You should raise them with your DSLs, Registered Manager Helen Baker or Head of school Dawn Wale. In their absence the deputy DSL should be informed or the [Responsible individual](#). Alternatively, the [Compliance Director](#) can be informed.

9.2.2 What if I feel unable to speak to either my Manager or his/her Manager?

You should talk to another manager or you could contact Public Concern at Work (<https://protect-advice.org.uk/>)

9.2.3 What happens when I raise my concerns?

This will depend largely on the nature of the concerns you raise. However, in all cases, the DSLs, or other person, with whom you raise your concerns will arrange to meet you as soon as possible and away from the workplace, if necessary, to enable you to fully explain what your concerns are and why you have them. We will ask you how you wish to see the concern resolved and whether you would want to be told about how we will conduct the investigation. The DSLs will tell you either at that meeting or as soon as possible afterwards, what action will be taken in response to the issues you have raised. You will be told the outcome of any investigation into your concerns.

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Sometimes, however, it may not be possible to reveal the full extent of the investigation where this relates to personal issues involving a third party. Where action is not taken, you will be given an explanation.

9.2.4 Can I bring someone to support me when I meet the DSLs to discuss my concerns?

Yes, but because the issues raised under this procedure will often be of a sensitive nature, you should discuss the matter with as few people as possible.

9.2.5 How long will it take for my concerns to be addressed?

This will depend on the nature of the issues you raise. Wherever possible, the matter will be addressed within 28 days of you raising it.

9.2.6 What can I do if I am unhappy with the actions taken in response to the concerns I have raised?

If you do not agree with the way your concerns have been dealt with by Management, you may in the first instance notify the Responsible individual (Peter Stillings) (Confidential Reporting). Alternatively, you may seek advice from Public Concern At Work ([Protect](#)), a charity which provides free independent legal advice to staff and others who wish to raise concerns about the workplace.

9.3 - Managing the procedure

9.3.1 What do I do as a Manager if concerns are raised with me?

- A. You must arrange to meet the person raising the concerns as quickly as possible to establish exactly what the concern is and understand what has given rise to it;
- B. You need to consider carefully where the meeting should take place and allow the person raising the concerns to be accompanied by an appropriate friend or colleague, if that is their wish;
- C. You must make a note of your conversations with the person raising the concerns and agree the accuracy of that note with them;
- D. You must be sensitive to the fact that the person concerned may feel uncomfortable about raising issues with you regarding a colleague or a manager;
- E. You must consider and address the support needs of the person who is the subject of the concerns and of the person raising them;
- F. If a person disclosing a concern wishes their identity to be confidential, you ought to provide reassurance that their wishes will be respected. You should explain that you will not disclose their identity without their consent unless a Court Order requires this. You should also explain that it may not always be possible to take all the necessary action if their identity is to remain confidential;
- G. You must prioritise the process of dealing with the issue remembering that, wherever possible, it should be addressed within 28 days of the matter being raised with you.

9.3.2 What do I do once I have established what the concerns are?

If the issue appears to be of a relatively minor and straightforward nature, you may decide to resolve it informally and directly with the individual who is the cause of the concerns.

If the issue appears to be complex or more serious, you must first consider whether any immediate action is necessary to protect the needs of the child, (This may include referring the matter to the Police and/or initiating a referral to Children's Social Care. If the concern relates to the welfare of a child and you do not feel able to respond, you should seek advice on how to proceed.

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You must then decide how the issue is to be investigated and must arrange for that investigation to take place as quickly as possible.

You must inform the person raising the concerns of the action that you have taken and of the outcome of any investigation.

9.4 - Recording

A record of concerns raised under this procedure together with a record of action taken in response will be retained on the personal files of the complainant and the person complained about for as long as those files are retained. The record on the file of the person complained about will exclude the identity of the complainant in cases where anonymity has been maintained.

9.5 - Confidentiality

This Procedure has been designed to ensure that employees can feel confident that they can raise concerns about malpractice and that those concerns will be properly and effectively dealt with within Banks House.

It is preferable that a serious concern is raised responsibly rather than not at all. If you are uncertain about who to approach with your concerns, you should seek advice from your Trade Union or Public Concern At Work.