



## Child Protection and Safeguarding Policy & Procedures

<b>Policy last updated</b>	September 2024
<b>by</b>	Katie Meanwell, Designated Safeguarding Lead
<b>Due for Renewal</b>	September 2025

### 1. Statement of Intent

- 1.1 At Jamie's Farm we are committed to safeguarding and promoting the welfare of all children and adults at risk in our care. The Jamie's Farm Child Protection and Safeguarding Policy & Procedures (the "**Policy**") sets out how the organisation discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children and adults. The Policy aims to ensure the protection of all children and adults at risk in all aspects of our work and to offer comprehensive advice to all staff members and volunteers with regards to legal requirements and good practice.
- 1.2 Fundamental to this is the recognition that the welfare of the child or adult at risk is paramount, and that all children or adults at risk, without exception, have the right to protection from abuse regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. In order to achieve this, Jamie's Farm endeavours to create a culture of listening to and engaging in dialogue with children and adults at risk – seeking their views in ways appropriate to their age and understanding and taking account of those both in individual decisions and the establishment or development and improvement of services. This Policy aims to ensure that all children and adults at risk visiting Jamie's Farm will have a positive and enjoyable experience and fulfil their potential.
- 1.3 For the purposes of child protection and safeguarding, the term 'child', 'children', 'young person' or 'young people' within this Policy refers to anyone up to the age of 18 years undertaking the Jamie's Farm programme.
- 1.4 For the purposes of this Policy, the term 'adult' or 'adults' refers to at risk individuals and vulnerable service users over the age of 18. Jamie's Farm treats concerns about adults at risk as it does a child safeguarding matter.
- 1.5 This Policy is shared with schools, organisations, children, parents, carers and other stakeholders upon request.
- 1.6 At Jamie's Farm we work with children from a number of schools, virtual schools and other organisations from around the country. We therefore recognise the importance of working across agencies, ensuring that that all safeguarding issues are referred to the relevant agency (e.g. the child's school/youth organisation, local authority or local safeguarding partnership) as well as working under the authority of our own local safeguarding partnerships in Wiltshire, Herefordshire, Monmouthshire, East Sussex and North Yorkshire.

- 1.7 The Designated Safeguarding Lead ("**DSL**") for the organisation is Katie Meanwell. She leads a Safeguarding Team, which has a DSL and Deputy DSL at each of the farms. This Safeguarding Team meets regularly and communicates frequently. The DSL is copied into all referrals and each member of the Safeguarding Team has access to a confidential area on Sharepoint that securely stores all relevant documentation. The Safeguarding Team coordinates child protection and safeguarding policies and procedures effectively and are the first point of contact for any staff or volunteer who wishes to discuss an issue concerning child protection and safeguarding.
- 1.8 The Policy will be reviewed at least annually by the DSLs, endorsed by the trustees – in particular the Safeguarding Trustee (Rebecca Boomer-Clark) – and updates distributed among all Jamie's Farm staff, trustees, volunteers and apprentices.

### The Safeguarding Team:

Name	Contact details
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## 2. Legal/Statutory obligations

- 2.1 Jamie's Farm is subject to and/or recognises legal responsibilities in terms of child or adult at risk care and child or adult at risk protection and safeguarding. The practices and procedures within this Policy are based on UK legislation and government guidance (set out below) with the aim of discharging Jamie's Farm's statutory responsibilities. The following legislation/guidance is taken into consideration:
- Duty of care – common law. This is an overall responsibility to endeavour to ensure the safety and welfare of the young people, personnel and trustees.
  - *The Human Rights Act (1998)*. This includes the right of individuals not to receive ill treatment; to privacy and family life; and not to be the recipients of discrimination.

- *The Children Act (1989 and 2004 version)*. This lays down the foundations for trying to ensure that the welfare of the child is paramount. Amongst other things, the 1989 Act states that it is the responsibility of all Local Authorities to promote and safeguard the welfare of children within their areas. This includes assessments of children who may be in need and the duty to investigate if it is believed that a child may be suffering or is likely to suffer significant harm. The 2004 Act builds upon the 1989 Act, establishing a duty on the local authority to promote co-operation with partners and other agencies in order to improve the wellbeing of children in their area. It also placed duties on a range of organisations and individuals to ensure they too give sufficient regard to children in need of help and safeguarding.
  - *The Data Protection Act (2018) and the UK General Data Protection Regulation (2021)* govern data protection and privacy for all individuals within the United Kingdom, including children. Please see the privacy notice on the Jamie's Farm's website (the "**Privacy Notice**") or contact the UK GDPR administrator at Jamie's Farm for further information.
  - *The Sexual Offences Act (2003)*.
  - *The Children Act (2004)*. This sets out the organisational responsibilities for child protection and safeguarding.
  - *The Mental Capacity Act (2005)*
  - *The Safeguarding Vulnerable Groups Act (2006)*. This includes the responsibility to ensure that all personnel who have contact with children and young people using services of Jamie's Farm have had the appropriate statutory checks made and are supervised properly whilst carrying out their tasks.
  - *The Education Act (2012)*.
  - *Care Act 2014*. Governs arrangements for adult protection for those over 18.
  - *The Children and Families Act (2014)*.
  - *The Children and Social Work Act (2017)*.
- 2.2 In particular, Section 11 of the Children Act 2004, section 175 of the Education Act 2002 and section 55 of the Borders, Citizenship and Immigration Act 2009 place duties on organisations and individuals to ensure that their functions are discharged with regard to the need to safeguard and promote the welfare of children.
- 2.3 Safeguarding and promoting the welfare of children is defined for the purpose of statutory guidance (*Working Together to Safeguard Children 2024*) under the Local Authority Social Services Act 1970, Children Act 2004, Education Act 2002, Education (Independent School Standards) Regulations 2014, and the Non-Maintained Special Schools (England) Regulations 2015 as:
- providing help and support to meet the needs of children as soon as problems emerge;
  - protecting children from maltreatment, whether that is within or outside the home, including online;
  - preventing impairment of children's mental and physical health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
  - taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

### 3. Government guidance and local procedures

- 3.1 There is government guidance which is, in effect, mandatory (Local Authority Social Services Act, 1970, Section 7). There are also local policies and procedures which are compulsory:
- The Children Act (1989) - Regulations and Guidance.
  - Safe from Harm – a code of practice for safeguarding the welfare of children in voluntary organisations in England and Wales (1993). This outlines thirteen recommendations for voluntary agencies working with children.
  - Framework for the assessment of children in need and their families (2000). This defines the framework for the assessment of all children who are thought to be in need, including the need to be safeguarded.
  - Every Child Matters (2003). The government’s aims and objectives in childcare/child protection and safeguarding.
  - The enquiry into the death of Victoria Climbié (2003). This enquiry set out a number of recommendations which have influenced legislation, policy and procedures in child protection and safeguarding.
  - Department for Education: Children Act 1989: private fostering (2005).
  - *Safeguarding Vulnerable Groups Act* (2006).
  - The Children’s Plan (2007), which was developed having regard to the principles and articles of the UN Convention on the Rights of the Child, further set out the role of Government and a wide range of agencies and professionals in improving children’s lives.
  - Lord Laming’s progress report, *The Protection of Children in England: A Progress Report* (March 2009). 58 recommendations relating to: leadership and accountability, support for children, interagency working, children’s workforce, improvement and challenge, organisation and finance and the legal framework.
  - Department for Education: *Children Act 1989: Care Planning, Placement and Case Review* (published 2010, last updated 2021)
  - Wiltshire Safeguarding Vulnerable People Partnership Procedures
  - West Midlands Safeguarding Children Procedures
  - Sussex Child Protection and Safeguarding Procedures
  - Gwent Safeguarding Protocols and Procedures
  - North Yorkshire Safeguarding Children Partnership Procedures
  - Department of Education: *Supervision of activity with children* (2012).
  - Department for Education: *Prevent Duty Guidance* (first published 2015, last updated 2024).
  - Residential Holiday Schemes for Disabled Children – National Minimum Standards (2013).
  - Department for Education: *Care of Unaccompanied Migrant Children and Child Victims of Modern Slavery* (2017).
  - Department for Education: *Child Sexual Exploitation: Definition and Guide for Practitioners* (2017).
  - HM Government: *Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers* (2018)
  - Department for Education: Special Educational Needs and Disability ("**SEND**") Code of Practice: 0-25 years (first published 2014, last updated 2020).
  - Department for Education: *The Prevent duty: Safeguarding Learners Vulnerable to Radicalisation* (published 2022, last updated 2023).
  - HM Government: *Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children* (2023). This outlines the child protection and safeguarding process in terms of organisations, replacing the 2018 version of the guidance.
  - Department for Education: *Keeping children safe in education: Statutory guidance for schools and colleges* (2024).

- Department for Education: *Children's Social Care National Framework* (2023).

#### 4. The Role of Jamie's Farm Staff

- 4.1 Safeguarding and promoting the welfare of children is the responsibility of everyone at Jamie's Farm. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all staff and trustees involved with Jamie's Farm (whether paid or in a voluntary capacity) should recognise that they have a duty of care towards children, young people and adults at risk - they should consider, at all times, what is in the best interest of the child, young person or adult at risk.
- 4.2 All Jamie's Farm staff have a responsibility for creating a safe space for children, young people and adults at risk whilst they are visiting. As a residential setting, it is particularly important that staff are alert to the additional vulnerabilities of SEND children, inappropriate relationships between children and the potential for child-on-child abuse.
- 4.3 All staff should be prepared to identify children who may benefit from early help – this means providing support as soon as a problem emerges at any point in a child's life. Any staff member or volunteer who has any concern about a child's welfare should follow the processes set out in this policy.
- 4.4 The overall responsibility for the Safeguarding of young people whilst they are at Jamie's Farm is with the visiting school or organisation staff accompanying them on their visit.
- 4.5 All Jamie's Farm staff and volunteers are responsible for understanding and following this Policy and the staff [Code of Conduct](#).

#### 5. Safe recruitment, selection and vetting

- 5.1 It is vital that Jamie's Farm creates a culture of safe recruitment and adopts recruitment procedures that help deter, reject or identify people who might pose a safeguarding risk to children or adults at risk. Jamie's Farm acts reasonably in making decisions about the suitability of the prospective trustees, staff and volunteers based on checks and evidence including: criminal record checks (Disclosure and Barring Service ("DBS") checks) and prohibition checks together with references and interview information.
- 5.2 All applicants will be required to submit a detailed application when applying for any position. This form will ask for relevant information about the applicant's background such as dates and places of employment, education and other relevant experience from the age of 16.
- 5.3 The recruitment process for delivery roles (those working directly with young people) will involve working alongside and/or being interviewed by young people.
- 5.4 Where possible, interviews should be conducted by more than one staff member, and should involve a range of assessment methods in order to assess and evaluate a candidate's suitability to the role.
- 5.5 Every applicant must be directed to a copy of this Policy.
- 5.6 An offer of appointment to a successful candidate, including one who has lived or worked abroad, must be conditional upon satisfactory completion of pre-employment checks. This will include references (at least two) which can be taken verbally in the first instance but to be followed by a written reference and held securely in their personnel file. It may also include online searches.
- 5.7 When appointing new staff, Jamie's Farm must:
  - verify a candidate's identity, preferably from current photographic ID and proof of address except where, for exceptional reasons, none is available;

- obtain a certificate for an enhanced DBS check with barred list information where the person will be engaging in work that a barred person must not do, such as teaching, training, instructing, caring or supervising children on a regular basis, as defined in the Safeguarding Vulnerable Groups Act 2006 (a "**Regulated Activity**");
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role, as long as it is done in a manner consistent with our Equal Opportunities Policy and is in no way discriminatory;
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then Jamie's Farm should follow advice on the GOV.UK website;
- make any further checks we consider appropriate, if the person has lived or worked outside the UK;
- verify professional qualifications, as appropriate.

5.8 A DBS certificate must be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, Jamie's Farm may undertake an online update check through the DBS Update Service. If an update check is being undertaken through the DBS update service, the applicant must also present their original DBS certificate.

5.9 There is no requirement to obtain a new enhanced DBS check if, in the three months prior to beginning work in their new appointment, the applicant has worked:

- in a school in England in a post which brought them into regular contact with children.
- in a college in England in a position which involved the provision of education and regularly caring for, training, supervising or being in sole charge of children under the age of 18.
- in another organisation in a position which involved regularly caring for, training, supervising or being in sole charge of children or young people under the age of 18, which required an Enhanced DBS check with child's barring list.

If this is the case, confirmation must be obtained from the previous employer that they are not aware of any changes to the applicant's DBS certificate status since the start of their employment. The applicant must also present their original DBS certificate.

5.10 In accordance with Jamie's Farm's Privacy Notice, information revealed will be considered only for the purpose for which it was obtained and will be destroyed after a suitable period has passed - usually not more than six months following a recruitment decision. All information will be handled and stored securely, by authorised members of staff only.

5.11 In accordance with The Code of Practice, Jamie's Farm uses DBS certificate information in the context of a policy on the recruitment of ex-offenders, designed to protect applicants from unfair discrimination on the basis of non-relevant past convictions. See Jamie's Farm Equal Opportunities Policy.

5.12 When DBS checks are being processed, that individual may work with children and adults at risk, but may only do so with supervision from another person who has enhanced DBS clearance. All other checks should be performed, including pre-employment checks, prior to individual working with children and adults at risk.

5.13 There may be circumstances in which a Disclosure shows a cause for concern about a prospective employee, but which is not sufficient to disqualify them under the Criminal Justice and Court Services Act 2000 or the Care Standards Act 2000.

5.14 In these circumstances Jamie's Farm and trustees should use reasonable caution, based on:

- the nature and seriousness of the problem disclosed, and its relevance to the duties and responsibilities of a charity employee;
  - how long ago the problem disclosed took place; and
  - whether there is a pattern of offending behaviour and the extent to which the prospective employee has been reformed and rehabilitated in the intervening period.
- 5.15 It is important to remember that a Disclosure is intended to enable organisations to reach better informed decisions. It is not intended to lead to employers rejecting applicants with a criminal record as a matter of course, and the same applies when appointing trustees. In such cases, however, the existing trustees will need to give careful consideration to the proposed appointment.

## **6. Vetting and Barring**

- 6.1 All Jamie's Farm staff, apprentices and volunteers who are involved in Regulated Activity are subject to an enhanced DBS check with barring list. All trustees, staff and volunteers who are not involved in Regulated Activity are subject to an enhanced DBS check. These checks will be repeated at least every 3 years, therefore all staff should subscribe to the online DBS update service. All trustees, staff, volunteers and apprentices are required to read this Policy and our Code of Conduct and sign a personal disclosure form (see appendices).
- 6.2 Jamie's Farm will ensure that anyone working or volunteering for them in Regulated Activity is compliant with DBS checks with barring list.
- 6.3 Jamie's Farm complies with its legal duty to refer to the DBS any information about individuals who may pose a risk of harm to vulnerable groups, in particular if it removes someone from Regulated Activity or controlled activity for allegedly causing harm or posing a risk of harm. Any case will be referred to the DBS if we think that the individual has committed an offence that would lead them to be automatically included on a barred list under the automatic barring provisions.
- 6.4 Whenever possible, all DBS checks should be completed upon the offering of a position and before employment or a volunteer placement commences. However, in some circumstances where this is not possible due to time constraints, employment or a volunteer placement may commence before the DBS certificate has been issued, in which case the employee/volunteer will not have unsupervised access to children and young people. The contract of employment is to be provisional, pending the enhanced disclosure. A decision about any member of staff or volunteer commencing work at Jamie's Farm before the DBS certificate has been issued should be made in consultation with the DSL.
- 6.5 Jamie's Farm will keep abreast of all advice and legislation regarding the DBS and other safeguarding issues as it is published by government review.

## **7. Training and Induction**

- 7.1 All staff members, volunteers and apprentices are monitored and supervised and will learn about child protection and safeguarding (including adults at risk) in accordance with their roles and responsibilities to ensure they are confident and competent to carry out these responsibilities.
- 7.2 As part of the induction process, all staff, volunteers and apprentices will receive Child protection and safeguarding training proportionate to their role (including familiarisation with their child protection and safeguarding responsibilities and the policies and procedures to be followed if they have concerns about a child or adult at risk's safety or welfare), will be given a copy of this Policy and code of conduct. This training will allow all staff, volunteers and apprentices to recognise their responsibilities with regard to their own good practice and

the reporting of suspected poor practice/ possible concerns of abuse. They will receive a suitable refresher course at least every 3 years, but usually annually.

- 7.3 Safeguarding updates, announcements and reminders are made regularly to staff via the weekly staff bulletin and safeguarding is a regular agenda point in weekly delivery team meetings and in the monthly cross-organisation meeting.
- 7.4 Attendance will be kept on record for all training that staff, volunteers and apprentices have received.
- 7.5 Jamie's Farm staff will be trained accordingly:

**Level 1** - Staff in contact with children and young people and with adults who are parents or carers. These will be people who are in a position to identify concerns about maltreatment, including those which may arise from use of the Early Help Assessment (EHA), and who, as a minimum, need introductory training on how to work together to safeguard and promote the welfare of children. This training will be given in house when appropriate, by a staff member who is suitably trained.

**Level 3**- Staff with a particular responsibility for safeguarding children. Those in this group need to have a thorough understanding of working together to safeguard and promote the welfare of children, including in complex and / or serious cases.

- 7.6 In advance of their placement, volunteers must read the Child Protection and Safeguarding procedures, Code of Conduct and their volunteer induction pack and are briefed orally as part of their induction process. Volunteers who are staying onsite overnight, will have regular contact with children or who are working in Regulated Activity with children must have an Enhanced DBS check with child's barring list. All volunteers will have a thorough debrief on exiting.

## 8. Creating a safe environment

- 8.1 To ensure we create a safe environment during our visits, we minimise risk by carrying out a full written or dynamic risk assessment of activities in which children are involved and ensure that the risks posed to children are minimised. For full details of all policies and procedures taken by Jamie's Farm to ensure a safe environment, please see our specific Health and Safety Policy (including risk assessment, first aid, accident and critical incident plan). As with other extracurricular school visits, schools should also have a risk assessment for all activities.
- 8.2 Whilst at the Farm, young people must be accompanied by an adult at all times (except when in bedrooms or bathrooms). This may be a member of Jamie's Farm staff, visiting staff or a volunteer.
- 8.3 Visiting organisations are required to share with Jamie's Farm details of any young person they consider to be at a specific increased risk in a farm-based residential setting, and are asked to identify any visiting young person to which the following is relevant:
  - 8.3.1 Sexualised behaviour: if a child is more likely to be highly sexualised, we **must** know about it as this presents more of a risk in a residential setting;
  - 8.3.2 False allegations against staff: if a child has a history of making false allegations against staff, we **must** know about it, as the potential for it to happen again in our intensive environment with high staff: student ratio is exacerbated;
  - 8.3.3 Absconding or flight from situations when triggered: we **must** know about this as the consequences on our site, which is impossible to fully secure, is greatly exacerbated compared to school;
  - 8.3.4 Any suicidal ideation: generally we would advise **against** such a child being chosen on the visit, but if they are selected (perhaps it was a long time ago) we should still be made aware; and



- 8.3.5 Extraordinary interest in knives or vehicles or fire: we would increase our risk mitigations in these areas if we know about any of the above.
- 8.4 The aforementioned information in paragraph 8.3 will be handled in accordance with Jamie's Farm's data protection obligations.
- 8.5 Jamie's Farm is a residential provision for small groups of children (usually 10-12 pupils), normally between the ages of 11-16 though occasionally older and younger, staying for a visit from Monday to Friday. A minimum of two members of staff from their school/ organisation accompany the visit and are responsible for overseeing night stays. On exceptional occasions children will visit without accompanying members of staff. For these, Jamie's Farm staff will supervise overnight stays and will follow the same guidelines given to visiting staff.
- 8.6 All visiting staff working overnight and Jamie's Farm staff and volunteers working evenings and with access to accommodation areas are subject to an enhanced DBS check with child's barred list.
- 8.7 Apprentices and volunteers will generally not enter accommodation areas, except under exceptional circumstances with the permission of the DSL.
- 8.8 Accommodation arrangements at Jamie's Farm will always prioritise the physical and emotional safety of visiting children, young people, and adults at risk. Decisions about bedroom arrangements will be made on a case-by-case basis in agreement with the visiting school/organisation.
- 8.9 With most groups, male and female children and young people will have same sex bedrooms. Where possible, will ensure that transgender or non-binary young people can access the sleeping accommodation in which they feel most comfortable.
- 8.10 Adults at risk will usually have bedrooms separate from children.
- 8.11 It is the responsibility of the visiting staff to lock the residential accommodation area at night using the coded safety locks and any alarm systems in place.
- 8.12 At least one Jamie's Farm member of staff will stay in separate accommodation on site and can be called for assistance overnight if required.
- 8.13 On some occasions Jamie's Farm staff will be working 1:1 with a child or adult at risk. In these situations, they will take all appropriate measures to ensure the safety of both themselves and the child or adult at risk they are with (please see sections on travel and physical constraint).

## 9. Causes for Concern

- All staff should be aware of the indicators of abuse and neglect (below) and that children can be at risk of harm inside and outside of the home as well as online.
  - Abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or label alone. Multiple issues are likely to overlap with one another.
  - All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug-taking and/or alcohol misuse, deliberately missing education, serious violence, radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.
- 9.1 All members of Jamie's Farm staff and volunteers put the welfare of the child or adult at risk at the centre of their work. A cause for concern about the safety or wellbeing of a child or adult at risk may arise in several ways: observation e.g. bruising, change in behaviour; disclosure from a young person about abuse; reporting by another young person, carer or individual that a child may have been harmed or be at risk. All categories of abuse and neglect as outlined in Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2024 must be reported.
- 9.2 **A Child in Need:** Children who are defined as being 'in need', under the Children Act 1989, are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory

level of health or development, or their health and development will be significantly impaired, without the provision of services, plus those who are disabled. The critical factors to be taken into account in deciding whether a child is in need under the Children Act 1989 are what will happen to a child's health or development without services, and the likely effect the services will have on the child's standard of health and development.

- 9.3 **Significant Harm:** Some children are in need because they are suffering or likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. The local authority is under a duty to make enquiries, or cause enquiries to be made, where it has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm (s47 of the Children Act 1989). Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect, female genital mutilation, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.
- 9.4 All concerns and allegations that a child or adult at risk is in need, has suffered or is at risk of suffering from significant harm will be taken seriously by staff, volunteers, apprentices and trustees.
- 9.5 Indicators of abuse and neglect:

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**Physical abuse:** 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 causing, ill health to a child.

What to look for:

- Any injuries, bruises, bites, burns, fractures etc. which are not consistent with the explanation given for them
- Any injuries on parts of the body unlikely to be injured accidentally, those which are not normally exposed to falls, rough games etc.
- Injuries which appear to have been caused by a weapon e.g. cuts, welts etc.
- Injuries which have not received medical attention
- Instances where children are kept away from the group inappropriately or without explanation
- Self-mutilation or self-harm e.g. cutting, scratching, drug abuse.

**Emotional abuse:** Is the persistent emotional ill-treatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children or vulnerable adults 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 a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including 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, although it may occur alone.

What to look for:

- Changes or regression in mood and behaviour particularly where a child or vulnerable adult withdraws or becomes clingy. Also depression/aggression.
- Nervousness/inappropriate fear of particular adults e.g. frozen watchfulness.
- Sudden changes in behaviour e.g. under achievement or lack of concentration.
- Inappropriate relationships with peers and/or adults e.g. excessive dependence.
- Attention seeking
- Persistent tiredness
- Wetting or soiling of bed or clothes

**Neglect:** Is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur if a parent or care-giver is physically or mentally unable to care for a child. A parent or care-giver may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising funding their addiction rather than food, clothing or warmth for the child. Neglect may involve failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

What to look for:

- regular poor hygiene;
- unkempt appearance;
- persistent tiredness;
- inadequate clothing;
- excessive appetite;
- failure to thrive e.g. poor weight gain;
- parents/care-givers who fail to seek medical treatment when their children are ill or injured
- children left in the care of unsuitable adults; and
- frequent anger, aggression or self-harm.

**Sexual abuse:** Involves forcing or enticing a child or adult at risk to take part in sexual activities, not necessarily involving violence, whether or not the child or adult at risk is aware of what is happening. The activities may involve physical contact, including assault by penetration (eg rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways such as sharing sexual images, 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. Child Sexual Exploitation is a form of sexual abuse which involved coercing a child into sexual behaviour in exchange for something (e.g. protection, money, items, affection, drugs or alcohol etc).

What to look for:

- Any direct disclosure made by a child or adult at risk concerning sexual abuse;
- Child or adult at risk with excessive preoccupation with sexual matters and detailed knowledge; of adult sexual behaviour, or who regularly engages in age inappropriate sexual play;
- Pre-occupation with sexual activity through words, play or drawing;
- Child who is sexually provocative or seductive with adults;

- Inappropriate bed sharing arrangements at home;
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations; and/or
- Other emotional signs may be indicative of sexual or some form of abuse.

### **Other Safeguarding Issues**

#### **Child-on-child Abuse**

Children can abuse other children (previously referred to as peer-on-peer abuse, which is more specifically abuse taking place between two children of a similar age) and it can take many forms such as physical, sexual and emotional bullying and abuse. It can happen both inside and outside of school or college and online, but it very often goes unseen. Any concerns regarding child-on-child abuse must be reported to the designated safeguarding lead.

Child on child abuse can include, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

All staff at Jamie's Farm understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Such abuse should be taken as seriously as abuse perpetrated by an adult and should not dismiss some abusive sexual behaviour as 'normal' between young people. Downplaying certain behaviours, for example dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up' or 'boys being boys' can lead to a culture of unacceptable behaviours, an unsafe environment for children and a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

#### **Child Sexual Exploitation ("CSE") and Child Criminal Exploitation ("CCE")**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education

### **Child Criminal Exploitation ("CCE")**

CCE is a form of child abuse which involves criminal exploitation and requires a safeguarding response. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to, or there appears to be an element of exchange.

Generally, CCE is typified by some form of power imbalance in favour of those perpetrating the exploitation. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### **Child Sexual Exploitation ("CSE")**

CSE is a form of child sexual abuse. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. CSE does not always involve physical contact, and can also occur through the use of technology.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they are tricked into believing that they are in a loving and consensual relationship so the sexual activity may seem consensual – this is called grooming and is a type of abuse. The child may not trust their abuser and not understand that they are being abused.

Some of the indicators of CSE are as follows:

- being secretive;
- being scared of some people, places or situations;
- physical signs of abuse for example bruises or bleeding in their genital or anal area;
- sexually transmitted infections;
- a sudden and/or urgent request to go on contraception or obtain the 'morning after pill';

- pregnancy;
- a sudden change in their family/relationship dynamics;
- having a new group of friends;
- involvement in a gang;
- involvement in criminal activities like drugs or shoplifting;
- having an older person who they view as their boyfriend or girlfriend;
- staying out late or overnight;
- going missing from home or care;
- stopping going to school or college; and
- a sudden change in physical appearance including clothes and hygiene levels.

Furthermore, the following are signs that a person might be grooming a child or young person:

- dressing inappropriately around the child or young person;
- giving special attention to a particular child or young person;
- isolating a child or young person from other people;
- giving gifts or money to a child or young person for no apparent reason;
- finding ways/reasons to be alone with a child or young person;
- viewing abusive images of children or young people;
- encouraging silence or secrets; or
- abusing alcohol.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money, making county lines a form of criminal exploitation. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Vulnerable children – those who are homeless, living in care homes, or trapped in poverty – may deliberately be targeted. These children are often unsafe, unloved, or unable to cope and gangs/organised criminal networks take advantage of this. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network- the children, young people or at risk adults involved may feel as though they have no choice but to continue to do what the gangs/ organised criminal networks want.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- receive high numbers of texts and/or phone calls;
- having money, new clothes or electronic devices and they cannot explain how they paid for them;

- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters; and/or
- have their bank accounts used to facilitate drug dealing.

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home (which can lead to behavioural, emotional, physical and long-term developmental problems), and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Everyone working with young people and families should be alert to the frequent inter-relationship between domestic violence and the abuse and neglect of young people.

### **Female Genital Mutilation ("FGM")**

FGM is also known as female genital cutting, female circumcision or some communities use local names for the practice such as Sunna, gudniin, halalays, tahur, megrez and khitan, among others. All staff, volunteers and trustees should speak to the designated safeguarding lead with regard to any concerns about FGM. Some FGM-practicing families do not see FGM as an act of abuse, however it has significant physical and mental health consequences and is illegal in the United Kingdom. As such, if any member of staff discovers that an act of FGM has been carried out on a girl under the age of 18, they must report this to the police.

### **Mental Health**

The emotional wellbeing of children and young people is just as important as their physical health. 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, although Jamie’s Farm staff may be well placed to identify children whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, this should be reported to the designated safeguarding lead or deputy.

### **Serious Violence**

Indicators which may signal children being at risk from, or involved with, serious violent crime may include: increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Risk factors which increase the likelihood of involvement in serious violence include: being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

## **10. Concerns Procedures**

- 10.1 All concerns and allegations of abuse will be taken seriously by trustees, staff, volunteers and apprentices and responded to appropriately.

- 10.2 It is not the responsibility of a member of Jamie's Farm staff to decide if abuse is occurring, but it is their responsibility to act on any concerns by reporting them.
- 10.3 If a member of staff, volunteer or apprentice has a concern regarding a child or adult at risk's safety or welfare they should discuss their concerns with one of the DSLs on their site, or in the absence of either DSL for that site, it should be brought to the attention of the DSL for Jamie's Farm. The DSL, without necessarily identifying the child or adult at risk in question, could discuss concerns with senior colleagues in another agency in order to develop an understanding of the child or adult at risk's needs and circumstances.
- 10.4 All concerns or incidents regarding the safety or wellbeing of a child or adult at risk must be recorded immediately within one working day of a concern arising. Concerns must be recorded using the Jamie's Farm Safeguarding & Cause for Concern referral form: [Jamie's Farm Safeguarding and Cause for Concern form \(office.com\)](#) which will be sent to the DSL and a copy saved in the secure area of our shared drive.
- 10.5 Where a child is considered to be at risk, a referral to children's social care should be made via the child's school or organisation responsible for arranging the visit (through the lead adult or teacher with responsibility for safeguarding as appropriate).
- 10.6 Where there is a risk to the life of a child or adult at risk or a likelihood of serious immediate harm, Jamie's Farm DSLs should quickly contact an agency with statutory child protection and safeguarding powers i.e. children's social care, NSPCC or the police to secure the immediate safety of the child or adult at risk.
- 10.7 The DSL's responsibilities do not include investigating suspected abuse. This is the role of children's social care or the police who have statutory powers and obligations (see contact details).
- 10.8 If for any reason the DSL cannot be contacted, the following organisations can be contacted for advice:
  - 10.8.1 Concern about a child - You should contact the Local Authority Children Services. Use the <https://www.gov.uk/find-local-council> website to find the Local Authority Services for your area.
  - 10.8.2 NSPCC: <https://www.nspcc.org.uk/>
  - 10.8.3 In an emergency, where you think that a child, young adult or adult at risk, may be in immediate danger, call the Police on 999.

**11. Please see *Managing Allegations of Abuse against Staff Procedures* and *Low-Level Concerns Procedures*.**

**12. Handling Disclosures**

- 12.1 When a young person discloses information about abuse to a member of staff, it may be done indirectly rather than directly and be limited in detail. An abused young person is likely to be under severe emotional stress and the member of staff may be the adult with whom the young person feels safe to talk.
- 12.2 If a disclosure of any kind of abuse is made, it is important to seek support. There are some things that members of staff can do to assist the child, young person or adult at risk such as gathering information that may be helpful in an investigation such as names, ages, social media handles, telephone numbers or vehicle registration numbers.
- 12.3 In any discussions with the child, young person or adult at risk:

**DO:**

- Be accessible and receptive, listen carefully and make it clear that you believe them and take it seriously;
- Reassure the child or adult at risk that they are right to tell and that the abuse was not their fault;
- See what immediate help they may need, such as medical attention;



- Negotiate getting support for the child or adult at risk;
- In accordance with the Policy, make careful records of any disclosure recording what was said using the young person's own words as soon as is practicable following the disclosure. Complete a Safeguarding Referral Form electronically and send to the DSL;
- Tell the child or adult at risk who you will be telling and why;
- Explain what you will do next; and
- Report what the child or adult at risk has told you as soon as possible.

12.4 Remember that an allegation of child abuse or neglect may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse.

#### **DO NOT:**

- Jump to conclusions;
- Show shock or disbelief, even if you feel it. Do not say things like "are you sure?", "why didn't you tell me before?";
- Directly question the young person or suggest words for them to use;
- Try to get the young person to disclose all the details;
- Speculate or accuse anybody;
- Promise things you cannot guarantee, for example keeping any disclosure a secret; or
- Confront the alleged abuser.

### **13. Safe Touch Policy**

13.1 Jamie's Farm recognises the value of children receiving physical affection and warmth, which are key to a child's healthy emotional and social development.

13.2 However, it is important to be aware that some children may view physical affection as a prelude to abuse. Many young people will not expect physical contact with adults at Jamie's Farm, as they are unlikely to have physical contact with adults in their school setting. Therefore, Jamie's Farm staff must exercise caution and consideration to avoid making young people feel uncomfortable and to protect themselves from allegations. Even well-intentioned physical contact may be misconstrued by a young person or observer and therefore adults must always be prepared to justify their actions.

13.3 It is also important to be aware that some children who have experienced abuse may seek inappropriate contact. Jamie's Farm staff should be particularly mindful of this when it is known that a child, young adult or adult at risk has suffered previous abuse or neglect. In all circumstances where a child, young adult or adult at risk initiates inappropriate physical contact, it is the responsibility of the Jamie's Farm staff member to sensitively deter them and help them understand the importance of personal boundaries.

13.4 Physical contact should take place only when it is necessary in relation to a particular activity – activities which involve physical contact with children, young adults or adults at risk could create potential situations where sexual abuse could go unnoticed. Adults must only touch children in ways which are appropriate in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. It must never be assumed that it is acceptable to touch a child as a means of communication. Any physical contact should take place with a young person's permission and, as far as possible, in a safe and open environment (ideally an environment easily observed by others). Jamie's Farm staff must be sensitive to any discomfort expressed verbally or non-verbally by a child.

13.5 Jamie's Farm staff should always ask before initiating a hug with a child and ensure that the child knows it is OK for them to say 'no'. Jamie's Farm staff should never provide physical contact in a way that could be misunderstood, misinterpreted or be physically restraining.

When a child initiates a hug with a member of Jamie's Farm staff this may be reciprocated if it feels safe and appropriate to do so.

- 13.6 Jamie's Farm staff should closely supervise children and adults at risk who have a history of sexual abuse when playing with others, give careful consideration to where they play and avoid tickling and wrestling games.
- 13.7 In summary and accordingly, Jamie's Farm staff should:
  - 13.7.1 Treat children, young adults and adults at risk with dignity and respect and avoid contact with intimate parts of the body;
  - 13.7.2 Always explain to the child, young adult or adult at risk why contact is necessary and what form that contact will take;
  - 13.7.3 Consider alternative actions (where it is anticipated or possible that a child, young adult or adult at risk might misinterpret any such contact);
  - 13.7.4 Be familiar with and follow recommended guidance and protocols;
  - 13.7.5 Conduct activities where they can be seen by others; and
  - 13.7.6 Be aware that gender, sexuality or culture may have implications for physical contact.
- 13.8 Any instances in which physical contact could have been misinterpreted should be recorded and reported to the DSL.

#### **14. First Aid**

- 14.1 Jamie's Farm staff may volunteer to undertake first aid tasks, but they should be suitably trained and qualified before administering first aid and/or any agreed medication, except in life threatening situations or when operating with professional guidance e.g. from the emergency services. When administering first aid, wherever possible, adults should ensure that another adult is aware of the action being taken.

#### **15. Physical Intervention Policy**

- 15.1 At Jamie's Farm, physical contact with children and adults at risk may occur under many circumstances (e.g. physical prompts, providing comfort). Staff should feel able to provide such support whilst following Jamie's Farm Safe Touch guidelines. The term physical intervention refers to any method of responding to unsafe behaviour which involves some degree of direct physical contact to limit movement. There are two types of physical intervention: restrictive and non-restrictive. An intervention is restrictive when an element of force is used.
- 15.2 Any physical intervention must be consistent with the concept of "reasonable force" (i.e. the circumstances must warrant its use and the degree of force must be proportional to the circumstances i.e. using no more force than is needed in the circumstances for the shortest time possible) and is used to prevent harm to that person, other people or property. It should constitute the minimum intervention necessary to resolve the crisis. Opting to do nothing is as much a decision as responding: it would be negligent to allow a child to place themselves or others at risk of harm.
- 15.3 Physical intervention carries a risk of injury both to staff and young people and should be avoided wherever possible. Other methods of managing crisis must always be attempted first and physical intervention only used as a last resort e.g. planning for high risk situations. There are two types of last resort: when everything else has been tried and when the risk is immediate (last resort becomes first resort).
- 15.4 Restraint must not:
  - 15.4.1 Involve hurting the individual being restrained;
  - 15.4.2 Involve deliberately inflicting pain on the individual being restrained;
  - 15.4.3 Involve prone or supine holds, or holding against joints;
  - 15.4.4 Restrict the individual's breathing;
  - 15.4.5 Involve contact with sexually sensitive areas; or

- 15.4.6 Involve locking the individual in a room.
  - 15.5 Any interventions used should be used within the context of being child-centred and trauma-informed.
  - 15.6 Any interventions should avoid touching or holding individuals in a way that compromises dignity or human rights.
16. During any incident the person restraining should:
- 16.1 Approach the individual calmly but firmly;
  - 16.2 Offer verbal reassurance to the individual;
  - 16.3 Cause the minimum level of restriction of movement;
  - 16.4 Try to reduce the danger of any accidental injury; and
  - 16.5 Maintain a calm and measured approach throughout.
  - 16.6 Medical assistance must be sought and restraint should cease if there are indications that the child who is/has been physically intervened is in distress, has been injured or is showing signs of deteriorating health such as sudden change in colour, difficulty breathing or vomiting.
  - 16.7 Any procedure that involves restrictive intervention should be set down in writing on the Incident Report Form (see appendix), which should be signed, dated and given to the DSL for the relevant site, who will liaise with visiting staff and securely save a copy on our shared drive.

## **17. Anti-bullying**

- 17.1 There is no legal definition of bullying, however it may be broadly termed as deliberately hurtful, unwanted, and usually repeated over a period of time, behaviour to one person or group by another person or group. Bullying can take many forms, but the three main types are: physical (e.g. hitting, kicking, theft), verbal (e.g. threats, name calling) and emotional (e.g. excluding an individual/ a group from activities). It can happen in person or online.
- 17.2 The harm inflicted by bullying (including bullying online) can frequently be underestimated; it can cause considerable distress to children, young adults and adults at risk.
- 17.3 Jamie's Farm will not condone bullying inflicted on or by children. Any physical violence by a child on another child during a visit will be stopped immediately. Any sexist, racist, homophobic or other derogatory remarks will be highlighted as unacceptable.
- 17.4 Where bullying, wherever it happens, is observed or highlighted by a child or adult at risk as a live issue, this will be referred to the staff member from the child or adult at risk's organisation to be dealt with according to their organisational policy.
- 17.5 Jamie's Farm actively discourages any forms of bullying and will explore with young people the dynamics of bullying both from the point of view of persecutor and victim, and help raise awareness and responsibility for this type of behaviour occurring.
- 17.6 Whilst bullying itself is not against the law, bullying behaviour can amount to harassment if it relates to characteristics which are 'protected' by the Equality Act 2010, those being: age; disability; gender reassignment; race; religion or belief; sex and sexual orientation.

## **18. Media (photography, video and online)**

- 18.1 This Policy should be read in conjunction with the Jamie's Farm [Photography and Video Policy](#).
- 18.2 Children cannot be photographed or videoed without prior consent from their parent or guardian.
- 18.3 Children are not allowed on the internet unsupervised at Jamie's Farm. Any access to technology whilst children are at the Farm will be closely monitored by adults. All staff computers will be password protected to ensure that children cannot access them unaccompanied.
- 18.4 Staff and volunteers are advised in their induction that they are not allowed to take photos or videos using their personal equipment (mobile phones, iPads etc) of children or use any

photos/videos of children in social media, but may be asked to take photos/videos of children using Jamie's Farm equipment

- 18.5 Jamie's Farm staff only take photos or videos of children using Jamie's Farm devices (mobile phones, iPads, cameras etc) and do not take or save any images to devices which are for personal use. Any images/ videos will be saved onto the charity's secure shared drive and deleted from equipment at the earliest opportunity.

## **19. Travel Policy**

- 19.1 Jamie's Farm staff will give careful consideration to who travels alone in a car with a child or adult at risk. Permission must be given by a member of visiting staff for a young person to travel alone in a vehicle with a member of Jamie's Farm staff and the young person will always be given the option to say no.
- 19.2 If there is any concern and this is unavoidable, the child or adult at risk should sit in the back of the vehicle.
- 19.3 All vehicles should be roadworthy, insured and have age-appropriate seats and seatbelts: legally a child can be restrained with just an adult seat belt once they have reached **EITHER** 135cm in height **OR** their 12th birthday, whichever one of the two comes first.
- 19.4 On occasions, unaccompanied children will travel to the farm using public transport with their parent's consent.

## **20. Visitors**

- 20.1 All visitors to a Jamie's Farm site must report to the office to sign in with a member of staff. All visitors are recorded in a physical or electronic visitor book and given a safeguarding briefing on arrival. No visitor will be left alone with a young person at any point without the permission of the visiting organisation (for example, if an additional member of school staff is visiting their students at the Farm.)

## **21. Abuse of Trust**

- 21.1 Abuse of Trust is distinct and different from sexual abuse or other abuse.
- 21.2 Abuse of Trust relates to all relationships where one person is in a position of responsibility and power in relation to another person, who is either under 18 years or is an adult, whether the relationship is of a heterosexual or homosexual nature.
- 21.3 Abuse of Trust relates to paid employees, ex-employees, unpaid staff (for example trainees and students), volunteers, apprentices, foster carers, consultants and contractors.
- 21.4 Abuse of Trust occurs where the person in a position of trust betrays the trust and enters into a relationship, particularly a sexual relationship, but also other abusive relationships, with a child/young person or adult at risk, for whom they have responsibility.

## **22. Communicating with young people beyond their visit**

- 22.1 Jamie's Farm staff and volunteers may not have ongoing direct communication with a young person after their visit to the farm. Any communication initiated by a young person towards a member of staff or volunteer after their visit, including sending a friend request on a social media platform, must be reported to the DSL at the farm they visited.
- 22.2 Communication between Jamie's Farm and young people who have visited the farm may take place through visiting school/organisation staff, the Jamie's Farm social media pages, website or e-newsletter. Should children or adults at risk communicate with members of Jamie's Farm staff directly they will be responded to preferably within 24 hours, but by the end of that week, in the following ways:
- emails will be replied to, with another member of JF staff and a member of staff from the child's school being copied in;

- letters will be replied to with a copy of the letter kept on file in our online storage system.
  - Messages on social media will be replied to and a screenshot will be sent to the DSL as well as a member of staff from the young person's school/visiting organisation.
- 22.3 All communication will be supportive, friendly and honest, however will have clear boundaries, avoiding unsuitable or over-reliant relationships.
- 22.4 On occasional circumstances, Jamie's Farm staff may contact young people who have visited the Farm regarding specific Jamie's Farm programmes (eg. ambassador programme or youth champions) or participation in Jamie's Farm events, such as open days. This contact may be via email, telephone or a messenger service. Any contact must be made using a Jamie's Farm device, not a personal device. Another member of Jamie's Farm staff must always be copied into communication with a young person and, where possible, the young person's parent, carer or a member of visiting staff.

### **23. Jamie's Farm Apprentices**

- 23.1 Jamie's Farm work with apprentices, aged 16 or older, who support the delivery of the programme and work directly with visiting young people, under the guidance and supervision of Jamie's Farm staff.
- 23.2 Apprentices are subject to an enhanced DBS check with barring list and are required to read our Child Protection and Safeguarding Policy and Code of Conduct and sign a personal disclosure form.
- 23.3 Apprentices are monitored and supervised and will learn about child protection and safeguarding in accordance with their roles and responsibilities to ensure they are confident and competent to carry out these responsibilities.
- 23.4 Jamie's Farm Apprentices will be present in some, but not all, staff meetings. They will not attend meetings where sensitive information is shared relating to visiting young people.
- 23.5 Apprentices will be present at some, but not all, staff events. They will not attend all staff social events.
- 23.6 Any concerns about the wellbeing or safety of a Jamie's Farm Apprentice will be referred to the DSL on the site at which they are working. These concerns will be referred to the DSL at the educational centre providing the apprenticeship.
- 23.7 When overnight accommodation is required for an apprentice, it will be separate to that of any visiting young people, visiting staff or Jamie's Farm staff.
- 23.8 Apprentices will not have access to bedrooms for visiting young people during their stay.
- 23.9 Any written communication with apprentices (including email, text or WhatsApp messages) must include 2 members of Jamie's Farm staff.
- 23.10 All activities and events where Jamie's Farm staff and apprentices are present should be for the purpose of training, development or the Jamie's Farm programme.

### **24. The Prevent Agenda**

- 24.1 In response to the government's efforts to combat radicalisation, they have issued guidance for all professionals who are working with children.
- 24.2 A key element of this is to consider radicalisation as a Child Protection and Safeguarding issue, that must be seen with such gravity and responded to with consequent due process.
- 24.3 As a result, Jamie's Farm staff will be trained according to Prevent protocols in order that they are aware of the key indicators children at risk of radicalisation may show;
- 24.3.1 In saying this, it is important to recognise that in the immersive and residential experience we create, there is a greater likelihood of such indicators being exhibited;
- 24.3.2 What to look for:
- Silence during certain discussion considering morals and ethics or geopolitics around the table – a sense of isolation in these matters could be an indication that his or her beliefs

are perceived as being radical. This could be particularly significant when the individual's inherent personality is very different from this;

24.4 Where a member of Jamie's Farm staff has any concerns that those indicators are being shown, it is crucial that they follow through with their concerns consistent with the process outlined above;

24.4.1 Specifically, it is crucial that they log their concern in the appropriate way and with the appropriate individuals – namely the DSL for the location in which they work, who can then liaise directly with the DSL of the school/visiting organisation in order that actions to mitigate the risk can be put in place.

## **25. Confidentiality**

25.1 The protection of the child is the key priority when ensuring the confidentiality of all information stored about children. Adults may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances they may have access to or be given highly sensitive or private information. Such information must not be used to intimidate, humiliate, or embarrass the child or young person concerned.

25.2 The safe and secure storing and processing of personal information about children and young people is governed by the Data Protection Act 2018 and General Data Protection Regulation 2018, now the UK GDPR. Please ensure you are familiar and compliant with our lawful basis for processing confidential information. Further information on how and why Jamie's Farm collects, stores, uses, and shares personal information, together with the rights of data subjects in relation to their personal information and the details of complaints procedures, is contained in the Privacy Notice.

25.3 Sensitive information about children, such as a Safeguarding/Cause for Concern referral form, will be stored securely in an online file only accessible by designated members of Jamie's Farm staff. When shared with visiting school/organisation DSLs, individual permission to access files will be given and emails will be sent encrypted.

25.4 Due to the nature of the work taking place at Jamie's Farm careful consideration must be given about the sharing of information which is disclosed by children or adults at risk.

25.5 In deciding whether there is a need to share information you need to consider your legal obligations including:

- whether the information is confidential; and
- if it is confidential, whether there is a public interest sufficient to justify sharing it is important to remember that data protection law is not a barrier to sharing information about safeguarding to promote the welfare, and protect the safety, of children, young adults and adults at risk, which must always be the paramount concern.

25.6 Not all information is confidential. Confidential information is information of some sensitivity, which is not already lawfully in the public domain or readily available from another public source, and which has been shared in a relationship where the person giving the information understood that it would not be shared with others. For example, a teacher may know that one of her pupils has a parent who misuses drugs. That is information of some sensitivity, but may not be confidential if it is widely known or it has been shared with the teacher in circumstances where the person understood it would be shared with others. If however it is shared with the teacher by the pupil in a counselling session, for example, it would be confidential.

25.7 Confidence is only breached where the sharing of confidential information is not authorised by the person who provided it or to whom it relates. If the information was provided on the understanding that it would be shared with a limited range of people or for limited purposes, then sharing in accordance with that understanding will not be a breach of confidence. Similarly, there will not be breach of confidence where there is explicit consent to the sharing.

- 25.8 Even where sharing of confidential information is not authorised, you may lawfully share it if this can be justified in the public interest. Seeking consent should be the first option, if appropriate. Circumstances in which sharing confidential information without consent will normally be justified in the public interest. are:
- when there is evidence that the child is suffering or is at risk of suffering significant harm; or
  - where there is reasonable cause to believe that a child may be suffering or at risk of significant harm; or
  - to prevent significant harm arising to children and young people or *serious harm* to adults, including through the prevention, detection and prosecution of serious crime. (For the purpose of this guidance, serious crime means any crime which causes or is likely to cause significant harm to a child or young person or serious harm to an adult.)
- 25.9 Therefore, where you have a concern about a child or young person, you should not regard refusal of consent as necessarily precluding the sharing of confidential information.
- 25.10 The key factor in deciding whether or not to share confidential information is proportionality, i.e. whether the proposed sharing is a proportionate response to the need to protect the public interest in question. In making the decision you must weigh up what might happen if the information is shared against what might happen if it is not, and make a decision based on a reasonable judgment.
- 25.11 Jamie's Farm staff must make a judgement on the facts of the individual case. Where there is a clear risk of significant harm to a child, or serious harm to adults, the public interest test will almost certainly be satisfied. However, there will be other cases where practitioners will be justified in sharing some confidential information in order to make decisions on sharing further information or taking action – the information shared should be proportionate.
- 25.12 The approach to sharing information should be explained openly and honestly. Where this is done, children will be aware how their information may be shared, and experience shows that most will give consent. Please note that any child under 13 is not able to give their own consent as to whether this data can be processed by Jamie's Farm and this must be provided by whoever provides parental responsibility for the child unless there is a safeguarding concern regarding that individual. You must make reasonable efforts (using available technology) to verify that the person giving such consent does, in fact, hold parental responsibility, if consent is the lawful basis for processing the information. It may instead be our Legitimate Use (see UK GDPR 2018 for more information).
- 25.13 Information which is not confidential may generally be shared where that is necessary for the legitimate purposes of preventative work. Where information is confidential, however, and consent is refused, that should be respected, unless in the practitioner's professional judgment on the facts of the case, the public interest justifies the sharing of information.
- 25.14 Some questions to consider:
- Is there a legitimate purpose for you or your agency to share the information?
  - Does the information enable a person to be identified?
  - Is the information confidential?
  - If the information is confidential, do you have consent to share?
  - Is there a statutory duty or court order to share the information?
  - If consent is refused, or there are good reasons not to seek consent to share confidential information, is there a sufficient public interest to share information?
  - If the decision is to share, are you sharing the right information in the right way?
  - Have you properly recorded your decision?

## **Internal Contacts**

**Designated Safeguarding Lead:** Katie Meanwell – [katiemeanwell@jamiesfarm.org.uk](mailto:katiemeanwell@jamiesfarm.org.uk)

**Co-CEO:** Jake Curtis – [jake@jamiesfarm.org.uk](mailto:jake@jamiesfarm.org.uk)

**Safeguarding Trustee:** Rebecca Boomer-Clark

## **External Contacts**

NSPCC National Centre, 42 Curtain Road, London, EC2A 3NH

Adult Help and Advice 0808 800 5000

Help for young people 0800 1111

Childline: Freepost 1111, London, N1 0BR

Samaritans – 0345 909090

## **LOCAL:**

### **Wiltshire Safeguarding Vulnerable People Partnership**

[Wiltshire Safeguarding Vulnerable People Partnership \(wiltshirescb.org.uk\)](http://wiltshirescb.org.uk)

Email: [SVPP@wiltshire.gov.uk](mailto:SVPP@wiltshire.gov.uk)

Telephone: 01225 718093

### **Herefordshire Safeguarding Children Partnership**

<https://herefordshiresafeguardingboards.org.uk/herefordshire-safeguarding-children-partnership>

Email: [admin.sbu@herefordshire.gov.uk](mailto:admin.sbu@herefordshire.gov.uk)

Telephone: 01432 260100

### **East Sussex Safeguarding Children Partnership**

[Home - ESSCP](#)

Email: [ESSCP.contact@eastsussex.gov.uk](mailto:ESSCP.contact@eastsussex.gov.uk)

Telephone: 01273 481544

### **Monmouthshire Safeguarding Board**

[Welcome to the Gwent Safeguarding website - Gwent Safeguarding](#)

Telephone: 01291 635669 (Out of Hours Emergency Team: 0800 3284432)

Email: [childduty@monmouthshire.gov.uk](mailto:childduty@monmouthshire.gov.uk)

### **North Yorkshire Safeguarding Children Partnership**

[NYSCP \(safeguardingchildren.co.uk\)](http://nyscp.org.uk)

Email: [nyscp@northyorks.gov.uk](mailto:nyscp@northyorks.gov.uk)

Telephone: 03001 312123

## **Police**

Emergency telephone: 999

Non-emergency telephone: 101

Independent Organisation – [www.offtherecord-banes.co.uk](http://www.offtherecord-banes.co.uk) for Young people, parents, carers, other concerned individuals giving advice and counselling.

‘Shout Out’ for children and young people, free, confidential and independent advice 0800 3895551



## **Reference materials**

The Children's Act 2004 <https://www.legislation.gov.uk/ukpga/2004/31/contents>

Complying with the code of practice <https://www.gov.uk/government/publications/dbs-code-of-practice>

Vetting and Barring System <https://www.gov.uk/government/organisations/disclosure-and-barring-service>

*Safeguarding Children and Young People: Roles and Competences for Health Care Staff* (2014);

*Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children* 2023. <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

*Information sharing:* <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

*UKCP Standards of Education and Training, Guidelines for Section and Institutional Members for the Development of Codes of Practice and Professional Conduct for Working with Children* <https://www.psychotherapy.org.uk/wp-content/uploads/2018/10/Codes-of-practice-and-professional-conduct-for-working-with-children.pdf>

*Safe recruitment of trustees* Charity Commission CC30

*National Service Framework for Children, Young People and Maternity Services Core Standards* and in particular, Standard 5, *Safeguarding and Promoting the Welfare of Children and Young People.* <https://www.gov.uk/government/publications/national-service-framework-children-young-people-and-maternity-services>

*The Use of Force to Control or Restrain Pupils*

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

*Keeping Children Safe in Education, for Schools and Colleges, 2023*

[Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

*Keeping Children Safe in Education, for Schools and Colleges, 2024*

[Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Data Protection Act 2018

<http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>"<http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>