

Free to Be Kids

Policy & Procedures Manual



Last updated: **May 2023**

Child Protection & Safeguarding

Scope of this policy

This policy outlines the duties, procedures and support framework which Free to Be adopts in order to keep children safe, and to respond to any concerns regarding safety or wellbeing, whilst young people are participating in Free to Be services, programmes or projects.

It applies at all times and to all volunteers, staff, interns, students or others who volunteer, work, or otherwise represent Free to Be.

This policy also applies to Young Leaders both from the perspective of them holding the same responsibility to adhere to these policies and procedures in order to keep children safe; and from the perspective that legally Young Leaders remain children and have the right to be kept safe whilst volunteering with Free to Be.

The Free to Be Leadership Team must ensure a copy of this policy is provided to all volunteers, staff, interns, students or others who volunteer, work, or otherwise represent Free to Be within the induction process. As part of the induction process the responsible member of the Free to Be Leadership Team or project Co-ordinator must confirm that this policy has been both read and understood with Inductees signing to confirm receipt, understanding and acceptance.

This policy should be read in conjunction with Free to Be's policy sections on Supporting Children's Behaviour, Risk Management and Recruitment & People Management. (Including the Code of Conduct.)

Statement of intent:

Free to Be adopts the following key principles as at the heart of its child protection policy:

- At all times every child has the right to be safe.
- At all times every child has the right to feel safe.
- At all times every child has the right to have any concern regarding their safety or wellbeing responded to swiftly, robustly, in line with UK law and sector best practice, and in a way which recognises the complexity and uniqueness of their individual situation in the context of their universal right to safety and security.
- The welfare of the child must always be the primary consideration throughout all Free to Be's activities.
- That these principles form the most important aspect of Free to Be's work with young people.

As an organisation specialising in work with children whose backgrounds include substantial disadvantage and vulnerability, Free to Be recognises the unique set of risks and challenges that go alongside this. Free to Be further recognises that both its focus on residential work and its reliance upon volunteer staffing brings with it particular risks notwithstanding the many opportunities this model creates. Accordingly, the Trustees undertake to adopt, disseminate, regularly review and maintain a policy framework, set of procedures and to promote an organisational culture, which ensures children's safety and wellbeing is prioritised throughout all aspects of Free to Be's work.

In addition to the duties outlined above, Free to Be's core operating principles promote children's right to feel special, prioritised, heard and valued and Free to Be undertakes to embed these principles throughout all practice, including safeguarding practice.

Key concepts – what effective safeguarding looks like:

Free to Be believes that the following key concepts underpin what effective safeguarding should look like throughout the organisation:

Communication: talking through issues in the right forums, sharing thoughts or potential

emerging concerns at the earliest stage. Never sitting on worries.

Listening: spending time with young people, and listening actively. Recognising that this takes time and space which need to be prioritised.

Being aware, curious and reflective: Always thinking "what could the other explanation be?"

Emotional bravery: talking with children who are distressed and being interested and attentive in listening to their verbal, and non-verbal, responses.

Mindful boundaries: balancing working closely alongside young people and 'being human' with understanding safe boundaries and their importance to the young people.

Responsiveness: acting within the right timescales for the young person.

Genuine engagement with risk: managing and engaging with the realities of risk rather than believing all risk can be removed from young people's lives.

Rigour: implementing and reviewing robust procedures; practicing 'safe recruitment' and ensuring all volunteers receive the right training and support.

Honesty, Integrity & Respect: creating an atmosphere on projects which supports everyone to feel safe, prioritised, valued and included.

Legislative framework:

Free to Be's child protection and safeguarding policy must at all times adhere to the latest statutory policy requirements and to the most recent child protection procedures set out by the Local Safeguarding Children Board, or other equivalent successor organisation, for the area within which Free to Be's office is registered.

Accordingly current policies adhere to relevant statutory requirements as laid out via the *Children Acts of 1989 & 2004* and *Working Together to Safeguard Children, 2015*. Procedures adhere to the framework set out in the *London Child Protection Procedures 2017 revision*.

Although the scope of Free to Be's operations mean the organisation does not fall under the regulatory remit of Ofsted, procedures are informed where relevant by the provisions which would apply were this to be the case. Procedures are further informed by reference to relevant guidance and research published by sector leaders in the fields within which Free to Be's core activities operate including guidance published by the NSPCC, Play England, The Outward Bound Trust and The Council for Learning Outside the Classroom amongst others.

Key terms:

Free to Be adopts the NSPCC's definitions of the terms 'child protection' and 'safeguarding':

Safeguarding: 'is the action that is taken to promote the welfare of children and protect them from harm. It includes: protecting children from the potential for abuse and maltreatment; preventing harm to children's health or development; ensuring children grow up with safe and effective care; taking action to enable all children and young people to have the best outcomes.'

At Free to Be 'safeguarding' covers all steps taken, from safe recruitment practices to the careful structure and design of programmes and projects, which together aim to ensure that children attending Free to Be both are safe and feel safe. These steps aim to ensure children's time with Free to Be is as physically, emotionally and psychologically rewarding as possible.

Child protection: 'is part of the safeguarding process. It focuses on steps to protect individual children identified as suffering, or likely to suffer, significant harm. This includes child protection procedures which detail how to respond to concerns about a child.'

At Free to Be 'child protection' means the detailed steps which must be taken in response to any concern that a child is suffering significant harm or may be at risk of such harm, either within Free to Be or within the child's wider life. This includes the specific training and support given to all staff and volunteers to maximise their capacity to identify, and act appropriately in response, to such concerns.

Definitions of Abuse and Harm:

Free to Be adopts the definitions provided within the latest iteration of the *London Child Protection Procedures*.

Specific definitions:

Abuse: *'A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.'*

Physical abuse: *'Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces illness in a child; see Fabricated or Induced Illness Procedure.'*

Emotional abuse: *'Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development, and may involve: conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person; imposing age or developmentally inappropriate expectations 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); seeing or hearing the ill-treatment of another e.g. where there is domestic violence and abuse; serious bullying, causing children frequently to feel frightened or in danger; exploiting and corrupting children.'* This category also includes radicalisation of a young person.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may also occur alone.

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 (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.*

Sexual abuse includes non-contact activities, such as involving children in looking at, including online and with mobile phones, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Any form of Female Genital Mutilation (FGM) is considered a form of both sexual and physical abuse.

In addition; Sexual abuse includes abuse of children through sexual exploitation. This includes any attempt to encourage or coerce sexual activity by a child. This is a criminal offence. Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. However, where a child is under the age of 13 it is classified as rape under the Sexual Offences Act 2003.'

Neglect: *'Neglect is the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse, maternal mental ill health or learning difficulties or a cluster of such issues. Where there is domestic abuse and violence towards a carer, the needs of the child may be neglected. Once a child is born, neglect may involve a parent 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); ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional, social and educational needs.'

Domestic Abuse: 'Research analysing Serious Case Reviews has demonstrated a significant prevalence of domestic abuse in the history of families with children who are subject of Child Protection Plans. Children can be affected by seeing, hearing and living with domestic violence and abuse as well as being caught up in any incidents directly, whether to protect someone or as a target. It should also be noted that the age group of 16 and 17 year olds have been found in recent studies to be increasingly affected by domestic violence in their peer relationships.'

The Home Office definition of Domestic violence and abuse was updated in March 2013 as: *"Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence and abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender and sexuality. Domestic abuse not only encompasses direct or threatened physical violence, but can include any of the following types of abuse: psychological; physical; sexual; financial; emotional.*

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim."

The vulnerable nature of families supported by Free to Be:

Typically, children referred to Free to Be face substantial challenges within their lives. For many this will include having experienced significant disadvantage and adversity as defined elsewhere within this document. Free to Be recognises that the prevalence of incidences/patterns of abuse or harm are likely to be significantly higher within the population of families supported by Free to Be given national statistics linking disadvantage and adversity to raised prevalence of ill-treatment, abuse and neglect. Free to Be undertakes to ensure all individuals supporting Free to Be children remain aware of this fact and the need for reflection, respectful challenge and an open minded yet informed and analytical approach when considering young people's expressed needs, statements, behaviours and actions.

Free to Be recognises that a proportion of young people accessing services are likely to have experienced difficult or harmful experiences within close adult relationships. For some this may have been compounded by unsuccessful or challenging relationships with authority figures or support services. This brings with it extra care and responsibilities in ensuring Free to Be's structures and organisational responses, and the actions of individuals representing Free to Be, appropriately reflect this.

In particular, Free to Be staff and volunteers should be made aware that children may misinterpret adult intentions and process these within the context of their own life experience. In particular children with histories of adversity may be more likely to misinterpret physical touch or expressed affection. As all children have an inherent need to receive appropriate affection and to have their expressions of need for appropriate physical touch acknowledged and responded to, this creates particular and complex challenges in terms of maintaining professional yet responsive boundaries. All adults supporting Free to Be children will need to be made aware of, and supported to develop and maintain, appropriate professional boundaries whilst also responding empathetically and mindfully to children's expressed need for care.

Role of the Designated Safeguarding Officer:

At all times Free to Be must have an appointed Designated Safeguarding Officer and Deputy Designated Safeguarding Officer. The identity and contact details of these individuals, along with appropriate out of hours' contact details, must be made available to all staff, volunteers or other

individuals representing Free to Be Kids within their induction process. Any change in the identity of the Designated Safeguarding Lead, their Deputy, or relevant contact details, must be communicated to all adults supporting Free to Be young people immediately.

Both the Designated Safeguarding Officer and their Deputy must attend and training relevant to their role. As a minimum this must include:

- Specialist certificated training for the role of Designated Safeguarding Officer run by an accredited provider; renewed every two years.
- Safer recruitment training; renewed every two years.

In addition to training requirements, the Designated Safeguarding Officer must hold sufficient relevant experience, knowledge and skills to enable them to perform this role effectively. As a minimum this must include:

- Past experience managing child protection situations and making referrals to statutory agencies.
- Past experience delivering training in sensitive subjects.
- Past experience working directly with vulnerable young people in risk situations.
- Previous management experience.
- Evidenced familiarity with the London Child Protection Procedures or equivalent procedures set out by other areas' Local Safeguarding Children Board or future equivalent body.

The Designated Safeguarding Officer must always be a member of the Free to Be Leadership Team.

The Primary Responsibilities of the Designated Safeguarding Officer are:

- To lead the organisation's response to any concern, complaint, allegation or other incident relating to child protection, safeguarding, young people's welfare or the actions or inactions of Free to Be staff/volunteers/other adults in response to such concerns.
- To oversee any child protection, child in need or early help referrals to Children's Social Care and the decision making processes regarding whether such referrals should be made.
- To act as the key point of contact with relevant external agencies including but not limited to Children's Social Care, Local Authority Designated Officers, Police Child Protection Units.
- To ensure all Free to Be staff, volunteers, young leaders or others supporting Free to Be young people receive appropriate training in child protection and safeguarding for their roles.
- To review and keep updated Free to Be's systems for keeping children safe.
- To lead on promoting an organisational culture which encourages all those supporting Free to Be children to feel confident in raising concerns regarding children's welfare.
- To review all Project Overview Reports within one week of receipt and provide an annual summary to the trustees in advance of each year's AGM detailing the contents of Project Overview Reports as regards child protection/safeguarding. This must as a minimum include the number of Concern and Incident forms completed; the number and nature of any referrals to Children's Social Care; number of any hospital visits; number of any incidents of physical intervention; number of any vehicle accidents.
- To at least every two years conduct a formal audit of Free to Be's child protection and safeguarding policies, procedures, staff/volunteers awareness of these and the organisational culture within which they are set, in order to ensure Free to Be remains compliant with the legal duties set out within section 11 of the Children Act 2004 or any subsequent relevant legislation. A report detailing the results of this audit must be provided to the trustees by the conclusion of the two-year review cycle.
- To provide guidance, consultation, reflective thinking space or any other support in relation to child protection/safeguarding requested or required by staff or volunteers.

Roles of other key individuals:

Trustees: The trustees are responsible for overseeing and quality assuring all areas of the charity's governance, including those areas relating to child protection and safeguarding. The trustees must appoint a trustee to act as Lead Trustee for Safeguarding. The primary

responsibility of this role is to lead trustee level scrutiny of the organisation's safeguarding systems and procedures and to work closely with the Designated Safeguarding Officer to ensure the organisation's responses to any safeguarding incidents are compliant with Free to Be policy.

Free to Be Leadership Team: Support the Designated Safeguarding Officer in their role and ensure that the necessary resources and structures are in place and functioning effectively to underpin robust safeguarding practice. The Leadership Team must proactively promote an organisational ethos and culture where awareness of safeguarding practices is prioritised.

Project Co-ordinators: Are responsible for ensuring Free to Be's safeguarding and child protection policies are implemented and adhered to throughout all aspects of the specific project they are coordinating. In particular Project Coordinators must:

- Recap core safeguarding procedures to all staff and volunteers at the start of project briefing. (Ensure at least the following is covered: RRRR – 'Recognise, Respond, Report, Record' inc. who to report to, timescales & how to report; managing disclosures policy; boundaries (inc social media), avoiding 1:1 situations & physical touch policy; managing concerns re adults inc. whistleblowing).
- Ensure blank Concern/Incident forms are available and accessible on the project.
- Ensure the office safeguarding noticeboard and Childline posters are displayed in a prominent location. (Except camping projects.)
- Ensure all staff/volunteers understand their duty to report any level of concern regarding a young person's welfare to the Project Coordinator the same day and that all staff/volunteers understand how to do this.
- Ensure completed Concern/Incident forms, any other child records or confidential information, is stored securely.
- Review and action any completed Concern/Incident form within 24 hours of receipt.
- Immediately inform the Designated Safeguarding Officer of any issue or concern reported to the Coordinator regarding a child potentially experiencing or be at risk of experiencing significant harm either on a Free to Be project or within their broader life.
- Liaise with the Designated Safeguarding Officer concerning ongoing management of concerns arising via Concern/Incident forms within the duration of the Project the Coordinator is leading. Jointly with the Designated Safeguarding Officer be responsible for ensuring any necessary safeguarding actions within the timescale of the project are completed professionally and in a manner accordant with the child's best interests.
- Liaise with the Designated Safeguarding Officer at the conclusion of the project and agree handover or ongoing responsibility for any ongoing safeguarding required to continue beyond the project's timescales.
- Complete the Project Overview Report and send this to the Designated Safeguarding Officer within one week of the project's conclusion.

All staff, volunteers, young leaders and other individuals supporting Free to Be young people: Free to Be seeks to promote an atmosphere on all projects of mutual embedded responsibility for safeguarding where everyone feels supported, skilled and confident in knowing how to respond to potential concerns regarding a young person's welfare. Accordingly, it is the responsibility of any individual supporting Free to Be young people to ensure any gap in their knowledge, skills or confidence is shared with the Project Coordinator so that appropriate support may be provided. Free to Be operates an 'if in doubt ask' ethos where seeking support and engaging in reflective thinking is positively encouraged.

Safer recruitment, training & support:

Free to Be's safer recruitment and training procedures are detailed within the Recruitment & People Management section of this document but are considered part of the organisation's formal child protection policy. Any review of Free to Be's child protection and safeguarding procedures must include a joint review of the safer recruitment and training procedures.

Core safer recruitment procedures:

- All new volunteers taking part in 'regulated activity' as defined by the Disclosure & Barring

Service are subject to an enhanced level DBS with barring list check. This may be obtained via the DBS update service but must include enhanced level and barring list information.

- All DBS checks must be renewed within a three year timeframe, meaning new checks must be completed and received before the three year anniversary of the original check.
- No volunteer, staff member or other individual will be permitted to attend a Free to Be project, other than as a supervised visitor, or have access to young people's information, without the above checks having taken place and been returned with no assessed relevant convictions, cautions or concerns.
- For the avoidance of doubt, the complex nature of Free to Be's work with children makes it likely that for the foreseeable future, all staff, volunteer, intern or student roles involving any level of contact with children will fall within the DBS definition of 'regulated activity'.
- Take up of two recent references which may not be provided by friends or family members. Where possible, references should include the current/most recent employer.
- Interviews by two members of the Free to Be Leadership Team or other appropriately experienced individuals to whom the Leadership Team delegate this duty. The interview must include questions exploring capacity to understand and adhere to Free to Be's safeguarding policies and value base.
- At the outset of every individual project, volunteers, staff, or others coming into contact with Free to Be children must sign the Project Volunteer Agreement Form which, for the purposes of this policy, confirms they have not been convicted, charged, arrested or been the subject of any allegation in respect of any offence which would cause harm to a child or vulnerable person.

Safeguarding training and support framework:

- New staff, volunteers or other adults working with Free to Be young people before attending any project on which children may be present must:
 - complete an Introductory Safeguarding & Child Protection certificated online course
 - attend in-person 'Safeguarding & Child Protection at Free to Be' training, led by the Designated Safeguarding Officer or appropriate other individual. This training must explain the core contents of this policy document; must provide opportunity for questions and discussion of example situations; and must aim to provide familiarisation with how core principles of child protection are put into practice on Free to Be projects, including who to contact in response to concerns.
 - receive a written copy of Free to Be's Policy & Procedures Manual, including the Safeguarding & Child Protection policy; Whistleblowing Policy; Supporting Children's Behaviour policies and the Code of Conduct at least two weeks prior to the project start date.
- All returning volunteers must repeat the 'Introduction to Safeguarding & Child Protection' certificated course three yearly.
- Trustees who are not having direct contact with Free to Be young people via taking part on projects, must still complete introductory online certificated Safeguarding & Child Protection training.
- Free to Be must keep records of training attendance and maintain systems allowing for an individual's compliance to be checked before invitation or attendance at a Free to Be project where children may be present.
- The Trustees and Leadership Team must consider annually what additional or more specialised training would benefit volunteers, staff or other relevant individuals to support Free to Be young people safely and more effectively.

The above standards represent Free to Be's minimum requirements. The comprehensive supplementary recruitment, training and support policies adopted by Free to Be are detailed within the Recruitment & People Management section of the Policy & Procedures Manual.

Steps which must be taken in response to any concern for a young person's welfare

- If at any point during any work or other interaction with Free to Be young people any adult,

volunteer or other individual representing Free to Be becomes concerned regarding the welfare of a young person, that individual must report the concern to the Project Coordinator as soon as practically possible and always on the same working day as the concern arose.

- If the concern arises outside of a Free to Be project, the concern should be reported to the Designated Safeguarding Officer within the same timescales. Contact details for the Designated Safeguarding Officer are available on the first page of the Free to Be Policy & Procedures Manual or from any member of the Free to Be Leadership Team.
- A 'concern' is defined as any information, observation, comment, or other sense that leaves an individual feeling at the least ill at ease regarding any aspect of a young person's wellbeing. Free to Be's threshold as to what constitutes 'a concern' and therefore requires reporting and discussion with a Project Coordinator is deliberately set very low in order to ensure even fledgling concerns are explored at an early stage. This does not mean that every reported concern will require further action, but promotes the maximum opportunity to respond effectively and in a timely manner to concerns for young people.
- For the purpose of clarity, any suspicion that a young person may be experiencing, have previously experienced or be at risk of in future experiencing any form of harm, abuse or neglect as per the definitions above, must be immediately reported in accordance with the above procedures.
- In order to avoid delay, should the concern relate to a young person potentially being at risk of immediate harm, the report must be made verbally immediately to the Project Coordinator or Designated Safeguarding Officer and not be made by way of written concern form.
- The Project Coordinator or Designated Safeguarding Officer receiving the concern must immediately upon receipt of a verbal concern or reading of a Concern Form:
 - Seek to determine whether any risk of immediate harm is apparent and if so follow the steps laid out in the relevant section below.
 - Seek to determine whether any actual or risk of significant harm, whether or not immediate, is apparent, following the steps in the relevant section below if so.
 - plan what response, support or other actions are required to keep the young person safe whilst on the Free to Be project and what further actions might be required in order to keep a young person safe outside of Free to Be projects;
 - ensure the reporting individual is supported to record the concern on a Concern Form if not already completed;
 - ensure the reporting individual is given appropriate support both in terms of their own experience in hearing/witnessing concerning information and in regards to any further actions being requested of them.
 - should the concern relate to risk of significant harm, whether or not immediate, inform the Designated Safeguarding Lead the same working day and liaise with them regarding further planning and actions, including regarding any onward referrals the Designated Safeguarding Lead may assess as required.
 - Seek support from the Designated Safeguarding Lead or any other member of the Free to Be Leadership Team as needed in order to fulfil these responsibilities.

Steps which must be taken if significant or immediate harm is suspected:

'Immediate significant harm' means a child is at risk within the next few hours of harm which would be likely to cause serious physical injury, extreme distress or trauma.

'Significant harm' means a child is at risk of harm which would be likely to cause serious physical injury, extreme distress or trauma. The harm may arise via a one-off incident or via incremental patterns of exposure to harmful situations over time.

If a child is thought to be at risk of immediate harm, the Police must be called without delay. In an emergency situation, this will need to be done by the Free to Be adult who is present on the scene. However if the situation is not an emergency the staff member or volunteer should consider whether time safely allows for them to first call the Project Coordinator to seek emergency advice and support. In turn the Project Coordinator should consider whether time safely allows them to contact the Designated Safeguarding Officer prior to calling Police.

In all situations where a child is suspected to have experienced, or be at risk of experiencing, any form of significant harm, the matter must be reported to the Project Coordinator the same day. If the concern arises on a day where the young person is due to return home, the concern must be reported to the Project Coordinator before the young person leaves the Free to Be project site.

On receiving a report of potential or actual significant harm, the Project Coordinator must:

- Consider and take any immediate steps required to ensure the child's safety.
- Contact the Designated Safeguarding Officer to agree an action plan to support the child which must also include determination regarding whether the information received meets the threshold for onward referral to Children's Social Care; what additional information may assist in making this decision; and whether and at what stage the child's parents should be informed.
- For the avoidance of doubt:
 - Any situation where information suggests a child is suffering or is at risk of suffering significant harm must be referred to Children's Social Care in the area within which the child lives within 24 hours.
 - Children's parents must be informed of referrals to Children's Social Care unless to do so would place a child's safety at risk, in which case parents must not be informed and the advice of Children's Social Care sought.

Referrals to Children's Social Care or other statutory agencies:

All referrals to Children's Social Care, Children & Young People's Mental Health Services, or other statutory organisations must be discussed prior to referral with the Designated Safeguarding Officer, or in their absence their Deputy, unless to do so would place a young person at risk of harm due to delay.

Referrals for children not known to have an allocated social worker should initially be made by telephone to the Multi-Agency Safeguarding Hub (MASH) within the area in which the child resides. Referrals for children who do have an allocated social worker should be made to the allocated social worker, or in their absence to the duty social worker in that team. Non-emergency referrals will not be considered complete nor acted upon by Children's Social Care until followed up in writing which must be done within 24 hours of the initial call. Referrals should be made on the referral form made available by the Children's Social Care team and contain all relevant information held by Free to Be. If the form is submitted by email, it must be sent from a Free to Be email address. Unless specifically required, the identity of individual volunteers should not be disclosed within referrals with referrals being made by Free to Be as an organisation.

Copies of any referral sent to Children's Social Care must be cc'd or forwarded to the Free to Be safeguarding mailbox: safeguarding@freetobekids.org.uk. The Designated Safeguarding Officer must review all referrals sent; must ensure all referrals sent are safely received; and must ensure all referrals are followed up within 72 hours to obtain an outcome. Copies of all referrals sent along with the completed Free to Be concern form and the confirmed outcome from Children's Social Care must be stored within the safeguarding mailbox.

A note of the name of any child referred to Children's Social Care, along with the referral type, should be listed on the Project Overview Form.

Referrals may be of one of three different types:

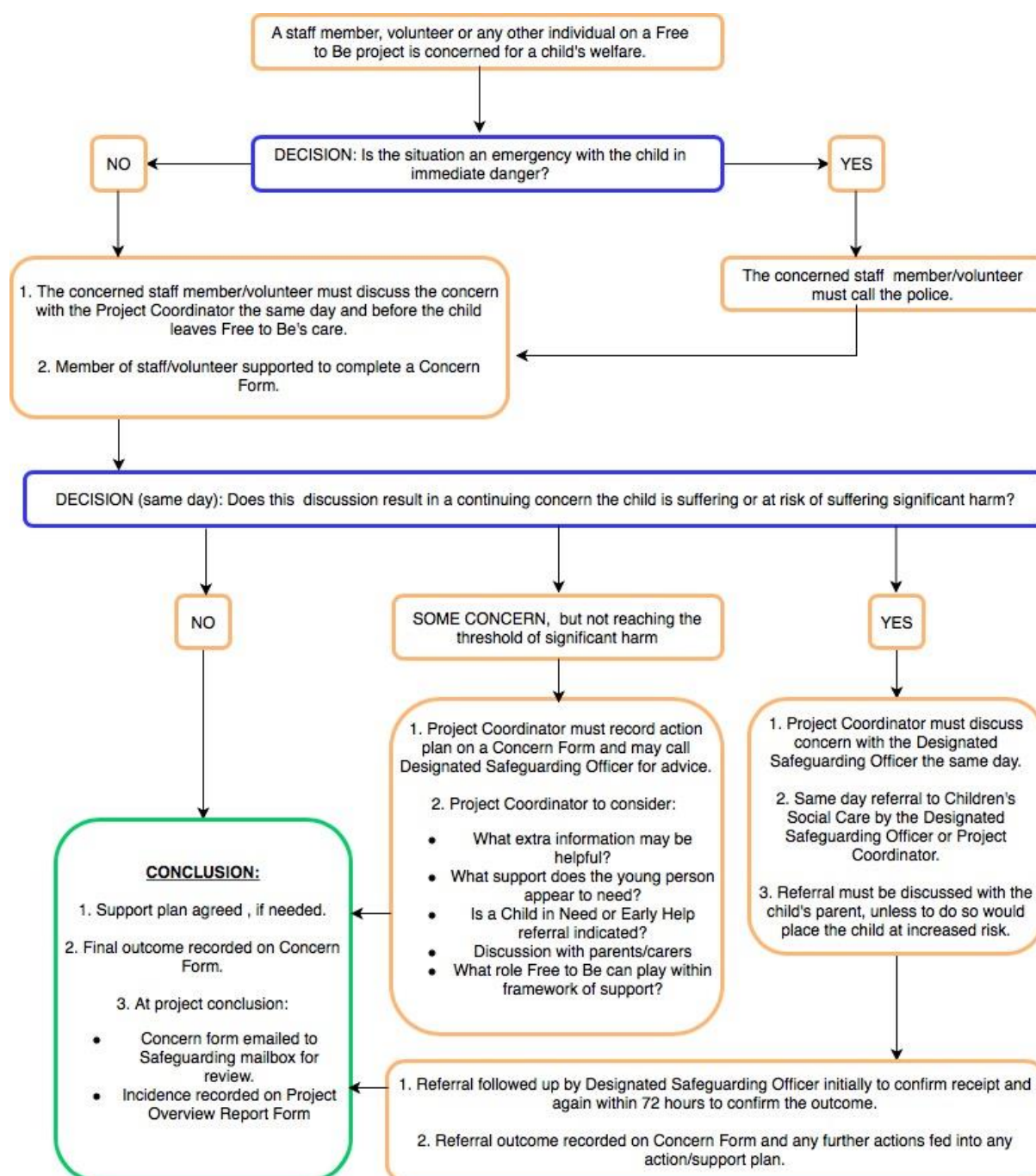
Child Protection (s47 of the Children Act): when a child is suspected to be suffering or at risk of suffering significant harm. Such referrals do not require parental consent although this should be sought as a matter of best practice unless to do so would place the child at risk of increased harm, in which case the advice of both the Designated Safeguarding Officer and Children's Social Care should be sought.

Child in Need (s17 of the Children Act): when a child is in need of support to achieve or maintain a reasonable level of health or development; or where health and development is likely to be significantly or further impaired without the provision of services; or where a child is disabled and

is not receiving necessary support. All referral for child in need support must be made with the agreement of the parent/carer ordinarily providing care to the child.

Early Help: where a child does not meet the threshold for statutory child in need support but where the family would benefit from ongoing guidance or family support. All referrals for Early Help must be made with the agreement of the parent/carer ordinarily providing care to the child.

Responding to concerns for a child's welfare – flowchart:



Supporting children who make a disclosure:

A 'disclosure' refers to a young person telling another individual about issues which concern or worry them at home, school or elsewhere. The issue disclosed could refer to a minor issue or to serious abuse or harm. In any situation where a child has found the courage to share their inner world in this way it is important their account is taken seriously and responded to both empathetically and professionally.

Free to Be staff, volunteers or other relevant individuals should do the following in response to any disclosure made by a Free to Be child:

- Listen actively and empathetically.
- Affirm that they have done the right thing in telling someone. (As Free to Be recognises children may have been told bad things will happen to them if they talk about the harm they are experiencing.)
- Avoid unnecessary exploratory questions. Questions should only be asked if necessary to understand the circumstances of the child's story. (Think about whether it is clear from the child's story What, Where, When, Who and How.)
- Never ask 'leading questions'. (Questions which suggest an answer.) If contextual questions are needed open questions should be employed using TED phrasing. (Tell me more; Explain; Describe.) e.g. "Can you tell me more about this?" or "Can you describe where this happened?" rather than "Did this happen in your house?"
- Never promise to keep information secret. (This is vital as information regarding any concern will need to be passed on. However, reassurance can be given that information will be managed carefully, only shared with those who need to know to help keep the child safe.)
- Make sure the young person knows what will happen next.

Should the Free to Be adult hearing the disclosure hold any level of concern for the young person's welfare upon conclusion of the disclosure, the issue should be discussed with the Project Coordinator as per the policy above.

Responding to marks/injuries, concerning behaviour or other observable concerns:

Rather than children actively disclosing harm, concerns may arise from observations whilst spending time with young people. Free to Be trains all volunteers/staff on potential indicators of harm. Potential indicators of harm may include:

- Unexplained bruises/burns/other injuries, or where the explanation does not match the injury.
- Talking about violence within the home.
- The young person seeming frightened of a parent or carer, or seeming afraid to go home.
- Arms and legs being kept covered by clothing in hot weather without alternative explanation.
- Talking about use of drugs or significant alcohol use at home.
- Inappropriate sexual behaviour for the child's age and developmental level. (Such as sexually touching other children or, dependent upon age, themselves. Initial concerns about potential sexualised behaviours should always be considered via use of the 'Brook Traffic Lights' tool.)
- Inappropriate knowledge about sex for the child's age.
- Pain or bleeding in the anal or genital area. Presence of a sexually transmitted infection.
- Fear of a particular person.
- Implying a need to keep secrets on behalf of or about an adult, or the home.
- Bed wetting or soiling, particularly when not disclosed in advance or associated with anxiety or fear.
- The parent or carer constantly criticising, insulting, putting down, threatening, or rejecting the child.
- Extremes in behaviour from aggressive to passive.
- Compulsive lying and stealing.
- The young person seeming highly anxious, with a lack of trust in adults.
- Eating hungrily or hardly at all; stealing or hoarding food.
- Rocking, sucking thumb or self-harming behaviour.

- Poor hygiene: matted hair, dirty skin, or ongoing body odour.
- Significantly inadequate clothing, especially if in combination with other indicators on this list.
- Untreated serious or persistent medical problems.
- Expressions that no-one looks after or cares for the young person.
- Significant changes in patterns of behaviour over time e.g. becoming more withdrawn or anxious over a sustained period.
- Young people presenting with new knowledge and interest in sex alongside increased levels of money, clothing or similar.
- Children going regularly missing from home or care placements.
- Children who consistently express strongly held values contrary to the British values of democracy, respect & tolerance, individual liberty, law (rule of) or promoting terrorist organisations.
- Talk of meeting new people, particularly non-related adults, whom they have met online.

Many potential indicators of harm may have ordinary explanations however Free to Be adults must be vigilant that incidences of harm or maltreatment are statistically higher within the population of children Free to Be supports than in the general population. Careful attention and reflection alongside an attitude of 'respectful professional curiosity' is essential in ensuring warning signs are recognised and managed appropriately.

Should staff members/volunteers or other adults on Free to Be projects note any of the above factors or make other observations which leave them concerned for the welfare of a child, they should do the following:

- Pay careful attention to the observation, internally logging what has been seen or said which has led to the concern.
- If necessary to understand the context of an otherwise unclear observation, ask one or two open questions focussed only on letting the child tell their story. For example "I've just noticed that bruise on your arm, what happened there?" Leading questions must not be asked.
- It is important young people do not feel 'grilled' or investigated' as this is not Free to Be's role. However, staff members/volunteers should aim to present as calm, interested, safe and responsive adults with whom young people can explore difficult subjects should they wish to.

In addition to the above indicators of potential harm, adults spending time alongside children on Free to Be projects may notice other areas with which children or their families need support or express difficulty. This could include but is not limited to parental or child mental or physical health; financial difficulties or material/food poverty; housing instability or inappropriateness; being victim of or involved in crime or gang culture; acting as a Young Carer; or difficulties in other settings such as in school or with peers. The above procedures relating to harm should be equally applied to concerns regarding potential need for support. Unmet need in any of the above areas should consequently lead to initiation of the 'concern' reporting process.

Recording information – Concern forms:

Relevant information relating to any concern about either harm or need must be recorded on a Concern form within 24 hours of the concern arising. The following principles apply:

- Children's own words and descriptions should be reported within the written record where possible.
- All recording must focus on the observed or reported facts of the situation, alongside any relevant context. Written records should not include personal opinion but may include reasoned professional judgement where this is clearly separated from the reporting of observations.
- When later recording concerns relating to bruising, injuries, or other marks, consideration should be given to use of sketching a simple 'body map' to identify size and location of any marks.
- At the outset of each Free to Be project, the Project Coordinator must make clear to all staff, volunteers and other supporting adults on the week where Concern forms are located and

the procedure for passing in completed Concern forms.

- Concern forms must be read by the receiving Project Coordinator as soon as possible upon receipt and always within 24 hours. The Coordinator must record their initial action plan in response upon the Concern form.
- When an action plan has concluded and any concern resolved, outcomes must be recorded on the Concern form by the responsible manager. (The Project Coordinator if the concern concludes within the timeframe of the project, or the Designated Safeguarding Officer if not.)
- All Concern forms must be scanned to the safeguarding mailbox for the Designated Safeguarding Officer's review and storage by the end of the project.

In order to support volunteers/staff members to record all relevant concerns, incidents and accidents during busy residential projects, coordinators must require residential group leaders to complete a 'daily report' sheet listing the number of accidents, incidents and concerns at the end of the day. The Coordinator/s and group leaders must then work together to ensure all forms indicated as being required by the daily logs are completed within 24 hours.

Support, supervision and structure on projects:

Free to Be prioritises effective safeguarding and support for children via the structure embedded within all projects. The Leadership Team must ensure project structures are designed to correspond to Free to Be's core operating principles which play a central role in helping children feel safe on projects and create a caring, welcoming, inclusive project atmosphere conducive to felt security and the reporting of concerns. The Leadership Team must also ensure projects are designed in accordance with Free to Be's 'Supporting & responding to children's behaviour'; 'Risk Managements Systems' and 'Health & Safety' policies which create a safe infrastructure within which risks to young people's health and wellbeing are managed.

A safeguarding noticeboard, displaying identity and contact details for the Designated Safeguarding Officer; information on whistleblowing policy; information on how to refer a child to their Local Authority; and a copy of the Safeguarding & Child Protection policy, must be on display on all projects unless it is not possible to do so. Where it is not possible to display the noticeboard (envisioned only to be on camping projects), the same information must be otherwise available to those attending.

In addition to safeguarding measures embedded in project structure, adults supporting young people on projects must be aware of the following support scenarios:

One to one or isolated situations: Providing care for young people, particularly on Free to Be's residential projects, necessarily involves spending very significant amounts of time alongside vulnerable young people. At times this will necessarily involve support in potentially sensitive situations such as supervising children getting changed at swimming pools, supervising showering arrangements and being in children's bedrooms to read bedtime stories.

At all times Free to Be staff, volunteers and other adults providing support must seek to avoid being alone in an isolated or unobservable situation with an individual child. Should this be unavoidable, the adult should let others know of the situation and take measures to reduce any isolation, for example leaving doors to rooms open.

Should any adult necessarily need to be alone with a group of children, for example whilst one group leader is reading a bedtime story and the other gets hot chocolate, this must be kept to as short a time as possible and control measures such as leaving room doors open or ajar should be adopted.

In no circumstances should any Free to Be adult ever be alone with any child whilst either the child or the adult is in any state of undress. Accordingly, any need to supervise changing arrangements must be undertaken by at least two adults.

Physical touch: Free to Be staff, volunteers and other supporting adults should be responsive,

emotionally available and nurturing to the children in Free to Be's care. Responding to children's expressed need for physical comfort or reassurance is an important component of this. Free to Be therefore adopts a 'positive physical touch policy' whereby supportive adults should respond physically to children's initiations of physical comfort. This means that in some circumstances limited and mindful physical touch may be appropriate. (For example a sideways hug in response to distress, an arm around the child's shoulder or a hand on their back to help them to calm down.) In all circumstances the following safeguards must always be adhered to:

- Adults should not initiate physical contact with children. Instead adults respond only to children's direct physical initiations or, should a child's emotional cues suggest this is sought, adults should ask before initiating a hug or other response.
- Positive physical touch must only occur in situations where more than one adult is present.
- Positive physical touch should seek to provide a sense of physical comfort without the need for prolonged contact. For example, a short hug could be followed by wrapping a blanket around a distressed child's shoulders.
- Positive physical touch should be proportionate e.g. a sideways hug rather than face to face.
- Free to Be adults must never touch a young person in any area that is normally covered by a swimming costume.
- No Free to Be adult should ever kiss a child, including by way of greeting.
- Adults should be mindful of a child's response to positive physical touch and remain alive to any risk of misinterpretation or other negative responses. In such situations adults must withdraw from contact immediately and calmly and consider whether recording the occurrence on an Incident form would be useful to create an independent record.

Physical intervention: Free to Be risk assess all young people referred to projects and must not accept referrals for young people assessed as likely to require physical intervention to keep them safe within the project. Nevertheless, as in any provision, for groups of young people, from time to time, situations may occur when Free to Be adults need to physically intervene with young people in order to keep them physically safe. Policy regarding this is detailed within the Supporting Children's Behaviour section of the Policy & Procedures Manual, however the minimum standards below apply at all times:

- In all circumstances any physical intervention must be the minimum necessary for the minimum duration in order to avert immediate risk to safety.
- Physical intervention must never be used for any reason other than immediate intervention in response to a direct risk to a young person's safety. It must never be used to manage or respond to behaviour.
- Prolonged physical restraint must never be used on any Free to Be project.
- Any incidence of any physical intervention must be recorded on an Incident Form which must then be managed as per Risk Management Systems policy.

Preventing extremism & radicalisation ('Prevent'):

Free to Be is committed to providing a secure environment for children, where they feel safe and are kept safe. Extremism or radicalisation of any form is never tolerated on Free to Be projects. To ensure this, Free to Be adopts the following measures to ensure children's resilience to extremism and radicalisation is built, and that any concerns regarding children experiencing harm via exposure to extremist views, are managed appropriately.

Extremism is defined as: vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Extremism also includes calls for death of members of the armed forces.

Radicalisation is defined as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

(Definitions taken from Prevent Duty guidance for England & Wales, 2015)

The effectiveness of Free to Be's approach to 'Prevent' will be reviewed every two years within the broader two yearly risk assessment and review process of Free to Be's wider safeguarding policies and procedures, and the effectiveness thereof.

Free to Be will build the resilience of children to radicalisation and extremism via ensuring all Free to Be projects support the identified core British values of democracy, respect and tolerance, individual liberty, and respect for the rule of law.

Any concerns regarding extremism or radicalisation, whether expressed by a child, a family member of a child, a Free to Be adult, or any other person connected to Free to Be should be managed via the same procedures as for any other safeguarding concern.

The Designated Safeguarding Officer must be informed of any concerns in relation to extremism, either directly by the individual reporting the concern, or by the Project Coordinator, if the concern has been initially referred to them. The Designated Safeguarding Officer must consider whether onward referral through the child or adult's local 'Channel procedure' is required. If the concern relates to a child, or a family member of a child, consideration must also be given as to whether this constitutes risk of significant harm, thereby necessitating onward referral to the child's home Social Care department.

Anti-Bullying statement & procedures:

Statement of Intent: Free to Be is committed to providing a warm, caring and safe environment for all children attending projects. Every child attending Free to Be has the right to be safe, feel safe and be treated with respect. Bullying of any kind is unacceptable, will not be tolerated, and must be responded to robustly by all staff members, volunteers and supporting adults.

Definition: Bullying is any deliberate, hurtful, upsetting, frightening or threatening behaviour by an individual or a group towards other people. It is repeated over a period of time and is defined as happening 'Several Times on Purpose'. Bullying can relate to race, gender, sexual orientation, disability, appearance or any other characteristic. Bullying can include:

- Being intentionally unfriendly or persistently excluding.
- Name-calling, sarcasm, spreading rumours, threats, making rude remarks, ridiculing.
- Physical pushing, hitting or other forms of violence or inappropriate physical interaction.
- Online/cyber bullying including posting unwanted images online.

Prevention: Free to Be aims to reduce the risk of bullying occurring via the following measures:

- The Free to Be trustees and Leadership Team must ensure projects are structured in line with Free to Be's core operating principles which are designed to create a positive, supportive project atmosphere aimed at both minimising opportunities for bullying and increasing young people's confidence to report any concerns.
- All staff members, volunteers and other supporting adults must receive training on awareness of and responses to bullying prior to attending any Free to Be project where children may be present.
- When children first arrive on a project the Project Coordinator must explain the project rules to all young people.
- The project rules must include clarity that bullying of any form, making specific reference to sexism, racism, homophobia or any other upsetting comments, is unacceptable and will result in consequences.

Procedures for responding to bullying: The following procedure must be followed should any young person, or any adult on their behalf, report bullying to any adult on the project:

- The adult whom the concern is reported to must reassure the child they have done the right thing in reporting it, that bullying is unacceptable, and that the matter will be managed sensitively.
- The adult should consider whether it may be appropriate to explore with the young person what they feel might help.
- All incidences of bullying must be reported to the Project Coordinator the same day and be recorded on an Incident Form (which may refer to a pattern of behaviour rather or a one off event) within the same timeframe.

- The Project Coordinator and any relevant adult in a role directly supporting the child (For example, the child's Group Leaders on a residential project.) should discuss the issue and agree an action plan. The action plan must be recorded on the Incident Form.
- The action plan must consider consequences for any young person bullying another young person as one part of the response.
- Other steps to be considered should include: how to assist the victim in re-integrating into the group; increasing supervision levels; active steps to alter any contributing group dynamic; informing parents and what role they may play in support; the potential for supported reconciliation vs the need to keep the young people separated.
- The action plan must be reviewed within 24 hours and amended as necessary. Any change in the action plan or conclusion of the incident must be recorded on the Incident Form.
- If the bullying has not ceased after the first 24 hour period the review of the action plan must include the Project Coordinator speaking directly to the young person carrying out bullying if this has not already been done. Attempts must be made, and support given, to help the young person understand and change his/her/their behaviour. The Coordinator must initially speak to the young people involved separately.
- The action plan must continue to be reviewed and new approaches put in place until bullying is no longer taking place. After the incident has been investigated and dealt with, the situation must be monitored to ensure repeated bullying does not take place.
- In serious cases parents should be informed.

E-safety, including social media and mobile phones:

Free to Be recognises that, digital media and communications are a key part of many children and young people's lives. As children's online and offline lives become more enmeshed, Free to Be adopts the following measures relating to E-safety:

- Children attending Free to Be residential projects must not bring mobile phones, tablets, games consoles or similar communications equipment. This information must be communicated in advance to parents/carers and an alternative, supervised phone line provided on each project to allow children to phone home. This is an essential control measure for residential projects in preventing online bullying, sexting, the taking of inappropriate images and other risk factors on Free to Be projects.
- For Free to Be non-residential projects, use of mobile phones, tablets and the internet is strongly discouraged, unless it forms part of the activity that children are involved in. Any usage must be supervised.
- Children must not be permitted to use volunteers' phones, tablets or other technology to access the internet or make phone calls, except in supervised situations approved by the Project Coordinator.
- In no situation should any Free to Be staff member, volunteer or supporting adult allow or encourage access to age inappropriate content of any kind.
- Staff members, volunteers and other supporting adults must at all times adhere to the relevant clauses of the Code of Conduct that relate to e-safety. They must not: befriend young people on social media; take or store photographs or other recordings of children on their personal devices; swap contact details or otherwise contact/connect with children,
- Should a staff member, volunteer or any other adult be contacted by a young person outside of a project, in the first instance they should clearly but sensitively explain that the organisation does not allow them to respond or to maintain contact. The adult should instead provide the young person with Free to Be's hello@freetobekids.org.uk contact email address should the young person wish to contact the organisation. The adult must forward a copy of the child's communication to the Free to Be Leadership Team the same day. Following this initial response, adults should not respond to any further attempts at contact from the child but must continue to pass information regarding any attempted contact to the Free to Be Leadership Team the same day.
- All Free to Be staff, volunteers and supporting adults must be provided with basic training or information regarding e-safety and online behaviour prior to attending any project where children may be present.

- E-safety concerns must be handled in the same way as any other concern regarding a young person's welfare and reported the Project Coordinator, (or the Designated Safeguarding Lead, should concerns arise outside of a Free to Be project), within the above time scales.

For clarity, the above policy applies equally to Young Leaders both in the sense that as volunteers supporting children they must abide by the same safeguarding structures as adult volunteers. And that as legally still children, adult volunteers must also not befriend them on social media; take or store photographs or other media of Young Leaders; or exchange contact details with Young Leaders. Where parental consent has been provided to do so Project Coordinators of residential projects may share a Young Leader's mobile phone number, but not other contact information, with the adult Group Leaders attached to the same group as the Young Leader. This information is shared for the purpose of supporting the Young Leader in their role for the duration of the residential project. Group Leaders and Young Leaders must be supported by the Project Coordinator to delete each other's numbers at the conclusion of the project.

Confidentiality of children's information:

Free to Be necessarily handles large amounts of personal and sensitive data about the children it supports.

All staff members, volunteers and other supporting adults must be made aware of, and must at all times adhere to, Free to Be's confidentiality requirements in respect of this data as detailed within Free to Be's data protection policy. This includes the core principle that only information necessary to the safe fulfilment of a staff member, volunteer or other adult's role will be disclosed to that individual.

Project Coordinators must ensure all adults on the project understand that Free to Be's confidentiality and data protection policies apply to all information about a child, including oral information children may share themselves during the course of the project. Project Coordinators must ensure that all adults understand that this policy does not mean information relating to a concern for welfare should not be shared but does mean such information should only be shared with those defined within the above procedures for reporting concerns.

Concerns relating to Free to Be or a Free to Be staff member, volunteer or other adult - Whistleblowing:

Free to Be aims to ensure all staff, volunteers, parents, children or other individuals feel safe to raise any allegations, concerns or complaints they may hold regarding Free to Be or any individual representing Free to Be.

A complaint: is where an individual is unhappy regarding any aspect of the service they have received, or experiences within, Free to Be. The Grievances & Complaints policy should be followed, which is contained within the Recruitment & People Management section of this document. This should be read in conjunction with the Code of Conduct and Disciplinary policy, located within the same section.

A concern: is where an individual is worried regarding any aspect of Free to Be's service.

An allegation: is where an individual is raising specific information relating to the organisation or an individual within it, having committed or failed to carry out actions which placed a young person at risk of harm; committed a criminal act; or poses a risk to young people or other vulnerable groups. Concerns and allegations must be managed within Free to Be's whistleblowing policy.

Free to Be adopts the following measures in order to ensure concerns and allegations can safely be raised in a confidential manner; are taken seriously; are responded to appropriately; and that the individual reporting the concern or allegation is not mistreated, discriminated against or otherwise treated differently as a result of sharing information through the procedures below:

- All concerns raised via this whistleblowing process must be treated confidentially. This includes the reporting individual's name not being disclosed to the subject of the concern/allegation by Free to Be.
- In the first instance any concern or allegation should be raised with the Project Coordinator.
- Should the concern relate to the Project Coordinator or relate to concerns regarding safeguarding practice the concern should be raised with the Designated Safeguarding Officer.
- Should the concern relate to the Designated Safeguarding Officer or their practice, the concern should be raised with any other member of the Leadership Team.
- As a final recourse, concerns may be raised directly with the Chair of trustees should other options not be appropriate.
- The individual receiving the concern will make a record of the concerns or allegations raised and follow the Free to Be serious allegations policy or concerns policies as appropriate.
- Individuals raising concerns must never discuss concerns in front of young people or their families.
- Information regarding the process of Free to Be's handling of the concern must be fed back to the individual raising it by the relevant manager.
- Should the individual who first raised the concern feel unsafe practice; insufficient action to keep children safe; or a criminal act has taken place and has not been safely responded to via Free to Be's initial response, the individual should report the concern to the relevant authority. The relevant authority is the Local Authority Designated Officer in the area within which Free to Be's registered address is located. If a young person is felt to be suffering or at risk of suffering significant harm, the relevant authority will also be Children's Social Care in the area within which the child lives. If the issue relates to a criminal offence, the relevant authority will also be the Police.
- The individual reporting the concern, whether reporting it internally or subsequently externally, will not be treated differently or otherwise disadvantaged as a result of raising the concern providing the above procedures have been followed.
- In the event of allegations subsequently determined externally to have been made maliciously, Free to Be reserves the right to consider whether this breaches the Code of Conduct and consequently whether disciplinary procedures should be instigated.

Supporting Children's Behaviour

Context and organisational approach

Free to Be's approach to responding to children's behaviour holds in mind the following key points:

- That the children it supports come from a range of disadvantaged backgrounds and many will have had significant adverse life experiences, which are likely to present in their behaviour.
- That unfamiliar environments, new relationships and similar elements of stretch and challenge are likely to amplify children's existing coping strategies to feel safe, in control or deal with perceived rejection or shame.
- That it is developmentally normal for children to behave in ways which demonstrate their feelings and frustration when they are upset.
- That all behaviour is a presentation of underlying needs, feelings and thought processes and that the best way to support children with negative behaviour is by understanding and helping to address the feelings and thought chains that they are struggling with.
- That, for the staff and volunteers involved, experiencing and responding to more challenging elements of children's behaviour can have an emotional impact and therefore space to process and time for self-care is vital in equipping and supporting staff and volunteers to maintain the resilience and empathy required to provide children with the best support.

Finding the balance between managing and exploring challenging behaviour:

Free to Be recognises that, in order to benefit as much as possible from its projects, both children and the adults working with them must feel safe and supported. Therefore, it is essential that clear rules and boundaries around acceptable behaviour are set and followed, and that when rules are broken or behaviour falls short of what is acceptable this is addressed robustly.

Free to Be also recognises that instances of challenging behaviour are likely on its projects and that, when handled well, they can provide valuable learning experiences, both for children, in equipping them to manage adversity more constructively, and for the adults working alongside them, to better understand their thoughts and feelings.

The Leadership Team and Project Coordinators should strive to find a balance on Free to Be projects, between ensuring children feel safe and contained and that instances of unacceptable behaviour are clearly marked and dealt with, and providing some space and freedom for children to learn from and take responsibility for their own actions. This balance should form a key consideration within the organisation's design of new projects and systems, training and recruitment of staff and volunteers and approach to managing risk, including in the following areas:

Expectations for Staff and Volunteers when interacting with children

All staff and volunteers are trained and expected to use positive strategies for handling challenging behaviour, by helping children find solutions in ways which are appropriate for their ages and stages of development. All staff and volunteers are expected to:

- Acknowledge children's positive and considerate behaviour, such as being adventurous, kind, brave, empathetic and willing to share.
- Treat all children with positive regard, supporting them to develop a sense of belonging, so that they feel valued, welcome and held in mind by the adults working alongside them.
- Avoid falling into dynamics in which children receive adult attention only in response to poor behaviour.

- Use the 'wondering aloud' technique to discuss children's dilemmas with other adults in their presence, allowing the child to listen and think without feeling pressured to respond or to feel embarrassed at being the direct focus of concern.
- Recognise that children may require help in understanding the range of feelings they experience and supporting by naming them and helping children to express them.
- Support children to empathise with others and consider how their actions may impact on others' feelings.
- Understand that, for some children, the same behavioural issues may present repeatedly— that it is only through repeated positive experiences of problem solving, supported by patient adults and clear boundaries, that a child develops the ability to navigate issues independently.
- Use positive touch in a mindful and child-led way and in line with Free to Be's Safeguarding Policy.

Structure:

- Ratios of adults to children on a project should never drop below 1:3 and, where possible, work should take place in small groups, to allow for problems to be picked up on and supported at the earliest possible stage and to ensure staff and volunteers have sufficient time and space to work through issues with children when they arise.
- Predictable routines and project structures with clear beginnings and endings are important, since these help children to know what to expect and feel safe. Structures and routines should be explained to and reinforced with children throughout any project.
- The Leadership Team and Project Coordinators should apply careful thought to the nature and amount of un-facilitated 'dead time' within projects, ensuring the need for children to navigate new and challenging social situations in an un-scaffolded way is matched to their capacity to do so. When children are in unfamiliar or more socially complex contexts, they should receive more support to engage with others in ways which feel positive and safe.
- When thinking about and managing dynamics, the Leadership Team and Project Coordinators must take into account the best ways to minimise difficult interactions between children, including by designing project timetables with careful consideration of groupings and challenging times of day.

Clear rules:

- Rules should focus on ensuring everyone involved is kept safe and has a positive experience whilst on Free to Be projects. All rules should be purposeful and have clear reasoning behind them which relates back to at least one of these two focuses.
- Rules should always be phrased in ways which are simple and easy for children to understand. Where appropriate and possible, children should be encouraged to play a part in creating and agreeing project rules.
- Time must be taken at the beginning of any project, to ensure children, staff and volunteers are familiar with all rules and have the chance to ask any questions about them.
- When rules are broken, volunteers and staff must work to help children and young people understand the outcomes of their actions and support them in making amends and thinking about alternative courses of action.

Responding and repairing when things go wrong:

In handling challenging situations, staff and volunteers must always try to remain calm, calling on others for support or swapping in and out if they are struggling to manage on their own. The following steps should be taken to first de-escalate and then resolve issues:

1. If the situation is not safe, any danger should be removed. Staff and volunteers must continue to monitor any risk within a situation whilst dealing with it and, prioritise managing any danger as it arises.
2. Before any work is done on resolving the issue, time should be taken to calm the child or children involved. In altercations between children, it is important to recognise that angry children require just as much support as those who have been hurt by their behaviour. Where it is likely to be helpful in calming them, children should be separated from each other

and/or the rest of the group. Staff and volunteers must recognise that children may struggle to regulate on their own, and may require soothing support and time to overcome their body's physiological reactions to intense emotions. A calm voice; non-threatening body posture and ongoing attempts to reassure and engage the child, should be used to help them become better able to manage their feelings. Under no circumstances should a child's anger be met with more anger, threats, or attempts to 'shout them down'.

3. Once the children involved are calm and able to reflect, time must be taken to discuss what has happened, either individually or as a group and taking care to ensure discussion is pitched at the right level for the children's understanding. Such discussions should always take place in a way which ensures children experience feeling listened to; a differentiation between the behaviour that has taken place (which may be unacceptable, wrong or bad) and the children themselves (whose strengths, abilities and positive potential should be emphasised) and a clear message about what needs to happen to make amends for the incident and then move on from it.
4. Repairing and resolving are key concepts. Once an issue has been de-escalated, all sides heard and understood, there must be an 'ending' to the response process which should as far as possible aim to provide a resolution of the difficulty. This should involve apologies where appropriate.
5. Some form of 'consequence' will usually be appropriate to help mark the resolution/ending phase. This may be a simple warning or agreement about what should happen should the situation re-arise. Or could involve repairing damage done, a small amount of time out, writing an apology note, or other simple task. The child speaking with the Project Coordinator is often an effective early stage sanction. Coordinators may determine more impactful consequences, such as missing an activity, are required, but other adults should not threaten this. Care should always be taken to tailor any sanctions, ensuring they are appropriate reparative measures for the individual incident and pitched to the emotional capacity of the individual children involved.
6. Under no circumstances may physical punishment be used or threatened, (even as a joke). Physical restraint, such as holding a child, may only be used to prevent physical injury to children or adults and/or serious damage to property and if there is no other safe alternative (see the physical intervention section of this policy for further information) – it must never be used as a punishment or sanction.
7. Staff and volunteers must never use techniques intended to single out and shame or humiliate individual children as a punishment.
8. Once reparation for an incident has taken place, the intention to move on from the incident should be made clear to all children and young people involved and staff and volunteers should support those involved to 'begin a clean sheet'.

Involving parents:

In some situations, it may be helpful to involve parents in conversations about children's behaviour. Project Coordinators must think carefully about when and how to do this, ensuring that: they do not expose the child to potentially harmful or counterproductive punitive measures from parents; that their communication with parents is always constructive, emphasizing the child's behaviour within the context of the wider project, their strengths and positive contributions; that follow up takes place afterwards to reassure parents that incidents have been resolved.

Sending children home:

In rare circumstances, Coordinators may feel it is unsafe to keep a child or young person on a Free to Be project. If this is the case, they should refer to the Managing Risks around Children and Young People section of the Risk Management Policy, within the Policy & Procedures Manual. Only Project Coordinators, in conjunction with the Leadership Team, may make this decision. Other staff/volunteers must never threaten or suggest that a child may be sent home, but should instead flag any serious concerns around unsafe behaviour to the Project Coordinator as soon as possible.

Sending home should never be used or threatened as a punishment. It is only ever used as a last resort measure to ensure children's safety.

Bullying

If a child or young person bullies another child or children, the Anti-Bullying Policy, within the Safeguarding & Child Protection section of the Policy & Procedures Manual should be followed.

Physical Intervention

Free to Be is unable to take referrals for children who require physical restraint on a regular basis in order to stay safe. Additionally, the set-up and structure of Free to Be projects are designed to allow volunteers to manage children safely without needing to regularly physically restrain.

However, in rare circumstances, it may be necessary to intervene physically **as a last resort or an emergency measure and only** in order to prevent a child or young person from:

- Seriously harming themselves
- Seriously harming another person
- Seriously damaging property

Under no circumstances must physical intervention of any form be used to force compliance with staff or volunteer instructions if there is no immediate risk to people or property.

In the rare circumstances that physical intervention is necessary, it must always be:

- For the shortest time necessary and only until the risk of harm is removed
- With the minimal force applied
- Executed in the least invasive way possible
- Managed calmly by the volunteers involved - with clear communication to the child of what is happening and why and clear attempts to support them to calm down

Unless the emergency situation is such that there is no time to attempt other de-escalation strategies, staff and volunteers must always attempt other possible strategies to calm the situation first, e.g. stepping between two fighting children; firm but calm instructions to stop; guiding other children away; providing space where it is safe to do so.

Every effort should be made to ensure the presence of other staff or volunteers when physical interventions take place, to ensure there is assistance and witnesses on hand.

Recording Instances of physical intervention

Any incident of physical intervention must be recorded as soon as possible afterwards on an Incident Form, which should be reviewed by the Project Coordinator. Project Coordinators must log all instances of physical intervention on a project on the Project Overview Report, submitted to the Leadership Team after the project is completed.

Serious incidents

If there is a serious behaviour incident, in which an individual is significantly harmed or there is a risk of an individual being significantly harmed, the Serious Incident Procedure within the Risk Management Policy should be followed.