



Ten Garden

Safeguarding Policy

Address: 28 Regency Square, Brighton BN1 2FH



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Safeguarding Policy

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TERMINOLOGY

Child/Children include everyone under the age of 18

TG Ten Garden

All adults working with children is the term used in this policy to describe all adults (everyone) who will come into contact with under-18's during our programmes. This list is not exhaustive but will include: all staff, management staff, transport drivers, host families

Safeguarding and promoting the welfare of children is:

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

Child Protection is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Duty of Care: Everyone is required to take reasonable care in any situation in which harm to someone else can be foreseen.

Higher Duty of Care: The standard of care expected with increased experience and specialist expertise where, through training or experience, one may be expected to visualise more clearly the results of one's actions in one's area/s of specialism.

Negligence: Acts or omissions by someone with a duty of care in which this is breached by falling below the standard of care required in the circumstances to protect others from unreasonable risk of harm.

DSL - designated safeguarding lead

LADO - Local Authority Designated Officer

DBS Disclosure and Barring Service



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1. Introduction

Ten Garden Education is committed to the definition herein of safeguarding and promoting the welfare of children. This policy is written with regard to the following documents:

- 'Keeping Children Safe in Education' (19 September 2018)
- 'Working Together to Safeguard Children' (1 August 2018)
- 'What to Do If You're Worried a Child Is Being Abused' (26 March 2015)
- The Children Acts 1989 and 2004
- The Education Act 2002
- Counter Terrorism and Security Act 2015
- The Prevent Strategy (June 2015)

We believe that safeguarding is the individual and collective responsibility of everyone working in the company. Our policy recognises that the welfare and interests of children are paramount in all circumstances and is committed to ensuring its safeguarding practices exceed statutory requirements and the requirements of all our various accrediting bodies.

2. Application of this Policy

This policy and procedures are widely promoted and are mandatory for everyone involved in Ten Garden: for TG staff, host family hosts and their families, TG Guardianship pupils and their parents and anyone else who comes into contact with a TG pupil. It details what TG thinks about safeguarding, and what we do to keep children safe.

TG is committed to safeguarding the welfare of every Guardianship pupil in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after under 18s safely.

It is essential that the TG Safeguarding Policy and Guidance is known to all adults in the host family host's household, so host family hosts must take time to share this with all members of their household aged 16+.

Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

3. Contact

Both the DSL (Kiki Zeng 07885 278366) and Deputy DSL (Celia Huang 07421 261159) of TG are contactable on their emergency mobiles 24 hours a day, 7 days a week. All host families, students, parents and schools – where relevant – are given these numbers and can call to raise any issues or concerns relating to a student.

4. Ten Garden Safeguarding Principles

We will seek to safeguarding children and young people by:

- valuing, listening to and respecting them;
- adopting child protection guidelines through procedures and a code of conduct for staff, host family hosts and their families;
- promoting and prioritising the safety and wellbeing of children and young people;
- recruiting staff and host family hosts safely, ensuring all necessary checks are made, preventing the employment/deployment of unsuitable individuals;
- sharing information about child protection and good practice with TG Guardianship



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- pupils, parents, staff, host family hosts and their families;
- providing effective management for TG staff and host family hosts through supervision, support and training;
 - providing a safe and secure environment for all pupils;
 - ensuring all children are safe and secure and protected from harm;
 - ensuring that all TG Guardianship pupils know who to turn to for help, advice or support, and have access to 24 hour support;
 - ensuring Designated Safeguarding Lead who has overall responsibility for the safeguarding and welfare of all TG Guardianship pupils;
 - ensuring that everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate training to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people;
 - ensuring that all staff and host family hosts follow TG policies and procedures relating to safeguarding and welfare and are aware of who in TG is responsible for safeguarding;
 - ensuring appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern;
 - ensuring that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

5. Ten Garden staff role and responsibilities

TG all staff have a responsibility for Safeguarding no matter what their role. These are outlined clearly in Part One of Keeping Children Safe in Education 2018.

Designated Safeguarding Lead (DSL) – Kiki Zeng (Director)

- who has overall responsibility for the implementation of the safeguarding policy and will be involved with any major decisions relating to safeguarding and child protection
- who trained in Child Protection to the appropriate level for this position.
- who linked with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- who looks after day to day welfare and safeguarding matters, placement of TG Guardianship pupil with host family hosts, induction and recording systems.

6. Implementing the TG Safeguarding Policy

Training and awareness

- TG staff – Child Protection training for everyone at Level 1
- TG host family hosts – Online training at Level 1; face-to-face discussions at the initial and repeat home visits;
- Continuing training offered as necessary to update



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Induction

- New TG staff and host family hosts have safeguarding procedures and their responsibilities included in their induction before they start to have contact with children.

Monitoring and supervision

- TG actively monitors the use and application of the procedures. TG host family hosts are also asked about safeguarding issues and awareness when discussing their progress and reviewing their work.

Recording keeping

- All concerns, discussions and decisions made and the reasons for those decisions should be recorded. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead.

7. Monitoring and Review

When: The policy will be reviewed a year after development and then every year, or in the following circumstances:

How: Ten Garden Designated Safeguarding Lead will monitor updates and inform Ten Garden Senior Managers regarding Best Practice. Feedback is collected from students and staff and this will be collated, discussed and implemented.

By Whom: The Ten Garden Designated Safeguarding Lead and Deputy DSL will be responsible for this process.



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SP1 – TG Child Protection Policy and Procedure

Date reviewed: 04 Mar 2019

Next reviewed date: 01 Mar 2020

Introduction:

Ten Garden is committed to safeguarding the welfare of TG Guardianship pupils and has developed this Child Protection Policy and Procedure to support host family hosts and staff members in putting into practice this commitment.

This policy establishes the roles and responsibilities of everyone who works for Ten Garden in relation to the protection of children and young people with whom their work brings them into contact. In the context of child protection, children and young persons refers to anyone under 18 years of age. It is the responsibility of everyone at Ten Garden to promote the protection of children and young people. In following this policy, staff are always expected to maintain a sense of proportion, apply common sense to situations and protect the child's welfare as priority. This policy is based on, and reflects, the principles of both UK legislation and guidance and other relevant Ten Garden policies and procedures. The approach has been developed in such a way as to be consistent with 'Best Practice' within the field of child protection.

The welfare of the child or young person is the paramount consideration. All children and young people, regardless of age, disability, gender, racial or ethnic origin, religious belief and sexual identity have a right to protection from harm or abuse.

It is also the duty of Ten Garden to ensure that persons are not placed in situations where abuse might be alleged. It is not intended that the policy should restrict staff from normal ways of working, but Host family Hosts and Members of Staff always need to consider how an action or activity may be perceived as opposed to how it is intended.

Principle and Good Practices

Ten Garden undertakes to:

- treat children and young people with care, respect and dignity
- recognise that those working for Ten Garden will be perceived by children and young people as trusted representatives of Ten Garden
- ensure communication with children and young people is open and clear
- assess the risks to children of its activities

Ten Garden Responsibilities

Kiki Zeng (Director) is the designated Child Protection Officer and has responsibility for implementing the Ten Garden Child Protection Policy. Appropriate training has been undertaken. The Child Protection Officer is responsible for reporting any allegations of child abuse that occur.

Aims

- Ten Garden considers it the duty of Host family Hosts and Members of Staff to protect children and young people who they come into contact with from abuse. This is part of our safeguarding children procedure.
- All host family hosts and adults in the host family household must understand their responsibilities in being alert to the signs of abuse and responsibility for referring any



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concerns to the designated senior person responsible for child protection.

- All host family hosts and adults in the host family household must understand the responsibility placed on Ten Garden for child protection.
- Not all concerns about children or young people relate to abuse, there may well be other explanations. It is important to keep an open mind and consider what you know about the child and their circumstances.
- If you are worried, it is not your responsibility to investigate and decide if it is abuse. It is your responsibility to act on your concerns and do something about it.

Definition of Abuse

The 1989 Children Act recognises four categories of abuse:

- **Physical Abuse** – actual or likely physical injury to a child, or failure to prevent physical injury.
- **Sexual Abuse** – actual or likely sexual exploitation of a child or adolescent. The child may be dependent or developmentally immature.
- **Emotional Abuse** – severe or persistent emotional ill treatment or rejection likely to cause adverse effect on the emotional and behavioural development of a child. All abuse involves some emotional ill treatment.
- **Neglect** – the persistent or severe neglect of a child, or the failure to protect a child from exposure to any kind of danger, resulting in the significant impairment of a child's health or development, including non- organic failure to thrive.

Historical Abuse

There may be occasions when a child will disclose abuse (either sexual or physical) which occurred in the past. This information needs to be treated in exactly the same way as a disclosure of current child abuse. The reason for this is that the abuser may still represent a risk to children now.

Confidentiality and Appropriate Disclosure of Information

Confidentiality is crucial to all our relationships, but the welfare of the child is paramount. The law does not allow anyone to keep concerns relating to abuse to themselves. Therefore, confidentiality may not be maintained if the withholding of information will prejudice the welfare of the child.

All information that has been collected on any child will be kept locked and secure and access will be limited to the appropriate staff, management and relevant agencies.

In the event of an investigation it is essential that no information on child protection concerns relating to a child are disclosed inappropriately. Any such leaks could have serious consequences for both the child concerned and any investigation.

Whilst parents / carers have the right to see any records kept on their child, this might not always be appropriate, and should not put the child or yourself at risk.

It is very important that only those who need to know (the designated Safeguarding lead at TG), actually know, to avoid rumour and gossip that could affect the child or parent/carer.



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Recognising Abuse

Recognising abuse is one of the first steps in protecting children and young people. There could be signs or behaviour that make you feel concerned. All Host family Hosts and Members of Staff should be alert to the following types of behaviour in the children:

- becoming excessively aggressive, withdrawn or clingy
- seeming to be keeping a secret
- personality changes – becoming insecure
- unreasonable fear of certain people or places
- acting out in an inappropriate way perhaps with adults, other children, toys or objects
- inconsistent explanations of bruising, injuries or burns
- sexually explicit language or actions

Child Sexual Exploitation (CSE)

CSE is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or don't take part in education.

Female Genital Mutilation (FGM)

FGM is illegal in the UK and there is a legal duty to report if you know it has happened to an under 18.

What to do if a child makes a disclosure

Ten Garden is committed to ensuring that it meets its responsibilities in respect of child protection by treating any allegation seriously and sensitively.

- Stay calm
- Listen to what the child/young person is actually saying
- Reassure them that they have done the right thing by telling you
- Do not promise the child that this can be kept secret, as subsequent disclosure could then lead to the child feeling betrayed. Explain that you are obliged to inform other people
- Reassure the child that the people who will be sensitive to their needs and will be looking to help protect them. Inform them that it is not in their interests to keep the disclosure confidential and it will have to be passed on to the appropriate agencies.



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- Make a note of any conversation with the child, trying to make these as detailed as possible, including when and where the conversations took place. Draw a diagram, if appropriate, to show the position of any bruises or marks the child or young person shows you, trying to indicate the size, shape and colour.
- Record as soon as possible and use the **actual words** used by the child.
- Keep all record factual. Be aware of not making assumptions or interpretation of what the child/young person is telling you. Store all record securely.
- **Do not interrogate** the child, or push for more information. Ensure that any questions asked are open, not leading closed questions. Do not ask the child/young person to repeat what they have told you, for another person. Record accurately.
- Discuss your concerns with the Ten Garden Designated Safeguarding Lead (Kiki Zeng) who will report this information to an appropriate agency (the Local Authority Designated Officer - LADO).
- The person whom the disclosure was made should ensure that the child who has disclosed the information is informed about what will happen next, so they can be reassured about what to expect.
- You may report your concerns directly to your local LADO if you are not satisfied with the response from TG. You will find contact details for your local Children's Social Care Referral and Assessment Team online. The details will be on your Local Council website. Alternatively, contact the Ten Garden Child Protection Officer who will provide you with relevant contact details.

Allegations against under 18s

Under 18s facing an accusation of child abuse will need additional support, especially as their parents will be overseas.

What to do if Abuse is Suspected

- The Host family Host or Member of Staff should keep monitoring the child's behaviour, making a note of any particular concerns (when, where and what happened).
- Discuss concerns with the Ten Garden Child Protection Officer.
- You should remember that if abuse is taking place, it is often not the parents but other family members or friends who are causing it. Parents are often the last to know.
- Any member of staff can contact the relevant agency to discuss any concerns they have and seek guidance before actually reporting any child protection issues. It is appropriate to seek support from the Ten Garden Child Protection Officer, as to how to deal with situations and confirm appropriate action to take.
- If you are still concerned about the welfare of the child/young person, this information must be passed on to the appropriate agency. It is important to remember that if you report concerns, you are not reporting the parents/carers – you are reporting to protect the welfare of the child.
- If appropriate, inform parents/carers that you are going to report your suspicions or concerns. This might not always be possible and should not put the child or yourself at risk. When you report an incident, the duty officer will ask you if the parent/carer has been informed. If they haven't, they will want to know the reasons why.
- If your local Children's Social Care Referral and Assessment Team (Social Services) has been contacted, they should let you know that they are responding to what you have told them. It is unlikely that you will be told what action has been taken unless it has implications for the scheme. If you have not heard from the Referral and Assessment Team, it may be appropriate to contact them to ensure that the details you gave them have been taken into consideration and acted upon.



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If You Suspect a Host family Host, Person within the Host family or member of TG Staff of Abuse or Inappropriate Behaviour

If it appears that any of the above has:

- behaved in a way that has harmed a child, or may have harmed a child, or
- possibly committed a criminal offence against or related to a child, or
- behaved in an inappropriate way towards a child which may indicate that he or she is unsuitable to work with children

Then these procedures must be followed:

- record your concerns and report them to the Director
- the Director will take steps to ensure that particular person is not left in sole charge of any child
- the Ten Garden Child Protection Officer will contact the Local Authority Designated Officer (LADO) to ask for advice and how to proceed and to give details of the concern
- TG will then follow the LADO's advice on how to deal with allegations against staff
- While support will be offered to the staff member involved, Ten Garden staff will ensure that the agencies concerned are given all assistance in pursuing any investigation

Support to Host family hosts and Staff

Ten Garden will fully support all Host family Hosts and Members of Staff in following this procedure. Following an allegation or investigation, Host family Hosts and Members of Staff can talk to the Child Protection Officer and any of the appropriate agencies detailed on the end of this Policy.

Recruitment of Host family hosts and Staff

We acknowledge that paedophiles and those that pose a threat to children may be attracted to employment that allows them access to children and young people. As part of the TG Safeguarding Policy, we will ensure that people working with the children are safe to do so. Our safe recruitment procedures are detailed in SP2&2a – TG Safer Recruitment Policy and Procedure for Host family Host and Staff.

Obligation to Report

TG must refer details to the Disclosure and Barring Service (DBS) when an alleged person has resigned or they have been dismissed because they have harmed or could harm children or vulnerable adults. The information must be referred to the DBS as soon as it becomes known.

Implementation and Monitoring

- Ten Garden will appoint a person with responsibility for child protection.
- This person will receive report from Host family hosts or Staff of any occasions when there are concerns or issues of Child Protection.
- Ten Garden will review this policy annually to ensure is being implemented. Appropriate action will be taken if deemed necessary, through consultation with the agencies referred to below.



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Further Information

For information about all aspects of Child Protection, including more advice on what to do if you are worried about a child, visit: www.nspcc.org.uk (National Association for the Prevention of Cruelty to Children). They provide a free 24 hour helpline where you can discuss your concerns with a counsellor. You can call the NSPCC on 0808 800 5000 or email: help@nspcc.org.uk
[The East Sussex Safeguarding and Child Protection Group](#) also provide detailed online information on all aspects of child protection.

YOUR SAFEGUARDING / CHILD PROTECTION CONTACTS

1. TG Child Protection Officer / Designated Safeguarding Lead

The Ten Garden person responsible for child protection is:

<p style="text-align: center;">Key Personnel</p> <p>The Designated Safeguarding Lead (DSL) and Prevent Lead for Child Protection (member of senior management) is</p> <p>Name: Kiki Zeng Position: Director Mobile: 07885 278 366 Email: kiki@tengarden.co.uk</p>

You should call the TG Child Protection Officer/ Designated Safeguarding Lead **FIRST** to report an issue.

2. Referral Agencies

If you think a child is in **immediate danger**: contact the police by calling **999** Otherwise, **call 101** & ask for the **Safeguarding Coordination Unit**.

3. Support and advice

- National Association for the Prevention of Cruelty to Children (NAPCC). Tel: 0800 800500
- Childline (provides help and advice for children and young people). Tel: 0800 1111



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SP2 – Safer recruitment Policy and Procedures for Host family Host

Date reviewed: 04 Mar 2019

Next reviewed date: 01 Mar 2020

Ten Garden is committed to recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children; this is an essential part of safeguarding. The robust screening of applicants is proven to act as a deterrent for offenders seeking employment with access to children in order to harm them.

To this end, TG seeks the understanding and cooperation from host family hosts and their families new to TG in the recruitment process and compliance with on-going requests for information and home visits.

DBS (Disclosure and Barring Service)

The work of TG is classified by the government as regulated activity. This is the term most commonly used to describe roles where a suitability/criminal records check is required – roles involving responsibility for or substantial access to under 18s. In broad terms, regulated activity is any position that has direct contact with children. Any person that is engaged in ‘regulated activity’ as defined by the Safeguarding Vulnerable Group Act 2006 (England & Wales) and parallel laws in Scotland and Northern Ireland requires an enhanced disclosure check.

- TG will ensure that every permanent member of the household aged 16 and over will have a current, clear and valid Enhanced DBS check.
- TG host family hosts are suggested to register annually for the DBS Update Service.

Any criminal records (including spent convictions) will be considered with reference to the Rehabilitation of Offenders Act 1974 and Exceptions to the Act.

Recruitment

Recruitment materials (host family host information) include reference to TG’s commitment to safeguarding the welfare of every pupil in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after our pupils safely, especially under 18s.

Two references are requested for every host family host. References will be followed up and referees will be asked whether there is any reason not to engage the applicant where they have substantial access to under 18s. Follow up phone calls are made to verify the references.

- Proof of identity is required (original documents will be checked on the initial home visit).
- Interview questions will explore a potential TG Host family host’s attitude to working with under 18s.
- Interview questions about disability and health will be asked in order to establish whether there may be any physical or mental obstacles to host family hosts fulfilling their specific role that cannot be overcome.
- Host family Hosts are obliged to inform Ten Garden of any change of circumstance within the home which may affect child protection, e.g.: addition of household members over the age of 16.
- Completed Safer Recruitment Checks ([Appendix b](#)) before children are placed.



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Induction

TG is responsible for ensuring that their host family hosts and families understand their safeguarding responsibilities for TG Guardianship Pupils under 18 and are skilled and confident in managing the host family and in looking after children.

The TG Induction Process

- All host family hosts have access to the **TG website** with detailed policy and Behaviour Policy for Host family/Handbook/ guidance on their responsibilities, institutional policies, procedures and expectations of professional conduct and ethical behaviour relating to under 18s.
- **A host family/welfare/safeguarding induction** is carried out by a TG Guardianship Manager.
- TG Guardianship Manager is then fully available in office hours for any further contact to respond to queries from host family hosts.
- Out of hours, a 24 hours emergency phone number is available by TG at all times.

Updates to policies

Updates to policies are uploaded to the TG website and are also sent by email to all registered TG host family hosts.

Ongoing training

All host family hosts and their families should be fully aware of systems within TG which support safeguarding and these are explained to host family hosts as part of the induction process. This includes: TG's safeguarding policy; the handbook; and the designated safeguarding lead; child protection training and e-safety.

All adults in contact with under 18s need to demonstrate appropriate Knowledge of this policy, their responsibilities and the procedures for reporting any incident of harm or abuse.

Recruitment of ex-offenders

TG will not unfairly discriminate against any applicant on the basis of conviction or other details revealed. TG makes recruitment decisions on the basis of merit and ability, if an applicant has a criminal record this will not automatically bar him/her from working with TG. In view of the fact that all positions within TG will amount to "regulated positions" within the meaning of the Protection of Children Act 1999 (as amended by the Criminal Justice and Courts Services Act 2000), they are exempt from the Rehabilitation of Offenders Act 1974.

All convictions, cautions, reprimands or final warnings that are not "protected" as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013) must be declared when applying for a position at TG. Failure to disclose a previous conviction may lead to an application being rejected or, if the failure is discovered after a host family host starts working with us, may lead to termination of contract on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence under the relevant legislation, it is unlawful for TG to work with anyone who is included on the barred lists maintained by the DBS of individuals who are considered unsuitable to work with children or vulnerable adults.

It is a criminal offence for any person who is disqualified from working with children to attempt to



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apply for a position within TG. TG will report the matter to the Police and the DBS if:

- TG receives an application from a disqualified person
- TG is provided with false information in, or in support of an application
- TG has serious concerns about an applicant's suitability to work with children

Retention of Records

If an applicant is appointed, TG will retain any relevant information provided on their application form (together with any attachments and safer recruitment checks [see Appendix](#)) and the pre-employment check data on their personnel file. If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months.



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SP2a – Safer recruitment Policy and Procedures for TG Staff

Date reviewed: 04 Mar 2019

Next reviewed date: 01 Mar 2020

Induction

Ten Garden is committed to promoting the welfare of children and young people and keeping them safe. We are also committed to equality, valuing diversity and working inclusively across all of our activities. We aim to have a workforce that represents a variety of backgrounds and cultures and can provide the relevant knowledge, abilities and skills for our organisation.

Purpose

- to recruit and select the best people available to join our workforce
- to take all reasonable steps to prevent unsuitable people from joining our organisation
- to recruit, select and manage our staff in a way that complies with legislation designed to combat inequality and discrimination
- to do all we can to achieve and maintain a diverse workforce
- to ensure that our recruitment and selection processes are consistent and transparent
- to ensure candidates are judged to be competent before we make them an offer of a job
- to ensure that new members of staff are given a proper induction

We recognise

- our workforce is our most important resource
- unsuitable individuals sometimes seek out opportunities via employment or volunteering to have contact with children in order to harm them
- some groups face unfair discrimination in the workplace
- children, young people and families benefit from our efforts to recruit and select a skilled and committed workforce from a diverse range of backgrounds
- new staff cannot perform their role effectively unless they are inducted properly and receive ongoing support and supervision.

Recruitment and Induction

- advertising all posts through appropriate media and in a way that ensures that we attract high quality applicants from diverse backgrounds
- providing an application pack with relevant information for anybody who expresses an interest in an advertised job
- ensuring that all applications are made using our standard application form ([Appendix c](#))
- involving more than one person to shortlist applicants for interview
- interview panel will always include a staff member who has completed the DFE Safer recruitment in education e-learning module: <https://www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-training>
- incorporating the views and perspectives of children, young people, and families into the recruitment and selection process whenever appropriate
- obtaining two references, two pieces of identification and original copies of any necessary qualifications from candidates
- requiring that all staff have an up-to-date relevant DBS check where their post is eligible for this (including a check against the barred list if the post involves regulated activity), and that staff and volunteers in such posts subscribe to the DBS online update service



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- providing an appropriate induction for all new staff (All TG staff have undertaken Level 1 Child Protection training).
- Completed Safer Recruitment Checks ([Appendix b](#)) before employment commences
- ensuring that all staff are made aware, during their induction period, of how to keep children and young people safe in our organisation
- appointing all staff on a trial period initially, with a review before they are confirmed in post
- using the list of processes below to follow a consistent procedure for recruitment, selection and induction.

DBS (Disclosure and Barring Service)

The work of TG is classified by the government as regulated activity. This is the term most commonly used to describe roles where a suitability/criminal records check is required – roles involving responsibility for or substantial access to under 18s. In broad terms, regulated activity is any position that has direct contact with children. Any person that is engaged in ‘regulated activity’ as defined by the Safeguarding Vulnerable Group Act 2006 (England & Wales) and parallel laws in Scotland and Northern Ireland requires an enhanced disclosure check.

TG ensures that every person working within TG and having access to information about children have a current, clear and valid [Enhanced DBS check](#), registering annually for the update service.

Recruitment, selection and induction process

1. Plan your recruitment and selection process.
2. Advertise the vacancy.
3. Review all applications against the criteria in the job/role description.
4. Create a shortlist of suitable applicants.
5. Agree the interview questions and selection tools e.g. tests, role play etc.
6. Invite your chosen candidates to be interviewed.
7. Conduct interviews and verify every candidate’s identity and qualifications.
8. Make decision on suitable appointment of candidate(s).
9. Make a conditional offer of employment or a volunteer position, subject to satisfactory references and checks.
10. Consider any confidential information that the candidate has submitted along with his/her application, and discuss this with the candidate.
11. Complete the take up of references and checks.
12. Are all issues arising from the references, checks and self-disclosed information resolved? **Yes** - confirm the offer on a trial period. **No** - withdraw the job offer.
13. Agree a start date.
14. Plan the induction.
15. New staff member starts. Follow through the induction programme.
16. Conduct scheduled reviews within the trial period to check progress.
17. After the trial period, are you satisfied with their progress? **Yes** - confirm new staff member in post. **Not completely** – consider extending the trial period and agree a further support package if appropriate. **No, progress has been highly unsatisfactory** - end the contract at this point.
18. At the end of the trial period extension, are you still unsatisfied with the new recruit’s progress? **Yes** - end contract at this point. **No** - confirm new staff member in post.



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SP3 – Whistleblowing Policy

Date reviewed: 01 Mar 2019

Next reviewed date: 01 Mar 2020

What is a whistleblower?

You're a whistleblower if you're an employee or agency worker and you report certain types of wrongdoing. This will usually be something you've seen at work - though not always. The wrongdoing you disclose must be in the public interest. This means it must affect others, e.g. the general public. As a whistleblower you're protected by law - you shouldn't be treated unfairly or lose your job because you 'blow the whistle'. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

Complaints that counts as whistleblowing

You're protected by law if you report any of the following:

- a criminal offence, e.g. fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, e.g.: doesn't have the right insurance
- you believe someone is covering up wrongdoing

Complaints that don't count as whistleblowing

Personal grievances (e.g. bullying, harassment, discrimination) aren't covered by whistleblowing law, unless your particular case is in the public interest.

Who to tell and what to expect

You can report your concern to the Director at TG. There are other options if you don't want to report your concern to TG,

- you can [get legal advice](#) from a lawyer
- tell a [prescribed person or body](#). (If you tell a prescribed person or body, it must be one that deals with the issue you're raising, eg a disclosure about wrongdoing in a care home can be made to the Care Quality Commission)
- Contact the [Advisory, Conciliation and Arbitration Service \(Acas\)](#), the whistleblowing charity [Public Concern at Work](#) or your trade union for more guidance.
- NSPCC whistleblowing helpline. Staff can call 0800 028 0285 between 8am and 8pm Monday to Friday or can email: help@nspcc.org.uk

Making your claim anonymously or confidentially

You can tell TG or a prescribed body anonymously but they may not be able to take the claim further if you haven't provided all the information they need. You can give your name but request confidentiality - the person or body you tell should make every effort



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to protect your identity. If you report your concern to the media, in most cases you'll lose your whistleblowing law rights.

What TG or a prescribed body will do

TG or the prescribed body will listen to your concern and decide if any action is needed. You may be asked for further information. You must say straight away if you don't want anyone else to know it was you who raised the concern. You won't have a say in how your concern is dealt with. TG or the prescribed body can keep you informed about the action they've taken, but they can't give you much detail if they have to keep the confidence of other people.



Safeguarding Policy

SP4 –TG Bullying (Cyberbullying) Policy and Procedure

Date reviewed: 04 Mar 2019

Next reviewed date: 01 Mar 2020

About Bullying

Bullying can occur in any group of people whatever its type or size or the age of its members. There are many different forms of bullying; at one end of the scale it can be teasing and at the other it becomes serious assault or harassment. Verbal and psychological bullying can be just as harmful and hurtful as physical violence. Sexual and racial harassment are particularly serious forms of bullying. Many children, and adults, are bullied because they are seen to be 'different' – because of their race, religion or culture, because of their sexuality, because of their gender, or because of any special educational needs or disabilities they may have.

Cyberbullying

This is a form of bullying which uses technology to deliberately harm or upset others. This type of bullying can happen in many ways, using mobile phones or the internet and could include:

- sending hurtful messages or using images
- leaving malicious voicemails
- a series of silent calls
- excluding them from chat/messaging rooms/areas
- 'happy slapping' – sending video/images of people being bullied, so others can see

Signs of Bullying

Some of the ways in which children and young people have described bullying include:

- being called names
- being teased
- being pushed or pulled around
- having money or personal possessions taken or damaged
- having rumours spread
- being ignored or left out
- being hit, kicked or physically hurt in some way
- being threatened or intimidated

Effects of Bullying

The effects of bullying can lead to children and young people:

- becoming depressed
- experience low self esteem
- becoming shy and withdrawn
- experiencing physical complaints, like constant stomach aches and headaches, which are brought on by stress
- feeling anxious

TG does not tolerate the bullying of other people in any other form whatsoever and all incidents of bullying reported to TG will be fully investigated.

TG Guardianship pupils will:

- respect other people, their space and their belongings



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- be kind to others, even if they are not our friends
- not walk away if we see someone being bullied
- try to get help and tell a responsible adult
- ask for help if we are being bullied

TG Guardianship pupils are given the following advice about bullying:

- Talk to or contact someone you trust, such as your host family host, parent, friend or your guardian.
- Be persistent. If the first person you talk to doesn't help, don't give up. Speak to someone else.
- If you can, write down everything that has been said or done to hurt you. Try to write down how you feel. When you have found someone you can trust, discuss what you have written.
- Ask the person you talk to not to do anything without telling you about it first. You have a right to know what is being done on your behalf and to say whether you think it is a good idea or not. If you find it difficult to talk to an adult ask someone to talk to an adult on your behalf.
- Telephone ChildLine (Freephone 0800 1111). Their helpers provide a confidential helpline for young people
- Telephone the TG emergency number: +44 (0) 7885 278366
- Telephone the Guardianship Manager in the TG Office: +44 (0) 7421 261159
- Most importantly, do something. Sometimes bullying stops quickly, but doing nothing means it may continue until someone is seriously upset or hurt.



Safeguarding Policy

SP5 –TG E-Safety Policy and Procedure

Date reviewed: 04 Mar 2019

Next reviewed date: 01 Mar 2020

Purpose

This policy applies to all members of the Ten Garden (including staff, pupils, parents, visitors and guests in the host family). It is a statement of the aims, principles, strategies and procedures for e-safety throughout TG. The E-Safety Policy should be read in conjunction with our Data Protection and Information Sharing Policy and Safeguarding Policy.

You have a responsibility to the Guardianship pupils in your care to know what they are doing online during their stay with you.

What is E-safety?

E-Safety refers to child protection and safeguarding of both children and adults in the digital world. It is about learning to understand and use technologies in a safe, positive way, also about supporting children and adults to develop safe online behaviours.

Risks to pupils who use the internet include:

- exposure to inappropriate materials, for example, pornographic pictures and videos
- physical danger and sexual abuse, for example, through 'grooming' by paedophiles
- cyberbullying – persistent bullying through the digital medium
- losing control over pictures and videos
- obsessive use of the internet and ICT, for example, addiction to video games
- damage to online reputation
- inappropriate or illegal behaviour, for example, exposure to hate mail or offensive images
- viruses, hacking and security
- exposure to extremist material and the possibility of radicalisation
- copyright infringement, for example, the illegal sharing of music, pictures, video or documents

E-safety is largely concerned with internet communications. The internet is accessible from computers, laptops, tablets, mobile phones, games consoles and other devices like the iPod Touch and internet connected TV. Other communication technologies such as texting and phone calls are also covered by the term 'E-Safety'.

Why provide internet access?

The internet is an essential element in 21st century life for education, business and social interaction. TG encourages the provision of quality internet access to enable Guardianship pupils to communicate with home and as a necessary tool for school work.

TG host family hosts are expected to install appropriate parental control software on their routers.

Internet

- TG Guardianship pupils aged 10-13 must have adult supervision whilst using the internet.
- TG Guardianship pupils will be encouraged to tell their host family host immediately if they encounter any material that makes them feel uncomfortable.
- Internet access will be filtered appropriate to the age of the pupils.



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Email

- All emails sent must be professional in tone and content.
- TG Guardianship pupils must immediately tell an adult if they receive offensive email.
- TG Guardianship pupils must not reveal personal details of themselves or others in email communication (such as address or telephone number). TG Guardianship pupils must not arrange to meet anyone without specific permission.
- TG Guardianship pupils should be made aware that the writer of an email (or the author of a web page) may not be the person claimed.

Social Networking

TG Host family hosts shall:

- behave responsibly and professionally at all times in connection with the use of social networking sites and keep up to date with privacy policies of the sites they use
- ensure that all communication with TG Guardianship pupils (including on-line communication) takes place within clear and explicit professional boundaries
- use their professional judgment and, where no specific guidance exists, take the most prudent action possible and consult with the Director of TG if they are unsure
- co-operate with TG in ensuring the implementation of this policy

Chatroom and Instant Messaging:

- TG Guardianship pupils are not permitted to use these facilities on a host family host's computer

TG Guardianship pupils:

- must hand mobile phones, tablets, portable electronic games and media players brought to the host family to the host family host at night-time, if requested by the host family host
- are forbidden from sending abusive or inappropriate text messages
- may have their internet activity checked
- never give out your real name, never tell anyone where you go to school, never give out your address or telephone number, never agree to meet anyone from chatroom on your own, tell an adult if someone makes inappropriate suggestions to you or makes you feel uncomfortable on line

TG Website:

- The point of contact on the website will be the Guardianship Organisation address, email and telephone number. Host family host or pupil personal information will not be published.
- Website photographs that include TG Guardianship Pupils will be selected carefully and will only be published with parental permission
- TG Guardianship Pupils' full names will not be used anywhere on the website, particularly in association with photographs.

Cyberbullying:

Cyberbullying is the use of the internet and related technologies to harm other people, in a deliberate, repeated, and hostile manner. When children are the target of bullying via mobile



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phones, gaming or the internet, they can often feel very alone and, a once previously safe and enjoyable environment or activity, can become threatening, harmful and a source of anxiety. Cyberbullying (along with all forms of bullying) will not be tolerated. All incidents reported will be recorded and investigated.

TG Host family Host Data

- TG host family hosts must not share their user account details and must not leave their computers unlocked and accessible to pupils.

TG Guardianship pupils:

- All TG Guardianship Pupils must sign the Student Profile Form for Guardianship Pupils.
- E-Safety rules will be given to Guardianship Pupils in their pupil handbook.
- Any breaches of the Code of Conduct with reference to ICT will be referred directly to TG and Internet access will be denied.
- TG Guardianship Pupils will be informed that network and internet use on a host family host's computer will be monitored.

Parental Support

- Parents' attention will be drawn to TG's E-Safety Policy in the parent handbook.
- Parents will be asked to read through the TG Guardianship Student Handbook with their child and for the pupil to sign the agreement.

Policy Implementation

All new TG host family hosts receive e-safety advice and guidance as part of their induction programme to ensure they understand their responsibilities, as detailed in this policy.



Safeguarding Policy

SP6 –TG Confidentiality and Information Sharing Policy

Date reviewed: 04 Mar 2019

Next reviewed date: 01 Mar 2020

Purpose

Staff will only discuss concerns with the Designated Safeguarding Lead, senior manager and manager (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

We will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL will be in the most informed position to make contact with the parent in the event of a concern, suspicion or disclosure.

However, if we believe that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from Social Care Direct.

The Seven Golden Rule for Safeguarding Information Sharing

- Data Protection/Human rights laws are not a barrier
- Be open and honest. (unless unsafe or inappropriate)
- Seek advice. (anonymise if necessary)
- Share with consent if appropriate.
- Consider safety and wellbeing.
- Necessary, proportionate, relevant, adequate, accurate, timely and secure.
- Keep a record of decision and reason for it.

The Data Protection Act does not prevent organisation staff from sharing information with relevant agencies, where that information may help to protect a child. Ideally information sharing will be done in writing so that there is an evidence trail however there may be occasions where this method is too slow. **In cases where agencies such as MASH (Multi Agency Safeguarding Hub) ring TG requesting information reception staff will take a message and inform the DSL immediately,** the DSL will ensure they can identify who is requesting the information before sharing and then record what has been shared, when, why and with whom.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the DSL

Useful Link

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf



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Safeguarding Policy

SP7 –TG Missing Student Policy

Date reviewed: 04 Mar 2019

Next reviewed date: 01 Mar 2020

Missing Student procedure

A pupil may be identified as missing if their whereabouts cannot be confirmed visually, from information provided by the pupil or other trustworthy people with regard to their movements or telephone contact with them or their parent/guardian. All staff will be aware of the signs of risk and individual triggers including travelling to conflict zones, FGM and forced marriage. All pupils will be placed on admission and attendance registers as required by law.

We will inform the local authority of any child removed from our admission register. We will inform the local authority of any student who fails to attend for a continuous period in line with local Brighton and Hove procedures. Missing Officer – (details in [9.Local Support](#)).

If a host family host thinks a pupil is missing, they must:

- attempt to ascertain whereabouts from the last people in contact with the pupil
- attempt to contact the pupil on his/her mobile phone check all places the pupil was last seen

If a pupil is still missing, the host family host should contact the TG Director (Kiki Zeng, 24 hours contact number 07885 278366) or member of staff on duty by telephone. Host family hosts should NOT telephone parents themselves.

TG will:

- contact their parents/guardians (with due regard for time zones).
- request assistance as appropriate.
- request a search of local roads, shops, potential haunts etc. is made on foot or by car where appropriate.

On completion of this and any subsequent searches made, the Director and parents/guardians will continue to be informed of progress.

The Director (or in her absence, the person on duty), will arrange for the Police to be informed.

If the pupil is found, or the incident is otherwise resolved:

- the Director will be directly informed directly by the host family host
- the Police will be informed if they have been involved.
- the Director will initiate a full inquiry, and provide a written report
- this report and the incident log will be kept securely in the TG Office

After the incident:

- the host family host or Guardianship manager will sensitively discuss the incident with the pupil
- the Director will sensitively discuss the incident with the parents/guardian



Safeguarding Policy
SP8 –TG Travel Policy and Procedure

Date reviewed: 04 Mar 2019

Next reviewed date: 01 Mar 2020

Pupil Travel

TG is committed to safeguarding the welfare of every pupil in its care and this includes making safe arrangements for arrival, departure and travel within the UK.

Under 18s

- All pupils under 17 travelling without an adult should book a TG transfer or be met by a local guardian.
- Travel arrangements are arranged through the Guardianship Manager at TG Office and not directly with the host family host.
- In no circumstances will under 12s be allowed to travel alone or by public transport. It is a condition of enrolment on the guardianship scheme that suitable transfer arrangements for pupils are in place.
- In the event that a pupil is given permission to travel by public transport to the host family host, school or airport, then full travel details must be forwarded to the TG Guardianship Manager. Parents must sign a disclaimer absolving TG of all responsibility for the journey as TG cannot be responsible for children travelling independently.
- Full transfer booking information is provided by TG to the pupil including the meet and greet service, driver telephone number, TG emergency telephone number, the destination address and contact details and emergency procedures. The travel information includes the departure airports, flight and times, and any connecting flight details, as well as the arrival data.
- Pupils are given travel advice to accompany their transfer confirmation telling them what documents they need to bring with them and emergency procedures.
- Pupils are informed that they could be delayed at four points once they have landed: immigration; a possible medical check; waiting for luggage; or at customs control checking what passengers are bringing into the country.
- Pupils are informed that they may be asked detailed questions about why they are coming to the UK, the school, their Host family Host and family and who is meeting them at the airport.

Booking Flights

Parents/Partners will:

- Book flights in good time to ensure suitable daytime flights are available on the required dates of travel.
- Book flights which arrive/depart between 9am and 9pm. Earlier or later flight times are extremely difficult to manage as they are not acceptable times to arrive or depart as a guest in a host family host's home and are not compliant with most school policies.
- Complete detailed travel information for the arrival of the child no less than five working days before the child departs. Last-minute arrangements are not acceptable, as messages could go astray and children could arrive without anyone to meet them
- Book an Unaccompanied Minor Service for any child travelling alone under 14 directly with the airline and inform TG that the child is travelling as a UM so appropriate arrangements for this can be made and the child is handed over to the named TG representative.
- Buy an inexpensive mobile for their child before they leave their home country, ensure



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this is suitable for use in the UK with international roaming, is fully charged and with sufficient credit for an emergency call. The mobile must be switched on as soon as immigration has been passed and TG must be provided with the mobile number when sending the travel information.

Safe Travel

- A 24 hour emergency number is available and TG appointed drivers or host family hosts will call the person on duty if there are any problems whatsoever with the travel arrangements, such as delays or flight cancellations.
- Drivers and host family hosts providing the meet and greet service will stand in a prominent position in the arrivals hall using the TG welcome sign with the pupil's name on it.
- TG has clear comprehensive lists of arriving and departing pupils, showing the name, sex, age, flight and connection details, airport terminal numbers and mobile numbers available to the weekend duty person. A laptop computer is provided with mobile Wi-Fi so duty staff can check airport information and log onto the TG database to check information, access pupil data and check what parental permission has been given on the TG Safeguarding Form.
- Taxi companies that TG work with have enhanced DBS checks for all their drivers and have signed a service agreement with TG to ensure a high quality service.

Travel with Host family

- Host family hosts and their families who transport TG pupils are required to have their car fully insured and to comply with the law regarding child restraints.
- Host family hosts are advised to sit under 18s in the rear of the car when transporting pupils. This avoids any likelihood of any accusations of inappropriate behavior.



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9. Liaison with Parents, School and Local Support

With School

- keep in regular contact with the guardian pupils' school, and liaise with at the school and then ask that they disseminate information to others within the school as appropriate. Also check that information has reached the relevant people within the school, for instance the house parent or tutor, rather than just the registrar.
- inform their liaison contact at the school whenever they are visiting the site.
- provide schools with a statement of service, showing which students they are responsible for and what services each student's parents have requested they provide. This statement must be sent at the start of each academic year or when a new student joins the school.
- provide TG Student handbooks to the schools for information.
- to liaise with the school where appropriate concerning all travel and transport arrangements.
- to liaise with the school where appropriate regarding any host family arrangements.

With Parents

- keep in regular contact with the guardian pupils' parents, sharing/translate guardian pupils school report and tutor's communication.
- provide parents with a statement of service,
- provide TG Parents handbook for information.
- to liaise with the school where appropriate concerning all travel and transport arrangements.
- to liaise with the parents where appropriate regarding any host family arrangements.

With Local Support

- keep in regular contact with Brighton & Hove LSCB and ensure they are aware our activity
- make sure receive latest training information from LSCB
- **Brighton & Hove LSCB**
 - Phone: 01273 292379
 - Email: LSCB@Brighton-hove.gov.uk

Other contact information

- **Brighton and Hove Children Missing Education officer**
 - Phone: 01273 291310
 - Email: cme@brighton-hove.gov.uk
- **Social Care Direct & Early Help**
 - Phone: 01273 290400
 - Email: FrontDoorForFamilies@brighton-hove.gcsx.gov.uk
- **East Sussex District Domestic Abuse Service DAS**
 - Phone: 0300 323 9985
 - Email: info@theportal.org.uk
- **Brighton & Hove Designated Officer (LADO): Darrel Clews**
 - Phone: 01273 295643
 - Mobile: 07795 335879
- **NSPCC**
 - Website: <http://www.nspcc.org.uk/services-and-resources/>



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- **Sussex Prevent Team**
 - Phone: 101
 - Email: prevent@sussex.pnn.police.uk
- **Sussex CSE Police Team**
 - Phone: 101
- **Brighton & Hove Child Missing Education Officers**
 - Phone: 01273 291310
 - Email: cme@brighton-hove.gov.uk
- **NSPCC Whistleblowing Helpline**
 - Phone: 0800 028 0285
 - Email: help@nsppc.org.uk

Support Link

OnlineSafety

<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/>

National Association People Abused in Childhood NAPAC

<https://napac.org.uk/>

Stop It Now

<http://www.stopitnow.org.uk/>

<http://www.wakefield.gov.uk/residents/community-and-housing/community/hate-crime>



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Appendix

- a. **Risk Assessment Form Appendix a. Risk Assessment.docx**
- b. **TG Application Form Appendix b. Application Form.docx**
- c. **Safer Recruitment Check Appendix c. Safer Recruitment Checks.xlsx**