



Gateway Safeguarding Procedures

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1. PURPOSE & SCOPE

- 1.1 This is a supporting document to the Gateway Safeguarding Policy and should be read in conjunction with the policy
- 1.2 This document captures the procedures associated with safeguarding at Gateway, i.e. procedures to protect children, young people and adults at risk (where a child is defined as a person under the age of 18¹ (The Children Act 1989)) who receive Gateway services, from all forms of abuse – namely neglect, physical, sexual or emotional abuse
- 1.3 This document is intended for use by all staff, host families, sessional workers, students or anyone working on behalf of Gateway, and it applies to all Gateway activities.

2. RECRUITMENT

- 2.1 The aim of the recruitment and selection process for staff and host families is to ensure that the best person for a particular role is appointed. However, Gateway needs to balance the need to protect the interests of young people with its desire not to discriminate unfairly against ex-offenders
- 2.2 All responsible adults who have interaction with children must:
 - Be carefully selected,
 - Be appropriately trained and qualified to ensure the safe provision of services
 - ⊕ Be checked by the Disclosure and Barring service (DBS) using the enhanced DBS check.
 - Have a minimum of two appropriate references (one professional and one personal reference)
 - ⊕ Undertake mandatory safeguarding training and will agree to attend further training as defined by Gateway.
 - Understand and accept their responsibility for the safety of students in their care
 - Understand and comply with the Code of Conduct at all times.

3. GUIDANCE

- In general,
- 3.1 Gateway shall promote, demonstrate and incorporate the values of fairness, trust and ethical practice – staff must respect all individuals whatever their age, development stage, ability, sex or sexual orientation
 - 3.2 All responsible adults shall behave and dress in a manner that promotes recognised good practice in relation to safeguarding
 - 3.3 All responsible adults must record and report all accidents or incidents involving staff or participants as soon as practically possible.
 - 3.4 If entering students' accommodation, all responsible adults should make sure there is another adult present where practical.

- When planning activities,
- 3.5 Gateway will carefully plan with care and safety as the primary concern
 - 3.6 Gateway will comply with the standards set by the relevant professional body
 - 3.7 When considering third party premises for activities, Gateway must ensure that they have a 24 hour emergency contact system in place.
 - 3.8 Gateway shall keep an attendance register for all activities
 - 3.9 Gateway shall ensure all activities with students is alcohol free.

¹ Or 20 if the child is disabled or has been in local authority care at any time since the age of 16.

- 3.10 Gateway will ensure a trained first aider is in the near vicinity at all times and one accompanies students on all excursions, with a complete and in date first aid kit.

Undertaking risk assessments,

- 3.11 Gateway must ensure to give due regard to issues of safety at all times. This includes carrying out appropriate risk assessments before all activities which involves identifying risks and means of reducing or eliminating these
- 3.12 Gateway must ensure to implement the required actions identified by the risk assessment process and review the effectiveness of these on a regular basis.

4. PROHIBITED PRACTICES

- 4.1 All responsible adults shall avoid being alone with students, shall not take them to your home and shall avoid spending excessive amounts of time with children away from others.
- 4.2 All responsible adults shall not engage in rough physical activities apart from structured, supervised activities.
- 4.3 All responsible adults shall not allow or engage in inappropriate touching of any form, sexually provocative activities or make sexually suggestive comments about or to a student even in fun.
- 4.4 All responsible adults shall not do things of a personal nature for students that they can do themselves. If the adult has to do things of a personal nature for students (particularly if they are young or disabled), then s/he should obtain the full consent of their parents and ensure a second adult is present.
- 4.5 All responsible adults shall not allow students to use inappropriate language unchallenged.
- 4.6 All responsible adults shall not reduce a child to tears as a form of control.

When managing disclosures,

- 4.7 All responsible adults shall not let an allegation a student makes during a group session go unchallenged or unrecorded.
- 4.8 No responsible adult should dismiss a disclosure without documenting it and escalating it accordingly.
- 4.9 All responsible adults shall not ask leading questions.
- 4.10 All responsible adults shall not take photographs or examine an injury.
- 4.11 All responsible adults shall not ask a child to sign a written copy of the disclosure.
- 4.12 All responsible adults shall not confront another person allegedly involved (adult or child).

5. PHOTOGRAPHY AND INTERVIEWS

- 5.1 Gateway will set appropriate rules in line with the service being provided and Gateway policies.
- 5.2 Gateway will use models or illustrations for promotion and will not use full names matched to photographs.
- 5.3 Gateway will seek formal permission for the use of any images or quotes, apart from child protection issues, photographs, and quotes / interviews that identify the person, are classed as personal information and, as such are governed by Data Protection laws (refer to Gateway's Data Protection policy and procedures).
- 5.4 Gateway staff will not use their own personal mobile phones to take photographs of students.

6. SAFEGUARDING CHILDREN AND YOUNG PEOPLE FROM DANGEROUS DOGS

- 6.1 When placing children or young people with homestay families, the Accommodation Manager will ensure the child will be safe, this includes protecting them from dangerous or poorly managed dogs.
- 6.2 On initial homestay inspections, the Accommodation Manager must enquire about pets within the family home. Information must be recorded relating to the type of animal, the breed and age
- 6.3 If the Accommodation Manager discovers a dog that could be prohibited or potentially dangerous, report: the description of the dog, name of breed and name of the owner to the police by calling: 101.

7. KEEPING CHILDREN AND YOUNG PEOPLE SAFE ONLINE

The guidance provided below is specific for certain roles, such as for host families adults and should be followed accordingly.

- 7.1 All responsible adults shall discuss with the student what is acceptable online behaviour at the outset – Gateway Staff will signpost Host Families to the NSPCC online guidance checklist.
- 7.2 All responsible adults should discuss clearly with students about how to keep themselves safe online and how to report online abuse.
- 7.3 All responsible adults shall talk frankly to the student about how they behave towards others, particularly with regard to what they post online. The adult can have frank conversations covering bullying, posting hurtful, misleading and untrue comments, dangers of behaviours like sexting and in appropriate use of webcams.
- 7.4 All responsible adults shall talk frankly to the student about how they explore issues related to the health, wellbeing, body image and sexuality of themselves and others online, if they raise this topic.
- 7.5 All responsible adults shall review and adjust parental settings in line with the student's age and maturity.
- 7.6 All responsible adults shall be clear in their mind on issues such as copyrighted material and plagiarism so that s/he can explain to the student what is legal and what is not.
- 7.7 All responsible adults shall discuss the dangers and consequences of hacking if needed.

8.

9. REPORTING

WHAT TO DO IF A DISCLOSURE IS MADE – STAFF, VOLUNTEERS AND HOST FAMILIES

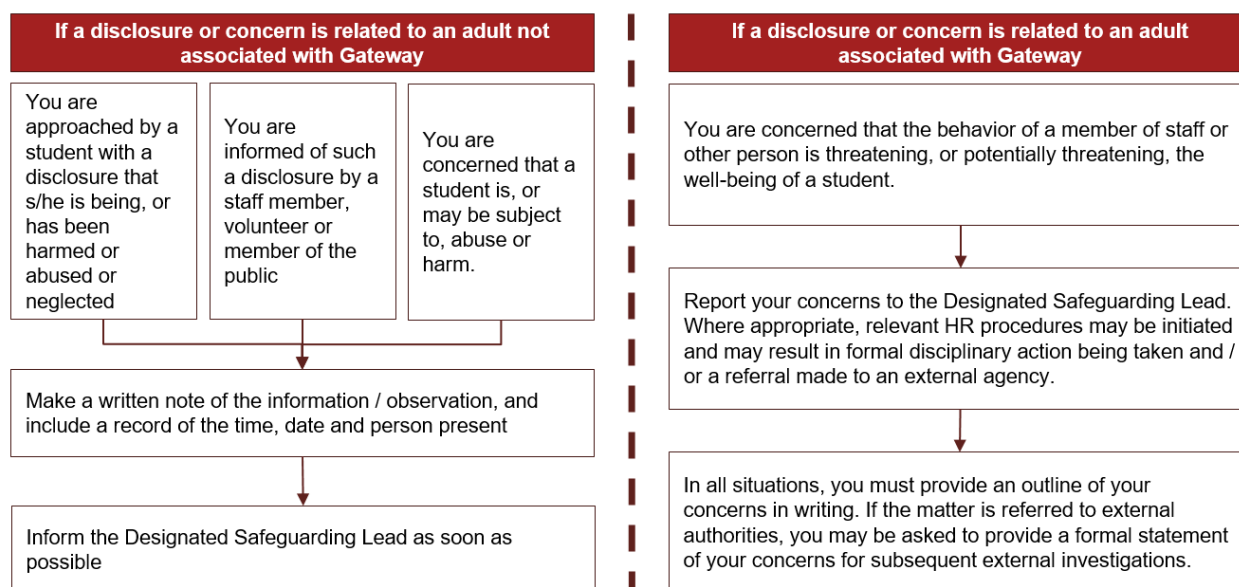
Dealing with a disclosure,

- 9.1 If a child makes a disclosure or if concerns are received from other sources, it is important to not attempt to investigate and not ask leading questions or attempt to examine the child. Listen and reassure the child, but never promise confidentiality.
- 9.2 Complete the logging a concern form with what has been disclosed at the earliest possible opportunity, include the date and time, and sign the note. This must be reported to the Designated Safeguarding Lead (DSL)
- 9.3 Inform the child or the other party who has raised the concern as to what actions have been taken.

- 9.4 It is not the responsibility of Gateway staff to decide whether or not child abuse has taken place. It is imperative that staff do not attempt to investigate child protection concerns with other students; concerns should be taken to the DSL.

Reporting a disclosure or concern,

- 9.5 Figure 1 shows how a staff or host family can report a disclosure or concern.



WHAT TO DO IF A DISCLOSURE IS MADE – DESIGNATED SAFEGUARDING LEAD (DSL)
 (The following is also presented in a figure in Annex 1 – Designated Safeguarding Lead - Reporting Procedure for Concerns).

If a disclosure or concern does not relate to an adult,

- 9.6 Begin a case file for the student where there are concerns, with an overview chronology which will hold a record of communications and actions. This record must be stored securely
- 9.7 If the initial enquiry does not need to be referred to investigating agencies, please inform the initiating adult and monitor the situation. Seek advice from the Multi-Agency Safeguarding Hub (MASH) if in doubt, contact details can be found in Annex 1 – Safeguarding Contacts List of the Safeguarding Policy
- 9.8 Where a child protection concern requires immediate intervention, contact MASH by telephone. Follow this up with written confirmation within 24 hours using the appropriate local authority agency referral form.
- 9.9 If the student already has a Child Protection Plan in place, contact the Social Worker directly with concerns or further disclosures.

ALLEGATIONS WHICH RELATE TO AN ADULT THAT MEET THE HARM THRESHOLD

- 9.10 Where an allegation is made against a staff member, volunteer or host family, the Designated Safeguarding Lead will decide if this meets the harm threshold and they have:
- Behaved in a way that has harmed a child, or may have harmed a child and/or
 - Possibly committed a criminal offence against or related to a child and/or

- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 9.11 For allegations that meet the harm threshold, the DSL will follow Keeping Children Safe in Education guidance.
- 9.12 It is not the responsibility of the DSL to investigate the allegation; they must refer and be guided on further actions.
- 9.13 The DSL will make an immediate referral to the Local Authority Designated Officer (LADO) and be guided by what actions to take; this may include working with the police and children's social care.

ALLEGATIONS WHICH RELATE TO AN ADULT THAT DO NOT MEET THE HARM THRESHOLD (LOW LEVEL CONCERN)

- 9.14 A low-level concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of Gateway may have acted in a way that:
- Is inconsistent with the staff or host family code of conduct, including inappropriate conduct outside of work, and
 - Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.
- 9.15 Examples of such behaviour could include
- Being over friendly with children
 - Having favourites
 - Taking photographs of children on their mobile phone
 - Taking photographs of children on their mobile phone
 - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
 - Humiliating children
- 9.16 Gateway promotes an open and transparent culture to any safeguarding concern which includes concerns against members of staff, volunteers and homestays.
- 9.17 Low-level concerns should be reported to the DSL in the same manner as other safeguarding concerns, using the 'cause for concern' form.
- 9.18 If the DSL is in any doubt as to whether the information which has been shared about a member of staff, volunteer or host family as a low-level concern in fact meets the harm threshold, they should consult with LADO.
- 9.19 The DSL must record this information securely, within the HR Only folder on OneDrive.
- 9.20 Records must be reviewed so that potential patterns of inappropriate behaviour are identified. Where a negative pattern of behaviour is identified, the DSL must liaise with the Chief Operating Officer and/or Proprietor to decide if disciplinary procedures are appropriate or a referral to LADO is needed.
- 9.21 The DSL and COO/Proprietor should collect as much evidence as possible and arrange to speak directly to the person raising the concern, along with any other witnesses.
- 9.22 The DSL and COO/Proprietor will arrange to meet the individual involved, and make a record of the conversation, any further actions taking and a rationale. Further actions could include:

- Informal guidance or reflective discussions with the individual
- Additional training and/or supervision
- Monitoring of future conduct

10. CONFIDENTIALITY

- 10.1 It is recognised that all matters relating to child protection are confidential.
- 10.2 The DSL will disclose personal information about a student to other members of staff on a need to know basis.
- 10.3 However, all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 10.4 All staff must be aware that they cannot promise a child to keep secrets which might compromise that child's safety or well-being or that of another.
- 10.5 Gateway will support and protect anyone who reports his/her concern that a colleague is or may be abusing a child.
- 10.6 All records will be stored securely with limited access to designated people.

11. GATEWAY SUPPORTING POLICIES AND PROCEDURES

This procedures document should be read in conjunction with the following Gateway policies and procedures:

- Gateway Safeguarding Procedures
- Gateway Anti Bullying Policy
- Gateway Prevent Policy
- Gateway Missing Child Policy
- Gateway Safer Recruitment Policy
- Gateway Whistleblowing Policy
- Gateway Host Family Health and Safety Policy
- Gateway Homestay Guidebook
- Gateway Student Code of Conduct
- Gateway Acceptable Computer Use Statement for Students
- Guidance and Advice to Hosts – Computer and Internet Usage
- Gateway Data Security and Information Sharing Policy.
- Gateway Mental Health Policy

For staff: These documents can be found on One Drive under HR/Safeguarding Policies. For host families: These documents are to be provided upon agreement of contract and by the Gateway Accommodation Manager.

12. REVIEW

This procedures document and the Gateway Safeguarding Policy must be reviewed and updated by Gateway to reflect any relevant changes in legislations, arrangements, approach or procedures. As a minimum, it must be reviewed annually by the DSL, or following any relevant change in the business model, to ensure it is up to date and any amendments have been made as necessary.

Annex 1 – Designated Safeguarding Lead – Reporting Procedure for Concerns

