



National Star

Realising the aspirations
of people with disabilities

Working with National Star Safeguarding Policy (Wales)

Senior Manager Responsible	Reviewed by	Approved by	Date Approved	Next Review Date
Lynette Barrett	Marina Wheale Sept 2026	Board of Trustees		

1. About this Policy

1.1 This Policy should be read in conjunction with the National Star Safeguarding Procedures and links to the following policies, guidance and legislation:

- Recruitment and Selection Policy
- Disciplinary Policy
- Whistleblowing Policy - Whistleblowing Advice Line 0800 028 0285
- Anti-Bullying Policy
- Complaints Policy
- Health and Safety Policy
- Mental Capacity Act Policy
- Technology & Social Media Acceptable Use Policy
- Guidance on Safer Working Practice
- Person Missing or Absent from Education Protocol
- Prevent Risk Assessment
- Prevent Procedure
- Safeguarding Children in education: handling allegations of abuse against teachers and other employees (2014)
- Modern Slavery Act statement

1.2 This document sets out National Star policy on responding to concerns regarding the safeguarding and protection of children and young people aged under 18 years and adults at risk of neglect or abuse. The policy and the associated procedures provide guidance to all employees who may have concerns of this nature within the context of their work.

1.3 This Policy fulfils the requirements of:

- Health and Social Care Act (2012)
- Social Care & Wellbeing (Wales) Act (2014)
- The Children Act 1989 and (2004)

- The Protection of Children Act (1999)
- The Sexual Offences Act (2003)
- The Human Rights Act (1998)
- Mental Capacity Act (2005)
- Working Together to Safeguard People Guidance (Wales) (2022)
- Care Act (2014)
- Safeguarding Vulnerable Groups Act (2006)
- Equality Act (2010)
- Deprivation of Liberty Safeguards (2009)
- The All Wales Safeguarding Procedures (2019)
- Children and Families Act (2014)
- Keeping Learners Safe (2022)
- Safeguarding Children in Education (2014): handling allegations of abuse against teachers and other employees
- Prevent Duty Guidance (2023)
- Safeguarding Children, Working Together under the Children Act (2004)

2. Scope

2.1 This policy applies to all employees, Governors, Trustees, volunteers and service users. Employees from other organisations working with people on our premises or with college learners or National Star residents will also be expected to follow this policy.

3. Statement

3.1 National Star regards the protection of children and adults at risk, including online, as a priority and is committed to safeguarding these groups.

3.2 The principles of this policy are as follows:

- The protection of children, young people and adults at risk is everyone's responsibility. Employees should not assume someone else will take action.
- National Star will follow statutory and specialist guidelines in working with children, young people and adults (service users) at risk.
- This includes children, young people and adults from outside of National Star who are using our settings.
- National Star will seek to support all those affected by abuse.
- National Star will seek to prevent vulnerable people from radicalisation or undue influence that may cause harm to themselves or others.
- National Star will review its Safeguarding Policy annually.
- Ensuring all service users know who they can approach in the organisation if they are worried or in difficulty.

4. Review

4.1 This policy is available on the National Star intranet.

4.2 This Policy will be reviewed annually by the Head of Safeguarding to respond to changes in legislation and current practice and the outcome of reviews undertaken by the Safeguarding Operational Group and Safeguarding Strategy Group.

4.3 This policy will be presented to the Governor's Committee every year.

Appendix 1

5. Additional Information

- 5.1 National Star recognises that its duty to safeguard service users encompasses specific safeguarding issues including child exploitation in relation to criminal, sexual and financial exploitation and including modern slavery; child-on-child abuse; sexual harassment and sexual violence; Female Genital Mutilation (FGM); forced marriage, radicalisation, mental health, up- skirting, domestic abuse and the importance of online safety including understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help; simulated harmful online artificial Intelligence (AI) interactions and making, sending or receiving self-generated intimate images using AI.
- 5.2 Where there is a safeguarding concern, service users wishes and feelings will be considered (where appropriate) when determining what action to take and what services to provide.
- 5.3 All concerns, including **low level** concerns (that do not meet the threshold for harm), will be treated seriously and investigated appropriately.
- 5.4 The Chair of Governors will liaise with the local authority on safeguarding issues in the event of an allegation being made against the Chief Executive.
- 5.5 The Head of Safeguarding is the Designated Safeguarding Lead (DSL), this also covers the duties of the Designated Safeguarding Person (DSP). The DSL/P has overall responsibility for safeguarding within the organisation. The organisation's Director of Services for Long-Term Living residents and Day students acts as the Deputy Designated Safeguarding Lead/Person (DDSL/P).
- 5.6 National Star also employs a Safeguarding Practitioner and Safeguarding Co-ordinator, both of whom provide advice and support to other employees on welfare and safeguarding matters. During core working hours the DSL/P, DDSL/P Safeguarding Practitioner or Safeguarding Co-ordinator will be available. Outside of these hours all safeguarding concerns should be reported to the on-call manager.
- 5.7 Employees who have concerns about a service user should raise these with the DSL/P, DDSL/P Safeguarding Practitioner or Safeguarding Co-ordinator, who will decide whether to make an alert to the Local Authority Safeguarding Team. However, any employee member can refer their concerns about a child or adult at risk to the relevant service directly. Where an allegation or suspicion of abuse has been reported to the relevant Local Authority Safeguarding Team, National Star will work in partnership with them to determine the next steps.
- 5.8 Should a referral to any Local Authority (including social care) be made in respect of serious safeguarding concerns (in respect of all service users up to the age of 18, and high needs service users aged 18 to 25), the DSL/P shall ensure the ESFA are notified that a referral has been made.
- 5.9 Should a referral be made regarding an individual service user for the purposes

of determining whether that service user should be referred to a panel for the carrying out an assessment under section 36 of the Counter-Terrorism and Security Act (2015) of the extent to which that individual is vulnerable to being drawn into terrorism, the DSL/P will ensure the ESFA are notified that a referral has been made.

- 5.10 The police will be contacted where a safeguarding concern could lead to potential willful neglect or ill treatment of a service user. This includes all concerns around care and support needs.
- 5.11 Any service user that raises or is involved in a safeguarding concern who has capacity, will be offered appropriate support to decide whom they wish to be informed (i.e. family or carers).
- 5.12 In the event of a safeguarding concern, families and carers of service users who lack capacity will be contacted at the earliest, most appropriate time - unless the family member or carer is directly implicated in the concern. Communication with families and carers will be regular, open and transparent.

6. Deputyship

- 6.1 Where a family member or carer holds Deputyship i.e. Health & Welfare / Property and Affairs for a National Star service user, relevant information in accordance with the appropriate authorisation and terms of the order will only be provided at the prior request of the Deputy.
- 6.2 National Star should not have direct access to client funds such as receiving benefits/pension or any other sort of income. The organisation recognises that the Deputy is the only person legally authorised to directly manage service user funds.
- 6.3 Where National Star is left with service user funds to provide personal allowance for the service user, the organisation will clearly document the use of these funds and provide relevant information as and when requested by the Deputy, so they are able to present a clear annual report to the Office of the Public Guardian.

7. Early Help

- 7.1 Early Help will be achieved through Learning Journey Co-ordinators / Tutors engaging with a range of agencies to coordinate Education Health Care plans /S140 (Wales) or where a child may be at risk of modern slavery, being radicalised or exploited, or if a young carer is showing signs of being drawn into anti-social behaviour, including gang involvement and association with organised crime groups. National Star will engage other services where necessary

8. Child-on-Child Abuse

- 8.1 In line with the All-Wales Safeguarding Procedures, National Star has a duty to protect service users against child-on-child abuse (peer-on-peer abuse in relation to over 18-year-olds. There are many forms of abuse that can occur between children and adults at risk, such as physical abuse, sexually harmful behaviour/sexual abuse, sexual harassment and sexual violence, bullying (including banter), cyber bullying, sexting, up skirting initiation/hazing and prejudiced behaviour.
- 8.2 All concerns around child-on-child or peer-on-peer abuse must be reported to the Emotional Wellbeing and Safeguarding teams via a Behaviour Observation Incident Report (BOIR).
- 8.3 Where appropriate, the Local Authority Safeguarding Team and the funding authority will be notified.
- 8.4 National Star will exercise care in the appointment of all those working with children, young people and adults at risk, working to 'Keeping Learners Safe' by ensuring that everyone working with children and adults at risk:
- Has undergone pre-employment checks in line with current legislation including an appropriate Disclosure and Barring Service check.
 - Is adequately trained and supervised.
 - Understands and follows the National Star Safeguarding Policy and Procedures.
 - Understands and follows National Star Safer Working Practice Guidance.
 - Understands the Prevent Procedures.
 - Is registered with their relevant professional body (if appropriate).
- 8.5 All employees, including volunteers, will undertake safeguarding training on a regular basis and demonstrate their knowledge in their practice.
- 8.6 All employees working within National Star will attend Prevent Training and embed the strategy into their everyday work.
- 8.7 National Star will promote safeguarding through improving service knowledge of their own safety, and by ensuring they are and feel safe.
- 8.8 National Star has a zero-tolerance approach to child-on-child and peer-on-peer abuse. It is recognised that even if there are no reported cases, this does not mean it is not happening within the organisation.

9. **STOMP** (Stopping over medication of people with learning disabilities, autism, or both)

- 9.1 As a care provider who administers psychotropic medication to people with a learning disability, autism, or both, we adopt the STOMP health care pledge:
- We will actively explore alternatives to medication.
 - We will ensure people with a learning disability, autism, or both, of any age and their circle of support are fully informed about their medication and are involved in decisions about their care.
 - We will ensure all staff within the organisation have an understanding of psychotropic medication including why it is being used and the likely side effects.
 - We will ensure all people are able to speak up if they have a concern that someone is receiving inappropriate medication.
 - We will maintain accurate records about a person's health, wellbeing and behaviour.
 - We will ensure that medication, if needed, is started, reviewed and monitored in line with the relevant NICE guidance.
 - We will work in partnership with people with a learning disability, autism or both, their families, care teams, healthcare professionals, commissioners and others to stop over medication.
- 9.2 Any concerns in relation to the over-medication of service users should be reported to the Safeguarding team.

10. Roles & Responsibilities

- 10.1 National Star's Board of Governors is responsible for the implementation and supervision of this policy. A nominated member of the Board will lead on safeguarding and the Board will receive regular reports on safeguarding matters.
- 10.2 All safeguarding procedures will be implemented by all employees and volunteers.
- 10.3 The Safeguarding Operational Group will undertake a review of safeguarding cases.
- 10.4 The Safeguarding Strategy Group will undertake a review of safeguarding practice.
- 10.5 The DSL/P and Designated Senior Managers (where appropriate) will be responsible for investigating any safeguarding concerns reported at all services except those in Wales.
- 10.6 For services in Wales, operational safeguarding issues will be the responsibility of the nominated Safeguarding Co-ordinator at the service location, in liaison with the DSL/P or Deputy DSL/P

11. Support, Advice and Communication

- 11.1 Information and advice regarding this policy can be obtained from the DSL/P
- 11.2 Employees requiring personal support due to a disclosure or investigation will receive support from the Human Resources department.
- 11.3 This policy is available on the National Star intranet.

Appendix 2:

12. Preventing Extremism & Radicalisation Procedure

12.1 Introduction

National Star is committed to providing a secure environment for service users where they feel safe and are kept safe. All employees at National Star recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for service users or not.

National Star's Preventing Extremism and Radicalisation Safeguarding procedure also draws upon the guidance contained in the 'Keeping Learners Safe' guidance. The document also considers advice from the Government's 'Prevent Duty Guidance for England and Wales'.

12.2 National Star Ethos and Practice

When operating this procedure National Star uses the following accepted Governmental definition of extremism which is:

'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'.

There is no place for extremist views of any kind in our organisation, whether from internal sources – service users, employees, or external sources. Our service users see our organisation as a safe place where they can explore controversial issues safely and where our employees encourage and facilitate this – we have a duty to ensure this happens.

As an organisation we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for our service users and so should be addressed as a safeguarding concern as set out in the National Star Prevent flow chart. We also recognise that if we fail to challenge extremist views, we are failing to protect our service users.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of our service users. Education is a powerful weapon against this, equipping young people with knowledge, skills and critical thinking, to challenge and debate in an informed way. Therefore, at National Star we will provide a broad and balanced curriculum, delivered by skilled professionals, so that our service users are enriched, understand and become tolerant of differences and diversity and also to ensure that they thrive, feel valued and are not marginalized.

Furthermore, we are aware that our service users can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times service users may themselves reflect or

display views that may be discriminatory, prejudiced or extremist, including using derogatory language.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by service users or employees will always be challenged and, where appropriate, dealt with in line with the National Star Behaviour Policy for service users and the National Star Conduct Policy for employees.

As part of wider safeguarding responsibilities National Star employees will be alert to:

- Disclosures by service users of their exposure to extremist actions, views or materials of others outside of the organisation, such as in their homes or community groups, especially where service users have not actively sought these out.
- Service users accessing extremist material online, including through social networking sites.
- Family / care giver reports of changes in behaviour, friendship or actions and requests for assistance.
- Partner organisations, local authority services, police reports of issues affecting service users in other settings.
- Service users voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with National Star equality policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others, such as Anti-Western or Anti-British views.

Our organisation will closely follow any locally agreed procedure as set out by the Local Authority for safeguarding individuals vulnerable to extremism and radicalisation.

12.3 Teaching Approaches

We will all strive to eradicate the myths and assumptions that can lead to some service users becoming alienated and disempowered, especially where the narrow approaches service users may experience elsewhere may make it harder for them to challenge or question these radical influences.

We will ensure that all of our teaching approaches help our service users build resilience to extremism and give service users a positive sense of identity through the development of critical thinking skills. We will ensure that all our employees are equipped to recognise extremism and are skilled and confident enough to challenge it.

We will be flexible enough to adapt our teaching approaches, as appropriate, to address specific issues in order to become even more relevant to the current issues of extremism and radicalisation. In doing so we will apply the following methodologies:

- Making a connection with service users through good teaching and a person-centred approach.
- Facilitating a 'safe space' for dialogue.

- Equipping our service users with the appropriate skills, knowledge, understanding and awareness for resilience.

Therefore, this approach will be embedded within the ethos of our organisation so that service users know and understand what safe and acceptable behaviour is in the context of extremism and radicalisation. This will work in conjunction with our organisation's approach to the spiritual, moral, social and cultural development of service users.

Our goal is to build mutual respect and understanding and to promote the use of dialogue, not violence, as a form of conflict resolution. We will achieve this by using a curriculum that includes:

- Citizenship programmes.
- Open discussion and debate

We will also work with local partners, families and communities in our efforts to ensure our college understands and embraces our local context and values in challenging extremist views and to assist in the broadening of our service users' experiences and horizons. We will help support service users who may be susceptible to such influences as part of our wider safeguarding responsibilities and where we believe a student is being directly affected by extremist materials or influences, we will ensure that that student is offered mentoring. Additionally in such instances our college will seek external support from the Local Authority and/or local partnership structures working to prevent extremism.

12.4 Whistleblowing

Where there are concerns of extremism or radicalisation, service users and employees will be encouraged to make use of our internal systems, to whistleblow or raise any issue in confidence. Please refer to National Star's Whistleblowing Policy for the full procedural framework on our whistleblowing duties.

12.5 Safeguarding

Please refer to National Star's Safeguarding policy for the full procedural framework on our Safeguarding and Child Protection duties.

Employees will be alert to the fact that whilst extremism and radicalisation is broadly a safeguarding issue, there may be some instances where a service user may be at direct risk of harm or neglect. For example, this could be due to a service user displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with, or employees may be aware of information about a student's family that may equally place a student at risk of harm. (These examples are for illustration and are not definitive or exhaustive).

Therefore, all adults working within the organisation (including visitors, agency staff and contractors) are required to report instances where they believe a student may be at risk of harm or neglect to the nominated Safeguarding Co-ordinator in the service location, who will liaise with the DSL/P, Safeguarding Practitioner, Deputy DSL/P or on-call Manager as appropriate.

Our Safeguarding reporting arrangements are set out fully in our Safeguarding Policy.

12.6 Role of National Star Board of Governors

The National Star Board of Governors will undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities, including their statutory safeguarding duties.

The National Star Board of Governors will support the ethos and values of our organisation and will give support in tackling extremism and radicalisation.

In line with the provisions set out in 'Keeping Learners Safe' the National Star Board of governors will challenge the organisation's senior management team on the delivery of this policy and monitor its effectiveness.

12.7 Review

The Preventing Extremism & Radicalisation Procedure will be reviewed in September 2027 or in line with changes to legislation.

National Star Safeguarding Procedures

1. General Principles of Safeguarding

- It is the responsibility of everyone within National Star to protect children and adults (service users) at risk of abuse or neglect, including online.
- This includes children, young people and adults from outside of National Star who are using our settings.
- Staff should remain vigilant at all times.
- Staff should not assume that someone else will take action.
- Staff must always act in the interest of the child or adult at risk.
- The General Data Protection Regulation (GDPR) and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping people safe.
- Where possible, consent should be sought from the individual before information is shared, however information can be shared without consent to keep an individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional wellbeing.

2. Definitions

2.1 Safeguarding children

Child: A person who is under 18 years of age.

Safeguarding: Safeguarding and promoting the welfare of children involves:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Department for Education
(Working Together to Safeguard Children 2023)

2.2 Safeguarding adults

Adult: A person who is aged 18 years or over

Safeguarding: Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect.

Safeguarding duties apply to an adult who:

- has needs for care and support (whether or not the local authority is meeting any of these needs) and
- is experiencing, or at risk of, abuse or neglect and
- as a result of these care and support needs, are unable to protect themselves

from either the risk of, or the experience of abuse or neglect.

Department of Health
(Care Act 2014 Care and Support Statutory Guidance)

The aims of adult safeguarding are to:

- Stop abuse or neglect wherever possible.
- Prevent harm and reduce the risk of abuse or neglect to adults with care and support needs.
- Safeguard adults in a way that supports them in making choices and having control about how they want to live.
- Promote an approach that concentrates on improving life for the adults concerned.
- Provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult; and address what has caused the abuse or neglect.
- In preventing or minimising the risk or experience of abuse or neglect of an adult, staff must promote the adult's wellbeing including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

3. National Star staff with specific safeguarding duties

3.1 National Star staff with responsibility for safeguarding and child protection:

- Marina Wheale: Head of Safeguarding/Designated Safeguarding Person (DSP)
- John Mann: Deputy Designated Safeguarding Person (DDSP)
- Erin Murray: Safeguarding Governor

3.2 National Star staff with responsibility for Allegations Management:

- Lynette Barrett: Chief Executive Officer
- Marina Wheale: Head of Safeguarding/DSP
- Rachel Harber – Director of People

3.3 Governor with responsibility for Allegations Management:

- Nikki Richardson – Chair of Governors.

4. How to recognise abuse of children, young people or adults at risk

- To recognise signs and symptoms of abuse staff must be open to the possibility of non-accidental injury or other forms of abuse, neglect or exploitation and share any concerns with the National Star safeguarding staff or a senior manager.
- Staff should think, 'it could happen to a National Star service user and 'it could happen here'. Staff should not assume that someone else will take action.
- All staff should be able to reassure victims of abuse, neglect or exploitation that they are being taken seriously and will be supported. No service user should ever be made to feel ashamed or that they are creating a problem by reporting abuse, neglect, exploitation, sexual harassment or sexual violence.

- All staff should be prepared to identify individuals who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life.
- All staff should be aware of the process for making family help assessments, including the criteria for referring a person for targeted early help or support for social care services.
- Staff must be alert to the signs of abuse, neglect and exploitation, including what signs to be aware of when supporting individuals with disabilities

5. Specific Safeguarding Issues and Recognised Forms of Abuse

- Abuse comes in many forms. The following is not an exclusive list, and the signs and symptoms do not necessarily indicate abuse. Staff should also be aware of and report any conversations that they may overhear or have reported to them by a friend of the service user. If appropriate, staff should inform the service user involved in the safeguarding concern that a report has been made.
- Incidents of abuse may be one-off or multiple and affect one person or more.
- When considering the abuse and harm of children it is important to understand that harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

5.1 Type of Abuse

Category of abuse	Definition	Potential Signs and Symptoms
Physical	Deliberately hurting a person causing injuries such as bruises, broken bones, burns or cuts.	Bumps and bruises don't always mean someone is being physically abused. Everyone can have an accident, trip or fall. However, if a person regularly has injuries, there seems to be a pattern to the injuries or the explanation doesn't match the injuries, then this should be reported. Physical abuse can include hitting, slapping, punching, kicking, hair-pulling or pushing. It can also include inappropriate or unlawful use of restraint, including restricting a person's movement. Signs include bruising (a one off or pattern), broken or fractured bones, burns or scalds,

		bite marks and injuries inconsistent with the person's lifestyle. It can also include other injuries and health problems, such as scarring, the effects of poisoning, such as vomiting, drowsiness or seizures, or breathing problems from drowning, suffocation or poisoning.
Sexual	Sexual abuse is when a person is forced or persuaded to take part in sexual activities, not necessarily involving violence. It includes physical contact, including assault by penetration and non-contact activities such as involving the child or adult at risk in looking at, or in the production of, sexual images, watching sexual activities, encouraging the person to behave in sexually inappropriate ways, exposing or flashing genitals at a person or grooming a person in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.	Staff should be aware of the possible health needs that might arise following a sexual assault, such as physical, mental and sexual health problems. Signs may include: • Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck • Torn, stained or bloody underclothing • Bleeding, pain or itching in the genital area • Unusual difficulty in walking or sitting • Foreign bodies in genital or rectal openings • Infections, unexplained genital discharge, or sexually transmitted diseases • Pregnancy in a woman who is unable to consent to sexual intercourse • The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude • Incontinence not related to any medical diagnosis • Self-harming • Poor concentration, withdrawal, sleep disturbance • Excessive fear/apprehension of, or withdrawal from, relationships • Fear of receiving help with personal care • Reluctance to be alone with a particular person Signs of online abuse may include:

		• Spending a lot more or a lot less time than usual online, texting, gaming or using social media • Seeming distant, upset or angry after using the internet or texting • Being secretive about who they're talking to and what they're doing online or on their mobile phone • Behaving as though they have to be online at a certain time, or rushing to get on their phone • Having lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet • Expressing the need for money, this may be used if they are being blackmailed.
Serious Violence (including child criminal exploitation, county lines and modern slavery)	Serious violence is when a person is at risk from, or involved with, serious violent crime where they are threatened with violence or violence is used to intimidate and punish victims and their families. It can involve weapons, including knives and firearms	• Regularly going missing • Travelling to unfamiliar locations. • Noticing money, clothes, accessories or mobile phones they've received and them being unable to explain why or where they came from. • Having several mobile phone handsets or sim cards.
Child Sexual Exploitation (CSE)	CSE is a type of sexual abuse. Children and adults at risk in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.	• Unhealthy or inappropriate sexual behaviour. • Being frightened of some people, places or situations. • Being secretive. • Changes in mood or character. • A sudden change in their family relationships/dynamics. • Having money or things they can't or won't explain, such as hotel key cards or unexplained gifts. • Physical signs of abuse, like bruises or bleeding in their genital or anal area. • Sudden changes in physical appearance including clothes and hygiene levels.

		• Alcohol or drug misuse. • Sexually transmitted infections. • A sudden and urgent request to go onto contraception or to obtain the 'morning after pill'. • Pregnancy.
Emotional or Psychological Abuse	The ongoing emotional maltreatment of a person. It is sometimes called psychological abuse and can seriously damage a person's emotional health and development.	• Withdrawal or change in the psychological state of the person • Insomnia • Low self-esteem • Uncooperative and aggressive behaviour • A change of appetite, weight loss/gain • Signs of distress: tearfulness, anger • Apparent false claims, by someone involved with the person, to attract unnecessary treatment • Use of language you wouldn't expect them to know for their age • Struggling to control their emotions
Financial or Material Abuse	Financial or Material abuse is limiting access to money or other resources, using a person's money for their own gain or by forcing all financial responsibility onto their victim while limiting their ability to provide this.	• Missing personal possessions • Unexplained lack of money or inability to maintain lifestyle • Unexplained withdrawal of funds from accounts • Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity • Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so • The person allocated to manage financial affairs is evasive or uncooperative • The family or others show unusual interest in the assets of the person • Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA • A lack of clear financial accounts held by a care home or service

		• Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person.
Neglect or Acts of Omission	Neglect and acts of omission include ignoring medical, emotional or physical care needs, failing to provide access to appropriate health, care and support or educational services, and the withholding of the necessities of life, such as medication, adequate nutrition and heating.	• Poor environment – dirty or unhygienic • Poor physical condition and/or personal hygiene • Pressure sores or ulcers • Malnutrition or unexplained weight loss • Untreated injuries and medical problems • Inconsistent or reluctant contact with medical and social care organisations • Accumulation of untaken medication • Uncharacteristic failure to engage in social interaction • Becoming clingy • Becoming aggressive • Being withdrawn, depressed or anxious • Missing college • Showing signs of self-harm
Discrimination	Treating a person unfairly because of who they are or because they possess certain characteristics i.e. a disability.	• The person appears withdrawn and isolated • Expressions of anger, frustration, fear or anxiety • The support on offer does not take account of the person's individual needs in terms of a protected characteristic
Online abuse	• The use of electronic communication to bully a person, typically by sending messages of an intimidating or threatening nature. • Can include sharing nude images, the creation of deepfakes, viewing pornography and content relating to misogynistic influencers, simulated harmful online AI interactions and making, sending or receiving self-	• Feeling overly anxious • Self-harming • Difficulty with eating • Suicidal thoughts • Spending a lot more or a lot less time than usual online, texting, gaming or using social media • Appearing distant, upset or angry after using the internet or texting • Being secretive about who they're talking to and what they're doing online or on their mobile phone • Having lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.

	generated intimate images using AI • National Star use a robust web filtering system to support service users to keep safe online.	
Domestic Abuse	Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. Children witnessing domestic abuse can also be subjected to emotional abuse.	• Low self-esteem • Feeling that the abuse is their fault when it is not • Physical evidence of violence such as bruising, cuts, broken bones • Verbal abuse and humiliation in front of others • Fear of outside intervention • Damage to home or property • Isolation – not seeing friends and family • Limited access to money • isolation
Honour Based Abuse	A form of domestic abuse which is perpetrated in the name of so called 'honour'. The honour code which it refers to is set at the discretion of male relatives and women who do not abide by the 'rules' are then punished for bringing shame on the family.	• Sudden absence from college • Prolonged foreign travel • The person having their technology or other means of communication withdrawn • The person being constantly chaperoned • Changes in behaviour • Physical injuries.
Female Genital Mutilation (FGM)	A procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.	• Being in constant pain • Repeated infections • Unexplained bleeding, cysts and abscesses • Problems peeing or holding pee in (incontinence) • Problems during labour and childbirth, which can be life-threatening for mother and baby • Depression • Anxiety • Flashbacks to the time of the cutting • Nightmares and other sleep problems • Post-traumatic stress disorder

		• Self-harm
Self-Neglect	When a person, by choice or lack of awareness or ability, disregards their health. It can also include when a person refuses care that is needed or help with daily activities.	• Very poor personal hygiene • Unkempt appearance • Lack of essential food, clothing or shelter • Malnutrition and/or dehydration • Living in squalid or unsanitary conditions • Neglecting household maintenance • Hoarding • Collecting a large number of animals in inappropriate conditions • Non-compliance with health or care services • Inability or unwillingness to take medication or treat illness or injury
Organisational Abuse	Includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment.	• Lack of flexibility and choice for people using the service • Inadequate staffing levels • People being hungry or dehydrated • Poor standards of care • Lack of personal clothing and possessions and communal use of personal items • Lack of adequate procedures • Poor record-keeping and missing documents • Absence of visitors • Few social, recreational and educational activities • Public discussion of personal matters • Unnecessary exposure during bathing or using the toilet • Absence of individual care plans • Lack of management overview and support
Modern Slavery	When a person is forced to work through mental or physical threat. Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse. Dehumanised, treated as a commodity or bought and sold as 'property'. Physically	• Signs of physical or emotional abuse • Appearing to be malnourished, unkempt or withdrawn • Isolation from the community, seeming under the control or influence of others • Living in dirty, cramped or overcrowded accommodation and or living and working at the same address • Lack of personal effects or identification documents • Always wearing the same clothes

	constrained or have restrictions placed on his/her freedom	• Avoidance of eye contact, appearing frightened or hesitant to talk to strangers • Fear of law enforcers
Radicalisation	The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.	• Being secretive about who they've been talking to online and what sites they visit • A move from expressing moderate views to following more extreme views • A sudden conviction that their religion, culture or beliefs are under threat and treated unjustly • A conviction that the only solution to this threat is violence or war • Lack of feeling of belonging or a desperate need to find acceptance within a group • Displaying intolerant views to people of other races, religions or political beliefs
Sexual Harassment, Sexual Violence, Harmful Sexual Behaviour and Up-skirting	Sexual violence is any unwanted sexual act or activity. There are many kinds of sexual violence, including but not restricted to: rape, sexual assault, child sexual abuse, sexual harassment, rape within marriage / relationships, forced marriage, honour-based violence, female genital mutilation, trafficking, sexual exploitation, and ritual abuse. Sexual harassment is any unwanted behaviour of a sexual nature that you find offensive, or which makes you feel distressed, intimidated or humiliated. Harmful sexual behaviour is problematic, abusive and violent behaviour that is developmentally inappropriate and may cause developmental damage.	• Experiencing flashbacks • Having difficulty sleeping and night terrors • Feeling anxious • Finding it difficult to concentrate • May block out the memory and/or avoid remembering what happened • Difficulties trusting people

	Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear).	
Mental Health	Mental health includes emotional, psychological, and social well-being. It affects how we think, feel, and act. It also helps determine how we handle stress, relate to others, and make choices.	• Ongoing low mood or lack of motivation • Not enjoying things they used to like doing • Becoming withdrawn and spending less time with friends and family • Experiencing low self-esteem or feeling like they are 'worthless' • Feeling tearful or upset regularly • Changes in eating or sleeping habits. • Becoming socially withdrawn and Avoiding spending time with friends or family • Feeling nervous or 'on edge' a lot of the time. • Self-harming

6. Incidents between service users (Child-on-Child or Peer-on-Peer Abuse) – Safeguarding or behaviour?

In line with Keeping Learners Safe, National Star has a duty to protect service users against child on child (peer-on-peer in the case of over 18's) abuse. There are many forms of abuse that can occur between peers, such as; physical abuse (particularly serious physical assault and harm, and the threat of harm with a weapon), sexually harmful behaviour/sexual abuse, bullying, cyber bullying, sexting, upskirting, initiation/hazing, sexual violence and sexual harassment and prejudiced behaviour.

All concerns around child-on-child or peer-on-peer abuse must be reported to the Emotional Wellbeing and Safeguarding teams via a Behaviour Observation Incident Report (BOIR). Several factors will be taken into consideration prior to appropriate next steps being formulated. Particular attention will be paid to how National Star are managing specific situations and whether there is a requirement for increased service user support or a change to support plans to reduce or stop certain behaviours. All staff recognise child-on-child and peer-on-peer abuse as safeguarding risks to both the victim and alleged perpetrator, and understand that this is preventable with "timely,

evidenced based support” preventing the individual from going on to commit abuse or violence.

Prior to requesting the support of outside agencies, consideration will be given to whether the service user is deemed at ‘risk of significant harm’. In the case of allegations of sexual abuse and sexting (involving service users under the age of 18 years), support from the police will be sought immediately and reported to the relevant Safeguarding Team.

The thresholds for physical abuse would be either persistent intentional harm, even if it does not cause significant or long-lasting injury to the service user, and which the organisation is unable to manage successfully, and/or intentionally leaving a mark or breaking the skin of another service user. Persistent bullying of service users that cannot be managed successfully internally, and where there is a significant impact on the emotional wellbeing and mental health of the service user, will also be reported to relevant agencies.

The requirements for each incident will be carefully considered by the Safeguarding Team and relevant staff. The outcome may differ depending on the circumstances and the needs of each service user.

Persistent unintentional physical harm should continue to be reported to the Safeguarding Team using a significant event form, downloadable from the safeguarding page on the intranet and, while these will be handled internally, there will be a clear emphasis on how staff can support in reducing these incidents.

National Star has a zero-tolerance approach to child-on-child and peer-on-peer abuse. The organisation recognises that even if there are no reported cases, this does not mean it is not happening. Staff will remain vigilant, and report concerns immediately.

7. Low-level Concerns and Allegations

Low-level concerns and allegations are those that do not meet the ‘threshold for harm’ (i.e. may not be reported to external agencies such as social care or the police).

All low-level concerns must be reported to the Safeguarding Team and will be appropriately investigated.

Staff should feel confident to self-refer if they have found themselves in a situation which might be misinterpreted, or they have behaved in a way that falls below professional standards.

A low-level concern is any concern that an adult has acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is not considered serious enough to refer to the Local Authority Designated Officer (LADO).

Examples of low-level concerns could include:

- Being over-friendly with service users
- Having favourites

- Taking photos of service users on their personal mobile phones
- Engaging with a service user one-to-one in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language whether this be with sinister intent or in jest/banter

8. How to respond to a disclosure, allegation or concern for a National Star service user

Disclosure: A service user states they have been or are being abused by another person, this includes online activity.

Allegation: A member of staff (including agency staff), governor, trustee, contractor or volunteer working with children or adults at risk is accused of committing abuse.

It is the responsibility of staff, including volunteers, to report concerns not to decide whether it is or is not abuse.

The need to protect the service user at risk overrides any concerns about “false allegations”; even if you think a disclosure or allegation may be untrue you must still report it.

Abuse is usually discovered in three ways:

- The service user makes a disclosure or allegation to someone that abuse has or may have occurred.
- Someone sees the abuse occur.
- Someone identifies signs and symptoms that may indicate abuse.

These principles are to be followed in all cases of disclosure or alleged abuse.

If you receive a disclosure or an allegation is made to you including concerns around online activity, the following steps should be taken:

Respond

- Do not promise to keep it a secret
- Do not react – try not to show shock, disgust or disbelief
- Listen patiently and closely
- Only seek to clarify essentials – what, where, when, who
- Do not question the service user about the incident – do not ask leading questions (any further questioning by staff could affect the validity of any statement collected by police at a later date).
- Do not make promises about the future or statements that are incorrect.

Assist

- If necessary, ensure the service user receives medical treatment.
- Seek to ensure the service users safety.
- Always encourage and allow the service user to take any next steps on their own.
- Provide appropriate support to the service user’s needs and agree a course of

action.

Preserve

- Do not confront the alleged perpetrator.
- If the abuse happened recently do not allow any access to any place where the abuse may have occurred.
- Look after any items given to you – place them in a clean plastic bag.

Record

- Record what you see and what you are told as soon as possible or during the disclosure if appropriate – include the person's wishes about what action to take
- Use the alleged victims own words.
- Cross out mistakes; do not use correction fluid.
- All notes should be timed, dated and signed, with name printed alongside the signature, by the member of staff making the notes.

Report

In the case of a disclosure:

- Report to the DSP, the Safeguarding Co-ordinator, Safeguarding Practitioner or a Deputy Safeguarding Person within 2hrs.
- In the absence of the DSP, Safeguarding Co-ordinator, Safeguarding Practitioner or Deputy DSP, report the matter to the on-call senior manager within 2hrs if you believe the on-call senior manager may need to take some action.
- If you believe some action may be needed and the DSP, Safeguarding Co-ordinator, Safeguarding Practitioner or a Deputy DSP or on-call senior manager cannot be contacted report to any other senior manager.
- Make a referral to the Safeguarding Team using a Significant Event Form.
- The form must be submitted within 24 hours and will be picked up by the DSP, Safeguarding Co-ordinator, Safeguarding Practitioner or Deputy Safeguarding Lead.
- Pass any notes or other record made of the disclosure to the DSP, Safeguarding Co-ordinator, Safeguarding Practitioner or Deputy DSP.

In the case of an allegation (a complaint against a member of staff including Agency staff, trainee teachers, volunteers or contractors):

Report within 2 hours to:

- Hayley Warren: Safeguarding Co-ordinator
- Marina Wheale: Head of Safeguarding/DSP
- Michelle Hutchesson: Safeguarding Practitioner
- John Mann: Deputy DSP

In the absence of any of the above, report the matter to the on-call senior manager.

If none of the above can be contacted, report to any other senior manager.

Where the allegation is against the DSP, Deputy DSP, Safeguarding Co-ordinator Safeguarding Practitioner or the on-call manager and another of the above is not

available, report to any other senior manager.

If you witness abuse including concerns around online activity:

- Seek to ensure the service user's safety, without endangering yourself
- If necessary, seek medical assistance for the person.
- Report to the Safeguarding Co-ordinator, DSP, Deputy DSP, Safeguarding Practitioner, on-call manager or other senior manager immediately.
- If necessary, contact the police – where someone is at significant risk of harm dial 999.
- Seek to ensure the victim has no contact with the alleged abuser. It may be necessary to inform other staff on duty that there has been an incident, but information passed on to them must be kept to a minimum.

If you have concern that abuse is occurring or has or may have occurred:

- Discuss concerns with the Safeguarding Co-ordinator, DSP, Safeguarding Practitioner or a Deputy DSP as soon as possible, or in their absence with the on-call manager if you believe the on-call senior manager may need to take some action.

9. The Victim's Wishes

When considering what action to take and what provision should be made to protect the service user following a disclosure or a concern being raised, their wishes and feelings should be considered (where appropriate) when determining what action to take and what services to provide. Service users should know that their concerns will be treated seriously and that they can safely express their views.

Staff must not promise confidentiality and must always act in the interests of the victim.

Note: In the case of an allegation, National Star must take action regardless of the victim's wishes.

10. Family / Carer Communication

Any service user that raises or is involved in a safeguarding concern who has capacity will be offered appropriate support to decide whom they wish to be informed (i.e. family/carers).

In the event of a safeguarding concern, families and carers of service users who lack capacity will be contacted at the earliest, most appropriate time - unless the family member or carer is directly implicated in the concern. Communication with families and carers will be regular, open and transparent.

Where a family member or carer holds Deputyship i.e. Health & Welfare / Property and Affairs, information will be shared in accordance with the appropriate authorisation.

11. Confidentiality

National Star will work on a need-to-know basis. However, depending on the nature of

the abuse and the action that may need to be taken the following people may be involved:

- The DSP, Safeguarding Co-ordinator, Safeguarding Practitioner or Deputy DSP
- The Chief Executive
- Human Resources Department
- The Local Authority Safeguarding Team or Local Authority Designated Officer (LADO)
- The victim's social worker or Social Services teams
- The police

Depending on the circumstances, other key staff may be informed; these could include:

- Nursing team / GP
- Service user's Personal Learning Co-ordinators (PLC) or Key Worker
- Other members of the Senior Management Team
- Residential manager and key residential staff
- Counselling / psychology staff

Where a member of staff is the alleged abuser:

- The Human Resources Department
- The member of staff's representative (usually from the union)

All National Star staff are bound by National Star's policy on confidentiality; however, the needs and wellbeing of the person will take precedence over issues of confidentiality.

On this basis, National Star reserves the right in certain circumstances to inform outside agencies even when permission has not been given by the service user, their family or carers.

12. Sharing Information with other Agencies

The right to confidentiality is not absolute. Sharing relevant information with the right people at the right time is vital to good safeguarding practice.

The General Data Protection Regulation (GDPR) and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping people safe.

- It is inappropriate to give assurances of absolute confidentiality in cases where there is a concern regarding abuse and neglect, particularly when there may be others at risk.
- Confidentiality must not be confused with secrecy.
- Sharing information is necessary to protect children, young people and adults at risk of abuse or neglect.
- Early sharing of information is key to providing an effective response.
- No professional should assume that someone else will pass on information.
- Informed consent must be obtained, however if this is not possible or will put the person or others at risk, it may be necessary to override this.

13. Raising alerts of abuse or concerns of abuse

When a disclosure or allegation of abuse or cause for concern is reported within National Star, The Safeguarding Team will:

- Consider whether an alert should be made to the appropriate Local Authority Safeguarding Team or relevant police force
- Report to the police where a concern could potentially lead to willful neglect or ill-treatment of someone who lacks capacity. This includes all concerns regarding care and support needs.
- Be directed by and work with the appropriate Local Authority Safeguarding Team or relevant police force to ensure an open and thorough investigation of the disclosure or allegation.

The 'appropriate Local Authority Safeguarding Team' or 'relevant police force' is the service responsible for the geographical area in which the alleged or suspected abuse occurred.

Note: it is mandatory to report any suspected abuse involving a child or young person under the age of 18 years.

Service users may, on occasion, find themselves in situations that they are not comfortable with or may later regret. The result of these encounters, which may be physical, sexual or emotional, may not technically be termed as abuse or appear to cause significant harm. When incidents of this nature arise, the DSP, Safeguarding Co-ordinator, Safeguarding Practitioner or a Deputy DSP will inform the Local Authority Safeguarding Team and gather evidence, if necessary, to make a judgement about the most appropriate action to take.

14. Prevention of Abuse

National Star firmly believes in prevention and early identification of abuse or its precedents. To this end National Star promotes a safe and open culture.

National Star uses the following systems to support the prevention of abuse:

- Respectful and non-abusive cultures
- Systems and structures within the workplace
- Person-centred care plans, needs and risk assessments, and Key Worker/Learner Journey Co-ordinator relationships
- Inducting new staff
- Team meetings
- Advocacy and the empowerment of service users
- Supervision and ongoing training of staff
- Handovers and reviews

15. Supporting service users and staff following a disclosure or allegation

The organisation can provide support to service users who make a disclosure or allegation and staff who assist service users when they do so to cope with the psychological effects.

Service users will be offered counselling through the Emotional Wellbeing Service.

All allegations will be investigated and where a member of staff is the subject of an allegation information will be shared with them when appropriate. At this time, they will be offered support through the Human Resources Team, Occupational Health and, if a member, through Westfield Health.

16. Professional Disagreement

If you have reported a concern, the Safeguarding team should keep you informed as far as possible about developments and the outcome of the investigation of your concern.

If you do not consider that the concern has been satisfactorily investigated or disagree with the conclusion of the investigation, in the first instance speak with the Safeguarding Co-ordinator, DSP or a Deputy DSP. If after this discussion you remain unsatisfied, speak with the Director or Head of your service area who will take the matter forward on your behalf.

17. Children in Care (CIC)

The relevant departmental manager is responsible for National Star students who are Children in Care and will ensure; the educational achievement of Children in Care is promoted; appropriate staff have the information they need about the Child in Care's legal status and contact and care arrangements. Details of the Child in Care's social worker will be available on StarData. Where possible, the Safeguarding team will hold confidential safeguarding information regarding the Child in Care.

18. Deputyship

Where a family member or carer holds Deputyship i.e. Health & Welfare/Property and Affairs for a National Star service user, relevant information in accordance with the appropriate authorisation and terms of the order will only be provided at the prior request of the Deputy.

National Star should not have direct access to client funds such as receiving benefits/pension or any other sort of income. The organisation recognises that the Deputy is the only person legally authorised to directly manage service user funds.

Where National Star is left with service user funds to provide personal allowance for the service user, the organisation will clearly document the use of these funds and provide relevant information as and when requested by the Deputy, so they are able to present a clear annual report to the Office of the Public Guardian.

19. Children Missing / Absent from Education

All staff should be aware that children and young people going missing or being absent from education, home or care, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, familial and extra-familial abuse, sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and help prevent the risks of a child or young person going missing in future.

Where reasonably possible, the relevant departmental manager should hold more than one emergency contact number for each service user. This goes beyond the legal minimum but is good practice.

The relevant departmental manager is responsible for monitoring the attendance of National Star students to identify and respond to a concern that a child is missing or absent from education.

All staff should adhere to National Star's Missing Child/Young Person's Protocol.

20. Early Help

For children and young people, early help is more effective in promoting the welfare of children than reacting later. Early help means providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

Any child or young person may benefit from early help, but all staff should be particularly alert to the potential need for these services for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs themselves
- Is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

21. Notifying Regulators and Funding Authorities

21.1 Funding Authorities

The funding authority of a service user subject to a safeguarding concern that involves another service user of National Star, or a member of National Star staff, must be informed of the issue within 24hrs of it coming to the attention of National Star.

The DSP, Safeguarding Co-ordinator, Safeguarding Practitioner, Deputy DSP or on-call senior manager will pass relevant details to National Star's Funding Co-ordinator who will make the report to the funding authority.

21.2 Notification to the Care & Social Services Inspectorate (Wales) (CSSIW)

National Star must inform the CSSIW without delay of the occurrence of:

- The death of any service-user
- Serious injury to a service-user
- Abuse or allegations of abuse involving a service-user
- Incidents reported to or investigated by the police

The relevant Registered Manager is responsible for making the notification and must be informed of an incident involving the above.

21.3 Referral to the Disclosure and Barring Service (DBS)

The Safeguarding Vulnerable Groups Act 2006 place a duty on employers of people working with children or adults at risk (adults at risk) to make a referral to the DBS when an employer has dismissed or removed a person from working with children or adults at risk (or would or may have if the person had not left or resigned etc.) even if the person's future employment was not in regulated activity, because the person has:

- Been cautioned or convicted for a relevant offence; or
- Engaged in relevant conduct in relation to children and/or adults at risk [i.e. an action or inaction (neglect) that has harmed a child or adult at risk or put them at risk of harm]; or
- Satisfied the Harm Test in relation to children and/or adults at risk. [i.e. there has been no relevant conduct (i.e. no action or inaction) but a risk of harm to a child or adult at risk still exists].

Relevant offence:

A relevant offence is a serious offence that will, subject to consideration of representations where permitted, automatically bar a person from working with children or adults at risk.

Relevant conduct is conduct (an action or inaction / neglect) that:

- Endangers a child / adult at risk or is likely to endanger a child / adult at risk. A person's conduct endangers a child / adult at risk if they:
 - Harm a child / adult at risk
 - Cause a child / adult at risk to be harmed
 - Put a child / adult at risk, at risk of harm

- Attempt to harm a child / adult at risk
 - Incite another to harm a child / adult at risk
 - If repeated, against or in relation to a child / adult at risk, would endanger the child / adult at risk or be likely to endanger the child / adult at risk
- It can involve:
 - Sexual material relating to children (including possession of such material)
 - Sexually explicit images depicting violence against human beings (including possession of such images)
 - Being of a sexual nature involving a child / adult at risk

The harm test

A person satisfies the harm test if they may have:

- Behaved in a way that has harmed a child / adult at risk or may have harmed a child / adult at risk.
- Possibly committed a criminal offence against or related to a child / adult at risk
- Behaved towards a child / adult at risk in a way that indicates he or she may pose a risk of harm to children or adults at risk

DBS Referral Procedure:

If National Star is made aware an employee has been convicted of a relevant offence the DSL must be advised to consider a referral to the DBS as soon as possible, even if the person is not seeking employment in regulated activity.

Before making other referrals to DBS, National Star will:

- Follow the safeguarding procedures set out above including informing the police and / or making an alert to the appropriate LADO or Adult Safeguarding Service.
- Undertake an investigation to establish if the allegation has foundation.
- Where an allegation has foundation, gather evidence to support the allegation.
- Review the evidence to decide if the criteria for making a referral to the DBS has been met. The DSP and a member of the Human Resources Team will be responsible for conducting the review.
- Provide DBS with supporting evidence of the referral.
- As far as possible, complete the investigations even if the person has left National Star employment.
- If additional relevant information becomes available after making a referral, this will be provided to the DBS.

A member of the Human Resources Team will make the referral to DBS on behalf of National Star.

22. Training

- National Star acknowledges the value of staff training in supporting a respectful and non-abusive culture and in the identification of abuse.
- Everyone joining National Star, in a paid or unpaid capacity, will undergo an

induction which will involve an explanation of the Safeguarding policy and the Guidance for Safer Working Practice (Code of Conduct); introduction to the Safeguarding Co-ordinator, DSP, DDSP and Safeguarding Practitioner, and an explanation of the requirements of their role, in accordance with Keeping Learners Safe.

- All National Star staff will attend training during induction on the identification and prevention of abuse, neglect and exploitation, action in case of a disclosure and reporting and recording (foundation training) and in Safer Working Practice and Boundaries. In addition, all residential staff will undertake induction and foundation training in accordance with Skills for Care Standards.
- All National Star staff will receive refresher training every three years and will receive regular safeguarding updates from the safeguarding team, to ensure their knowledge and skills remain up to date.
- The Safeguarding Co-ordinator, DSP, Safeguarding Practitioner, DDSP and Designated Governor for Safeguarding will undertake Local Authority Multi-Agency training for both Children and Adults every 2 years.

Review of Safeguarding

Staff / Team Meetings

- Safeguarding will be a standing item on the agenda at all staff/team meetings/S&D's/1:1's.
- The chair of the meeting will be responsible for ensuring that:
 - If a safeguarding concern regarding a service user is raised by a member of staff at the meeting, a report of the concern is made to the Safeguarding Co-ordinator, DSP, DDSP or Safeguarding Practitioner.
 - Any matters raised regarding safeguarding, such as risks that have been identified or suggested changes to safeguarding procedure are passed to the DSP or Deputy DSP.

The Safeguarding Strategy Group

The Safeguarding Strategy Group will conduct an overview of the organisation's safeguarding strategy as informed by the work of the Safeguarding Operational Group, changes in legislation and developments in safeguarding practice to ensure that the organisation meets its commitment and duty in relation to safeguarding.

The group meet once each term.

The group is made up of the Governor Safeguarding representative, Chief Executive Officer, Head of Safeguarding (DSP), Safeguarding Co-ordinator and senior members of staff from the organisation.

The Safeguarding Operational Group

The Safeguarding Operational Group is made up of relevant operational heads of

department and is a forum to consider safeguarding requirements at an operational level, discuss relevant case studies to inform next steps, lessons learned and disseminate good practice and significant legislative information to teams. This group actively feeds into the Safeguarding Strategy Group.

The group meet once each term.

23. Contact numbers and further information

To Report a Safeguarding Concern:

safeguarding@nationalstar.org

Teams: Safeguarding

Out of Hours: On-call Manager

To Report an Adult at Risk:

Blaenau Gwent

Tel: 01495 315700

Email: DutyTeamAdultsatrisk@blaenau-gwent.gov.uk

Caerphilly

Tel: 0808 1002500

Email: povateam@caerphilly.gov.uk or IAAAdultsatrisk@caerphilly.gov.uk

Torfaen

Tel: 01495 762200

Email: socialcarecalltorfaen@torfaen.gov.uk

Newport

Tel: 01633 656656

Email: firstcontact.adultsatrisk@newport.gov.uk or pova.team@newport.gov.uk

Monmouthshire

Tel: 01291 638928

Email: MCCadultsatriskafeguarding@monmouthshire.gov.uk

If it is an emergency and you need to make contact outside of office hours, please call the Emergency Duty Team on 0800 3284432

To Report a Child at Risk:

Blaenau Gwent

Tel: 01495 315700

Email: DutyTeam@blaenau-gwent.gov.uk

Caerphilly

Tel: 0808 1001727

Email: contactandreferral@caerphilly.gov.uk

Torfaen

Tel: 01495 762200

Email: socialcarecalltorfaen@torfaen.gov.uk

Newport

Tel: 01633 656656

Email: children.duty@newport.gov.uk

Monmouthshire

Tel: 01291 635669

Email: ChildDuty@monmouthshire.gov.uk

If it is an emergency and you need to make contact outside of office hours, please call the South East Wales Emergency Duty Team on 0800 3284432

Police – 999 / 101

Disclosure and Barring Service - 0300 0200 190 - customerservices@db.s.gov.uk

24. Procedures for DSP/on-call managers in relation to disclosures or causes for concern for National Star service-users

Where a child or adult at risk is in serious danger contact the emergency services via 999 immediately to seek urgent assistance.

On receiving report of disclosure or other cause for welfare concern -

The DSP, Deputy DSP, Safeguarding Co-ordinator or Safeguarding Practitioner will alert a social work practitioner in the appropriate Local Authority Safeguarding Team and seek further advice if required.

Alerts should be made immediately by the DSP, Deputy DSP, Safeguarding Co-ordinator or Safeguarding Practitioner where the concern is about non-consensual touch, physical or sexual abuse, immediate danger to the victim or another or has been reported to the police

Other matters should be reported within 24 hours.

Referrals and concerns should be using the relevant contact details above.

Note: In line with good practice, the referrer should usually, but not exclusively, (and not where this will place the young person at increased risk of significant harm) discuss the matter with the family of a young person and where possible seek their agreement to the referral.

25. Procedure for Senior Manager / Governor with Safeguarding Responsibilities in the case of an allegation or concern about the behaviour of a member of staff (including agency staff, governor, contractor or volunteer)

If an allegation or a concern is received that a member of staff working or volunteering

with a service user has:

- behaved in a way that has harmed a service user, or may have harmed a service user;
or
- possibly committed a criminal offence against or related to a service user;
or
- behaved towards a service user or service users in a way that indicates that person would pose a risk of harm if they work regularly or closely with vulnerable people;

Regardless of where the alleged abuse took place; the Allegations Management Procedures must be implemented.

Note: If it is decided by the Local Authority Designated Officer (LADO) or Adult Safeguarding Team that a Strategy Meeting is to be called, the organisation should not carry out an investigation until the Strategy Meeting has taken place.

The most senior person not implicated in the allegation with responsibility for Allegation Management or, if the complaint is against the Chief Executive Officer, the Governor with Safeguarding responsibilities must be immediately contacted.

They should:

- If a serious criminal offence is disclosed, reported or suspected, inform the police and;
- Ensure a written record is completed
- Inform the Local Authority Designated Office for Allegations (LADO) using the relevant contact details above
- Adult Safeguarding Team using the relevant contact details above
- Follow the advice given by the LADO or Adult Safeguarding Team

The LADO / Adult Safeguarding Team and senior person/governor will decide if the allegation meets the criteria for a strategy meeting based on whether the member of staff has:

- Behaved inappropriately in a way that has harmed or may have harmed a service user; or
- Possibly committed a criminal offence against or related to a service user; or
- Behaved towards a service user in a way that indicates he / she is unsuitable to work with children / young people or adults at risk

Where an allegation is made against another person who is not a member of staff, agency worker, governor, volunteer or contractor at the organisation but who the college has reason to believe is a person who works or is a volunteer with children or adults at risk then the college will inform the LADO or Adult Safeguarding Team.

Disciplinary Procedure

The senior person/governor will take advice from the LADO or Adult Safeguarding Team, however, where there is reasonable suspicion that the allegation is serious and the outcome of an investigation could result in the action being gross misconduct, the organisation will consider suspending the member of staff in accordance with its

disciplinary procedures.

Staff suspension is not in itself a disciplinary action and will be used for the following reasons:

- To protect the service user or others from possible further abuse
- To allow a full investigation without the danger of influence by the member of staff
- To protect the member of staff from further allegations

National Star recognises that this can be a very uncomfortable experience for the member of staff involved and will seek to support that member of staff either through the Human Resources department, Occupational Health Department, if a member, Westfield Health or, if appropriate, an external agency.

Staff are reminded that a member of staff who is suspended is not guilty of anything at that stage, neither should they discuss the issues with others in the organisation. This should be respected and staff returning from suspension should be supported and treated professionally.

The organisation has a statutory duty to refer the individual to the Disclosure and Barring Service where it withdraws permission for an individual to engage in regulated activity, or would have done so had that individual not resigned, retired, been made redundant or been transferred to a position which is not regulated activity because they think that the individual has engaged in relevant conduct, satisfied the Harm Test or received a caution or conviction for a relevant offence.

The DSP will be responsible for ensuring the organisation meets this duty.

Staff with responsibility for Allegations Management:

- Marina Wheale – Head of Safeguarding/DSP
- Lynette Barrett – Chief Executive Officer
- Rachel Harber – Director of People

Governor with responsibility for Allegations Management:

- Nikki Richardson - Chair of Governors

Reviewed by Marina Wheale – July 2026.