

<p style="text-align: center;">WFCA GROUP WEST FAVERSHAM COMMUNITY CENTRE BYSING WOOD ROAD, FAVERSHAM, KENT ME13 7RH</p>	
<p style="text-align: center;">West Faversham Community Association Registered Company No 07296070 Charity Registration No 1139228</p>	<p style="text-align: center;">All The Extras Limited Registered Company No 09062780</p>

Author:	J Browning	Authorised:	Trevor Abram
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Safeguarding Policy

Part 1 General Policy

The West Faversham Community Association Group (the Association) is firmly committed to the belief that all children and vulnerable adults have a fundamental right to be protected from harm and fully recognises its responsibility for child and adult protection. The safety and protection of all vulnerable people that the Association supports is paramount and has priority over all other interests, unless life is at imminent risk.

When considering how it safeguards children and young people the association adopts a child centred approach to safeguarding children. All of the Association's employees, trustees, volunteers and contractors are required to comply with the procedures contained within this policy, and must acknowledge that safeguarding is everyone's responsibility across the organisation.

Due to the nature of the associations work and vulnerability of the people the association works with, the association aims to hold itself to the safeguarding standards of a school/ education establishment, this policy has been developed to achieve this.

This document is informed by 'Keeping Children Safe in Education (2024), Working Together to Safeguard Children (2023), the Kent Safeguarding Children Multi-Agency Partnership (KSCMP), The Prevent Duty (2015), What to do if you suspect a child is being sexually exploited (2012), Statutory Guidance on Children Who Run Away or go Missing from Home or Care (2014), Dealing with Allegations Against Teachers and other Staff (2012), Care Act 2014, Equality Act 2010, Early Years and Foundation Stage Framework 2023 (EYFS), Ofsted guidance "Inspecting safeguarding in Early years, Education & Skills' (2019), Draft Gender Questioning Children 2024.

There are Five main elements to the policy.

1. **Prevention** e.g. positive, supportive and safe culture, opportunities for young people and elderly to engage in a supportive environment, safer recruitment procedures;
2. **Risk – identifying risk factors and areas of context that impact on safeguarding**

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3. **Protection** - by following the agreed procedures, ensuring all staff are trained and supported to report and respond appropriately and sensitively to safeguarding concerns ;
4. **Support** for all users and staff, and where appropriate specific intervention for those who may be at risk of harm;
5. **Working with parents/careers and other agencies** to ensure appropriate communications and actions are undertaken.

The WFCA Designated Safeguarding Lead (DSL) for initial advice is the Chief Executive Officer and this designated lead will make the necessary contacts with statutory services and record such contacts. In his/her absence the responsibility will lie with the Deputy DSL (DDSL) in consultation with the Chair or Vice Chair, the Director of Community Activities will be one of the two named deputy DSLs. The Chief Executive Officer will also be the Prevent Lead.

In the event of an urgent situation occurring where immediate contact with statutory children and vulnerable protection agencies is considered necessary the contact details are:

Concerned about an adult?

Call **03000 41 61 61**

(text relay 18001 03000 41 61 61).

Concerned about a child?

Call **03000 41 11 11**

(text relay 18001 03000 41 11 11)

If you need to contact us outside of normal office hours, for example during the night,
 call **03000 41 91 91**.

**If you think someone is in immediate danger, the best thing to do is
 call 999 for the emergency services. ¹**

¹ Kent County Council advice - <http://www.kent.gov.uk/social-care-and-health/report-abuse>

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Part 2 Definitions

The following definitions apply throughout the Safeguarding Policy and associated Procedures:

Abuse: a form of maltreatment. Somebody may abuse or neglect a child or adult by inflicting harm or by failing to act to prevent harm. Children or vulnerable adults may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others

Child or Children: The Children's Acts 1989 and 2004 defines a child as a person under eighteen, for most purposes.

Young Person: The term young person will include those aged between 5 and 24 years. For the purposes of this policy, a young person aged under 18 years is regarded as a child.

Vulnerable Adult or Adults: A vulnerable adult includes all people aged 18 and over subject to the following criteria: "Over 18 who is or may be in need of community care services by reason of mental or other disability, age, or illness AND who is or may be unable to take care of themselves OR is unable to protect him or herself against significant harm or exploitation"

Examples of a vulnerable adult:

- Is elderly and frail due to ill health, physical disability or cognitive impairment
- Has a learning disability
- Has a physical disability
- Mental health needs including dementia or a personality disorder
- Has a long-term illness/condition
- Is a carer of a friend or family member and is subject to abuse
- Is unable to demonstrate the capacity to make a decision and is in need of care and support

Early Help: Taking action to **support** a child, young person or their family **early** in the life of a problem, as soon as it emerges. It can be required at any stage in a child's life from pre-birth to adulthood, and applies to any problem or need that the family cannot deal with or meet on their own.

Child in Need: This is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and

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development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

Section 47 of the Childcare Act 1989: This chapter provides steps for how to undertake a strategy discussion/meeting with regards to referrals and information sharing.

Designated Safeguarding Lead (DSL): The Designated Safeguarding Lead is specified in the Children Act 2004 and ensures the every organisation has a “named person” for safeguarding children and vulnerable people. Prior to that, the role had frequently been known as the Child Protection Officer. The Designated Safeguarding Person has a responsibility at both a strategic level within the organisation and on a day-to-day basis.

Deputy Designated Safeguarding Lead (DDSL): The DDSL will be trained to the same level as the DSL and will work with the DSL or act in the DSL’s absence.

Abuse: The Children Act 1989 defines four types of abuse: physical, emotional, sexual and neglect. These categories of abuse apply and will be relevant to vulnerable adults as well as to children with whom the Association has contact with as part of its activities.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or vulnerable person.

Emotional abuse: the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and adverse effects on their emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the them opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate

Sexual abuse: involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. The activities may involve physical contact, penetrative or non-penetrative; or non-contact abuse.

Neglect: the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development.

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Part 3 - Understanding risks

Children and young people, due to their maturity are inherently at greater risk of harm, either from peers, themselves or adults. The Association takes a risk informed approach to safeguarding, to us this means we seek to understand the different risks to the young people, within the context of the individual and situation. We have develop our system to identify and protect against developing risks, many of which are outlined within the policy, however the risks that young people face is ever changing. The association aim is to have a culture of safeguarding, delivered through care and curiosity that enables our practitioners to asses risks to young people and highlight concerns beyond that of the defined abuse types.

Staff should also be aware of other factors that influence these forms of abuse such as racial or homophobic abuse, and the context for the young people they work with.

The Association acknowledges that this policy recognises a range of safeguarding issues including (but not limited to):

- Bullying (including cyberbullying)
- Children with family members in prison
- Children and the court system
- Children missing education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (County Lines)
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based abuse and violence against women and girls
- Hate
- Honour based abuse
- Human trafficking and modern slavery
- Mental health
- Missing children and adults

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- Online Safety
 - Child on child abuse
 - Prevent Radicalisation and Extremism
 - Private fostering
 - Relationship abuse
 - Sexual violence and sexual harassment between children
 - Upskirting
 - Youth Produced Sexual Imagery or “Sexting”

(Also see Annex A within ‘Keeping children safe in education’ 2024)

WFCA recognises that children or vulnerable adults experiencing specific safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will be approached and responded to in the same way as protecting children from any other risks.

Within our context there are forms of abuse that are young people have a higher risk of exposure to and additional guidance for our team has been developed, these detailed below;

Self harm

Young people can self harm for several reasons, and it is important to not equate self harm to attention seeking. There is always a cause of self harm and identifying and addressing this is important.

It is important that young people feel safe at our centres and have trusted adults they can talk to, this is key to being able to support young people at a time of crisis.

When young people present with self harm, staff will deal with an injuries and provide emotional support. All instances will be logged in our reporting system, for review by a DSL. If a young person has caused serious harm resulting in hospital treatment the association must report this to the front door and not rely on Police/NSH reporting.

Staff will work with young people and parents to develop a tailored response to self harm for young people. Staff will always give advice around reducing risk when harming such as using clean objects, however balance this with being clear that self harm is not the best rote to managing the issue the young person has.

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The team will work with young people to identify the causes of the need to harm and identify safer coping methods, this will always include the centre being a safe place to turn to.

Child Sexual Exploitation

Introduction

*Child sexual exploitation is when people use the power they have over young people to sexually abuse them. Their power may result from a difference in age, gender, intellect, strength, money or other resources.*¹ Sexual abuse covers penetrative sexual acts, sexual touching, masturbation and the misuse of sexual images – such as on the internet or by mobile phone.

The Association acknowledges there is a significant risk amongst local young people and volunteers of child sexual exploitation owing to the higher level of deprivation experienced in the area of the Associations' activities. The Association aims to ensure this risk is minimised or removed at all opportunities.

This policy section has been developed from "Keeping Children Safe in Education (Sept 2024)", "Working Together to Safeguard Children (March 2019)" and "What to do if you suspect a child is being sexually exploited (2012)"

Sexual exploitation and the law

It is important to understand what is meant by the age of consent (the age at which it is legal to have sex). This is 16 for everyone in the UK. Under the age of 16, any sort of sexual touching is illegal. It is illegal to take, show or distribute indecent photographs of children, or to pay or arrange for sexual services from children. It is also against the law if someone in a position of trust (such as a teacher) has sex with a person under 18 that they have responsibility for.

Our Ethos and Environment

West Faversham Community Association will always aim to ensure that the environment is conducive to free and open discussion amongst service users and staff. The aim of this environment is to ensure children are comfortable and feel able to express themselves in safety.

Training

All staff and volunteers (whose work puts them in contact with children), will receive training on the signs of child sexual exploitation, which will be refreshed on an annual basis.

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The Lead Practitioners, Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will receive training in child exploitation appropriate and sufficient to enable them to carry out child exploitation training for other staff and volunteers.

Vigilance

Those working in childcare settings will ensure they are vigilant in noticing children leaving the setting for short periods of times, leaving early, receiving expensive gifts, or other possible signs of exploitation and in reporting any such concerns without delay.

Reporting

Any issues or concerns will be reported to the Designated Safeguarding Lead regardless of the amount of evidence. These will then be reviewed by the DSL or DDSL in conjunction with any other information and, where appropriate or necessary to address any immediate risk, these will be referred to Kent Safeguarding Children's Multi-Agency Partnership (KSCMP) with reference to the KSCMP thresholds.

A case file will be prepared and all the Designated Safeguarding Leads will be made aware of the issue/s in ways that protect confidentiality and the child. Where an imminent risk to a child is identified the police will also be informed.

Responding

As with all safeguarding issues, the Association will ensure effective reporting is carried out to safeguarding the young person, while also ensuring the young person is supported to be safe. It is crucial to remember these young people are victims, and need high levels of support.

County Lines and Child Criminal Exploitation

County Lines is the police term for urban gangs exploiting young people into moving drugs from a hub, normally a large city, into other markets - suburban areas and market and coastal towns - using dedicated mobile phone lines or "deal lines". Children as young as 12 years old have been exploited into carrying drugs for gangs. This can involve children being trafficked away from their home area, staying in accommodation and selling and manufacturing drugs. This can include:

- Airbnb and short term private rental properties
- budget hotels

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- the home of a drug user, or other vulnerable person, that is taken over by a criminal gang- this may be referred to as cuckooing.

Organised criminal gangs groom children and young people because they're less suspicious and are given lighter sentences than adults.

Exploiting a child into committing crimes is abusive. Children who are targeted can also be groomed, physically abused, emotionally abused, sexually exploited or trafficked. However, as children involved in gangs often commit crimes themselves, sometimes they aren't seen as victims by adults and professionals, despite the harm they have experienced. It's important to spot the signs and act quickly if you think a child is being groomed or is becoming involved with a gang.

Staff training will cover signs and how to respond to concerns of CSE & CCE. The association will work to ensure our culture sees children in these circumstances as victims in need of support not perpetrators of crime. Local level support plans will be put in place wherever possible to support young people not meeting threshold for local authority support.

A child or young person might be recruited into a gang because of where they live or because of who their family is. They might join because they don't see another option or because they feel like they need protection. Children and young people may become involved in gangs for many reasons (see Appendix 5)

The team carrying out our intervention work, with the support of the strat team, will use the CCE toolkit to identify any risks to the young people, and keep this under regular review. The Strat team may also use this for young people of concern highlighted by session debriefs and concerns reporting.

Managing others wellbeing

Many young people take on pressures of holding the stress of other young people's wellbeing needs. This can impact their capacity to manage their own wellbeing and will at times result in them compromising their own wellbeing for the benefit of others. This can escalate to self emotional abuse.

Our teams will be proactive in identifying this and have upfront and honest conversations with young people to ensure they are able to see the impact that others wellbeing may be having on their own and support them in putting in place boundaries.

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FGM

The Association understands its responsibility to protect children and vulnerable people from all kinds of harm, including those that may result from cultural practices such as FGM.

The Association will ensure all staff working in a child care setting are made aware of the circumstances in which a child or vulnerable adult may be at risk of FGM being likely to occur or have to occurred and how to report it. All staff practitioners will be made aware of the statutory responsibility to report FGM.

Annual training will include signs and symptoms of FGM.

Honour based Violence

Practitioners are to be made aware that ‘Honour-based’ violence (HBV) encompasses a range of crimes which could be committed to protect or defend the honour of the family and/or the community.

The indicators of HBV and associated factors will be covered with staff within the associations safeguarding training. All members of staff are alert to the possibility of a child being at risk of HBV, or already having suffered HBV. All members of staff are aware that all forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. Staff will speak with DSL if they are concerned about HBV.

Harmful sexual behaviour

The association acknowledges the complexity of the sexual development of young people, and that within its settings it has a wide range of ages for which normal sexual behaviour would vary.

The Association follows the NSPPC and Hackett guidance on sexual behaviour, and uses the tools to asses if sexual behaviour is age appropriate and/or harmful.

The team should identify any sexual behaviour by young people and log it as concerns or incidents, DSL will then working with the team will assess if behaviours shown by young people are developmentally expected for their age or if further support is needed. The DSLs will use the *Brook traffic light tool*, to asses based on the young person age if the behaviours are Green, Amber or Red. The assessment will be used alongside the CPOMS case file to

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allow DSLS to explore patterns and give context for the young people involved, this will enable the DSLS to give the incident(s) a category from the Hackett guidance and produce a suitable response plan, which will be communicated with the young person, parents and team.

Normal – to be backed up with positive messaging and good challenge, to ensure actions remain safe and do not escalate.

Inappropriate - Behaviours in this category will usually be managed internally, thought good challenge by the team, discussions around behaviours and supportive guidance. Depending on the situation this may result in conversations with parents.

Problematic – Behaviours in this category will always result in communication with parents and where the threshold is met a referral to SCS. Well planned internal support for these young people is to be a key element of the response.

Abusive – This category should not be internally managed, and will always result in a referral to SCS and police as appropriate

Violent – This category will always result in a referral to SCS and the police.

When a serious sexual offence is committed, the DSLs will take all guidance from the Police.

It is important that when developing response plans, even to the most serious incidents, to remember, that a young person alleged of carrying out a sexual offence is also likely to be a victim themselves and require support. The Association will be diligent in ensuring both accused and victims are given appropriate support.

‘Upskirting’ is a criminal offence and will not be tolerated. It typically involves someone taking a picture under a person’s clothes without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Peer Abuse & Sexting

WFCA and its team recognise that children are capable of abusing their peers. Child on child abuse can take many forms, including (but not limited to) bullying, cyberbullying, gender-

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based abuse, hazing (initiation type violence), sexually harmful behaviour and violence and 'sexting'. Leadership and practitioners are to be mindful that some potential issues may be affected by the gender, age, ability and culture of those involved.

WFCA believes that all abuse is abuse and it will never be tolerated, dismissed or minimised, even if intended as "banter" or "having a laugh". Any incidents of child on child abuse will be managed in the same way as any other safeguarding concern and will follow the same procedures.

Our practitioners will use appropriate challenge to ensure banter and messing around is not and does not escalate to being child on child abuse.

'Sexting' (Youth Produced Sexual Images) will not be tolerated. WFCA will respond to cases of "sexting" in line with UKCCIS "Sexting in Schools and Colleges" guidance and in line with Kent Safeguarding Children Multi-agency Partnership (KSCMP) guidance.

Young people who experience child on child abuse will be supported by:

- Offering them an immediate opportunity to discuss the experience with a member of staff of their choice to facilitate providing reassurance and continuous support
- Concerns will be recorded with discussions regarding how to respond to concerns and build resilience
- Working with the wider community and local/national organisations to provide further or specialist advice and guidance if needed

Domestic abuse

Domestic abuse is any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass, but is not limited to, psychological; physical; sexual; financial; and emotional.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Domestic abuse affecting young people and vulnerable adults can also occur within their personal relationships, as well as in the context of their home life.

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Signs of DA within the home may present through changes in a child behaviour, or through things they talk about. Regardless of if a child has been harmed directly all signs of DA must be reported just as any other safeguarding concern. Staff will be trained in the signs and when to report as part of the safeguarding training programme.

DSLs will need to use experience and discretion when handling concerns of DA, with regards to parental information sharing, and should seek to consult with other MAP involved with the children such as school to form a wider picture.

Forced Marriage of a Child

Hundreds of people in the UK (particularly girls and young women), some as young as nine, are forced into marriage each year. A 'forced' marriage, as distinct from a consensual 'arranged' one, is a marriage conducted without the full consent of both parties and where duress is a factor. Duress cannot be justified on religious or cultural grounds. A child who is being forced into marriage is at risk of **significant harm** through physical, sexual and emotional abuse.

The majority of forced marriages reported to date in the UK have involved families from South Asia; other communities in which there have been cases include Europe, East Asia, the Middle East and Africa. Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas or a British national being taken abroad.

Identifying Factors

Suspicious that a child may be forced into marriage may arise in a number of ways, including:

- A family history of older siblings leaving education early and marrying early;
- Depressive behaviour including self-harming and attempted suicide;
- Unreasonable restrictions such as being kept at home by their parents ('house arrest') or being unable to complete their education;
- A child being in conflict with their parents;
- A child going missing / running away;
- A child always being accompanied including to school and doctors' appointments;
- A child talking about an upcoming family holiday that they are worried about, fears that they will be taken out of education and kept abroad; or
- A child directly disclosing that they are worried s/he will be forced to marry.

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Information about a forced marriage may come from one of the child's peer group, a relative or member of the child's local community, from another professional or when other family issues are addressed, such as domestic abuse between parents.

Handling a Concern

The needs of victims of forced marriage will vary widely. The child may need help avoiding a threatened forced marriage, or help dealing with the consequences of a forced marriage that has already taken place.

Where a suspicion or allegation of forced marriage or intended forced marriage is raised, there may be only one opportunity to speak to a potential victim, so an appropriate initial response is vital. The practitioner should:

- See the child immediately in a secure and private place;
- See the child on their own or with another practitioner/DSL
- Explain to the child the limits of confidentiality;
- Tailor their approach according to whether the child is already married or is at risk of being married;
- Gather as much information as possible (e.g. the details of the plan to force the child to marry, including a traceable address overseas) as a victim may never be seen again;
- Inform a DSL as a Safeguarding incident;
- Plan with the child a way to secure their safety;
- Explain all the options to the child (starting with the fact that forced marriage is illegal in the UK) and recognise and respect the child's wishes. If the child does not want LA children's social care to intervene, the professional will need to consider whether the child's wishes should be respected or whether the child's safety requires that further action be taken. This requires the professional to make an assessment of the risk of harm facing the child;
- **Agree a means of discreet future contact with the child;**
- Record all discussions and decisions (including rationale if no decision is made to refer to LA children's social care).

Unaccompanied minors

The location of our charity in Kent, particularly the site at Aylesham within the Dover District, increases the likelihood that we will work with young people who are unaccompanied minors (UM). These young people have a higher risk of abuse, for a variety of reasons, such as;

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- Language and communication barriers, many may speak no English
 - Having no parent or guardian to safeguard them and delivery basic needs
 - Being in care
 - Lack of understanding of culture and attitudes in the community they live
 - Racism

Young people that are UM, are at a higher risk of abuse, such as CCE, CSE and trafficking, further guidance in these matters can be found within this policy.

Identity & LGBTQIA+

We are aware that for some young people their identity will not be binary, or in line with their biological make up. The way this is responded to by family, peers and professionals, can have a significant impact on the child's wellbeing. We will ensure our team always take the child's wishes into account with regards to how they identify when they are in our centres. When this goes against the wishes of a parent, the DSLs will hold a Strat discussion to decide which approach is in the best interest of the child, which will always be the over riding factor.

The association will look to be supportive of young people identifying as one of the recognised LGBTQIA+ groups, and be accepting of any sexuality young people identify as, it will also support young people who are unsure of their gender identify or are not identify as their birth gender, however will not recognises young people identifying as a non-human. Where a young person's choice is not supported by the family, we understand this poses a risk of emotional abuse or other abuse. When there is an issue with family acceptance an internal strat discussion will be had about how we can support the child and family to prevent harm to the child.

We will through our approach to working with young people and activities in our services promote a 'be you' attitude, and ensure young people in our services are educated about tolerance and accepting people for who they are.

We will support young people with their identity and ensure our practice reinforces that for all young people we are a place of safety. For LGBTQIA+ young people this will having a place with trusted adults they can discuss openly their identity and challenged they have. The Association will have a youth worker designated as the LGBTQIA+ practitioner able to provide support to young people and assist in team training, to raise awareness across the organisation.

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The association has gender neutral toilets available at all sites, and does not arrange youth activities that are gender specific.

The association has considered the non-statutory guidance for schools and colleges on gender questioning children. The association has considered this guidance's due to the age of the young people we work with and the number of young people from the LGBTQIA community who use the associations services. The association has also considered the views of young people and past serious case reviews and internal practice reviews. Based on these sources the association believes the guidance to be contradictory to its priority of ensuring all young people have a safe place to come to and a place they can find support in a time of a crisis. As such the Associations policy on this matter will remains as above, which is opposition to the guidance. However, the association will always aims to work with families as a whole and ensure support is given where possible to a family, without impeding the young person's sense of identity and safety when accessing our services.

Additional risk factors

Young carers

Young carers are children and young people under the age of 18 who provide unpaid care to a family member with a disability, illness, mental health condition, or substance misuse problem. This care can involve practical tasks like cooking and cleaning, personal care, emotional support, and managing medications or finances. These responsibilities often place a significant burden on young carers, impacting their well-being, education, and social life.

Staff should be aware that young people who having caring responsibility are at grater risk of abuse, as well as the risks associated with caring may have.

Staff should ensure DSL and wider team are aware of young people with caring responsibility and that support is offered to help them manage additional pressures.

SEND

WFCA acknowledges that children and adults with Special educational needs (SEN), disabilities, looked after or adopted from care can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. Members of staff are encouraged to be aware that these children can be disproportionately impacted by safeguarding concerns such as bullying.

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We consider:

- The specific needs and prior attainment of those in this group
- How these needs may increase their vulnerabilities online and in person (such as bullying)
- What actions we can take to minimise risks online for our vulnerable children and adults
- How policies need to be adjusted to ensure they consider and support vulnerable children and adults

Keeping Children Safe in Education 2024 list the following additional barriers for SEND children:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.

Online presence

The online world and changing digital landscape means that young people are exposed to growing and emerging risks. Staff will be vigilant of the risks young people are at and ensure they feedback new and emerging risks.

When assessing safeguarding concerns, DSLs will need to consider how online activity may impact this.

Appendix 4 gives further guidance on how the association manages online risks

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Part 4 Procedures and Systems

Our approach

The association believes that it is one of our fundamental duties to safeguard children from maltreatment; impairment of health or development; and ensuring that children grow up in circumstances consistent with the provision of safe and effective care through acting to enable all children to have the best outcomes, and never being passive in the protection of others.

The association through its policy and practice; strives to create a culture of safeguarding in which everyone takes responsibility for those we work with, to protect them from harm or impairment, and give them the best outcomes, always with an attitude of "it could happen here".

Our approach is formed from the understanding that no single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Regular training and awareness raising will be carried out by the DSL team throughout the year and all staff will be aware of who the DSL team are, their role, and feel comfortable approaching them for advice at any time regarding safeguarding. Staff will also always know they are able to report concerns anomalously through the whistleblowing process, to ensure there are no barrier to reporting.

A safe and supportive space

WFCA recognises that safeguarding young people, spans far further than to respond to harm once it has occurred, and the development and wellbeing of the young people and vulnerable adults we support is also paramount. We aim to develop and run services that ensure all of our facilities are working towards the aims of providing fun, safe and nurturing environments for young people and families to become the best versions of themselves. The board and leadership team will be innovative in their approaches to finding ways to deliver this aims to ensure our users have the support they need to succeed.

A key part of our ethos around safeguarding is ensuring our centres are safe places that children and families can trust and turn to for support or come to when in crisis. Delivering this is a significant tasks and will be a priority of the leadership team.

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We acknowledge the importance of working with families as part of a multiagency response to supporting families, and will do so by fostering good relationships with both young people, their families and other professionals in the area.

At no time will the use of corporal punishment be tolerated, and will always be treated as abuse.

Personnel Recruitment

The Association will work to ensure that all paid and unpaid staff are suitable to work in an environment where they will encounter children and vulnerable people. The Association will use safer recruitment practice to protect children and vulnerable people using the government guidance of deter, detect, prevent, and reject. The Association will ensure they deter unsuitable applicants by use of job descriptions and advertisements that make clear the importance of safeguarding.

All applicant will be made aware that as part of our vetting process online searches will be carried out as part of our shortlisting to asses any possible risks and inaccuracies in applications. Staff and trustees will be interviewed by someone with safer recruitment training. All employees, trustees and volunteers are required to provide references.

The process for recruitment of staff who will be practitioners or in close/regular contact with young people will follow the process

1. Advertisement to include reference to safeguarding
2. Application via application form
3. Online searches to verify information given and check for concerns
4. Safer recruitment interview
5. Reference requests sent
6. DBS received and assessed
7. Reference verbally verified
8. Employment confirmed

All paid and unpaid staff involved in regulated (Appendix 9.) or intensive contact with vulnerable people as part of their work for the Association will be assessed for their suitability and be subject to the Disclosure and Barring Service which has replaced both the Vetting and Barring Scheme and the Independent Safeguarding Authority. The Association will use the DBS information to risk assess individual roles in line with guidance from Ofsted and the Department of Education. With additional guidance beyond the policy is when

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guidance will be taken from Ofsted best practice. The Association reserves the right to refuse to employ staff, trustees or volunteers who it has a reasonable belief may pose a risk to children and vulnerable adults. This is part of our recruitment practice, outlined on our employment policy.

Key Roles

***DSL** - This role will be held by the senior officer of the charity/ group; this is currently the Chief Executive Officer.

***DDSL** - This role is to deputise for to the DSL and should be part of all ongoing safeguarding cases to remain up to date.

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The training of the DSLs and Deputy DSLs will be updated formally every two years but their knowledge and skills will be updated through a variety of methods (*e.g. e-Bulletins, conferences, local meetings, other training etc.*) at regular intervals and at least annually. The Trust has appointed additional staff to deputise for the DSL. Whilst actions may be delegated to the DDSLs, the ultimate lead responsibility for safeguarding and child protection remains with the Designated Safeguarding Lead and this responsibility will not be delegated.

It is the role of the DSL to:

- Act as the central contact point for all staff to discuss any safeguarding concerns
- Maintain a confidential recording system for safeguarding and child protection concerns
- Coordinate safeguarding action for individual children
- Liaise with other agencies and professionals in line with Working Together to Safeguard Children 2023
- Ensure that locally established referral procedures are followed as necessary
- Represent, or ensure the association is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences)
- Manage and monitor the associations role in any multi-agency plan for a child
- Be available to staff to discuss any safeguarding concerns
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2024)
- Report to the board an overview of safeguarding operations and cases, along with recommendations on policy change.

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SG Strat Team – A team of staff responsible for monitoring safeguarding across all activities, making recommendations for policy changes, and delivering the safeguarding culture. The team will include the DSL, DDSLs, other operational senior leaders, community team leads.

Lead trustee – A Board member with responsibility for oversight of this policy and ensuring its compliance. They will ensure the policy is reviewed at least annually, and ensure other members of the Board have undergone the required training including annually reading KCSIE 2024 part 1. They will ensure the trustees recruitment and induction process is compliant with this policy. They will also meet with the DSL and Strat Team as needed to review compliance, including that of the IT infrastructure to protect young people.

Lead practitioner – An individual that leads a setting or service with WFCA who works with children and vulnerable people and has responsibility for safeguarding within the setting/service.

Practitioner – An individual that has contact with children or vulnerable people through their role at WFCA.

* a continuous rota of DSL/DDSL cover will be provided and maintained by the DSL and informed to the duty manager teams.

Responsibilities of all staff and volunteers

- Provide a safe environment for children and vulnerable adults
- Maintain an attitude of 'it could happen here' where safeguarding is concerned and to always act in the best interests of the child
- Understand our safeguarding policies and systems
- Undertake regular and appropriate training which is regularly updated
- Know what to do if a child tells them that he or she is being abused or neglected
- Know how to maintain an appropriate level of confidentiality
- Be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection
- Be aware of and take appropriate action to raise concerns regarding poor or unsafe practice or potential failures in the association safeguarding regime

Additional Responsibilities of practitioners

- Be prepared to identify those who may benefit from early help
- Understand the early help process and their role in it

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- ensure all children are able to develop appropriate strategies to recognise and respond to risk and build resilience
- take appropriate action to prevent safeguarding concerns escalating and work with other services as needed
- Respond to and refer any concerns about children or other members of the community in accordance with this policy

Training

All staff and volunteers will receive and will be required to read this Safeguarding Policy, they will also be given the opportunity to discuss this with a DSL. Those working in child care roles will also be expected to read and discuss with a DSL Part 1 of Keeping Children Safe in Education.

The DSL and lead trustee will be responsible for ensuring the quality of internal training and also that external training is qualified on a regular basis.

Practitioners level and above – will be provided with annual training on the safeguarding policy as part of their annual training programme as well as annual safeguarding refresh training.

The DSL will be responsible for arranging to have the following training: Designated Safeguarding Lead; Child Protection Level 2; Child Sexual Exploitation; Prevent; Safer Recruitment; Information Sharing and Consent; Understanding Child Development; Safeguarding Vulnerable Adults, and the Framework for Assessing Children's and Families. The DSL will be required to carry out regular CPD.

The DDSL will receive the following training: Designated Safeguarding Lead; Child Protection Level 2; Prevent; Safer Recruitment; Information Sharing and Consent; Understanding Child Development; Safeguarding Vulnerable Adults, and the Framework for Assessing Children's and Families.

Community team will received the following core training: Child safeguarding, adult safeguarding, prevent, understanding signs of neglect.

Additionally childcare team will complete: Understanding Child Development; Domestic Violence; and Bullying.

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Additionally Youth Practitioners will complete: Child Sexual Exploitation; Substance misuse, eating disorders, harmful sexual behaviour; and Understanding Child Development; Violence and Gangs.

All staff will receive the following training within 6 weeks of starting and refreshed annually: in-house annual safeguarding training provided by a DSL/ DDSL with training qualifications, and delivered as KSMAP Basic awareness with additional specific content to the association.

Induction training - On commencing employment all staff will be given a safeguarding briefing, informed of our policy and where to find it, they will also have the expectations on safeguarding and reporting process explained clearly on day one.

Practitioner and above levels, induction training will include training to identify and respond to signs of possible abuse and neglect at the earliest possible stages including:

- significant changes in children's behaviour
- deterioration in children's general well-being
- unexplained bruising, marks or signs of possible abuse or neglect
- children's comments which give cause for concern
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home or that a girl may have been subjected to (or is at risk of) female genital mutilation
- inappropriate behaviour displayed by other members of staff, or any other person working with the children, for example: inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images

'What to do if you're worried a child is being abused: advice for practitioners will form a key part of this training

Non-Staff

Visitors or contractors (not working with children or vulnerable adults) on site will have safeguarding information available to them with practice-based information regarding knowledge of what to do if there is a concern and the appropriate use of phones and tablets. There will be information on the DSLs available at all sites that is open access to any user.

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Staff supervision and support

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSLs

Staff working with children on a regular basis will take part in termly team meetings and termly one to one supervision with their line manager.

Multi-agency working

WFCA recognise and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance (WTTSC 2023), both to ensure children's needs are met and to protect them from harm. We will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals, in discussion with parents/carers as appropriate.

The association is not the investigating agency when there are child protection concerns. We will however contribute to the investigation and assessment processes as required. The Associations SG Strat team will work to establish strong and co-operative relationships with relevant professionals in other agencies. A key area of support we will aim to provide will be a link between families and professionals as trusted organisation by the families.

Information Sharing

WFCA acknowledge it is key to the protection of children, young people and vulnerable adults that information relating to the protection of them is shared appropriately we will follow the welfare and for guidance and best practice from 'Information Sharing March 2018'.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

When organisations resist the sharing of information need to support a child, the DSL will attempt to escalate the issue within the organisation that is not sharing, and failing this consult with the LADO if it is believed there is a risk of harm through the lack of information sharing.

Safeguarding education

Although the association work would not normally involve teaching, it will strive through the activities and services it provided to educate children and vulnerable adults around safeguarding to increase their resilience.

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Safe IT systems

The association acknowledges the importance and impact its IT infrastructure has on safeguarding, and will work towards the DfE filtering and monitoring standards for its IT networks.

The association will also work to ensure the infrastructure is sufficiently able to protect information held.

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Part 5- Reporting Concerns

All employees, trustees and volunteers have a duty to ensure that any suspected incident, allegation or other manifestation relating to child and vulnerable adult protection is reported to the DSL. This will include any use or reported use of corporal punishment or concerns of radicalisation.

All staff, volunteers and others working in direct or indirect contact with children and vulnerable people as part of the organisation's activities or as part of the environment where the activities take place, must be alert to the signs of abuse. Anyone who suspects that abuse is taking place in this environment or to whom a child or vulnerable adult discloses issues relating to safeguarding should contact the appropriate DSL immediately (on the same day). In some situations staff may have contact with adults who have children, should their contact with this adult lead them to believe there is a risk of harm to the child, this should be reported in the same way.

Disclosure or evidence for concern may occur in a number of ways including a comment made by a child or vulnerable adult, physical evidence such as bruising, a change in behaviour, or inappropriate behaviour or knowledge.

CPOMS (Child Protection Online Management System)

Duty Managers, Practitioners, Lead Practitioners and DSL have access to CPOMS our online safeguarding management system, and should use this to report all concerns and incidents, the system will automatically notify the DSL team.

Reports should be categorised as; Safeguarding – Incidents or Concerns, Communications, First aid, Bullying, Behaviour, Development

The DSL is able to review the notification alongside a chronology for that child and provide action notes for all staff/ individual staff involved with the child.

The system only allows for known children who have a profile to have cases logged, should an unknown child need to be logged, the system has four profiles for this, U12 Boy, U12 Girl, Teen Boy, Teen Girl. Only use these profiles when it is not possible to identify the child and give as much information as possible to allow the DSLs to attempt to identify the child. Staff without access to CPOMS should ask the duty manager or practitioner to help them log a report for non urgent cases, this must still be done by the individual themselves and not left to the person helping them to do for them.

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Concerns

The Association understands that at times staff may see or hear things that in their judgement they feel are concerning although there is no clear evidence of abuse. As part of safeguarding training, all staff will be trained on the importance of concern reporting, and how this may form a key piece of a larger picture, and this the importance of reporting this.

Practitioners should load these onto CPOMS, non practitioners Where possible should seek the support of a Duty Manager to assist them in logging this on CPOMS If this is not possible, staff should use the 'concern form' to log this and pass to the DSL. It is the responsibility of the DSL to record this information and check for any previous concerns raised for this child or family, or vulnerable adult. Should a pattern emerge the DSL should report this.

Allegations/ Disclosures / Incidents

These should be reported to the duty DSL immediately and brought to the attention of the DSL (Chief Executive Officer) as soon as possible via CPOMS or if not possible 'Safeguarding Incident Forms' are available for the reporting as well as body maps. These should be used to record the information factually as presented and not include opinion or speculation. Staff should only use body maps to record something they can see and they must never examine a child or vulnerable adult.

Any child or vulnerable adult who reports that they may have been abused must be listened to carefully in all and any circumstances. 'Listened to' means just that; on no account should suggestions be made to a child or vulnerable adult as to alternative explanations for their worries; neither should any member of staff or volunteer attempt to question the child as part of any investigation, as this could lead to primary evidence for any future investigation being compromised.

Staff cannot promise total confidentiality to people who disclose allegations. Staff should make this clear to persons who approach them, whilst also offering reassurance that they have a right to be heard and that their allegation will be taken seriously. All allegations brought to the attention of the Duty DSL will be reviewed along with any previous concerns. These will be assessed against the KSMAP threshold document to decide on the most appropriate course of action.

The following definitions should be used by the DSL when determining the outcome of allegation investigations:

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- a) Substantiated: there is sufficient identifiable evidence to prove the allegation;
 - b) False: there is sufficient evidence to disprove the allegation;
 - c) Malicious: there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false;
 - d) Unfounded: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively they may not have been aware of all the circumstances;
 - e) Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

It is the responsibility of the appropriate DSL to make the decision as to whether to inform Specialist Children Services, NHS Community Mental Health Team (CMHT) and/or the Police in the Central Referral Unit depending on the nature of the allegation. This will be based on all of the evidence presented at that time and in the past, and review in alignment with KSMAP thresholds. They may wish to seek advice from these agencies by phone when coming to this decision. They may also need to follow their legal duty to report the case to the Independent Safeguarding Authority.

The Association will co-operate fully with the Police, Social Services, the NHS and all other parties involved. In some cases a referral to these services will not be appropriate instead the DSL should consider how best to support the child with other referrals such as Early Help, local charities, schools or our own services.

When harm is present but the thresholds are not met, the association will attempt to put a support plan in place, and continue to engage the family/individuals.

In the case of families the association works with through SCS/ Early Help, such as engagement in core groups or CPC, the association will be able to contract the social worker with updates as relevant. However, when new information that poses a risk of harm to the child comes to light, this will be reported to the front door, as well as by notifying the social worker to ensure it actioned timely.

The same threshold of reporting to front door should be used for a child with or without an allocated social worker, we must not rely on the presence of a social worker in the child's team as a reason to not raise concerns.

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Should there be any immediate risk to the young person the case will be reported to the Police.

Allegation or a Concern regarding a staff member or volunteer

When a complaint of abuse is made against an employee on behalf of a child there should be immediate consideration of whether a child or children are at risk of significant harm and in need of protection.

Any employee who becomes aware of a possible allegation or concern of a child or adult protection nature involving a member of staff must take immediate steps to ensure the matter is reported to the Chief Executive Officer without delay. To avoid delay in the absence of the Chief Executive Officer they should report to the most senior DDSL. An investigation may be impeded if a concern is reported late or is communicated through several individuals before the Chief Executive Officer, and it is important that the Association establishes at an early stage, who the lead contact will be for liaison purposes, the person to be allocated the role of case manager, in the absence of the Chief Executive Officer, this decision will be taken by the Chair of Trustees with the DDSL.

In the event that the allegation or concern involves the Lead practitioner or Deputy Designated Safeguarding Lead (DDSL) then the matter must be reported directly to the Chief Executive Officer. Should the allegation or concern involve the Chief Executive Officer then the matter must be reported to the DDSL who must also refer the matter to the Chair of Trustee's. At all times any report of any allegation or possible concern will be dealt with in the strictest confidence, and if necessary staff can raise concerns directly with the Area Children's Officer (Child Protection) with full protection under the Public Disclosure Act 1998 ('Whistle-blowing').

The case manager, will consult the LADO threshold of harm document, to assess if the threshold of harm is met. When the assessment is that the harm threshold has not been met the matter will be internally investigated and responded to as a low level concern. When the threshold may have been met this will be responded to as an allegation of harm.

When responding to an allegation the case manager will refresh themselves on the guidance in part four of KCSE, and this policy.

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Low Level Concern

The term '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'

Low Level Concerns will be treated using the disciplinary process, as breaches of the staff/volunteer code of conduct and practitioner code of conduct. However, the process will be managed by the case manager not by the line manager. The case manager at regular interval throughout the investigation will review the case to ensure the threshold of harm may not have become met.

The case will be documented and reviewed with the lead trustee on its conclusion.

Allegation of harm

When the assessment is that the level of harm may reach the threshold the case manager must have an immediate preliminary consultation about the allegation or concern with the LADO (Local Authority Designated Officer) who will advise on further action in accordance with this procedure as appropriate. This consultation must take place prior to any form of investigation being undertaken by the Association or service and before the member of staff is made aware of the allegation.

The reporting member of staff, i.e., Chief Executive Officer 'DSL', DDSL, must also seek the advice of Peninsula regarding issues of process, responsibilities and communication. However, the guidance on suspension in this policy overrides any advice guidance from Peninsula.

The Chief Executive Officer or any other employee or trustee to whom an allegation has been reported, is not expected to investigate the allegation, or interview children, but to assess, after consultation with the LADO how the matter will proceed. Confidentiality must be maintained throughout this stage in order that any subsequent investigation is not prejudiced and that the interests of all parties are protected.

Where the allegation relates to the use of physical intervention to restrain a child (Section 93 of the Education and Inspections Act 2006 enables Association staff to use such force as is reasonable to keep a situation safe), the Chief Executive Officer should consult with the LADO in the first instance as this may be appropriately managed within the Association. It is important for this consultation to take place to demonstrate that the Association has acted

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in an open and transparent manner in establishing if the allegation meets the threshold for referral. An allegation of assault beyond the use of reasonable force however, would need to be referred to LADO as a child protection matter.

Considering Whether Suspension Is Appropriate

The suspension of an employee, particularly in situations of potential child or adult protection allegations will have a significant impact on the individual and therefore it is essential that the facts of the case, as they are known, and alternative courses of action are carefully considered in deciding whether to suspend. The specific arrangements for the suspension of staff are set out in the Association's disciplinary procedure, it is also essential that the Disciplinary Procedures are followed in terms of providing appropriate support to the individual throughout the period of suspension.

The decision to suspend is taken by the Chief Executive Officer and the Designated Trustees and not by the Police or the LADO. However, Social Care, in collaboration with other agencies, may advise the Director of any action recommended to ensure the protection of children and vulnerable adults, protection of employees and safeguarding of information and this advice should supersede any advice from the HR provider.

Initial considerations

It may not be immediately obvious that suspension should be considered, and this course of action sometimes only becomes clear after information is shared with, and discussion had, with other agencies.

In some cases, early or immediate suspension may impede a Police investigation, and therefore the decision whether to suspend may have to be delayed until sufficient evidence has been gathered. Suspension should be avoided in such cases wherever possible, and should not be seen as an automatic response to an allegation.

Suspension should only be applied if one or more of the following grounds apply

- a child or children or vulnerable adult would be at risk
- the allegation is so serious that summary dismissal for gross misconduct is possible
- it is necessary to allow any investigation to continue unimpeded.

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Confidentiality

The Chief Executive Officer, Board of Trustee's and Local authority officers have a responsibility to safeguard confidentiality as far as is possible. Sensitive information must only be disclosed on a need to know basis with other professionals involved in the investigative process. Other people may become aware of the allegation and may not feel bound to maintain confidentiality. Therefore consideration should be given on how best to manage information, particularly in relation to who should be told what, when and how. This is particularly relevant in respect of parents and carers and the media in light of new legislation and the anonymity clause.

Disciplinary Investigation

No action under the disciplinary procedure shall be taken in circumstances which may interfere with the child protection investigation. Child protection and criminal investigations shall be treated as paramount and any further action under disciplinary procedures may therefore have to await full completion of the child protection and criminal investigations, but will be undertaken as soon as possible.

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS Disclosures reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary reinvestigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the accused has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

Planning and Recording

It is essential to record the decisions reached and the rationale behind them. Records should also be made of the agreed action and strategies to manage the situation. The plan should clearly indicate the following

- any restrictions to normal contact or activity
- issues of contact with children or vulnerable adults
- arrangements for monitoring and welfare support in relation to the member of staff

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- monitoring the support available for the child or vulnerable person

Review and learning

Following any allegation against a member of staff, the DSLs will carry out a review, regardless of the outcome, to ensure practice and policy is working effectively to safeguard young people and this is being followed. This will be reported to the board, and approved recommendations implemented.

Safeguarding Record Keeping

Staff will record any concern that they have about a child on the safeguarding incident and logging facility of CPOMS, including a body map where injuries have been observed. DSLs and DDSLs will receive an alert indicating a new concern. Records will be completed as soon as possible by a member of staff after the incident/event, using the child's words where applicable.

All safeguarding concerns, discussions and decisions made (and justifications for those decisions) will be recorded. If members of staff are in any doubt about recording requirements, then they will discuss their concerns with DSL.

Incident /Welfare concerns are recorded on CPOMS, accessible to all staff, where DSLs and DDSLs are alerted immediately of the concern.

All follow up actions and justifications for those decisions are then recorded on CPOMS so that timelines and outcomes can be noted.

Adult safeguarding will be logged using the paper system and held securely in the CEOs office

Post referral to Specialist Children Services (SCS)

Having made a referral to SCS the DSL will ensure all records are up to date and stored appropriately, they will monitor the outcome of the referral to ensure a satisfactory outcome, should they not agree with the out come from the SCS they will follow the challenge and escalation policy set out by KSMAP.

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Post referral for additional support

In some situations, the DSL having reviewed against the threshold document will not be able to make a referral to the specialist children services, but will make other referrals to other organisations such as SATEDA (Swale Action To End Domestic Violence) or early help. In these circumstances a clear record of this will be made and the reasons for the referral. It will be the responsibility to monitor the situation to ensure no escalation has occurred and review the referral as necessary.

Disagreement with action taken

Should a member of staff or volunteer having referred a situation to the DSL not be satisfied with the outcome, they should first discuss this with the DSL. If their concerns are not resolved they should follow the whistle blowing process to log a concern with SCS and also internally.

Staff training will always include how staff can raise concerns independent to the DSL if they feel the association has not acted in the best interest of the child. Staff will also be made aware of the challenge and escalation policy set out by KSMAP.

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Part 6 – On-going practice

Working with the Disclosure and Barring Service

The Association has a statutory duty to make reports and provide relevant information to the Disclosure and Barring Service where there are grounds for believing, following an investigation, that an individual is unsuitable to work with children or vulnerable adults, or may have committed misconduct. The responsibility for reporting cases to the DBS lies with the appropriate DSL.

Whistle blowing

A member of staff, trustee or volunteer who raises an issue where they believe the employer, a fellow employee, any volunteer or user of the building is acting in a way which is unlawful or falls below proper standards or contrary to this policy are protected by the Public Disclosure Act 1998, provided they comply with statutory procedures.

Any employee looking at whistle blowing can do so by using the grievance procedure and in the first instance should discuss it with their line manager, the Lead Trustee or the appropriate DSL. Any volunteer with such concerns must raise it with the person responsible for their management or the Lead Trustee. Anyone involved in whistle blowing will be supported and the Association will ensure that proper procedures are followed.

The NSPCC runs a whistleblowing call line for concerns relating to children's safety: 0800 028 0285.

Serving and ex-offenders

WFCA will not allow under any circumstance an individual with a history of sexual crimes, or crimes committed against a child (under 16) to be employed or volunteer within any of its activities.

The Association does however, recognise the importance of rehabilitations of offenders and also the potential positive contributions and impact on it work with young people they can have. WFCA will in some of projects be working with over 12 years olds after full risk assessment of both the activity and individual, signed off at Executive level, have offenders and ex-offenders working under the supervision of practitioners.

Risk assessments

A designated individual will complete a risk assessment before any new or changed programme or event, visit or activity involving children or vulnerable adults is provided by

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the Association or before admitting new children or vulnerable adults. The risk assessment may not only look at mitigating or removing potential risk but may also provide a stimulus to consider alternative working practices.

Children and vulnerable adults who are wheelchair users will be actively encouraged to participate in activities. However, where the safety of other children and vulnerable adults may be compromised, such as in contact sports, certain disabled children and vulnerable adults may be encouraged to seek out more suitable activities for their disability.

Photos, cameras, videos and CCTV images

The Association may take photographs of children, young people and vulnerable adults participating in activities and events. All reasonable steps should be taken to inform parents and carers that photos may be taken in advance of the event or activity and to obtain their consent.

In some cases, consent is implied, such as community days, and youth clubs, where implied consent is taken, this is communicated via posters or the other communications routes. Implied consent is only authorised by the senior leadership team, at an event or activity that is deemed open access.

Where consent is explicitly not given any images made will not be saved or used in any way (e.g. in a publication or on the web site), unless the identity of the individual/s who have refused consent is protected.

The Association reserves the right to prohibit the use of cameras, videos and mobile telephones with picture taking capacity on its land and within any of its properties or at events it promotes. Used security videos will be kept in a secure place and destroyed when no long needed.

Staff should not use their personal phones and cameras within settings, this includes camera glasses.

Staff Behaviour

Staff and volunteers are expected to follow the staff code of conduct at all times.

Employees should be aware of legislation under the Sexual Offences Act 2003 that makes it an offence for those in a position of trust to have a sexual relationship with a young person

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between the ages of 16 and 18 years who is currently being cared for or educated by the individual.

Employees working in Associations have a statutory responsibility to report all allegations of child abuse and to alert others where appropriate if they suspect that child abuse may have occurred. Staff also need to be aware that if their own children come to the attention of the statutory agencies for child protection, then issues of suitability will need to be considered by the employer (as outlined in the KSCMP Operational Guidelines).

Access and signing in and out

In general where others (private, voluntary or statutory providers) are using the Association's facilities as hirers, they are responsible for maintaining appropriate registers of any children or vulnerable adults present. The Association is responsible for reminding all providers of this responsibility.

Where the Association is hosting community social or sporting events for unaccompanied children (up to 18 years of age) or vulnerable adults, the Association will be responsible for maintaining a register of attendees and signing the group in and out of the premises.

For general community events and activities, where it is reasonable to expect that any children or vulnerable adults present will be accompanied by a parent or carer, the Association will make sure in its general signage, publicity and ticketing material that parents and carers are aware of their responsibility for those in their care.

Due Diligence

The Association works with young people in a variety of ways; this policy has given detail of how we will ensure the young people we work with directly that safety is paramount. However, young people are involved in the centre through other providers over whom we do not have a direct control, therefore the following due diligence will be used.

Contractors working with young people employed by the Association & partners

We will require the adults who are working with children on behalf of the Association to be responsible for the safety of children and young people in their care whilst at the centre. They must have current DBS checks, current safeguarding policies or statements and have carried out formal training. The Association will satisfy itself that contractors know about and are compliant with, these requirements.

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Private function hire

Our hiring agreement will state clearly that it is the responsibility of the hirer to ensure the safety of all attending their event including the safeguarding of children and vulnerable adults.

Letting of rooms to users providing services to children

The Association, through the Community Centre, hires rooms to individuals and businesses that provide services to children, such as drama and dance classes. As part of the due diligence on the activities taking place at the centre and being advertised by the centre, hirers carrying out services for children will be expected to provide;

- *A current DBS certificate at the time of hiring and annually of the person taking the sessions*
- *A safeguarding policy statement, showing an understanding of the child abuse and reporting systems*

Hirers working with children through the Centre will be encouraged to take part in our safeguarding system. Hirers who do not have full safeguarding provisions and trained DSL will be expected to report concerns and incident to the WFCA DSL team. This will then be handled by WFCA in the same way as if it had been raised by WFCA staff/ volunteers.

Policy Status

This policy will be reviewed annually by the DLS and lead trustee for presentation to the Board for annual approval. The lead trustee works with the DSL and will have oversight of the safeguarding arrangement and ensure this policy is followed and report concerns to the Board.

Each meeting at Wider Leadership, Senior Leadership and Board level will have an item for discussion of safeguarding.

This policy will be available to all staff/volunteers/users/beneficiaries, copies will be held in the following locations:

- Reception
- Each site office
- SLT office
- Chief Executive Officer office (master copy)

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Printed copies of this policy will be regarded as out of date as soon as they are printed, the most up to date version of the policy can be found on the Policy Share Point

This policy applies to all employees, trustees and volunteers who have a legal duty to protect the personal safety of all children, young people and vulnerable adults using the facilities, resources and activities provided by the Association.

Other agencies (whether private, voluntary or statutory) using the building and its facilities will be expected to comply with these policies or their own safeguarding policies, a copy of which they will be asked to provide to the Association.

Date

Signed

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Appendix 1 – WFCA - Prevent Duty

Introduction

Extremism is defined as the support or promotion of an ideology based on violence, hatred or intolerance that aims to:

- deny or destroy the fundamental rights and freedoms of others
- undermine or overturn the UK's system of democracy and democratic rights
- intentionally create an environment that permits or enables others to achieve either of the above.

Types of behaviour which could constitute extremism, including:

- using or excusing violence towards a group of people to stop them from using their legally defined rights and freedoms
- seeking to overthrow or change the political system outside of lawful means
- using or excusing violence towards public officials, including British armed forces and police forces, to stop them carrying out their duties
- attempting to radicalise and recruit others, including young people, to an extremist ideology.

The association aims to creating a more supporting, accepting tolerant community as part of its strategic community impact. This leaves no place for hatred, and the association will work actively to educate and encourage the community to be open minded and accepting of each other. Through this the association hopes to reducing the growth of extremism within the community.

Alongside the wider work within the community, the association works to ensure its services users are protected from radicalisation, and any signs of it are actioned. Radicalisation is defined in the Prevent Strategy as “the process by which a person comes to support terrorism and forms of extremism leading to terrorism.”

The Association acknowledges the growing and serious risk to children and vulnerable people of radicalisation and aims to remove the risks of this taking place at the Association's premises and commits to ensuring those working with people at risk are able to escalate concerns correctly. This document has been informed by 'The Prevent Duty' (2015).

Our ethos and environment

When responsible for caring for children or vulnerable people, the Association will always aim to ensure the environment is conducive to free and open discussion amongst service users, staff and volunteers.

West Faversham Community Association School Club and Youth programmes will ensure their work plans deliver the promotion of British values through the planning process as well as being an environment in which young people can freely express themselves.

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West Faversham Community Association will advocate 'educate against hate' and ensure multiple methods of sign posting to 'educate against hate' are used.

Staff

The Chief Executive Officer (senior officer) will be the Prevent lead and DSL.

The Association will ensure all staff understand the risk of radicalisation and how to escalate any concerns. Escalation of concerns will be encouraged and never dismissed out of hand.

The Association will have an open approach to talking about concerns of radicalisation between all of its staff and volunteers across the group, ensuring they are always able and comfortable to raise and identify concerns.

British values within the Association

The Association advocates the British values essential to tackling radicalisation as defined by parliament: democracy; the rule of law; individual liberty; mutual respect and tolerance.

Identifying those at risk of or who are being racialized

Signs of radicalisations may be similar to other forms of abuse such as CSE and CCE, with complicating factors such as online exposure and bullying also being factors.

If a child or young person is being radicalised their day-to-day behaviour may become increasingly centred around an extremist ideology, group or cause. For example, they may:

- spend increasing amounts of time talking to people with extreme views (this includes online and offline communication)
- change their style of dress or personal appearance
- lose interest in friends and activities that are not associated with the extremist ideology, group or cause
- have material or symbols associated with an extreme cause
- try to recruit others to join the cause

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Reporting concerns

Staff and volunteers will be encouraged to bring any concerns regarding radicalisation of children and vulnerable people to the attention of the duty Designated Safeguarding Lead / Deputy Designated Safeguarding Lead.

The DSL will ensure the report is logged and brought to the attention of all DSL's. The DSL will gather evidence and where appropriate refer to the local authority Designated Officer or the police, thereby beginning the 'channel process' ¹ or a prevent referral.

Situations of imminent risk of crime being or having been committed will be reported to the police.

Implementing Prevent in letting the Association's rooms and facilities

The Association as a non-political association does not discriminate against any group when deciding to hire out its rooms. However, The Association stands against hate and extremism and when it is known or suspected at the time of booking that an individual or group hirer may intend to use the room/s or facilities to encourage crime or radicalisation, staff will refer the booking to the Director of Operations. The booking will risk-assessed and if there is a genuine concern in the professional judgement of the Chief Executive Officer, the booking will not be allowed.

Likewise, should information subsequently come to light that suggests there is a high chance of risk, the Association reserve the right to cancel the booking – this will be referred in the terms of hire with the following statement.

"West Faversham Community Association does not allow its premises to be used for the purpose of encouraging crime, preaching hate or attempting to radicalise individuals or groups. Should evidence suggest a hirer is likely to allow any of the above to occur it reserves the right to cancel the booking/s. Additionally, West Faversham Community Association reserves the right to inform the police and any other relevant body of a booking it has cancelled under this term and also to inform the police before, during or after an event taking place should they believe it may be, is or was used to preach hate, encourage crime or radicalise individuals or groups.

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Appendix 2 – WFCA - Missing Children

Introduction

West Faversham Community Association aims to provide a place of safety and comfort to children and vulnerable adults from the community; it is therefore possible that when in a time of crisis, children and vulnerable people may come to the centre as a place of safety. West Faversham Community Association acknowledges that these situations must be handled sensitively and professionally.

A child presenting/being found

Should a child present or be found on the property of the Association who staff/ volunteers believe to be a missing child, they will inform the Designated Safeguarding Lead (DSL) who will inform the police and where appropriate, Kent Safeguarding Children's Multi-Agency Partnership.

Wherever possible, a known youth worker or practitioner should make contact with the young person first to ensure they are reassured and encouraged to remain on the premises.

Young people falling out of contact

Although the services provided by West Faversham Community Association are offered informally with no requirement to attend, staff and volunteers will be expected to raise any concerns they have regarding the non-attendance of any young person.

Additionally, in line with guidance about the signs of child sexual exploitation, youth workers will report any concerns of young people leaving for short periods of time or leaving early from a setting.

Young people not in education, employment or training (NEETS) falling out of contact

West Faversham Community Association works with 70 NEETs aged 16 - 25. If, in any of the projects being provided, a young person unexpectedly stops attending or making contact, the Association, through the Designated Safeguarding Lead, will make contact with the referral agency for that young person and where appropriate, Kent Safeguarding Children's Multi-Agency Partnership.

Reports of a child known to West Faversham Community Association, going missing from home or care

Should it be brought to the Associations' attention that a child known to the Association has gone missing from home or from their place of care, the Designated Safeguarding Lead will be informed straight away. The Designated Safeguarding Lead will arrange for a 'building

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sweep' to be carried out immediately and then at intervals throughout the day, recognising that the centre may be considered a safe place for many of the young people who use it.

Child missing whilst in our care

It is our policy to use regular registration procedures throughout the day/session to identify any missing child, to keep the building secure and to act quickly to search the building and its surroundings making effective use of CCTV in the event of a missing child. Parents, carers and where appropriate, the police will be notified after confirmation of absence. Please see our emergency plan for more details.

Reporting

Staff and volunteers will report any case of a young person going missing straight away to the DSL. In situations where a report is made about a child that has not also or already come in via the police or other official channel, the DSL will decide who should be notified including, where appropriate, Kent Safeguarding Children's Multi-Agency Partnership, the police or both.

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Appendix 3 - Online Safety of Young People

Introduction

Internet technology (IT) is now an integral part of children's lives and provides them with access to a wide range of information and increased opportunities for instant communication and social networking.

Using the internet can benefit children's education and social development, but it can also present several risks. Children are often unaware that they are as much at risk online as they are in the real world, and parents may not be aware of the actions they can take to protect them.

It is WFCAs policy that the educational and social benefits of the internet should be promoted, but that this should be balanced against the need to safeguard children.

Risks

Content - The internet contains a vast store of information from all over the world which is mainly aimed at an adult audience and may be unsuitable for children. There is a danger that children may be exposed to inappropriate images such as pornography, or information advocating violence, racism or illegal and anti- social behaviour that they are unable to evaluate in a critical manner.

Contact - Chat rooms and other social networking sites can pose a real risk to children as users can take on an alias rather than their real names and can hide their true identity. The sites may be used by adults who pose as children in order to befriend and gain children's trust (known as "grooming") with a view to sexually abusing them.

Children may not be aware of the danger of publishing or disclosing personal information about themselves such as contact details that allow them to be identified or located. They may also inadvertently put other children at risk by posting personal information and photographs without consent. The internet may also be used as a way of bullying a child, known as cyberbullying.

Commerce - Children are vulnerable to unregulated commercial activity on the internet that could have serious financial consequences for themselves.

Desensitization - They may visit sites that advocate extreme and dangerous behaviour such as self-harm or suicide or violent extremism, and more vulnerable children may be at a high

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degree of risk from such sites. All children may become desensitised to pornography, violence, sex and drug use or self-harm by regularly viewing these online.

Over use - Children may also be adversely affected by obsessive use of the internet that may have a negative impact on their health, social and emotional development and their educational attainment.

Within the context of WFCA

Practitioners have a key role in protecting young people from harm that could be caused by technology, this will be through helping the children they work with to keep themselves safe on-line and dealing with safeguarding issues arising from e-safety incidents.

Control of access

WFCA will seek to ensure safe systems are in place through use of safe filtering to block access to unsuitable sites. Young people under the direct care of WFCA will not have unsupervised access to the internet

Supporting young people's understanding

Practitioners will be able to guide young people on the following areas to help ensure the safety of young people while using the internet;

- the benefits and risks of using the internet
- how their behaviour can put themselves and others at risk
- what strategies they can use to keep themselves safe
- what to do if they are concerned about something they have seen or received via the internet
- who to contact to report concerns
- that they won't be blamed if they report any e-safety incidents
- that cyberbullying cannot be tolerated
- the basic principles of "netiquette" (how to behave on the internet).

WFCA will ensure information on internet safety and links to key support sites are easily available to young people using the internet.

WFCA practitioners will seek to provide guidance to young people on all forms of internet use however a particular focus will be on social networking, and the sharing of images of themselves. This will include ensure older young people have a full understanding of the law around sharing indecent images.

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Working with young people to prevent and respond to cyberbullying

Cyberbullying is defined as the use of IT to deliberately hurt or upset someone. Unlike traditional physical forms of bullying, the internet allows bullying to continue past school hours and invades the victim's home life and personal space. It also allows distribution of hurtful comments and material to a wide audience.

WFCA practitioners will work with young people to ensure they understand that actions they take may be cyberbullying and what to do if they are a victim of cyber bullying.

Non-contact sexual abuse

Children may also be sexually abused on-line through video messaging such as Skype or similar systems/apps. In these cases, perpetrators persuade the child concerned to carry out sexual acts while the perpetrator watches/records. The perpetrators may be adults but may also be peers.

In the event of an incident, the child should be taught how to use the CEOP "Report abuse" button (normally displayed on the screen) and parents should contact the police to report the incident. Any reporting of an incident to or suspicion of an incident having occurred by a practitioner will be reported to a DSL with the incident report form.

Sexting

Sexting is sending, receiving, or forwarding sexually explicit messages, photographs, or videos, primarily between mobile phones, of oneself to others. It may also include the use of a computer or any digital device.

Young people involved in sexting are at risk of criminal prosecution, due to the legality of sending or receiving images of a sexual nature of someone under 18, regardless of consent. Young people are also at risk of these images being exposed or shared without their consent at a later date, causing distress or resulting in coercive behaviour.

Many young people will engage in this at some point, the team will ensure they are proactive in ensuring young people are aware of the risks of this.

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Appendix 5 - Young People and Gangs

Introduction

WFCA is aware of the growing risk of involvement of young people in the area with Gangs, and risks to the young people associated with this. Addressing concerns arising from a young person's involvement in a gang is a multi-agency issue; partnership working and information sharing are key to safeguarding children and young people at risk of gang-related harm. WFCA will seek to be actively involved in this partnership, working to avoid or reduce the impact of harm of children from gangs.

It is important to note that young people can be put at risk by gang activity both through participation in and as victims of gang violence.

Overall, children particularly vulnerable to suffering harm in the gang context are those who are:

- Not involved in gangs, but living in an area where gangs are active, which can have a negative impact on their ability to be safe, healthy, enjoy and achieve, make a positive contribution and achieve economic well-being;
- Not involved in gangs, but at risk of becoming victims of gangs;
- Not involved in gangs but at risk of becoming drawn in, for example, siblings or children of known gang members; or
- Gang-involved and at risk of harm through their gang-related activities (e.g. drug supply, weapon use, sexual exploitation and risk of attack from own or rival gang members).

Safeguarding should focus on young people who are vulnerable of making the transition to gang involvement as well as those already involved in gangs. Practitioners should be aware of particular risks to young people involved in gangs from violence and weapons; drugs and sexual exploitation.

Definition of a Gang

Being part of a friendship group is a normal element of growing up and it can be common for groups of children and young people to gather together in public places to socialise. Although some group gatherings can lead to increased antisocial behaviour and youth offending, these sorts of activities should not be confused with the serious violence of a gang.

Defining a gang is difficult, they tend to fall into three categories; Peer Groups, Street Gangs and Organised Crime Groups.

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A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity.

A Street Gang will engage in criminal activity and violence and may lay claim over territory (not necessarily geographical but it can include an illegal economy territory); they have some form of identifying structure featuring a hierarchy usually based on age, physical strength, propensity to violence or older sibling rank. There may be certain rites involving antisocial or criminal behaviour or sex acts in order to become part of the gang. They are in conflict with other similar gangs.

An Organised Criminal Group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise). This involves serious and organised criminality by a hard core of violent gang members who exploit vulnerable young people and adult. This may also involve the movement and selling of drugs and money across the country, known as 'county lines' because it extends across county boundaries. Young women and men may be at risk of sexual exploitation in these groups.

There is a distinction between Organised Crime Groups and Street Gangs based on the level of criminality, organisation, planning and control, however, there are significant links between different levels of gangs. Activity can include Street Gangs being involved in drug dealing on behalf of Organised Criminal Groups and the sexual abuse of girls by Organised Criminal Groups.

Gang-Related Activity and Young People

The risk or potential risk of harm to the child may be as a victim, a perpetrator or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or mental health problems.

A child who is affected by gang activity or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

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Violence is a way for gang members to gain recognition and respect by asserting their power and authority in the street, with a large proportion of street crime perpetrated against members of other gangs or the relatives of gang members.

The specific risks for males and females may be quite different. There is a higher risk of sexual abuse for females and they are more likely to have been coerced into involvement with a gang through peer pressure than their male counterparts.

A recent study of street crime confirms that much of it is primarily concerned with respect and recognition rather than monetary gain. Gang members will sometimes video their offences and post them on websites. While this renders them more vulnerable to prosecution (these sites can be a good source of intelligence), it serves to consolidate their reputation for toughness and hence the 'respect' to which they aspire.

Respect matters to children in relation to gangs because to be 'disrespected' makes a child a target for anyone who wants to make a name for themselves. An act of 'disrespect' that goes unpunished can be perceived as inviting a challenge from rivals within their own gang as well as members of other groups. In certain neighbourhoods, being 'mugged' is often a prelude to a career of street crime prompted by fear as children endeavour to rebuild respect in their social group in the wake of an attack.

Violence is also a way for gang members to gain recognition and respect by asserting their power and authority in the street, with a large proportion of street crime perpetrated against members of other gangs or the relatives of gang members.

Identification and Risk Factors

There are particular risk factors and triggers that young people experience in their lives that can lead to them becoming involved in gangs. Many of these risk factors are similar to involvement in other harmful activities such as youth offending or violent extremism. There are certain indicators that WFCA practitioners will be trained to be vigilant of and when identified required to act upon:

- Becoming withdrawn from family;
- Sudden loss of interest in school – decline in attendance or academic achievement;
- Starting to use new or unknown slang words;
- Holding unexplained money or possessions;
- Staying out unusually late without reason;
- Sudden change in appearance – dressing in a particular style or 'uniform';

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- Dropping out of positive activities;
 - New nickname;
 - Unexplained physical injuries;
 - Graffiti style tags on possessions, school books, walls;
 - Constantly talking about another young person who seems to have a lot of influence over them;
 - Broken off with old friends and hanging around with a new group;
 - Increased use of social networking sites;
 - Starting to adopt codes of group behaviour e.g. ways of talking and hand signs;
 - Expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past;
 - Being scared when entering certain areas;
 - Being concerned by the presence of unknown youths in their neighbourhood.

An important feature of gang involvement is that, the more heavily a child is involved with a gang, the less likely they are to talk about it.

Support and Interventions

Suspected gang involvement will be reported by practitioners to the Duty DSL using an incident report form, or when minor behaviour changes are observed be recorded through the concerns logging process.

DSL will use the KSCPM guidance and threshold document to report any suspected gang involvement, they will also work with the local PSCO to start interventions.

WFCA will seek to provide support to the young people and put in place early help support packages to reduce the risk of further gang involvement, or victimisation by gangs.

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Appendix 6 – Establishing the need to DBS

