**Kent Supported Homes Safeguarding Policy**

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A close-up of several people

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# 1. Introduction

* This guidance and information is for Kent Supported Homes (KSH) Hosts, social workers and accommodation officers and describes the policy and procedures to be followed on safeguarding and child protection. It provides information and outlines expectations of practice to help staff and Hosts understand their professional responsibilities for safeguarding. Kent Supported Homes aims to promote the welfare of and safeguard all young people in compliance with the principles embodied within the Children Act 1989 and subsequent legislation and statutory guidance including the standards set out in the Guide to the Supported Accommodation Regulations including Quality Standards March 2023 Regulation 5 and Regulation 20.
* This guidance should be read in conjunction with the policy and procedures of the Kent Safeguarding Children Multi-agency Partnership (KSCMP) and should also reflect the approach taken in the Kent Fostering Service.
* We want all young people to feel safe and feel that their needs are being met.
* Hosts should meet high standards of support, where those standards fall below the required standard or when concerns about standards of support result in complaints or child protection allegations against Kent Supported Homes Hosts, these procedures will be followed. The Policy also explains the support available to Hosts who are the subject of complaints or allegations.
* Hosts should protect young people from harm, including abuse, accidents, bullying or negative attitudes and operate within a safeguarding culture and ethos.
* Hosts, like foster carers, should work in partnership and collaboration with other agencies and professionals and it is imperative to understand the importance of information sharing with these colleagues in order to promote the welfare and safeguarding of the young person.
* Hosts will have training to help them understand their roles and responsibilities and understand the balance of risk recognising the age and agency of the young people living with them.

# 2. Background information

This policy outlines the requirements on Hosts and wider staff within the local authority and partner agencies, in respect of safeguarding practice and process. It applies relevant legislation and regulations to outline what is required and why and by whom actions must be taken to safeguard the young people in the provision of Kent Supported Homes supported lodgings service.

This policy utilises current KSCMP policy and process, alongside standards set in procedures relating to the KCC Fostering Service and Children’s Homes to satisfy the requirements of The Supported Accommodation (England) Regulations 2023.

# 3. Principles

Hosts should work to ensure that the young people they support are protected from harm and enabled to keep themselves safe.

* That the team (Social Worker, Accommodation Officer and Host) around the young person assess the risk for each young persons and have plans in place to reduce any harm or risk they may be subject to.
* Help is provided to all young people to understand how to keep themselves safe.
* Hosts have the skills to identify and act upon signs that a young person is at risk of harm.
* Help manage relationships between young people to prevent them harming each other.
* Understand the roles and responsibilities in relation to protecting young people living within their homes.
* Take effective action whenever there is serious concern about a young person’s welfare.
* Are familiar with and act in accordance the Kent Supported Homes (KCC’s) safeguarding policies and procedures.
* Any serious incidents are reviewed and any learning is shared to help improve and review the effectiveness of those policies to help improve practice.

# 4. Definitions

Safeguarding is a term which is broader than 'child protection' and relates to the action taken to promote the welfare of children and protect them from harm. Safeguarding is everyone's responsibility. Safeguarding is defined in [Working Together to Safeguard Children](https://www.workingtogetheronline.co.uk/) as:

* Protecting young people from maltreatment;
* Preventing impairment of young people’s mental health and physical health and development;
* Ensuring that young people grow up in circumstances with the provision of safe and effective support; and
* Taking action to enable all young people to have the best outcomes.

There are four defined categories of child/young person abuse:

* Physical abuse;
* Emotional abuse;
* Neglect;
* Sexual abuse.

# 5. Proactive safeguarding

The Host must be proactive in working with young people to reduce the risk of harm to them and sets high expectations to ensure that young people feel safe and are safe, understand how to protect themselves and are protected from significant harm. This includes (but is not limited to) neglect, abuse, sexual and criminal exploitation, accidents, bullying, self-harm, forced marriage, female genital mutilation, homophobic behaviour, racism, sexism and other forms of discrimination and radicalisation. Any discriminatory behaviours are challenged and help and support are given to young people about how to treat others with respect. Hosts are prepared and supported to respond to young people who may face these risks and receive suitable training.

Young people must feel safe and be safe. Hosts should support young people to be aware of and manage their own safety both inside and outside the home to the extent that any good parent would. Hosts should help young people to understand how to protect themselves, feel protected and be protected from significant harm, and such work should be done in collaboration with the young person’s social worker.

Young people should be encouraged to develop positive relationships with others both in and outside the home as set out in the promotion of positive behaviours. However, Hosts should be alert to the possibility that young people may be at risk from such relationships including with other young people living in the household, family members, friends and others outside the home, and they therefore should take appropriate steps to protect the young person where there are concerns for the young person’s safety.

Proactive and creative safeguarding practice means that all young people, including the most vulnerable, have a strong sense of safety and well-being and so are unlikely to go missing from their home on a regular basis. See the [Missing Children policy](https://kentchhomes.trixonline.co.uk/chapter/missing-children).

# 6. Support and placement planning

Care and placement planning should ensure that any risks associated with young people offending, misusing drugs or alcohol, self-harming, going missing, being affiliated with gangs, being subject to sexual or criminal exploitation, extremism or radicalism are known and understood by the Host and wider staff group who support them. This includes regular contact and planning with the young person’s allocated social worker and their family, if this is appropriate and in accordance with plans for their future.

Leaders and managers will regularly review and act on any known risks to children, taking advice and guidance from local partners and agencies as appropriate.

# 7. Working in partnership

The Host’s designated senior manager (Team Manager for Kent Supported Homes) is responsible for coordinating safeguarding children referrals.

However, safeguarding and promoting the welfare of young people and protecting them from abuse and harm is a shared responsibility and depends on effective joint working between all colleagues working within the Kent Supported Homes service and other agencies. All Hosts have a responsibility to report any suspicions that a young person has been mistreated or harmed.

Local authorities have a duty to promote and safeguard the welfare of children and young people, to investigate and take necessary action to protect them from abuse and harm.

The Hosts will maintain effective links with local authorities, their designated accommodation officers and the young person’s social worker and via other safeguarding agencies and ensure that there is good communication about safeguarding issues, such as self-harm or injury. The local authority also has good relationships with relevant local voluntary sector organisations that may be able to offer specialist support to children in keeping themselves safe, which can be utilised to support the Hosts.

Kent Supported Homes will also make all notifications as required by Regulation 27 to notify placing authorities, Ofsted and other relevant persons about serious events as outlined within the regulation. This process for notification is in the following section.

# 8. Process for notifications of serious events procedure (Regulation 27)

Kent Supported Homes’ Team Manager and the placing authority must always be notified of any serious event. Notifications of a child’s death should always be made without delay.

In the case of events other than the death of a child, a more proportionate approach should be taken and, before making a notification to Ofsted, sufficient time should be taken to collect any further information required in order to determine whether the incident is in fact serious enough to warrant a notification to Ofsted.

Regulation 27 (notification of a serious event) of the Supported Accommodation (England) Regulations 2023 sets out the arrangements for notifications by the registered person in relation to serious incidents which should be shared with Ofsted. The intention is that Ofsted should only be notified of the most serious incidents.

Notifications to Ofsted should be made by using the [online notification form](https://www.gov.uk/guidance/tell-ofsted-about-an-incident-childrens-social-care-notification). Any member of staff can complete the notification form, but the Kent Supported Homes Team Manager is responsible for ensuring notifications are made. When making the notification the Unique Reference Number (URN), full postal address and details of the incident and those involved will be required.

In urgent situations, particularly where there is likely to be media interest in the incident, Ofsted can be contacted by telephone (0300 123 1231).

|  |  |
| --- | --- |
| **Serious event** | **Who to notify** |
| Death of a child | [Ofsted](https://www.gov.uk/guidance/tell-ofsted-about-an-incident-childrens-social-care-notification)  His Majesty's Chief Inspector  of Education, Children's Services and Skills (CIECSS);  the accommodating authority;  the Secretary of State;  the local authority in whose area the premises used as supported accommodation are located (if that local authority is not the accommodating authority);  the integrated care board (established under Chapter A3 of Part 2 of the National Health Service Act 2006) for the area in which the premises used as supported accommodation are located;  any relevant person not included above |
| Referral of a person working for the supported accommodation undertaking pursuant to section 35 of the Safeguarding Vulnerable Groups Act 2006 | [Ofsted](https://www.gov.uk/guidance/tell-ofsted-about-an-incident-childrens-social-care-notification)  the CIECSS;  the accommodating authority;  any relevant person not included above |
| * A child is involved in or subject to, or is suspected of being involved in or subject to, sexual exploitation or child criminal exploitation; * An incident requiring police involvement occurs in relation to a child and the registered person considers that incident to be serious; * There is an allegation of abuse against the supported accommodation undertaking or a person working for it; * A child protection enquiry—   is instigated, or  concludes (in which case, the notification must include the outcome of the child protection enquiry);   * There is an incident involving the use of a measure of restraint of a child; * There is any other incident relating to a child which the registered person considers to be serious. | [Ofsted](https://www.gov.uk/guidance/tell-ofsted-about-an-incident-childrens-social-care-notification)  the CIECSS and  any relevant person not included above |

The Kent Supported Homes Team Manager must ensure that a notification in writing made under this regulation includes details of the event concerned; any other individuals or organisations who or which have been notified and any actions taken by the registered person as a result of the matter.

# 9. Managing risks

Hosts should be adequately informed by the young person’s social worker of any potential risks and should be vigilant about any potential risks each young person living in their home may be subject to and should follow any plans put in place to help mitigate those risks. Where there are safeguarding concerns for a young person, their placement plan, agreed between the Host, the social worker, the accommodation officer and the young person, must include details of the steps the Hosts will take to manage any assessed risks on a day-to-day basis.

Young people will be supported to take age-appropriate risks, as part of their development of independent living skills. The Host – in consultation and collaboration with the young person’s social worker – will implement a proportionate approach to risk assessments to ensure that these work in practice, are fit for purpose and provide enough information to all relevant people so that they can support the young person’s safety, safely and appropriately and seek review when and where needed. Individual up-to-date risk assessments must effectively address any known vulnerabilities for each young person and set out what action should be taken to address and minimise the risks, and reduce harm or the risk of harm (see [Risk Assessment and Planning Procedure](https://kentchhomes.trixonline.co.uk/chapter/risk-assessment-and-planning)). NOTE: This linked procedure was devised in line with The Children’s Homes (England) Regulations 2015, but satisfies the requirements of The Supported Accommodation (England) Regulations 2023 and therefore applies to Kent Supported Homes. The exception is section 5.1 ‘Safer Care Plan’, in which the Safer Care Plan is replaced by the young person’s ‘Placement Plan’.

# 10. Providing someone for young people to talk to

There is a strong safeguarding culture within Kent Supported Homes, where young people are listened to and respected. As has been mentioned Hosts should strive to build positive relationships with the young people they are supporting in their homes and develop a culture of openness and trust that encourages young people to be able to tell someone if they have concerns or worries about their safety.

Hosts should make available information in an appropriate form which enables young people to contact their social worker to call for a review of their Care Plan if they have concerns about their safety or welfare. Hosts – in collaboration with the young person’s social worker – should encourage them to understand they can speak to an independent advocate, Independent Reviewing Officer (IRO), Ofsted inspector or other relevant person if they have concerns about their safety.

See also: [Advocacy, Independent Visitors and Independent Reviewing Officers Procedure](https://kentchhomes.trixonline.co.uk/chapter/advocacy-independent-visitors-and-independent-reviewing-officers).

Young people will be supported by Hosts and social workers to understand what abuse is. They will be given information about how to report abuse or any concerns about possible abuse. They will be able to access in private, relevant websites or helplines such as [Childline](https://www.childline.org.uk/) to seek advice and help.

Young people will be able to identify a trusted adult who they can talk to about any concerns. When young people raise concerns, it is essential that the adults in whom they confide listen to them, take their concerns seriously and respond appropriately.

## 10.1 Hosts

All Hosts will undergo safeguarding training. Hosts need the knowledge and skills to recognise and be alert for any signs that might indicate a young person is in any way at risk of harm. The registered person (delegated to the KSH Team Manager) will ensure that skills in safeguarding are gained, refreshed and recorded on the individual Host’s electronic case file (Liberi) and that the training required is outlined in the Kent Supported Homes Workforce Plan.

Host skills for safeguarding should include being able to identify signs that young people may be at risk, and support young people in strategies to manage and reduce any risks. Hosts should encourage young people to express their views about whether they feel safe both within and outside the home. Hosts should support young people to understand how to ask for help to stay safe and that the Host’s home is an environment which supports this.

All Hosts will be made aware of and have access to the KSH Complaints, Resolution and Whistleblowing Policyand to this policy, which outline the allegations procedures in relation to safeguarding or other allegations against staff.

Supervision of Hosts’ practice should ensure that individual adults in the Host’s home are engaged in the safeguarding culture of the home and local authority so they understand what they would need to do if they found other members of the household misusing or abusing their position to the detriment of the safety of a young person.

## 10.2 KCC staff

Every young person will have an allocated social worker, whose focus is to provide oversight, support and guidance and remain aware and informed of the young person’s wishes and feelings. This includes any concerns that they might have in relation to their wellbeing, safety or health. This social worker provides consistent support of the young person and should be a safe person with whom they are able to make any disclosures around safeguarding.

Accommodation officers assigned to individual Hosts will offer an opportunity not only to the Hosts for confidential discussion around any concerns or allegations, but also to the young people with whom they will have contact from time to time. Any young person can approach an Accommodation Officer to discuss their wishes and feelings at any time and should feel comfortable doing so.

All employment of social workers and Accommodation Officers follows the usual KCC [Staffing and Safe Recruitment Procedure](https://kentchhomes.trixonline.co.uk/chapter/staffing-and-safe-recruitment) and includes training in safeguarding practices.

# 11. Self-harm

Many children and young people who come into the ‘looked after’ system will have experienced significant trauma in their lives. It is likely that these children will have multiple and complex needs and behavioural and emotional difficulties, which can lead to them acting in ways that place themselves in situations of high risk.

## 11.1 Self-harm (planning and prevention)

As part of Placement Planning, information concerning any previous self-harm or suicidal feelings should be gathered, and appropriate risk assessments put in place alongside relevant intervention strategies. The risk assessment and associated strategies should be regularly reviewed and monitored.

In situations where Hosts or other staff are involved with a young person who is actively self-harming or feeling suicidal, they should, in consultation with other members of the professional support network, ensure that all reasonable measures are taken to support the young person with the aim of reducing or preventing the continuation of the behaviour. These measures may include providing additional supervision and support, referral to specialist agencies, negotiated removal of materials that may be used to self-harm or, as a last resort, calling for assistance from the emergency Services.

A plan should also be developed to manage any impact that an incident of self-harm or suicide may have on other children and young people in the home, as well as staff and Host family members.

If there are any concerns that a child is self-harming or having suicidal thoughts, the social worker must be informed and a risk assessment undertaken (if it does not already exist) with a view to deciding whether a strategy should be adopted to reduce or prevent the behaviour. That strategy should be included in the child's Placement Plan.

Specialist advice or support (for example from children and young people’s mental health services (CYPMHS, also known as CAMHS) should be sought.

## 11.2 Self-harm (notification, recording and review)

Minor or non-persistent self-harming should be notified to the young person’s social worker at the first opportunity. If this forms a pattern of behaviour which is typical or previously known in respect of the specific young person, this may not require any specific or immediate response from the social worker, other than that which forms part of their regular reviews for the young person.

Serious or persistent self-harming or attempted suicide must be notified immediately to the Host’s Accommodation Officer, the Kent Supported Homes Team Manager and the young person’s social worker within one working day. The social worker should be consulted and consideration given to whether a child protection referral should be made.

Consideration should be given as to whether the incident is a notifiable event – see [Section 8; Process for Notifications of Serious Events Procedure (Regulation 27)](#_8._Process_for).

All self-harming must be recorded by the Host in the young person’s monthly report and by the social worker in the relevant young person’s electronic file (Liberi).

An incident report must also be completed by the relevant Host in collaboration with their Accommodation Officer.

If first aid is administered, details must be recorded in the incident report.

A serious incident of self-harm is likely to constitute a notifiable event. However, it is important that Hosts consider the frequency of any self-harm incidents and judge whether their cumulative effect makes notification appropriate even if in isolation each event would not warrant this. In particular Hosts should be alert to any patterns of behaviour or unusual behaviour which may indicate an increased risk to the young person.

The young person 's Placement Plan should be reviewed by the social worker with a view to incorporating strategies to reduce or prevent future incidents.

# 12. Online safety

Online safety or ‘e-safety’ is not just an IT issue; it is about safeguarding young people (and adults) in the digital world as part of our safeguarding responsibilities.

The focus should be on building children and young people's resilience to online risk so they can be safe and confident online. This often requires professionals, parents and carers/Hosts to build their own understanding of today's digital world.

The internet can be a great place for children and young people to play, learn and connect, but it can also put them at risk of online abuse.

Online abuse is any type of abuse that happens online. It can happen via any device that's connected to the internet i.e. computers, tablet devices, and mobile phones. It can also happen anywhere online, including:

* social media
* text messages and messaging apps
* emails
* online gaming
* live-streaming sites
* online chat rooms.

All Hosts need to understand the risks that using the internet may pose for young people, such as bullying, sexual exploitation and radicalisation. Hosts also need to be aware of the strategies KCC has in place to keep young people safe and to support them in learning how to keep themselves safe.

In relation to sexual abuse, this can include:

* Exposure to pornographic or other offensive material via the internet.
* Abusive images of children (although these are not confined to the internet).
* A child or young person being groomed for the purpose of sexual abuse.

Social networking sites can be used by perpetrators as an easy way to access children and young people for sexual abuse. The Serious Crime Act 2015 introduced an offence of sexual communication with a child. This applies to an adult who communicates with a child and the communication is sexual or if it is intended to elicit from the child a communication which is sexual, and the adult reasonably believes the child to be under 16 years of age. The Act also amended the Sex Offences Act 2003 so it is now an offence for an adult to arrange to meet with someone under 16 having communicated with them on just one occasion (previously it was on at least two occasions).

It should be noted that creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they:

* Take an explicit photo or video of themselves or a friend (under 16).
* Share an explicit image or video of a child (under 16), even if it's shared between children of the same age.
* Possess, download or store an explicit image or video of a child (under 16), even if the child gave their permission for it to be created.

However, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action is not in the public interest.

With effect from 29 June 2021, section 69 of the Domestic Abuse Act 2021 expanded so-called 'revenge porn' to include threats to disclose private sexual photographs and films with intent to cause distress.

Internet abuse may also include cyberbullying. This is when a child is tormented, threatened, harassed, humiliated, embarrassed or otherwise targeted by another person or persons using the internet and/or mobile devices. In the case of online bullying, it is possible for one victim to be bullied by many perpetrators. In any case of severe bullying, it may be appropriate to consider the behaviour as child abuse by another young person.

Radical and extremist groups may use social networking to attract children and young people into narrow ideologies that are intolerant of diversity; this is similar to the grooming process and exploits the same vulnerabilities.

Children and young people may be drawn to adopt a radical ideology through a failure to appreciate the bias in extremist material; in addition by repeated viewing of extreme content they may come to view it as normal.

## 12.1 Online safety (planning and prevention of harm)

As part of the young person’s Placement Plan, the young person’s social worker should record the required arrangements for any limitations or restrictions on contact by letter, telephone / mobile, the internet and social media. Prospective Hosts should consider what is manageable within their home, in respect of these requirements. It could be that due to the Host’s movements, level of supervision possible and technology, that meeting these requirements in their entirety is not possible within their home and this would prevent them from being considered as being able to provide a suitable home for the young person referred. For a young person who has such requirements and who is being supported in the Host’s home, their Care Plan should be updated regularly as part of their Child in Care Reviews, or more regularly if required.

Due to the nature of Kent Supported Homes being a supported lodgings service for young people with a large degree of independence, it is likely that young people will be able to exercise this without supervision in most cases. This needs to be considered when referring, to avoid any negative impacts on the wellbeing and safety of the young person. If the risks around online safety cannot be managed simply by the Hosts and with limited intervention and supervision on their part, it is likely an alternative provision of accommodation might be required.

Emergency placements of young people should consider the same factors as for those other young people accessing in a more planned way.

Seizure or confiscation of items is not possible or permitted within Kent Supported Homes and should not constitute any part of the young person’s Care or Placement Plans.

At any time, if a Host considers that a young person may be at risk from having access to the household telephones or internet provision, they must take steps to reduce or prevent the risk. This might require ‘blocking’ access to either service, for a period until this can be discussed with the young person’s social worker. When this occurs, this should be brought to the attention of the social worker within 24 hours and the Accommodation Officer notified. The social worker will then be required to communicate with the Host and young person any plan for this access to be granted again and how this will be utilised safely.

The internet is an integral part of our lives, and young people need to learn how to use the internet safely and take responsibility for their own safety. This is best achieved by providing guidance.

Young people should be supported by Hosts, where required, to learn to use the internet and social media safely, including to understand that when they use digital technology, they should not give out personal information, particularly their name, address or school, mobile phone numbers to anyone they do not know or trust. Discussions should also cover safeguarding measures young people must consider if they plan to meet someone face to face whom they have only previously met online.

Each Host household might have different rules on use of the internet and these rules can help in setting clear boundaries, using appropriate language, and expectations of the young person while in that Host’s home. These could include:

* Agreement to explain or show Hosts what they are doing online at any time;
* The need to tell someone if inappropriate content is accessed or they are upset by anyone while online;
* Agreement not to access materials which are contrary to the practises of the Host’s religious or cultural ideals.

Young people should be warned about the risks of taking sexually explicit pictures of themselves and sharing them on the internet or by inter-personal digital messaging or ‘sexting’. It is essential, therefore, that young people understand the legal implications and the risks they are taking. The initial risk posed by ‘sexting’ may come from peers, friends and others in their social network who may share the images.

Computers and web-enabled devices owned by the Host and accessible to young people, must have appropriate controls with regards to access and site-limitations and that 'firewall' and other safety filters are installed and regularly monitored and maintained.

It must be noted that the young people may have their own digital devices and it is unreasonable for Hosts to set restrictions on their use of such, unless it impacts on the emotional, psychological or physical wellbeing of others in the home. Hosts should remain willing to discuss this however, with a focus on education and harm prevention for the young person or those with whom they may be communicating.

If there are concerns about the use of internet-connected devices, which do not impact on the wellbeing of others in the home but are contrary to that which the individual Hosts allows, this should be raised with the young person’s social worker and agreement re: alternative or restricted use negotiated with the young person.

## 12.2 Photographs

Photographs might represent a significant contribution to the young person’s life history. Young people will be encouraged to keep appropriate memorabilia of their time spent living at the Host’s home, including photographs.

## 12.3 Photographs taken by young people

The widespread use of mobile phones, smartphones and tablets with cameras mean that young people living in Host’s homes will take photos of themselves and others in the home.  While it is not realistic to place restrictions on the taking of photos by young people, they should be encouraged to consider the following:

* Asking for the person’s consent / agreement before taking a photo;
* Photos should not be shared on social media without the agreement of the other person;
* The use of photos for online or cyber/online bullying is not acceptable and may lead to negotiations on restrictions being placed on their use of mobile phones in the future;
* If photos are shared via social media they should not identify other household members or the location of the home;
* When an explicit or sexual image is shared (so called ‘sexting’) the young person has no control over who it is then shared with. The sharing of such images can have far reaching consequences;
* All young people must be fully clothed before photographs are taken. No unclothed, partially clothed or sexually explicit images are to be taken or images depicting any form of unacceptable behaviour such as bullying.

## 12.4 Photographs taken by Hosts

Hosts must be sensitive to young people who do not want to have their photograph taken.

Hosts must not take photographs of young people for their personal use or sharing.

This means that Hosts should:

* Be clear why the photo is being taken and about what will happen to the images;
* Ensure the young person understands why the images are being taken and has agreed to this;
* Only use equipment which is secure and not accessible to others outside of the home;
* Always ensure that they have the young person’s permission to take and/or display photographs.

# 13. Complaints or allegations against Kent Supported Homes Hosts

Any person or worker who is aware of, or receives information, which indicates that a young person has suffered, or is at risk of suffering harm in a hosted home, must immediately refer their concerns to the Central Duty Team on 03000 41 11 11 (Out of Hours 03000 41 91 91) (this includes allegations of historical abuse where it becomes evident that a disclosure by an adult relates to a Host), or if the young person’s social worker is known, to the allocated social worker.

Any allegation made by a young person must be taken seriously and investigated so children and young people are kept safe. However, Hosts do face a risk of being the subject of false allegations and this can be extremely traumatic for those involved and their families. Concerns may be expressed by a young person, parent or professional. The Host assessment process will have explored the Host's ability to provide safe support to vulnerable young people and promote placement stability. The matching process should be completed before all placements are made and the placement agreement meeting established to outline day-to-day care support as part of the Care Plan/Pathway Plan for the young person. The young person’s plan must set out any specific behavioural issues that need to be addressed or approaches to be used. Stability meetings should be used to support placements requiring additional support and any increasing risks identified.

It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. Unnecessary delays should be avoided at each stage of the investigation.

All allegations made against a Host must be brought to the attention of the Local Authority Designated Officer (LADO) within one working day. The [online Kent LADO service referral form](https://kccchildrens.kent.gov.uk/web/portal/pages/lado#h1) should be sent to the LADO, 18+ Head of Service and Assistant Director/Registered Manager of the Kent Supported Homes Team and the IRO informed.

The duty officer/young person’s social worker/supervisory social worker receiving the referral will inform their line manager. The Local Authority Designated Officer (LADO) who has responsibility for management of allegations against the children's workforce will then be consulted. The LADO will determine (in discussion with the contacting line manager for the young person and the Host) whether the allegation/complaint is:

* A referral of child protection concern, which requires an initial strategy discussion under S47 of the Children Act 1989 (see below); or
* A safeguarding allegation which has not crossed the child protection threshold but nonetheless requires investigation by the Kent Supported Homes service;
* A complaint against the Host(s) regarding standards of support, which will be dealt with by the Kent Supported Homes service.

In all cases, deciding whether to deal with an allegation or incident as a child protection or safeguarding allegation or as a complaint requires the following considerations:

1. The nature and severity of any actual harm to the child;
2. The context in which the alleged harm occurred;
3. Whether the alleged behaviour of the Host was (i) intentional and (ii) has, or is likely to, result in harm to the young person in question or any other young person or child in the household;
4. Whether the concern relates to direct conduct towards a young person or is a more general practice issue.

The suitability and conduct of a Host may also be brought into question by their conduct or offending behaviour in their personal life in or outside of the home, including if their own children come to the attention of the statutory agencies due to abuse or neglect.

# 14. If there is a disagreement about the status of the concern

When there are disagreements about whether or not the concern is one of child protection, this will be resolved through discussion between line managers, the Local Authority Designated Officer (LADO), and 18 + Head of Service (KSH Service Manager) and the relevant Children in Care Service Manager.

# 15. Reporting concerns

The general principle is that all safeguarding concerns and any allegations must be reported.

Young people must be listened to and enabled to report any abuse or neglect at the earliest opportunity.

The following actions should be taken when there is any concern or disclosure about the welfare of a child or young person. This includes non-recent or historical abuse that may have occurred at some time in the past and may not have been previously reported or investigated.

Harm can be perpetrated by any person, including:

* Another child or young person (including serious or persistent bullying)
* A Host or member of the Host’s household
* A visitor or person in the community
* A teacher, social worker or other professional
* A parent or other family member.

Hosts should firstly make their report to their Kent Supported Homes Accommodation Officer and the young person’s social worker and/or their team manager who should inform the Kent Supported Homes team manager. If any colleagues/professionals are implicated, this should be escalated to the registered Service Manager and Head of Kent 18+ Care leavers service or ultimately the relevant Assistant Directors. In such a case the Accommodation Officer/Social Worker must notify one of the following:

* Another manager who is not implicated
* The young person’s social worker’s team manager
* Police
* The regulatory authority (Ofsted).

In an emergency, where there is an immediate risk to the young person, Hosts must take necessary action. This may involve asking for police assistance or seeking emergency medical assistance e.g. taking the young person to hospital or contacting the emergency services via 999. If the young person is taken to hospital or the police are called, Hosts must inform them that there is a suspicion of abuse or harm. Thereafter Hosts must notify the manager (or other agency) as described above.

Once notified, the designated local authority senior manager will be responsible for following the Multi-Agency Safeguarding Children Procedures for the area and making a referral to the LADO service (see [section 8, Process for notifications of serious events procedure](#_8._Process_for)).

When sharing information about a young person, it is good practice for practitioners to be transparent about their concerns and to seek to work cooperatively with the young person and their parents / Hosts.  The relevant manager should therefore usually inform parents / Hosts and the young person that they are going to make a referral.

However, referrals can be made without first informing the young person and / or their parents / Hosts where to do so would place a young person at risk. Any decision not to inform a young person or their parents / Hosts must be recorded with reasons.

The Host must keep a record of all safeguarding concerns and the actions taken by them in collaboration with and in consultation with the Accommodation Officer and the young person’s social worker.

If a child protection / section 47 Enquiry is initiated, the Kent Supported Homes team manager must inform the Regulatory Authority (see [section 8, Process for notifications of serious events procedure](#_8._Process_for)).

# 16. Receiving concerns in relation to abuse or harm

Kent County Council's Hosts are expected to provide a high standard of support for the young people to whom they provide this. Being able to promote positive behaviour and manage young people’s behaviour effectively is central to the quality of support provided in any hosted home. Negative behaviour should usually be managed through building positive relationships with young people, defusing difficult situations and avoiding situations escalating.

Hosts, and members of their household, are not allowed to use any form of corporal punishment or any measure of restraint, nor can they use discipline which is excessive or unreasonable. Behaviour management training is available for Hosts. Hosts are also expected to promote a young person’s emotional and psychological wellbeing and to avoid the use of demeaning verbal reprimands or personal criticism that undermines self-esteem.

Kent County Council has a statutory duty to refer concerns that a person has caused harm, or poses a future risk of harm to children to the Disclosure and Barring Service (DBS).

Before a referral is made to the DBS, Kent's internal procedures will be followed. The [Kent and Medway Safeguarding Children Procedures](https://kentandmedway.trixonline.co.uk/) referred to as 'KMSC Procedures' describes the internal and external processes and thresholds for action in cases where allegations are made against Kent County Council's Hosts ([section 13, Complaints or allegations against Kent Supported Homes Hosts](#_13._Complaints_or)) and these should also be applied to Kent Supported Homes Hosts.

These procedures and guidance apply whenever it is alleged that a person who works with children has, in any connection with her/his employment or voluntary 'activity with a child':

* Behaved in a way that has or may have harmed a child;
* Possibly committed a criminal offence against or related to a child;
* Behaved towards a child or children in a way which indicates that they may pose a risk of harm to children.

# 17. Support and protection standards issues

Kent Supported Homes may have concerns about a Host, which may not warrant investigation under the child protection procedures but raise significant concerns about standards of support and protection being provided. Although such concerns would not necessarily cross the threshold for S47 investigation, they may nonetheless constitute an allegation of a safeguarding concern against the Host. Support and protection standards issues might include:

* An incident of minor physical chastisement resulting in no injury;
* Inappropriate verbal communication;
* Incidents indicating inadequate safeguarding such as inadvertently allowing a young person access to alcohol, prescribed medication, or unsuitable viewing of ‘adult’ sexual material;
* Incidents indicating a lack of due care such as inadvertently barring access to prescribed medication;
* Other undertakings or omissions in respect of the support and protection standards outlined in Part 2 Quality Standards of The Supported Accommodation (England) Regulations 2023.

Support and protection standards issues should consider previous history of concerns and whether these are significant to an overall picture of risk or general conduct.

The Kent Supported Homes Team Manager must be informed of any such issues. In a situation where it is unclear whether the matter constitutes a formal allegation against a Host (as opposed to a minor support or protection standards issue) the Kent Supported Homes Team Manager should consult the LADO who will discuss and advise on allegation-management threshold and where appropriate for management by the children’s social work team, an investigation will proceed. Where necessary, a meetingmay be called to consider information-sharing, process and focus of investigation.

The plan for enquiry will depend on the nature and seriousness of the concern as well as the capacity to undertake an expedient response. Careful consideration should be given on a case-by-case basis as to whether the investigation should be dealt with by a social worker from the relevant children’s social work team who is independent of the Host or by a children’s social work team senior social worker / manager.

Depending on the nature of the concern, the children’s social work team manager and Kent Supported Homes team manager in consultation with a Service Manager, will decide **whether** the report needs to be presented to the Fostering Panel which will trigger a review of the Host’s approval so that they may make a recommendation about their continued suitability. This decision must be recorded clearly on the Host’s electronic file.

If the decision is that the report should be presented to the Fostering Panel, this should be at the next available Panel. The report and recommendations should include:

* The Host’s suitability and competence to continue to support young people;
* Matters relevant to the placement of all young people currently in the Host’s household;
* The placement of other young people in the future and any variations in approval;
* Implications for the registration of the Hosts;
* Identified training needs and additional support requirements.

It will be the responsibility of the Kent Supported Homes team manager to ensure that appropriate support is made available to the Hosts which is independent of any complaint/allegation investigation.

[Section 24, Role of the Fostering Panel](#_24._Role_of), explains what happens when a complaint is serious and may result in de-registration.

If a complaint regarding support standards has been made and concluded, the outcome of the investigation should be shared with the Host and recorded on the Host’s electronic file including:

* Details of nature and source of allegation/concern;
* Any other relevant information;
* Decision reached and reasons for this;
* If not already aware, how the persons with parental responsibility for the young people/person are to be informed.

A plan of how support standards are to be maintained should be put in place, when these will be reviewed and by whom.

# 18. Allegations of safeguarding conduct which fall below the threshold for S47 child protection investigation

Not all allegations will cross the threshold for child protection investigation under S47 (Children Act 1989). Many will fall below this threshold and will be judged to be allegations of safeguarding conduct which can be investigated internally by the young person’s social work team.

Children and Families team manager should consult with the LADO and agree the plan of investigation.

Where necessary, a meeting may be called to consider information-sharing, the process and focus of the investigation. The plan for enquiry will depend on the nature and seriousness of the allegation. Careful consideration should be given on a case-by-case basis as to whether the investigation should be dealt with by a social worker from the relevant children’s social work team who is independent of the Host or by a children’s social work team senior social worker / manager.

If the investigator is other than the young person’s social worker, then they should work in conjunction with the young person’s social worker to interview the young person. Consideration should be given to the context of the allegation, the placement history, and information on the Hosts. In some circumstances it will be appropriate for the investigation to be delegated to an alternative officer within the service.

Depending on the nature of the concern, the Children and Families and Kent Supported Homes team manager in consultation with a Service Manager will decide **whether** the report needs to be presented to the Fostering Panel which will trigger a review of the Host's approval so that they may make a recommendation about their continued suitability to provide support.

Any allegation which is deemed to be substantiated at outcome or where there are remaining considerations of risk or suitability must be taken to panel.

If the decision is that the report should be presented to the Fostering Panel, this should be at the next available Panel. The report and recommendations should include:

* The Host’s suitability and competence to provide support;
* Matters relevant to the placement of all young people currently in the Host's household;
* The placement of other young people in the future and any variations in approval;
* Implications for the registration of the Hosts;
* Identified training needs and additional support requirements.

Section 24, [Role of the Fostering Panel](#_24._Role_of), explains what happens when a complaint is serious and may result in de-registration.

If an investigation has been made and concluded, the outcome of the investigation should be shared with the Host and recorded on the Host’s file including:

* Details of nature and source of allegation/concern;
* Any other relevant information;
* Decision reached and reasons for this decision;
* If not already aware, how the persons with parental responsibility for the child(ren) are to be informed.

A plan to address any recommendations from the investigation should be put in place, when these will be reviewed, and by whom.

# 19. Allegations requiring investigation under the child protection (S47) threshold

A referral of child protection concern will involve allegations which go **BEYOND** what would be considered to be a safeguarding allegation / complaint regarding the support of a young person in placement, will have crossed the threshold for possible s47 investigation and may constitute a criminal offence in relation to the Host's conduct. See [KMSCP Section 47 Enquiry procedure](https://kentandmedway.trixonline.co.uk/chapter/child-protection-enquiries-section-47-children-act-1989)**.**

[Working Together to Safeguard Children](http://www.workingtogetheronline.co.uk/) sets out key definitions of what constitutes abuse or neglect. These are also examples of relevant conduct (harm) for young people which may be considered in making a referral to the Disclosure and Barring Service (DBS):

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

Emotional abuse is a form of harm which involves the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on the young person’s emotional development.

It may involve conveying to a young person 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 young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on young people. These may include interactions that are beyond a young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people.

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

Sexual abuse is a form of harm which involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other young people.

Neglect is a form of harm which involves the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

* Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
* Protect a young person from physical and emotional harm or danger;
* Ensure adequate supervision (including the use of inadequate care-givers); or
* Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs.

# 20. Child protection allegations – what happens?

If the matter is to be considered under the child protection process, Specialist Children's Services must discuss the case with the police at the first opportunity and inform them if a criminal offence may have been committed against a young person. This includes allegations of historical abuse where an adult makes a disclosure relating to a Host.

The team manager of the young person’s allocated social worker should make an immediate assessment of the level of risk to the young person / people in placement (and any need to move them prior to the strategy discussion) in consultation with the LADO, investigating social worker, supervising accommodation officer, and child(ren)'s social worker(s) and managers.

The close inter-relationship between local authority registered Hosts and Specialist Children's Services and the need to ensure the investigating social worker's independence should be taken into consideration in the allocation and management of any enquiries/investigation.

It is important to ensure that roles and relationships are sufficiently objective to ensure and be seen to ensure a thorough and fair process, e.g. the person undertaking the enquiries must not be the young person’s social worker, or be managed by the person with line responsibility for the young person/people.

Accusations of minor/child abuse are a serious matter, and Hosts who are the subject of such allegations are advised to seek immediate legal advice.

Hosts should also access the KSCMP procedures and Working Together to Safeguard Children.

There are three separate but related aspects to the procedures. These are:

* The child protection investigation, including consideration of whether a referral should be made to the DBS;
* Any criminal investigation which may take place;
* The consideration of the Host's registration with Kent County Council by the Fostering Panel and any other relevant registration or work undertaken. This will take place whenever there is an allegation or a serious concern regardless of the outcome of the investigation.

Careful consideration needs to be given to the stability of young people currently in placement. Any decision to remove young people should be based on considered judgement of the individual young person’s needs balanced against presenting risks. Young people should not be automatically removed. However, no new young people will be placed with a Host until each of these three processes of the investigation have been completed.

It is recognised that an investigation into allegations of abuse against a Host are traumatic and can have serious implications for the wellbeing and livelihood of a Host family and therefore a conclusion should be reached at the earliest opportunity. It is essential that the Children and Families team manager overseeing the social worker responsible for the investigation monitors the case and addresses any delay. The Children and Families team manager should liaise with their equivalent (i.e. in the area the young person originates from or Host district) and the Kent Supported Homes team manager. Hosts are to be kept informed of the process of the enquiry by their Accommodation Officer or the investigating social worker and they should be given an estimated timescale.

Ofsted must also be notified of the instigation and outcome of any child protection enquiries and any serious complaint about an approved Host. Consideration and discussion with the LADO should take place in the case of any other allegation/area where unclear (i.e. re notification).

# 21 The initial strategy discussion meeting - who attends and what is discussed?

Where allegations of deliberate harm are made or there are concerns that a Kent Supported Homes Host may pose a risk to young people, a children and families manager from where the child is allocated, should ensure that an initial strategy discussion takes place within 24 hours (this may be by telephone). If emergency action is required immediately, the Strategy Discussion should be convened as soon as possible. The purpose of the Strategy Discussion is to consider the concern or allegation and plan any subsequent enquiries and/or protective action. The Initial Strategy Discussion should involve the following:

* The Local Authority Designated Officer (LADO) or nominee;
* The manager for the allocated social worker team will chair (unless there is a complex situation/conflict of interests, when the Service Manager should chair);
* The accommodation officer for the Host
* The young person’s social worker and the team leader;
* The social worker of any other child or young person placed in the household;
* A representative from the Police Combined Safeguarding team in the area where the Host is normally resident or the central referral unit.
* Health and wellbeing of the child.

And, as appropriate:

* The local consultant community paediatrician (where a medical examination may be considered);
* Any other involved professional (such as a school representative, community paediatrician etc.) who has relevant information to contribute;
* OFSTED representation;
* The Independent Reviewing Officer.

In some circumstances it may be prudent for the allocated social worker's team manager to liaise with a duty manager in the area where the Host lives and seek their assistance in undertaking the investigation. The chair should decide whether to seek legal consultation, including any need to refer to the council's insurers.

In addition to planning enquiries in accordance with strategy discussion procedures the meeting should consider the following:

* The allegation and its context;
* The background, including any other previous allegations made against the Host(s) or their family;
* The background of the alleged victim, including any previous allegations;
* Any proposed new placements with the Host will not be made pending the outcome of the enquiry;
* Removal of children or young people should not be an automatic course of action - the decision making should be in the context of the best interests of the children/young people and the information available, balanced against presenting risks. Any decision to remove a child or young person should be agreed by the Service Manager. Consideration should be given and plans made for how "goodbyes" and Contact Arrangements/Family Time are to be managed in the event of removal (of children);
* Other children or young people currently living in the Host's household, including the Host’s own children, and those previously placed with the Hosts (including the need for strategy discussions with regard to any of these children or young people) and what information to be given;
* Any other children or young people the Host may have contact within other roles e.g. as a child minder or youth worker;
* The recognition of the Host’s status, as co-workers and individuals who have a right to be heard;
* Who will inform the parents/Hosts of the allegation and provide information and the timing of such actions;
* The support and information to be provided to the children/young people in the placement, including the Host's children e.g. use of advocates; the role of the Accommodation Officer and alternative sources of support. All parties need to understand that the focus for the Accommodation Officer is the young people and that they will be unable to provide unconditional support to the Host (see [Section 26; ‘Support for Hosts who have had allegations or serious complaints made against them’](#_26._Support_for)).
* Whether to initiate Complex (Organised or Multiple) Abuse procedures. See [**Kent and Medway Safeguarding Children Procedures**](http://www.proceduresonline.com/kentandmedway/);
* The continuation of payments to Hosts;
* Consideration of what support should be provided for the Hosts during this process.

The meeting may decide:

* That there is insufficient information available on which to proceed and that further enquiries need to be made in order to determine what further action is required; who will undertake the enquiries and when they should be completed;
* That the allegation/concern is not substantiated and no further action will be taken in relation to the referral;
* No further child protection action will be undertaken; however the concerns remain a safeguarding allegation and will be investigated in line with [Section 18, ‘Allegations of safeguarding conduct which fall below the threshold for S47 child protection investigation’](#_18._Allegations_of)above as an allegation which falls within internal Kent Supported Homes investigation process;
* That a Child Protection Investigation should be undertaken. This will be managed in accordance with the [**Kent and Medway Safeguarding Children Procedures**](http://www.proceduresonline.com/kentandmedway/). A police officer and a social worker will investigate the allegation and report back to the Strategy Discussion meeting. The investigating social worker, together with a senior practitioner, will carry out an assessment of the Host family, paying attention to the risks to, and needs of the family, including children who have significant contact with the Hosts.

During the course of the investigation Hosts have the right to the following information in writing:

* Details concerning the nature of the allegations (timing will be dependent upon the police and Specialist Children's Services investigation);
* Contact details for the relevant managers;
* A copy of the procedures being followed;
* A written statement about existing placements;
* A written statement about financial arrangements;
* Support records made available to the investigation;
* An indication of the timescale for the investigation;
* Details of independent support and how this may be accessed;
* Details in writing of all decisions made and actions taken;
  + The strategy meeting must identify those responsible for these actions and the relevant timescales. If evidence has been gathered at this point that relevant conduct has taken place then the LADO will advise referral to the Disclosure and Barring Service and consideration will be given as to who is best placed to make this.

NOTE: All Hosts are also entitled to make a written statement to Kent Supported Homes Team (this may be disclosable in a criminal trial);

# 22. Outcome strategy discussion

A strategy discussion must be held at the conclusion of an enquiry to:

* Ensure all information is shared;
* Confirm all actions agreed in previous strategy discussion(s) have been completed;
* Agree the conclusion of the enquiry i.e. alleged abuse has taken place (papers may or may not be forwarded to the CPS); that the investigation is not being further pursued under S47, but the investigation requires completion by the fostering agency; that alleged abuse has not been proven but concerns remain (may be support standards issues that need to be addressed); that the allegation was not founded;
* Ascertain whether children in care will remain, or return to the placement;
* Identify whether and how to protect any children and young people in the home, including whether an initial child protection conference is required in respect of the Host’s own children;
* Consider counselling/therapeutic needs of those affected;
* Identify who will inform the Hosts of the outcome of the investigation against them and what they will be told, including any further actions outstanding.

The concluding record of the strategy discussion must be authorised by the Service Manager, placed on both the child(ren)/young person's and Host's files, and within 2 weeks of the meeting sent to the:

* LADO;
* Service Manager in the local area.

Where evidence indicates significant concerns about suitability towards continued work with children, the LADO will advise referral to the Disclosure and Barring Service and consideration will be given as to who is best placed to make this.

# 23. Child protection conference

Where the final strategy meeting decides there is a need for a child protection conference this should be held in accordance with KMSC procedures. This must take place within 15 working days.

Reasons for diverging from these timescales must be fully recorded together with a plan of action detailing alternative arrangements.

Normally Hosts will be invited to attend the conference. Details about conference membership and exclusions can be found in the Child Protection Conference procedure of the [KMSC Procedures](https://kentandmedway.trixonline.co.uk/chapter/child-protection-conferences).

The social worker must facilitate Host(s) constructive involvement by ensuring in advance of the conference that they are given sufficient information and practical support to make a meaningful contribution including the sharing of their report at least 48 hours beforehand.

The social worker must explain to the Hosts the purpose of the meeting, who will attend, the way in which it will operate, the purpose and meaning of a child protection plan and the complaints process.

Preparation should include consideration of childcare arrangements to enable the attendance of Host(s). Written information should be left with the family regarding conferences, the right to bring a friend, supporter (including an advocate) or solicitor (in role of supporter), details of any local advice and advocacy services and the conference complaints procedure. Kent County Council has leaflets to support this.

The role of the supporter is to enable the Host to input their point of view, not to take an adversarial position or cross-examine participants. The Host needs to be aware that the supporter will hear personal information about child(ren), Hosts and partners.

Matters that will be considered are set out in KSCMP Procedures.

A copy of the written record of the conference should be sent within 10 working days of the conference to all those who attended or were invited to attend, including family members (except for any part of the conference from which they were excluded).

When a friend, supporter or solicitor has been involved, the chair should clarify with the Host whether the record should be provided for those individuals.

This conference record and recommendations should include:

* Matters relevant to the placement of all children/young people currently in the Host/’s household;
* The placement of other young people in the future;
* Implications for the registration of the Host/s;
* Whether referral to the Disclosure and Barring Service is necessary, and agree who will make the referral;
* Identified training needs and additional support requirements;
* Whether police are continuing with criminal enquiries against the Host/s.

The manager responsible for the enquiry must ensure that a letter is sent to parents and Hosts outlining conclusions made and actions to be taken. A copy of this should be placed on the Host/’s file.

The young person’s social worker will ensure that the young person understands that the allegation has been looked at thoroughly, and share appropriate information about the outcome.

Complaint Procedure - eligibility and process around complaints about specified aspects of the child protection conference is set out in KMSC Procedures.

# 24. Role of the Fostering Panel

The Kent Supported Homes service will re-assess the status of the Host/s within 28 working days of the conclusion of the enquiry.

The supervising accommodation officer and the investigating social worker must present a report to the panel for a review of the Host's approval following any child protection allegation or serious complaint. Their (social worker’s) manager should also attend. The report will address:

* Findings of the enquiry;
* Whether a report has been forwarded to the CPS;
* What, if any, concerns remain;
* Feelings and experience of the Host;
* Opinions of the Accommodation Officer;
* Training issues;
* Any other issues relevant to an annual review;
* Other information relevant to the young person/people in placement;
* Consideration of suitability and possible referral to vetting/barring scheme (DBS).

The report must include an account of the allegations, the investigation and the subsequent recommendations and decisions of the outcome strategy discussion. It will also include information about prior placements, the way these were managed and the circumstances of placement endings, and information about the Host's supervision/support and training. The report should include the views of the Hosts regarding the allegation and the ensuing investigation. The report should conclude with the recommendation of the investigating social worker regarding the continued approval of the Host and the terms of approval. Social media checks should be undertaken if there is clear rationale for this.

Hosts can submit their own written comments to be included with the report.

The panel must consider the following information prior to drawing its conclusions:

* The review report and recommendations;
* Any written submission by the Host/s;
* Minutes from any relevant child protection conference;
* The record of the concluding strategy discussion.

This process provides the Host with the opportunity to reflect on their experience and consider what action they might wish to take. They must be informed of the panel date and information on the complaints and access to files procedures.

Being the subject of allegations or serious complaints can be a very stressful experience for Hosts and their families. The Kent Fostering Panels therefore give Hosts the choice of whether to attend or not, and will respect their wishes and feelings about attendance. If there are concerns about the Host/s’ continuing registration following any child protection or complaint investigations, the Host will be notified. The Host will then write to the Kent Supported Homes team manager with their decision about whether they wish to attend the Fostering Panel. The Host may decide to bring a family member or colleague carer along for support on the day. Their supervising Accommodation Officer will always attend, regardless of whether the Host wishes to be there or not.

The panel's recommendations are forwarded, via the panel minutes, to the Agency Decision Maker. If the Decision Maker considers that the Host’s Terms of Approval should remain the same, then the Host will be notified. However, if the proposal is to change the Host’s terms or to de-register them then the Decision Maker will make a "qualifying determination". The Host will be sent a letter informing them of the decision and right to appeal. Within 28 working days of receiving the letter, the Host/s must either:

* Confirm to the Decision Maker that they have accepted the determination; or
* Request that their case is reconsidered by the Fostering Panel.

If the Host/s choose to have their case reconsidered at the Fostering Panel, they may attend the panel with the worker if they wish.

The Panel will make appropriate recommendations as follows:

* Immediate re-instatement of Host/s, if approval and use for placements has been suspended;
* Re-assessment of the Host/s in relation to the identified concerns;
* Host remaining on hold pending the decision of the CPS;
* Host choosing to withdraw;
* Concerns are sufficiently serious to warrant termination of approval.

Recommendations may include changes to the approval of Hosts, review and/or training recommendations, or address specific matters within the hosted home.

A final recommendation about the Host’s registration will be made to the Decision Maker by the Panel.

If concerns were sufficiently serious to warrant termination of approval, or the Host chooses to withdraw because termination of approval is likely, then a referral has to be made to the Disclosure and Barring Service. The Disclosure and Barring Service will consider inclusion of the individual on the relevant barred list(s).

A copy of the final outcome will be put on the Host’s file.

# 25. Action on the conclusion of a case

The Kent Supported Homes Manager will inform the LADO of the outcome of the allegation including the outcome of the review of the Host's approval. An outcome form will be provided for this purpose by the LADO.

If the allegation is substantiated and the person is no longer approved to host, the LADO will advise on referral to the DBS for consideration of barring and who is best placed to make this referral.

On conclusion of an enquiry into allegations against Hosts within these procedures, an Outcome Meeting will be arranged between representatives from the Kent Supported Homes Service and the Hosts to review the investigation, the findings and decisions made, and to inform the Hosts of any further action.

The Host’s file must record details of any complaints/allegations and the outcome.

The Kent Supported Homes team manager must keep a record of all allegations/complaints against Hosts.

# 26. Support for Hosts who have had allegations or serious complaints made against them

Allegations and serious complaints against Hosts have the potential to impact upon the Host families’ wellbeing and it would be undesirable for the experience of the Host in respect of any allegations processes, to make them feel separate or isolated from the service whilst undergoing such processes.

## 26.1 Alternate Accommodation Officer support

Any Host who is subject to any procedures or investigation around allegations or serious complaints made by any party, have a right to be offered support from an Accommodation Officer, other than that currently allocated to them for their day-to-day supervision and support. This can be requested by the Host and the Accommodation Officer who provides this support will be co-ordinated by the Kent Supported Homes Manager.

This approach should ensure that the Host feels that they are able to communicate freely with the Accommodation Officer, without impacting on the existing relationship they have with their allocated Accommodation Officer. It will also avoid conflicts of interest with any investigations which might include input or opinions of their allocated Accommodation Officer.

## 26.2 Independent counselling

In exceptional circumstances it may be agreed by the Kent Supported Homes Registered Manager to offer face to face counselling from an independent, qualified counsellor.

# 27. Role of the allocated KSH Accommodation Officer

The role of the Accommodation Officer should be to:

* Be informed of the allegation from the outset;
* Attend the strategy discussions;
* Link with investigating social workers about when to make contact with the Host(s);
* Contact the Host as determined at the strategy discussion;
* Ensure the Host receives appropriate information and advice;
* Attend any follow up interview with the Host and their family unless this is judged inappropriate.

# 28. Payment of fees

In recognition of the financial hardship that may be encountered by Hosts while an allegation or complaint is being investigated, the following protocols apply:

* When a young person is removed from a Kent Supported Homes Host’s home, pending the outcome of an investigation, the rent element will continue to be paid to the Host, with a 20% uplift until the case is presented to the Fostering Panel or for a 12 week period if the case has not yet been resolved. If other referrals are put on hold then the rent element plus 20% will be paid for one of the other vacancies;
* When an allegation is made against a Host where there are currently no young people in placement, and placements are put on hold, the rent element plus 20% uplift will be paid for up to two vacancies until the case is presented to the Fostering Panel, or for a 12 week period, if the case has not yet been resolved.

The same principles apply to Respite Hosts, who will be paid pro-rata.

Responsibility for the cost of payment remains with the relevant district(s) connected with the Host at the time the allegation or complaint is made. The Kent Supported Homes Accommodation Finance Officer will ensure this is actioned.

The Fostering Panel will prioritise presentation of cases where an allegation has been made, and the case will be heard no later than 28 days from the conclusion of the child protection enquiry.

# 29. Moving on following allegation or complaint against a Host or member of the household

The impact of complaints and allegations on Hosts, the children and young people in their homes and those that they may be working with should not be underestimated. Consideration should be given to the steps needed to ensure effective partnership working, lessons learned and what needs to happen so that effective working relationships can be established.

Following the outcome of an allegation against a KSH Host where the outcome is one of Substantiated or Unsubstantiated a discussion must take place between the Fostering Support Team Manager / Kent Supported Homes Manager and the LADO Manager to agree whether a LADO led Evaluation Meeting is required. The default position should be that a meeting is held but there are circumstances whereby an actual meeting is not required and any required LADO oversight can be achieved by way of other methods of communication (telephone, email etc.). The Fostering / Kent Supported Homes and LADO Service should clearly record the rationale for these decisions.

After presentation to the fostering panel, of an allegation or complaint against a Host it is good practice that there will be follow up work with both the Host/s and young person. There should be an initial joint visit to both the Host/s and young person, to plan this work and any additional future interventions needed (including to children/young people who have been moved to an alternative placement).

See: [Guidelines for Social Workers Following an Allegation / Complaint Against a Foster Carer or Member of the Household](https://kentchildcare.proceduresonline.com/p_allegation_complaint.html) for the established principles and tasks for consideration which are to be applied to Kent Supported Homes Hosts processes within this policy, post allegation or complaint.

The Accommodation Officer must ensure that any allegation/complaint and ongoing work required/undertaken is discussed in the Host’s Annual Review.

The young person’s Independent Reviewing Officer must ensure that the allegation/complaint and ongoing work is considered within the young person’s review.

# 30. Allegations made against a child or young person

Abuse and harm can be perpetrated upon one child or young person by another in many different ways, including persistent or serious bullying, sexual exploitation, aggressive, exploitative or other threatening behaviour which places a child or young person at risk.

Where there is any suspicion or allegation of abuse or harm perpetrated by one child or young person upon another, the procedures in Section 15; ‘[Reporting Concerns](#_15._Reporting_concerns)’ should be followed.

Protecting the rights of both victim and alleged perpetrator is important. It may be necessary, dependent on an assessment of all the facts, to separate the alleged perpetrator and victim but it may not be possible to explain why this is necessary to the perpetrator.

Throughout the process thereafter it will be necessary to ensure that children or young people with allegations made against them are properly supported, by an independent person if appropriate or required, as well as their social worker and parent(s).

Once the investigation is complete, consideration will then need to be given to the needs and interests of both alleged victim and perpetrator, and whether counselling and/or other support should be given.

Children or young people who are known to have sexually abused other children should not be placed together unless a risk assessment has been undertaken by someone qualified to complete this.

# 31. Further sources of information

**Self-Harm – Good Practice Guidance**

[Suicide Prevention Strategy for England](https://www.gov.uk/government/publications/suicide-prevention-strategy-for-england)

[Suicide Prevention: Resources and Guidance](https://www.gov.uk/government/collections/suicide-prevention-resources-and-guidance)

[Self-harm: Assessment, Management and Preventing Recurrence NICE Guidance](https://www.nice.org.uk/guidance/ng225)

**Self-Harm – Useful Websites**

[Mind](https://www.mind.org.uk/information-support/types-of-mental-health-problems/self-harm/useful-contacts/#.Wor0ykx2uM8)

[The Mix - Essential Support for Under 25s](http://www.themix.org.uk/mental-health/self-harm)

[National Self Harm Network](http://www.nshn.co.uk/)

[Papyrus](http://www.papyrus-uk.org/)

[Young Minds](https://youngminds.org.uk/find-help/)

[NHS– Where to get help for self-harm](https://www.nhs.uk/mental-health/feelings-symptoms-behaviours/behaviours/self-harm/getting-help/)

[NHS– Help](https://www.nhs.uk/mental-health/feelings-symptoms-behaviours/behaviours/help-for-suicidal-thoughts/) for suicidal thoughts

[Self-harm: for parents and carers](https://www.rcpsych.ac.uk/mental-health/parents-and-young-people/information-for-parents-and-carers/self-harm-in-young-people-for-parents-and-carers)

**Online Safety – Useful Websites**

[KSCMP Online Safety Guide](https://www.kscmp.org.uk/guidance/online-safety) [Kent and Medway Safeguarding Children Online Safety Procedure](https://kentandmedway.trixonline.co.uk/chapter/online-safety)

[NSPCC Report Remove Tool](https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/remove-nude-image-shared-online/) - The tool enables young people under the age of 18 to report a nude image or video of themselves which has appeared online. The Internet Watch Foundation will review these reports and work to remove any content which breaks the law.

[UK Council for Internet Safety (UKCIS) Digital Passport](https://www.internetmatters.org/ukcis-vulnerable-working-group/ukcis-digital-passport/) - a communication tool to support children and young people with care experience to talk with their carers about their online lives.

[Childnet Parents and Carers Toolkit](https://www.childnet.com/resources/parent-and-carer-toolkit/) - Resources that offer practical tips and advice on different aspects of keeping children safe online.

[Talking to Your Child About Online Sexual Harassment (Children's Commissioner)](https://www.childrenscommissioner.gov.uk/report/talking-to-your-child-about-online-sexual-harassment-a-guide-for-parents/)

[The Dark Web Explained (for Professionals)](https://www.thinkuknow.co.uk/professionals/resources/dark-web-explained/)

[The Dark Web Explained (for Parents and Carers)](https://www.thinkuknow.co.uk/parents/articles/dark-web-explained/)

[Thrive Online: resources covering online safety for young people with SEND](https://www.childnet.com/what-we-do/our-projects/thrive-online/" \t "_blank)

[Child Safety Online: A Practical Guide for Parents and Carers](https://www.gov.uk/government/publications/child-safety-online-a-practical-guide-for-parents-and-carers) - The guide includes practical tips about the use of safety and privacy features on apps and platforms, as well as conversation prompts to help families begin talking about online safety. It also contains pointers to further advice and support.

[CEOP](https://www.ceop.police.uk/Safety-Centre/) -This is the website of the Child Exploitation and Online Protection Centre (CEOP), which delivers a multi-agency service dedicated to tackling the exploitation of children. It provides advice to parents, carers and children on internet safety, an online reporting facility and the CEOP Education website (see below);

[CEOP Education (previously Thinkuknow)](http://www.thinkuknow.co.uk/)-These resources help young people, parents and carers and teachers to learn about the risks that young people may encounter whilst using the Internet. The site also includes a facility for young people to report online abuse;

[Childnet International](http://www.childnet.com/parents-and-carers) - This website provides a range of resources to help children and young people to use the internet constructively and to protect children from being exploited in the online environments provided by new technologies.

**Allegations and Complaints**

The KMSC describe the processes and thresholds for action in cases where allegations or complaints are made against Kent County Council's foster carers and the same principles apply to Kent Supported Homes Hosts. Carers/Hosts who are subject to serious complaints or allegations will be given a copy of this guidance at the time and additional copies are available from the local fostering team and Kent Supported Homes service.

['Working Together to Safeguard Children';](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2)

[The Children Act 1989 Guidance and Regulations](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1000549/The_Children_Act_1989_guidance_and_regulations_Volume_2_care_planning__placement_and_case_review.pdf)