

Operation Encompass

Supporting children through key workers

Pan-Lancashire Operational Encompass Protocol



Lancashire
Constabulary

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1. INTRODUCTION

Operation Encompass is a national initiative with the aim of helping to protect children, through better communication between the police and schools.

The purpose of Operation Encompass is to safeguard and support those children and young people who have witnessed and/or been present at a domestic incident, been identified as a vulnerable child following an incident or been subject to a missing episode. Following such an incident taking place, children will often arrive at school distressed and unprepared.

This protocol sets out a joint-agency procedure to provide support for children and young people who have been involved in an incident which would have cause to be considered a "Vulnerable Child" e.g. having experienced Domestic Abuse in their household, having been reported as missing from home or a vulnerable child by way of exploitation, neglect etc by ensuring that schools and colleges are made aware of an incident at the earliest possible opportunity.

Operation Encompass does not replace or supersede existing protocols, or singularly address child welfare. The process should always be followed in conjunction with current safeguarding procedures and practitioners' guidelines and is designed to reinforce safeguarding and ensure children's well-being is of paramount importance.

This Protocol seeks to outline the procedures which ensure that information sharing between the parties is managed in a manner that is compliant with statutory obligations and specifically data protection legislation. All schools and colleges in signing the Pan Lancashire Operation Encompass Commitment agree to implement the processes outlined in this protocol.

Operation Encompass is a partnership between Lancashire Constabulary, and designated school/ college staff, known as Key Adults. Working together to safeguard children, Lancashire Constabulary Police Officers/ Police staff will inform the Key Adults within educational establishments about any domestic abuse, vulnerable child or missing incident where the child or young person has been present. This will enable the school to take appropriate steps to support their pupil during what could be an emotionally difficult day. Key adults within the school/ college are then able to accommodate the day to lessen the impact and to support the child if they need it. In its simplest form, they are given some leeway, comfort and support. This can make a huge difference to children and allows them to have a safe space.

A database of all Key Adults will be established and shared with Lancashire Constabulary and the appropriate Pan-Lancashire¹ School Safeguarding team. Communication briefings will be sent out to Councillors, School Governors and all

parents regarding Encompass. The aims and principles of Encompass will be disseminated to police officers across Lancashire.

The information shared will be only that which is required to safeguard children including:

- Date and time of incident
- Brief circumstances
- Police action if appropriate

2. AIMS

This Protocol does not replace or supersede existing safeguarding processes or protocols rather it seeks to support these operationally. The Protocol should always be followed in conjunction with the Pan Lancashire Safeguarding Children Board's safeguarding processes as detailed in the [Pan Lancashire Policy and Procedures for Safeguarding Children Manual](#). The child's safety and welfare always remain paramount.

By sharing information under the Operation Encompass model it is hoped that children and young people who are vulnerable by means of being involved in a domestic abuse, vulnerable child and missing incidents will have access to responsive support. Schools/ colleges will receive information for

- Domestic abuse incidents
- Vulnerable child incidents
- Missing people

All of the above include children aged 4 – 17yrs.

Operation Encompass aims to ensure that appropriate school staff are made aware at the earliest possible stage in order to provide relevant and tailored support to children and young people in a way that means they feel safe and included. This early intervention can be achieved through silent or overt support, dependent upon the needs and wishes of the child; Appendix 1 provides examples of such support.

3. LEGAL REQUIREMENTS - INFORMATION SHARING AND STORAGE

Section 11(2) of the Children Act, 2004 requires Local Authorities and the Police to safeguard and promote the welfare of the children. Practitioners must have due regard to the relevant data protection principles which allow them to share personal information, as provided for in the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and UK GDPR which allows them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as "special category personal data". Where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 contains

“safeguarding of children and individuals at risk” as a processing condition that allows practitioner’s to share information.

Personal data shared must be proportionate, necessary but not excessive, and must be balanced with the consideration of privacy rights under the Human Rights Act. It must take into account any duty of confidentiality owed. A public interest in disclosure must outweigh an individual’s right to privacy.

This protocol has been developed taking into account the duty to safeguard children and the requirements of the most recent [Information sharing advice for practitioners providing safeguarding services](#) and is further supported by [Working together to safeguard children](#). Appendix 1 – Governance Arrangements for Operation Encompass Information Sharing.

It is recognised that the handling of such confidential and sensitive information needs to be dealt with in a way that is proportionate and appropriate to the needs of the child or young person. To address this each school will identify a Key Adult and a deputy; Appendix 3 outlines the Key Adult roles and responsibilities.

This role is best placed with the Designated Safeguarding Lead and their deputy as both have received training in child safeguarding and will be familiar with the management of sensitive information. It is expected that Operation Encompass information will then be stored in accordance with the storage requirements for safeguarding/child protection files. Where a child already has such a record, Operation Encompass information should be included within this.

The Key Adult will be the person available each day to receive the details of the incident and assess the type of support needed for the child; Appendix 4 details how Operation Encompass information will be managed and responded to within each school.

4. ROLES AND RESPONSIBILITIES

i. POLICE

Police officers will attend a domestic abuse, vulnerable child, or missing child incident, manage the immediate risks and complete the necessary risk assessment and Connect investigation at the scene of the incident. The risk assessment will not be shared with schools/ colleges, a summary will be provided by the police with respect to the child or young person and will include:-

- The name, age, date of birth, home address and school attended of the child
- The school/college will be told the time/ date/location of the incident and details of those involved in the incident, their relationship to the child and the child’s involvement in the incident
- An overview of what happened during the incident and the outcome

If a child or young person was present, the school/ college will be identified through discussion with the parent/carer and information will be disseminated directly by the police officer attending the incident. Where a police officer cannot identify an

educational establishment, an automated query will be sent to the respective Education Safeguarding team to ascertain the child's school.

This will lead to the Key Adult being identified from the database and the relevant information being shared to safeguard the child or young person.

The Police crime recording system will be annotated to indicate Operation Encompass protocol was followed and where email log was sent.

Incidents occurring on Friday, Saturday or Sunday will be reported to the school/ college over the weekend and will be available by Monday morning for the Key Adult.

Notifications to the Key Adult will be made during the school holiday periods, however it is recognised that an immediate response cannot be made. This information will be used to understand any significant issues for the child on their return to school/ college.

A disclosure will be made in respect of all children aged between 4 and 17 years who are in full-time education. Police will maintain a record of the log number, school, the Operation Encompass email address of the school/college to whom it has been disseminated and the date of dissemination.

ii. SCHOOLS'/ COLLEGES' RESPONSIBILITY

It is each school/ college's responsibility to ensure the details of their Key Adult and Deputy is up to date and recorded in their Local Authority's Key Adult Database. They must also ensure that there is a sufficiently trained deputy to receive the information in their absence. Should any changes be made to the Key Adult or deputy in the setting, notification should be made to their Schools Safeguarding Team:

Lancashire: MASH.education@lancashire.gov.uk

Blackburn with Darwen: cypreferrals@blackburn.gov.uk

Blackpool: encompass@blackpool.gov.uk

It is essential that Key Adults review their emails every morning to check for an Operation Encompass Notification; emails should be reviewed periodically through the day as notifications of incidents can be made at other times dependent on when the incidents take place.

Schools/ colleges must record the information they receive from the police on an incident form, which must be retained and stored using the same processes used to store child protection records within the school; Appendix 5 provides an exemplar of a paper-based template. Schools should also use this template or their secure safeguarding IT system to record the outcomes and impact of their actions.

Schools/ colleges need to be aware that in the event of any domestic homicide or serious case review the documents may be required for disclosure purposes.

5. Child Absence Following an Incident

Where a notification is made and a child is not in school/ college, the following should be considered:-

- School/ college should review the information within the police notification in the context of what they already know about the child - giving consideration to any safety or welfare concerns they may have had prior to receiving the police information.
- The Key Adult in school/ college should ring home to ask why the pupil is not in today as per standard policy. Inform the parent they are aware there was an incident at the home and offer support. If the pupil is not attending that day, ask parents when they are expected to return and a reason for absence?
- If the key adult from the school/ college cannot make contact with the parents or carer and have not received notification why the child is not in, the key adult needs to consider the next steps carefully - actions could include:-
 - **Home Visit** - The key adult may consider, at the discretion of the Designated Safeguarding Lead and/or Head Teacher to carry-out a home visit to see the child in line with their own child protection and home visiting arrangements/ policies; if concerns or risks to the child's safety are identified during the home visit, referrals to Children's Social Care and the Police may need to be made
 - **Referral to Children's Social Care** - Dependent on the circumstances of the incident and the parental response, to contact the Key Adult (following discussion with the Designated Safeguarding Lead where required) make a referral to Children's Social Care – this referral should be made in accordance with school/ college's safeguarding procedures.

When the child returns, the key adult should revisit the offer of parent/child support.

6. Cross Border Considerations

Lancashire Operation Encompass recognises that there will be children attending education settings outside the borough boundaries. Currently there is no capacity to include notifications to their schools; however, where there are safeguarding concerns local health and social care agencies will continue to be notified of incidents by the police.

7. Working with Parents

It will be important for all schools/ colleges that are signed up to the protocol to raise parent's awareness of Operation Encompass. An example letter in Appendix 6 has

been developed to support this and should be circulated to parents every school year.

It would be advisable for all schools/ colleges to update their safeguarding policies to reflect their commitment to Operation Encompass and to upload the Operation Encompass protocol to their websites.

Some vulnerable victims may want to tell someone about their experiences and are looking for help. Being involved with Operation Encompass may mean that more parents are likely to contact the Key Adult as a source of support. The majority of support to parents will take the form of a listening ear and signposting to local support services. There may be occasions, however, when the information received by the Key Adult requires immediate direct action, either because the risk to the parent and child is immediate and high; or because the parent is asking for help to leave the violence.

Where there is an immediate risk of harm to the parent and/or the child the police should be contacted - **In an emergency this should always be 999.**

The Key Adult should discuss and encourage the parent to talk to specialist services to enable them to access the right support.

Any support provided will be in line with any current child protection policy and procedure.

8. Appendices

APPENDIX 1

| SILENT SUPPORT EXAMPLES | OVERT SUPPORT EXAMPLES |
|--|--|
| <ul style="list-style-type: none"> • Flexible application of rules for example uniform, homework etc. • Understanding and flexibility in expectations in terms of:- <ul style="list-style-type: none"> - Behaviour - School/ college Work • Opportunities for one-to-one time with teacher to provide opportunities to talk for example 'helping with a job' • Review lesson plans to ensure appropriate for the child on the day • Systems for spare uniform, lunch etc. • Child knowing who they can talk to • Checking collection/ transport arrangements at end of school/ college day | <ul style="list-style-type: none"> • Using tools to understand child experiences for example • Talking to parents • Using Early Help processes to access additional support • Develop a safety planning with the child • 'Healthy Relationships' class sessions • Share information with other agencies if additional information raises concerns • |

Governance Arrangements for Operation Encompass Information Sharing

The basis on which sharing of information of this type may be justified by police is section 11(2) Children Act 2004 which requires that policing bodies (together with a number of other specified public bodies) discharge their functions having regard to the need to safeguard and promote the welfare of children.

This duty however must be considered in line with the provisions of the Data Protection Act 2018 and in accordance with UK General Data Protection Regulation (UK GDPR) and the right to private and family life under Article 8 of the European Convention on Human Rights (ECHR).

Article 8 ECHR

Article 8(1) provides that everyone has the right to respect for private and family life. Art. 8(2) requires that there be no interference by a public authority with this right except:

1. such as is in accordance with the law; and
2. such as is necessary in a democratic society in the interests of national security, public safety or the economic wellbeing of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

The sharing of information relating to domestic violence, vulnerable child or missing incidents will constitute an interference with the right under Art. 8(1) and as such must fall within the parameters outlined in Art. 8(2).

The first part of the test under Art 8(2) is met, assuming that the sharing of information is deemed lawful under the Data Protection Act 2018 (DPA) and UK GDPR (and therefore "in accordance with the law").

In relation to the second part of the test, i.e. necessity, in the current context the police would assert that the sharing is necessary to protect the health of the child, in terms of his/her emotional wellbeing and any immediate needs arising from the domestic abuse, vulnerable child or missing incident.

Necessity and proportionality under DPA and Article 8

The relevant provisions of both UK GDPR and DPA and Article 8, as cited above, each include the requirement that processing of data or interference with privacy rights is **necessary**. For disclosure of information to be necessary, it must also be **proportionate** in terms of both the information disclosed and to whom it is disclosed to ensure that the rights of the individuals to whom the information relates are not infringed. In this context such persons will include the victim, the child/children and potentially other persons (witnesses, etc.) as well as the perpetrator.

By way of example, a disclosure only to the Key Adult/Deputy at the school/ college is likely to be justified by the need to safeguard and promote the welfare of the

affected child, because the Key Adult/Deputy will have responsibility for dealing with such issues and implementing support measures; however, sending the information to a general email address accessible by all staff at the school/ college would not be lawful, because other staff would not need to know the information for the purpose of the disclosure to be met (*Clift v Slough Borough Council* [2009] 4 All ER 756, 782).

Similarly, the information which is passed on by police should be limited to **only that which is necessary** for the relevant support to be put in place by the school/ college; i.e. the school/ college does not need to know who was the perpetrator and who was the victim (although it is possible that this may unavoidably be deduced from the surrounding circumstances) and does not need details of injuries suffered or further police action which is anticipated. As a guide that only the following information needs to be passed on:-

- The date and time on which the incident occurred, along with risk grading.
- Who was involved (e.g. between parents; parental violence against another child, or vice versa; etc.)
- What involvement the child had in the incident, e.g. did they witness the incident directly / hear the incident but not see what happened / setting that child was found etc.

Sharing the above information should meet the objective of making the Key Adult/Deputy aware of the child being affected by the incident and arranging for appropriate measures/support without breaching any of the terms of DPA and Article 8.

In addition, information should only be disclosed in circumstances where it is known that the school can and will provide support to the affected child/children, and therefore it is known that the disclosure will fulfil a legitimate purpose. Accordingly, before any information is shared it must be established that the school/ college in question has in place the requisite resources to implement the support needed.

There must also be periodic reviews by Education in the Pan-Lancashire Operation Encompass team to ensure that the resources are still in place at the schools/ colleges and that the information shared is being acted upon appropriately.

Giving notice to the parties involved

Under the DPA/ UK GDPR, a lawful condition for data sharing is required. Whilst the information sharing may be undertaken on the grounds of public interest, the implied statutory powers provide a legal obligation under which information sharing may take place.

However, the parents and carers need to be made aware that a disclosure scheme has been implemented in circumstances where a domestic abuse, vulnerable child or missing incident has occurred. Consideration should be given to publicising such the scheme in collaboration with the school/ college, e.g. letters sent home from school, inclusion in school policy, relevant template policy statements are included in

appendix 7. Lancashire Constabulary will publish a Specific Privacy Notice in relation to Operation Encompass.

In addition, when the police have attended an incident, where appropriate they will notify those involved directly (including witnesses and any other person whose information will be shared) that a disclosure is being considered prior to the disclosure taking place. Any representations made by those involved must be taken into account when considering whether the disclosure is necessary in the individual circumstances of the case.

Guidance

The Home Office statutory guidance [Working together to safeguard children](#) was updated in 2018 and continues to apply to situations of this type - the police along with other agencies have a duty under section 10(8) of the Children's Act 2004 to have regard to any guidance issued by the Secretary of State.

Similarly the updated, non-statutory guidance - [Information sharing advice for safeguarding practitioners](#) - dealing specifically with information sharing continues to apply.

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

APPENDIX 3

Operation Encompass – Key Adult Responsibilities and Checklist

Name:

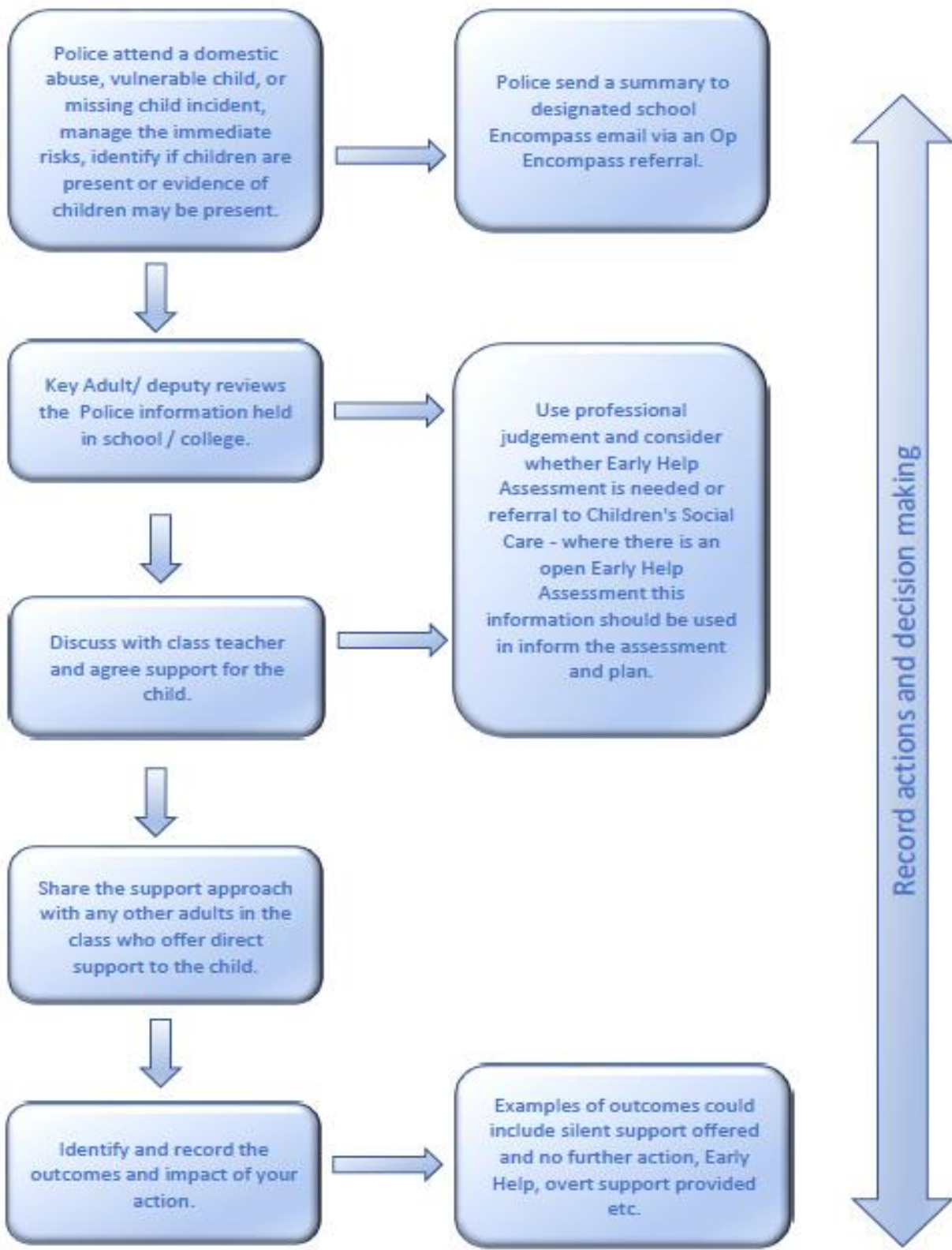
School:

Date Completed:

Review Date:

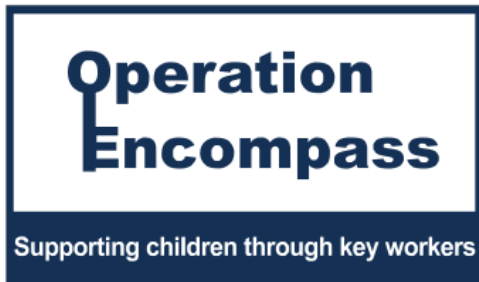
| Responsibility | School Comment | Achieved |
|---|----------------|----------|
| The Key Adult must have attended the Operation Encompass briefing or DSL training and be part of the Senior Leadership Team with Child Protection responsibility. | | |
| The Key Adult must ensure their contact details are up to date on the Operation Encompass database. | | |
| Operation Encompass records are managed and stored in the same way as other Child Protection paperwork, i.e. using safeguarding and child protection software, or in a secure and locked cabinet/drawer. | | |
| The Key Adult can identify a person/people who can deputise in their absence; the deputy must be confident in understanding all aspects of the Operation Encompass model. | | |
| The Key Adult must ensure that all teaching staff understand the confidential nature of any information passed to them and that this information must be treated in the same way as any other Child Protection information given by other partners such as Social Care. | | |
| The Key Adult must inform parents that the school/ college is part of Operation Encompass, using the example letter template provided which can be amended to meet the school's individual requirements. | | |
| The Key Adult must inform their governing authority that the school is part of Operation Encompass and the Governor with responsibility for Safeguarding should have a working knowledge of the project and impact within the school. | | |
| The Key Adult should include information about Operation Encompass in the school/ college's prospectus and safeguarding policies, thus ensuring that all parents are informed of involvement. | | |
| The Key Adult should include information about Operation Encompass on the school website. | | |

APPENDIX 4



OPERATION ENCOMPASS LOG SHEET

| | | | |
|---|--|------|--|
| Police Reference Number | | Date | |
| Child's name and age & DOB | | | |
| Date and time of incident Address | | | |
| Circumstances of incident: | | | |
| Additional school information including other Operation Encompass contacts: | | | |
| Actions taken and Impact: | | | |



DRAFT – Operation Encompass Parents Awareness Letter

Dear Parent/Carer,

This letter is to inform you / remind you that our school/ college is participating in Operation Encompass.

Operation Encompass is a unique Police and Education early intervention safeguarding partnership which ensures that a child/ young person's school/ college is informed, prior to the start of the next school day, that there has been a domestic abuse, vulnerable child or missing incident to which the child or young person has been exposed, and which might then have an impact on them in school/ college the following day.

Each school/ college is informed of all such incidents, not just those where an offence can be identified or those which are graded as high risk. The partnership recognises that all domestic abuse, vulnerable child and missing incidents can be harmful to children and young people.

This information will be shared throughout the year, including holidays and weekends. Information will only be shared with the school/ college by the police where it is identified that a young person was present, witnessed or was involved.

A nominated member of staff, known as a Key Adult, has been trained to liaise with the police. At *insert school name* our Key Adult is *insert details*. They will be able to use information that has been shared with them, in confidence, to ensure that the school makes provision for possible difficulties experienced by children or their families. The Key Adults will keep this information confidential and will only share it on a need to know basis, for instance, to teaching staff for the child or young person. It will not be shared with other school students.

This national initiative has been implemented across the whole of the Lancashire Police area. If you would like some more information about it, you can view it online at www.operationencompass.org.

We are keen to offer the best support possible for our pupils and a recent review of Operation Encompass showed that it is beneficial and supportive for all those involved.

Yours sincerely,

Chair of Governors

Head Teacher

Pan Lancashire Operation Encompass

The purpose of Operation Encompass is to safeguard and support children and young people who have been involved in or witness to a domestic abuse, vulnerable child or missing incident.

Operation Encompass has been created to address such situations that create a safeguarding risk to young people. It is the implementation of key partnership working between the police and schools/ colleges. The aim of sharing information with local schools/ colleges is to allow 'Key Adults' the opportunity of engaging with the child and to provide access to support that allows them to remain in a safe but secure familiar environment.

Following the report of a domestic abuse, vulnerable child or missing incident, by 9.00am on the next school/ college day the school's Key Adult will be informed of the child or young person's involvement. This knowledge, given to educational establishments through Operation Encompass, allows the provision of immediate early intervention through silent or overt support dependent upon the needs and wishes of the child/ young person.

The purpose and procedures in Operation Encompass have been shared with all parents and governors, is detailed as part of the school's Safeguarding Policy and published on our school website.

At *insert school details* our Key Adult is *insert details*.

OPERATION ENCOMPASS COMMITMENT

PAN LANCASHIRE OPERATION ENCOMPASS COMMITMENT

As part of _____ commitment to keeping children safe we have signed up to implement the principles and aims of the Operation Encompass Model.

In signing up to Pan Lancashire Operation Encompass the Governing Body and Senior Leadership Team:-

- Endorse the Pan Lancashire Operation Encompass Model and support the Key Adults in our schools/college to fulfil the requirements of the Operation Encompass Protocol
- Promote and implement Pan Lancashire Operation Encompass processes and use these in accordance with internal safeguarding children processes.
- Recognise the sensitive nature of the information provided and ensure that this is retained in accordance with the principles of data protection

Signature 1

Signature 2

Chair of Governors

Head Teacher