

## Safeguarding/Child Protection Policy and Procedures

Name of organisation: Progression 2Work Limited

Date of policy publication: 20<sup>th</sup> September 2018

### Policy review dates and changes

Review date	By whom	Summary of Changes made	Date implemented
26 April 18	Alison Woodgate	Policy created	26 April 18
11 Sept 18	Alison Woodgate & Joh Varley	Updates to actual names of Safeguarding Officer	11 Sept 18
20 Sept 18	Alison Woodgate & Joh Varley	New Issue Policy	20 Sept 18
28 March 19	Joh Varley	Director changes and policy review	28 March 19
19 August 19	Joh Varley & Philip Varley	Policy review	19 August 19
01 Dec 19	Joh Varley & Philip Varley	Policy review – include outreach	01 December 19
01 Sept 20	Joh Varley Philip Varley	Policy review – named deputy designated leads Covid-19 Updates to KCSIE	01 September 20
12 Sept 20	Joh Varley Philip Varley	Revised – Page 25 allegations against Staff	12 September 20
8 Jan 21	Joh Varley Philip Varley	Policy Review – named staff and designated leads changes Addition of induction training Allegation against Supply Teachers	8 <sup>th</sup> January 21
19 <sup>th</sup> April 21	Joh Varley & Philip Varley	Named Staff changes, DSL changes.	19 <sup>th</sup> April 21
23 <sup>rd</sup> April 21	Joh Varley & Philip Varley	Name of staff changes to Deputy DSL	23 <sup>rd</sup> April 21
14 <sup>th</sup> July 21	Jake Cosford	Update in line with changes to KCSIE September 2021	1 <sup>st</sup> September 21
12 <sup>th</sup> July 22	Jake Cosford	Update in line with changes to KCSIE September 2022	1 <sup>st</sup> September 2022
27 <sup>th</sup> September 22	Jake Cosford	Named Staff changes, DSL changes. Further updates to KCSIE 2022	27 <sup>th</sup> September 2022
3 <sup>rd</sup> March 23	Jake Cosford	KCSIE Updates highlights taken out and extra inputted with Low Level Concerns	3 <sup>rd</sup> March 2023
19 <sup>th</sup> July 23	Jake Cosford	2023 KCSIE updates	1 <sup>st</sup> September 23
17 <sup>th</sup> January 2024	Jake Cosford	Working Together to Safeguard Children (2023) replacing 2018	17 <sup>th</sup> January 24
7 <sup>th</sup> March 2024	Jake Cosford	Updated DSL and DDSLs	7 <sup>th</sup> March 2024

Date of next review: July 2024 or before pending Government changes

Agreed by Directors: Johanne Varley & Philip Varley

Signature: Johanne Varley & Philip Varley



Johanne Varley



**Philip Varley**

**Progression 2Work Limited staff with specific safeguarding responsibilities**

- Name of Designated Safeguarding Lead:
- **Danielle Ford (DSL) 01773 710118/ 07472 688713**
  
- Name of Deputy Designated Safeguarding Leads
- **Jason Keddy (Headteacher) 01773 710118**
- **Jake Cosford (Executive Headteacher / Director) 01773 710118/ 07429 259531**
- **Callum Varley (Director) 01773 710118**
- **Philip Varley (Director) 07543 609620 / 01773 710118**
- **Johanne Varley (Director) 07513379871 / 01773 710118**

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## 1. Introduction

This document outlines Progression 2Work Limited child protection / safeguarding policy. It applies to all adults, including volunteers working in or on behalf of the company.

Child protection is defined as safeguarding and promoting the welfare of children by:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Protecting children from the risk of radicalisation, exploitation, and other harms e.g. drugs, alcohol, gangs, neglect, serious violent crime, sexual or criminal (including county lines) exploitation,
- Ensuring children grow up in circumstances consistent with the provision of safe and effective care: and
- Taking action to enable all children to have the best outcomes.

Everyone working in, or for Progression 2Work Limited, shares an objective to help keep children and young people safe by contributing to:

- Providing a safe environment for children and young people to learn in education/employer settings.
- Identifying children who may need extra help, or are suffering or likely to suffer significant harm, and taking the appropriate action, working with other services as needed.
- Creating a culture of vigilance where we always act in the best interests of the child.

We will ensure that all staff of Progression 2Work / Schools / employers and our partner agencies are aware of our child protection policy by raising awareness at initial meetings with parents / employers / Schools and other agencies and is available as a digital or hard copy upon request.

### Policy Aims

The aim of this policy is to outline how Progression 2Work will:

- Promote a positive company ethos where children can learn, feel secure and be safe.
- Prevent unsuitable people working with children and young people.
- Promote safe practice and challenge poor and unsafe practice.
- Identify instances in which there are grounds for concern about a child's welfare and initiate or take appropriate action to keep them safe.
- Contribute to effective partnership working between parents and all those involved with providing services for children and young people.

The policy will be reviewed annually, unless an incident or new legislation or guidance suggests the need for an earlier date of review.

### Context

This policy enables Progression 2Work to carry out our functions with a view to safeguarding and promoting the welfare of children under sections 175 and 157 of the Education Act (2002). The policy is in line with the following legislation and guidance:

- [Working Together to Safeguard Children \(2023\)](#)
- [The Children Act \(1989\)](#) and [Children Act \(2004\)](#)
- [Keeping Children Safe in Education \(Sept 2022\)](#)
- [Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers \(2018\)](#)
- [Protection of Freedoms Act \(2018\)](#)
- [Data-Protection Act \(2018\)](#)
- [The Prevent Duty Guidance for England and Wales \(2015\)](#)
- [The Prevent Duty: departmental advice for Schools and childcare providers \(2015\)](#)
- [Mandatory reporting of Female Genital Mutilation – procedural information \(2015\)](#)
- [Sexual Offences Act \(2003\)](#) and [Serious Crime Act \(2015\)](#)
- [Sexual violence and sexual harassment between children in Schools and colleges \(2018\)](#)
- [Children Missing Education; statutory guidance for local authorities \(2016\)](#)
- [Mental Health and Behaviour in Schools \(2018\)](#)
- [Relationships and Sex Education \(RSE\) and Health Education \(2020\)](#)

- [Teaching Online Safety in Schools \(2019\)](#)
- [Serious Violence Strategy \(2018\)](#)
- [Promoting the education of looked-after and previously looked-after children \(2018\)](#)
- [Promoting the education of looked-after children and previously looked-after children; statutory guidance for local authorities \(2018\)](#)
- [Designated teacher for looked-after and previously looked-after children \(2018\)](#)
- [Sexual violence and sexual harassment between children in schools and colleges - GOV.UK \(\[www.gov.uk\]\(http://www.gov.uk\)\)](#)
- Sexual violence and sexual harassment between children in Schools and colleges

The policy is consistent with government guidance on Safeguarding Children.

Safeguarding is not just about protecting children from deliberate harm, neglect, or failure to act, it relates to broader aspects of care and education. This policy therefore complements and supports a range of other Progression 2Work policies, such as, but not exclusively.

- Health and safety
- Behaviour Policy
- The use of reasonable force/physical intervention
- Providing first aid
- Educational Visits
- On-Line Safety
- School Security
- Managing Allegations against staff
- Children who runaway or go missing from education, home or care procedures
- Staff Behaviour (code of conduct)
- SEND
- Relationships education (RE)/relationships and sex education (RSE) and health education (physical and mental well-being)
- Equality and Diversity
- Complaints Procedure
- Information Sharing
- Whistle Blowing
- Data Protection
- Data Security

## **Principles**

Safeguarding arrangements in Progression 2Work are underpinned by the 2 key principles:

- Everyone who comes in to contact with children and their families has a role to play in safeguarding children. This includes employers, staff, and volunteers who have a responsibility and role to play to identify concerns, share information appropriately and take prompt action. Staff members will maintain an attitude of “it could happen here” where safeguarding is concerned.
- When concerned about the welfare of a child, staff will always act in the best interests of the child. Progression 2Work operates a child centred approach considering children’s views and voices. The child’s wishes and feelings will be taken into account when determining what action to take and services to provide to protect individuals’ children through ensuring there are systems in place for children to express their views and give feedback.

## 2. Safeguarding Roles and Responsibilities of Progression 2Work Staff

All adults (including employers) working for, or on behalf of Progression 2Work have a responsibility to safeguard and promote the welfare of children. This includes:

- Responsibility to provide a safe environment in which children can learn.
- To identify children who may need extra help, have complex or serious needs or who are suffering, or are likely to suffer significant harm. All staff then have a responsibility to take appropriate action, working with services as needed. Creating a culture of vigilance where Progression 2Work staff always act in the best interests of the child.
- Taking all welfare concerns seriously and encouraging children and young people to talk to staff about anything that worries them.

Staff induction will include organisation vision, aspirations, and expectations of all staff as well as what is considered acceptable and what is not. They will also receive information about systems within Progression 2Work which support safeguarding, and copies of policies. This includes the child protection/safeguarding policy, staff behaviour policy (code of conduct), and the role of the designated safeguarding lead (DSL).

All staff will:

- Receive a copy of, read and sign to say that they have read and understood [Keeping Children Safe in Education: for School and college staff \(part 1\) \(2022\)](#) Progression 2Work leaders and those who work directly with children will also read Annex A. Those not working directly with children on a regular basis read the shortened version of Part 1. (Annex A)
- Receive safeguarding training which is regularly updated<sup>1</sup> as well as Prevent Duty and online safety training so they are equipped with the knowledge and skills to keep children safe.
- Receive regular safeguarding and child protection updates at least annually via email, e-bulletins and staff meetings to help provide them with an awareness of safeguarding issues that can put children at risk of harm (including private fostering arrangements, drug taking, alcohol abuse, family members in prison, deliberately missing education homelessness, sexting also known as 'youth produced sexual imagery', FGM, 'honour based' violence, forced marriage (the legal age of marriage being 18), sexual exploitation, serious violent crime, criminal exploitation / county line, Child on Child abuse and radicalisation/extremism), ensuring they have the relevant skills and knowledge to safeguard children effectively.
- Be aware of:
  - the early help process and understand their role in it;
  - the process for making referral to Children's Social Care and for statutory assessments that may follow this and the role they may play in such assessments.
- Know what to do if a child tells them he/she is being abused or neglected and how to share information appropriately.
- Do everything they can to support Social Workers
- Know what to do if a child shares, produces or receives a sexual communication, including sexting and youth produced sexual imagery.
- Be aware that the children are capable of abusing their peers and be clear about the companies policy and procedures on Child on Child abuse. See section 5 Child on Child Abuse.
- Know that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School and consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, simply meaning that assessments of children will consider whether wider environment factors are present in the child's life that are a threat to their safety or welfare.
- Be aware that technology is a significant component in many safeguarding and well-being issues, and that online abuse often occurs alongside face-to-face abuse.

- Staff don't need to wait for a child to make a disclosure. They should act on. Any concerns immediately Staff can ask children outright if they've been harmed and what the nature of what the harm was, noting it could be done by a group, not just an individual.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This does not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) if they have concerns about a child. Staff determine how best to build trusted relationships with children and young people which facilitate communication.

We will engender the principle that safeguarding is 'everyone's responsibility'.

All staff and volunteers should raise any concerns they have about poor or unsafe practice and potential failures in the company's safeguarding regime. These concerns will be taken by the company Directors. See the company whistleblowing procedures.

### **The Roles and Responsibilities of Senior Leadership Team**

The Senior Leadership Team has the responsibility to ensure that the School complies with safeguarding duties under legislation and will identify a Senior member to take leadership responsibility for the establishments safeguarding arrangements. Safeguarding is a standing item at all Board / Senior Leadership body meetings.

The Directors and Headteacher will ensure that.

- The School contributes to inter-agency working in line with Working Together and Safeguard Children (2018) by:
  - Act as a point of contact with the three safeguarding partners.
  - Providing a co-ordinated offer of early help when low level or emerging needs of children are identified.
  - Contributing to inter-agency support to children subject to child in need or child protection plans; and
  - Allowing access for Children's Social Care to conduct or consider conducting an assessment.
- There is awareness and due regard to the obligations of the Data protection Act 2018 and GDPR to ensure that personal information is processed fairly and lawfully and kept safe and secure and where appropriate is shared to support the safeguarding of children and individual at risk. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- The Directors will liaise with the Local Authority Designated Officer (LADO) (also known as the Designated Officer) and partner agencies in event of any allegations to abuse made against the Head Teacher.
- There is an effective safeguarding/child protection policy which is consistent with government compliance/procedures along with a Behaviour Policy and staff behaviour policy (code of conduct). This will be provided to all staff on induction, it will be updated annually, as a minimum, and be available on the Company Drop Box under Progression Policies, along with contact details of the Designated Safeguarding Lead, their deputy and their availability, including during School holidays.
- The safeguarding/child protection policy includes procedures which minimise the risk of Child on Child abuse / child on child abuse, how allegations will be investigated and dealt with and have clear process as to how victims, perpetrators and any other child affected by Child on Child abuse will be supported.
- All policies and procedures adopted by governing bodies, particularly concerning referrals of suspected abuse and neglect, are followed by all staff.
- All staff, including Directors and Volunteers, adhere to their duties in [The Prevent Duty \(2015 last updated \(2019\)\)](#) to prevent radicalisation. Keeping children safe from these risks is a safeguarding matter and should be approached in the same way as safeguarding children from other risks.
- All staff undergo safeguarding and child protection training at induction.



- The DSL and their deputies undergo training every two years (at a minimum) with an understanding that they will update their knowledge and skills at least annually to remain up to date and suitably well informed...
- The Head Teacher and other staff will undergo child protection training regularly and will receive safeguarding and child protection updates at least annually to provide them with relevant skills and knowledge to safeguard children effectively.
- Online safety: The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalization; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a School or college to protect and educate the whole School or college community. In their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.
- There is a whole School approach to online safety to address the 3 areas of risk; content; contact and monitoring systems to ensure children are safeguarded from potentially harmful and inappropriate material online, including terrorist and extremist material, as well as online safety training for staff. As technology in this area evolves and changes rapidly online safety will be regularly reviewed.
- Ensure that children are taught about safeguarding, including mental health/well-being and on-line safety (this incorporates healthy online/offline relationships sexting/youth produced sexual imagery and terrorist/extremist material), through teaching, learning opportunities and tutorials.
- People who pose a risk of harm are prevented from working with children by:
  - Adhering to statutory responsibilities to check staff working with children, taking proportionate decisions on whether to ask for checks beyond what is required and ensuring volunteers are appropriately supervised.
  - The presence of at least one person on any appointment panel who has undertaken safer recruitment training to a minimum of Level 2.
- There are procedures in place to handle allegations of abuse against staff and volunteers and that such allegations are referred to the Local Authority Designated Officer (LADO)/Designated Officer at the local authority and that procedures are in place to make a referral to the Disclosure and Barring Service (DBS) when the criteria have been met. There are also procedures in place to handle allegations of abuse by children against other children also known as Child on Child abuse.
- There are systems in place for children to report any concerns, express their views and feedback. Staff will not agree confidentially and will always act in the best interests of the child.
- A Designated Teacher with the appropriate training, relevant qualifications and experience will be appointed to promote the educational achievement of children who are Looked After or previously Looked After. All staff will have the skills, knowledge and understanding to keep Looked After Children and previously Looked After Children safe (LAC).
- There are appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions and this is consistent with [DFE Children Missing Education](#)
- Any deficiencies or weaknesses in regard to safeguarding arrangements that are brought to the companies attention are addressed without delay.

### **Roles and Responsibilities of the Headteacher**

The Headteacher will ensure that:

- The policies and procedures adopted by the company are fully implemented and followed by all staff.
- Sufficient time and resources are allocated to enable the DSL, their Deputy and other staff to discharge their responsibilities, including recording and monitoring safeguarding activities, taking part in strategy discussions, other inter-agency meetings and contributing to the assessment of children.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and concerns are addressed sensitively and effectively in a timely manner.
- The child's safety and welfare is addressed through the curriculum. This includes building pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views.
- Education Welfare Staff and Social Workers are informed immediately when a child who is looked after or subject to a child in need plan or a protection plan goes missing.
- The School fulfils the requirements of DfE Children Missing Education guidance, including those related to elective home educated children.

- They undertake appropriate training to carry out their safeguarding responsibilities effectively and keep this up-to-date.

### **The Roles and Responsibilities of the Designated Safeguarding Lead (DSL)**

The DSL is a senior member of staff who co-ordinates the company's safeguarding and child protection arrangements by providing advice and support to other staff on child welfare and child protection matters, to take part in strategy meetings and inter-agency meetings – and /or to support other staff to do so - and to contribute to the assessment of children.

Progression 2 Work will inform the School they are working with of any concerns regarding a child, so that the School can follow their safeguarding procedures. When a serious incident arises however, Progression 2Work will follow the government recommendations of immediately contacting Social Care and/or Emergency Services. The School and the company's DSL will be notified at the first opportunity.

The DSL liaises with the local authority and works with other agencies in line with Working Together to Safeguard Children (2018). Where there are serious/complex needs or child protection concerns, this includes referrals to Children's Social Care. In exceptional circumstances, i.e. in an emergency or concern that appropriate action hasn't been taken, staff members can speak directly to Children's Social Care.

The company also has a deputy DSL's to cover for when the DSL is not available; the lead responsibility however remains with the DSL During term time the DSL and / or a Deputy DSL deputies will be available during School hours for staff in the School to discuss safeguarding concerns. Adequate and appropriate cover arrangements will be made for any out of hours/out of term activities. The Designated Safeguarding Lead and/or their deputy will also be involved in anything safeguarding related in the content of relationships education/relationships and sex education and health education. In addition the Designated Safeguarding Lead will also work in partnership with the Designated Lead for Mental Health to ensure that there is an effective and consistent whole School approach for children who may be at risk of abuse or neglect and/or who may need support with their mental health.

The DSL will make all staff aware of list of factors which may indicate a child may benefit from early help which includes mental health, family member in prison/ affected by parental offending, a risk of honour-based abuse such as FGM, forced marriage (the legal age of marriage being 18) (the legal age of marriage being 18) and persistent absence from education.

See appendix 6 for further information about the Role of the Designated Safeguarding Lead (DSL).

### **Roles and Responsibilities of other company Staff**

Any concerns must be discussed with the Designated Safeguarding Lead (DSL) or Deputy DSL in DSL absence.

If staff members are unsure they should always speak to the DSL to clarify the situation and agree if any action is needed. Staff have a responsibility to record all concerns (using the company's concerns form) and forward this to the DSL or the deputy DSL. All staff will work with the DSL and where appropriate support Social Workers to take decisions about individual children.

All staff, including volunteers and temporary staff must understand how the company safeguards and promotes the welfare of children, their role and responsibilities in this and how to report any concerns. This will be covered in induction with a signed understanding of compliance.

The Directors ensure that all staff, including Directors and SLT, receive appropriate safeguarding and child protection (including online) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at Progression 2Work are effective and support the delivery of a robust whole school approach to safeguarding. Their training is be regularly updated. **It is not appropriate for the proprietor to be the DSL**

### Progression 2Work Limited staff with specific safeguarding responsibilities

- Name of Designated Safeguarding Lead:
- **Danielle Ford 07429 259531 / 01773 710118**
  
- Name of Deputy Designated Safeguarding Leads
- **Jason Keddy (Headteacher) 01773 710118**
- **Jake Cosford (Executive Headteacher) 07429259531 / 01773 710118**
- **Callum Varley (Director) 01773 710118**
- **Johanne Varley (Director) 07513 379871 / 01773 710118**
- **Philip Varley (Director) 07543 609620 / 01773 710118**

### Other Key Safeguarding Contacts

- Children's Services Professional Consultation Line 07812 300329
- Derby City Children's Social Care
  - First Contact Team 01332 641172
  - Careline (out of hours service) 01332 786968
- Derbyshire County Council (out of hours) 01629 532600
- Derbyshire County Council (Call Derbyshire) 01629 533190
- Derby City Local Authority Designated Officer (LADO) 01332 642376
- Nottinghamshire Multi Agency Safeguarding School 0300 5008090 (emergency multi agency)
- Nottingham City Safeguarding Children Partnership 01158 764762
- Nottingham City Children's Social Care 01158 764800
- Early Intervention strategy and procurement 01158 764800
- Nottinghamshire emergency (out of hours service) 0300 4564546
- Nottinghamshire Fair/Access Children missing in Education 0115 977 3225
- Nottingham City Safeguarding Children board 0115 876400 (this includes out of hours)
- Nottingham Local Authority Designated Officer child protection chairs Evelyn Hailwood - principle Manager of 0115 8764148
- LADO – Nottingham City [Tina.wright@nottinghamcity.gov.uk](mailto:Tina.wright@nottinghamcity.gov.uk) 07842601599
- Nottinghamshire County Council LADO 0115 9773921
- Derby City Channel/Prevent (radicalisation/extremism) for advice and information contact Prevent Team based at The Council House tel 01332 293111 or contact the Police Prevent Team on 101
- Derbyshire Prevent Team email [EMSOU-SB-Prevent@derbyshire.PNN.police.uk](mailto:EMSOU-SB-Prevent@derbyshire.PNN.police.uk)
- Nottingham City & Nottinghamshire Prevent email [Prevent@Nottinghamshire.pnn.police.uk](mailto:Prevent@Nottinghamshire.pnn.police.uk)
- Female Genital Mutilation (FGM) mandatory reporting via Police on 101
- Channel/Prevent Police Team 101

### Key national contacts

#### NSPCC

- NSPCC helpline - helping adults protect children 24 hours a day. For help and support, including anyone needing advice about female genital mutilation, young people affected by gangs, concerns that someone may be a victim of modern slavery contact the NSPCC trained helpline counsellors on:
  - [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
  - Text: 88858
  - 0808 800 5000

- NSPCC Whistleblowing Advice Line - free advice and support for professionals concerned about how child protection issues are being handled in their organisation.
  - 0800 028 0285
  - [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

UK Safer Internet Centre professional advice line - helpline for professionals working with children and young people in the UK with any online safety issues they may face themselves or with children in their care.

- 0844 381 4772
- [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

### **Children with SENDs:**

All students are taught to understand the difference between fact and fiction in online content and the consequences of repeating fictitious or harmful content/behaviours in school.

*The UK Safer Internet Centre has published guidance as to what “appropriate” filtering and monitoring might look like: UK Safer Internet Centre: appropriate filtering and monitoring. South West Grid for Learning ([swgfl.org.uk](http://swgfl.org.uk)) have created a tool to check whether a school or college’s filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content Your Internet Connection Blocks Child Abuse & Terrorist Content).*

### **Filtering and monitoring**

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the board of Directors are doing all that they reasonably can to limit children’s exposure online risks from the school’s IT system. At Progression 2Work we have the RM filtering and monitoring system in place and the IT manager reviews it’s effectiveness weekly. Any issues are reported to the DSL immediately. The IT manager will resolve any issues with the internet filtering system provider immediately.

The IT Manager and DSL will produce a termly report on the effectiveness of the internet filtering system termly. The leadership team and relevant staff have awareness and understanding of the provisions in place and manage on-line risks effectively and know how to escalate concerns when identified. The Directors consider the age range of the children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

All teachers/mentors must carry out a review of lesson/departmental planning to share in advance any material that may require pre-planning with the IT Manager or may cause filtering concerns eg RSHE topics that may give rise to curiosity from children for searches using school devices.

All Directors receive training in the understanding of the above.

Police Anti-Terrorist Hot Line number: 0800 789 321

### 3. Safe Environment – children are safe and feel safe

Progression 2Work adopts an open and accepting attitude towards children as part of our responsibility for pastoral care. Children, parents, and staff will be free to talk about any concerns and will see the School as a safe place when there are difficulties. Children's worries and fears will be taken seriously, and children will be encouraged to seek help from School staff

**Progression 2Work will therefore ensure that: -**

#### **Whilst within the School**

- There is an ethos where children are listened to, taken seriously, and responded to appropriately, to help them feel safe, secure and free to talk about their concerns.
  - Children are involved in the decision-making which affects them.
  - Children know that there are adults in the School whom they can approach if they are worried or have difficulties and that the School has well developed listening systems.
  - Posters are displayed which detail contact numbers for appropriate support services and child protection helplines i.e. DSCB and Childline.
  - Curriculum activities and opportunities to equip children with the skills they need to stay safe from abuse and radicalisation.
  - There is a clear written statement of the standards of behaviour and the boundaries of appropriate behaviour expected of staff and pupils (see behaviour policy/code of conduct) that is understood and endorsed by all.
  - There is an awareness that adverse childhood experiences (ACES)/trauma and other events may have an impact on children.
  - Positive and safe behaviour is encouraged among children and staff are alert to changes in a child's a behaviour and recognise that challenging behaviour and mental health problems may be an indicator of abuse or neglect.
  - Effective working relationships are established with parents and colleagues from partner agencies.
- 
- There is awareness that there may be wider environmental factors e.g. factors outside School and situations outside the family can present in a child's life that are a threat to their safety and welfare (contextual safeguarding). For example, personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and or abuse. In particular staff are knowledgeable about private fostering arrangements, family members in prison, homelessness, domestic violence, 'honour based' abuse/violence including female genital mutilation (FGM) and forced marriage (the legal age of marriage being 18) , online safety, hate crime, radicalisation, serious violence crime, child exploitation (sexual and criminal/county lines) also known as child at risk of exploitation (CRE) and Child on Child/child on child abuse such as sexual violence and harassment.
  - There is a recognition that children who do not attend regularly or go missing from education are particularly vulnerable and at increased risk of neglect and abuse.
  - Staff are appropriately trained in safeguarding according to their roles and responsibilities, have regular opportunities for safeguarding briefings and records are kept of all training undertaken.
  - Safer recruitment procedures are used to make sure that all appropriate checks are carried out on staff (and volunteers) who work with children.
  - Volunteers are appropriately supervised.
  - The environment is safe and secure; this includes ensuring all visitors to the setting are suitable and checked and monitored as appropriate.
- 
- Where the School has invited external agencies in i.e. to support delivery of subjects such as online safety, relationships /relationships and sex education and health education, there will be an agreement made in advance of the session on how a safeguarding report should be dealt with by the external visitor.



- Any groups using School premises for the provision of services to children have their own safeguarding policies, or adopt the School policy, and have satisfactorily completed all appropriate checks.
- All visiting speakers present materials appropriate to the age and maturity level of pupils, that do not insult or promote intolerance of other faiths or groups, adhere to the School's equalities policies and are not permitted to incite hatred, violence, call for the breaking of the law or promote any acts of terrorism or extremism, British Values must be promoted.

### **Whilst on work experience/outreach**

- Progression 2Work will risk assess work placements and agree appropriate procedures for employers regarding reporting non-attendance or incidents. The risk assessments are returned promptly to the School for their consideration prior to the placement commencing.
- Arrange an attendance call within 15 minutes of scheduled arrival.
- Immediate contact with Parents and School on non-attendance including evaluating reasons
- All attendance to be documented by Employer / Progression and staff.
- Ensuring employers receive a copy of the Keeping Children Safe and Taking a Disclosure company policy, for which they are required to sign prior to placement starting. These will provide an employer with an understanding that they must report any safeguarding incidents or disclosures immediately, either directly to Progression 2Work Limited or to the School.
- Ensuring employers will call the appropriate Emergency Service (e.g. Police) and/or Social Care should any significant disclosure occurs, and then immediately contact the School and Progression 2Work. This will be accompanied by a written statement from the employer about the incident.
- Progression 2Work will record all incidents of safeguarding and share this with the School as well as keep a log of them (see incident form). These will be held in compliance with the GDPR Policy.
- Progression 2Work will check that employers have knowledge of the PREVENT strategy and understand their responsibilities to uphold this. This will be done at the risk assessment stage.
- While Progression 2Work will endeavour to find work placements as near to the home of the student as possible, we cannot be responsible for policing travel arrangements or guarantee the safety of the young person whilst getting to or from the placement, this responsibility would come under the School / establishment where the student is on role.
- Young people must report any safeguarding concerns about their placement or the staff they are working with to the School or Progression 2Work (whichever they feel most comfortable approaching first) immediately, and Progression will then take the appropriate action.

### **Key Points for a child who has a concern:**

Any concerns can be shared through a variety of channels, those being:

- face to face conversations with a trusted adult
- approaching a DSL directly via the DSL Information Posters
- we proactively support our students understanding of mutual respect and the moral boundaries of their behaviours towards each other and everyone they interact with both at School and beyond. Providing clarity that any comments and actions of a sexual nature can likely constitute abuse, which would result in both a School disciplinary and Police action.

### **Whilst in a company boardroom/on company premises**

- Staff and students will follow the same procedures as they would for delivery in School as the School remain in loco parentis of the students in this situation. Progression 2Work will carry out full risk assessments of the establishment before any delivery commences.

### **Safeguarding, well-being, e-safety and RSHE as part of the Curriculum**

Through Personal Social Health Education (PSHE) and other curriculum opportunities, pupils are helped to talk about their feelings, know about their rights and responsibilities, and understand and respond to risks.

The following areas are addressed within PHSE, where appropriate, and in the wider curriculum;

- Bullying, including cyber-bullying

- Drug, tobacco and alcohol use/abuse, including ‘new psychoactive substances/NPS’
- Online/e safety, including sexting/‘youth produced sexual imagery’
- Physical health and mental well-being, including prevention i.e. fitness, healthy eating and sleep, basic first aid and changing adolescent body.
- Relationships, including families, caring/respectful friendships, respectful, healthy offline/online and intimate relationships, being safe and the law
- Child exploitation, including child sexual exploitation (CSE) and child criminal exploitation/county lines (CCE) as known as child at risk of exploitation (CRE)
- Honour based violence and forced marriage (the legal age of marriage being 18) (the legal age of marriage being 18)
- Female genital mutilation (FGM)
- Radicalisation, hate crime and extremism

### **Vulnerable Children**

We recognise that some children will be at increased risk of neglect and or abuse, particularly those with special educational needs (SEND) and disability. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

The establishment where any student is on role, must supply a student profile ensuring pertinent information is shared on any issues that need to be communicated to Progression 2work and any employer before any Work Experience placement commences.

To ensure that all children receive equal protection, we will consider factors that may increase their vulnerability, for example.

- Disabled or have special educational needs
- Living in a known domestic abuse situation
- Affected by known parental substance (drugs and/or alcohol) misuse
- Asylum seekers/refugees
- From new communities
- Living away from home, including private fostering arrangements
- Vulnerable to being bullied, or engaging in bullying
- Missing from School, particularly on repeat occasions
- Living in temporary accommodation
- Living transient lifestyles
- Living in chaotic, neglectful, and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, gender, or sexuality. LGBT children must have a trusted adult who they can be open with.
- At risk of developing mental health problems, sexual exploitation, criminal exploitation (county lines), hate crime, serious violent crim, radicalisation, or so called honour based abuse/violence including forced marriage (the legal age of marriage being 18) (the legal age of marriage being 18) and female genital mutilation (FGM)
- Are at risk of sexual exploitation (See below for further information)
- Young carers
- Looked after children
- EAL and do not have English as a first language.
- Children in the court system
- Children with family members in prison

Special consideration includes the provision of safeguarding information, resources and support services in community languages and accessible formats. Where appropriate this may also mean extra pastoral support.

**Children Missing Education (CME):**

A child going missing from education is a potential indicator of abuse or neglect. Staff should inform the role School re procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage (the legal age of marriage being 18) .

**Female Genital Mutilation (FGM):**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers.

The Mandatory reporting duty will commence in October 2015. Once introduced, teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the School's designated safeguarding lead and involve children's social care as appropriate.

**Child Sexual Exploitation (CSE) Child Criminal Exploitation (CCE):**

Both CSE and CCE are forms of abuse, and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetuated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence, or a series of incidents over time, and range from opportunistic to complex organised abuse.

It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

“The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

**Preventing Radicalisation and Extremism**

Protecting children from the risk of radicalisation should be seen as part of Schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

**Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.



Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although Schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the School. However, it should be clear to the School who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The School itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the School, we will take steps to verify the relationship of the adults to the child who is being registered.

### **Criminal Child Exploitation; county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

[County Lines Toolkit For Professionals | The Children's Society \(childrensociety.org.uk\)](https://www.childrensociety.org.uk/county-lines-toolkit-for-professionals)

### **Working with parents and carers**

We recognise the importance of working with together with parents/carers to educate as well as safeguard and promote the welfare of children.

Progression 2Work will ensure that;

- We work with parents positively, openly and honestly.

- Parents are encouraged to discuss their issues or concerns about safety and welfare of children, and they will be listened to and taken seriously.
- We will provide parents with information about safeguarding issues, such as child exploitation (sexual and criminal) known as child at risk of exploitation (CRE), mental health and online safety, including sexting/‘youth produced sexual imagery’ and terrorist/extremist material. We will also outline the support available to keep children safe within the School/college, locally and nationally.
- Up to date and accurate information is kept about pupils i.e. names and contact persons with whom the child normally lives, those with parental responsibility, emergency contact details, if different from the above those authorised to collect the child from School, name and contact details of GP, any relevant court orders or any other factors which may impact on the safety and welfare of the child.
- Information about pupils given to us by children themselves, their parents or carers or by other agencies will remain confidential. Staff will be given relevant information on a ‘need to know’ basis to support the child.
- It is made clear to parents and carers that the School has a duty to share information when there are any safeguarding concerns. Also, that there is a duty to keep records which relate to safeguarding work by the School, or partner agencies. These will be kept securely, kept apart from the main pupil record and only accessible to key members of staff. Copies of these records will be securely sent to any School which the child transfers.
- Where we have reason to be concerned about the welfare of a child, we will always seek to discuss this with the child’s parents or carers first, however there may be occasions where we are not able to do this.
- Staff are in regular contact with parents and carers. Those communications are used to reinforce the importance of children being safe online and parents and carers understand what systems we use to filter and monitor online use. Parents and carers are aware of what their children are being asked to do online, including the sites they will access and that their child will not be interacting with anyone whilst online.

#### 4. Taking Action on Concerns

Key points to remember for taking action are.

- In a significant emergency take the action necessary to help the child, for example, call 999 and Social Care.
- Do not assume a colleague or another professional will take action and share information that might be critical to keeping a child safe. Early information sharing is vital in keeping children safe.
- Report your concern to the DSL of Progression 2Work or their deputy as soon as you can and by the end of the day at the latest.
- If the DSL or their deputies are not around, ensure the information is shared with the most senior person in the School/company that day and ensure action is taken to report complex/serious or child protection concerns to Children's Social Care.
- Do not start your own investigation.
- If the concerns are about sexting/youth produced sexual imagery, do not view, copy, print or share the images. Any relevant devices should be confiscated.
- Share information on a need-to-know basis only.
- Seek support for yourself if you are distressed.
- If you are concerned about an incident, you may follow this up by speaking to your safeguarding team about the outcome.

It is **not** the responsibility of the School staff to investigate welfare concerns or determine the truth of any disclosure or allegation; this is the responsibility of Children's Social Care. All staff however have a duty to recognise where extra support is needed or where there are complex needs or child protection concerns requiring intensive or specialist support. Accordingly, all concerns regarding the welfare of pupils will be recorded and discussed with the Designated Safeguarding Lead or their deputy (or another senior member of staff in the absence of the designated lead or deputy) prior to any discussion with parents.

If you suspect a child has emerging, complex needs or there are child protection concerns There will be occasions when you suspect that a child may be at risk, but you have no 'real' evidence or that the child may need support with their mental health. The child's behaviour and or appearance may have changed, their attendance at School may have reduced, their ability to concentrate and focus may have altered, or you may have noticed other behavioural and physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Further information about abuse and neglect can be found in Appendix 1

Ensure you record these early concerns, also in writing by reporting them to the Head Teacher or Director.

##### **If information is disclosed to you**

It takes a lot of courage for a child, parent, carer or other significant adult to disclose that they are worried or have concerns. They may feel ashamed, the abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child or adult talks to you about any risks to a child's safety or wellbeing you will need to let them know that **you must** pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child or adult may think that you do not want to listen, if you leave it till the very end of the conversation, they may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the child or adult:

- Allow them to speak freely, listen to what is being said without interruption and without asking leading questions.
- Keep questions to a minimum and of an open nature i.e. 'can you tell me what happened?' rather than 'did x hit you?'

- Remain calm and do not over react – the child or adult may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – remember how hard this must be for the child or adult.
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what do other family members think about all this.
- At an appropriate time tell the child or adult that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort; it may be anything but comforting to a child who has been abused.
- Avoid admonishing the child or adult for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but they may interpret it that they have done something wrong.
- Tell the child or adult what will happen next. The child or adult may agree to go with you to see the Designated Safeguarding Lead. Otherwise let them know that someone will come to see or contact them before the end of the day.
- Report verbally to the Designated Safeguarding Lead (DSL).
- Write up your conversation as soon as possible and hand it to the Designated Safeguarding Lead.
- Seek support if you feel distressed.

If you are unsure you should always have a discussion with the Designated Safeguarding Lead to agree the best way forward.

Some disclosures may cause upset or distress. It is important that staff recognise the impact this may have on them and seek support from their line manager/ safeguarding team if necessary.

If you have on-going worries or want to know about action taken regarding your concern, your safeguarding team will be happy to speak to you about this.

**Staff must always immediately inform the Designated Safeguarding Lead (DSL) or Deputies if there is:**

- Any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.
- Any explanation given which appears inconsistent or suspicious.
- Any behaviours which give rise to suspicions that a child may have suffered harm.
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- Any concerns that a child is presenting signs or symptoms of abuse or neglect.
- Any significant changes in a child’s presentation, including non-attendance.
- Any hint or disclosure of abuse about or by a child / young person.
- Any concerns regarding person(s) who may pose a risk to children e.g. living in a household with children present.
- Any concerns about sexting or youth produced sexual imagery and/or where any adult appears to be sexually communicating (e.g. email, text, written note or verbally) with a child.
- Any concerns about Child on Child abuse, this should never be tolerated and passed off as banter, having a laugh, boys being boys, girls being girls or part of growing up.
- Information which indicates that the child is living with someone who does not have parental responsibility for them (private fostering).
- Any concerns that a child is at risk of domestic abuse, honour based abuse/violence including forced marriage (the legal age of marriage being 18) (the legal age of marriage being 18) or female genital mutilation (FGM).
- Any concerns that a child is at risk of radicalisation.
- Any concerns about child sexual exploitation or criminal exploitation, including county lines.
- Any concerns that a child or their parent/carer may be a victim of modern slavery (trafficked).

**Role of the Designated Safeguarding Lead following identification of needs or concerns**

The Designated Safeguarding Lead (DSL) will:

- Consider any urgent medical needs of the child.
- Consider whether the child has low level, emerging needs or complex needs or if there are child protection concerns.
- Check whether the child is currently subject to a child protection plan, or has previously been subject to a plan, is looked after, has child in need plan or an early help assessment (EHA) or is open to a Multi-Agency Team (MAT) or known to another agency.
- Confirm whether any previous concerns have been raised by staff.
- Consider whether the matter should be discussed with the child's parents or carers or whether to do so may put the child a further risk of harm (see below).
- If unsure that a child protection referral should be made, seek advice from Children's Social Care.
- If the concerns are about radicalisation or violent extremism, make a referral to Channel via the Police Prevent team and, where the child has complex or serious needs or where there are child protection concerns, refer to Children's Social Care.
- If a child is at risk of immediate harm, and/or where it is believed a criminal offence has been committed, refer to the Police.
- Where appropriate use relevant national, local and education based assessment tools and guidance to support the identification of needs and decision making. For example
  - [Children Safeguarding Procedures and-practice-guidance/](#)
  - [Sexting in Schools and Colleges: responding to incidents and safeguarding young people \(UKCCIS\)](#)
  - [DfE sexual violence and sexual harassment between child in Schools and colleges \(2018\)](#)
  - [Brook Traffic Light Tool](#) to support the identification of healthy and harmful sexual behaviour in children and young people

### **Notifying parents**

The School will normally seek to discuss any needs or concerns about a child with their parents or carers. This must be handled sensitively. Where an early help assessment would benefit the child and their family the most appropriate member of School staff should approach the parent/carer to take this forward. In situations where there are serious/complex needs or child protection concerns the DSL (or other nominated staff member) will make contact with the parent or carer. However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from Children's Social Care.

### **Getting help for the child**

#### **Prior to any action being taken a conversation and direction should be sought from the DSL**

If a referral to Social Care is not considered appropriate, consideration should be made to what support the child and family need. The company in liaison with the Role School will consider what support could be offered within the School, it may be useful to undertake an EHA to clarify the child's needs/strengths and the supports required and/or make a referral for other services.

### **Using the Early Help Assessment (EHA)**

Where parents, carers or children tell us that they require support, or School staff identify that there may be emerging needs and that services might be required an EHA is likely to be beneficial. In such cases staff will have an open discussion with the parents / carers and child about the support and services that might help and agree how they would be accessed.

### **Extra support (universal)**

Where the School and another service i.e. School nurse, may be able to meet the needs, take swift action and prevent needs escalating, the EHA pre-assessment checklist may, where appropriate, be completed to identify and document the needs, however the School may also use other tools to identify and help meet the needs of a family/child. This process may identify that an early help assessment may be needed and the action to be taken.

### Emerging needs

Where the child or parent are likely to require co-ordinated support from a range of early help services, or where there are concerns for a child's well-being or a child's needs are not clear, not known or not being met, staff should discuss the use of the early help (and/or other) assessment with the child and /or their parents or carers. Where a multi-agency response is needed a team around the family (TAF) should be formed to bring together practitioners from the different services so that they, along with the family, can work together to meet the child's needs. DSL will support the appropriate staff member in liaising with other agencies, setting up the inter-agency assessment and undertaking the role of lead professional as appropriate.

If Early Help and/or other support are appropriate, the case should be kept under constant review. At each stage of the process where the child's situation doesn't appear to be improving and complex needs requiring intensive support or enduring complex needs (child in need) or child protection concerns are identified requiring specialist support, a referral to Children's Social Care will be made. See below.

### Referral to Children's Social Care

**If at any point there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care and/or the police immediately. Anybody can make the referral.**

If the referral is about a 'known' case of female genital mutilation (FGM), in addition to a referral to Social Care, the individual teacher also has a mandatory reporting duty (See Mandatory Reporting of Female Genital Mutilation – procedural information - Home Office). Under this duty, 'known' cases of female genital mutilation (FGM) where a girl under 18 informs the person that an act of female genital mutilation (FGM) has been carried out on her, or where physical signs appear to show that an act of female genital mutilation (FGM) was carried out, must be reported to the Police on 101. This is a personal responsibility in addition to the referral to Children's Social Care and the professional who identifies female genital mutilation (FGM)/receives the disclosure should make the report by the close of the next working day

### Action following referral

The DSL or other appropriate member of staff will:

- Maintain contact with the allocated Social Worker.
- Contribute to the strategy discussion or meetings.
- Support any section 47 enquiries or statutory assessments that are carried out.
- Provide a report for, attend and contribute to any initial and review child protection conference.
- Share the content of this report with the parent and if appropriate the child, prior to the meeting.
- Share the content of this report with the School.
- Attend core group meetings for any child subject to a child protection plan or child in need meeting for any child subject to a child in need plan.
- Where a child on a child protection plan, child in need plan or is looked after moves from the School or School role or goes missing, immediately inform the key worker in Social Care.

### Confidentiality and sharing information

Progression 2 Work will operate with regard to [HM Government Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers \(2018\)](#)

All staff will be mindful of the seven golden rules to sharing information (See Appendix 2) and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). They should be clearly aware that the Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe.



Progression 2 Work staff should be proactive sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of a child, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

Staff should only discuss concerns with the Designated Safeguarding Lead, Deputy, Headteacher or Deputy Head (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Wherever possible consent will be sought to share information however where there are safeguarding concerns about a child, information will be shared with the appropriate organisations such as Children's Social Care. In most cases concerns will be discussed with parents and carers prior to the referral taking place unless by doing so would increase risk.

### **Record keeping**

Records of concerns documentation and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Safeguarding information will be stored separately from the child's School file.

Copies of these records will be securely sent to any School which the child is on role to or transfers to and a confirmation receipt obtained. DSL will also consider if it would be appropriate to share any information with the new education provider in advance of the child leaving.

### **Support for those involved in a safeguarding/child protection issue**

Child neglect and abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support the children and their families and staff by:

- Taking all suspicions and disclosures seriously.
- Nominating a link person who will keep all parties informed and be the central point of contact for each student.
- The DSO will keep all parties informed and be the central point of contact.
- Where a member of staff is the subject of an allegation made by a child, a separate link person will be nominated to avoid any conflict of interest.
- Responding sympathetically to any request from a child or member of staff for time out to deal with distress or anxiety.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- Storing records securely.
- Offering details of helplines, counselling or other avenues of external support.
- Following the procedures laid down in our whistle blowing, complaints and disciplinary procedures.
- Co-operating fully with relevant statutory agencies.

## 5. Child on Child abuse / allegations of abuse (including sexual violence and/or sexual harassment) made against other children

Progression 2work recognises that children may abuse their peers physically, sexually and emotionally; abuse is abuse and this will not be tolerated or passed off as 'banter', 'just having a laugh', 'boys being boys' or girls being girls, or 'part of growing up'. The setting will take this as seriously as abuse perpetrated by an adult and address it through the same processes as any safeguarding issue. We also recognise that children who abuse others and any other child affected by Child on Child abuse are also likely to have considerable welfare and safeguarding issues themselves.

### What is Child on Child abuse? \*\*

- Child on Child abuse features physical, emotional, sexual and financial abuse of a child/young person by their peers this is most likely to include but is not limited to
  - Bullying (including cyberbullying).
  - Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm.
  - Sexual violence, such as rape, assault by penetration and sexual assault.
  - Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
  - Up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
  - Sexting, also known as youth, produced sexual imagery; and
  - Initiating/hazing type violence and rituals
  - LGFL ['Undressed'](#) provides schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.
  
- It can affect any child/young person, sometimes vulnerable children are targeted. For example:
  - Those living with domestic abuse or intra-familial abuse in their histories
  - Young people in care
  - Those who have experienced bereavement through the loss of a parent, sibling or friend
  - Black and minority ethnic children are under identified as victims but are over identified as perpetrators
  - There is recognition of the gendered nature of Child on Child abuse; it is more likely that girls will be victims and boys' perpetrators. However both girls and boys experience Child on Child abuse however they are likely to experience it differently i.e. girls being sexually touched/assaulted or boys being subject to homophobic taunts/initiation/hazing (rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group).
  
- It is influenced by the nature of the environments in which children/young people spend their time - home, School, peer group and community - and is built upon notions of power and consent. Power imbalances related to gender, social status within a group, intellectual ability, economic wealth, social marginalisation etc, can all be used to exert power over a peer.
- Child on Child abuse involves someone who abuses a 'vulnerability' or power imbalance to harm another and have the opportunity or be in an environment where this is possible.
- While perpetrators of Child on Child abuse pose a risk to others, they are often victims of abuse themselves.

### Sexual Violence, Sexual Harm and Sexual Abuse

Sexual Violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, as can Child on Child abuse, they can happen online and offline (both physical and verbal) and are never acceptable. It is important that all victims are



taken seriously and offered appropriate support. Kingsmead School and Newton's Walk make it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. We do not dismiss any of the above as 'banter' 'part of growing up' 'just having a laugh' or 'boys being boys'.

It would be expected that all staff challenge behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia. Staff should never dismiss or tolerate such behaviours and risk normalising them.

### **Actions Progression will take**

Progression act to minimise the risk of Child on Child abuse by ensuring the establishment provides a safe environment, promotes positive standards of behaviour, has effective systems in place where children can raise concerns and provides safeguarding through the curriculum via PSHE and other curriculum opportunities. This may include targeted work with children identified as vulnerable or being at risk and developing risk assessment and targeted work with those identified as being a potential risk to others. See Section 3 Safe Environment; children are safe and feel safe. Also the role School will be informed.

### **Action on serious concerns**

Progression 2Work recognises that children may abuse their peers physically, sexually, and emotionally; this will not be tolerated or passed off as 'banter' or 'part of growing up'. Progression 2Work will take this as seriously as abuse perpetrated by an adult and address it through the same processes as any safeguarding issue. We also recognise that children who abuse others are also likely to have considerable welfare and safeguarding issues themselves.

Peer to peer abuse may be a one-off serious incident or an accumulation of incidents. Staff may be able to easily identify some behaviour/s as abusive however in some circumstances it may be less clear. In all cases the member of staff should discuss the concerns and seek advice from the DSL.

When an allegation is made by a child/young person against another child/young person, members of staff should consider if the issues raised indicate that the child and /or alleged perpetrator may have emerging needs, complex/serious needs or child protection concerns and follow the process outlined in Section 4. Taking Action on Concerns.

Particular considerations for cases where Child on Child abuse is a factor include:

- What is the nature, extent and context of the behaviour including verbal, physical, sexting and/or online abuse? Was there coercion, physical aggression, bullying, bribery or attempts to ensure secrecy? What was the duration and frequency? Is the incident a one off or a sustained pattern of abuse? Were other children and /or adults involved? Has a crime been committed?
- What is the child's age, development, capacity to understand and make decisions (including anything that might have had an impact on this i.e. coercion), and family and social circumstances?
- What are the relative chronological and developmental age of the two children and are there any differentials in power or authority?
- Is the behaviour age appropriate or not? Does it involve inappropriate sexual knowledge or motivation?
- Are there any risks to the child victim or alleged perpetrator themselves and others i.e. other children in School/college, adult students, School/college staff, in the child's household, extended family, peer group or wider social network?
- What are the wishes of victims in terms of how they want to proceed?
- What is the importance of understanding intra familial harms and any necessary support for siblings following incidents?

Immediate consideration should be given to how best to support and protect the victim and alleged perpetrator and any other children involved/impacted. This may include consideration of the alleged

perpetrator being removed from any classes they share with the victim, ensuring there is a reasonable distance apart within the School premises and on transport to and from the setting.

All decisions will be made in the best interests of the child and on a case by case basis with the DSL taking a leading role and using their professional judgement, supported by other agencies, such as Children's Social care and the Police as required. The DSL will refer to relevant assessment tools and guidance as appropriate such as:

- [Sexual Violence and Sexual Harassment between children in Schools and Colleges](#)
- [Sexting in Schools and Colleges: Responding to incidents and safeguarding young people](#)
- [Brook Traffic Light Tool](#)

Whenever there is an allegation of abuse, including concerns about sexual harassment and violence, made against a child, the DSL and other appropriate staff will draw together separate risk and needs assessments and action plans to support the victim and the perpetrator. These will consider:

- The victim, especially their protection and support;
- The alleged perpetrator; and
- All the other children (and if appropriate adult students and staff) at the School/college, especially any actions that are needed to protect them. [PACE Code C 2019 \(accessible\) - GOV.UK \(www.gov.uk\)](#)

All reports of Child on Child abuse (including sexual harassment and/or sexual violence) will be recorded in the child's safeguarding/child protection file. This will include all decision making, risk and needs assessment and plans must be recorded in writing as outlined in Section 4. Where appropriate incidents may be managed internally (low level needs), via early help (emerging needs) or through children's social care (complex/serious needs or child protection concerns); reports to the police will be run in parallel with Children's Social Care as outlined in the Progression 2Work safeguarding children procedures. All risk and needs assessment and action plans whether internal or multi-agency will be reviewed and updated on a regular basis. Where the victim or alleged perpetrator transfer to another education setting the DSL will ensure the new provider will be made aware of any on-going support needs (and will discuss this with the victim and where appropriate their parents, as to the most suitable way of doing this) as well as transferring the safeguarding/child protection file. In the case of the alleged perpetrator, where appropriate, this will also include potential risks to other children and staff. See Section 4 Taking Action on Concerns - record keeping.

**Any suspicion or allegations that a child has been sexually abused or is likely to sexually abuse another child (or adult) or where there are concerns about any other form of abuse, a referral must be made immediately to Children's Social Care and where appropriate the Police.**

**The law on child on child abuse is there to protect children rather than criminalise them.**

Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. All staff remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child's distress is.

At Progression 2Work we keep all policies, processes, and curriculum under constant review to protect all children. Reports of sexual violence and/or harassment (especially where there is evidence of patterns of behaviour) may point to environmental and or systemic problems that could and should be addressed by updating relevant policies, processes, or relevant parts of the curriculum. Alongside this, patterns identified in school may also be reflective of the wider issues within a local area and the DSL shares emerging trends with safeguarding partners.

### **Low Level Concerns**

The safety and wellbeing of children in Progression 2Work is dependent on the vigilance of all our staff and their prompt communication to the DSL or Head Teacher of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated. Progression 2Work is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the school setting. Please refer to our Low-Level Concerns Policy and Code of Conduct.

### **Action on Low Level Concerns**

Where a low-level concern exists, it should be reported to the DSL or to the Head Teacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (Where the concern relates to a particular incident). The Low-Level Concern Form should be completed in all cases, this is available within the Low Level Concern Policy

## **6. Safer Recruitment and Selection of Company Staff**

Progression 2Work has adopted robust recruitment and selection procedures that minimise the risk of employing people who might abuse children or are otherwise unsuitable to work with them. We complete a full range of checks which are carried out to minimise the possibility of children and young people suffering harm from those they consider to be in positions of trust.

We ensure that all appropriate measures are applied in relation to everyone who works in the company, including volunteers and staff employed by contractors. This is an essential part of creating a safe environment for children and young people.

Safer practice in recruitment means thinking about and including issues to do with child protection and safeguarding children at every stage of the process. This includes obtaining and scrutinising comprehensive information about applicants. For example, obtaining professional references, verifying academic or vocational qualifications, previous employment history, verifying health and physical capacity for the job as well as resolving any discrepancies or anomalies in references.

It also includes ensuring that advertising, job descriptions, person specifications and interview processes includes safeguarding and right to work in England checks.

Everyone who works for Progression 2Work, including volunteers will have Enhanced Disclosure and Barring (DBS) and where necessary, disqualification by association checks.

[Disclosure and Barring \(DBS\) and teacher status checks. Governors and all relevant staff will also require section 128 checks.](#)

All job adverts include: Progression 2Work's commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken • the safeguarding responsibilities of the post as per the job description and personal specification, and • whether the post is exempt from the Rehabilitation of Offenders Act (ROA) 1974. The amendments to the ROA 1974 (Exceptions Order 1975, (2013 and 2020)) provide that when applying for certain jobs and activities, certain spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. The MOJ's guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975, provides information about which convictions must be declared during job applications and related exceptions and further information about filtering offences can be found in the DBS filtering guide

DBS checks for volunteers are free.

CVs are only be accepted along side a full application form. CVs on their own will not contain all the information required for safer recruitment.

We out online searches as part of our checks on shortlisted candidates.

**Agency and third-party staff (supply staff)**

We obtain written notification from any agency, or third party organisation, that they have carried out the same checks as Progression 2Work would otherwise perform on any individual who will be working at the school (or who will be providing education on Progression 2Work's behalf, including through online delivery). In respect of the enhanced DBS check, we ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.

**'Extended School' and off-site arrangements**

Where extended School activities are provided by and managed by Progression, our own safeguarding policy and procedures apply. If other organisations provide services or activities on our site, we will check that they have appropriate procedures in place, including safer recruitment checks and procedures. When our children attend offsite activities, we will check that effective child protection arrangements are in place.

**Visitors to the School**

The School premises provide a safe learning environment with secure access. This process includes ensuring all visitors to the School are suitable and are checked and monitored as appropriate.

## **7. Safeguarding concerns and allegations made about staff (including supply staff, volunteers and contractors)**

Safe recruitment practices are vital whenever someone is recruited to work with children however this is not the end of the matter. The majority of children and the majority of people who work with children have their safety and welfare at heart, but all staff should be mindful that some individuals seek access to children in order to abuse them and that the nature of abuse means that children often don't disclose. It is crucial that everyone is aware of these issues, and the need to adopt ways of working and appropriate practice to help reduce allegations. It is also important that everyone is able to raise concerns about what seems to be poor or unsafe practice by colleagues. These concerns and concerns expressed by children, parents and others are listened to and taken seriously. Where appropriate, action is taken in accordance with procedures for dealing with allegations against staff.

It is essential that any allegation against a member of staff, or volunteer is dealt with quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is subject to the allegation.

Where an allegation is made against the member of staff, (including supply staff and volunteers) that they have:

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

### **Supply Teachers**

Whilst Progression 2Work are not the employer of Supply Teachers, we will ensure allegations are dealt with properly, under no circumstances will Progression 2Work decide to cease to use a Supply Teacher due to safeguarding concerns, without finding out the facts and liaising with Local Authority Designated Officer (LADO) to determine a suitable outcome. .

These concerns will immediately be investigated by the Headteacher, where there are concerns/allegations about the Headteacher, this should be referred to the Directors.

### **If you have concerns about a colleague**

Staff who are concerned about the conduct of a colleague towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. All concerns of poor practice or concerns about a child's welfare brought about by the behaviour of colleagues should be reported.

### **Duty to refer to DBS**

Progression 2Work will uphold our legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

### **Initial actions following an allegation**

- The person who has received an allegation, or witnessed an event, will immediately inform the School Manager (or the Directors if the allegation is against the Head Teacher) and make a record which will include time, date, place of incident, persons present, what was witnessed, what was said etc. This should then be signed and dated.
- Staff may consider discussing any concerns with the DSL and may make any referral via them.
- The Headteacher or Directors where appropriate will take steps to secure the immediate safety of children and urgent medical needs.

- The member of staff will not be approached at this stage, unless it is necessary to address the immediate safety of children.
- The Headteacher or Directors may need to clarify any information regarding the allegation, no person will be interviewed at this stage.

Some allegations will be so serious as to require immediate intervention by children social care and/or police.

- The Headteacher or Directors should immediately discuss the allegation with the Local Authority Designated Officer (LADO). This should take place within one working day; see other key safeguarding contacts list on page 10. The discussion will consider the nature, content and context of the allegation and agree a course of action.
- The Headteacher will inform the Directors of any allegation.
- Consideration will be given throughout to the support and information needs of pupils, parents and staff.
- If consideration needs to be given to the individual's employment, legal advice will be sought. Please also see complaints and whistle blowing policy.

**Procedures to be followed if further action is required:**

- The member of staff may be suspended (with a right to appeal to the Proprietors/Headteacher) if the allegation is very serious or if the safety or well-being of a child or other member of staff were judged to be at risk or if the continued presence of the accused was likely to inflict distress or fear on any members of the learning community. It is often in the interests of any staff who are the subject of a serious allegation to avoid all contact with the accusers.
- Any necessary steps to protect children or staff will be taken
- S/he may be required to leave Progression 2 Work premises until such time as the investigation is complete.
- S/he will be kept informed of the progress of any investigation
- Efforts will be made by the SLT to ensure that any member of staff subject to any allegation is receiving advice from appropriate legal or union representatives.
- Compromise agreements between the Progression 2 Work and staff must not be used in the case of any staff subject to serious allegations of abuse of children.
- At the conclusion of an investigation by an outside agency the SLT will seek a written summary of the findings of that agency. • All sensitive material gathered in the course of the investigation will be kept in the "Closed File" kept by the SLT.
- The DFE, DBS and TRA will be informed if a member of staff is dismissed and deemed unsuitable to work with children.
- A settlement agreement shouldn't stop an employer from providing a reference to potential employers when requested.

**Allegations directly involving Headteacher / Directors**

- If the allegation is against the Head Teacher, this is reportable to the Directors Joh Varley or Phil Varley with the previous procedure followed.
- If the allegation is against the Directors of the company, this would be reportable by the Head Teacher to LADO.

**Malicious Allegations**

- **If an allegation is proven to be both untrue and malicious the perpetrator/s will be permanently excluded.**

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that **does not meet the harm threshold**, then this will be shared in accordance with our low-level concerns policy.

Learning lessons applies to all cases not just those which are concluded and found to be substantiated.

### **Sharing low-level concerns**

Our low-level concerns policy contains a procedure for sharing confidentially such concerns which is clear, easy to understand and implement. All low-level concerns are shared initially with the DSL and the Headteacher. The Headteacher is the ultimate decision maker in respect of all low-level concerns, in consultation with the DSL.

Low-level concerns which are shared about supply staff and contractors are notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If we are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, the DSL will consult with LADO.

We create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.



## **Appendix 1 Types of abuse and possible indicators**

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Being more prone to peer group isolation than other children.
- The potential for children with SEN and disabilities being disproportionately impacted by things like bullying without outwardly showing signs; and
- Communication barriers and difficulties in overcoming these barriers. Similarly, where a child is black or from a minority ethnic group, aggressive behaviour, emotional and behavioural problems, and educational difficulties may be wrongly attributed to racial stereotypes, rather than abuse. Cultural and religious beliefs should not be used to justify hurting a child.

### **Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child<sup>2</sup>.

Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or they live in a home where domestic abuse happens<sup>3</sup>. Babies and disabled children also have a higher risk of suffering physical abuse.

#### **Some of the following signs may be indicators of physical abuse:**

- Children with frequent injuries.
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained.
- Bruises or cuts.
- Burns or scalds; or
- Bite marks<sup>4</sup>.

### **Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued in so far as they meet the needs of another person. It may include not giving the child 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 children. These may include interactions that are beyond the child's developmental capacity, as well as over protection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger,

<sup>2</sup> HM Government (March 2015) Working Together to Safeguard Children, page 92

<sup>3</sup> Brandon et al., (2010) Building on the learning from Serious Case Reviews: A two-year analysis of child protection database notifications 2007-2009, Department for Education, 2010

<sup>4</sup> HM Government (March 2015) What to do if you are worried a child is being abused: advice for practitioners



or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be in a position to observe it, for example in the way that a parent interacts with their child.

**Some of the following signs may be indicators of emotional abuse:**

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong.
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

**Sexual Abuse (and exploitation)**

Sexual abuse is any sexual activity with a child. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child 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 children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in a sexually inappropriate way, or grooming a child 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 children.

Many children who are victims of sexual abuse do not recognise themselves as such; they may not understand what is happening and may not understand that it is wrong.

**Some of the following signs may be indicators of sexual abuse:**

- Children who display knowledge or interest in sexual acts inappropriate to their age.
- Children who use sexual language or have sexual knowledge that you would not expect them to have.
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital or anal areas, sexually transmitted infections, or underage pregnancy.

'Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.'

**Some of the following signs may be indicators of sexual exploitation:**

- Acquisition of money, clothes, mobile phones etc without plausible explanation.
- Gang-association and/or isolation from peers/social networks.
- Exclusion or unexplained absences from School, college, or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being

Staff should also remain open to the fact that child sexual exploitation can occur without any of these risk indicators being obviously present.

Remember exploitation can take many forms, including sexual and criminal exploitation, e.g. Criminal Child Exploitation, including county lines. Children can be exploited in several ways. Child exploitation is complex and rarely presents in isolation of other needs and risks of harm (although this may not always be the case).

See [Child Sexual Exploitation Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation](#) (2017), DfE

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because 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 child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care givers)
- Ensure access to appropriate medical care or treatment

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

Children who are neglected often also suffer from other types of abuse. It is important that practitioners remain alert and do not miss opportunities to take timely action. However, while you may be concerned about a child, neglect is not always straightforward to identify.

Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have a dependency on alcohol and/or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child.

#### **Some of the following signs may be indicators of neglect:**

- Children who are living in a home that is indisputably dirty or unsafe.
- Children who are left hungry or dirty.
- Children who are left without adequate clothing, e.g. not having a winter coat.
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence.
- Children who are often angry, aggressive, or self-harm.
- Children who fail to receive basic health care<sup>4</sup>; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

### **Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is a risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day to day and identify whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how this children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the DSL or a deputy.

See links below for guidance preventing and tackling bullying, and mental health and behaviour in Schools. In addition, UK Health Security Agency and the Office for Health Improvement and Disparities (OHID) has produced a range of resources to support secondary School teachers to promote positive health, wellbeing and resilience among young people, including its guidance promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See rise above for links to all material and lesson plans.

[Preventing and tackling bullying](#)

[Mental health and behaviour in Schools](#)

[promoting children and young peoples emotional health and wellbeing](#)

[Rise Above](#)

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

## **APPENDIX 2: Issues of mental health and well being including anxiety, low esteem, eating disorders and self harm**

### **Self-harm and responding to self-harm**

What is 'Self-harm'?

- A deliberate act that causes harm to the individual
  - Self injury or self-poisoning
  - Knowingly entering or remaining in a relationship that is harmful
  - Actions may range from scratching, cutting, over-dosing and self-poisoning, punching walls or objects, banging heads, self-scalding. It could include deliberate behaviour to encourage ill health.
  - At the extreme there may be a risk of suicide or self-harm that can lead to serious injury or death.
- Most cases will not be this extreme, but those who do self-harm are statistically at higher risk of suicide.

What are the signs of self-harm?

There are many potential 'signs' but we are often alerted by direct observation or indirectly via concerned friends or relatives.

- Wearing long sleeves or trousers even when very warm
- Keeping or trying to obtain sharp objects or substances that could be used for self-harm
- Seeming to be very 'down', distracted, distanced or introverted.

### **Why do young people self-harm?**

There are many possible reasons. It is important not to assume that it is merely some form of attention seeking or manipulative behaviour.

- To externalise some form of trauma or anxiety
- Self-harming can give a sense of control – a way of managing tension or stress.
- As a reaction to poor levels of self-esteem
- As a response to anxiety caused by family splits or relationship issues.
- As a response to bullying
- As a response to depression and anxiety
- It can be an addictive behaviour
- Sometimes individuals will experiment with self-harm to see if it makes them feel less depressed, anxious or stressed.

### **How to respond to self-harm and what to do**

If a young person discloses to you that they are self-harming;

- Do listen and stay calm. Try to make notes as soon as you can and try to record exactly the words used by the young person
- Don't give the impression of being angry or impatient and DO NOT threaten in any way.
- Don't simply tell them to stop or 'pull themselves together' – this will merely antagonise and achieve nothing.

- Do seek clarification using open questions to ensure that the young person is not at immediate risk;

§ Do you need any medical help now?

§ What did you do and when?

§ Does anyone else know or have you told anyone else about this?

§ How are you coping now?

§ Is there anything you do that helps you avoid self-harming again?

- Tell the young person who you will need to talk to about this (normally the DSL) and when you will talk to them. Don't promise total confidentiality but do promise only to discuss with those you absolutely have to.
- Ask the young person if they are OK to carry on with the normal School routine. If they do not feel up to this then direct them to a public area that is quiet and where they can be safe.
- If the young person was accompanied by other young persons or was observed self-harming by others, ensure that they are OK and reassure them. Include the names of any witnesses in both your verbal and written reports to the DSL.
- Inform the DSL immediately – or the boarding house master or mistress. If the DSL is not on site then inform a Deputy DSL.
- Write down and sign and date your best recollection of the conversation and give to the DSL on paper or by email as soon as you can.

### **Dealing with a self-harm case**

Response will depend on the nature and potential severity of the case. We may broadly define three

'types' of case:

1. Those presenting an immediate risk of serious harm of a potentially life-threatening nature. This type of case requires immediate referral to the emergency services.
2. Those who may not present an immediate risk of serious harm but whose mental state is such that they are unable to maintain self-control or engage with normal routine and who continue to pose a potential threat to themselves and the well-being of potential witnesses. This type of case will need referring and parents will normally be asked to look after their child at home.
3. Those who have self-harmed but are not at immediate risk and are able to remain calm and in control and consequently able to engage with normal School routine.

**The DSL will respond as follows:**

Type 1 cases

If there is a serious concern for the immediate safety of a self-harming student or seen to be any risk of suicide then emergency services should be contacted via 999. Parents will be informed after the emergency services have been called.

- In such a case priority should be given to making the young person safe and under constant observation until the emergency services arrive.
- After the young person has been taken into the care of the emergency services the DSL should inform the Access and Assessment Mental Health Team.
- Keep parents fully informed.

Type 2 cases

- If there is no immediate concern of serious harm, but there are serious concerns about mental wellbeing and state of mind, and, if after a period of time, the young person still seems to be unable to cope with or respond to normal routine (Type 2 above), then call the Access and Assessment Mental Health Team to inform and seek advice. Inform parents of the action.
- If the young person concerned does not seem to calm and continues to represent a threat of further self-harm – especially if this is something that could be witnessed by and adversely affect other students – then the parents of that young person will be asked to take them home. Parents would be advised to keep contact with the Access and Assessment Mental Health Team or the local Integrated Delivery Team, Mental Health or to contact their GP.

Type 3 cases

- If the young person has calmed and seems able to cope with normal routine (Type 3 above) then they should return to that routine.
- As a policy we will always inform parents of incidents of self-harm unless there is a concern that in doing so we may place the young person at risk.
- If the young person is open to receiving assistance and grants permission and if parents are supportive, we can then:
  - Contact the local Integrated Delivery Team, Mental Health for advice
  - Encourage young person and parents to contact their GP
  - Contact a counselor to make an initial appointment with the young person
- If the young person is not open to assistance and does not grant permission to contact others then we would encourage parents to contact their GP. We can also informally, and without naming names, seek advice from local Integrated Delivery Team, Mental Health.
- Any other young people who may have witnessed self-harming should be spoken to by the DSL to ensure that they are OK and to reassure them.

Parents of such students should be informed but the School should not refer by name to any other students.

**Eating Disorders and responding to eating disorders**

What is an eating disorder?

There are a wide range of conditions and issues that fall within the broad definition of eating disorder. They can have physical, psychological and social consequences.

- The most extreme form can be Anorexia Nervosa – deliberate starving sometimes combined with excessive exercise.
- Bulimia – when a person seeks to control weight or mood by binge eating and making themselves deliberately sick. This condition may also be combined with the excessive use of laxatives

- Binge-eating – a compulsion to regularly eat excessive amounts
- EDNOS – ‘eating disorder not otherwise specified’ is a diagnosis of some type of eating disorder that does not entirely conform to the three conditions set out above.
- At a lower level we may observe occasional binge eating – often as a form of comfort – or irregular or odd eating patterns. We may be generally concerned that a student seems to be either under weight or over weight as a result of eating patterns.

How do you recognise it?

- Mostly this is through observation of weight or eating habits
- Evidence of someone deliberately making themselves sick or if they seem to possess an unusual supply of laxatives.
- Often the friends or family of the young person may raise a concern.

Why do young people have eating disorders?

- The cause may be related to a trauma of some kind – physical or psychological
- It can be an indication of depression, anxiety or stress
- It can result from social pressures and family problems such as separation or divorce.
- It can be a reaction to bullying or exclusion
- It can indicate low self-esteem or lack of confidence.

### **How to respond to a suspected eating disorder and what to do**

- If you observe something that causes you to be concerned then inform the DSL. Inform verbally but do also put your concerns and reasons in writing or an email, signed and dated, as soon as you can.
- If a student comes to you and discloses an eating disorder, or discloses a concern about another student, then please follow this guide:

§ Stay calm and reassure

§ Ask open questions for clarification if necessary

§ Do not promise total confidentiality but do promise to tell only those who absolutely need to know.

§ Tell the student who you will be informing, why and when.

§ Ensure that the student is OK and if necessary keep the student under observation in a safe but public place.

§ Speak to the DSL as soon as you can.

### **Dealing with an Eating Disorder**

- The DSL should treat all such concerns seriously – if it is Anorexia or Bulimia, they are serious illnesses that require professional medical response.
- Parents must be informed and advised of the need to seek a GP consultation.
- Further advice can be obtained by contacting the Access and Assessment Mental Health Team or the Integrated Delivery Team, Mental Health
- Any students who brought this concern to the attention of staff or who were witnesses to any of the symptoms should be spoken to and reassured by the DSL, head or assistant head.

### **Mental Health and well being**

The guidance supplied in ‘Mental Health and behaviour, advice for Schools’ (DFE March 2016) is very valuable.

The advice stresses the following key points.

- The need for the provision of information and advice to key staff – DSLs and SENCO in particular
- The importance of promoting resilience and self-confidence and self-esteem through our ethos, behaviour policies, curriculum and PSHE and staff training and awareness.
- The importance of working closely with parents and outside agencies when a pupils is suffering from anxiety and mental health issues.
- The importance of using appropriate counseling services when possible.
- The need to be aware of local procedures, help lines and organisations within Suffolk.

The key contact within Suffolk is:

Access and Assessment Mental Health Team – local area integrated delivery team (formally CAMHS)

Advice and referral for concerns about child mental health issues and self-harming



## **APPENDIX 3: Peer to peer abuse CONCERN OF ABUSE BY ONE OR MORE PUPILS AGAINST ANOTHER**

### **The nature and signs of children abusing other children**

Other children may be responsible for abusing another child or children. This abuse may be Physical, Sexual, Emotional/Psychological and may occur in School, out of School and online via social media. It may take the form of:

- Bullying (including cyber bullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling.
- Sexual violence, such as rape, assault by penetration and sexual assault.
- Sexual harassment such as sexual comments, jokes and online sexual harassment, which may be stand alone or part of a broader pattern of abuse.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.
- Sexting (also known as youth produces sexual imagery)
- Initiation/hazing type violence and rituals.
- Abuse in intimate personal relationships between peers

A bullying incident should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm or seriously undermine a child's well being and mental state.

It is important to be aware of those children who may be particularly vulnerable to abuse by other children. Those especially vulnerable may include children:

- with learning difficulties
- with physical disabilities
- with emotional or behavioural difficulties
- displaying signs of anxiety or depression

Child on child abuse may occur singularly or it may occur in groups. The nature of the abuse may not be immediately evident and this will be especially true if the abuse is in the form of subtle social bullying and exclusion. Staff should also be aware that the victims of such abuse may be reluctant to report it out of fear of appearing to be a 'snitch' and therefore run the risk of further alienation and exclusion. It is important to keep in mind that the perpetrators will also need to be safeguarded in terms of dealing with behaviours and attitudes that are damaging to them as well as to their victims. It may be the case that action will be required in relation to a group of children as well as action aimed at individual children.

### **Action to be taken when there is a concern about child on child abuse.**

The safety and the well-being of the victim(s) is paramount and therefore the first priority is to ensure the safety of victims – physical safety or emotional well-being – and minimise the possibility of further abuse. The School anti bullying and behaviour policies will deal with the vast majority of issues arising between children in the School and in most cases the procedures outlined in those policies will suffice.

However, there may be cases where the serious nature of the abuse, or the persistent and prolonged nature of the abuse requires further intervention or the involvement of other agencies. Such cases may include:

- Serious assault
- Sexual assault
- Grooming' for sexual exploitation
- The supply of illegal substances
- Intimidation – physical, social or psychological – especially if accompanied by threats
- Prolonged bullying or exclusion – in School, out of School or online – designed to degrade or humiliate
- Peer pressure being used to encourage behaviour such as hazing that is dangerous or damaging to individuals or groups.

Cases requiring immediate referral to Children's Social Care Services Any concern that a child may be

in danger of serious harm from others or self-harm – physical or emotional – must be referred to Children's Social Care Services.

In cases involving concern relating to serious assault, sexual assault, grooming, supply of illegal substances or intimidation aimed at encouraging illegal or dangerous/damaging behaviour, then immediate referral should be made to Children's Social Care Services using the Customer First contact number given above.

The victims of such abuse must be made safe from further potential harm by placing them in the care of a member of the senior management team – normally the Head of Prep for children of prep School age, or the Head of Senior School for those of senior age.

Normally parents or guardians of both victims and perpetrators would be contacted immediately by telephone to be informed of the issues and the action taken. The only exception to this would be if there was a concern that any particular parent or guardian may be involved in any element of the abuse. Those who are suspected of being abusers in these cases may be removed from School or placed under directly supervised internal exclusion within the School. The best interests of victims or the instructions of external agencies will largely determine the precise action taken.

### **Cases requiring special action within School and possible intervention by Children's Social Care Services**

If the nature of the concern is serious but it is not felt that there is immediate danger to the physical or emotional well-being of the victim, then the School will initiate a more intensive series of interventions designed to safeguard victims, deal effectively with perpetrators and resolve conflict. Such concerns are most likely to be social bullying and exclusion. This is often a complex issue involving many students and it can often be the case that children are at various times both victims and perpetrators. The principles set out in the anti-bullying policy apply here but in addition there may be a need for:

- Closer and regular monitoring
- The involvement of parents
- Special staff briefings to ensure all staff are aware of the issues and what action is required
- The use of mentors and advisors for particular children or groups of children – both victims and perpetrators
- The use of monitored peer mentoring
- The use of professional counsellors – to assist with equipping children with strategies
- The application of internal exclusion, fixed term external exclusion and permanent exclusion

All actions taken and interventions must be recorded and dated. If serious issues persist and are not resolved, and it is felt that there is a serious threat to the well-being or health of any individual or group of individuals, then referral must be made to Children's Social Services.



## **APPENDIX 4: ADVICE AND INFORMATION RELATING TO CHILD SEXUAL EXPLOITATION, FEMALE GENITAL MUTILATION, PREVENTING RADICALISATION, 'honour based abuse' AND OTHER SPECIFIC CONCERNS**

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for Schools and colleges on the TES website and also on its own website [www.nspcc.org.uk](http://www.nspcc.org.uk)

We can also access broad government guidance on the issues listed below via the gov.uk website:

- child sexual exploitation (CSE) – see also below
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – see also below
- forced marriage (the legal age of marriage being 18)
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- so called 'honour crimes'
- mental health
- private fostering
- radicalisation
- sexting
- teenage relationship abuse
- trafficking
- Child criminal exploitation – including 'County Lines'
- Domestic abuse

Further information on Child Sexual Exploitation and Female Genital Mutilation Child sexual exploitation (CSE): involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines referred to previously. A list of risk factors can also be found in Appendix B of 'Multi Agency statutory guidance on female genital mutilation' April 2016. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

From October 2015 there is an additional mandatory requirement (Section 74 Serious Crimes Act,

2015) for Schools to report any concerns relating to possible FGM to the police (See KCSIE September 2021, Annex A). Any staff with evidence that suggests FGM has actually taken place should themselves contact the police (dial 101) in addition to informing the DSL.

As from April 2016 there is new statutory guidance 'Multi Agency statutory guidance on female genital mutilation.' Annex D and D2 – most especially D2.11 - of this guidance is of greatest relevance to Schools. The guidance reminds Schools of the statutory obligation to refer concerns, provides a broader list of 'risk factors', clarifies the reporting of those who have actually suffered FGM and those who are at risk from it, and emphasizes the need to ensure staff have appropriate awareness training and that students have awareness via appropriate PSHE.

#### **'Honour Based Abuse'**

This relates to physical or emotional abuse perpetrated by those who believe that the victim has in some way broken a cultural or religious 'code of honour'. Any abuse of this nature is a crime and considerations of religion or culture should never prevent action from being taken or referrals being made. Students considered at risk require especially vigilant monitoring. There is a specific Honour Violence Helpline on 0800 599 9247

#### **Preventing Radicalisation**

The School and staff have a 'duty of due regard' (sec 26 Counter Terrorism and Security Act, 2015) to take appropriate steps to prevent the radicalisation of students or their exposure to ideologies that might tend towards radicalisation, in support of terrorism, acts of terrorism or the joining of terrorist groups. The School policy will take due account of the additional guidance on Prevent issued by the Home Office in April 2016. This guidance clarifies the need to ensure that policy takes local procedures and cultural/demographic circumstances into consideration when providing guidance and training for staff.

The proprietors, together with the Head Teacher will ensure that staff have 'Prevent Awareness' to detect and respond to signs of radicalisation. The DSLs will have 'Prevent Awareness' training as part of their two yearly training sessions. All staff are made aware of the procedures followed within Nottinghamshire and the responsibilities of the Nottinghamshire Channel Panel. Channel is a voluntary support programmes. All staff must complete the 'Police College' online 'Radicalization Awareness training at [http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html)

Staff are required to inform the DSL of any concerns they may have in relation to possible radicalisation of children. The DSL will treat this as a potential child abuse and follow the procedures outlined in Appendix 6 below.

#### **Criminal Exploitation of children and 'county lines'**

Police are reporting an increase in exploitation of children by organised criminals using them as carriers for moving drugs, money and items. This is known as 'county lines' exploitation. Criminals groom children for these roles and do so using either threat or inducement. This activity can have a terrible impact on children, put them in danger, expose them to drugs and other forms of exploitation and seriously interfere with their educational and personal development.

Signs of such exploitation may well be similar to the signs for CSE but will also likely include long absences or regular unexplained absence from School and a reluctance to be honest about the reasons for such absences. Any concerns of this nature should be reported to children's social services and the police. There is a useful Home Office guide, 'Criminal exploitation of Children and County Lines', July 2017.

[The right to choose: government guidance on forced marriage \(the legal age of marriage being 18\) \(the legal age of marriage being 18\) - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/guidance/the-right-to-choose-government-guidance-on-forced-marriage)

## **Appendix 5 Seven Golden Rules to Sharing Information**

1. Remember that the General Data Protection Regulation (GDPR). Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice for other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the person where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being, base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, it shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely. (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Taken from [information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (2018) HM Government

## Appendix 6 Role of the Designated Safeguarding Lead (DSL) and deputies

The Board of Directors should appoint an appropriate member of staff, from the company **leadership team**, to take the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection. This person should have the appropriate status and authority within the company to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and to support other staff to do so – and to contribute to the assessment of children.

### Deputy designated safeguarding leads

Any deputies should be trained to the same standard as the designated safeguarding lead.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately training deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated.

Deputy designated safeguarding leads

Jake Cosford

Philip Varley

Johanne Varley

### Manage referrals

The designated safeguarding lead is expected to:

- Refer cases of suspected abuse to the local authority Children's Social Care as required.
- Support staff who make referrals to local authority children's social care.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Support staff who make a referral to the Channel programme.
- Refer cases where a person is dismissed or left due to risk/ harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

### Work with others

- Act as point of contact with the three deputy safeguarding partners.
- Liaise with the Headteacher to inform them of issues especially on-going enquiries under section 47 of the Children Act 1989 and police investigations.
- As required, liaise with the case manager and designated officers at the local authority (also known as local authority designated officer/LADO) for child protection concerns (all cases which concern a staff member); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice, and expertise for staff.

### Undertake training

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at every two years.

The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.

- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff.
- Be alert to the specific needs of children in need, those with special educational needs or a disability and young carers.
- Understand the importance of information sharing, with the DSL and Deputies, other agencies, organisations, and practitioners.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School or college may put in place to protect them.

### **Raising awareness**

- The designated safeguarding lead should ensure the Progression 2Work policies are known, understood, and used appropriately.
- Ensure the child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- Ensure the child protection is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this.

### **Availability**

During term time the Designated Safeguarding Lead (or Deputies) will be available for contact (during School hours) for staff in the School to discuss any safeguarding concerns. Should the DSL or Deputies be unavailable – contact the Head Teacher/School Manager or other SLT to share concerns. If an urgent concern call 101 or Nottingham social care on 01158 764800

For Progression contact out of hours can be made by calling DSL and Deputies via mobile phones.

## Appendix 7

### Children's Social Care Child Referral Form

This referral form should be used to support a telephone referral to Social Care and should be submitted within 48 hours of the call. It can also be used to make non-urgent referrals.

#### Section 1: Details of the child/family you wish to refer

Referral date:

#### Details of all children or young people living at the household

First Name	Surname	DOB/EDD	Gender	Ethnicity	Disability	Who has PR*

\*Parental Responsibility

#### Family and other household members

First Name	Surname	DOB	Gender	Ethnicity	Disability

#### Household address

Postcode:	Telephone:

#### Section 2: The referrers contact details

Name	Job title/Role	Agency address
Phone number	Email	

- Have you spoken with someone in Children's Social Care already? Yes  No
- Are you likely to have on-going contact with this family? Yes  No



**Section 3: Reason for referral**

- Have you spoken with someone in Social Care already? Yes  Date: \_\_\_\_\_ No
- Have you completed an Early Help Assessment? Yes  No

If 'Yes', complete sections 3, 6 and 7 only and attach a copy of the EHA and TAF documents to this referral form.

If 'No', why have you been unable to complete the EHA?

**Reason for referral.** Please give:

- A summary of the key issues concerns and risks
- Your view on the level of urgency
- What, if anything, has been done in relation to this already
- Details of what you are asking for from Children's Social Care.

Please attach all relevant assessments or reports.

**Threshold scaling**

Using the information, you have provided please tick the safety and well-being scale below to indicate what level of need you consider this referral suggests.

- Low level need**  
Where need is relatively low and where individual services and universal services may be able to address the child's needs without the involvement of other services.
- Emerging need**  
Where a range of early help services may be required. Co-ordinated through an Early Help Assessment where there are concerns for a child's well-being are not clear, not known or not being met.
- Complex or serious needs**  
Where without the intervention the child would become at risk of significant harm or the needs are such that without intervention the child's health or development would be seriously impaired. Help is provided as a child in need under Section 17 of the Children Act (1989) via a specialist in-depth assessment and following this at least initial co-ordination of services via the Social Worker.
- Child protection concerns**  
Where there is reasonable cause to suspect a child is suffering or likely to suffer significant harm because of abuse or neglect. Under Section 47 of the Children Act 1989, local authority Children's Social Care must make enquiries and decide if any action must be taken to protect the child.

**Information sharing**

- Have you discussed this referral with the child/young person? Yes   
No
- Have you discussed the referral with the person with PR? Yes   
No
- Has the child/young person/person with PR given their consent for other agencies to be contacted? Yes   
No

If any agencies have been excluded from this, please state which:

- Are you aware of any risks to staff from any member of the household? Yes  No
- If 'Yes' please give details:

**Anonymity**

There is an expectation that when making a referral, professionals inform the family of the referral and identify themselves as part of the referral process. Information regarding the identity of the referrer will normally be shared with the family. If you consider that identifying you as the referrer will place you at level of risk, please explain below. A Social Worker will discuss this with you.

- Do you need to remain anonymous? Yes   
No

If 'Yes', please explain why?

**Section 4: Other family or household members or significant others**

e.g. parents, stepparents, grandparents, half siblings, step siblings or adult siblings.

First name	Surname	DOB	Gender	Ethnicity	Disability	Relationship to child

**Address if different**

Name	Address and postcode

**Section 5: Other professionals/agencies involved**

Child/young person	Nursery/School/college	GP/Medical Centre

- Are other professionals or agencies involved other than the above? Yes  No

If 'Yes', the name and address/work base of the other professional/agency

Name	Address/work base

## Appendix 8 – Induction Training Check List

Progression2Work: Induction Training Requirements

Before commencing regulated activity at Progression 2work staff will need to complete the following Training in Safeguarding (if not already held).

Joh Varley will retain a copy of your certificate as soon as course is completed. It will be placed in the individuals HR file in the CPD section and within the Safeguarding Qualification Matrix.

Staff may be required to complete other training during Induction or at times during their contract because of changing need, gaps in knowledge, statutory renewal, or individual request for career development.

Some training is only required for Senior Leaders.

Title
Safeguarding Advanced (Level 2)
DSL Training (Level 3)
Child Sexual Exploitation
Child Criminal Exploitation
Fire Warden (dedicated staff members)
GDPR/Data Protection
Internet Safety Children
Keeping Children Safe On-line
Prevent Parts 1 and 2
Channel
First Aid in the Workplace On-line
L3 First Aid Practical
Safer Recruitment L3
FGM
Diffusion and De Escalation
Equality & Diversity
Serious Violence and Knife Crime
Sexual Violence, Abuse and Harassment between peers
County Lines
Pathological Demand Avoidance

### **\*\*Victims and alleged perpetrator(s)**

For the purposes of this guidance, we, in places, use the term ‘victim’. It is a widely recognised and understood term. It is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

For the purpose of this advice, we, in places, use the term ‘alleged perpetrator(s)’ and where appropriate ‘perpetrator(s)’. These are widely used and recognised terms and the most appropriate to aid effective drafting of guidance. However, schools and colleges should think very carefully about terminology, especially when speaking in front of

children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. As above, the use of appropriate terminology will be for schools and colleges to determine, as appropriate, on a case-by-case basis.