

SAFEGUARDING & CHILD PROTECTION POLICY

1. PURPOSE

At OSGUK Northwich Campus (hereafter ‘the Campus’), we will provide a safe and welcoming environment where every child and young person is respected and valued. It is the responsibility of everyone to be alert to the signs of abuse and harm in all its forms and to follow the procedures to ensure that children receive timely and effective support, protection and justice.

This Policy sets out the Campus’ commitment to safeguarding, promoting the welfare of children and Keeping Children Safe in Education in line with the 2018 Statutory Framework.

The purpose of this policy is to provide a framework setting out how we safeguard and promote students’ welfare in accordance with our moral duty and statutory guidance. The policy also informs parents and carers about how we will safeguard their children while they are in our care.

2. SCOPE

This policy and the associated statutory procedures apply to all staff, Trustees, volunteers, visitors and parents of both current and prospective students in the Campus.

The policy and procedures are consistent with the locally agreed inter-agency procedure for Local Safeguarding Children Board.

The policy is available on the school website and is made available to all staff, Trustees, volunteers, parents, both current and prospective, and visitors to the school.

3. DEFINITIONS

For the purposes of this Policy, the following definitions apply.

CCTV	Close circuit television
Child	Anyone who has not yet reached their 18th birthday. For the purpose of the policy this means all students in the Campus and also extends to visiting students from another OSGUK Campus.
Child Protection	Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Child Abuse	A form 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. Children may be abused by an adult or adults, or another child or children.
Child in Need	A child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.
CPOMS	Child Protection On-line Management System
DfE	Department of Education
DBS	Disclosure and Barring Service
LADO	Local Authority Designated Officer – officers from the local authority designated as being the primary point of liaison in the event of allegations of abuse being made against the Head Teacher, principal, proprietor or member of governing body.
Looked After Child	A child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the local authority.
DSL	Designated Safeguarding Lead – member of staff in school who leads on Safeguarding and Child Protection – both staff training and management of referrals. The DSL must be a Senior Leader.
DDSL	Deputy Designated Safeguarding Lead
FGM	Female Genital Mutilation
GDPR	General Data Protection Regulations
IT	Information Technology
KCSIE	Keeping Children Safe in Education
LA	Local Authority
LSCB	Local Safeguarding Children Board
MASH	Multiagency Safeguarding Hub. Often the first point of referral from school for a Child Protection case.
NSPCC	National Society for the Protection of Cruelty to Children
OSGUK	OneSchool Global UK
Parent	Refers to birth parents and other adults in a parenting role

PEP	Personal Education Plan
PoP	Peer on Peer
Principle of Proportionality	The least intrusive response appropriate to the risk presented.
PSHEE	Personal, Social, Health and Economic Education
Safeguarding	The process of protecting children from maltreatment, preventing the impairment of children’s health or development, ensuring that 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. This includes all forms of maltreatment including Youth Produced Sexual Imagery, peer on peer abuse, cyber bullying and radicalisation.
SCR	Single Central Record
SEND	Special Education Needs and Disabilities
SIMS	School Information Management System
Social Care	Refers to Children’s Services in the area in which the child is resident
Staff	Refers to all those working for or on behalf of the Campus, full time or part time, temporary or permanent, in either a paid or a voluntary capacity.
TRA	Teaching Regulations Authority
UKCCIS	UK Council for Child Internet Safety

CONTACT DETAILS

SCHOOL CONTACT INFORMATION		
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Acting Designated Safeguarding Lead:		
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Head Teacher (where the concern is about a member of staff):		
Paul Foxtan	0161 975 9323	Paul.foxtan@focus-school.com
Regional Trust Lead (where the concern is about the Head Teacher):		
Terry Mitchell	07848 452463	Terry.Mitchell@uk.oneschoolglobal.com
Safeguarding Trustee:		
Lewis Baldwin	07848 459505 0151 352 1107	Lewis.baldwin@focus-school.com or lewis.baldwin@rltgroup.co.uk
HR Trustee:		
Melvyn Dunbar	07585965848	Melvyn.dunbar@focus-school.com
National Safeguarding Coordinator:		
Ted Picton	0330 055 5600	ted.picton@focus-school.com
EXTERNAL CONTACT INFORMATION		
Campus Local Safeguarding Children's Board (LSCB)		
Julia Storey	0161 474 5958	julia.storey@stockport.gov.uk
Multi-Agency Safeguarding Hub (MASH) for initial enquiries about children and young people		
Sally Roy	0161 474 4734	sally.roy@stockport.gov.uk
Local Authority Designated Officer (LADO) for allegations against individuals who work with children		
Gill Moore	0161 474 5657	gill.moore@stockport.gov.uk
FGM The Diversity Crime Unit	101 / 0161 856 9829	heatonsandreddish@gmp.police.co.uk
LA Prevent Lead	0800 789 321	channel.project@gmp.police.uk
Police (non-emergency)	101 / 0161 856 9829	heatonsandreddish@gmp.police.co.uk
Ofsted Safeguarding Children	08456 404046	whistleblowing@ofsted.gov.uk
DfE Dedicated telephone helpline and mailbox for non-emergency advice for Staff & Trustees	020 7340 7264	counter.extremism@education.gov.uk
NSPCC Whistleblowing Helpline	0800 028 0285	help@nspcc.org.uk
CEOP National Crime Agency	0370 496 7622	communication@nca.x.gsi.gov.uk

Introduction	Page 6
Policy Principles	Page 6
Policy Aims	Page 7
Types of Abuse	Page 7
Recognising signs of abuse	Page 8
Roles & Responsibilities	Page 10
Induction	Page 14
Responding to Safeguarding Issues	Page 15
Concerns about a child	Page 16
Flow chart for raising safeguarding concerns	Page 17
Reporting Safeguarding Issues	Page 17
Information and Data Sharing	Page 18
Flow chart to guide information sharing	Page 19
Making a referral	Page 20
Allegations of abuse made against staff	Page 21
Low level concerns about adults in school	Page 21
Dealing with the media	Page 22
Whistleblowing	Page 22
Social media	Page 23
Complaints	Page 23
Early Help, child in need, child at risk of significant harm	Page 23
Extremism and radicalisation (the Prevent Duty)	Page 24
Children absconding or going missing from an educational setting	Page 24
Peer on peer abuse	Page 25
Learning support – SEN and disabilities	Page 26
Helping children to keep themselves safe including online	Page 26
ICT & e-safety policy	Page 27
E-safety reporting button	Page 27
Child criminal exploitation (county lines)	Page 27
Child sexual exploitation (CSE)	Page 27
Children with sexually harmful behaviour	Page 27
Domestic abuse	Page 27
Female genital mutilation (FGM)	Page 28
Forced marriage	Page 28
Homelessness	Page 28
Honour-based violence	Page 29
Youth produced sexual imagery (sexting)	Page 29
Personal education plan and looked after children	Page 30
Support in Campus	Page 30
Physical contact with students	Page 30
Record keeping	Page 30
Transferring files	Page 31

Parent access to educational records	Page 31
Partnerships with parents	Page 31
Private fostering	Page 32
Safeguarding students on work experience	Page 32
One-to-one teaching, extended school and off-site arrangements	Page 32
Video conferencing and off-site arrangements	Page 33
Images and photography	Page 33
Visitors to the Campus	Page 33
Site security	Page 34

4. POLICY STATEMENT

4.1 INTRODUCTION

- 4.1.1 This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with statutory guidance: 'Working Together to Safeguard Children' 2018, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if you are worried a child is being abused' 2015, Prevent Duty Guidance 2015.
- 4.1.2 The policy also reflects, both statutory guidance KCSIE 2018 and LSCB Procedures.
- 4.1.3 The Board of Trustees takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our Campus to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

4.2 POLICY PRINCIPLES

- 4.2.1 The welfare and needs of the child are paramount.
- 4.2.2 At the Campus we maintain an attitude of 'It could happen here'.
- 4.2.3 Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- 4.2.4 All children have a right to be protected from harm and abuse.
- 4.2.5 Our organisational culture will be one of **highly consistent and collective vigilance** for the safety and wellbeing of the children in our care, for every child every day.
- 4.2.6 All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the Campus or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- 4.2.7 We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- 4.2.8 Whilst the Campus will work openly with parents as far as possible, it reserves the right to contact Social Care or the Police, without notifying parents, if this is believed to be in the child's best interests and/or the child is at risk of significant harm.

- 4.2.9 It is the responsibility of all stakeholders that staff, students and volunteers feel supported and able to report and refer any concerns to the Local Authority that they may have regarding the welfare of those around them.

4.3 POLICY AIMS

As part of our Safeguarding Policy the Campus will:

- 4.3.1 Demonstrate the Campus' commitment with regard to safeguarding and child protection to students, parents and other external partners.
- 4.3.2 Promote and prioritise the safety and wellbeing of children and young people.
- 4.3.3 Provide a safe environment for all children especially those who are considered vulnerable.
- 4.3.4 Ensure robust safeguarding arrangements and procedures are in operation.
- 4.3.5 Enable the Campus to effectively contribute to Early Help assessments of need and provide support for those children.
- 4.3.6 Ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate training to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people.
- 4.3.7 Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern.
- 4.3.8 Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.
- 4.3.9 Prevent the employment/deployment of unsuitable individuals.

4.4 TYPES OF ABUSE

- 4.4.1 Abuse may fall into the categories of physical, emotional (including regular exposure to domestic violence), sexual and neglect. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They must seek to understand the background and context to make good safeguarding decisions.
- 4.4.2 Child abuse is a term used to describe ways in which children are harmed by someone, often in a position of power. It is not the responsibility of Campus staff to decide whether child abuse is occurring, but we are required to act on any concerns, including nagging doubts and report it to the appropriate party. The health, well-being and protection of a child are paramount.
- 4.4.3 Abuse is often categorized into four broad categories:

Physical

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

Emotional (including regular exposure to domestic violence)

- the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a

child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the 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 a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from 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, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual

- involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the 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 sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education

Neglect

- the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

4.5 RECOGNISING SIGNS OF ABUSE

- 4.5.1 Possible signs of abuse include the following (but are not limited to these and these signs do not necessarily mean that abuse is occurring):
- the student says that they have been abused or asks a question which gives rise to that inference

- there is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries
- the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour. For example, they may become aggressive, challenging, disruptive or withdrawn
- the student does not want to change clothes in front of others or participate in physical activities
- the student is having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- the student talks about being left home alone, with carers that appear to be inappropriate or with strangers
- the student is regularly missing from school or education
- the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- the student's development is delayed in terms of emotional progress
- the student suddenly loses or gains weight
- the student drinks alcohol regularly from an early age
- the student is concerned for younger siblings without explaining why
- the student talks about running away
- the student shies away from being touched or flinches at sudden movements
- the student demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes
- the student appears neglected, e.g. dirty, hungry or inadequately clothed
- the student is reluctant to go home or has been openly rejected by his parents or carers.

4.5.2 Signs of grooming:

4.5.3 The signs of grooming are not always obvious. Groomers will go to great lengths not to be identified. Some actions associated with those grooming children in schools may include:

- meeting students secretly, or without seeking authorisation from the Head Teacher
- collusive behaviours designed to cultivate dependency, such as
 - unprofessional conversations about other members of staff
 - breaking School Rules over providing students with alcohol and
 - 'friending' pupils on social media platforms, contrary to school policy

4.5.4 Students who are being groomed at school or elsewhere may:

- be very secretive, including about what they are doing online
- have unexplained absences
- have older pupil friends or girlfriends
- go to unusual places to meet friends
- have new belongings such as clothes or mobile phones that they can't or won't explain
- have access to drugs and alcohol

- 4.5.5 In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age may be observed.
- 4.5.6 You may find it useful to refer to the Department for Education's guidance What to do if you're worried a child is being abused (March 2015).
- 4.5.7 Further information is available in Appendix 1 (Further Information on Signs of Abuse)

4.6 ROLES & RESPONSIBILITIES

4.6.1 The Board of Trustees will:

- Provide guidance in line with their responsibility as the proprietor to ensure policy, practice and training is in place in line with KCSIE 2018 - Part 2 - The Management of Safeguarding. The Board of Trustees will appoint a Safeguarding Trustee to oversee this.
- Safeguard and promote the welfare of children to protect them from maltreatment, to prevent impairment of children's health or development ensuring that children grow in circumstances consistent with the provision of safe and effective care and taking action to enable children to have the best outcomes. This is a strategic role and Trustees would not ordinarily be involved in the day to day response to operational safeguarding matters except where the Trustee is a member of the Campus Safeguarding Committee.
- Ensure that there is a mechanism in place to assist all staff, including Trustees and volunteers understand and discharge their role and responsibilities to safeguarding in line with the KCSIE (Part 1) 2018.
- Delegate to the Chair of the Board the responsibility to ensure that all Trustees, the Head Teacher(s), members of the Senior Leadership Team and middle leaders will be subject to s128 management checks. In addition, the Chair of the Board is responsible to ensure that safeguarding is a standing agenda item at all Trustee meetings and the School Improvement Plan (SIP) includes a section on safeguarding.

4.6.2 Board of Trustees will:

- Appoint a Safeguarding Trustee to:
 - take a lead in monitoring that the statutory requirements and procedures set out in this policy are adhered to.
 - Be responsible for undertaking annual reviews on behalf of the whole Board of Trustees and evaluation at the Campus of the Safeguarding & Child Protection Policy and procedures in conjunction with the Designated Safeguarding Lead. Provide an annual report to the Board of Trustees on the safeguarding provision
 - Meet regularly (at least termly) with the DSL/Deputy to discuss updates, reviews and evaluation of the Safeguarding and child protection policies and procedures.
 - Be trained in child protection and inter-agency working. This training will be updated every two years or in line with the LSCB requirements.
- Ensure that a comprehensive annual safeguarding audit is undertaken and that all action points are recorded on the School Improvement Plan and remedied. Ensure

that the safeguarding performance reports are completed as required, their outcomes discussed, and any learning actioned on the School Improvement Plan.

- Ensure that safeguarding arrangements take into account policies and procedures of the LSCB.
- Have procedures in place to handle allegations against other children (peer on peer); youth produced sexual imagery and how to handle allegations about staff members, including allegations against the Head Teacher and Trustees, volunteers or visitors to the school.
- Ensure the Campus's Safeguarding and Child Protection Policy is available publicly and on the Campus website.
- Ensure that the DSL and DDSL have time, funding, training, support and resources to undertake their role and to support other staff within the Campus.
- Ensure that appropriate child protection training is in place (current and up-to-date) for the DSL and DDSL to a standard set by the LSCB and is recorded on the Training Log. If appropriate, ensure that the DSL receives training to promote the educational achievement of children who are looked after.
- Ensure that new staff members taking on a DSL role are appropriately trained by the LSCB.
- Ensure that appropriate child protection training is in place as part of the induction for all staff including temporary and voluntary staff and that it is updated annually or in line with the LSCB requirements and that there is no lapse in training dates. Safeguarding training must always include an element of face to face, interactive training.
- Liaise with the LA on child protection allegations against staff, including the Head Teacher or DSL

4.6.3 HR Trustee will:

- Ensure that the statutory responsibilities for recruitment are followed, preventing people who pose a risk of harm from working with children.
- Ensure that the Safer Recruitment Policy is kept up to date and properly implemented
- Ensure safer recruitment procedures are followed, including pre-employment checks and vetting of new staff and volunteers working with children and records kept in line with KCSIE 2018 and the supplementary guidance on disqualification requirements.
- Ensure that at least one person on a recruitment panel has undertaken safe recruitment training within the last two years.
- Ensure that all appropriate child protection checks and procedures are applied to staff employed by another organisation such as agency staff working with the Campus's students, and that they are carried out.
- Ensure that no barred person is allowed to work in any regulated activity.
- Have procedures to fulfil the legal duty to make a referral to the DBS, TRA and, if appropriate, the charity commission in the event of dismissal of staff on safeguarding grounds.

4.6.4 Designated Safeguarding Lead

4.6.5 The role for the DSL is set out in detail in Annex B of KCSIE 2018 and is an appendix to job description of the individual concerned. This can be seen in Appendix 6 of this policy. In summary this includes responsibilities to:

- take lead responsibility for safeguarding and child protection (including online safety)
- Manage referrals to other services
- Work with others both within the Campus and external services
- Undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.
- Raise awareness of child protection procedures within the Campus
- Ensure that when a child leaves a Campus and they have a Child Protection File that it is transferred to the new school, separately from the main student file, ensuring secure transit and confirmation of receipt.
- Ensure that either the DSL or DDSL are available at all times during school hours

4.6.6 In addition to the Job Description the DSL will:

- Be a senior member of the Campus staff on the leadership team. The Head Teacher should not be the lead DSL but may perform a deputy role.
- Be trained in institutional grooming and E-Safety; ensure knowledge and skills are kept up-to-date.
- Organise training on child protection, E-Safety and Prevent within Campus for all staff, volunteers and Trustees ensuring that it is current and up-to-date and is recorded on the Training Log
- Ensure that all staff retain clear and well-organised written records of all concerns, discussions and decisions and the reason for those decisions using CPOMS.
- Oversee recording and reporting accordingly and monitoring regularly using CPOMS.
- Review records regularly so that concerning patterns of behaviour can be identified.
- Ensure the safeguarding local arrangements form is up to date and displayed in Reception and all staff working areas in school.
- Ensure the Safeguarding display poster is up to date and displayed in reception and key student areas in school.
- Complete the LSCB Annual Audit for Child Protection / Safeguarding.
- Have appropriate knowledge and training to protect and promote the welfare of a looked after child; holding details of looked after children and their contact information.

4.6.7 Deputy Designated Safeguarding Lead will:

- Be a member of the Campus staff (Teaching or Support staff). This may also be the Head Teacher.
- Have DDSL role defined as an appendix to their main job description.
- Act in the absence of the DSL fulfilling their duties and responsibilities.
- Be trained as a DSL by a LA and be registered for safeguarding and child protection updates in each student locality.

4.6.8 The Head Teacher will:

- Ensure that the Safeguarding Policy and its procedures are implemented and followed by all staff
- Undertake the LSCB DSL Training
- Ensure that safeguarding, including helping to protect students from a range of risks, including e-safety, is fully explored in teaching and learning opportunities within the curriculum
- Ensure that students are able to identify a trusted adult to listen to their concerns
- Ensure that there is a Safeguarding Notice Board in the Staff Room demonstrating how the Campus keeps children safe, to include e-safety. It will include how to report a concern, training dates, policies, posters, roles and responsibilities of safeguarding personnel, safeguarding up-dates, KCSIE 2018 and other publications and communications with regard to safeguarding
- Ensure Safeguarding Notices are displayed around the school; at reception and in all communal areas.
- Meet with the DSL to be kept informed of on-going investigations.
- Be the appointed member of staff to promote the achievement of looked after children.
- Be alert to children who go missing and put in place the appropriate safeguarding response.

4.6.9 Campus staff will:

- Know who holds the DSL and Deputy roles within the Campus.
- Receive annual training and regular updates in safeguarding and child protection, (e.g. minuted staff meetings, e-bulletins etc.). Prevent awareness training and on-line safety will be part of this. Training also applies to the Head Teacher if he/she is not a Deputy DSL.
- Be issued with a copy of the KCSIE (Part 1 – is the minimum for Volunteers) at the start of the Autumn Term or upon their appointment. This will form part of the training for Safeguarding and Child Protection.
- School Leaders and those who work directly with children will also receive Annex A of KCSIE 2018
- Undertake the KCSIE Quiz, which will be signed, dated and recorded along with a statement that they have read and understood the KCSIE 2018 guidance.
- Adhere to the Staff Code of Conduct.
- Be mindful that the Teacher Standards 2012 state that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (teaching staff including Head Teachers)

4.6.10 Campus Safeguarding Committee will:

- ensure that the school complies with its safeguarding obligations set out in relevant legislation, regulations and guidance and any rules issued by OSG UK;
- review safeguarding practice, in order to ensure the schools' fulfilment of its safeguarding obligations;

- work in partnership to ensure that the CSC is properly informed by appropriate information sharing and enabled to act effectively in addition to the specific roles of the DSL and DDSL;
- develop a holistic view of the safeguarding arrangements in place for individual students;
- identify and reflect on issues and patterns of concerns which may require a revision of safeguarding practice;

4.6.11 National Safeguarding Coordinator will:

- Provide guidance to all Campuses on policy and procedures related to Safeguarding.
- Provide advice and guidance to Head Teachers and Safeguarding Trustees in the implementation of the Safeguarding Policy, procedures and for training of staff, parents, volunteers and students.

4.6.12 National Safeguarding Committee will:

- Ensure that Safeguarding has the appropriate importance and organisational priority.
- Ensure that OSGUK and all Campuses comply with their safeguarding obligations as set out in relevant legislation, regulations and guidance and any rules issued by OSGUK.
- Review national trends in safeguarding and child protection, in order to advise on improvements to policy and procedure for all Campuses; make recommendations on safeguarding strategy, policies and practice, including lessons learnt from ineffective practice, in order to ensure that OSGUK and Campus' fulfilment with their safeguarding obligations.
- To identify and assess the safeguarding risks faced by OSGUK and Campuses and to recommend measures to mitigate those risks including the maintenance of a safeguarding risk register.
- To hold line management (Regional Principals, Head Teachers and DSLs) to account on implementation of safeguarding policies in schools.
- To identify and reflect on issues and patterns of concerns which may require a revision of safeguarding policies or practice.

4.6.13 Regional Principal will:

- regularly audit safeguarding procedures at the Campus and make recommendations, where necessary, for improvement or sharing of good practice and to report on its effectiveness to the Board of Trustees.
- be aware of Safeguarding referrals having been made, including allegations against staff members. Specific details of referrals relating to children do not need to be shared.
- provide professional support in the event of disciplinary procedures against students or adults at the Campus.
- Not be expected, unless acting as Head Teacher, to advise on specific referrals to the LADO, Children's Social Care or Police as this would delay the process and conflict with this policy.

4.7 INDUCTION

4.7.1 The detail of the induction for new staff is set out in the Induction Policy. However, from a safeguarding perspective this will include new staff being given copies of:

- Safeguarding & Child Protection Policy (including role of the DSL and CME guidance)

- ICT & E-Safety Policy
 - KCSIE part one (all staff)
 - KCSIE Annex A (leaders and those who work directly with children)
 - Behaviour Management Policy
 - Staff Code of Conduct (including whistleblowing, acceptable use of IT, staff/student relationships and guidance on social media usage)
- 4.5.2 New staff will receive Safeguarding training including online courses via Flick Learning and will be required to complete a quiz on KCSIE part one and the Safeguarding & Child Protection Policy

5. PROCEDURES

The following procedures apply to all staff working in the Campus and will be covered by training to enable staff to understand their roles and responsibility. The aim of these procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

5.1 RESPONDING TO SAFEGUARDING ISSUES

5.1.1 Stay calm, spend time with the child and use your skill in communicating with children to understand what has gone on. Some key things to consider:

- observe any injuries but should not ask a child to remove or adjust their clothing to observe them
- allow the child to lead the discussion. Do take it seriously even if you find it shocking or unlikely
- ask open questions. You need to ask enough information to know that it is a disclosure that needs to be addressed and the immediacy of any danger or significance of harm to the individual. It is not your role to get a detailed account and the individual may have to tell their story several more times.
- accept what the student says without challenge — reassure them that they are doing the right thing and that you recognise how hard it is for them
- do not lay blame or criticise either the child or the perpetrator
- do not make promises on about what will happen next nor that information provided will not be shared — reassure and explain that they have done the right thing and who needs to be told

5.1.2 Is the disclosure from an individual alleging abuse to themselves or another? Is this the reporting of a concern or suspicion? Does it involve another child, a teacher/volunteer or friends/family away from school?

- 5.1.3 Is the response what you would expect? I.e. has medical attention been sought promptly? Are parents being protective?
- 5.1.4 Is it something that needs addressing right now? Is it something that requires some planning before the end of the school day?

5.2 CONCERNS ABOUT A CHILD

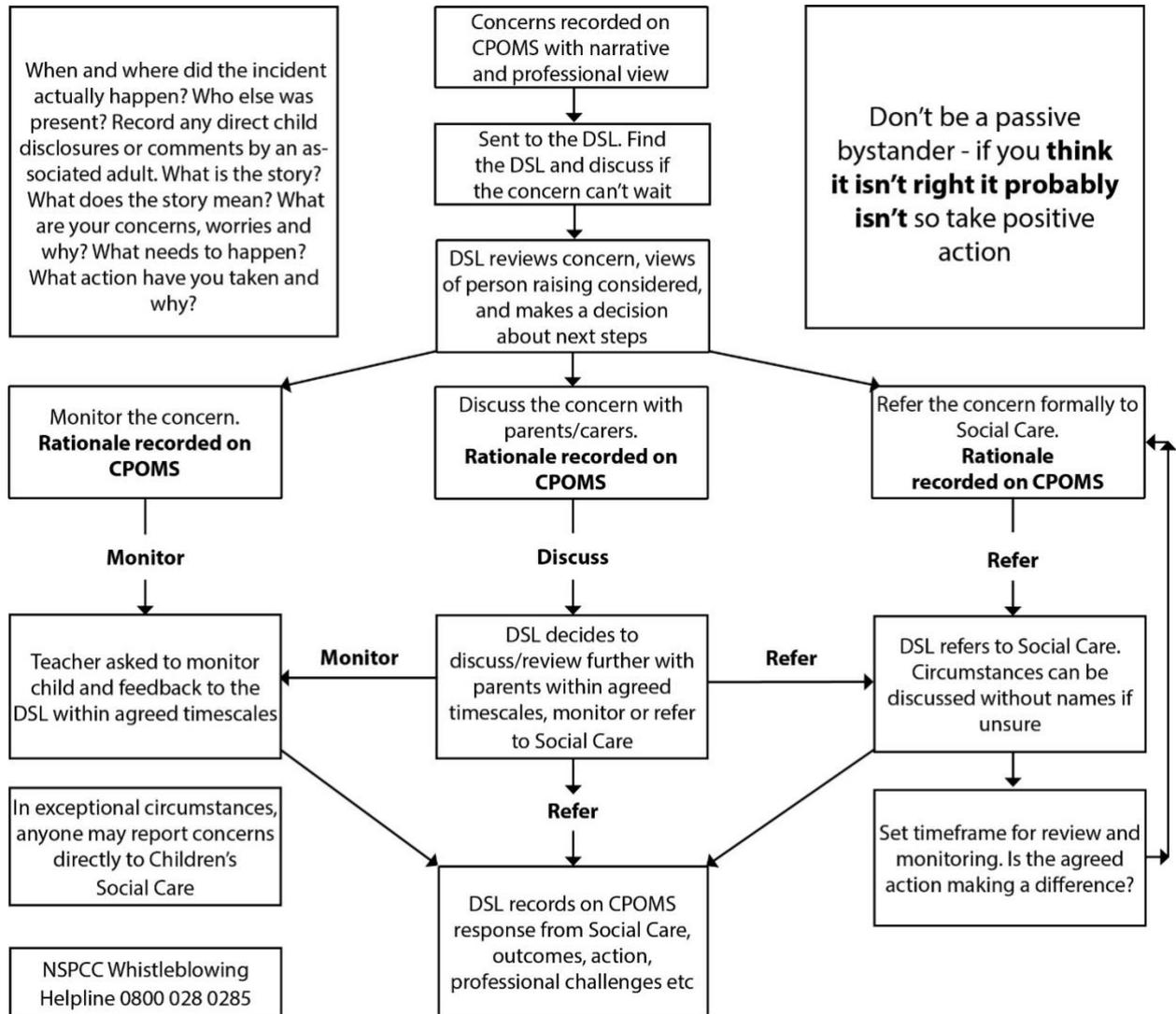
If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

- 5.1.1 Make an initial record of the information related to the concern.
- 5.1.2 Report it to the DSL immediately.
- 5.1.3 The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
- 5.1.4 Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
- Dates and times of their observations
 - Dates and times of any discussions in which they were involved.
 - Any injuries
 - Explanations given by the child / adult
 - Rationale for decision making and action taken
 - Any actual words or phrases used by the child
 - The records must be signed and dated by the author (or equivalent on CPOMS).
 - In the absence of the DSL or a DDSL, staff must be prepared to refer directly to MASH (and the police if appropriate) if there is the potential for immediate significant harm.

NB: A referral regarding significant harm must be made immediately or at least within 24 hours. It is the responsibility of all stakeholders that staff, students and volunteers feel supported and able to report and refer any concerns to the Local Authority that they may have regarding the welfare of those around them.

- 5.3. The initial sharing of information may lead to:
- a decision not to take any further action
 - a strategy discussion at school; which may lead to Early Help being offered
 - Making a referral to the police or social care services.

5.4. FLOW CHART FOR RAISING SAFEGUARDING CONCERNS



5.5. REPORTING SAFEGUARDING ISSUES

- 5.5.1. Report your concerns to your designated safeguarding lead as soon as possible with this as the default action.
- 5.5.2. Concerns about a staff member may not always be apparent as safeguarding concerns. Something might at first appear to be related to equality, a practice issue or generally about the conduct of a staff member.
- 5.5.3. Any concerns about a member of staff should be raised directly with the Head Teacher, if the concern is about the Head Teacher then it should be raised with the Regional Trust Lead.

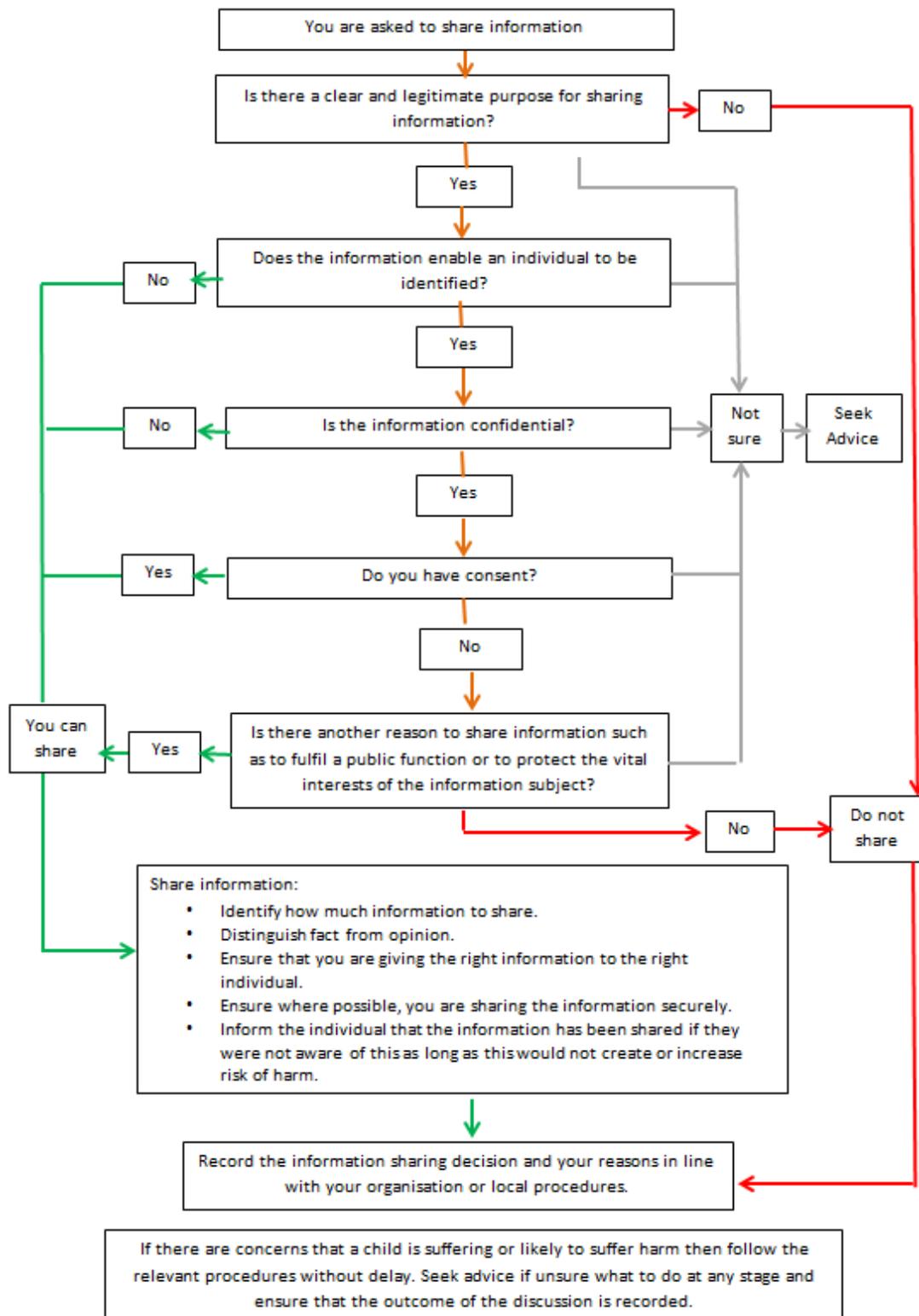
Parental consent

- 5.5.4. You should seek to discuss concerns with parents/carers and, where possible seek agreement to make a referral unless this may, either by delay or the behavioural response it prompts place the child at increased risk of Significant Harm.
- 5.5.5. A decision not to seek parental permission before making a referral to Children's Social Care must be recorded and the reasons given. Likewise, where a parent has agreed to a referral this must be recorded and confirmed on the relevant Referral Form.
- 5.5.6. Having taken full account of the parent's wishes if it is still considered that there is a need for a referral:
- The reason for proceeding without parental agreement must be recorded
 - The Children's Social Care team should be told that the parent has withheld her/his permission

5.6. INFORMATION AND DATA SHARING

- 5.6.1. All matters relating to child protection will be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2018) guidance and the Terms of Reference of the Campus Safeguarding Committee.
- 5.6.2. The DSL must understand and convey to staff the relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- 5.6.3. All staff must understand the importance of information sharing, both within the Campus, and with safeguarding partners, other agencies, organisations and practitioners.
- 5.6.4. Information will be shared with staff within the Campus on a 'need-to-know' basis.
- 5.6.5. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- 5.6.6. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Head Teacher or DSL will only disclose information about a child to other members of staff on a need to know basis.
- 5.6.7. All staff will always undertake to share the intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.

5.7. FLOW CHART TO GUIDE INFORMATION SHARING



5.8. MAKING A REFERRAL

- 5.8.1. When deciding whether to make a referral following an allegation or suspicion or abuse the DSL should ensure they understand all the background and context to the allegation. What happened, when, who was present, what was said as well as the DSL's professional opinion and the action taken are incredibly important. If there is any doubt as to the threshold for referral then this Campus will discuss the matter initially on a no names basis with the Local Authority.
- 5.8.2. What appears minor at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus, the Campus should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse. **That said it is important to ask open questions in order to gain a reasonable understanding of all the circumstances. It is also very important to record exactly what was asked and what was said in response. This will be recorded on CPOMS.**
- 5.8.3. Keeping Children Safe in Education 2018 sets out that within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required.
- 5.8.4. This will include determining whether:
- The child requires immediate protection and urgent action is required
 - The child is in need, and should be assessed under section 17 of the Children Act 1989
 - There is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989
 - Any services are required by the child and family and what type of services, for example Early Help Services
 - Further specialist assessments are required to help the local authority to decide what further action to take
 - To see the child as soon as possible if the decision is taken that the referral requires further assessment.
- 5.8.5. The referrer should follow up if this information is not forthcoming. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment supported by the designated safeguarding lead (or deputy as required).
- 5.8.6. It is also very important that as professionals we recognise that if we are not content with the response from the Local Authority then we will potentially challenge the outcome utilising the local escalation process. Staff should follow up any referral with the Local Authority in which we do not have an established outcome.
- 5.8.7. Concerns about children should be made to Children's Social Care for the area in which the child lives.
- 5.8.8. Any concerns about staff members should be referred to the Local Authority Designated Officer (LADO) from the area the Campus is based.
- 5.8.9. Contact with Children's Social Care be done tentatively and without giving names in the first instance. However, Children's Social Care may request more details if they deem it necessary, in which case any details requested will be given.
- 5.8.10. Outcomes should be communicated to the initial referrer in broad terms if they are a member of staff so that they can be sure they have addressed their statutory responsibility. For others raising concerns that do not have that professional

responsibility then confirmation that the matter has been addressed would ordinarily be sufficient. We must be clear the matter has been taken seriously and addressed appropriately.

5.9. ALLEGATIONS OF ABUSE MADE AGAINST STAFF

- 5.9.1. Anyone may make an allegation against a member of staff, volunteer or Head Teacher. The Head Teacher is ordinarily responsible for receiving, managing and collating concerns about adults at the school. All such allegations should be brought to their attention. If the concern is about the Head Teacher then the Regional Trust Lead (without informing the Head Teacher) should be informed.
- 5.9.2. The Local Authority Designated Officer (LADO) should be informed immediately of any disclosure about a staff member or adult working with the school in any capacity if it is apparent 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 may pose a risk of harm to children.
- 5.9.3. In making a decision to discuss with the LADO, it is very important that all the background and context is collated and understood. Issues such as previous similar allegations, corroborative information etc. are all relevant to the decision making. For the avoidance of doubt, no attempt will be made to investigate an allegation against a member of staff without the explicit authorisation of the LADO.
- 5.9.4. A record will be made of any decision not to refer with clear rationale as to why not. If there is any doubt, then the expectation is that a discussion with the LADO will occur. If a criminal offence has been committed, the police and the LADO will be contacted.
- 5.9.5. This Campus also recognises that our staff can on occasion go through difficult periods in their own lives. This may result in suggestions of domestic abuse, excessive use of alcohol, allegations of assault etc. away from Campus life. If and when this becomes known to the school the same approach to considering any risk that the individual may pose to our children will be considered and if appropriate referred to the LADO.
- 5.9.6. The specific procedures for responding and managing such allegations are set out in Section 4 of KCSIE 2018 and these will be followed. This includes suspension and the action following false or malicious allegations.
- 5.9.7. If there is a suggestion that a child has suffered or likely to have suffered significant harm, then the Campus will support and contribute to any strategy discussion led on by Children's Social Care.
- 5.9.8. If the allegation is substantiated and the member of staff is dismissed or the Campus ceases to use their services, or they resign or otherwise cease to provide their services, the LADO should discuss with the case manager and their personnel adviser whether the Campus should make a referral to the DBS for consideration of whether inclusion on the barred lists is required; and whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

5.10. LOW LEVEL CONCERNS ABOUT ADULTS IN SCHOOL

- 5.10.1. Low level concerns, that may not reach the LADO's threshold for reporting, should be referred to the Head Teacher. Such 'low-level' reporting will enable patterns of inappropriate behaviour to be detected as early as possible and for appropriate and proportionate action to be taken swiftly in response. This may include investigating the matter and clearly explaining to the adult who is the subject of the concern:
- why their behaviour is inappropriate

- exactly what they should do going forwards to ensure that they correct their behaviour
- the consequences if they don't (e.g. disciplinary action/referrals to LADO)
- closely monitoring the situation to ensure that the member of staff is in fact correcting their behaviour.

5.10.2. A record of the action taken should be placed on the staff's confidential and secure personnel file so that any concerning patterns of behaviour can be spotted if there is a reoccurrence in the future. Those that do not reach the threshold for LADO referral in isolation will not be documented in any future reference request.

5.11. DEALING WITH THE MEDIA

5.11.1. When an allegation is made, the Campus will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 at s141F introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a student from the same Campus (where that identification would identify the teacher as the subject of the allegation).

5.11.2. The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restriction in response to a request to do so. The legislation imposing restrictions makes clear that publication of material leading to the identification of the teacher who is the subject of the allegations is prohibited.

5.11.3. In most cases the LADO at the local authority, Police and Children's Social Care Services will have agreed:

- who needs to know and exactly what information can be shared
- how to manage speculation, leaks and gossip
- what, if any, information can be reasonably given to the wider community to reduce speculation
- how to manage press interest if and when it should arise.

5.11.4. Allegations that are found to have been malicious should be removed from personnel records and any that are not substantiated as malicious should not be referred to in employer references.

5.11.5. OSGUK has a national Communications Strategy. This details how the organisation will respond to serious reputational allegations and the principles of that response and can be found in Appendix 4.

5.12. WHISTLEBLOWING

5.12.1. In line with KCSIE Guidance all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding practices and know that such concerns will be taken seriously by the Senior Leadership Team.

5.12.2. Where a member of staff feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, they should reference the schools Whistleblowing Policy; this document includes general guidance and advice on Whistleblowing and details of the NSPCC Whistleblowing helpline.

5.12.3. The NSPCC Whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285. The line is available from 8am to 8pm, Monday to Friday or e-mail: help@nspcc.org.uk

5.13. SOCIAL MEDIA

5.13.1. Staff are expected to comply with the Trust's ICT and E-Safety Policy, which includes having no contact with students or parents via social media websites, text or personal mobile phones. Any compromise should be brought to the attention of the SLT by the staff member concerned.

5.14. COMPLAINTS

5.14.1. Complaints from parents or pupils about the school's response to child safeguarding will be addressed using the Complaints Policy.

5.15. EARLY HELP, CHILD IN NEED, CHILD AT RISK OF SIGNIFICANT HARM

5.15.1. For some children, school may be the one stable place from which they can expect security and reassurance. It is not only about being alert to potential abuse but providing the support to help children through difficult times, providing those with the coping skills that can help avoid situations arising and dealing with the emotional difficulties afterwards if they do.

5.15.2. EARLY HELP

- If early help is appropriate, the DSL (or DDSL) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.
- The Campus will be prepared to identify children who may benefit from early help. This means providing support as soon as a problem emerges at any point in a child's life. All staff should understand their role in early help and support the assessment process. Staff are encouraged to discuss any early help requirements with the DSL.
- The DSL will liaise with parents early on to ensure that early help will be effective. If the child or parents refuse consent to an Early Help Assessment, then further advice will be taken from the Local Authority. There may be a requirement to support other agencies and professionals in an early help assessment.

5.15.3. CHILD IN NEED

- A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

5.15.4. CHILD SUFFERING OR LIKELY TO SUFFER SIGNIFICANT HARM

- Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

5.16. EXTREMISM AND RADICALISATION (THE PREVENT DUTY)

- 5.16.1. The Campus has a statutory duty under The Counter-Terrorism and Security Act 2015 and the statutory Prevent Guidance 2015 to have due regard to the need to prevent people from being drawn into terrorism.
- 5.16.2. Extremism is defined as vocal or active opposition to fundamental values of our society, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
- 5.16.3. Radicalisation is defined as the act or process of encouraging extremist views or actions in others, including forms of extremism leading to terrorism. Where a student is identified as being at risk of radicalisation, the DSL will consider the level of risk in order to identify the most appropriate referral.
- 5.16.4. The Campus will use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

5.17. CHILDREN ABSCONDING OR GOING MISSING FROM AN EDUCATIONAL SETTING

- 5.17.1. Should a child abscond or go missing it is a potential for abuse and neglect and the Campus has a procedure in place detailed in the Attendance Policy to ensure the safeguarding of a child going missing, particularly on repeat occasions. The Head Teacher will log incidents, contact parents and / or other agencies as appropriate and in line with the Attendance Policy. This may be delegated to the DSL. It is important to establish the background and context as to why a child has gone missing.
- 5.17.2. The Campus will inform the LA if a child is missing for 10 consecutive days or more without permission.
- 5.17.3. Additional information is available in Annex A of KCSIE 2018 and the DfE Guidance Children Missing Education 2016 which details the process for reporting.
- 5.17.4. Removal of a Student from Roll:
 - The Campus will notify the Local Authority where the Campus is based when they are about to remove a student's name from the Campus admission register. Full details of the student will be provided to the LA when removing a student from roll and all reasonable enquiries will be made to establish the whereabouts of the child jointly with the LA.
- 5.17.5. Adding a student to Roll:
 - The LA for the child's locality will be informed within 5 days when adding a student to the admission roll at a non-standard transition point. Full details of the student will be provided to the LA.

- 5.17.6. A non-standard transfer includes transfer into our school at Year 3, as this is not a usual transition point in mainstream education.
- 5.17.7. This Guidance will also form part of the Admissions Policy.

5.18. PEER ON PEER (PoP) ABUSE

- 5.18.1. PoP abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in PoP abuse is under the age of 18.
- 5.18.2. PoP abuse in any form will not be tolerated and will be taken seriously. It will not be simply seen as banter, 'having a laugh', or 'part of growing up'. The Campus will put the safety, health and well-being of the child at the forefront of any action taken.
- 5.18.3. The Campus has put in place safeguards to reduce the likelihood of PoP abuse. There is an established ethos of moral integrity, respect, friendship, courtesy and kindness with a clear Behaviour Policy and visible staff presence. We seek to educate all students on healthy relationships through the curriculum by exploring concepts such as consent, gender roles, stereotyping and equality. We recognise that, despite this, we need to be alert to PoP abuse which is most likely to manifest itself as:
- Bullying (including cyberbullying)
 - Physical abuse
 - Sexual violence and harassment
 - Sexting (youth produced sexual imagery)
 - Initiation violence and rituals
- 5.18.4. Any PoP allegation must be referred to the DSL using CPOMS to record what has happened and any action taken. Where a concern regarding peer on peer abuse has been disclosed to the DSL advice and guidance may be sought from Children's Social Care. Where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted. If a student's behaviour negatively impacts on the safety and well-being of others then safeguards will be put in place to promote the welfare of the students affected.
- 5.18.5. In relation to understanding exactly what has happened and why the school recognises the influences of peers and family beyond the 'school gate'. The contextual aspect is very important in determining the best action to take going forward.
- 5.18.6. As a Campus, we recognise the research that suggests PoP abuse can be gender based, as PoP abuse manifests differently for boys and girls. Boys are at greater risk of gang violence whereas girls are at greater risk of sexual assault and sexual exploitation
- 5.18.7. Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include: Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and communication barriers and difficulties overcoming these barriers.
- 5.18.8. Any reports of abuse involving children with SEND will require close liaison with the Designated Safeguarding Lead (or deputy) and the named person with oversight for Learning Support at the Campus.

5.18.9. In all circumstances, the victim and perpetrator will be provided with support to prevent any reoccurrence of improper behaviour and sanctions will be applied in line with the Behaviour Policy. We will seek to open up choices and involve our students in solutions.

5.19. LEARNING SUPPORT – SEN AND DISABILITIES

5.19.1. In supporting children at risk, it is recognised that an additional barrier can exist when recognising abuse and neglect of children with Special Educational Needs and Disabilities. As a consequence, this Campus recognises the potential that extra pastoral support should be considered. This can include:

5.19.2. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability as opposed to being indicators of abuse.

5.19.3. Children with SEN and disability can be disproportionately impacted by things like bullying without outwardly showing any signs

5.19.4. Communication barriers and difficulties in overcoming these barriers

5.19.5. Children with SEND are at a higher risk of peer group isolation and as a consequence this Campus recognises the potential that extra pastoral support should be considered.

5.20. HELPING CHILDREN TO KEEP THEMSELVES SAFE INCLUDING ONLINE

5.20.1. Children at the Campus are taught to recognise, self-reflect and manage risk through the Campus Personal, Social, Health and Economic (PSHE) curriculum, lessons and rehearsed throughout all aspects of Campus life.

5.20.2. This will include covering relevant issues through Relationships Education and Relationships and Sex Education, online safety week, the Campus tutor-time programme.

5.20.3. The Campus approach is designed to help children to think about risks they may encounter and, with staff, work out how to self-manage to reduce those risks. This should include:

- discussion about risk, promoting sensible behaviour
- teaching children how to conduct themselves and how to behave in a responsible manner
- reminding children about e-safety, mobile devices and tackling bullying procedures

5.20.4. The main areas of online risk are:

- Content - exposure to inappropriate or harmful content
- Contact - being subjected to harmful online interaction with other users
- Conduct - personal online behaviour that increases the likelihood of, or causes, harm

5.20.5. We will never achieve risk-aware young people who can keep themselves safe, by over-blocking content.

5.20.6. There will be training for parents in e-safety at least annually, delivered by the Campus, led by the DSL. Parent engagement will be tracked, to guide intervention and catch-up for any parents/carers unable to engage.

5.20.7. The Campus promotes an ethos of respect for students and they must be aware of who to speak to in confidence about any worries they may have, including electronic reporting with the e-safety button.

5.21. ICT & E-SAFETY POLICY

5.21.1. This Campus has a separate ICT & E-Safety policy. It details the roles and responsibilities of the whole school community as well as the method for filtering and monitoring. Breaches are reported in accordance with the ICT & E-Safety policy.

5.22. E-SAFETY REPORTING BUTTON

5.22.1. To ensure that students and school family have access to a confidential and direct reporting system, we have an e-safety reporting button on the main page of our Intranet. The button is for reporting concerns about e-safety, bullying, inappropriate use of computers or the internet. It is labelled as such.

5.23. CHILD CRIMINAL EXPLOITATION: COUNTY LINES

5.23.1. 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.

5.24. CHILD SEXUAL EXPLOITATION (CSE)

5.24.1. 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.

5.24.2. The victim may have been sexually exploited even if the sexual activity appears consensual.

5.24.3. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology.

5.24.4. Keeping Children Safe 2018 contains additional indicators of CSE. All staff and volunteers will be trained in the signs of CSE.

5.24.5. Reporting of concerns to the DSL, however low-level the concern may seem, is always essential to highlight early concerns and ensure they are followed up by the DSL. Equally, if there are concerns about the conduct of staff or volunteers, these should be reported to the Head Teacher immediately.

5.24.6. However low level a concern appears, it is critical for it to be followed up straight away.

5.25. CHILDREN WITH SEXUALLY HARMFUL BEHAVIOUR

5.25.1. The management of children and young people with sexually harmful behaviour is complex and the Campus will work with other agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a student's sexual behaviour should speak to the DSL as soon as possible.

5.26. DOMESTIC ABUSE

5.26.1. The cross-government definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or

abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

- 5.26.2. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.
- 5.26.3. Advice on identifying children who are affected by domestic abuse and how they can be helped is available at: NSPCC UK (www.nspcc.org.uk)
- 5.26.4. All staff and volunteers should be alert and should report any concerns, however low-level they may seem, to the Designated Safeguarding Lead, so that concerns can be reviewed, and patterns of information built up.

5.27. FEMALE GENITAL MUTILATION (FGM)

- 5.27.1. (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence and there are no medical reasons to carry out FGM
- 5.27.2. The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify Police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.
- 5.27.3. Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out and discuss such cases with the safeguarding lead and Children's Social Care. The duty does not apply in relation to at risk or suspected cases. At risk or suspected cases should follow standard safeguarding arrangements.

5.28. FORCED MARRIAGE

- 5.28.1. A forced marriage is one in which one or both parties do not consent to the marriage but are coerced into it (may include the use of violence and threats). This is not the same as an arranged marriage which is common in many cultures.

5.29. HOMELESSNESS

- 5.29.1. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- 5.29.2. The designated safeguarding lead (and deputy) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.
- 5.29.3. Indicators that a family may be at risk of homelessness include household debt and domestic abuse as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not replace a referral into children's social care where a child has been harmed or is at risk of harm.
- 5.29.4. It should also be recognised in some cases 16 and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the

designated safeguarding lead (or deputy) should ensure appropriate referrals are made based on the child's circumstances.

5.29.5. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17-year olds who may be homeless and/ or require accommodation.

5.30. HONOUR-BASED VIOLENCE (HBV)

5.30.1. HBV is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is a collection of practices which are used to control behaviour in families and other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators believe that a relative has shamed the family or community.

5.30.2. HBV might be committed against individuals who:

- Become involved with a boyfriend/girlfriend from a different religion or culture
- want to get out of an arranged or forced marriage
- wear clothes or take part in activities that are not considered 'traditional' within a particular culture

5.31. YOUTH PRODUCED SEXUAL IMAGERY (SEXTING)

5.31.1. UK Council for Child Internet Safety (UKCCIS) has published non-statutory guidance on managing incidents of sexting by under-18s. The UKCCIS guidance is non-statutory but should be read alongside KCSIE 2018. It should be followed unless there's a good reason not to do so.

5.31.2. There is no clear definition of 'sexting'. Instead, our policy refers to 'youth-produced sexual imagery'. This is imagery that is being created by under 18s themselves and involves still photographs, video, and streaming. In the guidance, this content is described as sexual and not indecent. Indecent is subjective and has no specific definition in UK law.

5.31.3. Incidents covered as Youth Produced Sexual Imagery:

- **Person under 18 creates** a sexual image of themselves and shares it with another person under 18
- **A person under 18 shares** an image of another under 18 with another person under 18 or an adult
- **A person under 18 is in possession** of sexual imagery created by another person under 18.

5.31.4. Incidents not covered by the guidance:

- Under 18s sharing adult pornography
- Under 18s sharing sexual texts without sexual imagery
- Adults sharing sexual imagery of under 18s. **(This is child sexual abuse and must always be reported to police.)**

5.31.5. Our response should be guided by the 'principle of proportionality' (see definitions).

5.31.6. Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18.

5.31.7. Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- a naked young person

- a topless girl
- an image which displays genitals
- sex acts including masturbation
- indecent images may also include overtly sexual images of young people in their underwear

5.31.8. These laws weren't created to criminalise young people but to protect them.

5.31.9. When responding to suspected youth produced sexual imagery the actual images must not be viewed. In determining the response, the DSL will consider if the circumstances are 'experimental' or 'aggravated' (Wolak and Finkelhor, 2011).

5.31.10. If the school has decided that involving other agencies is not necessary, consideration should be given to deleting the images. It is recommended that students are asked to delete the images themselves and confirm they have done so. This should be recorded, signed, and dated. Any refusal to delete the images should be treated seriously, reminding the student that possession is unlawful.

5.32. PERSONAL EDUCATION PLAN AND LOOKED AFTER CHILDREN

5.32.1. Children who are 'looked after' will have their own personal education plan (PEP). The PEP is part of the care plan. It is a record of what needs to happen in order to enable the child to 'fulfil their potential'. It should reflect other education plans such as individual education plans, behaviour plans etc. Staff in this Campus recognise that previously looked after children still remain vulnerable. The DSL should make contact as necessary with the Local Authority personal advisor when individuals leave care.

5.33. SUPPORT IN CAMPUS

5.33.1. All class teachers and year group leaders are responsible, in conjunction with other Campus staff, for the pastoral needs of the children in their care. This includes maintaining opportunity for children to share their concerns and follow the guidance in this document. Care should always be taken in regard to the discussion of sensitive issues and advice should be sought from a DSL where there are concerns.

5.33.2. Within the curriculum there will also be opportunities to discuss issues which some children might find sensitive. Care should be taken particularly in relation to discussion about families and their make-up. Assumptions about members of families and the presence of both parents should be avoided both in discussion and the presentation of materials. Staff should make themselves familiar with the background of the children in their care in order to avoid distress.

5.34. PHYSICAL CONTACT WITH STUDENTS

5.34.1. Physical contact with students must be avoided. The Staff Code of Conduct sets out expectations around professional behaviour.

5.35. RECORD KEEPING

5.35.1. Child Protection records should be retained by the last school attended. The long-term security of relevant safeguarding documents and related correspondence is crucial should allegations of abuse arise. All such documents must be securely retained from the date of birth of the student plus 50 years. For further information please refer to the Retention of Records policy.

5.35.2. Storage provisions for all such documents must be arranged in the event of the School / Education Trust ceasing operations. Storage in these circumstances would

be at the office of a solicitor, accountant or at a professional secure storage company.

5.35.3. The following information should be retained for a minimum of 50 years:

- A copy of Safeguarding Policies and revisions thereof
- Records of safeguarding training
- Records of abuse allegations or incidents including notification to the appropriate authorities
- Copies of relevant information and accompanying correspondence relating to abuse of students whilst in your care
- Copies of your historical public liability insurance policies

5.36. TRANSFERRING FILES

5.36.1. The DSL is responsible for ensuring that the Child Protection Files are transferred to each school that a child moves to (e.g. primary to secondary) and the transfer must be conducted securely. It is good practice to request a receipt from the accepting school. The DSL will carefully consider what is transferred but it is important to give the receiving school a good understanding of any issues, a clear narrative and action taken. It may well be appropriate for the current DSL to make contact with the receiving school to assist with understanding. If a child has siblings that are staying in the same Campus it is important to keep a copy of that child's file to retain context/background.

5.36.2. The Designated Safeguarding Lead will:

- ensure transfer of Child Protection Files to the new school without delay; within 5 days. Ask for confirmation of receipt from the receiving school
- send separately from the student's general school file

5.37. PARENT ACCESS TO EDUCATIONAL RECORDS

5.37.1. Other than in exceptional circumstances, Campuses must make available for inspection or provide a copy of a student's educational record if requested to do so in writing by a parent or student. This must be supplied within 30 days of a request.

5.37.2. Educational record means any information processed relating to the student or former student of the Campus which originated from or was supplied by any member of staff, the student themselves or a parent of that student. The Educational Record must not disclose any information which you would be prohibited from sharing with the student themselves under the GDPR 2018 or which that the student would have no right to access themselves such as consider third party information.

5.37.3. In some circumstances access can be refused, for example, providing information about social services or related activities, if disclosure may cause serious harm to the physical or mental health of the student, releasing information that would be likely to prejudice an ongoing criminal investigation or confidential communications between client and professional legal adviser.

5.38. PARTNERSHIP WITH PARENTS

5.38.1. It is important that the Campus has an established approach to working with parents – for parents' training and for liaison in the event of a child protection concern. Key to this is the cultural tone set by the Head Teacher and Trustees in terms of what good safeguarding practice looks like and what can be expected.

Parents' and children's need for privacy should be respected and such a position is supported by the Data Protection Act (GDPR) 2018. However, the priority is the needs of the child and effective liaison is crucial unless such action would put a child or vulnerable adult at risk of harm.

- 5.38.2. It should be recognised that families from different backgrounds and cultures will have different approaches to child-development. These differences should be acknowledged and respected provided they do not place the child at risk.

5.39. PRIVATE FOSTERING

- 5.39.1. Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parent(s) or close relative. Close relatives are defined by Section 105 Children Act 1989 as a grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership) or step-parent
- 5.39.2. To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous. That continuity will not be disrupted by occasional short breaks
- 5.39.3. 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.
- 5.39.4. 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.
- 5.39.5. 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.
- 5.39.6. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered, to record this on SIMS and to update records with all changes.

5.40. SAFEGUARDING STUDENTS ON WORK EXPERIENCE

- 5.40.1. The safeguarding of a student on placements for vocational training or work experience should be considered and appropriately risk assessed. Where students on work placements are supervised by someone who is themselves unsupervised, the Campus must obtain an enhanced DBS check for that supervisor before the placement begins. Where the student is under 16 years of age, the Campus must also obtain a barred list check for that supervisor. Campuses cannot obtain a barred list check where the student is aged 16 or 17.

5.41. ONE-TO-ONE TEACHING, EXTENDED SCHOOL AND OFF-SITE-ARRANGEMENTS

- 5.41.1. Where staff are engaged in 1:1 teaching or coaching with students, for example, being coached for a presentation in assembly or sports day event, or receiving additional support with their studies, staff should ensure that a senior leader is aware of the 1:1 work and at all times, 1:1 discussions with students should most

appropriately take place in rooms which are openly visible to other members of staff.

5.41.2. If other organisations provide services or activities on the site, the Campus must check that they have appropriate procedures in place, including compliance with safer recruitment procedures. The school should check the appropriateness of any visitor to the school (e.g. by open source internet searches).

5.41.3. When students attend off-site activities, including day visits and work-related activities, the Campus will check that effective child protection arrangements are in place. In the case of such alternative provision the Campus should obtain written confirmation that the appropriate safeguarding checks have been conducted.

5.42. VIDEO CONFERENCING AND OFF-SITE ARRANGEMENTS

5.42.1. Where students are in Video Conference or other conference links with staff from other Focus Campuses there will be written assurance from the teacher's employing Campus that all vetting checks, including DBS, have been carried out and these staff will be added to this school's SCR.

5.43. IMAGES AND PHOTOGRAPHY

5.43.1. The Campus ICT and E-Safety Policy and procedures will be followed. In summary the Campus will:

- use only the student's first name with an image
- ensure that students are appropriately dressed
- encourage students to tell if they are worried about any photographs that are being taken of them.

5.43.2. It would be normal practice to demonstrate Campus life by way of photographs and video. If teachers, staff, Trustees or visitors have any concerns about themselves being in photographs associated with the school they should bring that to the attention of the Head Teacher.

5.43.3. Volunteers acting as such within the school day must also ensure they understand and adhere to the Campus approach to the taking of photographs. It would not be acceptable for a member of teaching staff to be taking photographs of children on their personal phone and the same standards are expected of volunteers.

5.43.4. It is not acceptable for staff, volunteers or Trustees to post photographs of children, taken within the context of the school, on social media. Photographs of your own children shared on a one to one basis via a medium such as 'What's App' or 'Blackberry Messaging' would be acceptable.

5.43.5. A common-sense approach to the taking, sharing and posting of photographs of children whilst at school by their family and friends is requested. An appreciation of the risks is important. It is not acceptable for family and friends to take photographs for anything other than personal use. Any abuse of this approach will mean the circumstances being reviewed and may result in more restrictive measures in school.

5.44. VISITORS TO THE CAMPUS

5.44.1. The Campus will ensure that it complies with the Prevent Duty which requires schools to verify the suitability of all visiting speakers (e.g. internet searches). Schools do not have the power to request DBS checks and barred list checks for visitors, and KCSIE requires Head Teachers and principals to use their professional judgment about the need to escort or supervise visitors.

5.45. SITE SECURITY

- 5.45.1. The Campus Security & Visitor Policy and procedures will be followed. Visitors to the Campus are asked to sign in and are given a badge, which confirms they have permission to be on site. Red lanyards denote a lack of security clearance and those individuals must be accompanied at all times i.e. contractors. Green lanyards denote those who are security cleared such as staff.
- 5.45.2. All security cleared OneSchool staff will wear identification badges with green lanyards issued from Head Office if on school grounds.
- 5.45.3. All visitors are expected to observe the Campus's safeguarding and health and safety requirements to ensure children in Campus are kept safe.
- 5.45.4. The Head Teacher will exercise professional judgement in determining whether any visitor should be escorted or supervised whilst on site.
- 5.45.5. The Campus will comply with the CCTV Policy in line with the GDPR 2018 and supporting policy.

6. GUIDELINES

- **Legislation**

Children and Families Act 2014

Childcare Act 2006

Counter-Terrorism and Security Act 2015

Protection of Freedoms Act 2012

Education Act 2011

Children and Young Persons Act 2008

Education and Inspections Act 2006

Safeguarding Vulnerable Groups Act 2006

Education (Independent Schools Standards) (England) Regulations 2014

Education (Provision of Information by Independent Schools) (England) Regulations 2010

GDPR 2018

Children Act 1989

- **Guidance both statutory and non-statutory**

Advice on drugs in schools – 2012

Child Sexual Exploitation; definition and guide for practitioners - Feb 2017

Contextual safeguarding – University of Bedfordshire – 2018

DfE Guidance Keeping Children Safe in Education - September 2018

DfE Children Missing in Education - September 2016

Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers - July 2018

Preventing and tackling bullying – July 2017

Prevent Duty Guidance: for England and Wales 2015

Safeguarding children in whom illness is fabricated or induced – 2008

Sexual harassment between children May 2018

School security advice – 2012

UKCCIS (2016) 'Sexting in Schools and Colleges' - Responding to incidents and safeguarding young people'

Use of force within schools – July 2013

What to do if you're worried a child is being abused – Advice for practitioners - March 2015

Working Together to Safeguard Children - July 2018

- **Additional guidance and information**

Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018).

NSPCC Website Link: <http://www.nspcc.org.uk/>

NSPCC website link to Preventing Abuse: <http://www.nspcc.org.uk/preventing-abuse/>

CEOP's Thinkuknow programme – Keeping children safe on-line and protecting them from sexual abuse and exploitation. <https://www.thinkuknow.co.uk/Teachers/>

Safenetwork website jointly managed by the NSPCC and Children England <http://www.safenetwork.org.uk/Pages/default.aspx>

7. ASSOCIATED DOCUMENTS

- Anti-Bullying Policy
- Attendance Policy
- Behaviour Management Policy
- IT and E-Safety Policy
- Complaints Policy
- Curriculum Policy documents and schemes of work for PSHE
- Data Protection Policy
- Disciplinary Procedure
- Health & Safety Policy including the following procedures:
 - Educational Visits
 - First Aid including arrangements for meeting the medical needs of children
 - School Security
- Induction of new staff and volunteers
- Learning Support (SEND) Policy
- Physical Control Policy
- (The) Prevent Duty Guidance
- Recruitment Policy
- Security & Visitors Policy
- Staff Code of Conduct

8. ATTACHMENTS

Appendix 1 Further Information on Signs of Abuse

Appendix 2 OSGUK Training Strategy

Appendix 3 Working Together to Safeguard Children 2018

Appendix 4 OSGUK Communications Strategy

Appendix 5 A – Display Notice - Safeguarding Display Posters

B – Display Notice – Safeguarding Local Arrangements

C – Display Notice – Safeguarding Contacts Posts

Appendix 6 DSL Job Description

Policy Details

Effective Date:	April 2019	Review Date:	September 2020
Approval Authority:	Board of Trustees	Expiry Date:	TBC
Policy Author:	Matt Phillips	Enquiries Contact:	support@focus-school.com
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